

Five Year Housing Land Supply Draft Position Statement 2020

**Partial Review Version
October 2020**

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1. Introduction

- 1.1 This document provides a Draft Position Statement in relation to Fylde Council's current housing land supply position, as it relates to the requirement for a five-year housing land supply. This version of the statement provides the supply position at the base date 1st April 2020.
- 1.2 Local Planning Authorities (LPAs) should identify sufficient deliverable sites to provide five years' worth of housing against their housing requirement. Section 2 below on National Policy and Guidance sets out the requirements in relation to housing land supply and the Annual Position Statement. Section 3 describes the background to the production of this statement, in relation to the adopted Fylde Local Plan to 2032. Section 4 provides an explanation of the methodology used by the Council to determine the requirement, the sites included, their expected delivery rates and lead-in times. Section 5 provides the draft calculation, which is derived from the site-related data in Appendices 1 and 2, and the outcomes of the engagement process documented in Appendix 3.
- 1.3 This version of the Draft Position Statement has been produced in support of the submission of the Partial Review of the Fylde Local Plan. It reproduces the iteration of the Draft APS submitted to the Planning Inspectorate, including the original trajectories and Engagement Statement. However, the calculation in Section 5 has been amended for this version to illustrate the effects of the revisions proposed in the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32, specifically the amendment to the housing requirement to a range of 275-415 for the remaining years of the plan period. The recalculation made here has resulted in a slightly different residual requirement from that shown in the Partial Review. Text has been modified where necessary in Sections 1 to 6 of the document by way of explanation of the changes made.

2. Policy and Guidance

Fylde Local Plan to 2032

2.1 The Fylde Local Plan to 2032¹ is the principal statutory development plan document for the Borough (other development plan documents being the Joint Lancashire Minerals and Waste Core Strategy DPD 2009, the Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policies DPD, the St Anne's on the Sea Neighbourhood Plan and the Bryning-with-Warton Neighbourhood Plan (in the relevant areas). The Fylde Local Plan was adopted in October 2018.

2.2 Policy H1 of the Local Plan states:

The Council will provide for and manage the delivery of new housing by:

a) Setting and applying a minimum housing requirement of 415 net homes per annum for the plan period 2011-2032

b) Keeping under review housing delivery performance on the basis of rolling 3 year completion levels as set out in accordance with the Monitoring Framework at Appendix 8.

c) Ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply calculated using the "Liverpool" method from the start of each annual monitoring period and in locations that are in line with the Policy DLF1 (Development Locations for Fylde) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Local Plan.

d) The delivery of the developable sites, which are allocated for housing and mixed use from 1 April 2011 to 31 March 2032 and provided for through allowances, to provide for a minimum of 8,715 homes.

2.3 In the supporting text, paragraph 9.17 considers the delivery in the early part of the plan period and calculates a residual requirement for the remainder of the plan period from 2017 to 2032 of 479 net dwellings per annum, formalising the use of the "Liverpool" method within the calculation. Paragraph 9.19 refers to the trajectory graph provided as an appendix to the plan and commits the Council to producing a detailed trajectory at least annually. The relevant paragraphs of the Local Plan are set out below:

The Five Year Housing Supply

9.15 *Councils are required to have a five year supply of housing land available. Where an authority is unable to demonstrate a five year supply, applications for housing development will be decided with regard to the 'presumption in favour of sustainable development' contained within paragraph 14 of the Framework. Unless there is an overriding reason why an application should be refused, the Council may find it difficult to resist development which it may consider unsuitable for other reasons. The housing supply will be reviewed at least annually as part of the Council's Authority Monitoring Report and Housing Land Supply Statement.*

¹ <https://new.fylde.gov.uk/adopted-local-plan-to-2032/>

Housing Delivery

- 9.16** *The historic rate of delivery of new homes in Fylde, before the recession, averaged around 250 homes each year. The annual housing requirement for Fylde is 415 net dwellings per annum. A calculation of 415 net dwellings per annum for 21 complete calendar years from 1 April 2011 to 31 March 2032 produces an overall housing requirement figure of a minimum of **8,715** for the Plan period. The Council has identified sufficient sites, including an allowance for small sites and windfalls, to provide a supply figure of **8,819** homes over the Plan period.*
- 9.17** *1,538 dwellings have been completed in Fylde from 2011-2017, an average of 256 dwellings per annum. When this figure is subtracted from the overall plan period requirement of 8,715, it gives a residual requirement of 7,177 dwellings to be completed from 2017 to 2032. This figure (7,177) includes the shortfall which has accrued during the early years of the plan when large sites were in the planning process. This equates to 479 dwellings per annum for the remaining years of the plan period. This is the 'Liverpool' method, for the purpose of calculating the 5 year housing land supply and is necessary in order to provide the most effective strategy to facilitate the delivery of housing during the plan period.*
- 9.18** *The housing requirement figure relates to all types of housing including apartments, family housing and housing for specific needs such as the elderly and includes both market and affordable housing. The allocation of new homes over the Plan period to 2032 is set out in policy **H1** below.*
- 9.19** *The trajectory at **Appendix 2** shows the anticipated delivery of homes in relation to the requirement, throughout the plan period to 2032. A detailed trajectory will be published at least annually as part of the Council's Housing Land Supply Statement. The Council's monitoring of housing completions has revealed that since the start of the Local Plan period a shortfall of 952 homes has accrued as at 31st March 2017. Planning application commitments amount to 6,111 homes as at 30th September 2017. This means that 70% of the requirement for the plan period already has planning permission. Completions are anticipated to increase as larger sites commence delivery. The shortfall of 952 homes will be delivered over the remainder of the plan period to 2032.*
- 2.4 Policy DLF1 Development Locations for Fylde provides a development strategy for the provision of a minimum of 8,715 homes over the plan period.
- 2.5 Appendix 8 to the Local Plan sets out the performance monitoring framework, with indicators relating to housing delivery against the residual requirement, housing land supply calculated using the Liverpool approach, and net homes delivered against the housing trajectory, as well as others relating to other aspects of planning. Monitoring of the Local Plan has been undertaken since adoption and an Authority Monitoring Report² has been published.

² <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/authority-monitoring-reports-amr/>

Partial Review of the FLP32

- 2.6 The Council has conducted a Partial Review of the Fylde Local Plan to 2032. A scoping consultation was carried out between 25th April 2019 and 6th June 2019. The responses to this were considered and fed into a draft of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32. This was approved for publication by the Council's Planning Committee at the meeting of 11th March 2020. The publication consultation of the Partial Review of the FLP32 was delayed due to the COVID-19 restrictions, during which the publication would not have been possible in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, and was suspended at the time of the publication of the draft version of this document for consultation. The consultation on the Partial Review has now taken place³, and ran from 23rd July 2020 to 3rd September 2020.
- 2.7 The Council considers it necessary to undertake the Partial Review in order to fulfil the requirements of paragraph 212 of the Framework, which notes that plans may need to be revised to reflect policy changes that the replacement Framework has made. It also considers it is necessary as there is a trigger in paragraph 1.27 of the Local Plan requiring a review (whether full or partial) if the Wyre Local Plan is adopted with unmet need for housing, which has occurred. The remit of the Partial Review of the Fylde Local Plan to 2032 is not intended to extend beyond these two considerations.
- 2.8 The Partial Review includes revisions to reflect the change in methodology for calculating minimum local housing need in accordance with paragraph 60 of the Framework. In respect of the issue of Wyre's needs, it notes that the issue will be dealt with through Wyre's own partial review, which is required by the policies of the Wyre Local Plan, but it provides a contingency if Wyre's Partial Review fails to result in its needs being met.
- 2.9 For the purposes of this version of the Draft Position Statement, the appropriate housing requirement figure against which the supply will be measured is the lower figure of the range proposed as the housing requirement in the Partial Review, i.e. 275 net dwellings per annum.

National Planning Policy Framework

- 2.10 The current National Planning Policy Framework (the Framework, or where clarification is needed, the Framework (2019)⁴) was published in February 2019. The Framework (2019) makes only relatively minor changes to the previous version of the Framework published in July 2018 (the Framework (2018)⁵). The Framework (2018) however was a major rewriting of the earlier version of the Framework published in March 2012 (the Framework (2012)⁶). The references to sections of the Framework below relate to the Framework (2019) as that is the

³ <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/partial-review-of-the-fylde-local-plan-to-2032-flp32/>

⁴ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵

<https://webarchive.nationalarchives.gov.uk/20181206183454/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁶

<https://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

version which is represents current policy. Earlier versions are referred to within this document where relevant.

- 2.11 Paragraph 11 sets out the meaning of the presumption in favour of sustainable development, and the circumstances when Local Plan policies are deemed out of date allowing the presumption to apply. It refers to Footnote 7 which clarifies these circumstances to be in particular where a local planning authority cannot demonstrate a five-year supply of deliverable housing sites with the appropriate buffer, or where the Housing Delivery Test shows housing delivery below 75% of the requirement over three years.
- 2.12 Paragraph 12 notes the statutory status of an up-to-date adopted development plan as the starting point for decision-making, notwithstanding paragraph 11.
- 2.13 Paragraph 17 requires the development plan to include strategic policies to address the Council's priorities for land use. Paragraph 20 requires these strategic policies to provide for housing. Paragraph 23 requires strategic policies to provide a clear strategy for bringing sufficient land forward over the plan period.
- 2.14 Paragraph 60 requires the determination of the minimum number of homes needed through a local housing need assessment using the standard methodology in the PPG unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- 2.15 Paragraph 65 requires a housing requirement figure to be established in strategic policies.
- 2.16 Paragraph 67 requires planning policies to identify specific deliverable sites for years 1-5 of the plan period, together with specific developable sites or broad areas of growth for years 6-10 and where possible years 11-15.
- 2.17 Paragraph 70 allows for windfall sites to be included as an allowance to form part of anticipated supply.
- 2.18 Paragraph 73 states that Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of: a) 5% to ensure choice and competition in the market for land; or b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 2.19 Paragraph 74 relates directly to the Annual Position Statement. It states:

A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which: a) has been produced through engagement with developers and others who have an impact on delivery, and been considered by the Secretary of State; and b) incorporates the recommendation of the Secretary of State, where the position on specific sites could not be agreed during the engagement process.

- 2.20 Footnote 38 clarifies the meaning of “recently adopted” in paragraphs 73 and 74 to be until 31 October the following year in the case of a plan adopted between 1 May and 31 October.
- 2.21 Footnote 39 clarifies that the under-delivery of housing in paragraph 73c) will be measured through the Housing Delivery Test, where delivery is below 85% of the requirement.
- 2.22 Paragraph 75 requires local planning authorities to monitor build-out of sites, and to prepare an action plan where the Housing Delivery Test shows delivery below 95% of the requirement
- 2.23 Paragraph 212 notes that the new Framework replaces the previous Framework on the date of publication, and that plans may need to be revised to take account of changes, either by partial revision or preparation of a new plan.
- 2.24 Paragraph 213 allows due weight to policies in existing plans according to their consistency with the new Framework.
- 2.25 Paragraph 214 sets out transitional arrangement for local plans submitted for examination up to 24th January 2019, whereby they are to be examined under the Framework (2012).
- 2.26 Paragraph 215 sets out arrangements for the implementation of the Housing Delivery Test.
- 2.27 Glossary: “deliverable” is defined as

To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

Planning Practice Guidance (PPG)

Housing and economic land availability assessment (HELAA) PPG

Housing delivery: 5 year land supply paragraphs 028-054 (Reference ID: 3-028-20180913 to ID: 3-054-20180913)

- 2.28 This section provides guidance on the provision of a five years’ supply of housing both for the purpose of plan-making and decision-taking, including a section relating to Annual Position Statements.
- 2.29 Demonstrating supply

Authorities can use evidence such as a SHLAA/HELAA to identify suitable sites. Authorities will need to provide robust, up-to-date evidence to support plan preparation; judgements on the deliverability of housing sites including windfall sites will need to be clearly and transparently set out. Authorities may also consider how they can involve people with an interest in delivery in assessing the deliverability of sites. They may develop benchmarks and assumptions based on evidence of past trends for development lead-in times and build-out rates. Testing these assumptions with developers and using them to inform assessments of deliverability can also make deliverability assessments more robust.

2.30 Deliverable sites

For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- any progress being made towards the submission of an application;
- any progress with site assessment work; and
- any relevant information about site viability, ownership constraints or infrastructure provision.

For example:

- a statement of common ground between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates.
- a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.

2.31 Buffers

Additional sites should be brought forward from later in the plan period, over and above the level indicated by the strategic policy requirement, and any shortfall, or where applicable the local housing need figure:

- the minimum buffer for all authorities, necessary to apply ensure choice and competition in the market, where they are not seeking to confirm a 5 year land supply (and where delivery of housing over the previous 3 years, has not fallen below 85% of the requirement) is 5%;
- the buffer for authorities seeking to confirm a 5 year land supply, through an annual position statement or recently adopted plan (and where delivery of housing over the previous 3 years, has not fallen below 85%) is 10%; and
- the buffer for authorities where delivery of housing over the previous 3 years, has fallen below 85% of the requirement, is 20%

2.32 When a 5-year supply needs to be demonstrated

In principle an authority will need to be able to demonstrate a 5 year land supply at any point to deal with applications and appeals, unless it is choosing to confirm its 5 year land supply, in which case it need demonstrate it only once per year. If an authority cannot demonstrate a 5 year land supply, plus any relevant buffer, the presumption in favour of sustainable

development will apply, as set out in footnote 7 of the National Planning Policy Framework, to enable the development of alternative sites to meet the policy requirement.

2.33 Completions, allowances, shortfalls

Completions should be net of demolitions. Empty homes can be included providing the authority can demonstrate they had not already been counted as part of the existing stock of dwellings and would not be double counting. Student housing can be included towards meeting the housing requirement, based on the amount of accommodation released in the housing market. Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published census data.

Where shortfalls have occurred, authorities should consider the reasons for this. Shortfalls should be added to the 5-year supply (Sedgefield approach) unless a longer period is determined through the plan-making process. Over-delivery may be offset against previous shortfalls.

2.34 Annual position statement

Examination of DPDs which allocate housing sites will consider deliverability of sites to meet a 5 year supply, in a way that cannot be replicated in the course of determining individual applications and appeals. LPAs may need to develop assumptions and benchmarks to help inform and test assessments. Assumptions can include lapse/non-implementation rates in permissions, lead-in times and build rates, and these assumptions and yardsticks can be used to test delivery information or can be used where there is no information available from site owners/developers to inform the assessment. Assumptions should be based on clear evidence, consulted upon with stakeholders, including developers, and regularly reviewed and tested against actual performance on comparable sites. Tables of assumptions should be clear and transparent and available as part of assessments.

2.35 Evidence of delivery may need to differentiate between types and sizes of developers and of sites, and of type of product. This approach will ensure the assessment of delivery on sites will be as robust as possible.

2.36 Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include:

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;
- for small sites, details of their current planning status and record of completions and homes under construction by site;
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear evidence that there will be housing

completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;

- permissions granted for windfall development by year and how this compares with the windfall allowance;
- details of demolitions and planned demolitions which will have an impact on net completions;
- total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and
- the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply.

2.37 The Framework allows LPAs to demonstrate a confirmed 5-years' supply through the local plan examination, which may then be refreshed annually following adoption (provided the plan remains up-to-date) through the annual position statement process.

2.38 LPAs must notify the Planning Inspectorate by 1st April each year that they wish to produce an annual position statement to submit for confirmation; it should be subject to engagement and submitted by 31st July.

2.39 The Planning Inspectorate will consider whether the correct process has been followed, and whether the evidence demonstrates a 5-year supply of deliverable housing sites, with appropriate buffer, at the 1st April base date. The assessment will be based on written material submitted with no further reference back or dialogue with stakeholders. It is therefore important that the LPA has carried out a robust stakeholder engagement process and that adequate information is provided about disputed sites. Provided the correct process has been followed and sufficient information has been provided about any disputed sites, the Planning Inspectorate will issue their recommendation in October of the same year, confirming, if appropriate, the housing land supply until the following October.

2.40 An engagement statement should be submitted including:

- an overview of the process of engagement with site owners/applicants, developers and other stakeholders and a schedule of site-based data resulting from this;
- specific identification of any disputed sites where consensus on likely delivery has not been reached, including sufficient evidence in support of and opposition to the disputed site(s) to allow a Planning Inspector to reach a reasoned conclusion; as well as an indication of the impact of any disputed sites on the number of years of supply;
- the conclusions which have been reached on each site by the LPA in consideration of the outcome of stakeholder engagement;
- the conclusions which have been reached about the overall 5 year land supply position.

2.41 Engagement should reflect the Statement of Community Involvement but should include, where the LPA consider appropriate:

- potentially interested specific consultation bodies;

- general consultation bodies considered appropriate;
- small and large developers;
- land promoters;
- private and public land owners;
- infrastructure providers (such as utility providers, highways, etc);
- upper tier authorities (county councils) in two-tier areas;
- neighbouring authorities with adjoining or cross-boundary sites.

2.42 LPAs should seek as much agreement as possible on the potential delivery from sites which contribute to the 5 year housing land supply. Where there is disagreement, where the LPA is seeking confirmation of the 5 year supply, the Planning Inspectorate will consider the evidence provided by the LPA and stakeholders and make recommendations about likely site delivery in relation to those sites in dispute.

2.43 Planning Inspectorate conclusion and recommendations

The Planning Inspectorate will assess whether the evidence provided by the LPA in support of their annual position statement is sufficient to demonstrate a 5 year supply including appropriate buffer; if so, they will confirm that the LPA has a 5 year supply for 1 year; this will be a material consideration in the determination of planning applications and appeals; the LPA will need to publish the annual position statement, the recommendations and the LPA's decision on the recommendations. For plans adopted between 1 May and 31 October, the confirmed status of the 5 year land supply will remain in place until 31 October of the following year.

Housing Delivery Test paragraphs 055-075 (Reference ID: 3-055-20180913 to ID: 3-075-20180913)

2.44 The Housing Delivery Test, published in the November of any given year, provides a measure based on the preceding 3 financial years. It applies to authorities with plan-making and decision-taking responsibilities. If delivery of housing falls below the housing requirement, then certain policies will apply with immediate effect from publication of the Housing Delivery Test results, depending on the level of delivery: the publication of an action plan if housing delivery falls below 95%; a 20% buffer on a local planning authority's 5-year land supply if housing delivery falls below 85%; and the presumption in favour of sustainable development if housing delivery falls below 75%, once transitional arrangements have ended.

Housing Delivery Test Measurement Rule Book

2.45 This separate publication which is referenced by the PPG provides detailed guidance on how the housing delivery test will be calculated.

Housing and Economic Needs Assessment PPG

Housing Need paragraphs 001-016 (Reference ID: 2a-001-20190220 to ID: 2a-016-20190220)

- 2.46 This section provides detail on the standard methodology for calculating housing need and circumstances where an alternative approach is acceptable.

Written Ministerial Statement

Lord Greenhalgh, 13th May 2020⁷

- 2.47 Requires a swift and positive response from Local Planning Authorities to requests made for extended working hours, to allow developers to proceed at pace with work otherwise delayed as a result of COVID-19.

Court Case Regarding the Interpretation of the Framework

East Northamptonshire Council (Claimant) v SoSHCLG (Defendant) and Lourett Developments Ltd (Interested Party) (High Court Of Justice Claim No. Co/917/2020 Queen’s Bench Division Planning Court)

- 2.48 This was a case regarding the interpretation of the meaning of “deliverable” in relation to its use for the determination of the five-year housing land supply in relation to an appeal case at 7-12 The Willows, Thrapston in East Northamptonshire district. In his decision letter (attached for reference as Appendix 7, available online through planning application 18/02459/OUT on East Northamptonshire’s public access to planning applications⁸), the Inspector stated (in paragraph 36) that “at least 774 homes can immediately be removed from the Council’s housing land supply” as they fell outside the categories (a) and (b) of the definition in the Glossary of the Framework.
- 2.49 The Secretary of State agreed to the quashing of the report and decision on the sole grounds of the Inspector’s interpretation of the definition as a closed list. The Consent Order⁹ attached as Appendix 6 to this Draft APS states as follows:

The Defendant has carefully considered the Inspector’s decision and the Claimant’s Statement of Facts and Grounds and Reply, and the evidence served in support. He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework (“NPPF”) as a ‘closed list’. It is not. The proper interpretation of the definition is that any site which can be shown to be ‘available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years’ will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.

⁷ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2020-05-13/HLWS230/>

⁸ <https://publicaccess.east-northamptonshire.gov.uk/online-applications>

⁹ <https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf>

2.50 The consequence of this decision is that it provides the interpretation through the direct statement produced by the Secretary of State above, that unequivocally notes that:

- the definition of deliverable is not two closed lists, a) and b);
- whether a site meets the definition is a matter of planning judgement on the evidence available.

3. Background to the Annual Position Statement 2020

- 3.1 The Fylde Local Plan to 2032 was adopted on 22nd October 2018. The Local Plan was submitted for Examination in December 2016 and underwent three stages of hearings during 2017. Following the publication of the revised Framework in July 2018, the Examination was concluded under the transitional arrangements under paragraph 214 of the Framework (2018). The Local Plan was found sound in September 2018. The Inspector's Report is available on the Council's website¹⁰.
- 3.2 In accordance with paragraph 212 of the Framework, the Council is undertaking a Partial Review to ensure that Local Plan policies remain in accordance with national policy going forward, thereby keeping the Local Plan up-to-date. The Council consulted on the scope of the Partial Review between 25th April 2019 and 6th June 2019 and a draft of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 was approved for publication by the Council's Planning Committee at the meeting of 11th March 2020. The Publication (reg. 19) consultation¹¹ commenced on 23rd July 2020.
- 3.3 Paragraph 73 of the Framework (2019) states that Council should identify and update annually a supply of deliverable sites sufficient to provide five years' worth of housing against the housing requirement set out in adopted strategic policies, unless the strategic policies are more than 5 years old. The Local Plan includes an adopted strategic policy that provides a housing requirement figure for the Borough for the period to 2032: the adopted Local Plan Policy H1 sets a minimum housing requirement of 415 net dwellings per annum.
- 3.4 The Framework (2019) paragraph 60 requires that the minimum number of homes needed should be informed by a local housing need assessment, using the standard methodology. As the Local Plan was prepared under the 2012 Framework, this was not undertaken during the preparation of the Local Plan. The Local Plan has been adopted under the transitional arrangements, with the housing need having been assessed under the 2012 Framework and been found sound. Therefore, the assessment of need made in the Fylde Coast SHMA and its three addenda, as evidence for the Local Plan, represents an alternative approach justified in exceptional circumstances in accordance with paragraph 60 of the Framework, pending the adoption of the Partial Review of the FLP32.
- 3.5 However, the Partial Review makes an assessment, in the Housing Needs and Requirement Background Paper 2020¹², and the consequences of this assessment are a change to the housing requirement figure. This is reflected in the revised policies and supporting text contained within the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32¹³. For the purposes of reference, the calculation is presented in Table 1a below. A further calculation, presented as Table 1b below, shows an updated calculation from that used

¹⁰ <https://new.fylde.gov.uk/adopted-local-plan-to-2032/>

¹¹ <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/partial-review-of-the-fylde-local-plan-to-2032-flp32/>

¹²

<https://fylde.cmis.uk.com/fylde/MeetingsCalendar/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1124/Committee/20/Default.aspx>

¹³ *ibid.*

in the Housing Needs and Requirement Background Paper and the Partial Review, reflecting the base date for this document and the availability of updated affordability data.

- 3.6 The Partial Review of the FLP32 proposes to amend the annual housing requirement in the Local Plan to be a range of 275-415, this being based on the standard method at the lower end, which meets identified needs in line with updated national policy, and the adopted Local Plan at the upper end, to support the delivery of development sites allocated within the Local Plan.
- 3.7 This version of the Draft APS considers the 5 year supply position against the emerging housing requirement proposed through the Partial Review of the FLP32. It therefore takes the lower figure in the range of 275 as the annual requirement, in line with PPG.

Table 1a: Local Housing Need Figure Calculation (2019, as used in Partial Review)		
Household growth projections	2019	37,181
	2029	39,714
Annual projection	$(39,714 - 37,181) / 10$	253.3 rounded to 253
Median workplace-based affordability ratio	2018	5.36
Adjustment factor	$((5.36 - 4) / 4) \times 0.25$	0.085
Calculation	$(1 + 0.085) \times 253$	275
The cap	1.4×253	354 (doesn't apply: the cap is higher than 275, therefore 275 stands)

Table 1b: Local Housing Need Figure Calculation: updated for base date 1/4/2020		
Household growth projections	2020	37,454
	2030	39,953
Annual projection	$(39,953 - 37,454) / 10$	249.9 rounded to 250
Median workplace-based affordability ratio	2019 (latest) ¹⁴	5.43
Adjustment factor	$((5.43 - 4) / 4) \times 0.25$	0.089
Calculation	$(1 + 0.089) \times 250$	272
The cap	1.4×250	350 (doesn't apply: the cap is higher than 272, therefore 272 stands)

Previous 5 Year Supply Position

- 3.8 The Local Plan was adopted on 22nd October 2018. The Local Plan was therefore recently adopted in accordance with Footnote 38 of the Framework (2018), until 31st October 2019. Under paragraph 74 of the Framework (2019), a five-year supply of deliverable housing sites can be demonstrated where it has been established in a recently adopted plan. Therefore, the Council had an established five-year supply of deliverable housing sites between 22nd October 2018 and 31st October 2019.
- 3.9 For the base date 1st April 2019, Fylde Council prepared and submitted a Draft Annual Position Statement on 31st July 2019. The Planning Inspectorate issued an inspector's recommendations to the Council on 15th January 2020; this was challenged in the High Court by the Council, and quashed through a Court Order¹⁵ on 1st April 2020. The Planning Inspectorate issued a further inspector's report¹⁶ on 6th May 2020 which confirmed that the Council had a five-year supply of deliverable housing sites for base date 1st April 2019. The Council has incorporated the inspector's recommendations into its APS¹⁷. The confirmation retains effect until 31st October 2020.
- 3.10 The Council has sought to establish a five-year housing land supply for a further year from that date, through its submitted Annual Position Statement 2020. It seeks to establish a five year supply through the adoption of the Partial Review of the FLP32, through this statement.

¹⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

¹⁵ <https://new.fylde.gov.uk/wp-content/uploads/2020/04/Sealed-Court-Order-quashing-Report.pdf>

¹⁶ <https://new.fylde.gov.uk/wp-content/uploads/2020/05/Fylde-APS-Report-Reconsideration-6-May-20.pdf>

¹⁷ <https://new.fylde.gov.uk/wp-content/uploads/2020/05/Fylde-Council-APS-base-date-1st-April-2019-final-May-2020.pdf>

Housing Delivery Test

3.11 Paragraph 75 of the Framework (2019) requires Councils to monitor the delivery of sites which have permission. The Housing Delivery Test, published annually by the Government, assesses the performance of the development industry in delivering sites across each local authority area, against the dwellings required by the adopted strategic policies for each area. Where delivery falls short, the Framework specifies that Councils must either produce an action plan (below 95% of the requirement, paragraph 75 of the Framework); add a 20% buffer to the 5-year housing land supply (below 85% of the requirement, footnote 39 of the Framework); or the presumption in favour of sustainable development will apply under paragraph 11d) of the Framework (below 75% of the requirement, footnote 7 of the Framework).

3.12 The results are set out in Tables 2 and 3 below.

Table 2: Housing Delivery Test Results for 2018¹⁸		
Numerator: housing delivery	308 ¹⁹ + 455 + 512 ²⁰	1,276
Denominator: household projections:		
2015/16	(38,174 – 35,776)/10	240
2016/17	(38,404 – 36,021)/10	238
2017/18	(39,256 – 36,628)/10	263
Total		741
Result	1,276/741 %	172%

¹⁸ As published by MHCLG: <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

¹⁹ Data from the Housing Flow Reconciliation Return, which does not include adjustments made in the Housing Trajectory attached to this statement

²⁰ As above, in this case the figure is composed of the raw total 470 plus 42 calculated from 76 bedrooms of communal accommodation divided by the national ratio of 1.8 (see the Technical Note on <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>)

Table 3: Housing Delivery Test for 2019²¹		
Numerator: housing delivery	455 + 512 + 471	1,438
Denominator: household projections:		
2016/17	(38,404 – 36,021)/10	238
2017/18	(39,256 – 36,628)/10	263
2018/19	Local housing need ²²	287
Total		788
Result	(1,438/788) %	183%

3.13 The implications of the housing delivery test result are that no further uplift on the buffer to the 5-year housing land supply is required under footnote 39 of the Framework.

²¹ As published by MHCLG <https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

²² This is the 2018 figure based on data for the year before the data in Table 1a.

4. The Council's methodology

- 4.1 The Council's methodology for the calculation of the five-year housing land supply has been adapted from the approach previously established through the Local Plan Examination, reflecting necessary changes in the light of the 2018 and 2019 Frameworks, and to reflect the prescriptions of updated Planning Practice Guidance.

Components of the calculation

- 4.2 The calculation has two sides: the requirement and the supply. The requirement comprises the annual housing requirement, any shortfall and the required buffer. The supply comprises the list of specific deliverable sites with information as to the number of dwellings which will be delivered within 5 years and when, with any allowances taken account of. How each of these has been determined is detailed below.

The annual housing requirement

- 4.3 Paragraph 73 of the Framework (2019) states that the supply should be sufficient to provide five years' worth of housing against the housing requirement set out in adopted strategic policies, unless the strategic policies are more than 5 years old. The adopted Local Plan policy H1 sets a minimum housing requirement of 415 net dwellings per annum. This figure is therefore the annual housing requirement for the purposes of the calculation in accordance with the Framework paragraph 73.

The shortfall

- 4.4 Shortfall is calculated from the base date of the Local Plan (in accordance with para. 044 of PPG on HELAA). The annual requirement figure of 415 is rebased in the Local Plan to include shortfall from early in the plan period, before the examination took place. The Local Plan spreads this shortfall over the remainder of the plan period (Liverpool method), resulting in a residual requirement from 1st April 2017 of 479 dwellings per annum. This approach has been found sound at the Examination in Public and is written into the statutory adopted development plan in Policy H1 and its supporting text, as explained in Section 2 of this Draft PS.
- 4.5 Delivery in the two years from 1st April 2017 to 31st March 2019 has been 463 and 490 net homes respectively. This leaves a shortfall of 5 against the residual requirement. The residual requirement reduces the overall shortfall by 128, to 828 as at 31st March 2019.
- 4.6 The Partial Review amends the annual housing requirement from 1st April 2019 onwards, to a range of 275-415. In accordance with PPG, Paragraph: 027 Reference ID: 68-027-20190722, the lower end of the range is used for calculating the housing requirement for the 5 year supply. The Partial Review retains the use of the Liverpool method for addressing previous shortfall. The lower end of the residual requirement becomes $275 + 828/13 = 339$.
- 4.7 Delivery in 2019-20 was 634 which provides a surplus against the residual requirement of 295. This, combined with the shortfall of 5 against the residual requirement in 2017-2019, can be

set against the shortfall within the 5 year requirement in accordance with PPG Paragraph: 032 Reference ID: 68-032-20190722.

- 4.8 The five year requirement incorporating shortfall is therefore 5×339 , minus the surplus from the last three years, which gives 1,405 net dwellings.

The buffer

- 4.9 The Framework (paragraph 73) sets out the requirement for the supply of deliverable sites to be augmented by a buffer, to ensure choice and competition in the market for land, brought forward from later in the plan period. The standard requirement is for a 5% buffer, with a 10% buffer applicable where the Local Planning Authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan to account for any fluctuations in the market during that year, or a 20% buffer where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.
- 4.10 The Council, in bringing forward this annual position statement, proposes the addition of a 10% buffer in accordance with paragraph 73b) of the Framework. The percentage is applied to the requirement including any shortfall in order to calculate the buffer. This results in an addition to the requirement of 141 dwellings.
- 4.11 A larger buffer of 20% is required where housing delivery has fallen short of 85% of the requirement as calculated in the housing delivery test. As stated in section 3 above, this does not apply to Fylde at present.

Deliverable sites

- 4.12 The five years' supply must consist of specific deliverable sites under paragraph 73 of the Framework. The Council has determined the sites to be included within the 5 years' supply having regard to the Local Plan and its Examination, the current planning status of sites and their prospects of implementation, and the revisions to the definition of a deliverable site made by the Framework (2018) and retained in the Framework (2019). The Council has also had regard to the APS process carried out for the Council's APS base dated 1st April 2019, in particular the outcomes of the engagement and the Inspector's conclusions on disputed sites.
- 4.13 Sites included in the Local Plan were included within earlier versions of the Council's Housing Land Supply Statement, and evidence for their deliverability was considered through the Examination of the Local Plan. The Local Plan was found to include a five-year housing land supply and was found to be sound on the basis of the inclusion of these sites.
- 4.14 In earlier versions of the Housing Land Supply Statement, only those sites of 10 or more dwellings were specifically listed within the trajectory. Smaller sites were included as a total. However, the PPG requires that, in an Annual Position Statement, details of the planning status of each small site and a record of completions and homes under construction at each small site is provided. Therefore, the housing trajectories were expanded for this the 2019 APS from those previously published, to include all small sites included within the supply.

- 4.15 The definition of deliverable in the Framework (2018 and 2019) is significantly different to that in the Framework (2012). The revised definition dismisses sites which are major development and do not have full planning permission, and smaller sites without planning permission, unless there is clear evidence that housing completions will begin on the site within five years.
- 4.16 The sites included have been updated to reflect their current planning status as at the base date of 1st April 2020, and based on this, their deliverability has been reassessed. The sites included in the 5-year supply consist of those sites with full planning permission, and those where both outline and reserved matters permission has been granted. Sites that would have been included under previous methodologies have been removed. Any further information is taken into account when determining whether a site is to be included. Other sites are omitted unless there is clear evidence that delivery will commence within 5 years.
- 4.17 The Council therefore concludes that the list of sites assessed to be deliverable, which is shown by the yellow and green highlighting in Appendix 1, is highly robust, having taken a precise and considered approach in line with the requirements of the Framework and the PPG. The list of sites included is also shown in Appendix 2 which also includes all Local Plan sites.
- 4.18 The justification for the inclusion of each site is included in Appendix 1. Further explanation is given where necessary in response to representors in the disputed sites list in Appendix 3 (Engagement Statement).

Lead-in times and delivery rates

- 4.19 The approach of the Council to lead-in times and build out rates on sites has been developed through earlier engagement, then through the Examination of the Local Plan and subsequent reassessment in the light of the Framework (2018 and 2019). These have been adjusted again to reflect delivery and engagement through the 2019 APS, and then again to reflect delivery in 2019-20. Further adjustments have been made where necessary in the light of consultation on this document.
- 4.20 The starting point for the lead-in times and build-out rates are the assumptions developed through the Local Plan evidence base, specifically through the SHLAA Steering Group. This involved input from stakeholders including developers. The base assumptions developed for lead-in times are:

Site Status		Assumed Year of Commencement
Full planning permission, or both outline and reserved matters permission, with signed Section 106		Year 1
Full planning permission, awaiting signing of Section 106	Where there is clear evidence that homes will be	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 allocation in Local Plan	delivered within 5 years	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

- 4.21 In respect of build-out rates, the base assumptions developed through the SHLAA Steering Group are that 15 dwellings will be built in the first year and 30 dwellings in subsequent years. If the site has a capacity of more than 300 dwellings then it assumes that there will be two developers and the output will be doubled.
- 4.22 During the Local Plan to 2032 Examination in Public Hearing Sessions the Council agreed to amend its approach to build out rates and phasing. Where detailed further information about a specific site was provided by the site owners, developers or agents, the Council took this into account and prescribed build out rates and phasing accordingly. Where there was sufficient evidence that an established development site is delivering at a rate that is at variance to the general delivery assumptions, these site-specific build-out rates were assumed for the remaining units of the development site. In all other circumstances the Council continued to rely upon the approach agreed through the SHLAA Steering Group.
- 4.23 The approach set out above was used to construct the Local Plan trajectory and to demonstrate a 5-year housing land supply for the purposes of the Examination of the Local Plan. The Local Plan was found sound on this basis²³. During the Engagement process, a representor has noted that there have been subsequent changes to PPG that affects the relevance of assumptions. The revised PPG for HELAA (Paragraph: 022 Reference ID: 3-022-20190722) states:

Information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.

This is fully in accordance with the Council’s approach, which makes use of the outcome of the consideration of delivery on sites in the Local Plan Examination. The indicative lead-in times and delivery rates used by the Council at the outset were modified in response to information from developers on individual sites, through the Examination process.

- 4.24 The publication of the Framework (2018) and the subsequent update through the Framework (2019) has led to the revision of the definition of “deliverable”. The Council has consequently lengthened the projected lead-in times for sites that no longer fall under the definition of deliverable within the plan period trajectory, so that they are not shown as delivering within 5 years, unless there is evidence in support of earlier delivery.
- 4.25 The Council’s data on completions and homes under construction for the year up to the current base date of 1st April 2020 has been added to the previous trajectories. In conjunction

²³ <https://new.fylde.gov.uk/adopted-local-plan-to-2032/>

with this, consequential revisions to the projected delivery over the forthcoming years have been made. In addition, updates to the planning status of sites have been made, including where planning permission has lapsed, and this information has been used to amend projected lead-in times where applicable.

- 4.26 The engagement process, including the consultation on the draft version of this document, invited site promoters to provide updated information on their likely commencement of delivery/ delivery rates going forward.
- 4.27 It is recognised that there is a degree of uncertainty as to the impact of the COVID-19 lockdown period. The majority of development sites shut for a two-month period, which on a pro-rata basis would be equivalent to one-sixth of a year's delivery. To take account of the effects of restarting and to make for a robust assessment, the Council has considered the effects on the basis of a delay of three months to actual delivery, where delivery has already commenced. This accords with the response made by the representor Emery Planning on behalf of Wainhomes, detailed in the Engagement Statement. On a site delivering the standard assumption rate of 30 dwellings per annum, this would amount to 8 dwellings, and would give delivery of 22 rather than 30 dwellings in the current year, with the 8 dwellings added to the end of the period of delivery. For the submission version of this Draft APS and this iteration as Position Statement for the Partial Review, this adjustment has been applied to all sites that were commenced by the lockdown. However, in terms of impact on the supply over 5 years, a number of sites will end during the five-year period and therefore delivery on those sites within the five years would not be affected. On other sites, commercial imperatives may encourage developers to make up for lost delivery over a period, which is unlikely to exceed five years.
- 4.28 There is some concern over the economic impact of COVID-19 on the overall housing market, but it is much too early to make any assessment and it cannot be justified to make a revision to housing delivery via a blanket approach on the basis of macro-economic outlook and its impact on overall housing demand at this stage. It should be noted that at the base date 1st April 2020, one week into the lockdown, no rational analysis of the position was possible. Immediate economic support measures were put in place at lockdown in order to prevent mass job losses, such as the furlough scheme. The Chancellor has announced a broad package of economic stimulus measures designed to boost macro-economic demand to prevent significant medium and longer-term effects on the economy as a whole, which in particular has included the removal of stamp duty, which removes what is a frictional tax on the housing market particularly on homes priced at the typical market housing being newly-built in the borough, and is likely to encourage transactions in the market.
- 4.29 Therefore, in relation to site-by-site impacts, individual site developers were invited through the emails circulated prior to the drafting of this document, and through the public consultation that took place on the consultation draft of this document, to comment on the extent to which the existing delivery rates on their sites are likely to be impacted, if at all. Where information in this regard has been provided it has been incorporated into the trajectories in Appendices 1 and 2 and is noted in the Engagement Statement (Appendix 3).
- 4.30 The PPG requires that commentary is provided indicating reasons why a site has either exceeded or not progressed as expected. Comments are provided in this edition on the basis of known information. Information provided on request from developers/landowners and their agents through the initial email circular, and further information provided by site

owners/developers in response to the consultation draft version of this document, have been considered for incorporation into Appendices 1 and 2 and are noted in Appendix 3 (Engagement Statement).

Development not implemented

- 4.31 The trajectories in Appendices 1 and 2 and supporting delivery information in Appendix 1 supports the conclusion that in the case of large sites (10 or more dwellings), there is a sufficiently realistic prospect of delivery, that an allowance for non-delivery would not be appropriate. This is in accordance with the previous assessment carried out through the Examination of the Local Plan, which was found sound without any requirement for any discount for non-implementation.
- 4.32 At the Examination of the Local Plan the evidence presented into the deliverability of small sites involved the inclusion within the trajectories of the total number of committed dwellings on small sites (i.e. those granted any kind of planning permission), this number was discounted by 10%, to account for small sites not coming forward.
- 4.33 The trajectory in Appendix 1 includes all small sites listed individually, as required by PPG, and reflects the updated definition of deliverable sites within the Framework (2018 and 2019). In particular, under part a) of the new definition of deliverable, small sites with planning permission (including outline planning permission) should be considered deliverable until permission expires unless there is clear evidence that the dwellings will not be delivered within 5 years. Any cases where such information exists are noted within Appendix 1, and delivery is amended in Appendices 1 and 2 accordingly. All other small sites with planning permission are treated as deliverable in accordance with Annex 2 of the Framework. It follows that no discount would be justified for non-implementation of these sites. This conclusion was supported in the Inspector's report to the 2019 Draft APS.

Small sites windfall allowance

- 4.34 Small sites are not allocated in the Local Plan but an allowance is made for them to come forward as windfalls. In the 5-year supply, small sites with planning permission have been listed, in accordance with PPG: under the standard assumptions these are expected to come forward within the first three years (as the sites are shown in accordance with standard assumptions the majority are shown in year 1). The sites listed include those where net losses are anticipated. An analysis of previous planning permissions coming forward in regard to small 'windfall' sites has revealed that it is likely that at least 40 net dwellings per annum will be delivered. An allowance is therefore made of 40 net homes per annum for small sites to come forward in years 4 and 5 to reflect the Local Plan and past windfall delivery rates. This has not been discounted as it is based upon historic delivery rates rather than planning permissions granted. The inclusion of this allowance was supported by the Local Plan Inspector and by the Inspector of the 2019 Draft APS.
- 4.35 The allowance of a 40 dwellings per annum windfall delivery rate was considered at the Local Plan Examination and found sound. Policy DLF1 of the adopted Local Plan states:

Windfalls (including small committed sites)

Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum in years 10 to 21 of the plan. The delivery of small sites that are already committed is included within the Housing Trajectory (Appendix 2): this provides for the delivery of small sites up to year 10 of the plan. Small committed sites and windfalls yet to come will provide around 1040 homes within the plan period (11% of the housing requirement). There may also be some larger windfall sites that will also contribute to this figure.

4.36 The Inspector noted in paragraph 84 that:

... the inclusion of a small 40 dpa windfall allowance for the latter 2 years of the 5 year period is also justified by the evidence

Planning permissions granted for windfall development in recent years is shown below. It should be noted that the data here is drawn from the sites which are new commitments as at 31st March each year, and so excludes any sites permitted and completed within the same year to March 31st.

Table 4: Windfalls Permitted	
Year to 31 March	
2020	72
2019	62
2018	91
2017	110
2016	109
2015	104
2014	54

4.37 An allowance for demolitions/losses not relating to sites for new housing is included for the five years of one unit per annum. The one unit per annum is based on evidence of the five units lost over the first seven years of the plan period. This approach follows last year's APS and the Local Plan.

5. Draft Five-Year Housing Land Supply Calculation

5 Year Requirement		
Partial Review Residual Housing Requirement incorporating earlier shortfall	5 x 339	1,695
Delivery since the Local Plan rebasing April 2017-March 2019	463 + 490	953
Residual requirement for the period since rebasing April 2017 – March 2019	479 x 2	958
Surplus or shortfall since the Local Plan rebasing	953 – 958	-5
Delivery since commencement of Partial Review residual requirement April 2019	634	634
Residual requirement under Partial Review April 2019 onwards	339	339
Surplus or shortfall since commencement of Partial Review residual requirement	634 – 339	295
Five year housing requirement including share of shortfall from start of the Local Plan period (2011)	1,695 + 5 - 295	1,405
10% buffer as required for the fixing of the five year supply through the Annual Position Statement	1,405 / 10	141
Five year housing land supply requirement including shortfall and buffer	1,405 + 141	1,546
Annualised housing land supply required	1,546 / 5	309
5-Year Supply		
Five Year Supply of Deliverable sites		2,727
Allowance for windfall sites	40 x 2	80
Demolitions allowance	-1 x 5	-5
Total supply		2,802
Over/under supply	2,802 – 1,546	1,256
Equivalent years' supply	2,802 / 309	9.07 years

6. Consultation Details

- 6.1 The consultation draft version of this document set out details of the consultation and how to respond. Details are provided in the Engagement Statement (Appendix 3)

Appendix 1

Draft five-year housing trajectory

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
SL1 - Lytham and St Annes Strategic Location for Development																											
Queensway, St Annes	HSS1	1A782	08/0058 OL 15/400 RM 13/0257 RM 17/862 FULL				948	948	53	895	869	66	0	0	0	0	0	13	40	27	26	36	27	9	Local Plan allocated site. Full planning permission for 948 dwellings, through a combination of consents; an extensive area of land was provided as habitat as mitigation for loss of bird habitat: this has been completed. The site is owned by a single developer. Construction of the initial phase has proceeded. Delivery on site limited to numbers shown within 5-year period due to need to agree and deliver revised vehicular access and section of spine road. The developer has applied to discharge conditions relating to the larger phase of the scheme. The developer has applied for and been granted planning permission for the main highway junction required to provide access to the larger phase of the scheme. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19		
Lytham Quays, Lytham	HSS3	1A200 1A354 1A735	02/0641 OL 06/0074 RM 09/0659 OL 11/0374 RM				120	120	120	0	0	0	5	22	48	40	4	0	1	0	0	0	0	0	0		
Heyhouses Lane, St Annes	MUS4	1A783	12/0465 OL 13/0448 RM 20/0183 FULL				158	158	130	28	0	28	0	0	0	10	33	60	27	0	0	0	15	13	0	0	Local Plan allocated site. Last element of phase 1 of the site is subject of current full planning application (received 16/3/2020) for 28 dwellings, 100% affordable, applicant is Registered Provider, to be considered by the Council's Planning Committee with a recommendation to approve in June 2020, with no S106 needed. Addendum note: this application was approved at the 24th June 2020 committee meeting, and the decision issued on 25th June 2020.
Heyhouses Lane, St Annes	MUS4	1A783	15/0787 OL 18/0096 OL 19/157 OL 19/815 RM				146	146	0	146	146	0	0	0	0	0	0	0	0	0	15	30	30	30	30	Local Plan allocated site, second phase of site. Reserved matters planning permission granted 13/2/2020. Condition discharge application received before base date and since determined. A technical start has been made.	
Queen Mary School, Clifton Drive South, St Annes	HS1	1A439	03/0157 COU				35	35	35	0	0	0	21	14	0	0	0	0	0	0	0	0	0	0	0		
Jubilee House, East Beach, Lytham	HS2	1A847	13/0001 FULL				20	20	0	20	0	20	0	0	0	0	0	0	0	0	15	5	0	0	0	Local Plan allocated site. Full planning permission.	
Ashton Nurseries, Mythop Road, Lytham	HS3	1A858	07/1264 OL 16/0413 FULL 17/0435 FULL				12	12	0	12	0	12	0	0	0	0	0	0	0	0	12	0	0	0	0	Local Plan allocated site. Full planning permission.	
The Gables, 35-39 Orchard Road, St Annes	HS4	1A594	05/0648 FULL 16/0639 FULL				19	19	19	0	0	0	0	0	0	0	0	0	7	12	0	0	0	0	0		
7-8 St Georges Square, St Annes	HS5	1A760	10/0891 COU				11	11	11	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0		
Petros House, St Andrews Road North, St Annes	HS7	1A931	14/0418 COU				35	35	35	0	0	0	0	0	0	0	0	0	0	35	0	0	0	0	0		
35-37 South Promenade, St Annes	HS8	1A1003	14/0327 FULL				36	36	36	0	0	0	0	0	0	0	36	0	0	0	0	0	0	0	0		
23 - 33 Fairhaven Road, St Annes	HS9	1A990	14/0320 FULL				32	32	32	0	0	0	0	0	0	0	0	0	32	0	0	0	0	0	0		
34-36 Orchard Road, Lytham St Annes	HS10	1A998	15/0176 OL	12				12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
The Galleries, 2-4 Kingsway, Lytham	HS11	1A1010	15/0486 FULL 18/0966 FULL				9	9	0	9	0	9	0	0	0	0	0	0	0	0	9	0	0	0	0	Local plan allocated site. Full planning permission granted 13/2/2019	
Fairways, Heeley Road, St Annes	HS12		08/0092 OL				20	20	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Kingsway Garage, St Annes	HS13		11/0667 OL				30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Axa, Lytham	HS14		13/0152 OL 17/0738 FULL				65	65	0	65	0	65	0	0	0	0	0	0	0	0	15	30	20	0	0	Local Plan allocated site. Full planning permission granted 5/3/2018 for 65 specialised apartments for the elderly. Condition discharge applications received and granted. Non-material amendment application for alteration to roof design received 14/1/2020, granted 25/2/2020. Site cleared in preparation.	
Land to the West, Ballam Road, Lytham	HS15	1A842	13/0161 FULL 14/0161 FULL				12	12	5	7	7	0	0	0	0	0	3	0	2	0	7	0	0	0	0	Local Plan allocated site. Full planning permission. Construction commenced.	
353 Clifton Drive North, St Annes	HS16	1A658	11/0312 FULL				34	34	34	0	0	0	0	0	20	14	0	0	0	0	0	0	0	0	0		
Hastings Point, Ballam Road, Lytham	HS17	1A592	03/0157 FULL				25	25	25	0	0	0	0	0	21	4	0	0	0	0	0	0	0	0	0		
Former FBC Depot, St Davids Road North, St Annes	HS18	1A755	12/0537 FULL				32	32	32	0	0	0	0	0	0	32	0	0	0	0	0	0	0	0	0		
1 Lord Street, St Annes	HS19	1A932	14/0178 FULL				14	14	14	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0		
Former Kwik Save, St Annes	HS20	1A943	14/0790 FULL				15	15	15	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0		
Westmoreland House, 29-31 Orchard Road, St Annes	HSS8		16/0285 PA 16/0470 FULL	25				25	0	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0	0		

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Land to East Sefton Road, Lytham St Annes	HS59		16/0239 FULL				12	12	12	0	0	0	0	0	0	12	0	0	0	0	0	0	0	0	0		
Valentines Kennels, Wildings Lane, St Annes	HS60		16/0903 OL 19/0642 FULL			114		114	0	114	0	114	0	0	0	0	0	0	0	0	0	114	0		Local Plan allocated site. Council resolved at committee 15/1/2020 to approve application, subject to S106, adoption of shadow HRA (agreed) and planning conditions, for full planning permission for two storey c2 care village with 205 bedrooms, communal lounge and dining areas, residents library, cinema room and salon plus outside recreation area and car parking. Equivalent to 114 dwelling units in accordance with PPG.		
Land at Roseacre, Wilding Lane, St Annes	HS61		16/0061 FULL	45				45	0	45	0	0	0	0	0	0	0	0	0	0	15	30	0		Local Plan allocated site. Full planning permission. Addendum: a respondent has noted that the date on the planning permission shows 2016, meaning that it has expired. The date was entered wrongly as the application was not actually decided until November 2017. The Council maintains that the site will deliver within 5 years, but a new permission will be required, and to reflect that delivery has been put back to 2022-23		
Keenans Mill, Lord Street, Lytham St Annes	HS62	1A1053	16/0905 FULL				26	26	26	0	0	0	0	0	26	0	0	0	0	0	0	0	0	0			
St Leonards Bridge Garage, St. Leonards Road East, Lytham St Annes	HS67		17/0299 OL			32		32	0	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Church Road Methodist Church, Church Road, S. Annes	HS68		17/0665 FULL			10		10	10	0	0	0	0	0	0	0	0	10	0	0	0	0	0	0			
Hole in One, Forest Drive, Lytham St Annes			19/0640 FULL			27		27	0	27	0	27	0	0	0	0	0	0	0	0	27	0	0	0		Windfall site, within the urban area, principle of development accepted. Full planning application received 13/8/2019; planning committee 18/12/2019 resolved to delegate approval of application subject to access details and S106	
Moss Side Villa, Cartmel Lane, Lytham	1A869		15/0118 FULL			2		2	0	2	2	0							2	0	0	0	0	0		Small site with full planning permission	
Land to rear of 3 Woodville Terrace, Lytham St Annes	1A682		08/0242 FULL 10/0194 FULL			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	
Land to north-west of Edenfield, 2a Clifton Drive, Lytham	1A852		12/0326 15/0292 13/0620			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
Land to east of Edenfield, 2a Clifton Drive	1A985		16/0613 17/0537			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
5 Orchard Road, St Annes	1A920		11/0824			4		4	0	4	4	0							4	0	0	0	0	0		Small site with full planning permission	
Land to side of 8 North Houses Lane, Lytham St Annes	1A994		15/0214 15/0534 16/0123 16/0426 17/0622 19/0771 19/0998			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
23-25 St Andrews Road North, Lytham St Annes	1A996		14/0443			6		6	0	6	6	0							6	0	0	0	0	0		Small site with full planning permission	
23 Clifton Street, Lytham St Annes	1A1004		15/0428			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	
126 Preston Road, Lytham St Annes	1A1007		15/0495			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	
149-151 St Albans Road, St Annes	1A1011		15/0616			2		2	0	2	2	0							2	0	0	0	0	0		Small site with full planning permission	
Office, 24 Wood Street, Lytham St Annes	1A1056		16/0101			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	
Rear of 12 Park Street, Lytham St Annes	1A1058		16/0103			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
Land to rear of 157 St Annes Road East, Shepherd Road, St Annes	1A1059		16/0129			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
259 Inner Promenade, Lytham St Annes	1A1064		16/0445 17/0010			6		6	0	6	0	6							6	0	0	0	0	0		Small site with full planning permission	
314 Clifton Drive North, Lytham St Annes	1A1065		16/0595 17/0810			7		7	0	7	7	0							7	0	0	0	0	0		Small site with full planning permission	
Rear of 45 Warton Street, Lytham	1A1072		17/0028			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
7 North Warton Street, Lytham	1A1073		17/0064			2		2	0	2	0	2							2	0	0	0	0	0		Small site with full planning permission	
1 Tudor Buildings, South Westby Street, Lytham St Annes	1A1107		17/0120			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
Istanbul Restaurant, 26 Hastings Place, Lytham St Annes	1A1109		16/0862			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
Garages, 357 Clifton Drive, St Annes	1A1110		17/0255			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	
Basement, 357 Clifton Drive, St Annes	1A1111		17/0239			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
48 Clifton Street, Lytham St Annes	1A1112		17/0275			2		2	0	2	0	2							2	0	0	0	0	0		Small site with full planning permission	
6 Lowther Terrace, Lytham St Annes	1A1113		17/0467			2		2	0	2	0	2							2	0	0	0	0	0		Small site with full planning permission	
The Guardhouse, Rear of 205 Clifton Drive South, Lytham St Annes	1A1119		17/0829			1		1	0	1	0	1							1	0	0	0	0	0		Small site with full planning permission	
87 Heyhouses Lane, Lytham St Annes	1A1120		17/0857			1		1	0	1	1	0							1	0	0	0	0	0		Small site with full planning permission	

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
1 Wood Street, Lytham St Annes	1A1126	09/0703				2	2	0	2	0	2										2	0	0	0	0	Small site with full planning permission	
Land opposite 15-23 Ribchester Road, Lytham St Annes	1A1127	17/0997				6	6	0	6	0	6										6	0	0	0	0	Small site with full planning permission	
Synagogue, Orchard Road, St Annes	1A1162	17/0762 OL				9	9	0	9	0	9										0	9	0	0	0	Small site with full planning permission	
Railway Platform, St Annes	1A1163	17/1006 FULL				10	10	0	10	0	10										10	0	0	0	0	Full planning permission	
53 St Annes Road West, St Annes	1A1164	18/0134 FULL				3	3	0	3	0	3										3	0	0	0	0	Small site with full planning permission	
10 St Annes Road West, St Annes	1A1165	18/0175 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
46 Clifton Street, Lytham	1A1166	18/0259 FULL				2	2	0	2	0	2										2	0	0	0	0	Small site with full planning permission	
		18/0013 FULL																									
25 Seymour Road, Lytham St Annes	1A1168	19/0278				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
45 Lightburne Avenue, Lytham St Annes	1A1170	18/0494 FULL				-2	-2	0	-2	0	-2										-2	0	0	0	0	Anticipated loss	
14 Windsor Road, Ansdell	1A1173	18/0003 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
30 & 31 South Clifton Street, Lytham	1A1174	18/0710 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
Ravenscourt Rest Home, 286 Clifton Drive South, Lytham St Annes	1A1175	18/0667 FULL				6	6	0	6	6	0										6	0	0	0	0	Small site with full planning permission	
19 Richmond Road, Lytham St Annes	1A1176	18/0765 FULL				-2	-2	0	-2	0	-2										-2	0	0	0	0	Anticipated loss	
93 Clifton Street, Lytham St Annes	1A1177	18/0826 FULL				3	3	0	3	0	3										3	0	0	0	0	Small site with full planning permission	
Rear of 300 Clifton Street, Lytham St Annes	1A1178	18/0841 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
34 Rossall Road, Lytham St Annes	1A1179	18/0949 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
13 Bannister Street, Lytham St Annes	1A1181	19/0106 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
97-99 St Annes Road East, Lytham St Annes		18/0858 FULL				7	7	0	7	0	7										7	0	0	0	0	Small site with full planning permission	
Whispering Trees, Saltcotes Road, Lytham St. Annes		18/0931 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
Northern Orthodontic Services Ltd, Back North Crescent, Lytham St. Annes		19/0174 FULL				5	5	0	5	0	5										5	0	0	0	0	Small site with full planning permission	
16a Church Road, St Annes		19/0202 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
59 and 61 Westby Street, Lytham St Annes		19/0128 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
13 Church Road, Lytham		19/0264 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
24 Pollux Gate, Lytham St Annes		19/0299 FULL				1	1	0	1	1	0										1	0	0	0	0	Small site with full planning permission	
Land and buildings to rear of 157 St Annes Road East, Shepherd Road, Lytham St Annes		19/0328 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
First and second floor of former HSBC, 5 Clifton Square, Lythm St Annes		19/0355 PIP				8	8	0	8	0	8										0	8	0	0	0	Small site with full planning permission	
Flats 1-4 11 Victoria Road, Lytham St Annes		19/0367 FULL				4	4	0	4	0	4										4	0	0	0	0	Small site with full planning permission	
61A St Davids Road North, Lytham St Annes, FY8 2BT		19/0374 FULL				1	1	0	1	1	0										1	0	0	0	0	Small site with full planning permission	
2 & 4 Mythop Avenue, Lytham St Annes		19/0379 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
Land adj 1A Malvern Road, Lytham St. Annes		19/0481 OUT				2	2	0	2	0	2										0	2	0	0	0	Small site with outline planning permission	
11 Moorland Road, Lytham St Annes		19/0516 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
48 & 48a East Beach, Lytham St Annes		19/0654 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
Flats 11 & 15 St Johns Court, Warton Street, Lytham St Annes		19/0698 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
220 Church Road, St. Annes		19/0707 FULL				-1	-1	0	-1	0	-1										-1	0	0	0	0	Anticipated loss	
34A Clifton Street, Lytham St Annes		19/0823 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
Mirasol, 8 Islay Road, Lytham St Annes		19/0942 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
The Sunday School, Bannister Street, Lytham St. Annes		19/0681 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
Chistlehurst, 12 Kintour Road, Lytham St Annes		19/0732 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
16 Shipley Road, Lytham St Annes		19/1018 FULL				-1	-1	0	-1	-1	0										-1	0	0	0	0	Anticipated loss	
Rear of 45 Warton Street, Lytham		20/0014 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
Rear of 17 Market Square/3 Chapel Street, Lytham St Annes		20/0028 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
23 Seville Court, 22 Clifton Drive, Lytham St Annes		20/0032 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
2 Grosvenor Street, Lytham St Annes		20/0040 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission	
Lytham & St Annes Sub Total				0	82	223	1948	2253	644	1609	1056	454	26	36	89	100	66	110	98	22	97	203	125	141	201	39	

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Land to the rear of 23-63 Westgate Road, Squires Gate	HS21	1A677	08/0992 FULL 12/0499 FULL 16/0194 FULL 17/0532 VCON				25	25	25	0	0	0	0	0	0	17	0	8	0	0	0	0	0	0			
Former Clock Garage, Preston New Road, Westby	HS22	4A821	11/0847 OL 15/0891 RM		14			14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0			
Land South of Bridgeside, Squires Gate	HS23	1A873	13/0231 FULL				22	22	22	0	0	0	0	0	0	22	0	0	0	0	0	0	0	0			
Cropper Road West, Whitehills	HSS5		17/0779 OL		350			350	0	350	0	0	0	0	0	0	0	0	0	0	0	0	25	30	Local Plan allocated site. Outline planning application for up to 350 dwellings pending. Although an outline application, it has been made by Emery Planning for the housing developer Wainhomes, and therefore the need to identify a developer following the grant of outline permission is not necessary, and the typical status of a site at this stage of the application process therefore does not apply. The Council is working with the developer to ensure that the application can be approved. The applicant is continuing to work with the Council to resolve outstanding matters. Although not having objected to the inclusion of the site when the Local Plan was published, the Environment Agency subsequently remodelled the flood risk for the area and declared parts of the site to be in flood zones 2 and 3, having previously been in flood zone 1, and has placed a holding objection. This is being challenged: the applicant has engaged consultants who have produced a hydraulic model to demonstrate that the developed parts of the sites will not be in flood risk zones 2 and 3. The issues are technical, relating to the capacity of the existing drainage especially the pumping station at one end of the site, and the applicants for this and the adjoining site are working to resolve the issues. The applicant has been working on a revised masterplan scheme in the meantime (submitted in May 2020). Delivery remains anticipated as shown. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19, with commencement knocked on as the site will follow the developer's Cropper Road East site.		
Cropper Road West (Bambers Lane Site), Whitehills	HSS5		19/0284 FULL		99			99	0	99	0	99	0	0	0	0	0	0	0	0	15	30	30	24	Local Plan allocated site. Full planning application received for 99 dwellings. Although not having objected to the inclusion of the site when the Local Plan was published, the Environment Agency subsequently remodelled the flood risk for the area and declared parts of the site to be in flood zones 2 and 3, having previously been in flood zone 1, and has placed a holding objection. This is being challenged: the applicant has engaged consultants who have produced a hydraulic model to demonstrate that the developed parts of the sites will not be in flood risk zones 2 and 3. The issues are technical, relating to the capacity of the existing drainage especially the pumping station at one end of the site, and the applicants for this and the adjoining site are working to resolve the issues. A revised masterplan scheme has been submitted in the meantime (submitted in May 2020). Delivery remains anticipated as shown.		
40 Peel Hill, Whitehills		4A1159	17/0972 FULL				1	1	0	1	0	1							1	0	0	0	0	0	Small site with full planning permission		
Whitehills Farm Stables, Whitehill Road, Whitehills			18/0436 FULL				1	1	0	1	0	1							1	0	0	0	0	0	Small site with full planning permission		
Fylde-Blackpool Periphery Sub Total				0	499	0	2439	2938	558	2380	224	1756	0	0	27	53	36	79	105	109	149	73	106	105	105	101	

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
SL3 - Warton Strategic Location for Development																											
Blackfield End Farm, Warton	HSS2	2A1020	13/674 OL 17/129 RM				170	170	31	139	139	0	0	0	0	0	0	0	0	0	31	22	30	30	30	27	Local Plan allocated site. Full planning permission for whole site, delivery commenced. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19
Blackfield End Farm, Warton	HSS2		13/0674 OL 18/0568 RM 19/0636 FULL				164	164	0	164	164	0	0	0	0	0	0	0	0	0	0	22	30	30	30	30	Local Plan allocated site. Full planning permission for whole site, construction commenced 2018-19, first completions expected to be recorded in early 2020-21, developer's website shows 11 finished homes released and available June 2020. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19.
Highgate Park, Lytham Road, Warton	HSS7	2A879	12/0550 OL 13/0786 RM 15/706 RM				254	254	184	70	70	0	0	0	0	7	30	27	34	35	51	22	30	18	0	0	Local Plan allocated site. Full planning permission for remaining dwellings. Site delivery shown at standard rate but this is below the rate of delivery achieved last year. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19
Riversleigh Farm, Warton	HS24	2A985	13/0526 FULL				82	82	82	0	0	0	0	0	0	27	34	21	0	0	0	0	0	0	0	0	
Nine Acres Nursery, Harbour Lane Phase 1	HS25	2A765	10/0766 OL 11/0816 RM				75	75	75	0	0	0	0	0	8	41	10	6	1	9	0	0	0	0	0	0	
Georges Garage, Warton	HS26	2A955	14/0833 FULL 15/0187 FULL 16/0986 FULL 13/0562 OL 17/0047 FULL 17/0383 FULL 17/0765 FULL				7	7	7	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	
Oaklands Caravan Park, 252 Lytham Road, Warton	HS27		15/194 OL				53	53	0	53	0	53	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Land North of Freckleton Bypass, Warton	HSS12		14/0410 OL 17/0851 VOC 19/0195 VOC 19/0908 20/0042 RM 20/0057 FULL				350	364	0	364	0	364	0	0	0	0	0	0	0	0	0	0	10	30	30	30	Local Plan allocated site. Outline planning permission for 350 dwellings. Reserved matters application received 24/1/2020 for 350 dwellings for developer Countryside Properties; also full planning application received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties are known to have higher delivery rates, so the figures shown are considered very conservative. The site delivery shown follows modification by the Council from that shown in the consultation version of the Draft APS, to reflect the delivery rates put forward by the site promoter (reduction from 30 to 10 in 2021/22).
Clifton House Farm, Lytham Road, Warton	HSS13		15/0562 OL 17/1050 19/0926 RM				96	96	0	96	0	96	0	0	0	0	0	0	0	0	0	0	15	20	20	20	Local Plan allocated site. Full planning permission (reserved matters approval granted 23/3/2020). Delivery rates adjusted in accordance with pre-consultation engagement from developer, reflecting impact of COVID-19
Brook Mount, 4 Lytham Road, Warton			19/0541 FULL					26	0	26	0	26										0	0	26	0	0	Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019. Addendum: this application was presented to planning committee on 24th June 2020: members agreed a recommendation to delegate approval of the application subject to completion of a S106 agreement to provide £1,000 per dwelling contribution towards off-site public open space.
Great Carr Side Farm, Wrea Brook Lane, Warton	2A885		12/0759 FULL				3	3	0	3	3	0										3	0	0	0	0	Small site with full planning permission
Warton Hall Farm, Lodge Lane, Warton	2A952		14/0669 FULL				-1	-1	0	-1	-1	0										-1	0	0	0	0	Anticipated loss
Barn, Warton Hall Farm, Lodge Lane, Warton	2A951		14/0590 FULL				1	1	0	1	1	0										1	0	0	0	0	Small site with full planning permission
Rose Cottage, Bryning Lane, Warton	2A1131		17/0031 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission
121-123 Lytham Road, Warton			18/0001 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission
206-208 Lytham Road, Bryning with Warton			19/0587 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission
Sykes Hall Farm, 99 Church Road, Warton			19/847 PIP				1	1	0	1	0	1										0	1	0	0	0	Small site with planning permission
Warton Sub Total				0	0	0	1258	1298	379	919	376	543	0	8	41	17	63	62	64	42	82	72	116	154	110	107	

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites	
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14		
SL4 - Kirkham and Wesham Strategic Location for Development																												
The Pastures, Fleetwood Road, Wesham	HSS8	3A890	11/0763 OL 14/0041 RM 14/0779 OL 16/0195 FULL				264	264	211	53	53	0	0	0	0	0	19	53	45	60	34	53	0	0	0	0	Local Plan allocated site. Full planning permission, last units on the site. Developer currently expects that the remaining properties on the development will be completed this year.	
Land North of Blackpool Road, Kirkham	HSS9	3A894	12/419 OL 14/613 RM				117	117	115	2	2	0	0	0	0	0	17	10	31	21	36	2	0	0	0	0	Local Plan allocated site. Final few units to be delivered this year on near-complete site.	
Land North of Blackpool Road, Kirkham	HSS9	3A895	12/0635 OL 15/0308 RM 18/0489 FULL				197	197	162	35	35	0	0	0	0	0	13	45	46	58	58	22	13	0	0	0	Local Plan allocated site. Full planning permission for all remaining units. Site delivering faster than standard assumed rate. Completion of site expected by 2021-22. Delivery has been adjusted to reflect a 3-month delay to all delivery in response to COVID-19	
Land North of Blackpool Road, Kirkham	HSS9		15/0177 FULL				231	231	0	231	0	231	0	0	0	0	0	0	0	0	0	15	30	30	30	30	Local Plan allocated site: final phase of larger site. Full planning permission granted 4/7/2018. Application to discharge conditions received	
Willowfields, Derby Road, Wesham	HSS10	3A355	05/0742 RM				113	113	113	0	0	0	73	21	11	1	1	6	0	0	0	0	0	0	0	0		
Sunnybank Mill, Kirkham	HS28			20			20	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Sunnybank Mill, Kirkham	HS28	3A1134	17/01038 FULL				9	9	9	0	0	0	0	0	0	0	0	0	0	0	9	0	0	0	0	0		
Sunnybank Mill, Kirkham	HS28	3A1133	17/0044 FULL				23	23	23	0	0	0	0	0	0	0	0	0	0	0	23	0	0	0	0	0		
Crossacres land between Weeton Road/ Fleetwood Road, Wesham	HS29	3A360	05/1060 FULL				13	13	13	0	0	0	9	0	0	0	0	4	0	0	0	0	0	0	0	0		
Pennine View, Weeton Road, Wesham	HS30	3A891	13/0364 OL	12			12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Former Fylde Council Offices, Derby Road, Wesham	HS31	3A897	13/0449 FULL				24	24	24	0	0	0	0	0	0	1	7	16	0	0	0	0	0	0	0	0		
West End Residential Park, Kirkham	HS32	3A1085	12/0376 COU				27	27	0	27	27	0	0	0	0	0	0	0	0	0	0	15	12	0	0	0	Local Plan allocated site. Full planning permission for change of use of land to accommodate residential static caravans. Discharge of conditions application received 7/3/2019, granted 29/8/2019.	
Arundel Lodge Nursing Home, 1 Station Road, Wesham	HS33	3A819	12/0700 FULL				11	11	11	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0		
Crossroads, Kirkham	HS34	3A231	08/0891 FULL				12	12	12	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0		
Henthorne Builders, Orders Lane, Kirkham	HS35	3A744	09/0822 FULL				26	26	26	0	0	0	0	26	0	0	0	0	0	0	0	0	0	0	0	0		
St Georges Hotel, Station Road, Kirkham	HS36	3A818	12/0505 FULL				11	11	11	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0		
Land at Brookfarm, Dowbridge, Kirkham	HS57	3A1084	15/0547 OL 18/0791 RM				170	170	1	169	169	0	0	0	0	0	0	0	0	0	0	1	25	25	30	30	30	Local Plan allocated site. Full planning permission for 170 dwellings. Delivery commenced 2019-20. The delivery rate on this site has been amended to take account of the comments of the site promoter, Hollins Strategic Land, through the public consultation stage of the engagement, regarding the expected rate of delivery on this site, from 30 dpa in the first two years to 25. This fulfils the request for adjustment made by the third party Emery Planning for Wainhomes
Campbells Caravans, Blackpool Road, Kirkham	HS63		16/0112 OL				30	30	0	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Site removed from supply following engagement process	
Former Wesham Park Hospital, Derby Road, Wesham			19/0887 OL				51	51	0	51	0	51	0	0	0	0	0	0	0	0	0	0	0	0	15	30	Outline planning application for 51 dwellings on previously-developed site within settlement. Principle of development accepted. Council's Planning Committee resolved to grant outline permission on 18/3/2020 subject to S106 agreement relating to affordable housing, contributions for education and public open space. NHS Property Services announced through local press (4/6/2020) that demolition would commence on 8/6/2020 and take 5 months. Part of wider scheme for redevelopment of the larger site for a new health centre. NHS keen to move scheme forward as the larger scheme depends on funds released from the land sale. Site delivery moved back 12 months in response to engagement (comments from third parties).	

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
Willow Glen, 96 Dowbridge, Kirkham	3A764	08/0733 FULL				1	1	0	1	1	0									1	0	0	0	0	Small site with full planning permission		
68 Poulton Street, Kirkham	3A892	09/0823 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
		14/0105 FULL																									
		15/0866 OL																									
		15/0867 FULL																									
Land adj Nookwood Cottage, Blackpool Road, Kirkham	3A956	16/0631 FULL				3	3	1	2	2	0									2	0	0	0	0	Small site with full planning permission		
Land off Medlar Lane, Medlar	3A1018	16/0766 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
The Manse, Marsden Street, Kirkham	3A1019	15/0507/FULL				-1	-1	0	-1	0	-1									-1	0	0	0	0	Anticipated loss		
The Homestead, Ribby Road, Kirkham	3A1136	15/0812 FULL				1	1	0	1	0	1									0	1	0	0	0	Small site with outline planning permission		
10 West View, Wesham	3A1137	16/0050 OL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
		17/0771 FULL																									
Land rear of the Barn House, Dowbridge, Kirkham	3A1138	17/0645 OL				1	1	0	1	0	1									0	1	0	0	0	Small site with outline planning permission		
3-5 Blackpool Road, Kirkham	3A1139	17/0684 FULL				2	2	1	1	0	1									1	0	0	0	0	Small site with full planning permission		
Land adj 14 Myrtle Drive, Kirkham	3A1189	18/0153 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
58-69 Poulton Street, Kirkham	3A1190	17/1018 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
Land adj Dowbridge Farm, Dowbridge, Kirkham	3A1191	18/0296 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
Land south of Eaton Place, Kirkham	3A1192	18/0279 FULL				3	3	0	3	0	3									3	0	0	0	0	Small site with full planning permission		
		19/215 FULL																									
66 Marsden Street, Kirkham		19/0974 FULL				2	2	0	2	0	2									2	0	0	0	0	Small site with full planning permission		
24 Poulton Street, Kirkham		19/0539 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
53 Ribby Road, Kirkham		19/0941 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
Bradkirk Hall Farm, Weeton Road, Wesham		19/0597 FULL				1	1	0	1	0	1									1	0	0	0	0	Small site with full planning permission		
Kirkham & Wesham Sub Total				0	32	51	1299	1382	733	649	289	328	94	47	22	2	55	102	121	150	138	149	82	60	75	90	

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	
SLS - Non Strategic Locations for Development																											
Freckleton																											
The Refuge, Ruskin Road, Freckleton	HS37	2A1081	13/0262 OL 16/0609 FULL				11	11	11	0	0	0	0	0	0	0	10	1	0	0	0	0	0	0	0	0	
Land rear of High Meadow, Lower Lane, Freckleton	HS38		18/0043 FULL				11	11	0	11	0	11	0	0	0	0	0	0	0	11	0	0	0	0	0	0	Local Plan allocated site. Full planning permission for 11 dwellings approved 13/6/2019 with S106 agreement. Application to discharge conditions received.
Quernmore Trading Estate, Croft Butts Lane, Freckleton	HS66	2A1132	17/0961 FULL				9	9	9	0	0	0	0	0	0	1	8	0	0	0	0	0	0	0	0	0	
Land at Naze Court, Naze Lane, Freckleton - Net of 22 demolitions	HS69		18/0618 FULL				-10	-10	-10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
197 Kirkham Road, Freckleton		2A1023	14/0895 FULL 18/0155 FULL 19/0552 FULL				7	7	0	7	0	7	0	0	0	0	0	0	0	7	0	0	0	0	0	0	Small site with planning permission. New application resolved to approve by Council's Planning Committee 15/1/2020 subject to S106. S106 subsequently signed, decision issued 12/6/2020.
1&2 Ribble View, Preston Old Road, Freckleton		2A743	11/0010 FULL				-1	-1	0	-1	-1	0							-1	0	0	0	0	0	0	0	Anticipated loss
Land between 7-9 Marquis Drive, Freckleton		2A878	10/0596 FULL				1	1	0	1	1	0							1	0	0	0	0	0	0	0	Small site with planning permission
33 Bunker Street, Freckleton		2A1021	14/0761 FULL				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with planning permission
Longacre Cottage, Kirkham Road, Freckleton		2A1076	16/0265 FULL				2	2	0	2	0	2							2	0	0	0	0	0	0	0	Small site with planning permission
58 and Land to the Rear of Preston Old Road Freckleton		2A1082	16/0730 OL 17/0834 RM				9	9	0	9	0	9							9	0	0	0	0	0	0	0	Small site with planning permission
Willow View Cottage, Kirkham Road, Freckleton		2A1083	16/0848 FULL 17/0259 FULL 17/0118 DISC				1	1	0	1	1	0							1	0	0	0	0	0	0	0	Small site with planning permission
Former Piggeries, Poolside, Freckleton		2A1185	17/0968 FULL				3	3	0	3	0	3							3	0	0	0	0	0	0	0	Small site with planning permission
Poolside Farm, Poolside, Freckleton			16/0991 FULL				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with planning permission
Land to rear of 1 Strike Lane, Freckleton			19/0029 FULL				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with planning permission
Elswick																											
Land North of Mill Lane, Elswick	HS72	4A1140	16/0180 OL 18/0318 RM				50	50	0	50	0	50							0	15	30	5	0	0	0	0	Local Plan allocated site. Reserved matters approval granted in October 2018. The site owner's agent has submitted a representation to the Draft APS supporting deliverability of the site and indicating that the delivery should be amended to commence in 2021-22; the Council has amended the projection accordingly.
Land North of Beech Road, Elswick	HS73	4A1141	16/645 FULL 20/0168 VCON				50	50	0	50	0	50							0	15	30	5	0	0	0	0	Local Plan allocated site. Full planning permission granted November 2017. Full application for new developer Kingswood Homes received February 2020 to vary house types. The site owner's agent has indicated in a response to the consultation on the Draft APS that the delivery projections were correct; however, the representation indicates that construction will begin early in 2021. The Council has therefore revised projected completions to begin in 2021-22.
Land North of High Gate and East off Copp Lane, Elswick	HS71	4A1142	16/846 OL				24	24	0	24	0	24							0	0	0	0	0	0	0	0	
Gorst Farm (Barn), Lodge Lane, Elswick		4A1140	15/0018 FULL 16/0576 FULL 19/0123 FULL				2	2	0	2	0	2							2	0	0	0	0	0	0	0	Small site with full planning permission
Gorst Farm (land), Lodge Lane, Elswick			20/0059 VCON				3	3	0	3	0	3							3	0	0	0	0	0	0	0	Small site with full planning permission
Merfield, Copp Lane, Elswick		4A1027	15/0846 FULL				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with full planning permission
Tiny Paws Cattery, Mill Lane, Elswick		4A1087	16/0515 FULL				2	2	1	1	1	0							1	0	0	0	0	0	0	0	Small site with full planning permission
Land adj Hazlenut Cottage, Langtree Lane, Elswick		4A1193	17/1005 OL 19/0260 RM				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with full planning permission
Land opp Farnah and Wynwood, Beech Road, Elswick			18/0461 OL				6	6	0	6	0	6							0	6	0	0	0	0	0	0	Small site with outline planning permission
Staining																											
Land South of Chain Lane, Staining	HS39	4A977	12/0765 FULL 13/0590 OL				42	42	42	0	0	0	0	19	23	0	0	0	0	0	0	0	0	0	0	0	
Land at Kings Close, Staining	HS40	4A798	15/0901 RM				30	30	30	0	0	0	0	0	0	18	11	1	0	0	0	0	0	0	0	0	
Thornfield Caravan Park, Staining	HS41			28			28	0	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Baines Farm, Mill Lane, Staining	HS42	4A752	08/0716 FULL 11/0131 FULL				11	11	11	0	0	0	1	10	0	0	0	0	0	0	0	0	0	0	0	0	
Land Adj to 18 Chain Lane, Staining	HS43	4A774	13/0470 FULL 14/0586 OL				30	30	30	0	0	0	0	1	18	11	0	0	0	0	0	0	0	0	0	0	
Land to rear of 79 Chain Lane/ Occupation Lane, Staining		4A0779	16/0468 OL 19/0360 RM				3	3	0	3	0	3							3	0	0	0	0	0	0	0	Small site with full planning permission
Land adj to Mill Cottage, Mill Lane, Staining		4A1097	16/0385 FULL				1	1	0	1	0	1							1	0	0	0	0	0	0	0	Small site with full planning permission

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Wrea Green																												
Land off Willow Drive, Wrea Green	HSS11	4A1037	15/0458 OL 14/0302 OL 16/0280 RM				86	86	86	0	0	0	0	0	0	16	37	33	0	0	0	0	0					
Land Adj Richmond Avenue, Wrea Green	HS44	4A822	12/0408 OL 13/0097 RM				54	54	54	0	0	0	1	0	0	5	29	18	1	0	0	0	0	0	0	0	0	0
Rear of 54 Bryning Lane, Wrea Green	HS45	4A969	12/0456 OL 16/0156 FULL				36	36	9	27	27	0	0	0	0	0	0	0	5	4	15	12	0	0	0	0	0	
North View Farm, 22 Ribby Road, Wrea Green	HS46	4A970	13/0507 OL				42	42	42	0	0	0	0	0	4	10	12	16	0	0	0	0	0	0	0	0	0	
Land North of North View Farm, Wrea Green	HS47		19/0690 FULL			21	21	0	21	0	0	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0
Former Wareings, Ribby Road, Wrea Green	HS48	4A753	10/0709 FULL				13	13	13	0	0	0	10	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Langtons Farm, Ribby Road, Wrea Green		4A0899	13/0114 FULL				1	1	0	1	1	0									1	0	0	0	0	0	0	0
Land to rear of 60 Bryning Lane, Wrea Green		4A1036	15/0212 FULL 18/0050 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	0
Land to rear of 91 Ribby Road, Wrea Green		4A1093	16/0227 OL 17/0138 FULL				8	8	5	3	3	0									3	0	0	0	0	0	0	0
Newfold Farm, Browns Lane, Wrea Green		4A1149	17/0735 OL 18/0196 RM				1	1	0	1	0	1									1	0	0	0	0	0	0	0
Clifton																												
Land North of Preston Old Road, Clifton	HS49	4A1089	15/0763 OL 16/0488 RM				74	74	51	23	23	0	0	0	0	0	0	0	24	27	22	1	0	0	0	0	0	
Land East of Rowan Close, Ash Lane, Clifton	HS50		15/0165 OL			30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Newton																												
Newton Hall, School Lane, Newton	HS51					86	86	0	86	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Cobweb Barn, Oak Lane, Newton	HS52		17/0595 OL 20/0315 FULL			30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	15	15	0	0	0	
Land West of Woodlands Close, Newton	HS70	4A1146	16/554 OL 17/1046 RM				50	50	6	44	44	0	0	0	0	0	0	0	0	6	19	20	10	0	0	0	0	
Barnfield, New Hey Lane, Newton		4A0903	12/0199 16/0522 FULL 18/0840 OL				1	1	0	1	0	1									0	1	0	0	0	0	0	
Woodlands, Bryning Lane, Newton		4A0967	14/0607 16/0525 FULL				1	1	0	1	1	0									1	0	0	0	0	0	0	
Clifton Grange Farm, Blackpool Road, Newton		4A1090	16/0408 16/0890 FULL				4	4	3	1	1	0									1	0	0	0	0	0	0	
Norcross, Parrox Lane, Newton			19/0218 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	
Pathways, Blackpool Road, Newton			19/0486 OL				4	4	0	4	0	4									0	4	0	0	0	0	0	
Singleton																												
Singleton Village, Singleton	HS53					15	15	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Woodlands, Lodge Lane, Singleton		4A1039	14/0659 OL 16/0932 RM 17/0969 FULL				9	9	5	4	4	0									4	0	0	0	0	0	0	
Riverside, Poolfoot Lane, Singleton		4A1040	15/0042 OL 16/0961 FULL				1	1	0	1	1	0									1	0	0	0	0	0	0	
Silver Ridge, Lodge Lane, Singleton		4A1042	15/0443 OL 17/0683 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	
Worsicks Farm, Weeton Road, Singleton		4A1094	15/0672 FULL 17/0087 NMA				1	1	0	1	0	1									1	0	0	0	0	0	0	
The Croft, 117 Mains Lane, Singleton		4A1151	17/0807 FULL				1	1	0	1	1	0									1	0	0	0	0	0	0	
Land adj 195 Mains Lane, Singleton		4A1152	16/1006 OL 18/0724 RM				9	9	0	9	0	9									9	0	0	0	0	0	0	
29 Mains Lane, Singleton			16/0538 OL 18/0872 FULL 20/0071 FULL				7	7	0	7	0	7									7	0	0	0	0	0	0	
Greenways, 77 Mains Lane, Singleton			18/0144 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	
Land between Hillcrest and Normandy, Mains Lane, Singleton			17/1009 19/0623 FULL				2	2	0	2	0	2									2	0	0	0	0	0	0	

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites	
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Weeton																												
The Laurels and Willow House, Mythop Road, Weeton	HS54	4A913	12/0772 FULL				20	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Land West of Church Road, Weeton	HS64	4A1160	16/0811 OL 18/0839 FULL 19/0802 VCON				39	39	0	39	0	39	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Local Plan allocated site. Full planning permission. Application to vary conditions relating to plans, parking, gates and affordable housing approved 6th Feb 2020, for new developer Concert Living.
Land adj Knowsley Farm, The Green, Weeton		4A1102	16/0493 OL 18/0052 FULL 18/0691 FULL				1	1	0	1	1	0									1	0	0	0	0	0	Small site with full planning permission	
Shorrocks Barn, Back Lane, Weeton		4A1103	17/0039 FULL				2	2	0	2	0	2									2	0	0	0	0	0	Small site with full planning permission	
Ream Hills, Mythop Road, Weeton			18/0186 FULL				1	1	0	1	0	1									1	0	0	0	0	0	Small site with full planning permission	
Mere Court Stud, Mythop Road, Weeton			17/0061 FULL				1	1	0	1	0	1									1	0	0	0	0	0	Small site with full planning permission	
Todderstaffe Hall Farm, Extension of Todderstaff Road, Weeton			18/0552 FULL				1	1	0	1	1	0									1	0	0	0	0	0	Small site with full planning permission	
Greenhalgh																												
The Rowans (Former Blue Anchor Inn), Fleetwood Road, Greenhalgh Phase 1 & 2	HS55	4A820					17	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Catterall Hall Farm, Fleetwood Road, Greenhalgh		4A1030	15/0583 FULL 17/0995 FULL				1	1	0	1	0	1									1	0	0	0	0	0	Small site with full planning permission	
Land at Six Acre Field, Bradshaw Lane, Greenhalgh		4A1144	17/0458 FULL				1	1	0	1	0	1									1	0	0	0	0	0	Small site with full planning permission	
Cornah Row Farm, Fleetwood Old Road, Greenhalgh			19/0098 FULL				4	4	0	4	0	4									4	0	0	0	0	0	Small site with full planning permission	
Smithy Farm, Fleetwood Road, Greenhalgh			19/0049 FULL				1	1	0	1	0	1									1	0	0	0	0	0	Small site with full planning permission	
Little Eccleston																												
Sunnydale Nurseries, Garstang Road, Little Eccleston	HS56	4A1031	15/0124 OL 16/0817 FULL 17/0946 FULL 19/0111 NMA				40	40	35	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Local Plan allocated site. Full planning permission for remaining dwellings, delivery expected 2020-21.	
Merlewood Country Park, Cartford Lane, Little Eccleston			18/0136 VCON				82	82	0	82	0	82									82	0	0	0	0	0	Windfall site. Site has approval on appeal dated 24/10/2019 for full planning permission for use of land for 82 residential caravans on the site, with a unilateral undertaking submitted providing commuted sums for affordable housing	
Land to south of Cartford Inn, Cartford Lane, Little Eccleston		4A0966	13/0386 15/0186 15/0174 16/0208 17/0364 17/0561 17/1063				5	5	4	1	1	0									1	0	0	0	0	0	Small site with full planning permission.	
Larbreck House Farm, Well Lane, Little Eccleston		4A0902	13/0133 FULL				3	3	2	1	1	0									1	0	0	0	0	0	Small site with full planning permission.	
Treales																												
Stanley Grange Farm, Moss Lane East, Treales		4A0979	14/0749 FULL				2	2	1	1	1	0									1	0	0	0	0	0	Small site with full planning permission	
Land east and west of Primrose Farm, Kirkham Road, Treales		4A1043	15/0331 OL 16/0320 RM 16/0812 RM 18/0521 FULL 18/0593 FULL				3	3	0	3	3	0									3	0	0	0	0	0	Small site with full planning permission	
Foundry Yard, Kirkham Road, Treales		4A1044	15/0450 OL 16/0217 RM 17/0634 RM 17/0471 FULL				9	9	2	7	7	0									7	0	0	0	0	0	Small site with full planning permission	
Land adjacent to White Hall, Kirkham Road, Treales		4A1099	16/0087 OL 19/0807 OL				1	1	0	1	0	1									0	1	0	0	0	0	Small site with outline planning permission	
Moss House Farm, Moss Lane East, Treales		4A1154	17/1064 FULL				1	1	0	1	1	0									1	0	0	0	0	0	Small site with full planning permission	
Land off Orchard Dene and North of Kirkham Road, Treales			16/0433 OL				3	3	0	3	0	3									0	3	0	0	0	0	Small site with outline planning permission	
Smithy Cottage, Kirkham Road, Treales			19/0300 OL				4	4	0	4	0	4									0	4	0	0	0	0	Small site with outline planning permission	

Appendix 1 Draft Five-Year Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Notes on deliverability of and delivery on sites	
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14		
Moss Side																												
Woodside Farm, Huck Lane, Moss Side	4A0791	93/0131 FULL				1	1	0	1	1	0										1	0	0	0	0	Small site with full planning permission		
Corka Bridge House, Corka Lane, Moss Side		18/0451 OL				1	1	0	1	0	1										0	1	0	0	0	Small site with outline planning permission		
Westby																												
Land adj Barncroft House, Fox Lane Ends, Westby	4A1198	17/0414 OL 18/0705 RM				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission		
Willows Farm, Ballam Road, Westby	4A1199	18/0436 FULL				2	2	0	2	0	2										2	0	0	0	0	Small site with full planning permission		
Wrea View, Weeton Road, Westby Mills		18/0517 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission		
Salwick																												
Moss Farm (barn), Salwick Road, Salwick, Newton-with-Clifton		19/0321 FULL				1	1	0	1	0	1										1	0	0	0	0	Small site with full planning permission		
Non Strategic Locations Sub Total				0	129	81	960	1170	479	691	130	351	12	14	30	23	63	58	48	118	90	275	128	85	25	0		
Strategic Locations Sub Total				0	613	274	6944	7871	2314	5557	1945	3081	120	91	179	172	220	353	388	323	466	497	429	460	491	337		
Strategic and Non Strategic Locations Sub Total				0	742	355	7904	9041	2793	6248	2075	3432	132	105	209	195	283	411	436	441	556	772	557	545	516	337		
Allowances and Small Sites																												
Small Site Completions									288	288																		
Small Site Completions Adjustment									-8	-8																		
Small Sites and Windfall Allowance (unallocated sites)									360															40	40			
Allowances Sub Total				360	0	0	0	0	280	640	0	0	9	57	25	35	34	44	35	49	78	0	0	0	40	40		
Correction for over-recording of small sites completions																												
Demolition Occurred									-5																			
Demolition Allowances									-14																			
Total Housing Provision (Non Strategic, Strategic and Allowances)				341	742	355	7904	9041	3073	6888	2075	3432	141	162	233	230	315	453	463	490	634	771	556	544	555	376		

Appendix 2

Draft plan period housing trajectory

Appendix 2 Draft Plan Period Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F+G)	Under Construction	Not started (net) (D-F+H)	Years 1 to 9									Years 10 to 14					Years 15 to 19					Years 20 to 21		Plan Period Total	Out of Plan Period Total
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
SL1 - Lytham and St Annes Strategic Location for Development																																			
Queensway, St Annes	HSS1	1A782	08/0058 OL 15/400 RM 13/0257 RM 17/862 FULL				948	948	53	895	869	66	0	0	0	0	0	13	40	27	26	36	27	9	55	55	55	55	55	55	563	385			
Lytham Quays, Lytham	HSS3	1A200 1A354 1A735	02/0641 OL 06/0074 RM 09/0659 OL 11/0374 RM 12/0465 OL 13/0448 RM 20/0183 FULL				120	120	120	0	0	0	5	22	48	40	4	0	1	0	0	0	0	0	0	0	0	0	0	0	120	0			
Heyhouses Lane, St Annes	MUS4	1A783	12/0465 OL 13/0448 RM 20/0183 FULL				158	158	130	28	0	28	0	0	0	10	33	60	27	0	0	15	13	0	0	0	0	0	0	0	158	0			
Heyhouses Lane, St Annes	MUS4	1A783	15/0787 OL 18/0096 OL 19/157 OL 19/815 RM				146	146	0	146	146	0	0	0	0	0	0	0	0	0	15	30	30	30	30	11	0	0	0	0	0	146	0		
Queen Mary School, Clifton Drive South, St Annes	HS1	1A439	03/0157 COU				35	35	35	0	0	0	21	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	35	0			
Jubilee House, East Beach, Lytham	HS2	1A847	13/0001 FULL				20	20	0	20	0	20	0	0	0	0	0	0	0	0	15	5	0	0	0	0	0	0	0	0	20	0			
Ashton Nurseries, Mythop Road, Lytham	HS3	1A858	07/1264 OL 16/0413 FULL 17/0435 FULL				12	12	0	12	0	12	0	0	0	0	0	0	0	0	12	0	0	0	0	0	0	0	0	0	12	0			
The Gables, 35-39 Orchard Road, St Annes	HS4	1A594	05/0648 FULL 16/0639 FULL				19	19	19	0	0	0	0	0	0	0	0	0	7	12	0	0	0	0	0	0	0	0	0	0	19	0			
7-8 St Georges Square, St Annes	HS5	1A760	10/0891 COU				11	11	11	0	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0			
Petros House, St Andrews Road North, St Annes	HS7	1A931	14/0418 COU				35	35	35	0	0	0	0	0	0	0	0	0	0	0	35	0	0	0	0	0	0	0	0	0	35	0			
35-37 South Promenade, St Annes	HS8	1A1003	14/0327 FULL				36	36	36	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36	0			
23 - 33 Fairhaven Road, St Annes	HS9	1A990	14/0320 FULL				32	32	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32	0			
34-36 Orchard Road, Lytham St Annes	HS10	1A998	15/0176 OL	12				12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12	0	0	0	0	0	12	0			
The Galleries, 2-4 Kingsway, Lytham	HS11	1A1010	15/0486 FULL 18/0966 FULL				9	9	0	9	0	9	0	0	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	9	0			
Fairways, Heeley Road, St Annes	HS12		08/0092 OL				20	20	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	5	0	0	0	0	20	0			
Kingsway Garage, St Annes	HS13		11/0667 OL 13/0152 OL 17/0738 FULL				30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	15	0	0	0	0	30	0			
Axa, Lytham	HS14		13/0161 FULL				65	65	0	65	0	65	0	0	0	0	0	0	0	0	15	30	20	0	0	0	0	0	0	0	65	0			
Land to the West, Ballam Road, Lytham	HS15	1A842	14/0161 FULL				12	12	5	7	7	0	0	0	0	0	3	0	2	0	7	0	0	0	0	0	0	0	0	0	12	0			
353 Clifton Drive North, St Annes	HS16	1A658	11/0312 FULL				34	34	34	0	0	0	0	0	0	20	14	0	0	0	0	0	0	0	0	0	0	0	0	0	34	0			
Hastings Point, Ballam Road, Lytham	HS17	1A592	03/0157 FULL				25	25	25	0	0	0	0	0	0	21	4	0	0	0	0	0	0	0	0	0	0	0	0	0	25	0			
Former FBC Depot, St Davids Road North, St Annes	HS18	1A755	12/0537 FULL				32	32	32	0	0	0	0	0	0	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	32	0			
1 Lord Street, St Annes	HS19	1A932	14/0178 FULL				14	14	14	0	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	0			
Former Kwik Save, St Annes	HS20	1A943	14/0790 FULL				15	15	15	0	0	0	0	0	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	0			
Westmoreland House, 29-31 Orchard Road, St Annes	HS58		16/0285 PA 16/0470 FULL					25	0	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0	15	10	0	0	0	0	25	0			
Land to East Sefton Road, Lytham St Annes	HS59		16/0239 FULL				12	12	12	0	0	0	0	0	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	12	0			
Valentines Kennels, Wildings Lane, St Annes	HS60		16/0903 OL 19/0642 FULL					114	0	114	0	114	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	114	0			
Land at Roseacre, Wilding Lane, St Annes	HS61		16/0061 FULL				45	45	0	45	0	0	0	0	0	0	0	0	0	0	0	0	15	30	0	0	0	0	0	0	45	0			
Keenans Mill, Lord Street, Lytham St. Annes	HS62	1A1053	16/0905 FULL				26	26	26	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26	0			
St Leonards Bridge Garage, St. Leonards Road East, Lytham St Annes	HS67		17/0299 OL				32	32	0	32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	17	0	0	0	0	32	0			
Church Road Methodist Church, Church Road, S. Annes	HS68		17/0665 FULL				10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	10	0			
Hole in One, Forest Drive, Lytham St Annes			19/0640 FULL				27	27	0	27	0	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27	0			

Appendix 2 Draft Plan Period Housing Trajectory

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
SL2 - Fylde - Blackpool Periphery Strategic Location for Development																																			
Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	1A833	08/1049 OL 10/0877 OL 14/0392 RM				76	76	76	0	0	0	0	13	32	29	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	76	0		
Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	1A834	08/1049 OL 16/0062 FULL				353	353	167	186	186	0	0	0	0	5	53	109	34	45	45	45	17	0	0	0	0	0	0	0	0	353	0		
Land at Lytham St Annes Way, Whitehills	HSS6	4A703	11/0639 FULL				67	67	67	0	0	0	0	27	30	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	67	0		
Land at Lytham St Annes Way, Whitehills	HSS6	4A770	13/0213 FULL				36	36	36	0	0	0	0	23	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	36	0		
Land at Lytham St Annes Way, Whitehills	HSS6	4A771	13/0726 FULL				26	26	26	0	0	0	0	0	24	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	26	0		
Land at Lytham St Annes Way, Whitehills	HSS6			22			22	0	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	7	0	0	0	22	0			
Cropper Road East, Whitehills	MUS1	4A911	12/0717 OL 14/0310 RM 17/0510 FULL				146	146	139	7	7	0	0	0	23	52	34	30	7	0	0	0	0	0	0	0	0	0	0	0	0	146	0		
Cropper Road East, Whitehills	MUS1	4A1100	13/0753 OL 19/0140 FULL				31	31	0	31	31	0	0	0	0	0	0	0	15	16	0	0	0	0	0	0	0	0	0	0	31	0			
Cropper Road East, Whitehills	MUS1		15/0114 OL				265	265	0	265	0	265	0	0	0	0	0	0	0	0	0	0	0	0	15	30	30	30	30	30	195	0			
Cropper Road East, Whitehills	MUS1	4A1050	15/0472 OL 16/0847 RM 18/0694 NMA				80	80	0	80	0	80	0	0	0	0	0	0	15	30	30	5	0	0	0	0	0	0	0	0	80	0			
Spengarth, Cropper Road, Westby	MUS1		15/0807 OL				14	14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	0	0	0	0	0	14	0			
Whyndyke Farm, Preston New Road, Whitehills	MUS2		11/0221 OL 20/0334 VCON				1310	1310	0	1310	0	1310	0	0	0	0	0	0	0	0	0	0	0	30	60	60	60	60	60	60	450	860			

Appendix 2 Draft Plan Period Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F=G)	Under Construction	Not started (net) (D-F=H)	Years 1 to 9									Years 10 to 14					Years 15 to 19					Years 20 to 21		Plan Period Total	Out of Plan Period Total	
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032			
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21			
Land to the rear of 23-63 Westgate Road, Squires Gate	HS21	1A677	08/0992 FULL 12/0499 FULL 16/0194 FULL 17/0532 VCON				25	25	25	0	0	0	0	0	17	0	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	25	0
Former Clock Garage, Preston New Road, Westby	HS22	4A821	11/0847 OL 15/0891 RM		14			14	0	14	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	14	0	
Land South of Bridgeside, Squires Gate	HS23	1A873	13/0231 FULL				22	22	22	0	0	0	0	0	22	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	22	0	
Cropper Road West, Whitehills	HSS5		17/0779 OL		350			350	0	350	0	0	0	0	0	0	0	0	0	25	30	30	30	30	30	30	30	30	30	30	30	30	30	265	85	
Cropper Road West (Bambers Lane Site), Whitehills	HSS5		19/0284 FULL		99			99	0	99	0	0	0	0	0	0	0	0	0	15	30	30	24	0	0	0	0	0	0	0	0	0	0	99	0	
40 Peel Hill, Whitehills		4A1159	17/0972 FULL				1	1	0	1	0	1	0	1						1	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Whitehills Farm Stables, Whitehill Road, Whitehills			18/0436 FULL				1	1	0	1	0	1	0	1						1	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Fylde-Blackpool Periphery Sub Total					0	499	0	2439	2938	558	2380	224	1756	0	0	27	53	36	79	105	109	149	73	106	105	105	101	133	120	135	127	120	120	120	1923	945

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
SL3 - Warton Strategic Location for Development																																			
Blackfield End Farm, Warton	HSS2	2A1020	13/674 OL 17/129 RM				170	170	31	139	139	0	0	0	0	0	0	0	0	0	31	22	30	30	30	27	0	0	0	0	0	0	170	0	
Blackfield End Farm, Warton	HSS2		13/0674 OL 18/0568 RM 19/0636 FULL				164	164	0	164	164	0	0	0	0	0	0	0	0	0	0	22	30	30	30	30	22	0	0	0	0	0	164	0	
Highgate Park, Lytham Road, Warton	HSS7	2A879	12/0550 OL 13/0786 RM 15/706 RM				254	254	184	70	70	0	0	0	0	7	30	27	34	35	51	22	30	18	0	0	0	0	0	0	0	254	0		
Riversleigh Farm, Warton	HS24	2A985	13/0526 FULL				82	82	82	0	0	0	0	27	34	21	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	82	0		
Nine Acres Nursery, Harbour Lane Phase 1	HS25	2A765	10/0766 OL 11/0816 RM				75	75	75	0	0	0	0	0	8	41	10	6	1	9	0	0	0	0	0	0	0	0	0	0	0	75	0		
Georges Garage, Warton	HS26	2A955	14/0833 FULL 15/0187 FULL 16/0986 FULL 13/0562 OL 17/0047 FULL 17/0383 FULL 17/0765 FULL				7	7	7	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	7	0		
Oaklands Caravan Park, 252 Lytham Road, Warton	HS27		15/194 OL				53	53	0	53	0	53	0	0	0	0	0	0	0	0	0	0	0	0	0	15	30	8	0	0	0	53	0		
Land North of Freckleton Bypass, Warton	HSS12		14/0410 OL 17/0851 VOC 19/0195 VOC 19/0908 20/0042 RM 20/0057 FULL				350	364	0	364	0	364	0	0	0	0	0	0	0	0	0	10	30	30	30	30	60	60	60	60	24	0	0	364	0
Clifton House Farm, Lytham Road, Warton	HSS13		15/0562 OL 17/1050 19/0926 RM				96	96	0	96	0	96	0	0	0	0	0	0	0	0	0	15	20	20	20	21	0	0	0	0	0	0	96	0	
Brook Mount, 4 Lytham Road, Warton			19/0541 FULL				26	0	26	0	26	0	26	0	0	0	0	0	0	0	0	0	26	0	0	0	0	0	0	0	0	26	0		
Great Carr Side Farm, Wrea Brook Lane, Warton	2A885		12/0759 FULL				3	3	0	3	3	0	3	0	0	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	3	0		
Warton Hall Farm, Lodge Lane, Warton	2A952		14/0669 FULL				-1	-1	0	-1	-1	0	-1	0	0	0	0	0	0	0	0	-1	0	0	0	0	0	0	0	0	-1	0			
Barn, Warton Hall Farm, Lodge Lane, Warton	2A951		14/0590 FULL				1	1	0	1	1	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0			
Rose Cottage, Bryning Lane, Warton	2A1131		17/0031 FULL				1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0			
121-123 Lytham Road, Warton			18/0001 FULL				1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0			
206-208 Lytham Road, Bryning with Warton			19/0587 FULL				1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	1	0			
Sykes Hall Farm, 99 Church Road, Warton			19/0847 PIP				1	1	0	1	0	1	0	1	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	1	0			
Warton Sub Total				0	0	0	1258	1298	379	919	376	543	0	8	41	17	63	62	64	42	82	72	116	154	110	107	118	90	68	60	24	0	0	1298	0

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
SL4 - Kirkham and Wesham Strategic Location for Development																																			
The Pastures, Fleetwood Road, Wesham	HSS8	3A890	11/0763 OL 14/0041 RM 14/0779 OL 16/0195 FULL				264	264	211	53	53	0	0	0	0	0	0	19	53	45	60	34	53	0	0	0	0	0	0	0	0	0	264	0	
Land North of Blackpool Road, Kirkham	HSS9	3A894	12/419 OL 14/613 RM				117	117	115	2	2	0	0	0	0	0	0	17	10	31	21	36	2	0	0	0	0	0	0	0	0	0	117	0	
Land North of Blackpool Road, Kirkham	HSS9	3A895	12/0635 OL 15/0308 RM 18/0489 FULL				197	197	162	35	35	0	0	0	0	0	0	13	45	46	58	22	13	0	0	0	0	0	0	0	0	0	197	0	
Land North of Blackpool Road, Kirkham	HSS9		15/0177 FULL				231	231	0	231	0	231	0	0	0	0	0	0	0	0	0	0	15	30	30	30	30	30	30	30	30	30	231	0	
Willowfields, Derby Road, Wesham	HSS10	3A355	05/0742 RM				113	113	113	0	0	0	0	0	0	0	0	73	21	11	1	1	6	0	0	0	0	0	0	0	0	0	113	0	
Sunnybank Mill, Kirkham	HS28			20			20	0	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	0		
Sunnybank Mill, Kirkham	HS28	3A1134	17/01038 FULL				9	9	9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0		
Sunnybank Mill, Kirkham	HS28	3A1133	17/0044 FULL				23	23	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	23	0		
Crossacres land between Weeton Road/Fleetwood Road, Wesham	HS29	3A360	05/1060 FULL				13	13	13	0	0	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	13	0		
Pennine View, Weeton Road, Wesham	HS30	3A891	13/0364 OL	12			12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12	0		
Former Fylde Council Offices, Derby Road, Wesham	HS31	3A897	13/0449 FULL				24	24	24	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	24	0		
West End Residential Park, Kirkham	HS32	3A1085	12/0376 COU				27	27	0	27	27	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	27	0		
Arundel Lodge Nursing Home, 1 Station Road, Wesham	HS33	3A819	12/0700 FULL				11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0		
Crossroads, Kirkham	HS34	3A231	08/0891 FULL				12	12	12	0	0	0	0	0	0	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0	12	0		
Henthorne Builders, Orders Lane, Kirkham	HS35	3A744	09/0822 FULL				26	26	26	0	0	0	0	0	0	0	0	0	26	0	0	0	0	0	0	0	0	0	0	0	0	26	0		
St Georges Hotel, Station Road, Kirkham	HS36	3A818	12/0505 FULL				11	11	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0		
Land at Brookfarm, Dowbridge, Kirkham	HS57	3A1084	15/0547 OL 18/0791 RM				170	170	1	169	169	0	0	0	0	0	0	0	0	0	0	0	25	25	30	30	30	29	0	0	0	0	170	0	
Campbells Caravans, Blackpool Road, Kirkham	HS63		16/0112 OL				30	30	0	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	0		
Former Wesham Park Hospital, Derby Road, Wesham			19/0887 OL	51			51	0	51	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	30	6	0	0	0	0	51	0		
Willow Glen, 96 Dowbridge, Kirkham		3A764	08/0733 FULL 09/0823 FULL				1	1	0	1	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
68 Poulton Street, Kirkham		3A892	13/0464 FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Land adj Nookwood Cottage, Blackpool Road, Kirkham		3A956	14/0105 FULL 15/0866 OL 15/0867 FULL 16/0631 FULL				3	3	1	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0		
Land off Medlar Lane, Medlar		3A1018	16/0766 FULL 15/0507/FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
The Manse, Marsden Street, Kirkham		3A1019	15/0812 FULL				-1	-1	0	-1	0	-1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-1	0			
The Homestead, Ribby Road, Kirkham		3A1136	16/0050 OL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0			
10 West View, Wesham		3A1137	17/0771 FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0			
Land rear of the Barn House, Dowbridge, Kirkham		3A1138	17/0645 OL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
3-5 Blackpool Road, Kirkham		3A1139	17/0684 FULL				2	2	1	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Land adj 14 Myrtle Drive, Kirkham		3A1189	18/0153 FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
58-69 Poulton Street, Kirkham		3A1190	17/1018 FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Land adj Dowbridge Farm, Dowbridge, Kirkham		3A1191	18/0296 FULL				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Land south of Eaton Place, Kirkham		3A1192	18/0279 FULL				3	3	0	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	0		
66 Marsden Street, Kirkham			19/215 19/974				2	2	0	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0		
24 Poulton Street, Kirkham			19/539				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
53 Ribby Road, Kirkham			19/941				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Bradkirk Hall Farm, Weeton Road, Wesham			19/597				1	1	0	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Kirkham & Wesham Sub Total				0	32	51	1299	1382	733	649	289	328	94	47	22	2	55	102	121	150	138	149	82	60	75	90	107	50	30	6	0	0	0	1380	0

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													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032			
SL5 - Non Strategic Locations for Development																																				
Freckleton																																				
The Refuge, Ruskin Road, Freckleton	HS37	2A1081	13/0262 OL 16/0609 FULL				11	11	11	0	0	0	0	0	0	0	10	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0
Land rear of High Meadow, Lower Lane, Freckleton	HS38		18/0043 FULL				11	11	0	11	0	11	0	0	0	0	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0
Quernmore Trading Estate, Croft Butts Lane, Freckleton	HS66	2A1132	17/0961 FULL				9	9	9	0	0	0	0	0	1	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0	
Land at Naze Court, Naze Lane, Freckleton - Net of 22 demolitions	HS69		18/0618 FULL 14/0895 FULL 19/0552 FULL				-10	-10	-10	0	0	0	0	0	0	0	0	-10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	-10	0	
197 Kirkham Road, Freckleton		2A1023	14/0895 FULL 19/0552 FULL				7	7	0	7	0	7	0	0	0	0	0	0	7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	7	0	
1&2 Ribble View, Preston Old Road, Freckleton		2A743	11/0010				-1	-1	0	-1	-1	0	0	0	0	0	0	0	-1	0	0	0	0	0	0	0	0	0	0	0	0	0	-1	0		
Land between 7-9 Marquis Drive, Freckleton		2A878	10/0596				1	1	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
33 Bunker Street, Freckleton		2A1021	14/0761 FULL				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Longacre Cottage, Kirkham Road, Freckleton		2A1076	16/0265 FULL				2	2	0	2	0	2	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0		
58 and Land to the Rear of Preston Old Road Freckleton		2A1082	16/0730 OL 17/0834 RM				9	9	0	9	0	9	0	0	0	0	0	0	9	0	0	0	0	0	0	0	0	0	0	0	0	0	9	0		
Willow View Cottage, Kirkham Road, Freckleton		2A1083	16/0848 FULL 17/0259 FULL 17/0118				1	1	0	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0		
Former Piggeries, Poolside, Freckleton		2A1185	17/0968 FULL				3	3	0	3	0	3	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3	0			
Poolside Farm, Poolside, Freckleton			16/0991 FULL				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0			
Land to rear of 1 Strike Lane, Freckleton			19/0029				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1	0			
Elswick																																				
Land North of Mill Lane, Elswick	HS72	4A1140	16/0180 OL 18/0318 RM 16/645 FULL				50	50	0	50	0	50	0	0	0	0	0	0	0	15	30	5	0	0	0	0	0	0	0	0	0	0	50	0		
Land North of Beech Road, Elswick	HS73	4A1141	20/0168 VCON				50	50	0	50	0	50	0	0	0	0	0	0	0	15	30	5	0	0	0	0	0	0	0	0	0	0	50	0		
Land North of High Gate and East off Copp Lane, Elswick	HS71	4A1142	16/846 OL 15/0018				24	24	0	24	0	24	0	0	0	0	0	0	0	0	0	0	0	15	9	0	0	0	0	0	0	24	0			
Gorst Farm (Barn), Lodge Lane, Elswick		4A1140	16/0576 FULL 19/0123 FULL				2	2	0	2	0	2	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	2	0			
Gorst Farm (land), Lodge Lane, Elswick			20/0059 VCON				3	3	0	3	0	3	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	0	3	0				
Merfield, Copp Lane, Elswick		4A1027	15/0846 Full				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0				
Tiny Paws Cattery, Mill Lane, Elswick		4A1087	16/0515 FULL				2	2	1	1	1	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0				
Land adj Hazlenut Cottage, Langtree Lane, Elswick		4A1193	17/1005 OL 19/0260 RM				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0				
Land opp Farnah and Wynwood, Beech Road, Elswick			18/0461 OL 20/0169 FULL				6	6	0	6	0	6	0	0	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0	0	6	0				
Staining																																				
Land South of Chain Lane, Staining	HS39	4A977	12/0765 FULL 13/0590 OL				42	42	42	0	0	0	0	19	23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	42	0			
Land at Kings Close, Staining	HS40	4A798	15/0901 RM				30	30	30	0	0	0	0	0	0	18	11	1	0	0	0	0	0	0	0	0	0	0	0	0	0	30	0			
Thornfield Caravan Park, Staining	HS41			28			28	0	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	13	0	0	0	0	0	28	0				
Baines Farm, Mill Lane, Staining	HS42	4A752	08/0716 FULL 11/0131 FULL 13/0470 FULL				11	11	11	0	0	0	0	1	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	11	0				
Land Adj to 18 Chain Lane, Staining	HS43	4A774	14/0586 OL 16/0468 OL 19/0360 RM				30	30	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	0				
Land to rear of 79 Chain Lane/ Occupation Lane, Staining		4A0779					3	3	0	3	0	3	0	0	0	0	0	0	3	0	0	0	0	0	0	0	0	0	0	3	0					
Land adj to Mill Cottage, Mill Lane, Staining		4A1097	16/0385 FULL				1	1	0	1	0	1	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	1	0					

Appendix 2 Draft Plan Period Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F+G)	Under Construction	Not started (net) (D-F+H)	Years 1 to 9									Years 10 to 14					Years 15 to 19					Years 20 to 21		Plan Period Total	Out of Plan Period Total
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
Wrea Green																																			
			15/0458 OL																																
Land off Willow Drive, Wrea Green	HSS11	4A1037	14/0302 OL				86	86	86	0	0	0	0	0	16	37	33	0	0	0	0	0	0	0	0	0	0	0	0	0	0	86	0		
Land Adj Richmond Avenue, Wrea Green	HS44	4A822	12/0408 OL 13/0097 RM				54	54	54	0	0	0	1	0	0	5	29	18	1	0	0	0	0	0	0	0	0	0	0	0	0	54	0		
Rear of 54 Bryning Lane, Wrea Green	HS45	4A969	12/0456 OL 16/0156 FULL				36	36	9	27	27	0	0	0	0	0	0	5	4	15	12	0	0	0	0	0	0	0	0	0	0	36	0		
North View Farm, 22 Ribby Road, Wrea Green	HS46	4A970	13/0507 OL				42	42	42	0	0	0	0	0	4	10	12	16	0	0	0	0	0	0	0	0	0	0	0	0	0	42	0		
Land North of North View Farm, Wrea Green	HS47		19/0690 FULL			21		21	0	21	0	0	0	0	0	0	0	0	0	0	21	0	0	0	0	0	0	0	0	0	0	21	0		
Former Wareings, Ribby Road, Wrea Green	HS48	4A753	10/0709 FULL				13	13	13	0	0	0	10	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	13	0		
Langtons Farm, Ribby Road, Wrea Green		4A0899	13/0114 FULL				1	1	0	1	1	0								1	0	0	0	0	0	0	0	0	0	0	1	0			
Land to rear of 60 Bryning Lane, Wrea Green		4A1036	15/0212 FULL 18/0050 FULL				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
Land to rear of 91 Ribby Road, Wrea Green		4A1093	16/0227 OL 17/0138 FULL				8	8	5	3	3	0								3	0	0	0	0	0	0	0	0	0	0	3	0			
Newfold Farm, Browns Lane, Wrea Green		4A1149	17/0735 OL 18/0196 RM				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
Clifton																																			
Land North of Preston Old Road, Clifton	HS49	4A1089	15/0763 OL 16/0488 RM				74	74	51	23	23	0	0	0	0	0	0	0	0	24	27	22	1	0	0	0	0	0	0	0	0	74	0		
Land East of Rowan Close, Ash Lane, Clifton		HS50	15/0165 OL				30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	30	0		
Newton																																			
Newton Hall, School Lane, Newton		HS51				86		86	0	86	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	86	0		
Cobweb Barn, Oak Lane, Newton		HS52	17/0595 OL 20/0315 FULL				30	30	0	30	0	0	0	0	0	0	0	0	0	0	0	15	15	0	0	0	0	0	0	0	0	30	0		
Land West of Woodlands Close, Newton	HS70	4A1146	16/554 OL 17/1046 RM				50	50	6	44	44	0	0	0	0	0	0	0	6	19	20	10	0	0	0	0	0	0	0	0	0	55	0		
Barnfield, New Hey Lane, Newton		4A0903	12/0199 16/0522 FULL 18/0840 OL				1	1	0	1	0	1								0	1	0	0	0	0	0	0	0	0	0	1	0			
Woodlands, Bryning Lane, Newton		4A0967	14/0607 16/0525 FULL				1	1	0	1	1	0								1	0	0	0	0	0	0	0	0	0	0	1	0			
Clifton Grange Farm, Blackpool Road, Newton		4A1090	16/0408 16/0890 FULL				4	4	3	1	1	0								1	0	0	0	0	0	0	0	0	0	0	1	0			
Norcross, Parrox Lane, Newton			19/0218 FULL				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
Pathways, Blackpool Road, Newton			19/0486 OL				4	4	0	4	0	4								0	4	0	0	0	0	0	0	0	0	0	4	0			
Singleton																																			
Singleton Village, Singleton		HS53				15		15	0	15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	15	0		
Woodlands, Lodge Lane, Singleton		4A1039	14/0659 OL 16/0932 RM 17/0969 FULL				9	9	5	4	4	0								4	0	0	0	0	0	0	0	0	0	0	4	0			
Riverside, Poolfoot Lane, Singleton		4A1040	15/0042 OL 16/0961 FULL				1	1	0	1	1	0								1	0	0	0	0	0	0	0	0	0	0	1	0			
Silver Ridge, Lodge Lane, Singleton		4A1042	15/0443 OL 17/0683 FULL				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
Worsicks Farm, Weeton Road, Singleton		4A1094	15/0672 FULL 17/0087 NMA				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
The Croft, 117 Mains Lane, Singleton		4A1151	17/0807 FULL				1	1	0	1	1	0								1	0	0	0	0	0	0	0	0	0	0	1	0			
Land adj 195 Mains Lane, Singleton		4A1152	16/1006 OL 18/0724 RM				9	9	0	9	0	9								9	0	0	0	0	0	0	0	0	0	0	9	0			
29 Mains Lane, Singleton			16/0538 OL 18/0872 FULL 20/0071 FULL				7	7	0	7	0	7								7	0	0	0	0	0	0	0	0	0	0	7	0			
Greenways, 77 Mains Lane, Singleton			18/0144 FULL				1	1	0	1	0	1								1	0	0	0	0	0	0	0	0	0	0	1	0			
Land between Hillcrest and Normandy, Mains Lane, Singleton			17/1009 19/0623 FULL				2	2	0	2	0	2								2	0	0	0	0	0	0	0	0	0	0	2	0			

Appendix 2 Draft Plan Period Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F+G)	Under Construction	Not started (net) (D-F+H)	Years 1 to 9									Years 10 to 14					Years 15 to 19					Years 20 to 21		Plan Period Total	Out of Plan Period Total
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032		
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21		
Weeton																																			
The Laurels and Willow House, Mythop Road, Weeton	HS54	4A913	12/0772 FULL 16/0811 OL 18/0839 FULL				20	20	20	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	20	0		
Land West of Church Road, Weeton	HS64	4A1160	19/0802 VCON 16/0493 OL 18/0052 FULL 18/0691 FULL				39	39	0	39	0	39																			39	0			
Land adj Knowsley Farm, The Green, Weeton		4A1102	17/0039 FULL				1	1	0	1	1	0																			1	0			
Shorrocks Barn, Back Lane, Weeton		4A1103	18/0186 FULL				2	2	0	2	0	2																			2	0			
Ream Hills, Mythop Road, Weeton			17/0061 FULL				1	1	0	1	0	1																			1	0			
Mere Court Stud, Mythop Road, Weeton			18/0552 FULL				1	1	0	1	0	1																			1	0			
Todderstaff Hall Farm, Extension of Todderstaff Road, Weeton							1	1	0	1	1	0																			1	0			
Greenhalgh																																			
The Rowans (Former Blue Anchor Inn), Fleetwood Road, Greenhalgh Phase 1 & 2	HS55	4A820					17	17	17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	17	0			
Catterall Hall Farm, Fleetwood Road, Greenhalgh		4A1030	15/0583 FULL 17/0995 FULL				1	1	0	1	0	1																			1	0			
Land at Six Acre Field, Bradshaw Lane, Greenhalgh		4A1144	17/0458 FULL				1	1	0	1	0	1																			1	0			
Cornah Row Farm, Fleetwood Old Road, Greenhalgh			19/0098 FULL				4	4	0	4	0	4																			4	0			
Smithy Farm, Fleetwood Road, Greenhalgh			19/0049 FULL				1	1	0	1	0	1																			1	0			
Little Eccleston																																			
Sunnydale Nurseries, Garstang Road, Little Eccleston	HS56	4A1031	15/0124 OL 16/0817 FULL 17/0946 FULL 19/0111 NMA				40	40	35	5	5	0	0	0	0	0	7	28	5	0	0	0	0	0	0	0	0	0	0	0	0	40	0		
Merlewood Country Park, Cartford Lane, Little Eccleston			18/0136 VCON				82	82	0	82	0	82																			82	0			
Land to south of Cartford Inn, Cartford Lane, Little Eccleston		4A0966	13/0386 15/0186 15/0174 16/0208 17/0364 17/0561 17/1063				5	5	4	1	1	0																			1	0			
Larbreck House Farm, Well Lane, Little Eccleston		4A0902	13/0133 FULL				3	3	2	1	1	0																			1	0			
Treales																																			
Stanley Grange Farm, Moss Lane East, Treales		4A0979	14/0749 FULL				2	2	1	1	1	0																			1	0			
Land east and west of Primrose Farm, Kirkham Road, Treales		4A1043	15/0331 OL 16/0320 RM 16/0812 RM 18/0521 FULL 18/0593 FULL				3	3	0	3	3	0																			3	0			
Foundry Yard, Kirkham Road, Treales		4A1044	15/0450 OL 16/0217 RM 17/0634 RM				9	9	2	7	7	0																			7	0			
Land adjacent to White Hall, Kirkham Road, Treales		4A1099	17/0471 FULL 16/0087 OL				1	1	0	1	0	1																			1	0			
Moss House Farm, Moss Lane East, Treales		4A1154	17/1064 FULL				1	1	0	1	1	0																			1	0			
Land off Orchard Dene and North of Kirkham Road, Treales			16/0433 OL				3	3	0	3	0	3																			3	0			
Smithy Cottage, Kirkham Road, Treales			19/0300 OL				4	4	0	4	0	4																			4	0			

Appendix 2 Draft Plan Period Housing Trajectory

Site	Site Reference	HLAS Site Reference	Planning Application Number	Allowances	Allocations	Minded to Approve (net)	Planning Application Commitment (net)	Total Dwellings (B+C+D = E)	Completions (Sum of Years 1 to 9)	Balance (E-F+G)	Under Construction	Not started (net) (D-F+H)	Years 1 to 9									Years 10 to 14					Years 15 to 19					Years 20 to 21		Plan Period Total	Out of Plan Period Total	
													2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032			
													1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21			
Moss Side																																				
Woodside Farm, Huck Lane, Moss Side	4A0791	93/0131 FULL				1	1	0	1	1	0									1	0	0	0	0	0	0	0	0	0	0	0	1	0			
Corka Bridge House, Corka Lane, Moss Side		18/0451 OL				1	1	0	1	0	1									0	1	0	0	0	0	0	0	0	0	0	0	0	1	0		
Westby																																				
Land adj Barncroft House, Fox Lane Ends, Westby	4A1198	17/0414 OL 18/0705 RM				1	1	0	1	0	1									1	0	0	0	0	0	0	0	0	0	0	0	1	0			
Willows Farm, Ballam Road, Westby	4A1199	18/0436 FULL				2	2	0	2	0	2									2	0	0	0	0	0	0	0	0	0	0	0	2	0			
Wrea View, Weeton Road, Westby Mills		18/0517 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	0	0	0	0	0	1	0			
Salwick																																				
Moss Farm (barn), Salwick Road, Salwick, Newton-with-Clifton		19/0321 FULL				1	1	0	1	0	1									1	0	0	0	0	0	0	0	0	0	0	0	0	0	0		
Non Strategic Locations Sub Total				0	129	81	960	1170	479	691	130	351	12	14	30	23	63	58	48	118	90	275	128	85	25	0	60	37	15	30	30	11	0	1151	0	
Strategic Locations Sub Total				0	613	274	6944	7871	2314	5557	1945	3081	120	91	179	172	220	353	388	323	466	497	429	460	491	337	496	362	288	248	199	175	175	6469	1330	
Strategic and Non Strategic Locations Sub Total				0	742	355	7904	9041	2793	6248	2075	3432	132	105	209	195	283	411	436	441	556	772	557	545	516	337	556	399	303	278	229	186	175	7620	1330	
Allowances and Small Sites																																				
Small Site Completions								288	288			9	57	25	35	34	44	35	49	78														366		
Small Site Completions Adjustment								-8	-8																									-8	0	
Small Sites and Windfall Allowance (unallocated sites)				360						360			0	0	0	0	0	0	0	0	0	0	0	40	40	40	40	40	40	40	40	40	40	360	0	
Allowances Sub Total				360	0	0	0	0	280	640	0	0	9	57	25	35	34	44	35	49	78	0	0	0	40	40	40	40	40	40	40	40	40	718	0	
Correction for over-recording of small sites completions																																				
Demolition Occurred				-5								0	0	-1	0	-2	-2	0																-5		
Demolition Allowances				-14																															-12	
Total Housing Provision (Non Strategic, Strategic and Allowances)				341	742	355	7904	9041	3073	6888	2075	3432	141	162	233	230	315	453	463	490	634	771	556	544	555	376	595	438	342	317	268	225	214	8321		

Appendix 3
Engagement Statement

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1. Introduction

1.1 This statement has been produced to support the conclusions of Fylde Council's Five-Year Housing Land Supply Submission Draft Annual Position Statement. The Draft Annual Position Statement has been produced through a process of engagement with developers and others who have an impact on delivery, in accordance with the Framework. This statement contains the following:

- Section 2 provides an explanation of the processes of engagement with site owners/applicants, developers and other stakeholders,
- Section 3 provides the text of the actual responses received from stakeholders and a table showing the information provided and the sites affected, including commentary on whether the Council has needed to adjust its' expectations for delivery, and in what way;
- Section 4 identifies sites for which likely delivery has been disputed, and where the Council has not followed the opinion of the stakeholder concerned. For each site affected, the views of the stakeholders disputing the expected delivery are set out, and the Council's view and conclusions are explained. A calculation is included to show the Council's overall conclusion and the illustrative effects of the sites in dispute.
- The Annexes provide details of consultation material and copies of the original responses received.

2. The Engagement Process

SHLAA Steering Group

- 2.1 The starting point for the assumptions on lead-in times and delivery rates used in the Local Plan and which have been retained as the starting point for the Annual Position Statement were developed through the SHLAA Steering Group, which included representatives of the development industry. The standard assumptions, which are included in the table in Section 4 of the main Annual Position Statement document, have therefore been derived from a process of engagement; however this has since been modified with the rider “where there is clear evidence that homes will be delivered within 5 years” in order that it remains in accordance with the revised definition of a deliverable site in the Framework (2018 and 2019).

Local Plan

- 2.2 The Local Plan Examination considered the Council’s approach including the use of assumptions, in the face of challenges to the delivery rates and lead-in times on particular sites from the developers of those sites and their agents. Paragraph 75 of the Inspector’s Report states:

The housing trajectory, in appendix 2 of the Plan includes detailed tables on how each allocated site is proposed to be delivered during the Plan period. Following discussions on the deliverability of individual sites within the hearings the Council agreed to remove site HS6 from the Plan, amend their standardised assumptions on site delivery using evidence provided by site promoters and developers and to update the housing trajectory and the site allocation policies. Having considered the updated evidence this approach is sound.

- 2.3 The amendments made were to the individual build-out rates and lead-in times relating to individual sites based on developer information (where that information was available) rather than to the standard assumptions themselves. The approach became that where detailed information was available from developers in respect of their delivery rates, these will be used; otherwise the standard assumptions would remain in use as before. Except insofar as individual sites reported individual differences, the Inspector accepted the use of the standard assumptions *per se* in the Local Plan Examination and in the above paragraph states that this approach is sound.
- 2.4 The delivery rates and lead-in times from the updated trajectory used to provide updated evidence in the Local Plan Examination, incorporating the updated information as agreed by the Inspector, formed the starting point for the development of the trajectories used in the current annual position statement. Accordingly, they reflect the engagement that occurred during the Local Plan Examination.

Annual Position Statement Base Date 1st April 2019

- 2.5 For last year’s Annual Position Statement, the delivery on sites was updated to take account of completions up to the base date. Engagement was undertaken with developers and others, similar to the engagement undertaken for the current document. Delivery on sites was modified where appropriate. The draft APS was submitted to the Planning Inspectorate. The Inspector concluded that “satisfactory stakeholder engagement has been undertaken”.

- 2.6 The Inspector for the 2019 APS assessed the delivery at sites which remained disputed following engagement. The Inspector removed one site as not deliverable at the base date and revised delivery rates at two other sites. The Council incorporated these amendments to site delivery into the final APS, which therefore reflects the outcomes of the engagement on the Draft APS of 2019 as adjudicated by the Inspector on behalf of the Secretary of State.
- 2.7 The site delivery rates from the 2019 APS have been brought forward as the basis for the 2020 trajectories, modified in response to delivery and updates in planning status in 2019-20. The 2020 Draft APS base information therefore reflects site delivery assumptions as previously established through earlier engagement.

Pre-draft Engagement

- 2.5 In order that the draft Annual Position Statement was informed by the best available information, emails were circulated to site developers of all strategic sites (100 or more dwellings). The emails sent included the Council's projections for the individual site within the text of the email, for the developer's comment. Developers were asked to confirm whether the Council's projections were correct, and if not, what these should be. The emails sent are provided in Annex 1.
- 2.6 The information gained (Annex 2) from the pre-draft consultation was contained within the draft document in the Five-Year Housing Trajectory. Where necessary, the delivery rate or lead-in time was amended, and commentary is provided in the column with the title "Notes on deliverability and delivery, including justification for inclusion".
- 2.7 Further detail of the responses is provided in Section 3 below.

Consultation on the Draft Document

- 2.8 A draft version of the Annual Position Statement was produced for consultation between 11th June 2020 and 2nd July 2020. The draft document included all sections of the current document with the exception of this Engagement Statement, which has been added for the submission version.
- 2.9 The draft document included the five year and plan period trajectories, with delivery of sites adjusted to reflect the Council's best understanding at that time, including the reflection of information gained from the pre-draft consultation.
- 2.10 Section 6 of the draft document for consultation carried the following text:
- 6.1 *The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:*
- *The Council's overall methodology and assumptions, including lead-in times and build-out rates;*
 - *The Council's assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included in relation to their own site(s).*
- 6.2 *Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable.*

6.3 *The consultation runs from 11th June 2020 to 2nd July 2020.*

6.4 *All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement*

2.11 This consultation was sent to:

- all agents and consultants representing developers, land owners and site promoters;
- all infrastructure/utility providers;
- all statutory consultees; and
- all adjoining local authorities including upper-tier authorities

held on the Planning Policy database. In all 300 (exactly) consultees were sent the consultation directly.

2.12 The draft document was published on the Council's website. A press notice was published in the Blackpool Gazette and Lytham St. Anne's Express to draw the attention of any interested members of the wider public to the draft document. The publicity for the consultation is shown in Annex 3.

2.13 The consultation prompted responses from 16 individuals, agents, developers and other interested bodies. The detailed results of the consultation are set out in Section 3 of this statement.

2.14 The Council have considered the individual comments made through the engagement process, in relation to the delivery on individual sites. Where justified, the Council has made adjustments to the delivery on sites; otherwise the Council has provided justification for maintaining its position (Section 4).

2.15 The final version of the main Annual Position Statement to which this Engagement Statement is attached, shows updated information reflecting the engagement that has taken place.

2.16 The approach taken by the Council replicates that taken last year, except that, due to the time taken to complete all data recording of completions for 2019-20 under the COVID-19 restrictions, the time given for representors to respond has been compressed slightly. In addition, the email circular regarding delivery rates was not circulated to sites of less than 100 as the information was not considered useful in relation to the overall calculation.

2.17 The Inspector of the 2019 APS endorsed the engagement of the Council, concluding: ***"satisfactory stakeholder engagement has been undertaken"***.

3. Stakeholder Responses and the Council's Adjustments to Delivery

- 3.1 This section provides the responses that have been received from interested parties, and summarises the information and opinions provided. As noted in Section 2, developers of large sites have been given opportunities to respond twice, firstly through an email circular, and secondly through the consultation on the draft document. The results have therefore been provided in such a way to distinguish between the responses at the two stages.
- 3.2 The Council received 4 responses to the email circular. The actual responses are set out in Annex 2. The content of the responses is set out in the table below. Where an email was sent to the developer of a site, if no response was received this is specifically indicated; where the site was not part of the circular the box in the table is greyed-out.
- 3.3 The Council received 16 responses from the consultation on the Draft Annual Position Statement. The original responses are attached in Annex 4.
- 3.4 The Council received responses from Highways England, Marine Management Organisation, Historic England, the Canal and River Trust, Office of Nuclear Regulation, NHS Property Services, CPRE, Lancashire County Council School Planning Team, Natural England and Homes England offering no comments on the deliverability in the sites within the 5 year housing land supply.
- 3.5 The responses from the remaining six respondents vary in length. Again, information from the responses in relation to individual sites is shown in the table below. Much of the content of these responses is from third party representors, i.e. developers and their agents commenting on the delivery of the sites of other developers: where this is the case, it is clearly distinguished in the table. It should be noted that five of these six representors, even where they are the developer of sites within the supply, also have known financial interests in unallocated sites in the borough, or represent clients who do; three of these have undetermined planning applications for large-scale residential development. Therefore, they represent a position which could yield significant financial gain were the council not able to demonstrate a 5-year supply, owing to the triggering of the "tilted balance" when determining residential planning applications.
- 3.6 The broad profile of the respondents, and the wide scope of their responses, demonstrates a level of engagement in the process fully compliant with the requirements of the PPG.
- 3.7 Where delivery on sites is disputed, these sites are further considered in section 4. Where comments have been made that do not relate directly to the delivery of individual sites, or indeed to site delivery at all, these are dealt with in Tables 2, 3, 4 and 5.

Table 1: Schedule of Sites, Engagement Results and Site Delivery

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Lytham and St Annes sites of 10 or more dwellings				
HSS1 Queensway, St Annes		<p>Developer: no response received</p> <p>Cassidy & Ashton (third party): Turning to the individual sites, I repeat the difficulties in obtaining a comprehensive picture but what is evident is the continuing slowdown of delivery at the Queensway site and the impact that this may have upon the delivery of the Lytham Moss link road which itself is vital to the economic growth of the borough. Even the much reduced contribution from this site is over optimistic in the present circumstances and its contribution should be taken out of the calculations for now.</p>	36,26,36,27,0	27,26,36,27,9 See also disputed sites list
MUS4 Heyhouses Lane, St Annes (phase 1)		No comment received from any party	0,15,13,0,0	0,15,13,0,0
MUS4 Heyhouses Lane, St. Annes (phase 2)	No response received	No comment received from any party	15,30,30,30,30	15,30,30,30,30
HS2 Jubilee House, Lytham		<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party): 10.8 Full planning permission was granted in August 2013 for remodelling of an existing office block and the erection of 20 apartments. The permission was part implemented, with the completion of the office works in March 2015. No work on the residential element has commenced. The applicant advised Emery</p>	15,5,0,0,0	15,5,0,0,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>Planning in 2018 as part of our evidence for a planning appeal (Appendix HLS1 [see the original response in Annex 4 to this document]) that the residential component is on hold until suitable funding streams can be secured. There were also issues with car parking capacity on the site as the office development is now fully occupied.</p> <p>10.9 There is no evidence at all in the APS to counter our specific evidence from 2018 on the site being delivered and therefore we discount the 20 dwellings.</p>		
HS3 Ashton Nurseries, Lytham		No comment received from any party	12,0,0,0,0	12,0,0,0,0
HS11 The Galleries, 2-4 Kingsway, Lytham		<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.10 Full planning permission was granted November 2015 with a requirement for development to commence by November 2018. The property remains in use as auction rooms (Appendix HLS2) [<i>this provides the company's webpages: see the original response in Annex 4 to this document</i>] (currently closed due to Covid19) and the permission was not implemented. The property has been marketed for sale since November 2015 (Appendix HLS2) [advertisement for the site: see the original response in Annex 4 to this document] for commercial purposes (with the benefit of the planning permission), indicating that the applicant, who also owns the auction business, does not intend to bring forward the residential redevelopment themselves.</p> <p>10.11 Application 18/0966 was then approved which in essence renews the previous consent. The site continues to be marketed at the time of writing (Appendix HLS2). [advertisement for the site: see the original response in Annex 4 to this document]</p>	9,0,0,0,0	9,0,0,0,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		10.12 Given the site has had a consent for 5 years, has been marketed for in excess of 5 years and is still in use, we discount the 9 dwellings.		
HS14 AXA Lytham		<p>Developer: Gladman Homes who are developing the site are an associated company with Gladman Developments, who have provided a response in relation to a number of sites. They have not disputed site delivery on this, their own site.</p> <p>Emergy Planning for Wainhomes (third party):</p> <p>10.13 Planning permission was granted (Feb 2018) for specialist accommodation comprising 65 apartments for the elderly (Use Class C2) (Appendix HLS3 [see the original response in Annex 4 to this document]). As a residential institution falling outside of Class C3 of the use classes order it must be considered against the PPG. [quotes paras. 035 Reference ID: 68-035-20190722 and 016a Reference ID: 63-016a-20190626 of PPG]</p> <p>10.14 Using the same methodology as the LPA use for Valentines Kennels, there should be a discount of 30 dwellings.</p>	15,30,20,0,0	15,30,20,0,0 See also disputed sites list
HS15 Land to the West of Ballam Road, Lytham		No comment received from any party	7,0,0,0,0	7,0,0,0,0
HS60 Valentine Kennels, Wildings Lane, St Annes		<p>Emergy Planning for Wainhomes (third party):</p> <p>10.3 The APS states: “Local Plan allocated site. Council resolved at committee 15/1/2020 to approve application, subject to S106, adoption of shadow HRA (agreed) and planning conditions, for full planning permission for two storey c2 care village with 205 bedrooms, communal lounge and dining areas, residents library, cinema room and salon plus</p>	0,0,0,114,0	0,0,0,114,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>outside recreation area and car parking. Equivalent to 114 dwelling units in accordance with PPG.”</p> <p>10.4 The application has a resolution to approve at the January 2020 Planning Committee subject to a Section106 agreement. Therefore, at the base date there is not a planning permission and it should not be considered deliverable for the purposes of this APS. We are now some 6 months after committee and there is no correspondence on the planning file after 18th November 2019 and there is no evidence in the APS on progress with the Section106 agreement. From experience as a planning consultancy working on development projects across the country, the lack of a signed Section 106 6 months after a resolution to grant does raise concerns. The main reason is usually viability which if not agreed can result in the permission not being issued or if a change is agreed that it returns to planning committee.</p> <p>10.5 We also note that the Land Registry details (Appendix HLS11 [see the original response in Annex 4 to this document]) which has a restrictive covenant on the site. There are 6 covenants, the first 2 being:</p> <ol style="list-style-type: none"> 1. Not to erect on any part of the Property hereby conveyed any buildings erections or fixtures other than those intended to be used and in fact used in connection with the use of the land for the carrying on of the business of a market gardener poultry keeper kennel keeper or grazier 2. Not to erect any private dwellinghouse on the Property <p>10.6 We would expect the LPA to have set out clear evidence on this issue and how the permission can be implemented with such covenants.</p> <p>10.7 Therefore at this stage in the process, it cannot be considered deliverable until a planning permission is issued and confirmation that the site is available. We discount the 114 dwellings.</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>Gladman Developments (third party):</p> <p>The Council’s Draft Housing Trajectory table predicts that this site will deliver 114 units in a single year (2023/24). It records that the corresponding planning application was resolved to be approved on 15th January 2020 subject to the completion of a S106 and planning conditions.</p> <p>At the present time the Council’s website indicates that the corresponding S106 agreement is still to be agreed. Other than the information provided in the Council’s site delivery notes, no further evidence has been provided to support the authority’s assumption that this site will deliver 114 units as suggested.</p> <p>As a [<i>sic.</i>] site only had a resolution to grant planning permission at the base date of the Council’s assessment, and no clarity has been provided on when the accompanying S106 agreement will be resolved or when this scheme is likely to come forward, we believe that the 114 units forecast to be delivered from this site should be removed from the APS document at this stage.</p> <p>Conclusion – remove 114 dwellings from the Council’s supply.</p>		
<p>HS61 Land at Roseacre, Wildings Lane, St Annes</p>		<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.15 The Decision Notice on the application (Appendix HLS4 [see the original response in Annex 4 to this document]) is dated 6th November 2016. Condition 1 states: “The development must be begun not later than the expiration of three years beginning with the date of this permission.”</p> <p>10.16 There has been no discharge of conditions and despite a later Section 106 agreement, the permission expired on 6th November 2019.</p> <p>10.17 We discount 45 dwellings.</p>	<p>15,30,0,0,0</p>	<p>0,0,15,30,0</p> <p>See also disputed sites list</p>

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
<p>Hole in One, Forest Drive, Lytham St Annes</p>		<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.18 The application has a resolution to approve at the December 2019 Planning Committee subject to a Section106 agreement. Therefore, at the base date there is not a planning permission and it should not be considered deliverable for the purposes of this APS. Appendix HLS5 [see the original response in Annex 4 to this document] is an email exchange from the agent dated 25th January 2020 that is listed on the LPA’s online planning file raising viability issues. There is no subsequent correspondence so notwithstanding the base date point, there is concerns on viability.</p> <p>10.19 We discount the 27 dwellings.</p> <p>Gladman Developments (third party):</p> <p>This is another scheme that only befitted from a resolution to grant planning permission at the base date of the Council’s assessment. The Council’s corresponding delivery notes identify that this resolution was subject to access details and the agreement of a S106 agreement.</p> <p>At the present time the Council’s website indicates that the corresponding S106 agreement has yet to be agreed, some six months after the application was reported to the authority’s planning committee, and there is no evidence that the access details mentioned in the Council’s notes have been agreed.</p> <p>As a site that did not have planning permission at the base date of the Council’s assessment, and with no clarity on the status of the S106 and access issues, we believe that all 22 units should be removed from the Council’s deliverable land supply.</p> <p>Conclusion – remove 22 dwellings from the Council’s supply.</p>	<p>0,0,27,0,0</p>	<p>0,0,27,0,0</p> <p>See also disputed sites list</p>

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Lytham and St Annes small sites				
Moss Side Villa, Cartmel Lane, Lytham		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Land to rear of 3 Woodville Terrace, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to north- west of Edenfield, 2a Clifton Drive, Lytham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to east of Edenfield, 2a Clifton Drive		No comment received from any party	1,0,0,0,0	1,0,0,0,0
5 Orchard Road, St Annes		No comment received from any party	4,0,0,0,0	4,0,0,0,0
Land to side of 8 North Houses Lane, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
23-25 St Andrews Road North, Lytham St Annes		No comment received from any party	6,0,0,0,0	6,0,0,0,0
23 Clifton Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
126 Preston Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
149-151 St Albans Road, St Annes		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Office, 24 Wood Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Rear of 12 Park Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to rear of 157 St Annes Road East, Shepherd Road, St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Lytham United Reformed Church, Bannister Street, Lytham St Annes		(Completed site, included in draft list in error, but without any delivery shown for the 5-year period)	0,0,0,0,0	(Site removed from list, no reason for inclusion)
259 Inner Promenade, Lytham St. Annes		No comment received from any party	6,0,0,0,0	6,0,0,0,0
314 Clifton Drive North, Lytham St Annes		No comment received from any party	7,0,0,0,0	7,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Rear of 45 Warton Street, Lytham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
7 North Warton Street, Lytham		No comment received from any party	2,0,0,0,0	2,0,0,0,0
1 Tudor Buildings, South Westby Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Istanbul Restaurant, 26 Hastings Place, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Garages, 357 Clifton Drive, St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Basement, 357 Clifton Drive, St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
48 Clifton Street, Lytham St Annes		No comment received from any party	2,0,0,0,0	2,0,0,0,0
6 Lowther Terrace, Lytham St Annes		No comment received from any party	2,0,0,0,0	2,0,0,0,0
The Guardhouse, Rear of 205 Clifton Drive		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
South, Lytham St Annes				
87 Heyhouses Lane, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
1 Wood Street, Lytham St Annes		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Land opposite 15-23 Ribchester Road, Lytham St Annes		No comment received from any party	6,0,0,0,0	6,0,0,0,0
Synagogue, Orchard Road, St Annes		No comment received from any party	0,9,0,0,0	0,9,0,0,0
Railway Platform, St Annes		No comment received from any party	10,0,0,0,0	10,0,0,0,0
53 St Annes Road West, St Annes		No comment received from any party	3,0,0,0,0	3,0,0,0,0
10 St Annes Road West, St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
46 Clifton Street, Lytham		No comment received from any party	2,0,0,0,0	2,0,0,0,0
25 Seymour Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
45 Lightburne Avenue, Lytham St Annes		No comment received from any party	-2,0,0,0,0	-2,0,0,0,0
14 Windsor Road, Ansdell		No comment received from any party	1,0,0,0,0	1,0,0,0,0
30 & 31 South Clifton Street, Lytham		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Ravenscourt Rest Home, 286 Clifton Drive South, Lytham St Annes		No comment received from any party	6,0,0,0,0	6,0,0,0,0
19 Richmond Road, Lytham St Annes		No comment received from any party	-2,0,0,0,0	-2,0,0,0,0
93 Clifton Street, Lytham St Annes		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Rear of 300 Clifton Street, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
34 Rossall Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
13 Bannister Street, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
97-99 St Annes Road East, Lytham St Annes		No comment received from any party	7,0,0,0,0	7,0,0,0,0
Whispering Trees, Saltcotes Road, Lytham St. Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Northern Orthodontic Services Ltd, Back North Crescent, Lytham St. Annes		No comment received from any party	5,0,0,0,0	5,0,0,0,0
16a Church Road, St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
59 and 61 Westby Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
13 Church Road, Lytham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
24 Pollux Gate, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land and buildings to rear of 157 St Annes Road East, Shepherd Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
First and second floor of former HSBC, 5 Clifton		No comment received from any party	0,8,0,0,0	0,8,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Square, Lytham St Annes				
Flats 1-4 11 Victoria Road, Lytham St Annes		No comment received from any party	4,0,0,0,0	4,0,0,0,0
61A St Davids Road North, Lytham St Annes, FY8 2BT		No comment received from any party	1,0,0,0,0	1,0,0,0,0
2 & 4 Mythop Avenue, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Land adj 1A Malvern Road, Lytham St. Annes		No comment received from any party	0,2,0,0,0	0,2,0,0,0
11 Moorland Road, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
48 & 48a East Beach, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Flats 11 & 15 St Johns Court, Warton Street, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
220 Church Road, St. Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
34A Clifton Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Mirasol, 8 Islay Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
The Sunday School, Bannister Street, Lytham St. Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Chistlehurst, 12 Kintour Road, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
16 Shipley Road, Lytham St Annes		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Rear of 45 Warton Street, Lytham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Rear of 17 Market Square/3 Chapel Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
23 Seville Court, 22 Clifton Drive, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0
2 Grosvenor Street, Lytham St Annes		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Fylde-Blackpool Periphery sites of 10 or more dwellings				
HSS4 Coastal Dunes	No response received	No comment received from any party	45,45,45,45,6	34,45,45,45,17
MUS1 Cropper Road East (phase 1)	No response received	Developer: no response received [the developer is Wainhomes, whose agent is Stephen Harris of Emery Planning, who has made a response in relation to other sites but has made no comment in relation to this site and has not disputed the Council's anticipated delivery.] [see also phase 2 below]	7,0,0,0,0	7,0,0,0,0
MUS1 Cropper Road East (Moss Farm)		No comment received from any party	15,16,0,0,0	15,16,0,0,0
MUS1 Cropper Road East (Old House Lane site)	<p>it took Fylde circa 5 years to grant planning consent from application stage to consent.</p> <p>I think it's a bit rich to ask for a response within 7 working days. I would just suggest you use your projected data. Clearly housing numbers will be determined by the developer who secures the site.</p>	<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.20 The outline planning application was submitted in February 2015 and the decision was issued on 11th March 2020 (Appendix HLS6A [see the original response in Annex 4 to this document]). Condition 1 states that the timescale on the permission are:</p> <p>[a] The expiration of five years from the date of this permission; or</p> <p>[b] The expiration of two years from the final approval of the reserved matters,</p> <p>or in the case of approval on different dates, the final approval of the last such matter approved.</p> <p>10.21 As set out earlier the definition of "deliverable" is set out on page 66 of the 2019 Framework and states:</p> <p>[quotes NPPF Glossary definition of deliverable, underlines part (b)]</p> <p>10.22 It should be noted that the APS states: "Local Plan allocated site. Outline planning permission with access applied for granted</p>	0,15,30,30,30	0,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>11/3/2020. Applicant's response to pre-consultation email endorses the Council's projection but notes that the rate of delivery will depend on the developer who takes on the site.”</p> <p>10.23 Therefore there is no clear evidence on delivery. The applicant in this case states that “the rate of delivery will depend on the developer who takes on the site”. Therefore the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • If a buyer is found, a sale proceeds and is completed; • The chosen developer prepares and submits a reserved matters application; • The reserved matters is approved; • Works to commence development and build infrastructure before any completions. <p>10.24 There could not be a clearer example of a site not having clear evidence and not being in accordance with part (b) of the Framework and such sites have been consistently removed by Inspectors and the Secretary of State.</p> <p>10.25 We discount the 105 dwellings.</p> <p>Gladman Developments (third party):</p> <p>This is an allocated site in the Council’s Local Plan and is predicted to deliver a total of 105 dwellings in the current five-year period from 2021/22 onwards.</p> <p>The Council’s site delivery notes advise that the site is the subject [of] an outline planning permission, with all matters reserved except for access, granted on 11th March 2020. Further reserved matters applications will need to be submitted and approved before any dwellings can come forward, and there is currently no evidence that these are being prepared.</p>		

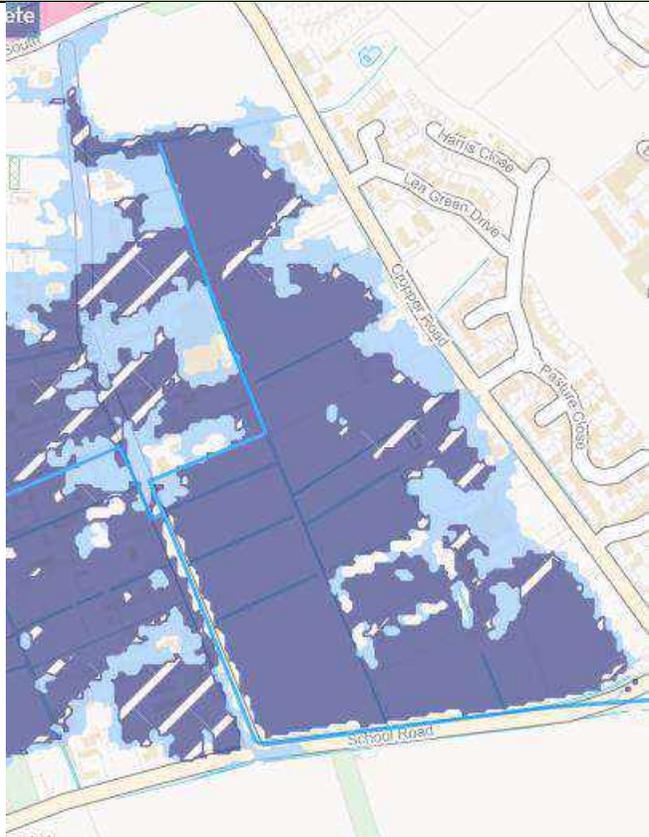
Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>The authority's delivery notes also describe the contents of some email correspondence with the applicant – this advises that actual delivery rates may differ from those recorded in the Council's trajectory, as these will "depend on the developer who takes on the site".</p> <p>This creates a level of uncertainty as to whether completions will come forward as suggested by the current applicant/the Council. It also highlights that the site will need to be taken on/ marketed to developers before any housing can be provided.</p> <p>We question whether sufficient evidence has been provided to demonstrate that this site will come forward as anticipated. As it only benefits from outline planning permission, and there is no robust evidence to support the Council's delivery assumptions, we believe that all 105 dwellings should be removed from the Council's supply at this stage.</p> <p>Conclusion – remove 105 dwellings from the Council's supply.</p>		
MUS1 Cropper Road East (phase 2)	No response received	<p>Developer: no response received [the developer's agent is Stephen Harris of Emery Planning, who has made a response in relation to other sites but has made no comment in relation to this site and has not disputed the Council's anticipated delivery.]</p>	30,30,20,0,0	15,30,30,5,0
MUS2 Whyndyke Farm	No response received	<p>Developer: [the developer's agent is Alban Cassidy, of Cassidy and Ashton, who have made a response in relation to other sites but has made no comment in relation to this site and has not disputed the Council's anticipated delivery.]</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.26 Whyndyke is a strategic site within Fylde but on the edge of Blackpool. The agent for the owner advised the Local Plan</p>	0,0,0,0,30	0,0,0,0,30 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>Examination of their lead in times and delivery rates. In their statement for Matter 5 (Appendix HLS7) they state:</p> <p><i>“In particular Queensway and Whyndyke Garden Village have each taken many years to progress to a reserved matters/outline application stage with no certainty of when delivery is likely to commence. Both are subject to s106 agreements of some complexity with the former reliant upon the delivery of a link road for which funding is not yet guaranteed and the latter the subject of ongoing negotiations of a cross boundary nature which has hindered progress for many years.</i></p> <p><i>At the time of preparing this statement, the s106 agreement for Whyndyke Farm remained incomplete despite first being supported by Committee in June 2015. The delay is not due to the developer, rather it relates to ongoing discussions between the other interested parties.</i></p> <p><i>It is therefore not clear when either site will commence.”</i></p> <p>10.27 In their statement to the Stage 3 hearing (Appendix EP7 [see the original response in Annex 4 to this document]), they state:</p> <p><i>“Given the ongoing failure of the respective local planning authorities, namely Fylde and Blackpool to agree to the terms of the s106 agreement for Whyndyke Farm, questions must begin to be asked about the extent to which this site will make a full contribution to the housing land supply of Fylde over the plan period.”</i></p> <p>10.28 The planning application (11/0221) was submitted in March 2011 and the decision (Appendix EP7) was issued on 5th June 2018. Condition 1 requires the first reserved matters application be submitted within three years from the date of this permission. All subsequent reserved matters applications shall be submitted no later than 12 years from the date of this permission and shall be commenced within two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter approved. No reserved</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>matters application has been submitted. On that point alone it should be excluded based on the same reasons as Site 6 above being contrary to part (b) of the deliverability test in the NPPF.</p> <p>10.29 This is also a site that has been in the AMR's since at least 2013 yet there has been no significant progress. Inspector Boniface made the following conclusion in his report to the 2019 APS:</p> <p><i>“MUS2 Whyndyke Farm, Preston New Road, Whitehills 23.</i></p> <p><i>This is a large site for some 1,310 dwellings. Outline planning permission was granted in June 2018, some 7 years after the site was first mooted. Whilst only 30 dwellings have been included in the 5-year trajectory in the final year, 2023/2024, the response from the developer is at best “lukewarm” indicating that no progress has been made since 2018. Here, there is not the clear evidence required to support the inclusion of this site and the supply figure should be reduced by removing 30 units.”</i></p> <p>10.30 There is no evidence to justify the continual inclusion of the site in Year 5 in the AMRs and now the APS. We therefore exclude the 30 dwellings from Year 5.</p> <p>Gladman Developments (third party):</p> <p>This is a long-standing proposal that received outline planning consent in 2015 for a mixed-use development including 1,400 residential dwellings, 20 ha of B2/B8 uses, a new primary school and two local neighbourhood centres.</p> <p>The Council's Draft Housing Trajectory table records that the applicant's agent is working towards a scheme for commencement, but further applications have been submitted to vary the extent of highway works needed at the initial stages.</p> <p>Despite delivery from this site being forecast within five years in a number of past housing land supply assessments, this has failed to materialise. We therefore question whether the assumption that 30</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>units will be delivered in year 2024/25, on the basis that a reserved matters application must be submitted by January 2021 is a robust assessment of delivery from this complicated site.</p> <p>Whilst we have no comments on the merits of this proposal, as it only currently benefits from outline planning permission, and with no certainty that completions will take place in 2024/25, we believe that 30 units should be removed from the Council’s assessment.</p> <p>Conclusion – remove 30 dwellings from the Council’s supply.</p>		
HSS5 Cropper Road West, Whitehills	No response received	<p>Developer: Emery Planning for Wainhomes</p> <p>10.31 This is a site in the adopted Local Plan. Wainhomes control the majority and BAK Developments control a parcel. Both parties have applications submitted and pending, which are:</p> <p>“17/0779 - Outline Application with access from Cropper Road and School Road for the proposed demolition of existing buildings and structures and residential development for up to 350 dwellings together with associated works and infrastructure”.</p> <p>19/0284 - Residential development of 142 dwellings with associated landscaping and infrastructure”</p> <p>10.32 The site was allocated and both parties maintain the sites are developable in the plan period. However following the allocation and the submission of the applications, the Environment Agency revised its flood mapping and a large proportion of the site was reclassified as Flood Zone 3 – see below.</p> <p>Extract from FRA:</p>	0,0,10,30,30	0,0,0,25,30 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>According to the EA Flood Map for Planning (Rivers and Sea) (Figure 2) the site is located in Flood Zone 1.</p>  <p>Figure 2: Environment Agency Flood Map for Planning (Rivers & Sea) (Source: EA website)</p> <p>Revised EA Flood Map:</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		 <p data-bbox="824 1023 1644 1465"> 10.33 In our response to the 2019 APS, we stated: “Both applicants are seeking resolution but for the last 9 months this has not been achieved. Further detail is provided below.” 10.34 Inspector Boniface, in his report to the 2019 APS stated: “HSS5 Cropper Road West, Whitehills (Site 1) & Cropper Road West (Bambers Lane), Whitehills (Site 2) 24. These are allocated sites in the Local Plan. An outline planning application for Site 1 has been submitted for up to 350 units and a full planning application has been submitted for Site 2 for up to 142 units. For Site 1 the trajectory shows delivery of 10 units in Year 4 and 30 units in Year 5. For Site 2 the trajectory shows 15 units in Year 3, 30 units in Year 4 </p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>and 30 units in Year 5. It appears that consultants for the developers have prepared Design Codes for these sites. The Environment Agency (EA) has issued a holding objection to the development of these sites following a reassessment of the flood risk. The applicants are responding to the EA and the Council consider the issues are technical and capable of resolution. On balance, given the progress to date, these allocations appear realistic.”</p> <p>10.35 It is now 12 months on and the EA maintain their objection.</p> <p>Application 17/0779</p> <p>10.36 The application was validated on the 11th September 2017 and in their letter dated 2nd August 2018 the Environment Agency provided a response on the application. The letter (Appendix HLS8 [see the original response in Annex 4 to this document]) states:</p> <p>“Due to a change in circumstances in relation to flood risk, we now wish to object to the application until a satisfactory FRA has been submitted to address this issue.</p> <p>10.37 Further information was submitted by the Applicant and a further response from the EA dated 2nd July 2019 (Appendix HLS8) has confirmed that their objection remains. The applicant is continuing to seek to address the objection but for the purposes of the APS the site should be excluded from the 5 year supply. If there is a resolution it may impact on the developable area and the number of dwellings that could be accommodated.</p> <p>10.38 Therefore it is necessary to discount 70 dwellings from years 3, 4 and 5. The site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.</p> <p>Gladman Developments (third party):</p> <p>This site is an allocation in the Council’s adopted Local Plan and is subject to an outline planning application for 350 dwellings.</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>However, as the authority's delivery notes describe, since the allocation was made the Environment Agency have remodelled the flood risk for the area, resulting in the majority of the site being placed [in] Flood Zones 2 and 3. A copy of the Environment Agency's latest flood map is provided as Appendix A to these submissions. [see the original response in Annex 4 to this document].</p> <p>Whilst it is apparent that the applicant is in discussions with the Environment Agency (EA) to find a solution that would enable the site to come forward, it is far from clear whether this dialogue is sufficiently advanced to justify the assumption that 70 units will be delivered from the site in the five-year period.</p> <p>Although we recognise that this site could provide housing over the longer term, given the current uncertainty created by the Environment Agency's revised position, and the fact that the site is yet to benefit from an outline planning consent, we believe that all 70 dwellings should be removed from the Council's deliverable land supply assessment.</p> <p>Conclusion – remove 70 dwellings from the Council's supply.</p>		
HSS5 Cropper Road West, (Bambers Lane site)	The figures stated are correct all things being well with the planning application.	<p>Developer: no further response received</p> <p>Emery Planning for Wainhomes (third party but applicant for adjoining site, has prepared joint documents with applicant relating to both sites):</p> <p>Application 19/0284</p> <p>10.39 This application was submitted in April 2019 by BAK Building Contracts Ltd. As with Application 17/0779 the Environment Agency objects to the application (Appendix EP8 [see the original response in Annex 4 to this document]). For the same reasons as our client's site, for the purposes of the APS the site should be excluded from</p>	0,15,30,30,24	0,15,30,30,24 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>the 5 year supply. We therefore discount 99 dwellings from years 2, 3, 4 and 5.</p> <p>10.40 As with our client’s parcel, the site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.</p> <p>Gladman Developments (third party)</p> <p>Similar to the site at Cropper Road West described above, this site is also an adopted Local Plan allocation, but has since been reclassified as Flood Zone 2 and 3 by the Environment Agency.</p> <p>The Council’s delivery notes again describe how the applicant has engaged consultants to prepare a hydraulic model to challenge the EA’s position, but it is far from clear whether this has addressed the EA’s concerns or led them to lift their holding objection to the applicant’s proposals.</p> <p>We recognise that this site has the potential to deliver housing over the longer-term, once the situation regarding the sit’s flood risk status has been resolved. However, in the absence of a solution to this matter, and any formal planning consent, we believe that all 99 dwellings should be removed from the Council’s deliverable housing land supply assessment.</p> <p>Conclusion – remove 99 dwellings from the Council’s supply</p>		
Fylde-Blackpool Periphery small sites				
40 Peel Hill, Whitehills		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Whitehills Farm Stables, Whitehill Road, Whitehills		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Warton sites of 10 or more dwellings				
HSS2 Blackfield End Farm (East site)	No response received	No comment received from any party	30,30,30,30,19	22,30,30,30,27
HSS2 Blackfield End Farm (West site)	No response received	<p>Developer: no response received</p> <p>Emergy Planning for Wainhomes (third party):</p> <p>10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister’s announcement of the ‘lockdown’ in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.</p> <p>10.61 Secondly, in terms of the definition of “deliverable”, any “clear evidence” provided by the Council to support the deliverability of sites cannot be relied on unless it has taken into account the impact that the Covid-19 will have on build rates.</p> <p>10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire. The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that</p>	30,30,30,30,30	22,30,30,30,30

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:</p> <p>“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.</p> <p>110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</p> <p>111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</p> <p>10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<ul style="list-style-type: none"> • Blackfield End Farm, Warton – 5 dwellings; • Land North of Blackpool Road, Kirkham – 5 dwellings; and, • Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings. <p>10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would expect build rates to reduce and that will be accounted for in the next APS.</p>		
HSS7 Highgate Park	No response received	No comment received from any party	30,30,10,0,0	22,30,18,0,0
HSS12 Land North of Freckleton Bypass, Warton	No response received	<p>Developer: Hollins Strategic Land</p> <p>4.1 The dAPS states that this site (ref: HSS12) will deliver as follows:</p> <p>2020/21 0</p> <p>2021/22 30</p> <p>2022/23 30</p> <p>2023/24 30</p> <p>2024/25 30</p> <p>4.2 HSL did not secure outline permission on this site but does have an interest in the land. An application for the approval of reserved matters was submitted by Countryside in January 2020 but remains pending nearly 6 months later.</p> <p>4.3 HSL is aware that there are significant unresolved issues with the application proposals which are proving difficult to overcome for the applicant. The Fylde Council Development Management department will be able to confirm this. Indeed, the DM Officer has stated that “there is no realistic prospect for these issues to be addressed comprehensively without a relatively sizeable reduction</p>	0,30,30,30,30	0,10,30,30,30 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>in the number of dwellings being proposed". There can be no certainty that the RM proposals will be approved.</p> <p>4.4 Indeed, at this stage, it is possible that the RM application could be withdrawn given the LPAs request for a sizeable reduction in the number of dwellings. If this does occur, it must be noted that the outline consent will have expired. As such, any developer would need to obtain a new outline permission and then RM approval or a full planning permission. While the site is an allocation, this would undoubtedly result in the site not being deliverable at this point in time.</p> <p>4.5 It is therefore considered that this site should not be included in the five-year supply at present.</p> <p>4.6 Should the Inspectorate deem otherwise on the basis of it being sufficient that a RM application is pending and could be approved if the significant issues can be overcome, it is considered that the delivery rates should not exceed the following:</p> <p>2020/21 0</p> <p>2021/22 10</p> <p>2022/23 30</p> <p>2023/24 30</p> <p>2024/25 30</p> <p>4.7 If the RM application is not withdrawn, it will not be approved until the Autumn at the earliest. A number of pre-commencement conditions will need to be discharged and there is significant upfront infrastructure to be provided, which the LPA is fully aware of. As such, it is highly unlikely that any significant number of dwellings would be delivered in 2020/21.</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.41 Outline consent was granted on Appeal in February 2017 for Warton East Developments Ltd. The APS states:</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>“Local Plan allocated site. Outline planning permission for 350 dwellings. Reserved matters application received 24/1/2020 for 350 dwellings for developer Countryside Properties; also full planning application received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties are known to have higher delivery rates, so the figure shown are considered very conservative”</p> <p>10.42 Therefore the site has no reserved matters consent at the base date so should be excluded on the basis of part (b) of the definition of deliverable in the Glossary to the NPPF. It should also be noted that the application also has an objection by the Highway Authority and Natural England (Appendices HLS9 [see the original response in Annex 4 to this document]). We discount the 120 dwellings at this stage. That can of course be reviewed in the APS next year.</p> <p>Gladman Developments (third party):</p> <p>This site is forecast to deliver 120 dwellings in the five-year period. However, whilst the Council’s delivery notes record that the site currently benefits from outline planning consent, the corresponding reserved matters application was submitted on 24th January 2020, and is yet to be determined.</p> <p>The Council’s delivery notes also describe how a further planning application seeking permission in full for an additional 14 units was submitted on 31st January 2020. As this application was undetermined at the base date of the Council’s assessment, these additional 14 dwellings should not currently contribute to the Council’s supply position.</p> <p>As the corresponding reserved matters application was undetermined at the base date of the Council’s assessment, and no evidence has been provided to demonstrate how this is progressing and any outstanding issues are being addressed, we believe that all</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>120 dwellings must be excluded from the authority's deliverable land supply at this stage.</p> <p>Conclusion – remove 120 dwellings from the Council's supply.</p>		
HSS13 Clifton House Farm, Lytham Road, Warton	<p>Due to the impact of Covid-19 on the house building industry, and requirements for offsite highway works which requires input and agreement from Lancashire County Council there will be a delay in delivery. We anticipate that delivery will therefore be as follows:</p> <p>0 in 2020-21, 15 in 2021-22, 20 in 2022-23, 20 in 2023-24 and 20 in 2024-25 with 21 outside the 5 year period.</p>	<p>Developer: no further response received.</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.43 Outline consent was granted on Appeal in February 2017. Reserved Matters was approved on 23rd March 2020. A further duplicate Reserved Matters application is pending. The applicant is Hallam Land Management who are not housebuilders. They are clearly seeking to obtain a implementable consent to ensure the outline permission does not expire.</p> <p>10.44 Therefore there is no clear evidence on delivery and the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • If a buyer is found, a sale proceeds and is completed; • The chosen developer prepares and submits a reserved matters application or further application to vary house types; • The reserved matters and/or further applications are approved; • Works to commence development and build infrastructure before any completions. <p>10.45 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework. We discount the 75 dwellings.</p> <p>Gladman Developments (third party):</p>	15,30,30,21,0	0,15,20,20,20 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>The site is predicted to deliver 96 dwellings in the five-year period. It benefits from outline planning consent, with a subsequent reserved matters application being approved on 23rd March 2020.</p> <p>However, the Council’s Five-Year Housing Trajectory records that a further reserved matters application is currently pending after being submitted on 5th February 2020. The Council’s Public Access system records that this is a duplicate submission of the earlier reserved matters consent, and furthermore that it has been submitted by the land promoter and not a developer.</p> <p>Although we acknowledge that a reserved matters consent was in place at the base date of the Council’s latest assessment, it is unclear whether this will be implemented given the new reserved matters submission that has since been made. It is also unclear whether the predicted delivery rates will be achievable with this consent in place, given that the site will likely have to be marketed to a developer.</p> <p>Whilst we do not dispute that this site will come forward in the longer term, we currently believe that there is insufficient certainty to include it within the Council’s five-year supply. We therefore believe that all 96 dwellings should be removed from the authority’s APS at this stage.</p> <p>Conclusion – remove 96 dwellings from the Council’s supply.</p>		
Brook Mount, 4 Lytham Road, Warton		<p>Developer: no response received.</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.46 The APS states:</p> <p>“Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019”.</p>	0,0,26,0,0	0,0,26,0,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>10.47 The site has no permission at the base date so must be excluded.</p> <p>Gladman Developments (third party):</p> <p>This site is predicated [<i>sic.</i>] to deliver 26 units in year 2022/23. However, the Council's site delivery notes describe that it is subject to an undetermined planning application that was received on 2nd July [<i>sic.</i>] 2020. No further evidence is provided to support the site's inclusion in the Council's draft five-year housing trajectory.</p> <p>As a site that is yet to receive planning permission, and with no further evidence or updates on its delivery prospects, we believe that all 26 units should be removed from the Council's land supply assessment.</p>		
Warton small sites				
Great Carr Side Farm, Wrea Brook Lane, Warton		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Warton Hall Farm, Lodge Lane, Warton		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Barn, Warton Hall Farm, Lodge Lane, Warton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Rose Cottage, Bryning Lane, Warton		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
121-123 Lytham Road, Warton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
206-208 Lytham Road, Bryning with Warton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Sykes Hall Farm, 99 Church Road, Warton		No comment received from any party	0,1,0,0,0	0,1,0,0,0
Kirkham and Wesham sites of 10 or more dwellings				
HSS8 The Pastures, Fleetwood Road, Wesham	We currently expect that the remaining properties on the development will be completed this year. We did shut down for a few weeks but are back on site now working in a limited capacity but are not currently expect any extended hours' working.	No further representation received.	44,9,0,0,0	53,0,0,0,0
HSS9 Land North of Blackpool Road, Kirkham (phase 1)		No further representation received	2,0,0,0,0	2,0,0,0,0
HSS9 Land North of Blackpool Road, Kirkham (phase 2)	None received	No comment received from any party	30,5,0,0,0	22,13,0,0,0
HSS9 Land North of Blackpool Road, Kirkham (phase 3)	None received	Developer: no response received Emery Planning for Wainhomes (third party):	15,30,30,30,30	15,30,30,30,30

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister’s announcement of the ‘lockdown’ in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.</p> <p>10.61 Secondly, in terms of the definition of “deliverable”, any “clear evidence” provided by the Council to support the deliverability of sites cannot be relied on unless it has taken into account the impact that the Covid-19 will have on build rates.</p> <p>10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire. The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:</p> <p><i>“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also</i></p>		See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p><i>likely to be reduced with a consequent effect on the buying and selling of property.</i></p> <p><i>110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</i></p> <p><i>111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</i></p> <p>10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:</p> <ul style="list-style-type: none"> • Blackfield End Farm, Warton – 5 dwellings; • Land North of Blackpool Road, Kirkham – 5 dwellings; and, • Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings. <p>10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		expect build rates to reduce and that will be accounted for in the next APS.		
HS32 West End Residential Park		No comment received from any party	15,12,0,0,0	15,12,0,0,0
HS57 Brook Farm Dowbridge		<p>Developer: Hollins Strategic Land (site promoter):</p> <p>3.1 The dAPS states that this site (ref: HS57) will deliver as follows: 2019/20 30 2020/21 30 2021/22 30 2022/23 30 2023/24 30</p> <p>3.2 HSL achieved outline permission on this site, Story Homes (SH) secured Reserved Matters Approval and development is underway.</p> <p>3.3 However, as confirmed in the HSL Statement on the 2019 AMR, SH had stated that the site would deliver a maximum of 30 dwellings per annum (dpa). That, of course, did not take account of the COVID pandemic.</p> <p>3.4 HSL was not able to obtain the views of SH on this site; a number of staff are on furlough leave due to the COVID-19 pandemic. However, site HS57 is in close proximity to HS70 and HH has stated that the SH build delivery rate has also been affected by the COVID-19 pandemic; it is estimated that it could reduce to 25 dpa for 2020/21 and 2021/22.</p> <p>3.5 The delivery rate is therefore expected to be as follows: 2020/21 25 2021/22 25 2022/23 30 2023/24 30</p>	30,30,30,30,30	25,25,30,30,30

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>2024/25 30</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister’s announcement of the ‘lockdown’ in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.</p> <p>10.61 Secondly, in terms of the definition of “deliverable”, any “clear evidence” provided by the Council to support the deliverability of sites cannot be relied on unless it has taken into account the impact that the Covid-19 will have on build rates.</p> <p>10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire. The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:</p> <p><i>“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of</i></p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p><i>developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.</i></p> <p><i>110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</i></p> <p><i>111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</i></p> <p>10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:</p> <ul style="list-style-type: none"> • Blackfield End Farm, Warton – 5 dwellings; • Land North of Blackpool Road, Kirkham – 5 dwellings; and, • Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings. 		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would expect build rates to reduce and that will be accounted for in the next APS.</p>		
HS63 Campbells Caravans		<p>Developer: no response received</p> <p>Emergy Planning for Wainhomes (third party):</p> <p>10.48 The APS states: “Local Plan allocated site. Outline planning permission for 30 dwellings approved with S106 17/5/2019.”</p> <p>10.49 As with other sites, there is no clear evidence on delivery and having an outline planning application does not justify inclusion as a deliverable site based on the Glossary in the NPPF. Therefore the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • A sale proceeds and is completed if a buyer can be found; • The chosen developer prepares and submits a reserved matters application; • The reserved matters is approved; • Works to commence development and build infrastructure before any completions. <p>10.50 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework. We discount the 30 dwellings.</p>	0,15,15,0,0	<p>0,0,0,0,0</p> <p>The Council has reconsidered this site in response to the representation and has removed it from the supply.</p>

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Former Wesham Park Hospital, Derby Road, Wesham		<p>Developer: response received from the site owner (NHS Property Services) but does not make reference to the individual site.</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.51 The APS states: “Outline planning application for 51 dwellings on previously-developed site within settlement. Principle of development accepted. Council's Planning Committee resolved to grant outline permission on 18/3/2020 subject to S106 agreement relating to affordable housing, contributions for education and public open space. NHS Property Services announced through local press (4/6/2020) that demolition would commence on 8/6/2020 and take 5 months.”</p> <p>10.52 Reference is made to an article in the local press. As with all the LPA’s evidence none of it is published as part of this APS which is not acceptable for the reasons set out earlier.</p> <p>10.53 We enclose an article (Appendix HLS10 [see the original response in Annex 4 to this document]) dated 5th June 2020. “NHS Property Services, which has been tasked with the demolition, says the repurposing of the vacant site, in Derby Road, will help the NHS make significant savings on running costs and better use of the space.</p> <p>After the site has been cleared, it is proposed that half of the land will be developed for new clinical use, with the local CCG having already indicated its aim to develop a new state of the art health centre, which would provide capacity for the two GP practices in Kirkham as well as a variety of community services.</p> <p>The other half of the site has been determined to not be of use for clinical purposes and looks set to be made available for sale.”</p> <p>10.54 As with other sites, there is no clear evidence on delivery and having an outline planning application does not justify inclusion as a</p>	0,0,15,30,6	0,0,0,0,0 The Council has reconsidered this site in response to the representations and has removed it from the supply.

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>deliverable site based on the Glossary in the NPPF. Therefore the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • A sale proceeds and is completed if a buyer can be found; • The chosen developer prepares and submits a reserved matters application; • The reserved matters is approved; • Works to commence development and build infrastructure before any completions. <p>10.55 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework and why they should not be included.</p> <p>10.56 We discount the 51 dwellings.</p> <p>Gladman Developments (third party):</p> <p>The Council's delivery notes describe how the authority's planning committee resolved to grant outline planning permission for this site on 18th March 2020, subject to the completion of a S106 agreement.</p> <p>The Council's notes further advise that demolition of the existing buildings was due to commence on 8th June 2020 and last for a period of 6 months, based on an article that was published in the local press. However, no further evidence has been provided to support the authority's delivery assumptions.</p> <p>As a site that only had a resolution to grant planning permission at the base date of the Council's housing land supply assessment, and with no clarity on the status of the accompanying S106 agreement and when this is likely to be agreed, we believe that all 51 dwellings should be removed from the authority's deliverable land supply assessment.</p> <p>Conclusion – remove 51 dwellings from the Council's supply.</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Kirkham and Wesham small sites				
Willow Glen, 96 Dowbridge, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
68 Poulton Street, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land adj Nookwood Cott, Blackpool Road, Kirkham		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Land off Medlar Lane, Medlar		No comment received from any party	1,0,0,0,0	1,0,0,0,0
The Manse, Marsden Street, Kirkham		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
The Homestead, Ribby Road, Kirkham		No comment received from any party	0,1,0,0,0	0,1,0,0,0
10 West View, Wesham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land rear of the Barn House, Dowbridge, Kirkham		No comment received from any party	0,1,0,0,0	0,1,0,0,0
3-5 Blackpool Road, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Land adj 14 Myrtle Drive, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
58-69 Poulton Street, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land adj Dowbridge Farm, Dowbridge, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land south of Eaton Place, Kirkham		No comment received from any party	3,0,0,0,0	3,0,0,0,0
66 Marsden Street, Kirkham		No comment received from any party	2,0,0,0,0	2,0,0,0,0
24 Poulton Street, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
53 Ribby Road, Kirkham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Bradkirk Hall Farm, Weeton Road, Wesham		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Freckleton sites of 10 or more dwellings				
HS38 Land rear of High Meadows, Lower Lane, Freckleton		No comment received from any party	11,0,0,0,0	11,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Freckleton small sites				
197 Kirkham Road, Freckleton		<p>Developer: no response received</p> <p>Gladman Developments (third party):</p> <p>This scheme is predicated [<i>sic.</i>] to deliver 7 dwellings in year 2020/21 after receiving a resolution to grant planning permission on 15th January 2020.</p> <p>However 3 months of 2020/21 have already passed, and there is no evidence that the corresponding S106 agreement has been finalised and signed. Whilst we recognise that there is a reasonable prospect of completions from this site coming forward within the five-year period, this is considered to be an ambitious timescale.</p> <p>Although this is a 'small site', in the absence of a signed S106 agreement at the base date of the Council's assessment, we also believe that there is a case to remove all 7 units from the Council's land supply assessment.</p> <p>Conclusion – remove 7 dwellings from the Council's supply.</p>	7,0,0,0,0	7,0,0,0,0 See also disputed sites list
1&2 Ribble View, Preston Old Road, Freckleton		No comment received from any party	-1,0,0,0,0	-1,0,0,0,0
Land between 7-9 Marquis Drive, Freckleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
33 Bunker Street, Freckleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Longacre Cottage, Kirkham Road, Freckleton		No comment received from any party	2,0,0,0,0	2,0,0,0,0
58 and Land to the Rear of Preston Old Road Freckleton		No comment received from any party	9,0,0,0,0	9,0,0,0,0
Willow View Cottage, Kirkham Road, Freckleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Former Piggeries, Poolside, Freckleton		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Poolside Farm, Poolside, Freckleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to rear of 1 Strike Lane, Freckleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Elswick site of 10 or more dwellings				
HS72 Land North of Mill Lane, Elswick		<p>Developer: Barton Willmore for Tom Rowe (site owner)</p> <p>Our Client owns a parcel of land located to the north of Mill Lane and to the south of Bonds Lane in Elswick. The Site extends to 4.7ha and comprises flat open farmland, with a large pond in the centre. The Site is relatively rectangular in appearance and is bound by trees and hedgerows.</p> <p>To be considered deliverable in accordance with the NPPF, sites identified for housing within the APS should be available, suitable and have a realistic prospect of housing being delivered within a</p>	15,30,5,0,0	0,15,30,5,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>five-year period. We set out how the Site meets each of these elements in further detail below.</p> <p>Availability</p> <p>The Site is within the ownership of our Client and is available for development now. The land is not subject to any restrictive covenants that would prevent the Site from being developed for housing and there are no current uses on the Site that need to be relocated to allow development to occur. The Site should, therefore, be considered available for housing in the next five years.</p> <p>Suitability</p> <p>The Site sits within the settlement boundary of Elswick, identified as a sustainable location for housing growth within the adopted Fylde Local Plan to 2032. The Site is free from physical constraints and there are no specific landscape, ecological or heritage designations which would impact upon the suitability of the Site for the housing.</p> <p>Outline planning permission (LPA ref. 16/0180) for a residential development of up to 50 dwellings and associated infrastructure was granted on 28th November 2017. An application for approval of reserved matters pursuant to outline planning permission 16/0180 for the layout, scale, appearance, and landscaping for the development of 50 dwellings with associated open space and infrastructure was subsequently approved on 12th October 2018 (LPA ref. 18/0318). Upon the grant of outline planning permission, the Site was allocated for the development of circa. 50 dwellings in the adopted Fylde Local Plan to 2032.</p> <p>Although the Site is yet to be developed, the extant planning permission and its allocation in the Fylde Local Plan demonstrates that the Site is suitable for residential development now and is free from any physical or technical constraints that would prohibit its developments. In this context, the Site should be considered suitable to accommodate housing in the next five years.</p> <p>Deliverability</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>As set out above, the Site benefits from outline planning permission and reserved matters approval for the development of 50 dwellings (LPA ref. 16/0180 and 18/0318). Condition 1 of outline permission 16/0180 requires:</p> <p>Applications for approval of reserved matters must be made no later than the expiration of three years from the date of this permission and the development must be begun no later than:</p> <ul style="list-style-type: none"> • The expiration of three years from the date of this permission (28th November 2020); or, • Two years from the date of approval of the last of the reserved matters to be approved (10th October 2020), whichever is the later. <p>Story Homes, the applicant for both applications, is no longer proposing to develop the Site. However, the Site still benefits from an extant outline planning permission that can be implemented by another housebuilder or developer.</p> <p>The NPPF and NPPG requires sites with outline planning permission for major development to provide clear evidence that housing completions will begin on site within five years.</p> <p>We can confirm that our Client has been in discussions with another housebuilder to submit a fresh application for reserved matters on the Site. However, progress on the application has stalled in recent months due to the uncertainties in the market surrounding the impact of the COVID19 pandemic. This means approval of reserved matters is unlikely to be achievable before 28th November 2020 in accordance with condition 1 of the outline consent.</p> <p>The economic impacts of the COVID19 pandemic on the deliverability of sites and the housing market is acknowledged withing the Draft APS. In response to concerns from the development industry the Rt. Hon. Alok Sharma MP led the Business and Planning Bill before Parliament on 25th June 2020. The Bill will extend the lifetime of all planning permissions due to expire from the start of lockdown on 23rd March 2020 until the end of this</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>year to 1st April 2021. The Bill will come into force 28 days after it is passed by Parliament.</p> <p>The introduction of the Business and Planning Bill will extend the lifetime of the extant outline planning permission until 1st April 2021 and would allow further time for the interested housebuilder to gain reserved matters approval. It is understood from our Client that the interested party intends to submit a reserved matters application in Autumn/Winter 2020 to ensure it is approved prior to the planning permission expiring. Conditions will be discharged in the early part of 2021 with works expected to start on site in Spring/Summer 2021.</p> <p>Set in this context, the housing trajectory at Appendix 1 of the APS should be amended as follows:</p> <p>Year 1 2020/21: 0</p> <p>Year 2 2021/22: 15</p> <p>Year 3 2022/23: 30</p> <p>Year 4 2023/24: 5</p> <p>Year 5 2024/25: 0</p> <p>To summarise, the Site benefits from outline planning permission and our Client has confirmed that a reserved matters application will be submitted and approved prior to the permission expiring on 1st April 2021 with works expected to start on site in Spring/Summer 2021. The Site should, therefore, be considered deliverable for housing in the next five years in accordance with paragraph 73 of the NPPF.</p>		
HS73 Land North of Beech Road, Elswick		<p>Developer: Barton Willmore for Tom Rowe (site owner)</p> <p>Land north of Beech Road, Elswick (Ref: HS73)</p> <p>Our Client owns a parcel of land located to the north of Beech Road in Elswick. The Site is irregular in shape and comprises 2.6ha of flat open farmland bound by trees and hedgerows to the north and</p>	15,30,5,0,0	0,15,30,5,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>east, Beech Road to the south and residential development on Beech Road to the west.</p> <p>To be considered deliverable in accordance with the NPPF, sites identified for housing within the APS should be available, suitable and have a realistic prospect of housing being delivered within a five-year period. We set out how the Site meets each of these elements in further detail below.</p> <p>Availability</p> <p>Like the Site above, this Site is also within the ownership of our Client and is available for development now. The land is not subject to any restrictive covenants that would prevent the Site from being developed for housing. Although there are agricultural buildings on the Site they are not in active use and the principle of demolishing them has been accepted through planning permission reference 16/0645. The Site should, therefore, be considered available for housing in the next five years.</p> <p>Suitability</p> <p>The Site sits within the settlement boundary of Elswick, identified as a sustainable location for housing growth within the adopted Fylde Local Plan to 2032. Again, the Site is free from physical constraints and there are no specific landscape, ecological or heritage designations which would impact upon the suitability of the Site for the housing.</p> <p>Planning permission (LPA ref. 16/0645) for the erection of 50 dwellings to be accessed from Beech Road with associated landscaping, pumping station and electricity sub-station following the demolition of existing agricultural buildings was granted on 28th November 2017. Upon the grant of planning permission, the Site was allocated for the development of 50 dwellings in the adopted Fylde Local Plan to 2032.</p> <p>A variation of condition application to allow for the substitution of the approved house types across the Site was submitted by Kingswood Homes on 28th February 2020 (ref. 20/0168). This</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>application is currently pending determination. However, an updated materials schedule and site plan was submitted in support of the application on 9th June 2020. This demonstrates Kingswood Homes commitment towards the positive determination of the application.</p> <p>Although the Site is yet to be developed, the extant planning permission and its allocation in the Fylde Local Plan to 2032 demonstrates that the Site is suitable for residential development now and is free from any physical or technical constraints that would prohibit development. In this context, the Site should be considered suitable to accommodate housing in the next five years.</p> <p>Deliverability</p> <p>The NPPF states sites which involve major development and have detailed planning permission should be considered deliverable until the permission expires unless there is clear evidence that homes will not be delivered within five years.</p> <p>As set out above, the Site benefits from planning permission for the development of 50 dwellings (LPA ref. 16/0645). Condition 1 of planning permission reference 16/0180 requires the development permitted to begin no later than 3 years from the date of the decision (effectively the 28th November 2020).</p> <p>Like the Site at Mill Lane, the introduction of the Business and Planning Bill will extend the lifetime of the extant planning permission until 1st April 2021. Kingswood Homes has a pending application to vary the house types approved as part of this planning permission (LPA ref. 20/0168) which demonstrates their commitment towards achieving planning permission and delivering development on the Site.</p> <p>Our Client has confirmed that this application is expected to be determined within the next two months and subject to approval the conditions will be discharged autumn/winter 2020 with works expected to start on site in early 2021. Set in this context, the housing trajectory at Appendix 1 of the APS for this Site is correct.</p>		

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>To summarise, the Site benefits from planning permission and the Site will be delivered by Kingswood Homes who have a pending application to vary the house types approved as part of the original planning permission. The Site should, therefore, be considered deliverable for housing in the next five years in accordance with paragraph 73 of the NPPF.</p> <p>Gladman Developments (third party):</p> <p>This site is predicted to deliver 15 dwellings in year 2020/21, followed by 30 units in 2021/22 and 5 in 2022/23. However, the Council's notes advise that the applicant has recently submitted an application to vary Condition 2 of the original planning permission relating to housing types.</p> <p>It appears that this variation of condition application is still to be determined. Although there is a prospect that all 50 units could come forward in the five year period, at the very least we would suggest that the Council's delivery timescales need to be amended to reflect the fact that 15 dwellings are unlikely to be delivered in 2020/21.</p> <p>Conclusion – question the Council's projected timescales</p>		
Elswick small sites				
Gorst Farm (Barn), Lodge Lane, Elswick		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Gorst Farm (land), Lodge Lane, Elswick		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Merfield, Copp Lane, Elswick		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Tiny Paws Cattery, Mill Lane, Elswick		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Lands adj Hazlenut Cottage, Langtree Lane, Elswick		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land opp Farnah and Wynwood, Beech Road, Elswick		No comment received from any party	0,6,0,0,0	0,6,0,0,0
Staining small sites				
Land to rear of 79 Chain Lane/ Occupation Lane, Staining		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Land adj to Mill Cottage, Mill Lane, Staining		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Wrea Green sites of 10 or more dwellings				
HS45 Rear of 54 Bryning Lane, Wrea Green		No comment received from any party	15,12,0,0,0	15,12,0,0,0
HS47 Land North of North View Farm, Wrea Green		Developer: no response received Emery Planning for Wainhomes (third party): 10.57 The APS states:	0,21,0,0,0	See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>“Local Plan allocated site. Planning Committee resolved 12/2/2020 to grant full planning permission subject to S106. Production of the S106 has been undertaken and matters of detail within it are being agreed prior to being finalised and signed.”</p> <p>10.58 The site has no permission at the base date so should be excluded.</p> <p>Gladman Developments (third party):</p> <p>This is another scheme that only benefitted from a resolution to grant planning permission at the base date of the Council’s assessment, subject to signing a S106 agreement (which is still to be agreed).</p> <p>Applying the strict application of the principles endorsed by the Woolpit and Bures Hamlet Inspectors described earlier in these submissions, we believe that there is a case for removing all 21 dwellings from the Council’s land supply assessment.</p> <p>Conclusion – remove 21 dwellings from the Council’s supply.</p>		
Wrea Green small sites				
Langtons Farm, Ribby Road, Wrea Green		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to rear of 60 Bryning Lane, Wrea Green		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land to rear of 91 Ribby Road, Wrea Green		No comment received from any party	3,0,0,0,0	3,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Newfold Farm, Browns Lane, Wrea Green		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Clifton site of 10 or more dwellings				
HS49 Land North of Preston Old Road, Clifton		Developer: no response received [the developer is Wainhomes, whose agent is Stephen Harris of Emery Planning, who has made a response in relation to other sites but has made no comment in relation to this site and has not disputed the Council's anticipated delivery.]	23,0,0,0,0	22,1,0,0,0
Newton site of 10 or more dwellings				
HS52 Cobweb Barn, Oak Lane, Newton		<p>Developer: no response received</p> <p>Emery Planning for Wainhomes (third party):</p> <p>10.59 An outline application for 30 dwellings was approved in July 2017. However a new planning application (2003115/FUL has been submitted but not determined at the base date so should be excluded.</p> <p>Gladman Developments (third party):</p> <p>This is a site for 30 affordable dwellings, with 15 completions due in 2022/23 and 15 in 2023/24. However, the site is currently the subject of an undetermined planning application, and no further site-specific evidence has been provided to justify its inclusion in the Council's land supply assessment.</p> <p>Whilst there is a reasonable prospect that all 30 dwellings could be completed in the five-year period, there is no planning permission in place or evidence to confirm the site's deliverability at the base date of the Council's assessment. We therefore believe that there is</p>	0,0,15,15,0	0,0,15,15,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		<p>a case to remove all 30 dwellings from the authority's land supply trajectory.</p> <p>Conclusion – remove 30 dwellings from the Council's supply.</p>		
<p>HS70 Land West of Woodlands Close, Newton</p>		<p>Developer: Hollins Strategic Land (site promoter):</p> <p>2.1 The dAPS states that this site (ref: HS70) will deliver as follows:</p> <p>2020/21 25</p> <p>2021/22 19</p> <p>2022/23 0</p> <p>2023/24 0</p> <p>2.2 HSL secured outline permission for this site and Hollins Homes (HH) (sister company to HSL) secured reserved matters approval and is developing the site. HH has stated that the impact of COVID has slowed down the build progress this year and will continue to affect it with new measures having to be adhered to.</p> <p>2.3 HH has also stated that no housebuilders are selling well in the area at present and many of the reservations that have been taken are subject to the purchasers selling their own house. This chain creates uncertainty. COVID-19 and the surrounding job uncertainty has also led to viewers holding-off committing to a purchase.</p> <p>2.4 The delivery rate is therefore expected to be as follows:</p> <p>2020/21 19</p> <p>2021/22 20</p> <p>2022/23 10</p> <p>2023/24 0</p> <p>2024/25 0</p> <p>2.5 It is acknowledged that this reduction in delivery/annum would not impact on the overall five year housing land supply. It does</p>	<p>25,19,0,0,0</p>	<p>19,20,10,0,0</p>

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		however demonstrate the impact of the COVID-19 pandemic. While it is too early to know the full effects, it is evident that it has slowed down delivery during 2020/21 and 2021/22 at site HS70.		
Newton small sites				
Barnfield, New Hey Lane, Newton		No comment received from any party	0,1,0,0,0	0,1,0,0,0
Woodlands, Bryning Lane, Newton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Clifton Grange Farm, Blackpool Road, Newton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Norcross, Parrox Lane, Newton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Pathways, Blackpool Road, Newton		No comment received from any party	0,4,0,0,0	0,4,0,0,0
Singleton small sites				
Woodlands, Lodge Lane, Singleton		No comment received from any party	4,0,0,0,0	4,0,0,0,0
Riverside, Poolfoot Lane, Singleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Silver Ridge, Lodge Lane, Singleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Worsicks Farm, Weeton Road, Singleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
The Croft, 117 Mains Lane, Singleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land adj 195 Mains Lane, Singleton		No comment received from any party	9,0,0,0,0	9,0,0,0,0
29 Mains Lane, Singleton		No comment received from any party	7,0,0,0,0	7,0,0,0,0
Greenways, 77 Mains Lane, Singleton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land between Hillcrest and Normandy, Mains Lane, Singleton		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Weeton site of 10 or more dwellings				
HS64 Land West of Church Road, Weeton		No comment received from any party	15,24,0,0,0	15,24,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Weeton small sites				
Land adj Knowsley Farm, The Green, Weeton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Shorrocks Barn, Back Lane, Weeton		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Ream Hills, Mythop Road, Weeton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Mere Court Stud, Mythop Road, Weeton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Todderstaffe Hall Farm, Extension of Todderstaff Road, Weeton		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Greenhalgh small sites				
Catterall Hall Farm, Fleetwood Road, Greenhalgh		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land at Six Acre Field, Bradshaw Lane, Greenhalgh		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Cornah Row Fm., Fleetwood Old Road, Greenhalgh		No comment received from any party	4,0,0,0,0	4,0,0,0,0
Smithy Farm, Fleetwood Road, Greenhalgh		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Little Eccleston site of 10 or more dwellings				
HS56 Sunnydale Nurseries, Garstang Road, Little Eccleston		No comment received from any party	5,0,0,0,0	5,0,0,0,0
Merlewood Country Park, Cartford Lane, Little Eccleston		<p>Developer: no response received</p> <p>Gladman Developments (third party):</p> <p>This is a scheme for 82 residential park homes following an appeal to remove a previous occupancy condition relating to the site. This condition appears to have restricted the permanent use of the site to 8 months of the year between 1st March and 31st October, with only holiday use allowed in the remaining four-month period.</p> <p>However, reviewing the associated appeal decision and supporting documents, it is unclear how this change in position will be implemented. The appellant's statement of case refers to the c.140 caravans that are currently present on the site being replaced by 82 modern park homes, but there are no timescales associated with this. It is presumably these park homes that will be occupied on a permanent basis.</p> <p>Whilst we accept that the recent appeal decision would allow the permanent occupation of the site now (albeit limited to 82 caravans), if it is the intention that this will only happen once the</p>	82,0,0,0,0	82,0,0,0,0 See also disputed sites list

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
		existing units have been replaced, this suggests that the 82 units forecast to be delivered in 2020/21 should be pushed back. Conclusion – question the Council’s projected timescales		
Little Ecclestone small sites				
Land to south of Cartford Inn, Cartford Lane, Little Ecclestone		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Larbreck House Farm, Well Lane, Little Ecclestone		No comment received from any party	2,0,0,0,0	2,0,0,0,0
Treales small sites				
Stanley Grange Farm, Moss Lane East, Treales		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land east and west of Primrose Farm, Kirkham Road, Treales		No comment received from any party	3,0,0,0,0	3,0,0,0,0
Foundry Yard, Kirkham Road, Treales		No comment received from any party	7,0,0,0,0	7,0,0,0,0
Land adjacent to White Hall, Kirkham Road, Treales		No comment received from any party	0,1,0,0,0	0,1,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Moss House Farm, Moss Lane East, Treales		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Land off Orchard Dene and North of Kirkham Road, Treales		No comment received from any party	0,3,0,0,0	0,3,0,0,0
Smithy Cottage, Kirkham Road, Treales		No comment received from any party	0,4,0,0,0	0,4,0,0,0
Moss Side small site				
Woodside Farm, Huck Lane, Moss Side		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Corka Bridge House, Corka Lane, Moss Side		No comment received from any party	0,1,0,0,0	0,1,0,0,0
Westby small sites				
Land adj Barncroft House, Fox Lane Ends, Westby		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Willows Farm, Ballam Road, Westby		No comment received from any party	2,0,0,0,0	2,0,0,0,0

Site	Response to email circular	Response to consultation on draft document	Initial delivery	Adjusted delivery
Wrea View, Weeton Road, Westby Mills		No comment received from any party	1,0,0,0,0	1,0,0,0,0
Salwick small sites				
Moss Farm (barn), Salwick Road, Salwick, Newton-with- Clifton		No comment received from any party	1,0,0,0,0	1,0,0,0,0

Table 2: General Comments on the Engagement Process

Representor Comment	Council Response
Emery Planning for Wainhomes	
<p>2.1 We maintain our objection to this APS being used to assess and potentially endorse the 5 year supply through a written procedure when the only forum for an oral assessment was the Local Plan Examination. However, that assessment was undertaken against the 2012 Framework which was materially different and less onerous for deliverability. As will establish the APS has proceeded on trying to establish a 5 year supply which is not in accordance with the tests in the Framework and PPG. Lead in times, delivery rates, the lack of any meaningful engagement and no clear evidence are key concerns as we now set out.</p>	<p>The PPG is clear in Paragraph: 011 Reference ID: 68-011-20190722 that <i>“Plans that have been recently adopted (as defined by footnote 38 of the Framework) can benefit from confirming their 5 year housing land supply through an annual position statement, including those adopted under the 2012 Framework.”</i> The respondent’s comment here therefore should really be directed at MHCLG, rather than the Council as part of its engagement process.</p> <p>The Council recognises that the assessment is through the 2019 Framework definition of “deliverable”. Significant changes to the assessment of sites were made for the 2019 APS compared to previous housing land supply statements produced by the Council, and a significant number of sites removed from the supply in its initial draft. This approach has been maintained in this year’s Draft APS.</p>
<p>Lead-in times and delivery rates</p> <p>2.2 The APS is using an out of date methodology for lead-in times and delivery rates. Paragraphs 4.16 to 4.20 refer to the SHLAA Steering Group and a table of assumptions. Such a table is of its time and superseded by more recent guidance in the 2019 Framework. As will establish in later sections, the PPG is clear that LPA should contact the developer and landowner for each site rather than relying on an out of date methodology. It is important to note from the trajectory that with the exception of the Clifton House Farm site, there is currently no reference to any engagement with applicants or developers. This is a fundamental and in our view one that means the APS should not proceed.</p>	<p>The SHLAA steering group assumptions remains a valid starting point based on engagement with the development industry, as a means of indicating likely lead-in times and delivery rates on sites, particularly where no further engagement is forthcoming from developers. Information from developers was used to modify delivery at the Local Plan examination; further modifications have followed resulting from actual delivery on sites affecting the residual amount for delivery (although assumed rates have not themselves changed as a result of delivery: assumed rates have only been altered where the developer has indicated to do so); further modifications still from the Inspector’s consideration of the 2019 APS; and further modifications from engagement on this APS, through the initial email circular and through the consultation on the Draft APS, including consideration of the COVID-19 issue.</p> <p>The consultation which the respondent has answered is an opportunity for applicants and developers to provide updated information on expected delivery. However, an earlier consultation has been undertaken involving emails to developers of strategic sites (100 or more dwellings) as detailed in Section 2 of this Engagement Statement: the results from all of the responses is shown in Table 1. Only one response indicated a downward adjustment to delivery; two indicated that</p>

Representor Comment	Council Response
	<p>the rate was correct and one (The Pastures) showed an increase in delivery rate. These are indicated in the trajectory in Appendix 1 of the Draft APS.</p>
<p>Absence of Clear Evidence</p> <p>2.3 We have significant concerns that the documentation from developers, landowners and agents has not been provided as part of the consultation but it will be provided at a later date. As this consultation is the only opportunity for representors to make submissions on the Council’s evidence, it must be included in the draft APS, if not before, in order for other parties to interrogate the information. It is not meeting the tests of clear evidence for developer, landowner or agent notes or correspondence, simply to be provided to the Planning Inspector only. On that basis our assessment is not based on the full evidence that the Council has or that the Inspector will get if the APS is submitted. Our position is endorsed by the following commentary on the PPG.</p> <p>2.4 Paragraph: 048 Reference ID: 3-048-20180913 of the PPG asks “What information will annual reviews of 5 year land supply, including annual position statements, need to include?”. It then states:</p> <p style="padding-left: 40px;"><i>“Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include”</i></p> <p>2.5 In this case the assessment is not complete and even if there is evidence it is not publicly available.</p> <p>Seven criteria are then set out.</p> <ul style="list-style-type: none"> • for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates; • for small sites, details of their current planning status and record of completions and homes under construction by site; • for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear evidence that there will be 	<p>The Council is required to engage with developers and others who have an impact on site delivery, then provide evidence including the outcomes of that engagement in the final submission. The approach taken is the same as for the 2019 APS, to which the representor made largely the same submission, which was not accepted by the Inspector.</p> <p>The delivery notes within Appendix 1 of the Draft APS provide evidence. It is not considered necessary for the Council to corroborate every assertion with decision notices, planning committee minutes or documents which are publicly available through the online planning application file, on the basis that the Council would be misrepresenting the true position if these were not provided. Responses to the consultation and pre-consultation are provided with this engagement statement, as required by PPG. The notes provided in Appendix 1 have been available for the respondent to comment upon, as he has.</p>

Representor Comment	Council Response
<p>housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;</p> <ul style="list-style-type: none"> • permissions granted for windfall development by year and how this compares with the windfall allowance; • details of demolitions and planned demolitions which will have an impact on net completions; • total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and • the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply. 	
<p>2.6 The information in Appendix 1 is limited ... With the information not being made publicly available in any format these statements can have no weight as all we see is the LPA's summary. The consultation enables us to make our own investigations but our final say on this process is on a half-finished draft APS where the LPA can then produce new information to either rebut our evidence and provide new evidence which we cannot comment on. The draft APS consulted on should be the final version.</p>	<p>The information in Appendix 1 of the Draft APS was made publicly available as part of the consultation to which the respondent has provided his representation.</p> <p>The engagement process involves consultation. The respondent advocates what would be a never-ending circle of consultation and response. If the draft APS to be consulted on were the final version, no account could be taken by the Council of the responses. The Council has engaged with developers through the pre-consultation emails, then again through the consultation on the Draft APS; then has made amendments in light of the engagement undertaken. This is in accordance with the PPG's requirements. The respondent made a similar comment in response to the 2019 Draft APS, which was not accepted by the Inspector.</p>
<p>2.7 Paragraph: 050 Reference ID: 3-050-20180913 asks "How is 5 year land supply confirmed through an annual position statement?" Guidance is then set out in 3 paragraphs. We break down these paragraphs in order to assess how the APS has been prepared.</p> <p><i>Where a local planning authority subsequently wishes to confirm their 5 year land supply position through an annual position statement, they will need to advise the Planning Inspectorate of their intention to do so by 1 April each year.</i></p> <p>2.8 We note that the LPA did inform PINS of their intention.</p>	<p>Comment noted</p>

Representor Comment	Council Response
<p><i>To ensure the robustness of the assessment of the deliverability of sites, the local planning authority should carry out an engagement process to inform the preparation of the annual position statement.</i></p> <p>2.9 We have a fundamental objection to the APS and the procedure the LPA has carried out. Whilst we understand contact has been made to landowners and developers on some sites in the supply, the actual clear evidence required by the PPG is not provided. Wainhomes has no record of an approach on Cropper Road West, therefore as a minimum all correspondence should be provided, so representors can at least see what has been provided to the Council as it prepared its APS. To have no Engagement Statement, even in draft to this point, is a significant lack of openness and transparency.</p>	<p>Wainhomes were approached in relation to Cropper Road West, and the email sent to Iain Fowler can be seen in Annex 1 to this Engagement Statement. No automatic out-of-office response was received, and therefore the developer has chosen not to respond and engage. Having failed to provide the information that the engagement process stipulated by PPG specifically seeks, this representation then complains about the unfairness of the process and provides 116 pages of challenge. With the exception of the sections of the representation concerning the process the content of the representation which makes comments on challenges to delivery rates on sites and overall methodology, demonstrates by its existence that Wainhomes and Gladman Developments have had and have taken the opportunity to engage with the process fully.</p> <p>The results of the engagement cannot be known until it has been completed. The consultation on the Draft APS is a major part of that engagement. PPG specifically states that the Engagement Statement should set out the outcomes of the engagement process, for submission to the Planning Inspectorate.</p>
<p>Paragraphs 4.24 and 4.27 of the APS state:</p> <p><i>“4.24 Site promoters are invited to provide updated information on their likely commencement of delivery/ delivery rates going forward.</i></p> <p><i>4.25 It is recognised that there is a degree of uncertainty as to the impact of the COVID-19 lockdown period. The majority of development sites shut for a twomonth period, which on a pro-rata basis would be equivalent to one-sixth of a year’s delivery. On a site delivering the standard assumption rate of 30 dwellings per annum, this would amount to 5 dwellings, and would give delivery of 25 rather than 30 dwellings in the current year, with the 5 dwellings added to the end of the period of delivery. However, in terms of impact on the supply over 5 years, a number of sites will end during the five-year period and therefore delivery on those sites within the five years would not be affected. On other sites, commercial imperatives may encourage developers to make up for lost delivery over a period, which is unlikely to exceed five years. There is some concern over the economic impact of COVID-19 on the overall housing market, but it is much too early to make any assessment and it cannot be justified to make a revision to housing delivery via a blanket approach on the basis of macro-economic outlook and its impact on overall housing demand at</i></p>	<p>The Draft APS consultation is part of the engagement process. It would be totally inappropriate to consult on the Draft APS and then not consider the responses, and incorporate information where appropriate. The Council has incorporated changes proposed by this respondent, notwithstanding that they do not relate directly to the site whose developer he represents; under the representor’s proposed arrangement, the Council would have been unable to do this. The representor would seem to advocate a process where consideration of the results of engagement are undertaken solely by the Planning Inspectorate.</p>

Representor Comment	Council Response
<p><i>this stage. It should be noted that at the base date 1st April 2020, one week into the lockdown, no rational analysis of the position was possible.</i></p> <p><i>4.26 Therefore, individual site developers are invited to comment on the extent to which the existing delivery rates on their sites are likely to be impacted, if at all. Where information in this regard has already been provided it has been incorporated into the trajectories in Appendices 1 and 2."</i></p> <p><i>4.27 The PPG requires that commentary is provided indicating reasons why a site has either exceeded or not progressed as expected. Comments are provided in this edition on the basis of known information, including information provided on request from developers/landowners and their agents. Any further information provided by site owners/developers in response to the consultation on this draft Annual Position Statement will be considered for incorporation into the final version of this statement for submission to the Planning Inspectorate". (our emphasis)</i></p> <p>2.11 We have highlighted certain parts of the above paragraphs which emphasise that this consultation is on a half-finished draft APS where the LPA can then produce new information to either rebut our evidence and provide new evidence which we cannot comment on. The draft APS consulted on should be the final version.</p>	
<p>2.12 As an interested party with sites in the supply and sites without consent, the engagement has been minimal as:</p> <ul style="list-style-type: none"> • We were not notified by letter or email but came across it on the LPA website; • We are given a 3 week period. Potential representors may well miss the opportunity to comment particularly if developers and landowners have not been contacted on their specific site. Wyre Council has published their draft APS for 4 weeks. We consider a minimum of 6 weeks is necessary; and, • Have Parish Council's and local residents been notified? 	<p>Emery Planning are held on the Planning Policy database but were wrongly attached to a category that were not sent this consultation. This only became apparent once their response was received, on the deadline day. No earlier notification was received of the issue despite the respondent clearly having taken considerable time to compose a long response. The problem with this consultee is an isolated case, and as stated in section 2, all agents representing developers and landowners were circulated. However, Wainhomes had previously been contacted directly by email at the earlier stage but had chosen not to reply, and therefore the Council had attempted to engage.</p> <p>In the context of the restricted time available within the period 1st April to 31st July, to accurately record completions and up-to-date information regarding planning permissions, incorporate this into the trajectories, undertake a pre-consultation and produce the draft document, with staff working from home during lockdown resulting in intermittent failures of technology and lost working time, the provision</p>

Representor Comment	Council Response
	<p>of three weeks to respond to the consultation is considered reasonable and proportionate. The consultation is non-statutory, and a full consultation on the document is not prescribed at all by PPG; therefore the time given over two rounds of engagement is considered ample. The extent of the respondent's comments bears this out.</p>
<p>2.13 We only have the benefit of the LPAs short summary in the final column of Appendix 1 of the APS. Therefore we are not able to assess or interrogate the information provided by agents, landowners and developers to test their conclusions. It is important to note from the trajectory that with the exception of the Clifton House Farm site, there is currently no reference to any engagement with any other applicant or developer.</p>	<p>The Council considers that the engagement has been generous. The stakeholders have been contacted and asked specifically to indicate the likely delivery on their own sites. Further to this, a public consultation on a draft APS has been undertaken, with views sought directly from a wide group of stakeholders set out in this statement. Site owners have therefore had both:</p> <ul style="list-style-type: none"> • the opportunity to set out their likely delivery at the outset; and • the opportunity to scrutinise the site delivery on all other sites in the supply and to provide their own evidence as to what they consider to be the likely delivery on those sites.
<p>2.14 The LPA states that this information, along with any updated responses will be provided to the Planning Inspectorate. This means that we will not have the opportunity to comment on the information to date or that to be provided, and on that basis there is a simple but crucial unfairness point to the process. That simply cannot be right or fair on such an important topic.</p>	<p>The clear evidence is required for submission to the Planning Inspectorate. Some of this evidence derives directly from the engagement process. The engagement process is an opportunity for stakeholders such as Wainhomes and Gladman Developments, to put forward their views on the likely delivery on sites within the supply. The Planning Inspectorate will make a judgement on whether the evidence is sufficient.</p>
<p><i>The local planning authority can then submit their annual position statement to the Planning Inspectorate for review by 31 July of the same year.</i></p> <p>2.15 We assume that the LPA will meet this deadline, although due to our concerns on the procedural aspect we question whether a submission should be made.</p>	

Representor Comment	Council Response
<p><i>When assessing an annual position statement, the Planning Inspectorate will carry out a 2 stage assessment.</i></p> <p><i>First, they will consider whether the correct process has been followed (i.e. whether a 5 year supply has been confirmed initially through an up to date plan and whether satisfactory stakeholder engagement has been carried out).</i></p> <p>2.16 For the reasons set out above, satisfactory stakeholder engagement has not been carried out and we have not been provided with the required clear evidence in order to comment on. Whilst our submissions later set out our view on sites, this has been done without the benefit of the information the Council has and will receive during the consultation process and it puts any party seeking to challenge the APS at a significant disadvantage.</p>	<p>The Council does not accept this. The respondent seeks a never-ending circle of consultation and response. The consultation is an invitation to provide evidence; the respondent's principal apparent interest is in the evidence of others, rather than the provision of evidence relating to the developer's own sites.</p>
<p><i>The Planning Inspector's assessment will be made on the basis of the written material provided by the authority and the Planning Inspector will not refer back to the local planning authority or any other stakeholders to seek further information or to enter into dialogue about sites.</i></p> <p>2.18 This goes precisely to our objection on the procedure as all parties must have the information that is to be provided to the Inspector. If not, then the Inspector's decision is taken on all the evidence yet representors and stakeholders are only provided with part of the picture. As this consultation is the only opportunity we have, all evidence must be provided now for review and comment. If not then the process is both opaque and unfair.</p>	<p>The Council is required to engage with developers and others who have an impact on site delivery, then provide evidence including the outcomes of that engagement in the final submission.</p>
<p>2.19 If housing land supply is a matter for a Section 78 appeal, it is usually dealt with by either a hearing or inquiry.</p> <p>2.20 We note that Criterion K of the PINS Procedural Guidance for Appeals states:</p> <p><i>"Hearing - a hearing would be appropriate if:</i></p> <ul style="list-style-type: none"> ▪ <i>the Inspector is likely to need to test the evidence by questioning or to clarify matters¹³; or</i> ▪ <i>the status or personal circumstances of the appellant are at issue¹⁴; or</i> 	

Representor Comment	Council Response
<ul style="list-style-type: none"> ▪ <i>there is no need for evidence to be tested through formal questioning by an advocate or given on oath; or</i> ▪ <i>the case has generated a level of local interest such as to warrant a hearing¹⁵; or</i> ▪ <i>it can reasonably be expected that the parties will be able to present their own cases (supported by professional witnesses if required) without the need for an advocate to represent them; or</i> ▪ <i>in an enforcement appeal, the grounds of appeal, the alleged breach, and the requirements of the notice, are relatively straightforward.</i> 	
<p>2.21 Footnote 13 states:</p> <p style="padding-left: 40px;"><i>“13 For example where detailed evidence on housing land supply needs to be tested by questioning.”</i></p> <p>2.22 Whilst we note the process for an APS, we do want to raise our concern when we have no further opportunity to comment on the APS and any additional information provided.</p>	<p>Repeats the respondent’s comment above</p>
<p style="padding-left: 40px;"><i>It is therefore important that the authority has carried out a robust stakeholder engagement process and that adequate information is provided about disputed sites.</i></p> <p>2.23 At this stage there is no clarity on what the disputed sites are and it will only be when the consultation closes that the LPA will know which sites are disputed. However we cannot give our full position on which sites we dispute and do not dispute if the information is not provided. Section 10 is based on the information provided to date and from what we have obtained. The LPA should have published a draft APS and then consulted upon it, including a meeting with all stakeholders before the draft APS is formally published for consultation prior to submission to PINS.</p>	<p>The Council has produced a draft APS and consulted on it. PPG requires the Council to consider the outcomes of this engagement. Sites remaining in dispute are for the PINS Inspector to recommend upon.</p> <p>These arguments were made by the same representor in relation to the 2019 APS and were not accepted by the Inspector.</p>

Representor Comment	Council Response
<p>2.24 Paragraph: 051 Reference ID: 3-051-20180913 of the PPG asks “What engagement should the authority undertake to prepare an annual position statement?” We assess each below.</p> <ul style="list-style-type: none"> • <i>All local planning authorities will need to engage with stakeholders who have an impact on the delivery of sites. The aim is to provide robust challenge and ultimately seek as much agreement as possible, so that the authority can reach a reasoned conclusion on the potential delivery on sites which contribute to the 5 year land supply. Those authorities who are seeking to demonstrate a confirmed 5 year land supply will need to produce an engagement statement and submit this to the Planning Inspectorate, including:</i> <ul style="list-style-type: none"> ▪ <i>an overview of the process of engagement with site owners/applicants, developers and other stakeholders and a schedule of site based data resulting from this;</i> ▪ <i>specific identification of any disputed sites where consensus on likely delivery has not been reached, including sufficient evidence in support of and opposition to the disputed site(s) to allow a Planning Inspector to reach a reasoned conclusion; as well as an indication of the impact of any disputed sites on the number of years of supply;</i> ▪ <i>the conclusions which have been reached on each site by the local planning authority in consideration of the outcome of stakeholder engagement;</i> ▪ <i>the conclusions which have been reached about the overall 5 year land supply position.</i> 	<p>Repeats the PPG</p>
<p>2.25 There has been no engagement with the APS until its publication and on the information provided parties have not been able to “provide robust challenge” or even discuss agreement with the LPA. The above process has simply not been followed and the absence of even a draft Appendix 3 (Engagement Statement) of what has been done to date further demonstrates that the process has not been followed.</p>	<p>Incorrect. Developers were contacted and Wainhomes chose not to reply. The consultation draft provided a further opportunity which this representation takes up. The PPG (Paragraph: 015 Reference ID: 68-015-20190722) indicates that an Engagement Statement should be produced and submitted to PINS:</p> <p><i>Those authorities who are seeking to confirm a 5 year housing land supply through an annual position statement can produce an engagement statement and submit this to the Planning Inspectorate, including:</i></p>

Representor Comment	Council Response
	<ul style="list-style-type: none"> • <i>an overview of the process of engagement with site owners / applicants, developers and other stakeholders and a schedule of site-based data resulting from this;</i> • <i>specific identification of any disputed sites where consensus on likely delivery has not been reached, including sufficient evidence in support of and opposition to the disputed site(s) to allow a Planning Inspector to reach a reasoned conclusion; as well as an indication of the impact of any disputed sites on the number of years of supply;</i> • <i>the conclusions which have been reached on each site by the local planning authority in the light of stakeholder engagement;</i> • <i>the conclusions which have been reached about the overall 5 year housing land supply position.</i> <p>i.e. after the engagement process has been completed.</p>
<p><i>Provided the correct process has been followed and sufficient information has been provided about any disputed sites, the Planning Inspectorate will issue their recommendation in October of the same year, confirming, if appropriate, the housing land supply until the following October.</i></p> <p>2.26 Noted.</p> <p>2.27 It is clear the LPA has not followed procedure and the APS should be withdrawn.</p>	<p>The Council disagrees.</p>
Gladman Developments	
<p>Engagement and Consultation</p> <p>As advised in the Framework and PPG, engagement with stakeholders is key to ensuring that a Council’s Annual Position Statement provides a true and robust representation of an authority’s deliverable housing land supply for the following 12-month period.</p> <p>However, as currently prepared we are concerned that this key element of the APS process has not been met in the case of Fylde. Other than the delivery notes that</p>	<p>Developers were contacted as set out in Annex 1. Where information was provided it was incorporated. The consultation on the draft APS provided a further opportunity for developers to provide information, which was specifically requested in the consultation letter and email (Annex 3).</p>

Representor Comment	Council Response
<p>have been provided for certain sites in the Council’s Draft Five-Year Housing Trajectory (Draft 2020 APS Appendix 1), there is no evidence to support the Council’s assumptions, or that it has sought to engage with site promoters or house builders to check their delivery intentions.</p>	
<p>Not only does this undermine the credibility of the Council’s assessment by failing to provide the ‘clear evidence’ that is required by the Framework and PPG to justify the inclusion of some sites in the authority’s deliverable supply, but it prevents any proper scrutiny of the Council’s claimed land supply position. It is considered that this is particularly critical when preparing an APS document, given their intended lifespan and the limited opportunities that will be provided to test site delivery information again (e.g. through a S78 Public Inquiry).</p>	<p>The Council disagrees. The respondent is free to provide any evidence he has.</p>
<p>We further question whether the period for inviting comments on the draft 2020 APS (approximately three weeks) has provided sufficient opportunity to make representations on the document. As a potentially important material consideration in the determination of planning applications, we would have expected consultation to last for a period of at least six-weeks, as per standard statutory timescales for the preparation of planning policy documents.</p> <p>The Framework and PPG make clear that one of the purposes of engagement when preparing an APS is to provide robust challenge on site delivery assumptions. Without any site delivery evidence or correspondence from site promoters of [<i>sic.</i>] developers at this stage, we contend that this part of the APS process has not been [<i>sic.</i>] satisfactorily addressed.</p>	<p>In the context of the restricted time available within the period 1st April to 31st July, to accurately record completions and up-to-date information regarding planning permissions, incorporate this into the trajectories, undertake a pre-consultation and produce the draft document, with staff working from home during lockdown resulting in intermittent failures of technology and lost working time, the provision of three weeks to respond to the consultation is considered reasonable and proportionate. The consultation is non-statutory, and a full consultation on the document is not prescribed at all by PPG; therefore the time given over two rounds of engagement is considered ample. The extent of the respondent’s comments bears this out.</p> <p>Evidence is provided in Appendix 1 of the Draft APS. Evidence on previous site delivery is clearly set out year-by-year in the table in Appendix 1. Specific factual information is provided. Further information resulting from the consultation on the draft document has been added to the submission version, and in this Engagement Statement. The respondent has been free to challenge delivery rates on sites, and has done so.</p>

Table 3: General Comments on Deliverability of Sites

Representor comment	Council response
Barton Willmore for Tom Rowe	
<p>We write on behalf of our Client, Mr Tom Rowe, in response to the Five Year Housing Land Supply Draft Annual Position Statement ('APS') published for consultation by Fylde Council ('the Council') in June 2020.</p> <p>The APS seeks to confirm the Council's five year housing land supply position at the base date 1st April 2020. It follows the adoption of the 2019 APS which concludes that the Council has a five year housing land supply for the purpose of decision-taking until 31st October 2020.</p> <p>The Council is welcoming comments from stakeholders and interested parties on the proposed methodology and assumptions (including lead-in times and build-out rates) set out in the Draft APS and the assessment of likely delivery of individual sites. The Council will then review the responses and update their APS before submitting it to the Secretary of State for his consideration.</p> <p>Our Client owns two sites identified as part of the land supply set out in the trajectory at Appendix 1 of the Draft APS. This includes Land north of Mill Lane, Elswick (reference HS72 and HLAS reference 4A1140) and Land north of Beech Road, Elswick (reference HS73 and HLAS reference 4A1141). An extract from the adopted Fylde Local Plan Proposals Map showing the location of each site is enclosed with this letter.</p> <p>From the outset, our Client supports the Council's proactive approach to progressing the APS. The purpose of these representations is to confirm the deliverability of the sites within the control of our Client. We do not intend to critique the methodology and assumptions set out in the APS as part of our representations.</p> <p>The following section sets out the planning policy context for assessing the deliverability of sites.</p> <p>Planning Policy Context</p> <p>The revised National Planning Policy Framework (NPPF) was published by the government in June 2019. It sets out the planning policies for England and how they are expected to be applied.</p>	<p>Response noted. The Council welcomes the respondent's support for the APS process and engagement in establishing the deliverability of sites.</p>

Representor comment	Council response
<p>Section 5 sets the framework for delivering a sufficient supply of homes.</p> <p>Paragraph 73 of the NPPF requires local planning authorities to identify and update annual a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer of 5%, 10% or 20% depending on the local planning authority's circumstances.</p> <p>The glossary at Appendix 2 of the NPPF defines 'deliverable' as follows: [quotes definition of deliverable in full]</p> <p>The NPPF is supported by the National Planning Practice Guidance (NPPG). The 'housing supply and delivery' chapter sets out guidance on the provision on five year housing land supply and the housing delivery test. Paragraph 007 reiterates the definition of deliverable set out at Annex 2 of the NPPF. For major sites with outline planning permission it states robust evidence must be provided to demonstrate deliverability. Such evidence to demonstrate deliverability may include:</p> <ul style="list-style-type: none"> • Current planning status – How much progress has been made towards approving reserved matters. • Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and developer which confirms the developer's delivery intentions and anticipated start and build-out rates. • Firm progress with site assessment work. • Clear relevant information about site viability, ownership constraints or infrastructure provision. <p>The following sections of our representations set out how our Client's land interests in Elswick meet the definition of deliverable set out in the NPPF and NPPG and should, therefore, be included as part of the Council's five year housing land supply in accordance with paragraph 73 of the NPPF.</p> <p>[Section follows on the two sites, see Table 1]</p> <p>Conclusions</p>	

Representor comment	Council response
<p>We welcome the opportunity to comment on the Five Year Housing Land Supply Draft APS and to provide an update on our Clients land interest at Mill Lane and Beech Road in Elswick.</p> <p>In summary, we have demonstrated that both sites meet the definition of 'deliverable' set out within the NPPF and NPPG and should, therefore, be included as part of the Council's five year housing land supply.</p> <p>We trust you will take these comments into consideration, and we would welcome the opportunity to engage further with the Council on these matters.</p>	
Emery Planning for Wainhomes	
<p>1.3 The Council's deliverable supply is claimed to be 2,991 dwellings. This equates to 6.01 years applying Liverpool and the 10% buffer. We conclude the LPA is wrong on how they have calculated the shortfall at the base date and based on Policy H1 it should be 2,331 dwellings. With the 10% buffer the 5 year requirement is 2,564 dwellings, which equates to 513 dwellings per annum. This would reduce the supply to 5.83 years.</p> <p>1.4 The above figures assume that all the sites in the supply are deliverable. However, we have undertaken a detailed assessment of the supply to establish what we consider to be the true supply. We calculate the deliverable supply to be 2,074 which equates to a supply of 4.05 years.</p>	<p>The Council disagrees with both of these conclusions. The Council responds to the detailed arguments below.</p>
<p>2. The Methodology</p> <p>2.1 We maintain our objection to this APS being used to assess and potentially endorse the 5 year supply through a written procedure when the only forum for an oral assessment was the Local Plan Examination. However, that assessment was undertaken against the 2012 Framework which was materially different and less onerous for deliverability. As will establish the APS has proceeded on trying to establish a 5 year supply which is not in accordance with the tests in the Framework and PPG. Lead in times, delivery rates, the lack of any meaningful engagement and no clear evidence are key concerns as we now set out.</p>	<p>The changes to the test for deliverability have been acknowledged by the Council and acted on in terms of the sites included and the general approach taken. This issue was fresher when preparing the 2019 APS, and substantial changes were made to the Council's approach in advance of the preparation of that document. This has continued to the current year. The respondent makes an objection to the procedure set out in PPG, which it is not for the Council to respond to.</p> <p>(Comments regarding engagement are addressed in Table 2).</p>

Representor comment	Council response
<p>Lead-in times and delivery rates</p> <p>2.2 The APS is using an out of date methodology for lead-in times and delivery rates. Paragraphs 4.16 to 4.20 refer to the SHLAA Steering Group and a table of assumptions. Such a table is of its time and superseded by more recent guidance in the 2019 Framework. As will establish in later sections, the PPG is clear that LPA should contact the developer and landowner for each site rather than relying on an out of date methodology. It is important to note from the trajectory that with the exception of the Clifton House Farm site, there is currently no reference to any engagement with applicants or developers. This is a fundamental and in our view one that means the APS should not proceed.</p>	<p>The Council has requested up-to-date information of all relevant developers, directly by email. Where such information is not forthcoming, the delivery rates established through firstly last year’s APS, secondly the adopted Local Plan, thirdly the delivery assumptions brought forward through the SHLAA steering group. Therefore delivery rates have been updated, wherever developers have been prepared to engage and provide them.</p>
<p>Absence of Clear Evidence</p> <p>2.3 We have significant concerns that the documentation from developers, landowners and agents has not been provided as part of the consultation but it will be provided at a later date. As this consultation is the only opportunity for representors to make submissions on the Council’s evidence, it must be included in the draft APS, if not before, in order for other parties to interrogate the information. It is not meeting the tests of clear evidence for developer, landowner or agent notes or correspondence, simply to be provided to the Planning Inspector only. On that basis our assessment is not based on the full evidence that the Council has or that the Inspector will get if the APS is submitted. Our position is endorsed by the following commentary on the PPG.</p> <p>2.4 Paragraph: 048 Reference ID: 3-048-20180913 of the PPG asks “What information will annual reviews of 5 year land supply, including annual position statements, need to include?”. It then states:</p> <p style="padding-left: 40px;"><i>“Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include”</i></p> <p>2.5 In this case the assessment is not complete and even if there is evidence it is not publicly available.</p> <p>Seven criteria are then set out.</p>	<p>Comments regarding engagement in this paragraph are addressed in Table 2.</p> <p>The assessment is set out within the table, providing site-based data, planning application references, planning status and supplementary notes where appropriate. The assessment in the consultation draft is incomplete insofar as the outcomes of</p>

Representor comment	Council response
<ul style="list-style-type: none"> • for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates; • for small sites, details of their current planning status and record of completions and homes under construction by site; • for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission; • permissions granted for windfall development by year and how this compares with the windfall allowance; • details of demolitions and planned demolitions which will have an impact on net completions; • total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and • the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply. 	<p>engagement are an important source of further information, where consultees have chosen to provide it. Any further evidence gained through the consultation has been used to supplement that provided initially.</p>
<p>2.6 The information in Appendix 1 is limited and simply cannot be considered to meet the PPG. One or two lines on each site is simply not going to comply.</p>	<p>The level of information provided depends on the status of the site. In many cases, the planning status of the site alone is sufficient to demonstrate deliverability. In others, more detail is provided through the factual position on the site. It is the nature of the information, rather than the length of prose, that determines its usefulness. The Inspector will decide on a site-by-site basis where the delivery is disputed.</p>
<p><i>Second, they will look at whether the evidence is sufficient to demonstrate a 5 year supply of deliverable housing sites, with an appropriate buffer, at the base date of the assessment (i.e. 1 April in the relevant year).</i></p>	

Representor comment	Council response
<p>2.17 Our submissions on this point are in Section 10 of this Statement.</p>	<p>The representor’s section 10 gives site-by-site comments which are set out in Table 1 and, where applicable, in the disputed sites list in Table 6, along with the Council’s response.</p>
<p>9. Stage 6: Identifying a Realistic and Deliverable Supply</p> <p>What constitutes a deliverable site?</p> <p>Previous National Planning Policy (2012) and Guidance (2014)</p> <p>9.1 Footnote 11 of the 2012 Framework stated:</p> <p><i>“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”</i></p>	<p>The Council has no comment on this paragraph</p>
<p>9.2 Paragraph 3-031 of the previous PPG (dated 6th March 2014): “What constitutes a ‘deliverable site’ in the context of housing policy?” stated:</p> <p><i>“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.</i></p> <p><i>However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the 5-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5-year timeframe.</i></p>	<p>The Council has no comment on this paragraph</p>

Representor comment	Council response
<p><i>The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply.</i></p>	
<p>9.3 Therefore, under the 2012 Framework, all sites with planning permission, regardless of their size or whether the planning permission was in outline or in full were to be considered deliverable until permission expired unless there was clear evidence that schemes would not be “implemented” within five years. The PPG went further by stating that allocated sites “could” be deliverable and even non-allocated sites without planning permission “can” be considered capable of being delivered.</p>	<p>The Council has no comment on this paragraph</p>
<p>Draft revised National Planning Policy Framework (March to May 2018)</p> <p>9.4 The Government consulted on the draft revised Framework between March and May 2018. The draft revised Framework provided the following definition of “deliverable” in the glossary:</p> <p><i>“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”</i></p> <p>9.5 Question 43 of the Government’s consultation on the draft revised NPPF asked: “do you have any comments on the glossary?”</p>	<p>The Council has no comment on these paragraphs</p>

Representor comment	Council response
<p>9.6 Under the title: “What constitutes a ‘deliverable site’ in the context of housing policy?”, the draft Planning Practice Guidance (March 2018, page 16) simply included the same definition as that set out in the draft revised NPPF above.</p>	
<p>Government’s response to the draft revised Framework consultation</p> <p>9.7 There were 750 responses to question 43 of the consultation. Some of the points raised included:</p> <p><i>“Local authorities called for the proposed definition of ‘deliverable’ to be reconsidered, as it may result in them being unable to prove a five year land supply and place additional burdens on local authorities to produce evidence. Private sector organisations were supportive of the proposed definition.” (our emphasis)</i></p> <p>9.8 The government’s response was as follows:</p> <p><i>“The Government has considered whether the definition of ‘deliverable’ should be amended further, but having assessed the responses it has not made additional changes. This is because the wording proposed in the consultation is considered to set appropriate and realistic expectations for when sites of different types are likely to come forward.” (our emphasis)</i></p>	<p>The Council has no comment on these paragraphs</p>
<p>Revised Framework (July 2018)</p> <p>9.9 The revised Framework was published on 24th July 2018. The definition of deliverable was provided on page 66 of the 2018 Framework and was as follows:</p> <p><i>“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or</i></p>	<p>The Council has no comment on this paragraph</p>

Representor comment	Council response
<p><i>identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</i> (our emphasis)</p>	
<p>9.10 Consequently, the 2018 Framework stated that sites with outline planning permission or allocated sites should “only” be considered deliverable where there is “clear evidence” that housing completions will “begin” on site within five years. The onus is on the Council to provide the clear evidence for any sites with outline planning permission and allocated sites it considers deliverable.</p> <p>9.11 The “clear evidence” required is not described any further in the Framework. However, it is discussed in the updated PPG, which we discuss below.</p>	<p>The Council has no comment on these paragraphs</p>
<p>9.12 Between 26th October and 7th December 2018, the Government consulted on:</p> <ul style="list-style-type: none"> • Changes to planning practice guidance relating to the standard method for assessing local housing need; and • Policy clarifications relating to housing land supply, the definition of deliverable and appropriate assessment. <p>9.13 In terms of the definition of deliverable, the consultation document stated at paragraph 36:</p> <p><i>“The new Framework published in July this year set out a revised definition of ‘deliverable’ (contained in the glossary at Annex 2 of the Framework). Early experience of applying this definition has suggested that it would benefit from some clarification of the wording. In particular, the existing text could be clearer that sites that are not major development, and which have only an outline planning consent, are in principle considered to be deliverable. The relationship between the first sentence of the definition (which sets out general considerations in terms of deliverability), and the remainder that explains how particular circumstances should be approached, also needs to be clear. The specific circumstances cited in the definition are intended to indicate how the general considerations in the first</i></p>	<p>The Council has no comment on these paragraphs</p>

Representor comment	Council response
<p><i>sentence apply to the types of development referred to in the text that follows.</i></p> <p>9.14 The consultation document then set out a proposed revised definition as follows:</p> <p><i>“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:</i></p> <p><i>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i></p> <p><i>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”(our emphasis)</i></p> <p>9.15 Question 5 of the consultation asked: <i>“Do you agree with the proposed clarification to the glossary definition of “deliverable”?”</i></p>	
<p>Government’s response to the technical consultation</p> <p>9.16 The Government’s response to the consultation was published on 19th February 2019. It explained that there were 461 responses to question 5 and the points raised included:</p> <p><i>“• There was considerable support (68%) for the proposal from the private sector, although some concerns were raised that sites will need longer than five years to be built out.</i></p> <p><i>• About half (54%) of local authorities agreed with the proposal, although some felt that it may make delivery harder to demonstrate, resulting in sites being removed</i></p>	<p>The Council has no comment on these paragraphs</p>

Representor comment	Council response
<p><i>from plans and therefore make it more difficult for authorities when demonstrating a five year land supply.</i></p> <p>• Many respondents across the groups suggested that sites with outline planning permission and / or sites that are included within local plans should be included in the definition of deliverable. Many respondents also suggested that the proposal would result in developers using specialist knowledge and resources to influence planning decisions in their favour, as well as complaints concerning land banking” (our emphasis)</p>	
<p>9.17 The Government’s response states:</p> <p><i>“The Government welcomes the views submitted on this proposal. Taking them into account, it considers that the revised definition does provide helpful clarification of the approach established already in the National Planning Policy Framework. The concerns that have been expressed relate more to this overall approach than the merits of the clarification (and the relevance of the overall approach was considered when the Framework was being finalised, following the consultation in the spring of 2018). The changes to the definition that the present consultation proposes should not make it harder for authorities to demonstrate that they have a deliverable portfolio of sites; indeed, it makes it clearer that non-major sites with outline consent should be considered deliverable unless there is evidence to the contrary. We are, however, providing further information on applying the approach through planning practice guidance.” (our emphasis).</i></p>	<p>The Council has no comment on this paragraph</p>
<p>Revised Framework (February 2019)</p> <p>9.18 The definition of “deliverable” is set out on page 66 of the 2019 Framework states:</p> <p><i>“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:</i></p> <p><i>a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until</i></p>	<p>The Council has no comment on these paragraphs</p>

Representor comment	Council response
<p><i>permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).</i></p> <p><i>b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.</i> (our emphasis)</p> <p>9.19 The “further information” on applying the approach of the revised definition of “deliverable” referred to in the Government’s response has now been set out in the PPG, which is discussed below.</p>	
<p>Updated Planning Practice Guidance (PPG, September 2018)</p> <p>9.20 The PPG was originally updated on 13th September 2018. Paragraph 3-036 of the PPG4 stated:</p> <p><i>“For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:</i></p> <ul style="list-style-type: none"> <i>• any progress being made towards the submission of an application;</i> <i>• any progress with site assessment work; and</i> <i>• any relevant information about site viability, ownership constraints or infrastructure provision.</i> <p><i>For example:</i></p> <ul style="list-style-type: none"> <i>• a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.</i> <i>• a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”</i> 	<p>The Council has no comment on this paragraph</p>

Representor comment	Council response
<p>Further Updated Planning Practice Guidance (PPG, July 2019)</p> <p>9.21 The PPG was more recently updated on 22nd July 2019. Paragraph 68-007 of the PPG5 provides some examples of the types of evidence, which could be provided to support the inclusion of sites with outline planning permission for major development and allocated sites without planning permission. It states:</p> <p><i>“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:</i></p> <ul style="list-style-type: none"> <i>• have outline planning permission for major development;</i> <i>• are allocated in a development plan;</i> <i>• have a grant of permission in principle; or</i> <i>• are identified on a brownfield register.</i> <p><i>Such evidence, to demonstrate deliverability, may include:</i></p> <ul style="list-style-type: none"> <i>• current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;</i> <i>• firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;</i> <i>• firm progress with site assessment work; or</i> <i>• clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.</i> 	<p>The respondent provides a long quote from the PPG and then asserts in a single line that the APS “fails on providing this information”. The information is provided on a site-by-site basis and therefore broad assertions as the respondent makes cannot be appropriate. Further, this section of PPG constitutes guidance as to the evidence that may be provided in support of sites: it specifically states “such evidence, to demonstrate deliverability, may include...” There is no compulsion on the Council to provide evidence in a particular form, and this paragraph of PPG simply provides some suggested types which could, if provided, amount to clear evidence. The respondent’s statement implies that all should be provided in every case.</p>

Representor comment	Council response
<p><i>Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.”</i></p> <p>9.22 The Fylde APS clearly fails on providing this information.</p>	
<p>Relevant Appeal Decisions</p> <p>9.23 The following appeal decisions are relevant as it sets out how the policy context has been assessed for decision making.</p> <p>Land to the south of Cox Green Road, Rudgwick, Surrey</p> <p>9.24 As part of its case in seeking to defend an appeal made by Parkes Ltd against its decision to refuse to grant outline planning permission for up to 53 dwellings at land to the south of Cox Green Road, Rudgwick, Waverley Council claimed it could demonstrate a supply of 5,708 dwellings, which equated to just under 5.2 years against its housing requirement and buffer.</p> <p>9.25 The Inspector concluded that the supply should be reduced by 928 dwellings and therefore that Waverley Council could only demonstrate a “deliverable” supply of 4.3 years. The reasons why the Inspector considered the supply should be reduced are set out in paragraphs 10 to 27 of the appeal decision. We note the following points which are highly material to the Fylde APS:</p> <ul style="list-style-type: none"> • Firstly, whilst Waverley Council’s assumptions of delivery on a site at Dunsfold Park relied on estimated numbers of delivery from pro-forma returned by the site’s lead developer, the Inspector considered that the details contained within it were “scant”. There was no explanation as to how the timings of delivery could be achieved including the intended timescales for submitting and approving reserved matters, applications of discharge of conditions, site preparation and installing infrastructure. • Secondly, 24 sites without full planning permission were removed for the reason set out in paragraphs 21 to 24. Paragraph 23 of the appeal decision states: <p><i>“To justify including sites of these types it would be necessary to produce clear and specific evidence, in sufficient detail, to show that the sites were available, suitable, and achievable, with a realistic prospect of delivery</i></p> 	<p>The appeal decision¹ (paragraph 12 onwards) notes that the site referred to by the representor at Dunsfold Park is a very large site for 2,600 dwellings, 1,800 with outline permission, of which the Council stated that as many as 463 units would be delivered in the five year period. Despite the concerns of the Inspector noted by the representor here, the inclusion of the reduced number of 232 units was accepted as part of the supply. The level of detail sought by the Inspector in respect of this site would seem to reflect the large number of dwellings the site was to contribute whilst only having outline consent. No site in Fylde reflects this position.</p> <p>Paragraph 22 of the Inspector’s decision indicates that the 24 sites referred to by the representor here as being “sites without full planning permission” were described by the Inspector thus: <i>“None of the other disputed sites has any planning permission”</i> which is a very different position from that which the representor is suggesting. The Inspector then proceeds to indicate a series of reasons why the sites should not be included which go far beyond an absence of evidence of deliverability. The group of</p>

¹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3227970>

Representor comment	Council response
<p><i>within the required timescale. I appreciate that this would be a large task, but self-evidently the size of that task is related to the number of sites without full planning permission that the Council seeks to rely on. On the evidence before me now, none of the sites in the second section of the schedule can currently justify being included in the 5-year supply.”(our emphasis)</i></p>	<p>sites included sites with no planning status even in evidence or emerging documents, SHLAA sites, sites in an emerging plan, sites in the AONB or green belt, sites that had been refused planning permission. The sites included by Fylde Council are not considered comparable with these considered by the appeal inspector, based on the information contained within the decision letter. The reference to this element of the appeal by the representor is inappropriate and creates a false impression of the sites included by Fylde Council in its Draft APS, by the use of the comparison.</p>
<p>Land off Popes Lane, Sturry, Kent</p> <p>9.26 As part of its case in seeking to defend an appeal against its decision to refuse to grant outline planning permission for up to 140 no. dwellings at land off Popes Lane, Sturry, Canterbury City Council claimed that it could demonstrate a 6.72 year supply. For there to be a shortfall in the supply, Canterbury Council claimed that some 1,654 dwellings (out of 6,455 dwellings) would need to be removed from the “deliverable” supply.</p> <p>9.27 The Inspector however found that the Council could not demonstrate a five year housing land supply. The Inspector concluded that the deliverable supply was 4,644 dwellings, which equates to 4.8 years. The reason why the Inspector concluded that the deliverable supply was 1,811 dwellings (28%) less than the Council claimed was because he found that 10 sites should be removed from the supply because:</p> <p><i>“there is insufficient clear evidence to show that they meet the NPPF’s definition of deliverable. Sites which are not deliverable cannot be counted as part of the supply for the purposes of meeting the 5-year requirement.”</i> (paragraph 23)</p> <p>9.28 In this case, Canterbury Council had provided statements of common ground between the Council and the developer or landowner to support the inclusion of several of the disputed sites. No such statements are provided as part of the Fylde APS. The Inspector found that the statements of common ground did not demonstrate that the development prospect was realistic. Paragraph 23 of the appeal decision states:</p>	<p>The Inspector for this appeal² noted that sites with only outline permission or without any planning permission at all amounted to 3,923 dwellings, representing 60% of the claimed supply. Of these, the Inspector retained more than half within the supply. The picture painted of sites <i>en masse</i> being removed from the supply gives an incomplete picture, and conveys the impression that such sites should automatically be removed, which is incorrect.</p> <p>The positions are not comparable. In the case of Fylde, rather than provide documents setting out the aspirations of developers or landowners, the Council has set out the position of deliverability based on actual progress made with applications. The value of any information provided is its content. The representor appears to</p>

² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3216104>

Representor comment	Council response
<p><i>“For a number of the disputed sites, the Council’s evidence is founded on sitespecific SCGs which have been agreed with the developer or landowner of the site in question. I appreciate that the PPG refers to SCGs as an admissible type of evidence, and I have had full regard to that advice. But nevertheless, the evidential value of any particular SCG in this context is dependent on its content. In a number of cases, the SCGs produced by the Council primarily record the developer’s or landowner’s stated intentions. Without any further detail, as to the means by which infrastructure requirements or other likely obstacles are to be overcome, and the timescales involved, this type of SCG does not seem to me to demonstrate that the development prospect is realistic. In addition, most of the site-specific SCGs are undated, thus leaving some uncertainty as to whether they represent the most up-to-date position.”(our emphasis)</i></p> <p>9.29 This is crucial as all we have as part of the Fylde APS is a very simple position with no letters or evidence as to why sites are deliverable.</p>	<p>conflate evidence with pieces of paper to brandish in the fashion of Mr Chamberlain, rather than the provision of useful information.</p>
<p>Land east of Gleneagles Way, Hatfield Peverel, Braintree</p> <p>9.30 The Secretary of State called-in for his own determination David Wilson Homes’ application to Braintree District Council for up to 120 dwellings at land east of Gleneagles Way, Hatfield Peverel. An inquiry was held in December 2017 and January 2018 and the Inspector issued his report on 20th March 2018 i.e. before the 2018 Framework was published. Over a year after the Inspector had issued his report, on 11th April 2019, Braintree District Council published new information in relation to housing land supply. This was an addendum to Braintree’s housing land supply position paper, which included the evidence the Council relied on to support the inclusion of sites with outline planning permission for major development and allocated sites without planning permission in its supply.</p> <p>9.31 Braintree District Council claimed that it could demonstrate a 5.29 year supply. In determining the appeal, the Secretary of State concluded that the Council could</p>	<p>This call-in decision⁶ and the three others noted in the representors paragraph 9.33 contain identical conclusions from the SoS. The representor notes that 10 sites were removed, 9 with outline consent and one with a hybrid application pending. However, reference to the monitoring report produced by Braintree Council⁷ shows that sites with only outline permission or resolutions to approve <u>at the base date for the statement</u> (1st April 2018) accounted for over 2,600 dwellings, of which the 10 sites removed amounted to 1,009 dwellings. The information provided by Braintree Council in relation to these sites in the addendum gave an update more than one year later than the base date of the statement. This reflected the time taken to decide the appeal. In these circumstances the question for the SoS was to what extent the sites concerned could have been considered deliverable at the base date.</p> <p>The decision removed an element of the supply that was allocated or with only outline consent, but not even the majority of it. It removed supply about which information was known by April 2019, but we can assume that it was not all known,</p>

⁶ <https://www.gov.uk/government/publications/called-in-decision-land-east-of-gleneagles-way-hatfield-peverel-ref-3180729-8-july-2019>

⁷ <https://publicaccess.braintree.gov.uk/online-applications/search.do?action=simple&searchType=Application> search for appeal 17/00045: appeal correspondence: Revised 5 yr supply position

Representor comment	Council response
<p>only demonstrate a 4.15 year supply. The reason for this is set out in paragraph 41 of the decision letter, which states:</p> <p><i>“Having reviewed the housing trajectory published on 11 April, the Secretary of State considers that the evidence provided to support some of the claimed supply in respect of sites with outline planning permission of 10 dwellings or more, and sites without planning permission do not meet the requirement in the Framework Glossary definition of “deliverable” that there be clear evidence that housing completions will begin on site within five years. He has therefore removed ten sites from the housing trajectory”</i></p> <p>9.32 The ten removed sites are listed in a table provided at Annex D on page 24 of the Secretary of State’s decision letter. Of the ten sites removed from Braintree’s supply, 9 had outline planning permission and the remaining site was an allocated site with a hybrid planning application pending determination. For these sites, Braintree District Council had submitted completed forms and emails from landowners, developers and their agents providing the timescales for the submission of reserved matters applications and anticipated build rates. However, the Secretary of State removed these sites because he did not consider they met the definition of “deliverable” as set out in the Framework. Again a much more detailed level of information to that contained in the Fylde APS.</p> <p>9.33 The Secretary of State made the same conclusions in three other appeal decisions in Braintree at that time: land off Stone Path Drive, Hatfield Peverel³ (ref: 3180725 – 8th July 2019), land off Stone Path Drive, Hatfield Peverel⁴ (ref: 3162004 – 8th July 2019) and land north and south of Flich Way, Pods Brook Road, Braintree⁵ (ref: 3197293 – 13th June 2019).</p>	<p>and that perhaps much of it was not known, at the base date. We cannot know the particular circumstances that led to the judgement on each site, but it is enough to know that the judgement was very much retrospective, and that some of the information is likely to have become apparent much later than the base date (if it had not, Braintree Council’s earlier position, that they did not have a 5 year supply, would not have changed).</p> <p>The SoS removed the sites because the evidence provided to support their deliverability failed to demonstrate that they were deliverable. The form in which information was provided, and its level of detail, is of no consequence: rather, it is the content and significance of it that makes a difference to deliverability. Each case is a matter of planning judgement.</p>
<p>Green Road, Woolpit, Suffolk</p>	<p>This decision⁸ was made in September 2018, and the consideration of the appeal straddled the introduction of the revised Framework of July 2018, and very shortly after the publication of the revised PPG. The assessment made by the Council of its five-year supply had been contained in its AMR dated 11th July 2018 based on the</p>

³ <https://www.gov.uk/government/publications/called-in-decision-land-off-stone-path-drive-hatfield-peverel-ref-3180725-8-july-2019>

⁴ <https://www.gov.uk/government/publications/recovered-appeal-land-off-stone-path-drive-hatfield-peverel-ref-3162004-8-july-2019>

⁵ <https://www.gov.uk/government/publications/recovered-appeal-land-north-and-south-of-flich-way-pods-brook-road-braintree-essex-ref-3197293-13-june-2019>

⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3194926>

Representor comment	Council response
<p>9.34 In allowing the appeal for 49 dwellings at land off Green Road, Woolpit, Inspector Harold Stephens concluded that Mid Sussex [<i>sic.</i>] [Suffolk] Council could not demonstrate a five year supply. The Inspector concluded the following:</p> <ul style="list-style-type: none"> • Sites with outline planning permission made up a very large proportion of Mid Sussex [<i>sic.</i>] [Suffolk] Council’s claimed supply (paragraph 68); • The onus is on the LPA to provide clear evidence that housing completions will begin in the next five years for sites with outline planning permission for major development and allocated sites (paragraph 65); and • Mid Sussex [<i>sic.</i>] [Suffolk] Council’s AMR fell substantially short of producing the evidence that sites with outline planning permission for major development are expected to have as set out in paragraphs 3-035, 3-047 and 3-048 of the previous version of the PPG (paragraphs 68 and 69). 	<p>2012 Framework. It had been sense checked against the new Framework for the appeal, but the Council continued to rely upon the same group of sites.</p> <p>The information provided here states nothing about what evidence was or was not provided, only that an Inspector found another Council’s information inadequate across a wide group of sites with outline planning permission, which given the sudden change of definition of “deliverable”, was unsurprising. The appeal decision notes however that in one case, a site with outline planning permission was deliverable.</p>
<p>Entech House, London Road, Woolmer Green</p> <p>9.35 In allowing an appeal for 72 dwellings, Inspector George Baird concluded that Welwyn Hatfield Borough Council could not demonstrate a five year supply. The Inspector concluded the following:</p> <ul style="list-style-type: none"> • The definition of “deliverable” in the revised Framework goes significantly further than the 2012 Framework (paragraph 30); • The definition of “deliverable” identifies 2 closed lists. Whilst sites with outline planning permission, with permission in principle, allocated in the development plan or identified on a brownfield register can be included within the supply, there is no presumption of deliverability and it is for the LPA to justify their inclusion with clear evidence that housing completions will begin on-site within 5 years (paragraph 30); • The PPG provides a non-exhaustive list of examples of the type of evidence that can be used to justify the inclusion of such sites within the 5 year supply (paragraph 30); and • The information produced by Welwyn Hatfield to support sites with outline planning permission was on data sheets, which the Inspector found to be short of 	<p>The proceedings of this appeal⁹ straddled the introduction of the 2018 Framework and therefore represent an early attempt at interpretation, some elements of which are out-of-date.</p> <p>The Council acknowledges the change in definition and has acted on it in its consideration of the sites to be included in the supply.</p> <p>The lists are not closed: the interpretation by this inspector has been superseded by the Court Case <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS.</p> <p>This confirms that the PPG evidence list is non-exhaustive and merely provides examples of the type of evidence that can be used, rather than specifying that any or all of these pieces of evidence must be provided.</p> <p>The impression given by the representor’s sentence is that data sheets represent inadequate evidence. But the evidence is the information and its significance, rather</p>

⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3190821>

Representor comment	Council response
<p>the “clear evidence” required by the Framework to justify the inclusion of these sites within the housing land supply (paragraph 32).</p>	<p>than its format. This representation sheds no light on the particular evidence provided; it simply tells of the rejection of some sites on an appeal decision.</p>
<p>Land south of Kislingbury Road, Rothersthorpe</p> <p>9.36 Inspector Philip Major agreed with the Appellant (Emery Planning on behalf of Hollins Strategic Land) that South Northamptonshire Council could not demonstrate a deliverable five year housing land supply. In terms of the clear evidence required, the Inspector concluded the following:</p> <ul style="list-style-type: none"> • It is insufficient to rely on the fact that outline planning permission exists. The PPG indicates that the assessment of housing land supply should go further and seek evidence that completions are likely to be forthcoming (paragraph 16); and • Whilst the LPA had assumed that further phases of development on large sites would come forward in the five year period on the basis of delivery of current phases, there was no real evidence to back up the position (paragraph 17); and • A short email from a developer confirming build rates on one of the sites does not amount to the clear evidence of deliverability, which is now required (paragraph 17). 	<p>In this appeal¹⁰, South Northamptonshire Council’s assessment had been based on the 2012 Framework, and the Inspector notes (in paragraph 16) the challenge that the change of definition provided.</p> <p>The assertion that an email “does not” amount to clear evidence attempts to apply the findings of an Inspector’s judgement on the information provided about a particular site in particular circumstances to all sites everywhere. This is clearly inappropriate. The evidence provided here does not demonstrate that emails from developers are not clear evidence. It merely indicates that a particular email in relation to a particular site in Northamptonshire provided insufficient information.</p>
<p>9.37 In summary, the above appeal decisions found that sites with outline planning permission for major development and allocated sites should not be included in the deliverable supply where the respective Councils had failed to provide the clear evidence required. This is also the case in terms of Fylde’s APS for the sites where no clear evidence has been provided.</p> <p>9.38 Even where Councils had produced some evidence, Inspectors and the Secretary of State found that the evidence provided was not enough to include some of the category b) sites as deliverable. In the Rothersthorpe case, this was in the form of an email from a developer. In the Braintree case, this was in the form of proformas and emails from developers with details of who the developer was, when the reserved matters application would be made and what the anticipated build</p>	<p>Fylde Council has provided evidence in relation to all of the sites included. It has reconsidered its position in relation to further evidence provided through the consultation. It will be for the Inspector to determine whether it meets the tests, but the Council considers its position robust.</p> <p>The examples presented provide no principles regarding the evidence needed, because that inevitably depends on the site context, size, complexity, planning status and history and many other factors. The judgements on sites are made individually. Fylde Council has provided information where available and on the basis of its relevance. The Council does not accept that the omitted sites quoted here necessarily</p>

¹⁰ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3206346>

Representor comment	Council response
<p>rates would be. In the Rudgwick and Sturry cases, this was in the form of statements of common ground between the Council and the developer.</p> <p>9.39 When Inspectors and the Secretary of State has consistently omitted sites with a higher level of information, then we respectfully suggest that the Fylde APS cannot comply.</p>	<p>involved provision of a higher level of information: it is what the information is, rather than its format, that determines its usefulness.</p> <p>It should be noted that similar arguments as the representor makes here, were also made in response to the 2019 APS, but the Inspector did not accept such comments on an overall basis, but rather assessed each individual site on merit.</p>
<p>Conclusion</p> <p>9.40 There are two key issues as result of the revised Framework and the updated PPG:</p> <ul style="list-style-type: none"> • Firstly, there has been a radical change in terms of what constitutes a deliverable site; and • Secondly, the Government’s view as to what this means has been set out in the PPG. <p>9.41 Whilst the previous definition in the 2012 Framework considered that all sites with planning permission should be considered deliverable, the revised definition is clear that only sites with detailed consent for major development should be considered deliverable and those with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin in five years.</p> <p>9.42 The revised definition of “deliverable” effectively sets out when sites at various stages of the planning process are realistically expected to deliver dwellings. This was made clear in the Government’s response to the consultation on the then draft revised Framework.</p>	<p>The Council has no comment on this paragraph</p>
<p>9.43 As above, the PPG has been updated to provide the type of evidence required to be able to consider that sites with outline planning permission for major development, allocated sites and sites identified on a brownfield register are deliverable.</p> <p>9.44 Whatever form the “clear evidence” takes, this must be prepared at the same time as the housing land supply position statement and, in accordance with the PPG, should be consulted on if the LPA is not to rely upon ‘after the event’ justification of</p>	<p>The assessment of the Draft APS is not a public inquiry. No application for planning permission is being appealed after refusal. The purpose of the engagement is to seek evidence and views on delivery, not to invite the cross-examination of the evidence</p>

Representor comment	Council response
<p>the kind criticised in the Woolpit appeal decision as we have explained above. Fylde Council has failed to provide the clear evidence necessary and consult on it. For the reasons set out earlier this results in stakeholders not being able to make representations on the full case.</p> <p>9.45 Despite our significant concern on the limited process to date, we have assessed the Council's supply within the context of the revised NPPF and the updated PPG which we now set out.</p>	<p>of others. The Planning Inspectorate will consider the actual evidence submitted and make reasoned conclusions.</p>
<p>10. Contested Supply</p> <p>10.1 The APS sets out a number of components of supply which we now assess and we make a number of deductions. At the outset it is important to state that excluding sites from the 5 year supply is not a reflection on planning aspects of the sites as in the vast majority they are allocated sites to be delivered by 2032. Their exclusion from the 5 year supply is based on Government guidance which seeks to ensure a robust housing land supply and the evidence required is a high test. Therefore, we do not doubt the vast majority of these sites will deliver homes in the plan period, but crucially not in the next 5 years.</p> <p>10.2 We now assess the sites.</p>	<p>Comment noted. In this respect, the recognition by the representor that the sites are suitable confirms that a distinction should be drawn between the sites put forward by Fylde Council in this Draft APS and many of the sites referred to in the appeal decisions above which did not have such status, and as such means that the comparison made by the representor to those appeal circumstances is inappropriate and creates a false impression of the position in Fylde.</p>
Gladman Developments	
<p>The national planning context for the preparation of Annual Position Statements and demonstrating a deliverable five-year supply of housing land is contained in the National Planning Policy Framework (The Framework) and Planning Practice Guidance (PPG) on Housing Supply and Delivery.</p> <p>In this respect, paragraph 73 of the Framework advises that in order to maintain a sufficient supply of housing land:</p> <p>[quotes paragraph 73]</p> <p>In paragraph 74, the Framework further outlines that:</p> <p>[quotes paragraph 74]</p>	<p>These initial paragraphs provide the context, as provided in the Draft APS; the Council has no comment</p>

Representor comment	Council response
<p>Further guidance on the process of preparing an Annual Position Statements [<i>sic.</i>] is provided under the 'Confirming 5 Year Housing Land Supply' section of the PPG on Housing Supply and Delivery.</p> <p>In this regard, PPG ID: 68-012 states that:</p> <p><i>“Where a local planning authority has a recently adopted plan (as set out in the National Planning Policy Framework) and wishes to confirm their 5 year land supply position through an annual position statement, they will need to advise the Planning Inspectorate of their intention to do so by 1 April each year.</i></p> <p><i>To ensure their assessment of the deliverability of sites is robust, the local planning authority will also need to carry out an engagement process to inform the preparation of the statement, before submitting their statement to the Planning Inspectorate for review by 31 July of the same year...”</i></p> <p>Under the heading of “‘What information will annual position statements need to include’, PPG ID: 68-014 advises that “Assessments will need to be realistic and made publically available in an accessible format as soon as they have been completed”, whilst on the topic of engagement, ID: 68-015 advises that:</p> <p><i>“Authorities will need to engage with stakeholders who have an impact on the delivery of sites. The aim is to provide robust challenge and ultimately seek as much agreement as possible, so that the authority can reach a reasoned conclusion on the potential deliverability of sites which may contribute to the 5 year housing land supply...”</i></p>	
<p>Deliverable Housing Sites</p> <p>For the purposes of assessing whether a site can be considered 'deliverable' and therefore suitable for inclusion in an authority's five-year housing land supply assessment or Annual Position Statement, Annexe 2 of the Framework advises that:</p> <p>[quotes Framework glossary definition of “deliverable” in full]</p> <p>Further guidance on what can constitute a deliverable housing site is again provided in the PPG on Housing Land Supply and Delivery (PPG ID: 68-007), which provides</p>	<p>Repeats contents of Framework and PPG</p>

Representor comment	Council response
<p>examples of the evidence that is needed to demonstrate the deliverability of so-called 'category b' sites under the Framework's definition. This includes:</p> <ul style="list-style-type: none"> • Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions; • Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates; • Firm progress with site assessment work; or • Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects. 	
<p>The definition of a deliverable housing site in the context of the latest Framework has also been explored in a number of notable Appeal decisions.</p> <p>These include Land on East Side of Green Road, Woolpit, Suffolk, where the Inspector made clear that the onus was on the local authority to provide clear evidence to demonstrate the deliverability of sites with outline planning permission and those allocated in an adopted Local Plan, and that only sites that fall within the definition of deliverable at the base of an authority's assessment should be included in a Council's five-year land supply calculation:</p> <p><i>"...The Council's supply of deliverable sites should only include sites that fall within the definition of deliverable at the end of the period of assessment i.e. 31 March 2018. Sites that have received planning permission after the cut-off date but prior to the publication of the AMR have therefore been erroneously included within the Council's supply. The inclusion of sites beyond the cut-off date skews the data by overinflating the supply without a corresponding adjustment of need. Indeed that is why there is a clear cut-off date set out in the AMR..."</i></p>	<p>The Council recognises that clear evidence is required with this type of site, and has provided it.</p> <p>In this respect, the Inspector for the Woolpit case argued on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded (paragraph 67 of the report). This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement. The Council acknowledges that this means it should be deliverable at the base date, but it does not imply that a planning permission of particular type must have been granted by then.</p>

Representor comment	Council response
<p>On this point, an Appeal decision in Bures Hamlet, Braintree, considered whether it would be reasonable to conclude that sites that were subject to a resolution to grant planning permission but subject to a S106 at the base date of an authority's assessment are deliverable. In this regard, the Inspector concludes that:</p> <p><i>"...However, I agree (with the Woolpit decision) that new planning permissions after the base date should be excluded and that would include permissions subject to a resolution to grant subject to a Section 106 obligation. Uncertainty about when such an obligation would be completed could put back a potential start date by months or even years..."</i></p>	<p>Again, the Inspector argued on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded (paragraph 67 of the report). This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>This comment by the representor is therefore out-of-date.</p>

Table 4: General Comments on Calculation and COVID-19 Adjustments

Representor Comment	Council Response
Cassidy & Ashton	
<p>The consultation process for the Annual Position Statement could not have been held at a more inconvenient time. With the current pandemic the collation of information and more significantly, future predictions are almost impossible to undertake in a comprehensive and accurate manner.</p> <p>It is acknowledged that the Council has attempted to make predictions and has given its own opinion as to why the pandemic won't have a significant impact upon the delivery of housing in Fylde but as they acknowledge no accurate prediction can be made at this stage. However it is noted that reference is made to extended working hours and commercial imperatives which may encourage developers to make up for lost delivery over a period, which is unlikely to exceed five years.</p> <p>However this does not allow for the economic impact of COVID-19 on the overall housing market, with the only reference being that:</p> <p><i>"... it is much too early to make any assessment and it cannot be justified to make a revision to housing delivery via a blanket approach on the basis of macro-economic outlook and its impact on overall housing demand at this stage. It should be noted that at the base date 1st April 2020, one week into the lockdown, no rational analysis of the position was possible."</i></p> <p>Whilst this position is not disputed it is clear that the only rational approach is therefore to err on the side of caution. The country is currently facing its worst economic crash in generations and this is clearly going to have an impact upon the delivery of housing as was evidenced by the impact of the last economic crash in the late 2,000's.</p> <p>A bullish approach of just carrying on is not appropriate in the circumstances.</p> <p>[Comments follow on a specific site]</p> <p>In respect to other sites it would only be sensible to allow for a reduction in delivery of 10-20% on average to allow for the impact of the pandemic and the economic crash that is accepted as being inevitable.</p>	<p>The Council has not had the approach of just carrying on; rather, it has asked developers to provide their estimate of the impacts. Few provided replies, and no overall conclusion can be drawn from those that did. The Council has provided an adjustment to delivery to reflect delayed delivery due to the lockdown period, in line with the comment of another representor.</p> <p>It is not accepted that simply to reduce the amount of delivery by a proportion would be justified. The adjustment proposed here would represent either 6 months or 1 year's total loss of delivery. This "catastrophe" scenario has no evidence to support it. At the base date, any kind of forecast could have no basis in data, and this remains the position, with economic forecasts being based on "what if" scenarios rather than any kind of reasoned analysis.</p> <p>The Council has made adjustments based on a delay to construction activity of three months. Most sites were closed for two months, and therefore three months provides some additional allowance for reduced activity in the immediate period afterwards.</p>

Representor Comment	Council Response
<p>A more robust calculation of the Borough's housing land supply should take these factors into account.</p>	
<p>Hollins Strategic Land</p>	
<p>1.2 HSL provides information on three sites to demonstrate that the supply should be reduced.</p> <p>1.3 Of the three sites, two have unfortunately been significantly impacted by the COVID pandemic. The dAPS acknowledges the pandemic must take more account of its impact on housing delivery across Fylde by reducing delivery rates.</p> <p>5 COVID pandemic</p> <p>5.1 Unfortunately, the dAPS must take more account of the impact of COVID-19. In a recent appeal decision (Ref: 3238048), an Inspector confirmed that the virus would impact on housing land supply. It is of course too early to ascertain the full extent of the impact, but many development sites across the country came to a standstill, including those associated with Hollins Strategic Land's sister company, Hollins Homes.</p> <p>5.2 Work has now recommenced on Hollins Homes sites, but it will take several months to deliver the rate of development that was achieved before Lockdown. As HH stated with regard HS70 it is likely that the knock on effects will continue well into 2021/22.</p> <p>5.3 Delays on current Hollins Homes development sites will also likely result in knock-on delays at other sites awaiting commencement of development. For example, it is anticipated that employees/contractors who have been working at Hollins Homes' site in Fylde would move onto a site Galgate site in due course. The Fylde site has stalled as a result of Lockdown and so it will now take longer for those workers to relocate to Galgate. This would likely be the case for developers who are currently operating in Fylde and have another Fylde site to move onto.</p>	<p>The Council has also acknowledged that the pandemic would impact on housing supply</p> <p>Noted. The Council accepts the adjustments proposed for the site.</p> <p>Comment noted. The Council has accounted for this in the case of the Wainhomes sites where a delay to one site will knock onto another, and then to a third.</p>

Representor Comment	Council Response
<p>5.4 Furthermore, both Hollins Strategic Land and Hollins Homes have experienced delays in progressing planning/reserved matters/discharge of condition applications since Lockdown began. It has, for example, proved challenging to progress an application for outline permission in neighbouring Wyre because of the implications of Lockdown on Members meetings. Making efficient progress on a Reserved Matters application in Lancaster has also been challenging as a result of government restrictions and companies furloughing staff. It has also proved challenging to progress an application to discharge conditions on site HS70 due to Lancashire County Council officers being redeployed in some circumstances. The delays will subsequently impact on each site, through no fault of the LPA. It is to be expected that other developers/housebuilders will have faced similar issues.</p> <p>5.5 Moreover, a number of housebuilders had to Furlough the majority of Planning/Land staff. Planning consultancies and other disciplines associated with the planning process have had to do the same. This will undoubtedly cause delays across the board, which in turn, will impact on delivery rates.</p>	<p>Comment noted. Although the Council's officers have been available throughout, the Council acknowledges that other authorities and some statutory consultees have been impacted.</p>
<p>5.6 As well as impacting regional housebuilders such as Hollins Homes, the Lockdown will have impacted on builders of all scales, from national to local level. It also remains to be seen how the economic impact will affect the delivery of small sites. The Council may need to review its delivery rate in this regard, at least for the next year.</p> <p>5.7 HSL has sites in Oxfordshire. The Oxfordshire Growth Board Director issued a statement on the impact of COVID-191 and the majority of its content would be equally applicable to Fylde. It demonstrates that the pandemic will cause significant delays in the delivery of housing, both market and affordable. It is considered that Fylde must undertake a similar statement to inform its APS; the absence of such evidence base work would result in an APS that is not robust.</p>	<p>The report attached by the representor gives some brief indications of some of the effects of the lockdown but notes that it is a fast-moving situation and that elements may be out of date soon after publication. Much of the document relates to plans and programmes so is not relevant or comparable. The effects set out in the report are generic. Most of the report centres on impacts on grant-funded affordable housing delivery and the production of the Oxfordshire Plan 2050, in both cases under the backdrop of "<i>a housing market delivery trajectory that was slipping</i>" prior to the crisis (paragraph 7). It is not considered to provide a helpful comparison as a piece of work to support a Draft APS.</p> <p>The Council has invited comment from individual site developers and undertaken a public consultation, to understand likely delivery on individual sites and how it will be impacted. The Council has recognised the impact on site delivery, without setting out a list of specific effects that the Oxfordshire report outlines, focussing instead on the likely outcomes.</p>
<p>6 Conclusions</p> <p>6.1 This RS has demonstrated that:</p>	

Representor Comment	Council Response
<ul style="list-style-type: none"> • Delivery rates should be amended for sites HSS12, HS70 and HS57; • The impact of the COVID-19 pandemic must be fully acknowledged by the Council and delivery rates should be reduced, particularly in circumstances where the Council has not been provided with evidence to the contrary by developers. <p>6.2 As a result, it is considered that significant amendments are required to the dAPS and it is possible that the Council will not be able to demonstrate the required five year supply as a result.</p> <p>6.3 HSL would welcome the opportunity to engage with the LPA on the matter of HLS.</p>	<p>The impact of COVID-19 has been accounted for by reduced delivery on sites in the current year, based on a three-months delay to delivery. This is considered reasonable in the circumstances. This represents a greater reduction than that proposed by Hollins in one case for its own site.</p>
<p>Emery Planning for Wainhomes</p>	
<p>3. Assessment of the Council's housing supply</p> <p>3.1 Our assessment of the Council's five year housing land supply is based on six key stages:</p> <ol style="list-style-type: none"> 1. The base date and five year period; 2. The housing requirement; 3. Identifying the past shortfall; 4. Identifying the method of addressing the past shortfall; 5. Applying the appropriate buffer; and 6. Identifying a Realistic and Deliverable Supply. <p>3.2 Each stage is addressed below.</p>	<p>Noted</p>
<p>4. Stage 1: Agreeing the base date and five year period</p> <p>4.1 The base date is the start date for the five year period for which both the requirement and supply should relate. The Council's APS has a base date of 31st March 2020 with the five year period being 1st April 2020 to 31st March 2025. This is agreed.</p>	<p>Noted. The base date as required by PPG is 1st April in any given year. The Council identifies 1st April 2020 as the base date for this reason, which can of course mean 00:01 hours on that date.</p>

Representor Comment	Council Response
<p>5. Stage 2: Identifying the housing requirement</p> <p>National planning policy and guidance</p> <p>5.1 Paragraph 60 of the Framework states:</p> <p><i>“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”</i></p> <p>5.2 Paragraph 73 of the Framework states:</p> <p><i>“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.”</i></p>	<p>Noted: these are made reference to by the Council in the Draft APS.</p>
<p>5.3 Footnote 37 of the Framework explains that unless the housing requirement set out in the strategic policy has been “reviewed and found not to require updating”, local housing need will be used for assessing whether a five year supply of specific deliverable sites exists using the standard method set out in the PPG where the strategic policy is more than five years old.</p> <p>5.4 Paragraph 3-029 of the PPG explains:</p> <p><i>“The purpose of the 5 year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years.”</i></p>	<p>The Council has no comment on these paragraphs</p>
<p>5.5 Paragraph 3-030 of the PPG states:</p>	<p>The housing requirement for the plan period is 415 dwellings per annum, however as is made clear in the Local Plan (noted in Section 2 of the Draft APS), to address</p>

Representor Comment	Council Response
<p>“Housing requirement figures identified in strategic policies should be used as the starting point for calculating the 5 year land supply figure:</p> <ul style="list-style-type: none"> • for the first 5 years of the plan, and • where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating. <p>In other circumstances, the starting point for calculating the 5 year land supply will be local housing need using the standard method.”</p> <p>5.6 Consequently, it is clear that the five year supply should be measured against the housing requirement set out in strategic policies when those policies are less than five years old and when they are more than five years old, the local housing need figure should be used unless the housing requirement has been reviewed and found not to require updating. In this case, with the Local Plan being adopted in October 2018, the housing requirement must be used.</p> <p>5.7 The Local Plan sets the housing requirement for the Fylde as 415 dwellings per annum. Therefore the requirement for the 5 year period is 2,075 dwellings.</p>	<p>under-delivery in the early part of the plan period through the Local Plan, the residual requirement for the remainder of the plan period of 479 is set out.</p>
<p>Partial Review of the FLP32</p> <p>5.8 Paragraphs 2.6 to 2.9 of the APS refer to the Partial Review of the Local Plan. We do not need to respond on this as the adopted Local Plan is the only requirement to apply which the LPA accept.</p> <p>5.9 However, we note that paragraph 2.7 states that the Council considers it necessary to undertake the Partial Review in order to fulfil the requirements of paragraph 212 of the Framework, which notes that plans may need to be revised to reflect policy changes that the replacement Framework has made. Paragraph 2.8 states that <i>“The Partial Review includes revisions to reflect the change in methodology for calculating minimum local housing need in accordance with paragraph 60 of the Framework.”</i></p> <p>5.10 Table 1a then sets out the supply using the local housing need figure of 275, which is the correct starting point using the current standard method which use the 2014 household projections.</p>	<p>Comment noted</p>

Representor Comment	Council Response									
<p>5.11 The 2018 household projections have now been issued. These are not being used for calculating LHN as the standard method is being revised. However Fylde has seen a significant increase with households increasing by 428 per annum between 2020 and 2030. If we apply (for illustrative purposes only) this household increase to the current standard method the annual requirement would be 466 dwellings per annum which is higher than Policy H1 requirement of 415 dwellings per annum and significantly above the current LHN of 275.</p> <p>5.12 As noted this is not for this APS, but a review of the Local Plan, but it is clear that housing need will increase. In that context delivering the homes people need in this 5 year period is important and a robust 5 year supply is crucial to doing that. As we will establish the LPA cannot demonstrate a 5 year supply and those people in housing need will not be provided with the home they urgently require.</p>	<p>The government decided that the 2014 household projections would remain in use following the publication of the 2016 projections, because methodological changes had resulted in some significant (and some might say bizarre) anomalies. Whilst it is perhaps too early to judge whether this is perpetuated or rectified in the 2018 projections, it is clear that the standard method based on the 2014 projections remains national policy.</p> <p>The representor’s illustrative calculation is correctly done using the 2020-2030 period for household projections and 2019 affordability ratio, the latest available. However, the Council does not consider it to have significance.</p>									
<p>6. Stage 3: Shortfall</p> <p>6.1 Paragraphs 4.4 and 4.6 of the Draft APS states: [quotes paragraphs 4.4, 4.5 and 4.6 of the consultation draft APS]</p> <p>6.2 The shortfall since that date is set out below.</p> <p>Table 1 – Calculating the Backlog</p> <table border="1" data-bbox="109 975 1099 1185"> <tbody> <tr> <td data-bbox="109 975 188 1046">A</td> <td data-bbox="188 975 887 1046">Housing requirement 01/04/11 to 31/03/20 (9 years)</td> <td data-bbox="887 975 1099 1046">3,735</td> </tr> <tr> <td data-bbox="109 1046 188 1118">B</td> <td data-bbox="188 1046 887 1118">Net completions up to 31/03/20</td> <td data-bbox="887 1046 1099 1118">3,121</td> </tr> <tr> <td data-bbox="109 1118 188 1185">C</td> <td data-bbox="188 1118 887 1185">Shortfall at 01/04/20 (A-B)</td> <td data-bbox="887 1118 1099 1185">614</td> </tr> </tbody> </table> <p>6.3 The shortfall is 614 dwellings.</p>	A	Housing requirement 01/04/11 to 31/03/20 (9 years)	3,735	B	Net completions up to 31/03/20	3,121	C	Shortfall at 01/04/20 (A-B)	614	<p>The Local Plan deliberately incorporates the shortfall into a specified residual requirement of 479 for the remainder of the plan period from 2017. Rather than a simple reference to the Liverpool method, this approach to include the figure was required by the Inspector to ensure soundness of the plan. The figure of 479 then needs to be adjusted in the light of delivery in the period since 2017.</p>
A	Housing requirement 01/04/11 to 31/03/20 (9 years)	3,735								
B	Net completions up to 31/03/20	3,121								
C	Shortfall at 01/04/20 (A-B)	614								
<p>7. Stage 4: Identifying the method of addressing the past shortfall</p> <p>7.1 Policy H1 states: <i>“The Council will provide for and manage the delivery of new housing by:</i></p>	<p>Repeats Local Plan which is set out in the APS</p>									

Representor Comment	Council Response
<p><i>a) Setting and applying a minimum housing requirement of 415 net homes per annum for the plan period 2011-2032</i></p> <p><i>b) Keeping under review housing delivery performance on the basis of rolling 3 year completion levels as set out in accordance with the Monitoring Framework at Appendix 8.</i></p> <p><i>“c) Ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply calculated using the “Liverpool” method from the start of each annual monitoring period and in locations that are in line with the Policy DLF1 (Development Locations for Fylde) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Local Plan.</i></p> <p><i>d) The delivery of the developable sites, which are allocated for housing and mixed use from 1 April 2011 to 31 March 2032 and provided for through allowances, to provide for a minimum of 8,715 homes.”</i></p> <p>7.2 As established in the last section, the shortfall in housing delivery for the first 9 years of the plan period (at 1st April 2020) is 614 dwellings.</p>	<p>Repeats the respondent’s earlier comment perhaps for attritional effect.</p>
<p>7.3 On the basis that the Liverpool approach is applied then the figure for the next 5 years is 256 dwellings. This is calculated by dividing 614 by 12 (years) and multiplying by 5 (years). It is this figure that should be added to 2,075 dwellings from Stage 2 above which at 1st April 2020 results in 2,331 dwellings (i.e. 415 X 5 years + 256 past shortfall = 2,331 dwellings).</p> <p>7.4 The draft APS has however calculated a different figure of 2,245 dwellings. This is because the LPA has used the figure of 479 dwellings per annum and multiplied that by the 5 years, with a subtraction of 150 dwellings for the surplus over the last 3 years.</p>	<p>The effect of this calculation is to spread the over-delivery of the last three years (a significant level of over-delivery even against the residual requirement of 479) over the remainder of the plan period. But the extra homes delivered means that this is shortfall that no longer requires addressing, as the needs which the shortfall reflects have been provided for. In accordance with PPG paragraph: 032 Reference ID: 68-032-20190722, the 150 overdelivery against the residual requirement should be set against the total residual requirement for the 5 years of 2,395, which incorporates previous shortfalls.</p>
<p>7.5 Our position is that this is incorrect and contrary to Policy H1. This is because Part A of Policy H1 states that the requirement is 415 dwellings per annum for the period 2011-2032. That is the starting point of the calculation as we have set out in Stage 2. For the purposes of calculating a 5 year supply, which is the purpose of this</p>	<p>The representor has disregarded the supporting text in the Local Plan(see Section 2 of the Draft APS) which explains how the Liverpool approach will be applied.</p>

Representor Comment	Council Response
<p>APS, part C of Policy H1 is clear when it states that “a continuous 5 year supply calculated using the “Liverpool” method from the start of each annual monitoring period” should be provided. The only interpretation of part C is to calculate the shortfall at 1st April 2020 and then apply the Liverpool approach for the remaining 12 years. This would accord with Indicator 2 of Appendix 8 of the Local Plan.</p>	
<p>7.6 The Council has rather used part (B) of Policy H1 to justify their calculation. However the purpose of the 3 year completion level is not for the purposes of a 5 year supply but for other actions as set out in Indicator 1 of Appendix 8.</p> <p>7.7 Therefore, the five-year requirement at 1st April 2020 is 2,331 dwellings (i.e. 415 X 5 years + 256 past shortfall = 2,331 dwellings).</p>	<p>The justification is provided in the supporting text of the Local Plan which explains how the Liverpool method will be implemented.</p>
<p>7.8 Even if the Council was correct in using a 3 year period, what they have done is to deduct the 150 surplus for the next 5 years which is applying the Sedgefield Method. The LPA successfully challenged the Inspectors Report to the 2019 APS on the use of the Sedgefield method, yet now adopt it when they have a surplus. That is contrary to Policy H1 and the subsequent judgement.</p> <p>7.9 If the Council’s approach of using 479 dwellings x 5 years (2,395), then they should not subtract 150 for the 5 year period but rather it should be spread across the plan period (Liverpool approach) and only the proportion of the 150 for the 5 year period should be subtracted. We calculate this to be 63 dwellings (150/12 years x 5 years). Subtracting these 63 dwellings gets to 2,332 dwellings for the 5 year period which is 1 dwelling greater than our approach above.</p> <p>7.10 It is clear that the APS figure of 2,245 is in conflict with Policy H1 and the Court Order. Our figure of 2,331 is the policy compliant method.</p>	<p>This is incorrect. The Liverpool and Sedgefield methods are for dealing with shortfall. Where over-delivery occurs, in accordance with PPG paragraph: 032 Reference ID: 68-032-20190722, it may be set against previous shortfalls (which are incorporated into the 479 figure).</p>
<p>8. Stage 5: Applying the appropriate buffer</p> <p>8.1 Paragraph 73 of the Framework states:</p> <p><i>“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:</i></p>	<p>Copies the Framework</p>

Representor Comment	Council Response																												
<ul style="list-style-type: none"> • 5% to ensure choice and competition in the market for land; or • 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or • 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.” <p>8.2 Footnote 39 of the Framework explains that from November 2018 “significant under delivery” of housing will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.</p> <p>8.3 The Council passed the 2019 HDT and therefore the 5% buffer would apply. However with the advent of the APS, then the 10% buffer has been applied.</p>	<p>Describes what the Council has done.</p>																												
<p>8.4 Under the Liverpool method, the five year requirement at 1st April 2019 is 2,635 dwellings (i.e. 415 X 5 years + 256 past shortfall + 10% buffer = 2,564 dwellings).</p> <p>8.5 The only area of disagreement from Stages 1 to 5 is how the LPA has adjusted the shortfall in establishing the requirement. A summary of the housing requirement is set out in the following table.</p> <p>Table 2: Summary in relation to the housing requirement</p> <table border="1" data-bbox="107 922 1104 1449"> <thead> <tr> <th></th> <th>Requirement</th> <th>LPA</th> <th>Emery</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>Annual requirement</td> <td>479</td> <td>415</td> </tr> <tr> <td>B</td> <td>Past shortfall at 1st April 2020</td> <td>-150</td> <td>614</td> </tr> <tr> <td>C</td> <td>Amount of past shortfall to be addressed in the five year period</td> <td>-150</td> <td>256</td> </tr> <tr> <td>D</td> <td>Total five year requirement (A X 5 + C)</td> <td>2,245</td> <td>2,331</td> </tr> <tr> <td>E</td> <td>Requirement plus 10% buffer (D + 10%)</td> <td>2,470</td> <td>2,564</td> </tr> <tr> <td>F</td> <td>Annual requirement plus buffer (E / 5 years)</td> <td>494</td> <td>513</td> </tr> </tbody> </table>		Requirement	LPA	Emery	A	Annual requirement	479	415	B	Past shortfall at 1st April 2020	-150	614	C	Amount of past shortfall to be addressed in the five year period	-150	256	D	Total five year requirement (A X 5 + C)	2,245	2,331	E	Requirement plus 10% buffer (D + 10%)	2,470	2,564	F	Annual requirement plus buffer (E / 5 years)	494	513	<p>Comment noted</p>
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Representor Comment	Council Response
<p>The impact of Covid-19 on housing land supply</p> <p>10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister’s announcement of the ‘lockdown’ in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.</p> <p>10.61 Secondly, in terms of the definition of “deliverable”, any “clear evidence” provided by the Council to support the deliverability of sites cannot be relied on unless it has taken into account the impact that the Covid-19 will have on build rates.</p>	<p>The effect of the lockdown on site activity is acknowledged.</p> <p>The effect on the economy over subsequent years is conjecture.</p>
<p>10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire. The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:</p> <p><i>“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.</i></p> <p><i>110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the</i></p>	<p>Comment noted. The Council recognises that account needs to be taken of the impact of the lockdown period, with or without reference to the well-known appeal decision quoted.</p>

Representor Comment	Council Response
<p><i>conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</i></p> <p><i>111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</i></p>	
<p>10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:</p> <ul style="list-style-type: none"> • Blackfield End Farm, Warton – 5 dwellings; • Land North of Blackpool Road, Kirkham – 5 dwellings; and, • Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings. <p>10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would expect build rates to reduce and that will be accounted for in the next APS.</p>	<p>The Council accepts the approach taken here by the representor, which involves a shunting backwards of housing delivery by three months. The Council has adjusted its trajectories to show the reduction, by reducing the delivery in the current year 2020/21, and has applied this to all sites where delivery in 2020/21 is at the standard 30 dpa or where a site has a different standard rate (e.g. Coastal Dunes). (An exception is made in the case of The Pastures where the developer has indicated that the site will complete this year, which results in a higher delivery rate than previously). It should be noted that three months delivery represents 8 dwellings at Blackfield End Farm, 6 at Dowbridge and none at Blackpool Road where the site has not commenced yet.</p> <p>Agreed: the delivery figures for 2020-21 will provide an understanding of the effect of the time lost to lockdown.</p> <p>The Council notes that Wainhomes, as the active developer of its' site at Cropper Road East (phase 1 and phase 2 as shown in Table 1) has not disputed delivery rates at these sites in its otherwise extended representation, and therefore suggests that the approach of making overall reductions to build rates is not justified at this time.</p>

Representor Comment	Council Response																																										
<p>11. Conclusions</p> <p>11.1 The Council’s deliverable supply is claimed to be 2,991 dwellings. This equates to 6.01 years applying Liverpool and the 10% buffer. We conclude the LPA is wrong on how they have calculated the shortfall at the base date and based on Policy H1 it should be 2,331 dwellings. With the 10% buffer the 5 year requirement is 2,564 dwellings, which equates to 513 dwellings. This would reduce the supply to 5.83 years.</p>	<p>Comment noted. The Council recognises the approach used but considers its own approach correct.</p>																																										
<p>11.2 The above figures assume that all the sites in the supply are deliverable. However, we have undertaken a detailed assessment of the supply to establish what we consider to be the true supply. We calculate the deliverable supply to be 2,074. The differences in the supply are as follows:</p> <table border="1" data-bbox="107 699 1102 1471"> <thead> <tr> <th>Site ref</th> <th>Deliverable Supply (Council) [<i>sic.</i>]</th> <th>Deliverable Supply (Emery)</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Valentines Kennels, Wilding Lane</td> <td>-114</td> </tr> <tr> <td>2</td> <td>Jubilee House, East Beach, Lytham</td> <td>-20</td> </tr> <tr> <td>3</td> <td>The Galleries, 2-4 Kingsway, Lytham St Annes</td> <td>-9</td> </tr> <tr> <td>4</td> <td>Axa Lytham</td> <td>-30</td> </tr> <tr> <td>5</td> <td>Land at Roseacre, Wilding Lane, St Annes</td> <td>-45</td> </tr> <tr> <td>6</td> <td>Hole in One, Forest Drive, Lytham St Annes</td> <td>-27</td> </tr> <tr> <td>7</td> <td>Cropper Road East, Whitehills</td> <td>-105</td> </tr> <tr> <td>8</td> <td>Whyndyke Farm</td> <td>-30</td> </tr> <tr> <td>9</td> <td>Cropper Road West (HSS5)</td> <td>-169</td> </tr> <tr> <td>10</td> <td>Land North of Freckleton Bypass, Warton</td> <td>-120</td> </tr> <tr> <td>11</td> <td>Clifton House Farm, Lytham Road, Warton</td> <td>-75</td> </tr> <tr> <td>12</td> <td>Brook Mount, 4 Lytham Road, Warton</td> <td>-26</td> </tr> <tr> <td>13</td> <td>Campbells Caravans, Blackpool Road, Kirkham</td> <td>-30</td> </tr> </tbody> </table>	Site ref	Deliverable Supply (Council) [<i>sic.</i>]	Deliverable Supply (Emery)	1	Valentines Kennels, Wilding Lane	-114	2	Jubilee House, East Beach, Lytham	-20	3	The Galleries, 2-4 Kingsway, Lytham St Annes	-9	4	Axa Lytham	-30	5	Land at Roseacre, Wilding Lane, St Annes	-45	6	Hole in One, Forest Drive, Lytham St Annes	-27	7	Cropper Road East, Whitehills	-105	8	Whyndyke Farm	-30	9	Cropper Road West (HSS5)	-169	10	Land North of Freckleton Bypass, Warton	-120	11	Clifton House Farm, Lytham Road, Warton	-75	12	Brook Mount, 4 Lytham Road, Warton	-26	13	Campbells Caravans, Blackpool Road, Kirkham	-30	<p>The Council has accepted some recommended amendments but does not agree with others. Please see Table 1 for the summary position and Table 6 for those sites remaining in dispute.</p>
Site ref	Deliverable Supply (Council) [<i>sic.</i>]	Deliverable Supply (Emery)																																									
1	Valentines Kennels, Wilding Lane	-114																																									
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Representor Comment			Council Response		
14	Former Wesham Park Hospital, Derby Road, Wesham	-51			
15	North of North View Farm, Wrea Green	-21			
16	Cobweb Barn, Oak Lane, Newton	-30			
17	Impact of Covid19	-15			
Total		2,074			
11.3 We now calculate the years supply.			Noted. The Council does not agree with the representor's overall assessment.		
		APS	Emery		
A	Annual requirement	479	415		
B	Past shortfall at 1st April 2020	-150	614		
C	Amount of past shortfall to be addressed in the five year period	-150	256		
D	Total five year requirement (A X 5 + C)	2,245	2,331		
E	Requirement plus 10% buffer (D + 10%)	2,470	2,564		
F	Annual requirement plus buffer (E / 5 years)	494	513		
G	Deliverable Supply	2,991	2,074		
H	Years Supply	6.01	4.05		
11.4 Our assessment is that the supply is 4.05 years .					

Representor Comment	Council Response
Gladman Developments	
<p>Fylde’s Draft 2020 Annual Position Statement</p> <p>The remainder of these representations draw on the aforementioned elements of national planning policy and guidance to comment on the merits of Fylde’s Draft 2020 Annual Position Statement document.</p> <p>Housing Requirement</p> <p>In accordance with paragraph 73 of the Framework, it is agreed that the starting point for calculating Fylde’s five-year housing land supply position is the Council’s adopted Local Plan housing requirement.</p> <p>In this respect, Policy H1 of the adopted Fylde Local Plan to 2032 sets out how the Council will apply a minimum housing requirement of 415 net homes per annum for the plan period 2011-2032, ensuring there is enough deliverable land to provide a continuous 5 year land [supply] calculated against this target from the start of each annual monitoring period.</p> <p>However, we question whether this housing requirement has been applied correctly by the Council when calculating its five-year land supply position in the current draft 2020 APS.</p>	<p>Comment noted. Details of the Local Plan policy are provided in Section 2 of the Draft APS.</p>
<p>In this regard, the table presented on page 24 of the draft 2020 APS uses a baseline figure of 479 dpa as its starting point for the authority’s assessment, referring to this as the ‘Local Plan Residual Housing Requirement incorporating earlier shortfall’. This stems from a rebasing exercise that took place in 2017, to address the shortfall in delivery that had been accrued up to that point (952 dwellings) over the remainder of the Local Plan period to 2032 via the ‘Liverpool’ method.</p> <p>We consider that the starting point figure for the Council’s assessment should be 415 dpa in line with the Council’s adopted housing requirement. Any cumulative shortfall or surplus in housing provision should then be used to amend this target on a rolling basis in each annual update to the Council’s land supply position, to provide a new residual requirement for the rest of the Local Plan period.</p>	<p>“A rebasing exercise that took place in 2017” does not indicate how this was for incorporation within the text of the Local Plan, and was required to ensure soundness of the plan. The residual requirement appears in the text of the Local Plan (as described in Section 2 of the Draft APS) and it is the clear intention of the Local Plan that the 5 year supply should be calculated using it as the starting point, in order to incorporate the Liverpool method.</p>

Representor Comment	Council Response
<p>This is the same approach that would have been adopted when setting the residual figure of 479 dpa in 2017, i.e. taking account of the amount of housing that had already been delivered up to that point. In this context, we disagree with the Council’s approach to addressing the oversupply of 150 units that has been recorded since the Local Plan ‘rebasings’ in April 2017.</p> <p>The Council appear to factor this oversupply into its five-year land supply calculation in its entirety, rather than apportioning it out over the remainder of the Local Plan period, as it did with undersupply in 2017. We submit that this approach is wrong, and that the oversupply should be combined with any shortfall up to the base date of the Council’s latest assessment (1st April 2020) to establish a new residual annual housing requirement for the Council’s calculation.</p>	<p>PPG is clear that over-delivery may be set against previous shortfalls, which are incorporated by the Local Plan into the 479 figure (PPG paragraph: 032 Reference ID: 68-032-20190722).</p>
<p>Applying the above in practice would result in a revised annual housing requirement of 2,563 or 513 dpa (including a 10% buffer) to be used as the basis of the Council 2020 APS five-year housing land supply calculation. This is worked out as follows:</p> <ul style="list-style-type: none"> • Total completions for first 9 years of Local Plan period (2011/12 – 2019/20) – 3,125 dwellings • Equivalent housing requirement for same period – 3,735 dwellings (415 dpa x 9) • Undersupply against adopted housing requirement for first 9 years of Local Plan period – 610 dwellings • Residual housing requirement for remaining 12 years of Local Plan period – 5,590 dwellings, or 466 dpa (415 x 12, + 610 dwellings shortfall, ÷ 12) • Revised baseline requirement plus 10% buffer – 2,563 dwellings, or 513 dpa <p>We therefore believe that this figure of 2,563 dwellings must be used as the starting point for calculating the Council’s housing land supply position, rather than the requirement of 2,470 dwellings that is currently included in the draft 2020 APS document.</p>	<p>Once the buffer is included, the use of the term “requirement” causes confusion.</p> <p>The Council recognises the method used, but considers that only its own method correctly sets over-delivery against the existing shortfall.</p>
<p>The Impact of Covid-19 on Delivery Assumptions</p>	

Representor Comment	Council Response
<p>Another factor that needs to be taken into account in the preparation of the Council's Draft 2020 APS is the impact of the current Covid-19 outbreak.</p> <p>Whilst the movement restrictions that were originally introduced in March 2020 are gradually being eased, it is clear that the Government's 'lockdown' measures had a significant impact on the housebuilding industry. These led to a partial or complete suspension of construction activities on almost all housing schemes, whilst it is likely to be some time before housebuilders can return to full capacity whilst continuing to adhere to social distancing measures.</p> <p>Although it is difficult to accurately forecast the fallout from these measures moving forward, the Covid-19 outbreak is likely to have caused commencement delays on some sites included in the Council's housing trajectory, and the potential for lower than predicted delivery rates from others during the remainder of five-year supply assessment period.</p>	<p>The Council has attempted to gain information from developers regarding delivery rates and delays to sites, through the APS process, and has incorporated information where received.</p>
<p>In light of this, we believe that it would now be prudent to revise the Council's current delivery forecasts to ensure they reflect a post-Covid situation. We note that this point is now being raised in recent Appeal decisions, as can be seen with reference to a scheme in Finchampstead, Berkshire:</p> <p><i>"The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lockdown will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.</i></p> <p><i>The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</i></p>	<p>However, to account for where information has not been provided, the Council has adjusted delivery backwards by three months for the whole supply, in line with the comment of another representor.</p>

Representor Comment	Council Response
<p><i>At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</i></p>	
<p>In paragraph 4.25 of the draft 2020 APS, the Council explain why they believe that it would be inappropriate to apply blanket reductions to its housing land supply forecasts as a result of Covid-19, and are instead relying on individual site promoters to explain the extent to which the delivery of their sites is likely to be affected.</p> <p>However, with the exception of one site listed in the Council’s draft Five-Year Housing Trajectory, (Clifton House Farm), there is currently no evidence to suggest that any such engagement has taken place with applicants or developers, and that any adjustments have been made to the Council’s claimed supply of deliverable housing sites.</p> <p>In the absence of any other discounts for the Covid-19 outbreak, it is difficult to ascertain whether the delivery assumptions contained in the draft 2020 APS are an accurate depiction of housing delivery over the next five years.</p>	<p>The engagement process over two phases of consultation has enabled developers to provide adjustments to the Council regarding site delivery.</p> <p>The initial email circular was sent to all developers of strategic sites that will deliver any significant number within the 5 year period. Four responses were received. The outcomes are set out in Table 1.</p> <p>The Council has then again engaged through the consultation on the draft document, to which the respondent has provided his input.</p> <p>The Council has accepted that some adjustment is necessary and has made adjustments to delivery to several sites (see Table 1 and Appendix 1 to the Draft APS), based on the comments of another representor and on its own approach expressed in the draft document.</p>
<p>Small Scale Sites – Non-Implementation</p> <p>Paragraphs 4.28 to 4.30 of the Draft 2020 APS discuss the case for a non-implementation discount, with the Council explaining why they believe this is not justified when assessing their land supply position.</p> <p>We recognise that the Framework deems small-scale sites (schemes of less than 10 units) to be deliverable unless there is evidence to the contrary, but in reality a number of these permissions are unlikely to be implemented. We note that this was previously acknowledged and accepted by the Council, with the authority incorporating a 10% discount to its projected supply from small planning permissions in past housing land supply assessments.</p> <p>This is particularly relevant when a number of small sites in the Council’s Draft Five-Year Housing Trajectory only benefit from outline planning consent, with no</p>	<p>The Framework goes further than “evidence to the contrary”. It requires clear evidence that homes will not be delivered within five years, for a site to be excluded. The respondent’s assertion provides no such evidence about any site, and therefore any reduction to small site delivery cannot be justified as it could not accord with the Framework definition of deliverable.</p>

Representor Comment	Council Response
<p>commentary on further progress or when a reserved matters application will be submitted.</p> <p>On this basis will believe that [<i>sic.</i>] should be a case for incorporating a 10% non-implementation discount into the Council’s land supply calculation.</p>	
<p>Conclusions on Deliverable Housing Land Supply</p> <p>The above site assessments would result in the removal of 791 dwellings from the Council’s draft five-year housing trajectory. This would leave a revised deliverable supply figure of 2,200 units for the five-year period 2020/21 – 2024/25 (compared to the Council’s figure of 2,991 dwellings).</p> <p>It should be noted that this is before any further discounts that may be required to provide a realistic, post-Covid forecast. As described earlier in these representations, we believe that these discounts must be factored into the Council’s delivery forecasts to provide a robust housing land supply position.</p> <p>When combined with the Council’s re-assessed baseline requirement of 2,563 dwellings, this would result in a housing land supply figure of 4.33 years.</p>	<p>The Council disagrees with the representor’s conclusions.</p> <p>Adjustments have been made to site delivery in the current year to recognise the impact of COVID-19. The Council therefore considers the position set out in the Draft APS as robust.</p>
<p>Conclusions</p> <p>Through its draft 2020 APS, Fylde Borough Council claim that they can demonstrate 6.01 years’ worth of housing supply for the period 2020/21 – 2024/25.</p> <p>However, for the reasons explained in these representations, we believe that this provides an inaccurate representation of the Council’s housing land supply position:</p> <ul style="list-style-type: none"> • The Council’s assessment uses an incorrect baseline requirement as the starting point for the authority’s land supply calculation. Rather than a figure of 2,470 dwellings, we believe that this should be a minimum of 2,563 units • No clear evidence has been provided to support the Council’s delivery claims. In accordance with the Framework and PPG, this is required to demonstrate that the authority’s position is an accurate and robust representation of likely housing delivery over the five-year period. 	<p>The Council disagrees with the representor’s conclusions, which reiterate earlier comments</p>

Representor Comment	Council Response
<p>Furthermore [<i>sic.</i>], the absence of this information makes it difficult to properly scrutinise the authority's sit delivery forecasts, and undermines the purpose of engagement in the APS process</p> <ul style="list-style-type: none"> • The Council's assessments should be revisited to provide a post-Covid situation. Given the partial or complete shutdown of construction activities on housing sites during the Covid-19 outbreak, housing delivery on some schemes may be slower than originally anticipated. It is critical that this is factored into the Council's trajectory. • A review of the Council's deliverable supply assessments suggests that 791 units should be removed from the authority's trajectory. This would result in a revised housing land supply position of 4.33 years, before any further discounts are applied to take account of the current Covid-19 outbreak, or a non-implementation rate. <p>Consequently, Gladman believe that the Council have failed to prepare a robust APS, and the authority's land supply falls short of the required 5 years.</p> <p>It should be remembered that the requirement to demonstrate a five-year housing land supply is a minimum and not maximum obligation. In this respect, the Council should continue to be supportive of sustainable housing schemes that are capable of boosting the authority's deliverable land supply position.</p> <p>This is particularly relevant in the case of Fylde, in light of recent Government projections (the 2018- based household projections released on 29th June 2020) that suggest there is a need to deliver more than the 415 dpa that are currently required by the authority's adopted Local Plan.</p> <p>Gladman hope that the Council finds these representations constructive. We would be happy to discuss any of the points raised in further detail if required.</p>	
PWA Planning	
<p>RESPONSE TO DRAFT ANNUAL POSITION STATEMENT</p> <p>Housing Requirement Figure</p> <p>2.1. The Five-Year Housing Supply period which the draft Annual Position Statement is based on is between 1st April 2020 – 31st March 2025.</p>	<p>Correct</p>

Representor Comment	Council Response
<p>2.2. The Fylde Local Plan to 2032 sets a minimum housing requirement of 415 net homes per annum for the plan period 2011 – 2032. The residual requirement, which incorporates the longstanding backlog, equates to 479 net dwellings per annum, as detailed within the supporting text of Local Plan Policy H1.</p>	<p>Correct</p>
<p>Dealing with the Backlog</p> <p>2.3. Although under PPG guidance, the “Sedgefield” method should be used in order to deal with the level of deficit within the next five-year period, the Inspector at the Local Plan examination determined that the “Liverpool” method was appropriate. This has also been written into Local Plan Policy H1c. It is nonetheless notable that prior to the adoption of the Local Plan to 2032, there was a residual requirement of 7,177 dwellings.</p>	<p>The residual housing requirement of 7,177 was written into the Local Plan to give a residual annual requirement of 479 dpa, as noted above.</p>
<p>Appropriate Buffer</p> <p>2.4. The Council has used an appropriate buffer of 10%, in accordance with NPPF paragraph 73b, given that the Council wishes to demonstrate a five-year supply of deliverable sites through an annual position statement.</p> <p>2.5. As noted in Paragraph 73c of the NPPF, a 20% buffer should be used where the Housing Delivery Test result falls below 85% of the housing requirement, which is considered to represent a significant under delivery of housing. Fylde’s result from the 2018 Housing Delivery Test is 172% and Fylde have provided within the Annual Position Statement the 2019 result of 183%. It is therefore accepted that the appropriate buffer to be used should be 10%.</p>	<p>Agreed</p> <p>Comment noted</p>
<p>Five Year Supply of Deliverable Sites</p> <p>2.6. The Draft Annual Position Statement sets out that, as detailed within Appendix 1, for the total five-year supply of deliverable sites (2,991 dwellings), there would be 2,408 dwellings to be delivered within Strategic Locations. This equates to 80% of the total supply and therefore, there is clearly a reliance on allocated sites delivering the vast majority of the housing requirement within the next five years.</p>	<p>Allocated sites fall into strategic and non-strategic locations. Allocated sites are shown by the site references with prefixes HSS, HS or MUS in the trajectories</p>

Representor Comment	Council Response																		
<p>2.7. Of the total five-year supply of deliverable sites, it is predicted that 31% (823 dwellings) are to be provided through the following 5 sites:</p> <table border="1" data-bbox="107 268 1097 663"> <thead> <tr> <th>Site</th> <th>Site Ref.</th> <th>Total dwellings (2020-2025)</th> </tr> </thead> <tbody> <tr> <td>Queensway, St Annes</td> <td>HSS1</td> <td>125</td> </tr> <tr> <td>Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor</td> <td>HSS4</td> <td>180</td> </tr> <tr> <td>Land North of Blackpool Road, Kirkham</td> <td>HSS9</td> <td>135</td> </tr> <tr> <td>Blackfield End Farm, Warton (1)</td> <td>HSS2</td> <td>139</td> </tr> <tr> <td>Blackfield End Farm, Warton (2)</td> <td>HSS2</td> <td>150</td> </tr> </tbody> </table> <p>2.8. It should be highlighted that within Fylde there has been a longstanding delay in sites delivering the expected number of dwellings and the five-year supply position relies on the delivery of the sites highlighted above, without any fluctuation in delivery rates.</p>	Site	Site Ref.	Total dwellings (2020-2025)	Queensway, St Annes	HSS1	125	Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	180	Land North of Blackpool Road, Kirkham	HSS9	135	Blackfield End Farm, Warton (1)	HSS2	139	Blackfield End Farm, Warton (2)	HSS2	150	<p>Consideration of the trajectories in Appendices 1 and 2 of the Draft APS, in particular the completion data for recent years, shows that sites have delivered as expected, or more rapidly. The delays to initial delivery at the Queensway site have been accounted for and reduced in earlier versions of the trajectory, and maintained in the current version.</p>
Site	Site Ref.	Total dwellings (2020-2025)																	
Queensway, St Annes	HSS1	125																	
Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	180																	
Land North of Blackpool Road, Kirkham	HSS9	135																	
Blackfield End Farm, Warton (1)	HSS2	139																	
Blackfield End Farm, Warton (2)	HSS2	150																	
<p>2.9. According to the 2018 Housing Land Position Statement, base date of 31st March 2019, there was an expected delivery of 888 dwellings for the year 2019-2020. The actual figure, as indicated on the 2020 draft Annual Position Statement was 634 dwellings.</p> <p>2.10. It is notable that between 2011 and 2019, there was an average delivery of 346 dwellings per year within Fylde. The expected delivery for the next year (2020-2021), is anticipated to be 896 dwellings, which is significantly higher than previous years and a substantial increase from the 634 dwellings last year (2019-2020). Given the longstanding issues arising from the delayed build out rates within Fylde, it is considered that the current position of 6.01 years is therefore precarious.</p>	<p>The housing land supply statements necessarily include a buffer in accordance with the Framework and PPG. Earlier statements reflected the 2012 Framework used for the preparation of the Local Plan, and required a 20% buffer, reflecting under-delivery in the early part of the plan period against the Local plan housing requirement of 415 dpa. Therefore, the supply figure in the statement is anticipated to be significantly in excess of delivery. The 634 dwellings delivered in 2019-20 was in excess of the Local Plan residual requirement of 479.</p> <p>The buffer used for the draft APS is 10%, and this is agreed by PWA Planning in their representation. The supply figure of 771 dwellings (note that this has been amended significantly from 896 following the incorporation of outcomes of the engagement through consultation on the Draft APS) includes almost all of the small sites with planning permission. This is due to the application of the standard assumptions. Previously, the trajectory for the local plan spread the total figure for small sites</p>																		

Representor Comment	Council Response										
	commitments over the first three years; however to attempt to do so here would involve making judgements on each small site without further information. Rather than attempt this, as all are regarded as deliverable unless evidence exists to the contrary, they are left in year 1. As with the previous statements, the supply figure across the 5 years includes the buffer and therefore delivery need not meet the supply figure.										
2.11. It is considered that a more smoothed completion rate across the 5 years is a more likely scenario. If the expected completion rates were evenly distributed across the 5 year horizon, this would give annual rates of around 600 units, which is a more likely scenario than a 30% increase in build rates which are already above the historical trend.	The representor proposes a smoothed profile of all of the delivery in the supply but making no reference to the sites that make up that supply or when they are expected to deliver.										
2.12. The APS (paragraph 4.25) seeks to argue that the impact of the Covid-19 pandemic is uncertain but that it is unlikely to create material differences during the five-year time horizon. Given the significance of the APS in the context of ensuring adequate delivery of housing, it is considered that this is too bullish a position to adopt and a more realistic proposition is that the Covid-19 impact would be to push back delivery starts and ongoing completions by between 6 and 12 months. The overall effect would be to mean that all of the completion assumptions would be 'shunted' on by up to 12 months.	The reason for doing this then becomes apparent: the shunting back of delivery by a whole year, so that one fifth of the total supply is lost from the far end. The deduction of 20% of the supply is equivalent to no housing delivery at all for one of the five years 2020/21 – 2024/25. Yet work has recommenced on the majority of sites following the release of lockdown, and therefore a delay of three months to all supply would be a reasonable assumption, also recognising how little was known at the base date. This the Council has incorporated following engagement.										
<p>2.13. Assuming a more smoothed completion rate across the 5 years and combining the effect of Covid-19, which is most easily quantified by assuming that the year 5 (2024 – 2025) is removed from the assessment, would give a revised assessment as follows.</p> <table border="1" data-bbox="114 1118 1099 1455"> <tbody> <tr> <td data-bbox="114 1118 949 1171">FBC assumed five-year supply (deliverable)</td> <td data-bbox="949 1118 1099 1171">+ 2,991</td> </tr> <tr> <td data-bbox="114 1171 949 1224">Smoothed annual completions</td> <td data-bbox="949 1171 1099 1224">(598)</td> </tr> <tr> <td data-bbox="114 1224 949 1315">Less deductions due to Covid-19 delays (year 5 removed from equation)</td> <td data-bbox="949 1224 1099 1315">-598</td> </tr> <tr> <td data-bbox="114 1315 949 1367">Net five-year supply</td> <td data-bbox="949 1315 1099 1367">2,393</td> </tr> <tr> <td data-bbox="114 1367 772 1455">Equivalent supply</td> <td data-bbox="772 1367 1099 1455">2,393/494 4.84 years</td> </tr> </tbody> </table>	FBC assumed five-year supply (deliverable)	+ 2,991	Smoothed annual completions	(598)	Less deductions due to Covid-19 delays (year 5 removed from equation)	-598	Net five-year supply	2,393	Equivalent supply	2,393/494 4.84 years	The Council considers the loss of 20% of the five year delivery to be a “catastrophe” scenario, which if it were widely believed would have already resulted in a financial crisis involving total collapse of value for most or all major housebuilders, which has not occurred. The Council therefore rejects the approach suggested.
FBC assumed five-year supply (deliverable)	+ 2,991										
Smoothed annual completions	(598)										
Less deductions due to Covid-19 delays (year 5 removed from equation)	-598										
Net five-year supply	2,393										
Equivalent supply	2,393/494 4.84 years										

Representor Comment	Council Response
<p>2.14. PWA Planning therefore are of the opinion that Fylde Council is assuming a robust housing supply position at April 2020, which is not fully reflective of the need to use more realistic completion rates across the Borough as a whole and the impact of Covid-19. The housing supply relies heavily on strategic sites continuing their delivery rates, however, there are longstanding delays of sites within Fylde to deliver dwellings as expected. It is highly unlikely that next year there would be the delivery of 896 dwellings, given previous delivery rates. If the sites identified above do not deliver the number of dwellings as predicted, and the effects of Covid-19 are to shift completions on by 12 months this could lead to a housing supply position of under 5 years.</p>	<p>The strategic sites that will be delivering during the five years have, generally, maintained their delivery rates, and some have been faster than would be expected using the base assumptions (e.g. HSS4, HSS8). A broad review of the delivery shown in the plan period trajectory will show that sites once commenced have maintained delivery.</p>
<p>Lancashire County Council – School Planning Team</p>	
<p>Response to the consultation</p> <p>Introduction</p> <p>It is evident the County of Lancashire and the country as a whole are facing significant challenge in all sectors of the economy due to Covid 19 pandemic. It is too early to know what the long term impact this crisis will have across all sectors, in particular the housing market and the delivery of new homes to meet the Governments housing targets.</p> <p>It is noted that the Local Planning Authority LPA has not changed the annual yield of new housing set out and adopted in their local plan 2032. However, information from developers may offer a different view following this consultation.</p> <p>The consultation will also be submitted to The Planning Inspectorate. At all stages The School Planning Team will endeavour to provide the LPA with updated information to assist in this process.</p>	<p>Response noted. The Council will engage with the School Planning Team to provide updates when available, including the submission version of the Draft APS.</p>

Other comments made by representors

- 3.8 Some representors have commented more widely on the various issues connected with the 5-year housing land supply, some more directly connected than others. Comments of this kind have been summarised: the full version of the representation is provided in Annex 4. The Council's responses to comments are set out within the table.

Table 5: Other Comments Made by Representors

Representor comment	Council response
Highways England	
<p>Highways England has no comments to make on the Fylde Council Annual Position Statement on housing delivery.</p> <p>Please contact me if you would like to discuss anything about this email.</p>	<p>Comment noted</p>
Marine Management Organisation	
<p>Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Response to your consultation</p> <p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p>Marine Licensing</p> <p>Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.</p>	<p>Response noted. It is not considered that any issues arise.</p>

Representor comment	Council response
<p>Marine Planning</p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO’s licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist. If you wish to contact your local marine planning officer you can find their details on our gov.uk page.</p> <p>See this map on our website to locate the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our Explore Marine Plans service.</p> <p>[The response then includes sections on the adopted east and south marine plans]</p> <p>[Section follows on the consultation draft north east marine plans]</p> <p>The draft North West Inshore and Offshore marine plans were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. CONSULTATION OPEN UNTIL 20TH APRIL 2020. This is the final stage of statutory public consultation before we submit the marine plan.</p> <p>[Followed by section on draft south east and south west marine plans]</p> <p>[Section follows on minerals and waste plans and local aggregate assessments]</p> <p>If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.</p>	

Representor comment	Council response
Natural England	
<p>Thank you for your consultation.</p> <p>We have reviewed the Five Year Housing Land Supply Annual Position Statement Base date 1st April 2019 (May 2020) and Natural England has no comments to make.</p>	<p>Comment noted</p>
Historic England	
<p>Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.</p> <p>Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.</p> <p>If you have any queries or would like to discuss anything further, please do not hesitate to contact me.</p>	<p>Comment noted</p>
Canal and River Trust	
<p>Thank you for your consultation. The Canal & River Trust have reviewed the details and have no comments to make.</p>	<p>Comment noted</p>
Homes England	
<p>I would firstly like to thank you for the opportunity to comment on the Housing Land Supply – Draft Annual Position Statement.</p> <p>Homes England is the government’s housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we’re making possible the new homes England needs, helping to improve neighbourhoods and grow communities.</p>	<p>Comment noted.</p>

Representor comment	Council response
<p>Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make at representations at this point. We will however continue to engage with you as appropriate.</p>	
Cassidy & Ashton	
<p>I represent various landowners in the Fylde area.</p>	<p>Comment noted. Although not indicated in this representation, Cassidy & Ashton are agents for the owner of the site MUS2 Whyndyke Farm, listed within the Fylde-Blackpool Periphery sites within the Draft APS, and in Tables 1 and 2 above. The Council welcomes the response provided.</p>
Hollins Strategic Land	
<p>1. Introduction</p> <p>1.1 This Response Statement (RS) relates to the Council's Draft Annual Position Statement (dAPS) and focusses on providing information on sites which Hollins Strategic Land have an interest in.</p>	<p>Comment noted. The Council appreciates the engagement provided through the response.</p>
Emery Planning for Wainhomes	
<p>1.1 Emery Planning is instructed by Wainhomes to make representations on the Draft Annual Position Statement (APS) for Fylde Council for the period 1st April 2020 to 31st March 2025.</p> <p>1.2 In summary, there are a number of overarching points which need to be taken into account. These are:-</p> <ul style="list-style-type: none"> • Inadequate consultation which significantly undermines the process; • We have significant concerns that the LPA has not sought documentation from developers, landowners and agents to inform this draft APS which is the only opportunity for representors to make submissions to. It is not meeting the tests of clear evidence for developer, landowner or agent notes or correspondence, simply to be provided to the Planning Inspector only. As a result our assessment is not based on the full evidence that the Council has or that the Inspector will get if the APS is submitted; <p>and,</p>	<p>Noted. The Council welcomes the response to the consultation.</p> <p>This is an introductory summary to a long representation: the Council's comments are addressed at the individual points raised. See Tables 2,3 and 4.</p>

Representor comment	Council response
<ul style="list-style-type: none"> • Notwithstanding our overarching objections, we consider that there should be deductions to specific sites included in the APS as there is not the clear evidence of deliverability set out in the Framework, the PPG and appeal decisions. 	
CPRE	
<p>I am writing to you on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester with comments on the Council’s Draft Annual Position Statement (APS), which sets out the sites which provide the Council’s five-year housing land supply for the base date 1st April 2020.</p> <p>CPRE, The Countryside Charity</p> <p>We want a thriving, beautiful countryside for everyone. We’re working for a countryside that’s rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. With a local CPRE group in every county, we’re advocating nationwide for the kind of countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven’t benefited before. We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate.</p> <p>Draft Annual Position Statement (APS)</p> <p>We note the Council has identified a 6.1 year supply of land. The Council has to be careful that this is not too marginal, as developers will quickly argue sites are unviable to whittle it away.</p> <p>In November 2019 we wrote to the Council concerning the supplementary planning document for affordable housing and we set out the flaws with the Government’s approach to calculating housing requirements using the flawed standard method and out of date Office of National Statistics 2014 data that vastly inflates the number of houses to be built on greenfield with harm to the countryside. The introduction of the Housing Delivery Test in July 2018 penalises the public as if failed, yet more land is allocated for housing. Identifying a high housing requirement that cannot be met is problematic. We urge for realism in the figure and application of up to date data. We urge for a low buffer to be added to give the Council a chance of success against the Housing Delivery Test.</p>	<p>Comment noted.</p> <p>The Council has no comments on this paragraph, which relates primarily to national policy.</p>
<p>In the past few days we have listened to the ‘build, build, build’ mantra of the prime minister. We agree enough new homes ought to be built, particularly affordable homes for people who need it most, but we are aware that there are already a vast number of extant permissions for residential developments, but the viability loopholes allow developers to argue sites are unviable to chase permissions on their interests in</p>	<p>The Council has no comments on this paragraph, which relates primarily to national policy.</p>

Representor comment	Council response
<p>gaining higher values for farmland when permitted for housing. All CPRE seeks is a functioning planning system that allocates sites via a democratic system, so housing doesn't end up on land never intended to be built, such as land that is highest grade farmland, as witnessed by the vexatious appeals allowed on Fylde's high grade farmland. These land assets ought to be protected for future generations. We all need food security.</p> <p>There are plans to deregulate further the planning system. CPRE believes that deregulating planning and cutting up red tape simply won't deliver better quality places. It's already far too easy to build poor quality homes. Our research has shown that three quarters of large housing developments are mediocre or poor in terms of their design and should not have been granted planning permission. Transferring decision making power from local councils and communities and handing them to developers is the exact opposite of 'building back better'.</p>	<p>The Council has no comments on this paragraph, which relates primarily to national policy.</p>
<p>In our view, the best way to deliver the places that we need, at the pace we need them, is to make it easier for local councils to get local plans in place, and then to hold developers to those plans. One glimmer of hope in the prime minister's words was those prioritising building on brownfield to release pressure on greenfield sites. But if we are to truly build back better, and 'level up' across the country, we need to make sure the voice of local communities are strengthened in shaping the homes and places that they will inherit.</p> <p>So with this sentiment in mind we hope that the planning policy team will seek to include as many brownfield sites as is possible, including those identified already on the brownfield register, and any more that exist but are as yet to be fully recorded. Our brownfield research last year showed one in seven homes completed is located on previously developed land, which only became available to the market twelve months previously. These windfall sites are an important source of land and should be adequately reflected in the assumptions. In effect the supply of brownfield land is endless. We note the change to the definition of deliverable yet again moves the goal posts for the Council and makes it even harder to demonstrate a five year housing land supply. The Government really has shown a developer focus with all the recent changes.</p>	<p>The Council has no comments on this paragraph, which relates primarily to national policy.</p> <p>The Council recognises the importance of brownfield land where available. Fylde has only a very small supply of brownfield land, and allocation of greenfield sites in the Local Plan was inevitable.</p>
<p>Of course it is important that the authority does comply with duty to cooperate, but we note other neighbours, such as Lancaster District with the soon to be adopted local plan could deliver some of Wyre's unmet need, on existing brownfield to protect land in the countryside. Plus, the more urban authorities of Blackpool and Preston that need more housing investment, might be able to accommodate shortfalls, rather than Fylde, which is predominately rural and has many environmental designations and natural assets such as Best and Most Versatile farmland.</p>	<p>Comment noted</p>

Representor comment	Council response
<p>We acknowledge the over-achievement of housing completions against the housing targets as set out in Tables 2 and 3 of the Draft Annual Position Statement 2020. Well done for this achievement. In addition we applaud the legal challenge to the appeal decision when the Inspector erred in law. It is due diligence such as this that helps save land in the countryside by supporting the local plan policies and allocations.</p>	
<p>Summary</p> <p>Fylde has beautiful countryside, which we want protecting for future generations. Local plan led housing help to guide sustainable development. We hope planners will continue to do what they can within the current regime to look after rural Fylde, and we hope you are able to prioritise brownfield sites for development as a priority in principle.</p>	<p>Comment noted.</p>
<p>Gladman Developments</p>	
<p>This letter provides Gladman Developments Limited's (Gladman) representations on the Draft 2020 Fylde Borough Council Annual Position Statement (APS). This follows our previous comments on the Council's 2019 APS consultation document in July 2019, prepared by Emery Planning Partnership on our behalf.</p>	<p>Noted. The Council welcomes the contribution made through the response, although it disagrees with its conclusions.</p>
<p>PWA Planning</p>	
<p>INTRODUCTION</p> <p>1.1. PWA Planning are acting on behalf of landowners and developers within the Fylde local authority area to consider and comment on the draft version of Fylde Council's Five- Year Housing Land Supply Annual Position Statement, published June 2020.</p> <p>1.2. The Draft Annual Position Statement indicates that at 1st April 2020, Fylde Council can demonstrate 6.01 years of housing land supply.</p> <p>1.3. The Council welcomes comments from stakeholders and other interested parties on the information contained within the document, including:</p> <ul style="list-style-type: none"> • <i>The Council's overall methodology and assumptions, including lead-in times and build-out rates;</i> 	<p>The Council welcomes the response but disagrees with its conclusion.</p>

Representor comment	Council response
<ul style="list-style-type: none"> <i>The Council's assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).</i> <p>1.4. PWA Planning are unconvinced that the draft 2020 Annual Position Statement published by Fylde Council demonstrates a robust five-year supply position.</p>	
Lancashire County Council – School Planning Team	
<p>Lancashire County Council School Planning Team has received notification from Fylde Borough Council of their consultation Five Year Housing Land Supply, Draft Annual Position Statement June 2020.</p> <p>Responses to the consultation will be submitted to The Planning Inspectorate who will consider whether the correct process has been followed, and if the evidence demonstrates a 5-year supply of deliverable housing sites. Therefore we ask that you accept the response below from Lancashire County Council as part of that submission.</p> <p>The document has been reviewed, any specific comments will refer to the unique draft document reference number if it is perceived a comment is required.</p>	<p>Response noted. The Council will engage with the School Planning Team to provide updated information when it is available, including the submission draft APS.</p>
<p>Education Strategy</p> <p>Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. The Strategy for the provision of school places and school's capital investment 17/18 to 19/20 provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.</p> <p>Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.</p>	

Representor comment	Council response
<p>The SPT produces an Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.</p> <p>The Department of Education has produced new guidance updated November 2019</p> <p>Non-statutory guidance for local authorities planning for education to support housing growth and seeking associated developer contributions, November 2019.</p> <p>This guidance and its purpose enables the local authority with the education responsibility to evidence the need and demand of school places new housing development will have on community infrastructure, including education</p> <p>The evidence supplied through the planning process will identify the impact, and set out the mechanisms for securing developer contributions required to mitigate their impact.</p> <p>The guidance promotes good practice on pupil yield evidence, engagement with local planning authorities and the delivery of expanded or new schools with funding from housing development.</p> <p>Further information and details regarding the new guidance can be found by using the link https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</p>	
<p>In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.</p> <p>Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:</p> <ul style="list-style-type: none"> • Already over-subscribed, • Projected to become over-subscribed within 5 years, or • A development results in demand for a school site to be provided. 	
<p>Partial Review of the Fylde Local Plan 2032 FLP32</p> <p>Points 2.6 to 2.9 make reference to the partial review of FLP32 which was approved for publication March 2020, this is currently suspended due to Covid 19. In this section the LPA refers to meeting the unmet delivery of neighbouring district Wyre Borough Council WBC and the policies relating to this. The school planning team are aware and will be responding to WBC Annual Position Statement Draft Consultation 2020</p>	

Representor comment	Council response
<p>and also aware WBC Local Plan partial consultation is suspended due to Covid 19. The school planning Team will monitor progress of both reviews and respond accordingly</p>	
<p>The five year Housing Land Supply HLS from the LPA is a crucial piece of information used by The School Planning Team to forecast the impact new housing will have on the education provision across the Fylde planning area. Assumptions are applied when forecasting the education position assuming the housing will be delivered in full within the five years HLS. This information is of particular importance on strategic housing development sites with phasing of delivery critical if a new school is identified as part of the development infrastructure.</p> <p>We rely on the LPA to work with developers and land owners to gather as much detail as possible. This information enables School Planning to provide the LPA with a five year education forecast with a high percentage of accuracy, and is key in the planning application assessment process.</p>	
<p>The forecasted position is reviewed annually with the LPA providing a new HLS which is then combined with national statistics such as the birth rate to identify the changing need, and provision of mainstream education. This information is highlighted to the LPA and identifies the areas of priority to be considered through stakeholder engagement, master planning and district wide Infrastructure Delivery Plans IDP.</p> <p>In conclusion, there are many unknown factors during the Covid 19 crisis which rely on The Government to clarify. Restarting the economy may require significant change to current policies including those used in the planning process.</p> <p>We will work with the LPA as this situation moves forward and advise accordingly the potential impact this may have on the provision of education in Fylde.</p>	
<p>NHS Property Services</p>	
<p>Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).</p> <p>Foreword</p>	<p>Response noted. The Council will engage in relation to the site at Wesham which is not referred to in the response.</p>

Representor comment	Council response
<p>NHS Property Services is actively working with our customers regarding the recent cases of coronavirus (COVID-19) and are currently assessing vacant or underused space across our portfolio to identify space that could be repurposed for the provision of clinical beds.</p> <p>In the interests of continuing to support the NHS in the longer term, however, we are keen to continue 'business as usual' activity where possible, and are supporting our customers in the management of their buildings and wider portfolios, to ensure the most efficient and effective use of NHS space.</p> <p>NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p>	
<p>Overview</p> <p>NHS Property Strategy teams support Clinical Commissioning Groups (CCGs) and Sustainability and Transformation Plan (STP) groups to consider ways the local health and public estate can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.</p> <p>The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with the integrated approaches set out within NHS Health Estate Plans. NHSPS work to ensure planning policies support this, both from a development and funding perspective.</p>	
<p>Our Representation</p> <p>The five-year housing land supply draft annual position statement document states that:</p> <p><i>'Local planning authorities will need to engage with developers and others who have an impact on delivery. This will include:</i></p> <ul style="list-style-type: none"> <i>• small and large developers;</i> <i>• land promoters;</i> <i>• private and public landowners;</i> 	

Representor comment	Council response
<ul style="list-style-type: none"> • <i>infrastructure providers (such as utility providers, highways, etc) and other public bodies (such as Homes England);</i> • <i>upper tier authorities (county councils) in two-tier areas;</i> • <i>neighbouring authorities with adjoining or cross-boundary sites; and</i> • <i>any other bodies with an interest in particular sites identified'</i> <p>Where the statement above includes public landowners, NHSPS would like to put forward a response to support in principle the local planning authority's engagement with public landowners, such as NHSPS.</p>	
<p>NHSPS is obliged by MHCLG to deliver more housing. We also have a statutory duty to help finance improved healthcare services and facilities nationally through the disposal of our sites.</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by planning policies, particularly for providing alternative uses (principally housing).</p>	
<p>Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses) and should not be subject to restrictive policies.</p>	
<p>Furthermore, the Government's Public Land for Housing Programme, expressly encouraged the identification and release of surplus central Government land in England for 160,000 new homes by the end of March 2020. All land-owning Government departments including the NHS and their ALBs are within scope of the programme. Hence the Council should be ready to engage with NHSPS should we deem, according to our estate strategy, that we have surplus land that can deliver housing in terms of small site completions.</p>	
<p>It should also be noted that the NHS, Councils and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across boroughs such as the household growth projections provided in Table 1 of the draft APS document. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and Community Infrastructure Levy (CIL) contributions to mitigate the impacts of growth and help deliver transformation plans. Healthcare facilities are essential infrastructure and where new or improved facilities are required; they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The authority should continue to work with NHS commissioners and providers to consider</p>	

Representor comment	Council response
<p>the quantum and location of healthcare facilities that will be required to ensure that new housing growth is sustainable.</p> <p>We are constantly reviewing our sites, and we would support further engagement with the Council on this matter as part of their APS preparation.</p>	
<p>Summary</p> <p>All NHS organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.</p> <p>Should any part of our sites within the Fylde Council administrative area need to be reconfigured or declared surplus to operational healthcare requirements, we believe such sites should be considered suitable for alternative uses, including new residential development, depending on healthcare commissioning needs.</p> <p>NHSPS would welcome any further discussion on these matters. We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me.</p>	
Office for Nuclear Regulation	
<p>Please note that ONR's land use planning processes published at http://www.onr.org.uk/land-use-planning.htm may apply to some of the developments within the Five Year Housing Land Supply Draft Annual Position Statement for Fylde council. In order for ONR to have no objections to such developments we will require:</p> <ul style="list-style-type: none"> • confirmation from Lancashire County Council emergency planners that developments can be accommodated within any emergency plan for the Springfield site required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and • that the developments do not pose an external hazard to the site. <p>Also please see the attached email which includes details of a letter sent to all local authority planning departments regarding forthcoming changes ONR is to make to our consultation zones.</p>	<p>Comment noted. The Draft APS does not make proposals, it identifies those that have been made. Any issues have been considered through the plan-making and decision-taking processes.</p>

4. Sites Remaining in Dispute and Conclusions on Supply

- 4.1 This section identifies those sites which remain in dispute, following the Council's two rounds of engagement described in Section 2, and following the Council's consideration of stakeholder responses and the adjustments to delivery made in Section 3.
- 4.2 PPG requires: *"specific identification of any disputed sites where consensus on likely delivery has not been reached, including sufficient evidence in support of and opposition to the disputed site(s) to allow a Planning Inspector to reach a reasoned conclusion; as well as an indication of the impact of any disputed sites on the number of years of supply"*.
- 4.3 Only two sites within the table are genuine disputed sites, i.e. by the owner or developer of the site or their agent. These are:
- Cropper Road West, disputed by Emery Planning for Wainhomes
 - Land North of Freckleton Bypass, Warton, disputed by Hollins Strategic Land

All other sites are disputed by third parties only. Some owners/developers have provided adjustments to delivery which the Council has incorporated (shown in Table 1), these are consequently not in dispute (at least by the site owner/developer). The owners/developers of all remaining sites have not disputed delivery despite ample opportunity, and therefore should be considered supportive of the Council's position. The principal purpose of the engagement process is to engage with *"stakeholders who have an impact on the delivery of sites. The aim is to provide robust challenge and ultimately seek as much agreement as possible, so that the authority can reach a reasoned conclusion on the potential deliverability of sites"*. Third party challenges do not contribute to this. However, they do provide an opportunity for the Council to *"sense-check"* its own findings in the light of comments received.

- 4.4 Table 4 below provides a schedule of the disputed sites, delivery as projected by the Council, the full text of site-specific objections to the Council's projected delivery, and the Council's rebuttal. The Council's rebuttal should be read in conjunction with the Notes on Deliverability and Delivery on Sites in the right-hand column of the trajectory in Appendix 1 of the Draft APS.

Table 4: Sites Remaining in Dispute

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
HSS1 Queensway, St Annes	36,26,36,27,0	Alban Cassidy, Cassidy & Ashton (third party)	Turning to the individual sites, I repeat the difficulties in obtaining a comprehensive picture but what is evident is the continuing slowdown of delivery at the Queensway site and the impact that this may have upon the delivery of the Lytham Moss link road which itself is vital to the economic growth of the borough. Even the much reduced contribution from this site is over optimistic in the present circumstances and its contribution should be taken out of the calculations for now.	<p>The owner/developer of the site has not disputed the Council's delivery projections.</p> <p>The site is disputed only by a third party representor.</p> <p>This is an active construction site, so to its removal from the supply is entirely inappropriate. The delivery on the site was adjusted by the Inspector in the 2019 APS to correct the numbers that can be delivered to within the limits of the permission before the development of a new highway junction. These numbers are retained in the 2020 APS, with the only adjustment to reflect delivery in 2019-20. The respondent refers to the contribution being much reduced. This is a large site of 948 dwellings in total, all with full planning permission. The delivery of the larger part of the site requires the highways infrastructure in place mentioned above. The Council acknowledges that at present this does not form part of the deliverable supply.</p>
HS2 Jubilee House, East Beach, Lytham	15,5,0,0,0	Emery Planning for Wainhomes (third party)	<p>10.8 Full planning permission was granted in August 2013 for remodelling of an existing office block and the erection of 20 apartments. The permission was part implemented, with the completion of the office works in March 2015. No work on the residential element has commenced. The applicant advised Emery Planning in 2018 as part of our evidence for a planning appeal (Appendix HLS1) that the residential component is on hold until suitable funding streams can be secured. There were also issues with car parking capacity on the site as the office development is now fully occupied.</p> <p>10.9 There is no evidence at all in the APS to counter our specific evidence from 2018 on the site being delivered and therefore we discount the 20 dwellings.</p>	<p>The Council's delivery projections for the site are not disputed by the owner/developer.</p> <p>The site is only disputed by a third party representor.</p> <p>The site has full planning permission and therefore, in accordance with the Framework, is deliverable unless there is <i>"clear evidence that homes will not be delivered within five years"</i>. The respondent's evidence falls far short of this <i>"will not"</i> test. The development could be commenced at any time.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
HS11 The Galleries, 2-4 Kingsway, Lytham	9,0,0,0,0	Emery Planning for Wainhomes (third party)	<p>10.10 Full planning permission was granted November 2015 with a requirement for development to commence by November 2018. The property remains in use as auction rooms (Appendix HLS2) (currently closed due to Covid19) and the permission was not implemented. The property has been marketed for sale since November 2015 (Appendix HLS2) for commercial purposes (with the benefit of the planning permission), indicating that the applicant, who also owns the auction business, does not intend to bring forward the residential redevelopment themselves.</p> <p>10.11 Application 18/0966 was then approved which in essence renews the previous consent. The site continues to be marketed at the time of writing (Appendix HLS2).</p> <p>[the appendix shows an advertisement for the site: see Table 1 or Annex 4 of this document]</p> <p>10.12 Given the site has had a consent for 5 years, has been marketed for in excess of 5 years and is still in use, we discount the 9 dwellings.</p>	<p>Delivery projections for the site are not disputed by the applicant.</p> <p>The site is only disputed by a third party representor.</p> <p>The site has full planning permission and therefore, in accordance with the Framework, is deliverable unless there is <i>"clear evidence that homes will not be delivered within five years"</i>. The respondent's evidence falls far short of this <i>"will not"</i> test. A sale of the premises could be achieved at any time, and the relocation of the business would be straightforward. The continued marketing confirms the applicant's intention to sell. The site is available, suitable and achievable, with full planning permission.</p>
HS14 Axa, Lytham	15,30,20,0,0	Emery Planning for Wainhomes (third party)	<p>10.13 Planning permission was granted (Feb 2018) for specialist accommodation comprising 65 apartments for the elderly (Use Class C2) (Appendix HLS3). As a residential institution falling outside of Class C3 of the use classes order it must be considered against the PPG.</p> <p>[quotes paras. 035 Reference ID: 68-035-20190722 and 016a Reference ID: 63-016a-20190626 of PPG]</p>	<p>The Council's projections are not disputed by the applicant, Gladman, who have made an extensive representation but have not mentioned this site.</p> <p>The development will be C3 use. The planning permission gives consent for a development that consists of 65 individual flats, notwithstanding what is entered for questions 17 and 18 of the application form (this latter may have resulted from concern over a requirement otherwise for affordable housing contributions, but in fact Policy H2 provides an exception to such a requirement in the case of specialist accommodation</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>10.14 Using the same methodology as the LPA use for Valentines Kennels, there should be a discount of 30 dwellings.</p>	<p>for the elderly). The description on the decision notice (as provided by the respondent reads: "Development of Specialist Accommodation for the Elderly Consisting of 65 Apartments With Care, Communal Facilities, Parking and Associated Private Amenity Space". Reference to the approved plans (attached as Appendix 4 to the Draft APS) shows that all accommodation is in the form of self-contained apartments (all flats); the majority of units have two bedrooms, some have three bedrooms; all units including even the very smallest one-bed units (which are few in number) have the bedroom separate from the living accommodation and have dedicated kitchen areas and bathrooms within the unit. The accommodation is quite different from what would be expected in a care home operating as a residential institution, as illustrated by the proposals for the Valentine Kennels site (attached as Appendix 5 of the Draft APS). The flats are individual dwelling units and are therefore treated as such in the trajectories.</p>
<p>HS60 Valentine Kennels, Wildings Lane, St. Annes</p>	<p>0,0,0,114,0</p>	<p>Emery Planning for Wainhomes (third party)</p>	<p>10.3 The APS states: "Local Plan allocated site. Council resolved at committee 15/1/2020 to approve application, subject to S106, adoption of shadow HRA (agreed) and planning conditions, for full planning permission for two storey c2 care village with 205 bedrooms, communal lounge and dining areas, residents library, cinema room and salon plus outside recreation area and car parking. Equivalent to 114 dwelling units in accordance with PPG." 10.4 The application has a resolution to approve at the January 2020 Planning Committee subject to a Section106 agreement. Therefore, at the base date</p>	<p>The Council's projections for the site are not disputed by the applicant. The site is only disputed by third party representors. The application which is has a resolution to grant planning permission is a full application for a substantial care home, supported by an accepted shadow HRA and with all of the detail that is required for such an application. The S106 will provide for contributions for the link road highways scheme also connected with the adjoining site, a travel plan and to improve capacity of the local doctors' surgery. The primary terms of the S106 have been agreed and a draft produced; the legal provisions are being finalised with completion of the agreement expected in August 2020.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>there is not a planning permission and it should not be considered deliverable for the purposes of this APS. We are now some 6 months after committee and there is no correspondence on the planning file after 18th November 2019 and there is no evidence in the APS on progress with the Section106 agreement. From experience as a planning consultancy working on development projects across the country, the lack of a signed Section 106 6 months after a resolution to grant does raise concerns. The main reason is usually viability which if not agreed can result in the permission not being issued or if a change is agreed that it returns to planning committee.</p> <p>10.5 We also note that the Land Registry details (Appendix HLS11) which has a restrictive covenant on the site. There are 6 covenants, the first 2 being:</p> <ol style="list-style-type: none"> 1. Not to erect on any part of the Property hereby conveyed any buildings erections or fixtures other than those intended to be used and in fact used in connection with the use of the land for the carrying on of the business of a market gardener poultry keeper kennel keeper or grazier 2. Not to erect any private dwellinghouse on the Property <p>10.6 We would expect the LPA to have set out clear evidence on this issue and how the permission can be implemented with such covenants.</p> <p>10.7 Therefore at this stage in the process, it cannot be considered deliverable until a planning permission is issued and confirmation that the site is available. We discount the 114 dwellings.</p>	<p>The matter of covenants is for the landowner, but the Council assumes due diligence has been undertaken prior to the preparation and submission of the major planning application, and that a solution is possible.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
		Gladman Developments (third party)	<p>The Council's Draft Housing Trajectory table predicts that this site will deliver 114 units in a single year (2023/24). It records that the corresponding planning application was resolved to be approved on 15th January 2020 subject to the completion of a S106 and planning conditions.</p> <p>At the present time the Council's website indicates that the corresponding S106 agreement is still to be agreed. Other than the information provided in the Council's site delivery notes, no further evidence has been provided to support the authority's assumption that this site will deliver 114 units as suggested.</p> <p>As a site [that] only had a resolution to grant planning permission at the base date of the Council's assessment, and no clarity has been provided on when the accompanying S106 agreement will be resolved or when this scheme is likely to come forward, we believe that the 114 units forecast to be delivered from this site should be removed from the APS document at this stage.</p> <p>Conclusion – remove 114 dwellings from the Council's supply.</p>	<p>The representor is a third party, not the owner or developer.</p> <p>See notes above</p>
HS61 Roseacre, Wildings Lane, St Annes	0,0,15,30,0	Emery Planning for Wainhomes (third party)	<p>10.15 The Decision Notice on the application (Appendix HLS4) is dated 6th November 2016. Condition 1 states: "The development must be begun not later than the expiration of three years beginning with the date of this permission."</p> <p>10.16 There has been no discharge of conditions and despite a later Section 106 agreement, the permission expired on 6th November 2019.</p>	<p>Delivery on the site has not been disputed by the applicant.</p> <p>The site is only disputed by a third party representor.</p> <p>Whilst the expiry of planning permission is a matter of record, the sale of the land is being actively pursued and the Council considers that the site remains deliverable, as the previous permission provided for the dealing with all issues relating to the development of the site, and renewal would be considered a relatively straightforward matter. Delivery has</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			10.17 We discount 45 dwellings.	been moved further back in the five year period to reflect the need for a renewed permission.
Hole in One, Forest Drive, Lytham St Annes	0,0,27,0,0	Emery Planning for Wainhomes (third party)	10.18 The application has a resolution to approve at the December 2019 Planning Committee subject to a Section106 agreement. Therefore, at the base date there is not a planning permission and it should not be considered deliverable for the purposes of this APS. Appendix HLS5 is an email exchange from the agent dated 25th January 2020 that is listed on the LPA's online planning file raising viability issues. There is no subsequent correspondence so notwithstanding the base date point, there is concerns on viability. 10.19 We discount the 27 dwellings.	The owner/developer has not disputed the Council's projections for delivery on the site. The site has only been disputed by third party representors. PPG notes an indicator providing evidence of deliverability can be " <i>firm progress being made towards the submission of an application</i> " (Paragraph: 007 Reference ID: 68-007-20190722). In this case the application has already been made, assessed, considered, accepted and only the final elements before decision remain to be achieved: this goes far beyond the "progress towards" sought in PPG.
		Gladman Developments (third party)	This is another scheme that only befitted [<i>sic.</i>] from a resolution to grant planning permission at the base date of the Council's assessment. The Council's corresponding delivery notes identify that this resolution was subject to access details and the agreement of a S106 agreement. At the present time the Council's website indicates that the corresponding S106 agreement has yet to be agreed, some six months after the application was reported to the authority's planning committee, and there is no evidence that the access details mentioned in the Council's notes have been agreed. As a site that did not have planning permission at the base date of the Council's assessment, and with no clarity on the status of the S106 and access issues, we	

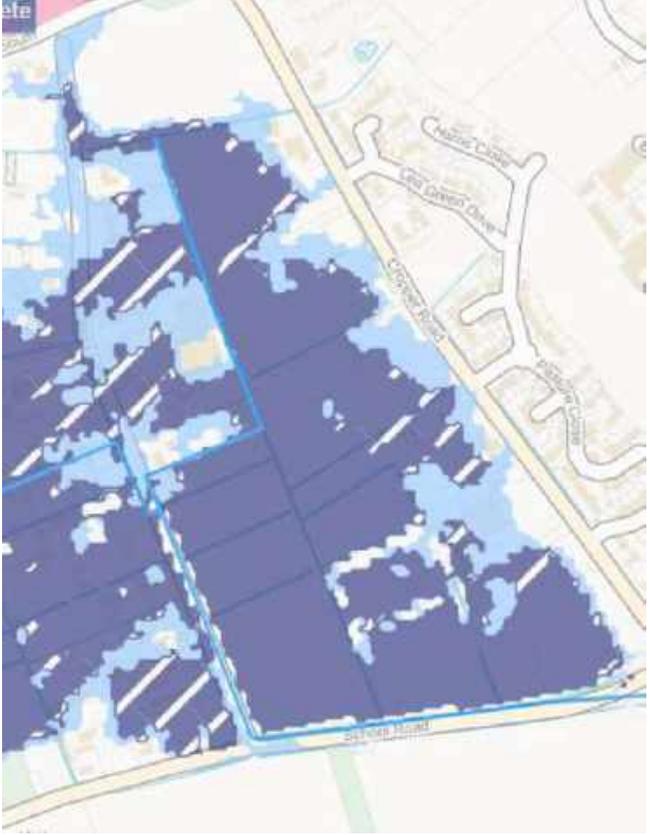
Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>believe that all 22 units should be removed from the Council's deliverable land supply.</p> <p>Conclusion – remove 22 dwellings from the Council's supply.</p>	
MUS2 Whyndyke Farm	0,0,0,0,30	Emery Planning for Wainhomes (third party)	<p>10.26 Whyndyke is a strategic site within Fylde but on the edge of Blackpool. The agent for the owner advised the Local Plan Examination of their lead in times and delivery rates. In their statement for Matter 5 (Appendix HLS7) they state:</p> <p>“In particular Queensway and Whyndyke Garden Village have each taken many years to progress to a reserved matters/outline application stage with no certainty of when delivery is likely to commence. Both are subject to s106 agreements of some complexity with the former reliant upon the delivery of a link road for which funding is not yet guaranteed and the latter the subject of ongoing negotiations of a cross boundary nature which has hindered progress for many years.</p> <p>At the time of preparing this statement, the s106 agreement for Whyndyke Farm remained incomplete despite first being supported by Committee in June 2015. The delay is not due to the developer, rather it relates to ongoing discussions between the other interested parties.</p> <p>It is therefore not clear when either site will commence.”</p> <p>10.27 In their statement to the Stage 3 hearing (Appendix EP7), they state:</p> <p>“Given the ongoing failure of the respective local planning authorities, namely Fylde and Blackpool to</p>	<p>The site owner's agent's response (see Table 1) does not dispute the delivery stated and makes no further comment.</p> <p>The site is only disputed by third party representors.</p> <p>This statement was prepared in advance of the Local Plan Examination hearings which were held in June 2017. The S106 was signed and the decision issued on 5th June 2018.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>agree to the terms of the s106 agreement for Whyndyke Farm, questions must begin to be asked about the extent to which this site will make a full contribution to the housing land supply of Fylde over the plan period.”</p> <p>10.28 The planning application (11/0221) was submitted in March 2011 and the decision (Appendix EP7) was issued on 5th June 2018. Condition 1 requires the first reserved matters application be submitted within three years from the date of this permission. All subsequent reserved matters applications shall be submitted no later than 12 years from the date of this permission and shall be commenced within two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter approved. No reserved matters application has been submitted. On that point alone it should be excluded based on the same reasons as Site 6 above being contrary to part (b) of the deliverability test in the NPPF.</p> <p>10.29 This is also a site that has been in the AMR's since at least 2013 yet there has been no significant progress. Inspector Boniface made the following conclusion in his report to the 2019 APS:</p> <p>“MUS2 Whyndyke Farm, Preston New Road, Whitehills 23.</p> <p>This is a large site for some 1,310 dwellings. Outline planning permission was granted in June 2018, some 7 years after the site was first mooted. Whilst only 30 dwellings have been included in the 5-year trajectory in the final year, 2023/2024, the response from the developer is at best “lukewarm” indicating that no progress has been made since 2018. Here, there is not</p>	<p>The stage 3 hearings were held in December 2017. As noted above, the S106 was signed and the decision issued in June 2018. The comment here represents an out-of-date position.</p> <p>The applicant has made an application to vary the terms of conditions (received 15th May 2020 but the Council were aware of the proposal before the base date) relating to the highway works required in advance of the initial phase of development, in order that the cost of a long length of the main roadway through the site does not fall on the first phase developer. The purpose is to ensure that the development of the first phase can be brought forward quickly. The making of this application represents progress towards the submission of reserved matters applications, which is one of the suggested indicators of deliverability in the PPG. Contrary to the assertion made by the representor, the absence of a reserved matters application at this stage does not debar the site from being considered as deliverable, following the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The Council acknowledges that the Inspector removed the site from the 2019 APS, but the Council submits that the application now being brought forward represents significant progress towards delivery, and represents clear evidence that</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>the clear evidence required to support the inclusion of this site and the supply figure should be reduced by removing 30 units.”</p> <p>10.30 There is no evidence to justify the continual inclusion of the site in Year 5 in the AMRs and now the APS. We therefore exclude the 30 dwellings from Year 5.</p>	<p>the small initial delivery of 30 dwellings will take place within the five-year period.</p>
		<p>Gladman Developments (third party)</p>	<p>This is a long-standing proposal that received outline planning consent in 2015 for a mixed-use development including 1,400 residential dwellings, 20 ha of B2/B8 uses, a new primary school and two local neighbourhood centres.</p> <p>The Council's Draft Housing Trajectory table records that the applicant's agent is working towards a scheme for commencement, but further applications have been submitted to vary the extent of highway works needed at the initial stages.</p> <p>Despite delivery from this site being forecast within five years in a number of past housing land supply assessments, this has failed to materialise. We therefore question whether the assumption that 30 units will be delivered in year 2024/25, on the basis that a reserved matters application must be submitted by January 2021 is a robust assessment of delivery from this complicated site.</p> <p>Whilst we have no comments on the merits of this proposal, as it only currently benefits from outline planning permission, and with no certainty that completions will take place in 2024/25, we believe that</p>	

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>30 units should be removed from the Council's assessment.</p> <p>Conclusion – remove 30 dwellings from the Council's supply.</p>	
HSS5 Cropper Road West	0,0,10,30,30	Emery Planning for Wainhomes (developer of the site)	<p>2.9 ... Whilst we understand contact has been made to landowners and developers on some sites in the supply, the actual clear evidence required by the PPG is not provided. Wainhomes has no record of an approach on Cropper Road West, therefore as a minimum all correspondence should be provided, so representors can at least see what has been provided to the Council as it prepared its APS.</p> <p>10.31 This is a site in the adopted Local Plan. Wainhomes control the majority and BAK Developments control a parcel. Both parties have applications submitted and pending, which are:</p> <p>“17/0779 - Outline Application with access from Cropper Road and School Road for the proposed demolition of existing buildings and structures and residential development for up to 350 dwellings together with associated works and infrastructure”.</p> <p>19/0284 - Residential development of 142 dwellings with associated landscaping and infrastructure”</p> <p>10.32 The site was allocated and both parties maintain the sites are developable in the plan period. However following the allocation and the submission of the applications, the Environment Agency revised its flood</p>	<p>Wainhomes were contacted regarding Cropper Road West. The email sent is attached in Annex 2.</p> <p>Although the current application is made in outline, it has been made by the housing developer Wainhomes who have also produced the masterplan and design code for the site and its neighbour (see below) and therefore these elements reflect a site design that has been drafted in order to be implemented by the applicant, and should make the reserved matters application a more straightforward matter than is often the case. Similarly no marketing and sale of the site will be necessary. The intention of the applicant (as stated at the Local Plan examination) has been to run the site consecutively following the neighbouring site, and the commencement of delivery has been amended to accord with the end of delivery on that site, which has been adjusted (by the Council, not at the behest of the developer) to reflect the COVID-19 lockdown.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>mapping and a large proportion of the site was reclassified as Flood Zone 3 – see below.</p> <p>Extract from FRA:</p> <p>According to the EA Flood Map for Planning (Rivers and Sea) (Figure 2) the site is located in Flood Zone 1.</p>  <p>Figure 2: Environment Agency Flood Map for Planning (Rivers and Sea) (Source: EA website.)</p> <p>Revised EA Flood Map:</p>	<p>The developer has not disputed delivery on their own, neighbouring sites, and has not required any adjustment to the rate of delivery on these for COVID-19. This demonstrates that dwellings on the sites in this area are readily marketable, and that given that delivery will cease on those neighbouring sites, the transfer of construction activity onto this site by the developer can be expected to follow on directly, i.e. on the Council's projection, within the five years.</p> <p>The EA objection is a holding objection. The reassessment of the flood zones was due to the need for renewal and upgrading of a piece of drainage infrastructure following observed effects from the development of a neighbouring site.</p> <p>The EA response to the applicant dated 2nd July 2019 invites the applicant to address issues remaining with the hydraulic model submitted and notes that EA have provided a technical model review report detailing the issues to the applicant.</p> <p>The matter to be dealt with is a technical one and the Council (and apparently the applicant) clearly believe that it is capable of resolution. The Environment Agency have invited the applicant to resolve the issue. In the meantime, the applicant has continued to submit details relating to other aspects of the development (regarding masterplanning, transport assessment, travel plan).</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			 <p data-bbox="705 1093 1355 1460"> 10.33 In our response to the 2019 APS, we stated: “Both applicants are seeking resolution but for the last 9 months this has not been achieved. Further detail is provided below.” 10.34 Inspector Boniface, in his report to the 2019 APS stated: “HSS5 Cropper Road West, Whitehills (Site 1) & Cropper Road West (Bambers Lane), Whitehills (Site 2) 24. These are allocated sites in the Local Plan. An </p>	<p data-bbox="1388 662 2128 1157"> The Council recognises that the objection has taken time to resolve, not least due to the detail involved in the modelling that the applicant has undertaken, and the detailed matters raised by EA in its responses. However, the representor has provided a picture of no further progress from July 2019. The applicant produced a further hydraulic model in October 2019 which was subject to further comments from EA. A further model was in preparation at the base date which has been received on 10th July 2020, together with a revised Flood Risk Assessment and revised masterplan and design code. Therefore, the representor who is also the agent for the applicant has undersold the progress that he must have known was being made on the application up to the base date. </p> <p data-bbox="1388 1181 2128 1396"> Based on the latest information the application has been taken to Planning Committee on 29th July 2020 with a recommendation to approve. The application was delegated to approve subject to the withdrawal of the objection by EA (who had requested more time to process the data submitted in the model) a S106 agreement and conditions. </p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>outline planning application for Site 1 has been submitted for up to 350 units and a full planning application has been submitted for Site 2 for up to 142 units. For Site 1 the trajectory shows delivery of 10 units in Year 4 and 30 units in Year 5. For Site 2 the trajectory shows 15 units in Year 3, 30 units in Year 4 and 30 units in Year 5. It appears that consultants for the developers have prepared Design Codes for these sites. The Environment Agency (EA) has issued a holding objection to the development of these sites following a reassessment of the flood risk. The applicants are responding to the EA and the Council consider the issues are technical and capable of resolution. On balance, given the progress to date, these allocations appear realistic.”</p> <p>10.35 It is now 12 months on and the EA maintain their objection.</p> <p>Application 17/0779</p> <p>10.36 The application was validated on the 11th September 2017 and in their letter dated 2nd August 2018 the Environment Agency provided a response on the application. The letter (Appendix HLS8) states:</p> <p>“Due to a change in circumstances in relation to flood risk, we now wish to object to the application until a satisfactory FRA has been submitted to address this issue.”</p> <p>10.37 Further information was submitted by the Applicant and a further response from the EA dated 2nd July 2019 (Appendix HLS8) has confirmed that their objection remains. The applicant is continuing to seek to address the objection but for the purposes of the APS the site should be excluded from the 5 year</p>	

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>supply. If there is a resolution it may impact on the developable area and the number of dwellings that could be accommodated.</p> <p>10.38 Therefore it is necessary to discount 70 dwellings from years 3, 4 and 5. The site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.</p>	
		Gladman Developments (third party)	<p>This site is an allocation in the Council's adopted Local Plan and is subject to an outline planning application for 350 dwellings.</p> <p>However, as the authority's delivery notes describe, since the allocation was made the Environment Agency have remodelled the flood risk for the area, resulting in the majority of the site being placed [in] Flood Zones 2 and 3. A copy of the Environment Agency's latest flood map is provided as Appendix A to these submissions. [see the original response in Annex 4 to this document].</p> <p>Whilst it is apparent that the applicant is in discussions with the Environment Agency (EA) to find a solution that would enable the site to come forward, it is far from clear whether this dialogue is sufficiently advanced to justify the assumption that 70 units will be delivered from the site in the five-year period.</p> <p>Although we recognise that this site could provide housing over the longer term, given the current uncertainty created by the Environment Agency's revised position, and the fact that the site is yet to benefit from an outline planning consent, we believe</p>	<p>The representor is not the applicant, but a third party</p> <p>See notes above</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>that all 70 dwellings should be removed from the Council's deliverable land supply assessment.</p> <p>Conclusion – remove 70 dwellings from the Council's supply.</p>	
HSS5 Cropper Road West (Bambers Lane site)	0,15,30,30,24	Emery Planning for Wainhomes (third party but applicant for adjoining site, has prepared joint documents with applicant relating to both sites)	<p>Application 19/0284</p> <p>10.39 This application was submitted in April 2019 by BAK Building Contracts Ltd. As with Application 17/0779 the Environment Agency objects to the application (Appendix EP8). For the same reasons as our client's site, for the purposes of the APS the site should be excluded from the 5 year supply. We therefore discount 99 dwellings from years 2, 3, 4 and 5.</p> <p>10.40 As with our client's parcel, the site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.</p>	<p>The site is disputed not by the applicant, but by third parties. The applicant has stated support for the Council's delivery projections, subject to progress with the application (see Table 1).</p> <p>The principle of development on the site is established through the Local Plan. The Council is working with the applicant to ensure that the application can be approved.</p> <p>PPG gives examples of evidence to demonstrate deliverability and includes "firm progress towards the submission of an application". In this case the full application has been submitted, which is more than "firm progress towards" and</p>

		<p>Gladman Developments (third party)</p>	<p>Similar to the site at Cropper Road West described above, this site is also an adopted Local Plan allocation, but has since been reclassified as Flood Zone 2 and 3 by the Environment Agency.</p> <p>The Council's delivery notes again describe how the applicant has engaged consultants to prepare a hydraulic model to challenge the EA's position, but it is far from clear whether this has addressed the EA's concerns or led them to lift their holding objection to the applicant's proposals.</p> <p>We recognise that this site has the potential to deliver housing over the longer-term, once the situation regarding the sit's flood risk status has been resolved. However, in the absence of a solution to this matter, and any formal planning consent, we believe that all 99 dwellings should be removed from the Council's deliverable housing land supply assessment.</p> <p>Conclusion – remove 99 dwellings from the Council's supply</p>	<p>this is considered to be very strong evidence that the site will deliver within 5 years.</p> <p>The EA objection is a holding objection. The reassessment of the flood zones was due to the need for renewal and upgrading of a piece of drainage infrastructure following observed effects from the development of a neighbouring site. The application challenges the flood zone map produced by the EA and provides a hydraulic model to demonstrate that the site should be in flood zone 1 and that the development would not have any adverse impact on the drainage infrastructure.</p> <p>The Council recognises that the objection has taken time to resolve, not least due to the detail involved in the modelling that the applicant has undertaken, and the detailed matters raised by EA in its responses. However, the representor has provided a picture of no further progress from July 2019. The applicant produced a further hydraulic model in October 2019 which was subject to further comments from EA. A further model was in preparation at the base date which has been received on 10th July 2020, together with a revised Flood Risk Assessment and revised masterplan and design code.</p> <p>Based on the latest information the application has been taken to Planning Committee on 29th July 2020 with a recommendation to approve. The application was delegated to approve subject to the withdrawal of the objection by EA (who had requested more time to process the data submitted in the model) a S106 agreement and conditions.</p> <p>The application is for full planning permission and therefore its submission provides evidence of the applicant's full intent to proceed with the development in a timely fashion.</p>
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Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
HSS12 Land North of Freckleton Bypass	0,10,30,30,30	Hollins Strategic Land (site promoter)	<p>4.1 The dAPS states that this site (ref: HSS12) will deliver as follows:</p> <p>2020/21 0</p> <p>2021/22 30</p> <p>2022/23 30</p> <p>2023/24 30</p> <p>2024/25 30</p> <p>4.2 HSL did not secure outline permission on this site but does have an interest in the land. An application for the approval of reserved matters was submitted by Countryside in January 2020 but remains pending nearly 6 months later.</p> <p>4.3 HSL is aware that there are significant unresolved issues with the application proposals which are proving difficult to overcome for the applicant. The Fylde Council Development Management department will be able to confirm this. Indeed, the DM Officer has stated that "there is no realistic prospect for these issues to be addressed comprehensively without a relatively sizeable reduction in the number of dwellings being proposed". There can be no certainty that the RM proposals will be approved.</p> <p>4.4 Indeed, at this stage, it is possible that the RM application could be withdrawn given the LPAs request for a sizeable reduction in the number of dwellings. If this does occur, it must be noted that the outline consent will have expired. As such, any developer would need to obtain a new outline permission and then RM approval or a full planning permission. While the site is</p>	<p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case two applications, a reserved matters application and a separate full application, have already been submitted.</p> <p>The Council acknowledges that the reserved matters and full applications currently pending raised issues of compliance with some Local Plan policies, concerning the layout/ density/ open space within the site. The applicant has indicated a willingness to work with the Council to resolve the issues, rather than have the applications refused as they stood, and has agreed to extensions of time for this to take place. There is no indication that there is a prospect of the application being withdrawn.</p> <p>The Council has adopted the representor's "contingency" projections of delivery for the site, in recognition of the time needed to secure consent and the resultant pushing back of commencement. These projections are from one of the site owners, and therefore represent evidence from those bringing forward the site.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>an allocation, this would undoubtedly result in the site not being deliverable at this point in time.</p> <p>4.5 It is therefore considered that this site should not be included in the five-year supply at present.</p> <p>4.6 Should the Inspectorate deem otherwise on the basis of it being sufficient that a RM application is pending and could be approved if the significant issues can be overcome, it is considered that the delivery rates should not exceed the following:</p> <p>2020/21 0</p> <p>2021/22 10</p> <p>2022/23 30</p> <p>2023/24 30</p> <p>2024/25 30</p> <p>4.7 If the RM application is not withdrawn, it will not be approved until the Autumn at the earliest. A number of pre-commencement conditions will need to be discharged and there is significant upfront infrastructure to be provided, which the LPA is fully aware of. As such, it is highly unlikely that any significant number of dwellings would be delivered in 2020/21.</p>	<p>The progress towards bringing the site forward and the continuing work to progress the site represents clear evidence that delivery will take place within the five year period.</p>
		<p>Emery Planning for Wainhomes (third party)</p>	<p>10.41 Outline consent was granted on Appeal in February 2017 for Warton East Developments Ltd. The APS states:</p> <p>“Local Plan allocated site. Outline planning permission for 350 dwellings. Reserved matters application received 24/1/2020 for 350 dwellings for developer Countryside Properties; also full planning application</p>	<p>This representor disputing the site is a third party.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties are known to have higher delivery rates, so the figure shown are considered very conservative”</p> <p>10.42 Therefore the site has no reserved matters consent at the base date so should be excluded on the basis of part (b) of the definition of deliverable in the Glossary to the NPPF. It should also be noted that the application also has an objection by the Highway Authority and Natural England (Appendices HLS9). We discount the 120 dwellings at this stage. That can of course be reviewed in the APS next year.</p>	<p>As noted in the Council's responses to the representor in Table 2, the approach whereby a site with no current planning permission must be excluded has been rejected. The representor's argument is on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded. This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case a reserved matters application and a full application have already been submitted.</p> <p>As noted above, significant progress has been made towards delivery and the Council and applicant are continuing to work together towards an acceptable scheme. The progress represents clear evidence that the site will deliver within 5 years.</p>
		Gladman Developments (third party)	<p>This site is forecast to deliver 120 dwellings in the five-year period. However, whilst the Council's delivery notes record that the site currently benefits from outline planning consent, the corresponding reserved matters application was submitted on 24th January 2020, and is yet to be determined.</p> <p>The Council's delivery notes also describe how a further planning application seeking permission in full for an</p>	<p>This representor disputing the site is a third party.</p> <p>See notes above</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>additional 14 units was submitted on 31st January 2020. As this application was undetermined at the base date of the Council's assessment, these additional 14 dwellings should not currently contribute to the Council's supply position.</p> <p>As the corresponding reserved matters application was undetermined at the base date of the Council's assessment, and no evidence has been provided to demonstrate how this is progressing and any outstanding issues are being addressed, we believe that all 120 dwellings must be excluded from the authority's deliverable land supply at this stage.</p> <p>Conclusion – remove 120 dwellings from the Council's supply.</p>	<p>The site is considered as a whole, therefore the 14 units have not been considered as "additional" within the trajectory.</p>
HSS13 Clifton House Farm	0,15,20,20,20	Emery Planning for Wainhomes (third party)	<p>10.43 Outline consent was granted on Appeal in February 2017. Reserved Matters was approved on 23rd March 2020. A further duplicate Reserved Matters application is pending. The applicant is Hallam Land Management who are not housebuilders. They are clearly seeking to obtain a implementable consent to ensure the outline permission does not expire.</p> <p>10.44 Therefore there is no clear evidence on delivery and the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • If a buyer is found, a sale proceeds and is completed; • The chosen developer prepares and submits a reserved matters application or further application to vary house types; 	<p>The agent for the site owner has provided revised delivery rates, which the Council has accepted (see Table 1). The delivery on the site is therefore in accordance with the site owner's projections.</p> <p>The respondent is not the developer of the site, but a third party.</p> <p>The site has full planning permission and therefore, in accordance with the Framework, is deliverable unless there is "<i>clear evidence that homes will not be delivered within five years</i>". The respondent's evidence falls far short of this "<i>will not</i>" test. The site is available, suitable and achievable, with full planning permission.</p> <p>The respondent is applying the opposite test, demanding that clear evidence is provided for delivery. This is not the test set</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<ul style="list-style-type: none"> • The reserved matters and/or further applications are approved; • Works to commence development and build infrastructure before any completions. <p>10.45 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework. We discount the 75 dwellings.</p>	<p>out by the Glossary to the Framework. The site has full planning permission and is therefore deliverable: part (a) of the Framework definition of deliverable applies. The respondent does not provide clear evidence that the site will not deliver within five years, which is the test set in part (a) for exclusion of such a site. Reference to part (b) by the respondent is inappropriate as it does not apply.</p>
		Gladman Developments (third party)	<p>The site is predicted to deliver 96 dwellings in the five-year period. It benefits from outline planning consent, with a subsequent reserved matters application being approved on 23rd March 2020.</p> <p>However, the Council's Five-Year Housing Trajectory records that a further reserved matters application is currently pending after being submitted on 5th February 2020. The Council's Public Access system records that this is a duplicate submission of the earlier reserved matters consent, and furthermore that it has been submitted by the land promoter and not a developer.</p> <p>Although we acknowledge that a reserved matters consent was in place at the base date of the Council's latest assessment, it is unclear whether this will be implemented given the new reserved matters submission that has since been made. It is also unclear whether the predicted delivery rates will be achievable with this consent in place, given that the site will likely have to be marketed to a developer.</p> <p>Whilst we do not dispute that this site will come forward in the longer term, we currently believe that there is insufficient certainty to include it within the</p>	<p>The respondent is not the developer of the site, but a third party.</p> <p>The site has full planning permission and therefore, in accordance with the Framework, is deliverable unless there is <i>"clear evidence that homes will not be delivered within five years"</i>. The respondent's evidence falls far short of this <i>"will not"</i> test. The site is available, suitable and achievable, with full planning permission.</p> <p>The respondent is applying the opposite test, demanding that clear evidence is provided for delivery. This is not the test set out by the Glossary to the Framework. The site has full planning permission and is therefore deliverable: part (a) of the Framework definition of deliverable applies. The respondent does not provide clear evidence that the site will not deliver within five years, which is the test set in part (a) for exclusion of such a site.</p> <p>The respondent states that there is <i>"insufficient certainty"</i> for the site's inclusion. As the site has full planning permission, further evidence is not required to justify its inclusion, and in particular not the <i>"certainty"</i> demanded by the representor. Notwithstanding this, the applicant's agent has provided</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>Council's five-year supply. We therefore believe that all 96 dwellings should be removed from the authority's APS at this stage.</p> <p>Conclusion – remove 96 dwellings from the Council's supply.</p>	<p>expected delivery rates and timings which are adjustments to the Council's initial figures, and which the Council has accepted (see Table 1).</p>
<p>Brook Mount, Lytham Road, Warton 4</p>	<p>0,0,26,0,0</p>	<p>Emery Planning for Wainhomes (third party)</p>	<p>10.46 The APS states: "Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019".</p> <p>10.47 The site has no permission at the base date so must be excluded.</p>	<p>Delivery on the site has not been disputed by the applicant.</p> <p>The representor disputing the site is a third party.</p> <p>As noted in the Council's responses to the representor in Table 2, the approach whereby a site with no current planning permission must be excluded has been rejected. The representor's argument is on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded. This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case the full application has already been submitted.</p> <p>The planning application is for 26 affordable dwellings. At the base date the application remained under consideration and information was being produced to overcome technical objections regarding flood risk. This has since been achieved and the application approved subject to a S106 for contributions of £1,000 per dwelling for the provision of public open space. This is considered to be straightforward. The</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
				progress made is clear evidence that the site will deliver within 5 years.
		Gladman Developments (third party)	<p>This site is predicated [<i>sic.</i>] to deliver 26 units in year 2022/23. However, the Council's site delivery notes describe that it is subject to an undetermined planning application that was received on 2nd July 2020 [<i>sic.</i>]. No further evidence is provided to support the site's inclusion in the Council's draft five-year housing trajectory.</p> <p>As a site that is yet to receive planning permission, and with no further evidence or updates on its delivery prospects, we believe that all 26 units should be removed from the Council's land supply assessment.</p>	<p>The respondent disputing the site is a third party.</p> <p>The application was received on 2nd July 2019.</p> <p>See notes above.</p>
HSS9 Land North of Blackpool Road, Kirkham (phase 3)	15,30,30,30,30	Emery Planning for Wainhomes (third party)	<p>10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister's announcement of the 'lockdown' in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.</p> <p>10.61 Secondly, in terms of the definition of "deliverable", any "clear evidence" provided by the Council to support the deliverability of sites cannot be</p>	<p>The delivery projected for this site has not been disputed by the developer.</p> <p>The site is only disputed by a third party.</p> <p>The Council accepts that delivery has been affected by the lockdown period and that this should be shown through reduced delivery for that period. The Council has made adjustments to site delivery on all sites to reflect this. As noted within the Draft APS issued for consultation, on the great majority of sites this has no consequence for the total delivered within five years. In the case of the sites highlighted by this respondent, on one of the sites the site promoter has indicated a slightly larger adjustment, which the Council has accepted (HS57 Brook Farm, Dowbridge, Kirkham); on another, the Council has accepted the adjustment proposed by this respondent (HSS2 Blackfield End Farm (West site)). In the case of this site, the delivery assumptions give only 15 units rather than the standard 30 expected in the first year of delivery. Therefore, the Council does not consider it</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>relied on unless it has taken into account the impact that the Covid-19 will have on build rates.</p> <p>10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire12. The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:</p> <p>“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.</p> <p>110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that</p>	<p>appropriate to reduce delivery for the lockdown period on this site, as delivery would not have been anticipated for the part of the year in question under the assumed rate.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.</p> <p>111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”</p> <p>10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:</p> <ul style="list-style-type: none"> • Blackfield End Farm, Warton – 5 dwellings; • Land North of Blackpool Road, Kirkham – 5 dwellings; and, • Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings. <p>10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would expect build rates to reduce and that will be accounted for in the next APS.</p>	

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
Former Wesham Park Hospital, Derby Road, Wesham	0,0,0,15,30	Emery Planning for Wainhomes (third party)	<p>10.51 The APS states: “Outline planning application for 51 dwellings on previously-developed site within settlement. Principle of development accepted. Council's Planning Committee resolved to grant outline permission on 18/3/2020 subject to S106 agreement relating to affordable housing, contributions for education and public open space. NHS Property Services announced through local press (4/6/2020) that demolition would commence on 8/6/2020 and take 5 months.”</p> <p>10.52 Reference is made to an article in the local press. As with all the LPA's evidence none of it is published as part of this APS which is not acceptable for the reasons set out earlier.</p> <p>10.53 We enclose an article (Appendix HLS10) dated 5th June 2020.</p> <p>“NHS Property Services, which has been tasked with the demolition, says the repurposing of the vacant site, in Derby Road, will help the NHS make significant savings on running costs and better use of the space.</p> <p>After the site has been cleared, it is proposed that half of the land will be developed for new clinical use, with the local CCG having already indicated its aim to develop a new state of the art health centre, which would provide capacity for the two GP practices in Kirkham as well as a variety of community services.</p> <p>The other half of the site has been determined to not be of use for clinical purposes and looks set to be made available for sale.”</p>	<p>Delivery on this site is not disputed by the site owner.</p> <p>The site has only been disputed by third party representors.</p> <p>The site is a previously-developed site, which the site owner has been demonstrably keen to bring forward as early as possible, through the progress towards permission and clearance of the site. The CCG position on the site is set out in its news release on its website¹¹. The release of the site is necessary at an early stage to provide funds for a new primary care facility on another part of the site. It is recognised that further work will be needed but the activity regarding the site to date and the publicity issued provide clear evidence that the site will be brought forward. However, in recognition of the time needed, delivery has been set back by 12 months in the trajectory, following the engagement.</p>

¹¹ <https://www.fyldecoastccgs.nhs.uk/2020/06/statement-on-former-nhs-wesham-offices-from-nhs-property-services/>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>10.54 As with other sites, there is no clear evidence on delivery and having an outline planning application does not justify inclusion as a deliverable site based on the Glossary in the NPPF. Therefore the site needs to be:</p> <ul style="list-style-type: none"> • Marketed; • A sale proceeds and is completed if a buyer can be found; • The chosen developer prepares and submits a reserved matters application; • The reserved matters is approved; • Works to commence development and build infrastructure before any completions. <p>10.55 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework and why they should not be included.</p> <p>10.56 We discount the 51 dwellings.</p>	
		Gladman Developments (third party)	<p>The Council's delivery notes describe how the authority's planning committee resolved to grant outline planning permission for this site on 18th March 2020, subject to the completion of a S106 agreement.</p> <p>The Council's notes further advise that demolition of the existing buildings was due to commence on 8th June 2020 and last for a period of 6 months, based on an article that was published in the local press. However, no further evidence has been provided to support the authority's delivery assumptions.</p> <p>As a site that only had a resolution to grant planning permission at the base date of the Council's housing land supply assessment, and with no clarity on the</p>	<p>The representor is a third party.</p> <p>See notes above</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>status of the accompanying S106 agreement and when this is likely to be agreed, we believe that all 51 dwellings should be removed from the authority's deliverable land supply assessment.</p> <p>Conclusion – remove 51 dwellings from the Council's supply</p>	
197 Kirkham Road, Freckleton	7,0,0,0,0	Gladman Developments (third party)	<p>This scheme is predicated [<i>sic.</i>] to deliver 7 dwellings in year 2020/21 after receiving a resolution to grant planning permission on 15th January 2020.</p> <p>However 3 months of 2020/21 have already passed, and there is no evidence that the corresponding S106 agreement has been finalised and signed. Whilst we recognise that there is a reasonable prospect of completions from this site coming forward within the five-year period, this is considered to be an ambitious timescale.</p> <p>Although this is a 'small site', in the absence of a signed S106 agreement at the base date of the Council's assessment, we also believe that there is a case to remove all 7 units from the Council's land supply assessment.</p> <p>Conclusion – remove 7 dwellings from the Council's supply.</p>	<p>The delivery projected for the site has not been disputed by the owner/developer.</p> <p>The site has only been disputed by a third party representor.</p> <p>The site has an existing full planning permission (18/0155) with S106 agreement for 12 units (net 7), the decision having been issued on 27th February 2019; unfortunately this was omitted from the trajectory.</p> <p>Even had this not been the case, as noted in the Council's responses to the representor in Table 2, the approach whereby a site with no current planning permission must be excluded has been rejected. The representor's argument is on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded. This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case the full application has already been submitted. It has also been taken to planning committee and had a resolution to approve in January.</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
				The decision was issued on 12 th June following the signing of the S106 agreement.
HS73 Land North of Beech Road, Elswick	0,15,30,5,0	Gladman Developments (third party)	<p>This site is predicted to deliver 15 dwellings in year 2020/21, followed by 30 units in 2021/22 and 5 in 2022/23. However, the Council's notes advise that the applicant has recently submitted an application to vary Condition 2 of the original planning permission relating to housing types.</p> <p>It appears that this variation of condition application is still to be determined. Although there is a prospect that all 50 units could come forward in the five year period, at the very least we would suggest that the Council's delivery timescales need to be amended to reflect the fact that 15 dwellings are unlikely to be delivered in 2020/21.</p> <p>Conclusion – question the Council's projected timescales</p>	<p>The agent on behalf of the site owner has indicated in a response to the consultation (see Table 1) that construction on site will begin in early 2021. She also states that the trajectory as set out in Appendix 1 is correct on that basis; however the Council recognises that completions are likely to start in 2021-21 rather than the current year, and has revised projected delivery accordingly.</p> <p>The site has only been disputed by a third party representor, but the representor has not stated that the site should be removed from the supply, or what if any reduction in supply there should be. It has therefore not been included in the total of deductions in Tables 7 and 8.</p> <p>It is acknowledged that the application to vary the condition relating to housing types submitted by the new developer is more likely to be the basis of the scheme to be developed; however there remained an extant full planning permission at the base date. The test for exclusion of the site would be clear evidence that the site will not deliver. The new application by the new developer, only to vary the condition, means that there is clear evidence that the site will deliver.</p>
HS47 Land North of North View Farm, Wrea Green	0,21,0,0,0	Emery Planning for Wainhomes (third party)	<p>10.57 The APS states: "Local Plan allocated site. Planning Committee resolved 12/2/2020 to grant full planning permission subject to S106. Production of the S106 has been undertaken and matters of detail within it are being agreed prior to being finalised and signed."</p>	<p>The site owner/developer has not disputed the delivery projections for the site.</p> <p>The representor is not the applicant, but a third party.</p> <p>As noted in the Council's responses to the representor in Table 2, the approach whereby a site with no current planning permission must be excluded has been rejected. The</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			10.58 The site has no permission at the base date so should be excluded.	<p>representor's argument is on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded. This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case the full application has already been submitted, considered, presented to committee, had a resolution to approve and progress had been made with the S106 prior to the base date.</p>
		Gladman Developments (third party)	<p>This is another scheme that only benefitted from a resolution to grant planning permission at the base date of the Council's assessment, subject to signing a S106 agreement (which is still to be agreed).</p> <p>Applying the strict application of the principles endorsed by the Woolpit and Bures Hamlet Inspectors described earlier in these submissions, we believe that there is a case for removing all 21 dwellings from the Council's land supply assessment.</p> <p>Conclusion – remove 21 dwellings from the Council's supply.</p>	<p>The dispute is raised by a third party representor, not the applicant.</p> <p>As noted above, the approach that reflects the Woolpit decision in its treatment of the definition of deliverable as two closed lists and sites outside these must be excluded has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p>
HS52 Cobweb	0,0,15,15,0	Emery Planning for	10.59 An outline application for 30 dwellings was approved in July 2017. However a new planning	

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
Barn, Oak Lane, Newton		Wainhomes (third party)	application (2003115/FUL has been submitted but not determined at the base date so should be excluded.	The Council's delivery projections for the site are not disputed by the applicant. The site has only been disputed by third party representors.
		Gladman Developments (third party)	<p>This is a site for 30 affordable dwellings, with 15 completions due in 2022/23 and 15 in 2023/24. However, the site is currently the subject of an undetermined planning application, and no further site-specific evidence has been provided to justify its inclusion in the Council's land supply assessment.</p> <p>Whilst there is a reasonable prospect that all 30 dwellings could be completed in the five-year period, there is no planning permission in place or evidence to confirm the site's deliverability at the base date of the Council's assessment. We therefore believe that there is a case to remove all 30 dwellings from the authority's land supply trajectory.</p> <p>Conclusion – remove 30 dwellings from the Council's supply.</p>	<p>As noted in the Council's responses to the representor in Table 2, the approach whereby a site with no current planning permission must be excluded has been rejected. The representor's argument is on the basis that the definition of deliverable was two closed lists, and sites outside these must be excluded. This view has clearly now been found to be incorrect and has been superseded by the High Court decision <i>East Northamptonshire v SSHCLG et al</i> noted in section 2 of the Draft APS, through which the SoS clarifies that any site can be deliverable and whether it is such is a matter of planning judgement.</p> <p>The PPG in paragraph 007 Reference ID: 68-007-20190722 sets out that evidence to demonstrate deliverability may include firm progress being made towards the submission of an application. In this case the full application has already been submitted representing significant and recent progress towards delivery. The highways authority have indicated no objections subject to some standard conditions. The site is available, suitable and achievable, and the efforts to secure a full permission represent clear evidence that the site will deliver within 5 years.</p>
Merlewood Country Park, Cartford Lane, Little Eccleston	82,0,0,0,0	Gladman Developments (third party)	This is a scheme for 82 residential park homes following an appeal to remove a previous occupancy condition relating to the site. This condition appears to have restricted the permanent use of the site to 8 months of the year between 1st March and 31st October, with	<p>The site owner has not disputed delivery projections for the site.</p> <p>The representor disputing the site is a third party.</p> <p>The site has full planning permission for 82 residential units. The representor does not provide clear evidence that homes</p>

Site name	Council's anticipated delivery	By whom disputed	Points raised in dispute, and suggested delivery	Council response
			<p>only holiday use allowed in the remaining four-month period.</p> <p>However, reviewing the associated appeal decision and supporting documents, it is unclear how this change in position will be implemented. The appellant's statement of case refers to the c.140 caravans that are currently present on the site being replaced by 82 modern park homes, but there are no timescales associated with this. It is presumably these park homes that will be occupied on a permanent basis.</p> <p>Whilst we accept that the recent appeal decision would allow the permanent occupation of the site now (albeit limited to 82 caravans), if it is the intention that this will only happen once the existing units have been replaced, this suggests that the 82 units forecast to be delivered in 2020/21 should be pushed back.</p> <p>Conclusion – question the Council's projected timescales</p>	<p>will not be delivered, which is the test for excluding the site from the supply.</p> <p>The representor has not requested removal of all or part of the supply from the calculation directly. It has therefore not been included in the total of deductions in Tables 7 and 8.</p>

The Council's Calculation and the Effect of Disputed Sites

4.5 The disputed sites represent a difference of 878 dwellings in the supply over the five year period. In Tables 7 and 8 below, the concluding position of the Council on the supply, following engagement, is set out in the central column. Deduction of disputed sites gives the supply shown in the right-hand column of Table 7 below. It should be noted that none of the individual representors have suggested that the all of these sites be removed: the position is the aggregate of all suggested:

Table 7: 5 Year Supply: Effects of Disputes to Sites

5 Year Requirement		
Five year housing land supply requirement including shortfall and buffer		2,470
Annualised housing land supply required		494
5-Year Supply	Council's calculation	adjusted Calculation to remove disputed supply
Five Year Supply of Deliverable sites	2,727	1,849
Allowance for windfall sites	80	80
Demolitions allowance	-5	-5
Total supply	2,802	1,924
Over/under supply	332	-546
Equivalent years' supply	5.67 years	3.89 years

4.6 In addition to disputed sites, the methodology used by the Council has also been disputed. Respondents have proposed an alternative, higher calculated five-year requirement due to the different treatment of the shortfall, requested the imposition of a 10% discount to the deliverable small sites included in the supply, and requested a smoothed profile to delivery over the five years with one of the years' supply then being removed to account for the COVID-19 pandemic. Taken together, the effect of amendments to the calculation along the lines suggested would have the effect shown in Table 8. Again, no single representor has requested all of the amendments; in particular, the representor requesting the 20% reduction has not proposed the removal of any sites from the supply. The aggregated position is shown.

Table 8: 5 Year Supply: Effects of Disputes to Sites and Methodology

5 Year Requirement	Council's calculation	Representors' alternative calculation
Five year housing land supply requirement including shortfall and buffer	2,470	2,564
Annualised housing land supply required	494	513
5-Year Supply	Council's adjusted calculation	Calculation to remove disputed supply
Five Year Supply of Deliverable sites	2,727	1,849
Allowance for windfall sites	80	0
Demolitions allowance	-5	-5
Minus 10% non-implementation for small sites (-10% x 276)	N/A	-28
Minus 20% for COVID-19	N/A	-363
Total supply	2,802	1,453
Over/under supply	332	-1,111
Equivalent years' supply	5.67 years	2.83 years

4.7 The results of the recalculation shows that, were the disputed sites to be removed or adjusted in accordance with the views of all respondents seeking such a change to any site, and were other aspects of the methodology altered in accordance with any alternative suggested, the five-year housing land supply would fall to 2.87 years.

4.8 The Council maintains that the sites included provide a robust supply, demonstrated by the evidence the Council has provided in its response to challenge on each site. It notes that where sites were considered to lack sufficient justification, in response to engagement, they have been removed from the supply.

Post-Engagement Calculation

4.9 The calculation shown in the central column of Tables 7 and 8 above has been replicated in the Draft APS and reflects the Council's revised delivery projections as set out in Table 1 of this Engagement Statement, the updated 5 year trajectory and the plan period trajectory attached to the Draft APS.

Annex 1

Emails sent to developers

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: peterliversidge@kensington-developments.co.uk
Subject: Expected housing delivery: Queensway St Annes

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Queensway, St Annes, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 53 homes have been delivered by 1st April 2020 at the site. This leaves 895 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 36 in 2020-21, 26 in 2021-22, 36 in 2022-23, 27 in 2023-24 and 0 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Mark Cox (mcox@morrishomes.co.uk)
Subject: Expected housing delivery: Heyhouses Lane/Shepherd Road, St Annes

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Heyhouses Lane/Shepherd Road St Annes, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, no homes have been delivered by 1st April 2020 at the site. This leaves 146 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and further updated following the grant of reserved matters permission based on standard Local Plan delivery assumptions, gives presumed delivery of 15 completions in 2020-21, 30 in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:56
To: kaite.pearson@persimmonhomes.com
Subject: Expected housing delivery: Coastal Dunes, Squires Gate

Dear madam

We are contacting you to seek information on the expected delivery of housing on your site at Coastal Dunes, Squires Gate, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 76 homes on the first phase (complete) and 167 homes on the second phase have been delivered by 1st April 2020 at the site. This leaves 186 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 45 in 2020-21, 45 in 2021-22, 45 in 2022-23, 45 in 2023-24 and 6 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Claire Norris (claire.norris@persimmonhomes.com)
Subject: Expected housing delivery: Coastal Dunes, Squires Gate

Dear madam

We are contacting you to seek information on the expected delivery of housing on your site at Coastal Dunes, Squires Gate, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 76 homes on the first phase (complete) and 167 homes on the second phase have been delivered by 1st April 2020 at the site. This leaves 186 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 45 in 2020-21, 45 in 2021-22, 45 in 2022-23, 45 in 2023-24 and 6 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Iain.Fowler@wainhomes.net
Subject: Expected housing delivery: Cropper Road East Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your sites at Cropper Road East, Whitehills, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 139 homes have been delivered by 1st April 2020 at the first site. This leaves 7 homes with planning permission at the first site and 80 at the second site.

It is presumed that delivery of the 7 remaining units will take place in 2020-21. The housing trajectory for the second site updated in last year's Five Year Housing Land Supply: Annual Position Statement gives presumed delivery of 30 homes in 2020-21, 30 in 2021-22 and 20 in 2022-23.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 26 May 2020 12:44
To: Jones, Gary (RD PG)
Subject: Expected housing delivery: Old House Lane, Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Old House Lane, Whitehills, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

The Council's records show 265 homes with outline planning permission.

Use of the standard delivery assumptions used for the Local Plan gives presumed delivery of 0 in 2020-21, 15 homes in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25. (It is recognised that this would be dependent on the progress of any reserved matters application). Any further information you can provide regarding the submission of any reserved matters application would be helpful.

Please could you confirm whether this delivery rate conforms with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect the bringing forward of the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:52
To: Alban Cassidy (AlbanCassidy@cassidyashton.co.uk)
Subject: Expected housing delivery: Whyndyke

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Whyndyke, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on the Council's records, there is outline planning permission for 1,310 homes in Fylde.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, gives presumed delivery of 30 homes in 2024-25. This timescale is based on the requirement in the outline planning permission for the first application for reserved matters to be made before 5th June 2021.

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect delivery of the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Iain.Fowler@wainhomes.net
Subject: Expected housing delivery: Cropper Road West Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Cropper Road West, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, gives presumed delivery of 10 homes in 2022-23 to run on from delivery on the Cropper Road East site, 30 in 2023-24 and 30 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate whether you expect delivery on this site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 26 May 2020 10:07
To: Amanda Oakden (amanda@chadkirkconsulting.co.uk)
Subject: Expected housing delivery: Bambers Lane, Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Bambers Lane, Whitehills, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement gives presumed delivery of 0 in 2020-21, 15 homes in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25. (It is recognised that any delivery on the site will be dependent on the resolution of remaining issues with the planning application).

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate whether you expect delivery on the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Andrew Mitchell (andrew.mitchell@miller.co.uk)
Subject: Expected housing delivery: Blackfield End Farm (east side)

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Blackfield End Farm east side, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 31 homes have been delivered by 1st April 2020 at the site. This leaves 139 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 30 homes in 2020-21, 30 in 2021-22, 30 in 2022-23, 30 in 2023-24 and 19 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: Ben Sutton (bsutton@stewartmilne.com)
Subject: Expected housing delivery: Blackfield End Farm (west side)

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Blackfield End Farm west side, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on the Council's building control records, development has commenced but no homes were completed by 1st April 2020 at the site. This leaves 164 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and updated in the light of completions data for last year, gives presumed delivery of 15 homes in 2020-21, 30 in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25.

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:53
To: kevin.d.furey@barratthomes.co.uk
Subject: Expected housing delivery: Highgate Park, Warton

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Highgate Park, Warton, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 184 homes have been delivered by 1st April 2020 at the site. This leaves 70 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 30 in 2020-21, 30 in 2021-22 and 10 in 2022-23.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:52
To: Matthew Symons (matthew.symons@hsland.co.uk)
Subject: Expected housing delivery: Land North of Freckleton Bypass, Warton

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Land N of Freckleton Bypass, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on our records the site has 350 homes with outline planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, gives presumed delivery of 30 homes in 2022-23, 30 in 2023-24 and 60 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate whether you expect the bringing forward of the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:52
To: Hayley Knight
Subject: Expected housing delivery: Clifton House Farm

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Clifton House Farm Warton, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Our records show that the site has planning permission for 96 homes.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and further updated to reflect the latest planning consent, gives presumed delivery of 15 in 2020-21, 30 in 2021-22, 30 in 2022-23, 21 in 2023-24 and 0 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 09:52
To: jon.gould@rowland.co.uk
Subject: Expected housing delivery: The Pastures, Wesham

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at The Pastures, Wesham, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 211 homes have been delivered by 1st April 2020 at the site. This leaves 53 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 44 in 2020-21 and 9 in 2021-22.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 10:08
To: kevin.d.furey@barratthomes.co.uk
Subject: Expected housing delivery: Land N of Blackpool Road, Kirkham

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Land North of Blackpool Road Kirkham, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 162 homes have been delivered by 1st April 2020 at the site. This leaves 35 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 30 homes in 2020-21 and 5 in 2021-22.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 10:03
To: Mark Cox (mcox@morrishomes.co.uk)
Subject: Expected housing delivery: Land N of Blackpool Rd Kirkham

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Land North of Blackpool Road Kirkham, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Our records at 1st April 2020 show 231 homes with planning permission at the site.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, based on the Local Plan assumed delivery rates and updated to reflect the current planning consent, gives presumed delivery of 15 in 2020-21, 30 in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25.

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Eddie Graves

From: Eddie Graves
Sent: 24 May 2020 10:13
To: Adam Galleymore
Subject: FW: Expected housing delivery: Brook Farm, Dowbridge, Kirkham

Forwarded as requested

From: Eddie Graves
Sent: 24 May 2020 10:05
To: Martin Nugent (martin.nugent@storyhomes.co.uk) <martin.nugent@storyhomes.co.uk>
Subject: Expected housing delivery: Brook Farm, Dowbridge, Kirkham

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Brook Farm Dowbridge Kirkham, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 1 home has been delivered by 1st April 2020 at the site. This leaves 169 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 30 homes in 2020-21, 30 in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25.

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards

Annex 2

Responses to the initial emails

Eddie Graves

From: Jones, Gary (RD PG) <Gary.Jones@lancashire.gov.uk>
Sent: 26 May 2020 13:07
To: Eddie Graves
Subject: 200526 Expected housing delivery: Old House Lane, Whitehills

Hi Eddie it took Fylde circa 5 years to grant planning consent from application stage to consent.

I think it's a bit rich to ask for a response within 7 working days. I would just suggest you use your projected data. Clearly housing numbers will be determined by the developer who secures the site.

Regards

Gary Jones BSc (Hons) MRICS, RICS Registered Valuer
Estates Manager
Estates
Lancashire County Council
T: 01772 533864
W: www.lancashire.gov.uk

gary.jones@lancashire.gov.uk

From: Eddie Graves <eddie.graves@fylde.gov.uk>
Sent: 26 May 2020 12:44
To: Jones, Gary (RD PG) <Gary.Jones@lancashire.gov.uk>
Subject: Expected housing delivery: Old House Lane, Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Old House Lane, Whitehills, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

The Council's records show 265 homes with outline planning permission.

Use of the standard delivery assumptions used for the Local Plan gives presumed delivery of 0 in 2020-21, 15 homes in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25. (It is recognised that this would be dependent on the progress of any reserved matters application). Any further information you can provide regarding the submission of any reserved matters application would be helpful.

Please could you confirm whether this delivery rate conforms with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect the bringing forward of the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards



Eddie Graves

Principal Planning Officer (Policy)

t: 01253 658419

e: eddie.graves@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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Eddie Graves

From: Amanda Oakden <amanda@chadkirkconsulting.co.uk>
Sent: 10 June 2020 12:23
To: Eddie Graves
Subject: RE: Expected housing delivery: Bambers Lane, Whitehills

Hi Eddie

The figures stated are correct all things being well with the planning application.

Many thanks
Mandy

From: Eddie Graves <eddie.graves@fylde.gov.uk>
Sent: 26 May 2020 10:07
To: Amanda Oakden <amanda@chadkirkconsulting.co.uk>
Subject: Expected housing delivery: Bambers Lane, Whitehills

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Bambers Lane, Whitehills, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement gives presumed delivery of 0 in 2020-21, 15 homes in 2021-22, 30 in 2022-23, 30 in 2023-24 and 30 in 2024-25. (It is recognised that any delivery on the site will be dependent on the resolution of remaining issues with the planning application).

Please could you confirm whether this delivery rate accords with your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate whether you expect delivery on the site will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards



Eddie Graves

Principal Planning Officer (Policy)

t: 01253 658419

e: eddie.graves@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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Eddie Graves

From: Hayley Knight <hayleyknight@sat-plan.co.uk>
Sent: 26 May 2020 10:09
To: Eddie Graves
Cc: Rebecca Wasse; Michael Powell
Subject: RE: Expected housing delivery: Clifton House Farm

Good Morning Eddie,

Thanks for the below.

Due to the impact of Covid-19 on the house building industry, and requirements for offsite highway works which requires input and agreement from Lancashire County Council there will be a delay in delivery. We anticipate that delivery will therefore be as follows:

0 in 2020-21, 15 in 2021-22, 20 in 2022-23, 20 in 2023-24 and 20 in 2024-25 with 21 outside the 5 year period

Kind Regards
Hayley

Hayley Knight

Planning Director

M: 07989 327331 | E: hayleyknight@sat-plan.co.uk | W: www.sat-plan.co.uk



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From: Eddie Graves <eddie.graves@fylde.gov.uk>
Sent: 24 May 2020 09:52
To: Hayley Knight <hayleyknight@sat-plan.co.uk>
Subject: Expected housing delivery: Clifton House Farm

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at Clifton House Farm Warton, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Our records show that the site has planning permission for 96 homes.

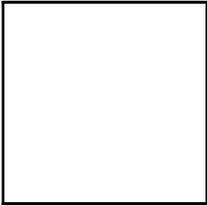
The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and further updated to reflect the latest planning consent, gives presumed delivery of 15 in 2020-21, 30 in 2021-22, 30 in 2022-23, 21 in 2023-24 and 0 in 2024-25.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period.

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards



Eddie Graves

Principal Planning Officer (Policy)

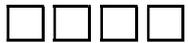
t: 01253 658419

e: eddie.graves@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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Eddie Graves

From: Jon Gould <Jon.Gould@rowland.co.uk>
Sent: 01 June 2020 13:58
To: Eddie Graves
Subject: Expected housing delivery: The Pastures, Wesham

Eddie,

We currently expect that the remaining properties on the development will be completed this year.

We did shut down for a few weeks but are back on site now working in a limited capacity but are not currently expect any extended hours' working.

Regards,

 Jon Gould
Design Manager
T: 01772 699452
M: 07711 371800
rowland.co.uk



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Company No. 02790915

Registered Office: Rowland Homes Limited, Farington House, Stanifield Business Park, Stanifield Lane, Leyland, Lancashire PR25 4UA

From: Eddie Graves <eddie.graves@fylde.gov.uk>
Sent: 24 May 2020 09:52
To: Jon Gould <Jon.Gould@rowland.co.uk>
Subject: Expected housing delivery: The Pastures, Wesham

Dear sir

We are contacting you to seek information on the expected delivery of housing on your site at The Pastures, Wesham, in order to inform the Council's Housing Land Supply Statement which is prepared annually in accordance with paragraph 9.19 of the Local Plan and with the National Planning Policy Framework.

Based on building control records, 211 homes have been delivered by 1st April 2020 at the site. This leaves 53 homes with planning permission.

The housing trajectory updated in last year's Five Year Housing Land Supply: Annual Position Statement, and allowing for last year's delivery, gives presumed delivery of 44 in 2020-21 and 9 in 2021-22.

Please could you confirm whether this delivery rate remains your expected rate of delivery, and if not, what your expected delivery for the site will be? In particular, could you please indicate how you expect housing completions will be affected by the COVID-19 lockdown period. Will extended hours' working be used to make up for any lost delivery?

Please could you respond by Thursday 4th June 2020. If no response is received, the Council will base its projections on the above delivery rate, and presume that this has your agreement.

Thank you in advance for your assistance.

Kind regards



Eddie Graves

Principal Planning Officer (Policy)

t: 01253 658419

e: eddie.graves@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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Annex 3

Consultation Material

Webpages:

Consultation page:

The screenshot shows a web browser window displaying the Fylde Council website. The page is titled "List of Consultations" and contains a table with the following data:

Title of Consultation	Start Date	End Date	Notes
Partial Review of the FLP3a	23/07/20	03/09/20 (9pm)	Please view this page .
Your views on Fylde's Town Centres	22/06/20		Feedback should be submitted via this link .
Five Year Housing Land Supply Draft Annual Position Statement 2020	15/05/20	02/07/20	Responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply - Annual Position Statement. For further information please see the Council's Five Year Housing Land Supply webpage here .

Five-year housing land supply page:

Five Year Housing Land Supply

See below for the consultation on the 2020 Draft APS

The Council has produced an Annual Position Statement (APS), setting out its five-year housing land supply, in line with paragraph 74 of the National Planning Policy Framework. The APS has been produced with engagement from developers and residents regarding expected delivery of new homes on sites. The APS was submitted to the Planning Inspectorate on 31st July

The original report produced by the Planning Inspectorate was quashed in the High Court on 1st April 2020. The Council made a legal challenge to the Inspector's report, because in it the Inspector stated that the required number of homes to be used for the calculation should be altered from that used in the adopted Local Plan. The government's lawyers agreed with the Council that the Inspector erred in law in using this different housing requirement. The government and the Council agreed a court order which quashed the report and ordered that it be sent back for reconsideration by the Planning Inspectorate. The court order quashing the earlier report can be viewed here: [Court order 1st April 2020](#).

The Planning Inspectorate has Issued a replacement report on 6th May 2020. The report confirms that the Council has a housing land supply equivalent to 5.1 years' supply of deliverable sites. The Inspector's Report can be found through the link

Inspector's Report on the Fylde APS

Five Year Housing Land X

https://www.fylde.gov.uk/resident/planning/planning-policy-local-plan/five-year-housing-land-supply

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Resident Business Council

Search for...

The APS incorporating the recommendations of the Inspector on site delivery, and including the Inspector's report, can be found through the link here: **Five-year housing land supply: Annual Position Statement**

The APS concludes that the Council has a 5-year housing land supply, for the purposes of decision-taking, until 31st October 2020.

Consultation

Draft Annual Position Statement for Base Date 1st April 2020

The Council has produced a Draft Annual Position Statement (APS), which sets out the sites which provide the Council's five-year housing land supply for the base date 1st April 2020. The Council is consulting on the document prior to submitting it to

Five Year Housing Land X

https://www.fylde.gov.uk/resident/planning/planning-policy-local-plan/five-year-housing-land-supply

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Resident Business Council

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year housing land supply for the base date 1st April 2020. The Council is consulting on the document prior to submitting it to the Secretary of State for his consideration. The document can be viewed via the link below:

Five Year Housing Land Supply Draft Annual Position Statement 2020

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

- The Council's overall methodology and assumptions, including lead-in times and build-out rates
- The Council's assessment of likely delivery on individual sites. The Council particularly wishes to hear from the owners/downers/developers of the sites included, in relation to delivery on their own sites.

File Year Housing Land

https://www.fylde.gov.uk/sites/default/files/2020-06/consultation/consultation-planing-policy-local-plan-five-year-housing-land-supply/

Suggested Sites Web Site Gallery

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 Resident Business Council

I want to search Fylde for...

landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to **planningpolicy@fylde.gov.uk** with the title Housing Land Supply – Annual Position Statement.

Responses must arrive by 5.00 pm on 2nd July 2020.

Eddie Graves

From: Sally Thompson
Sent: 11 June 2020 15:12
To: Sally Thompson
Subject: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

CONSULTATION – Housing Land Supply – Draft Annual Position Statement 2020

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which is available to view on the Council’s website click [here](#).

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

-
- The Council’s overall methodology and assumptions, including lead-in times and build-out rates;
- The Council’s assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

You are receiving this email because your details are on the Council’s Register of Consultees database, if your details have changed and/or you wish to be removed from the database please email planningpolicy@fylde.gov.uk

Kind regards
Planning Policy Team



Sally Thompson

Research and Information Officer- Planning Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

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www.fylde.gov.uk

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ADDRESS LINE 3
ADDRESS LINE 4
ADDRESS LINE 5
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ADDRESS LINE 7

Our Ref: 5YS APS

Your Ref:

Please Ask For: Julie Glaister

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 10 June 2020

Dear Sir/Madam

**Five Year Housing Land Supply
Draft Annual Position Statement**

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which has now been published for consultation on the Council’s website:

<https://new.fylde.gov.uk/council/consultation/>

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

- The Council’s overall methodology and assumptions, including lead-in times and build-out rates;
- The Council’s assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

Yours faithfully

Julie Glaister

Julie Glaister

Planning Policy Manager

Fylde Council

Public Consultation

Five Year Housing Land Supply: Draft Annual Position Statement

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which has now been published for consultation on the Council’s website:

<https://new.fylde.gov.uk/council/consultation/>

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

- The Council’s overall methodology and assumptions, including lead-in times and build-out rates;
- The Council’s assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

Mark Evans

Head of Planning and Housing

Annex 4

Responses to the consultation on the Draft APS

Eddie Graves

From: Hilton, Warren <Warren.Hilton@highwaysengland.co.uk>
Sent: 11 June 2020 17:04
To: PlanningPolicy
Subject: Housing Land Supply - Draft Annual Position Statement 2020

FAO: Planning Policy Team, Fylde Council

Highways England has no comments to make on the Fylde Council Annual Position Statement on housing delivery.

Please contact me if you would like to discuss anything about this email.

Kind regards,

Warren Hilton, Assistant Spatial Planner

Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD
Web: www.highwaysengland.co.uk.

From: Sally Thompson [<mailto:sally.thompson@fylde.gov.uk>]
Sent: 11 June 2020 15:12
To: Sally Thompson <sally.thompson@fylde.gov.uk>
Subject: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

CONSULTATION – Housing Land Supply – Draft Annual Position Statement 2020

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which is available to view on the Council’s website click [here](#).

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

-
- The Council’s overall methodology and assumptions, including lead-in times and build-out rates;
- The Council’s assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title

Housing Land

Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

You are receiving this email because your details are on the Council’s Register of Consultees database, if your details have changed and/or you wish to be removed from the database please email planningpolicy@fylde.gov.uk

Kind regards
Planning Policy Team



Sally Thompson

Research and Information Officer- Planning
Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

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Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ

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Eddie Graves

From: Sally Thompson
Sent: 17 June 2020 10:05
To: PlanningPolicy
Subject: FW: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

Response from MMO see email below x

From: SM-MMO-Consultations (MMO) <Consultations.MMO@marinemanagement.org.uk>
Sent: 11 June 2020 15:13
To: Sally Thompson <sally.thompson@fylde.gov.uk>
Subject: Automatic reply: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

Consultation response - PLEASE READ

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that would affect a protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean

high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). If you wish to contact your local marine planning officer you can find their details on our [gov.uk page](#).

See [this map on our website to locate](#) the 6 marine plan areas in England. For further information on how to apply the marine plans please visit our [Explore Marine Plans](#) service.

[The East Inshore and Offshore marine plans](#) were adopted on the 2nd April 2014, becoming a statutory consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.

[The South Inshore and Offshore marine plans](#) were adopted on the 17th July 2018, becoming a statutory consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon.

The [draft North East Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North East Inshore and Offshore marine plans cover the coast and seas from Flamborough Head to the Scottish border. [CONSULTATION OPEN UNTIL 20TH APRIL](#) 2020. This is the final stage of statutory public consultation before we submit the marine plan.

The [draft North West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The North West Inshore and Offshore marine plans cover the coast and seas from the Solway Firth border with Scotland to the River Dee border with Wales. [CONSULTATION OPEN UNTIL 20TH APRIL](#) 2020. This is the final stage of statutory public consultation before we submit the marine plan.

The [draft South East Inshore marine plan](#) was published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South East Marine plan covers the coast and seas from Felixstowe in Suffolk to near Folkestone in Kent. [CONSULTATION OPEN UNTIL 20TH APRIL](#) 2020. This is the final stage of statutory public consultation before we submit the marine plan.

The [draft South West Inshore and Offshore marine plans](#) were published on the 14th January 2020 becoming a material for consideration for public authorities with decision making functions. The South West Inshore and Offshore marine plans cover the coast and seas from the River Severn border with Wales to the River Dart in Devon. [CONSULTATION OPEN UNTIL 20TH APRIL](#) 2020. This is the final stage of statutory public consultation before we submit the marine plan.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England’s (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

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Sally Thompson

Research and Information Officer- Planning Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

Email Disclaimer



Eddie Graves

From: Knowles, Elizabeth <Elizabeth.Knowles@naturalengland.org.uk>
Sent: 18 June 2020 15:13
To: PlanningPolicy
Subject: RE: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

Thank you for your consultation.

We have reviewed the Five Year Housing Land Supply Annual Position Statement Base date 1st April 2019 (May 2020) and Natural England has no comments to make.

Elizabeth Knowles
Lead Advisor, Planning Casework
Coast and Marine Team
Cheshire, Grtr Manchester, Merseyside & Lancashire Area Team
Natural England
Tel: 0208 225 7506

www.gov.uk/natural-england

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2nd Floor, Arndale House
Manchester, M4 3AQ

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay alert, control the virus, save lives.



From: Sally Thompson [<mailto:sally.thompson@fylde.gov.uk>]
Sent: 11 June 2020 15:12
To: Sally Thompson <sally.thompson@fylde.gov.uk>
Subject: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

CONSULTATION – Housing Land Supply – Draft Annual Position Statement 2020

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which is available to view on the Council's website click [here](#).

The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

-
- The Council's overall methodology and assumptions, including lead-in times and build-out rates;
- The Council's assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

You are receiving this email because your details are on the Council's Register of Consultees database, if your details have changed and/or you wish to be removed from the database please email planningpolicy@fylde.gov.uk

Kind regards
Planning Policy Team



Sally Thompson

Research and Information Officer- Planning Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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BY EMAIL: planningpolicy@fylde.gov.uk

Our ref:

Your ref:

Date: 30 June 2020

Dear Sirs,

CONSULTATION: Fylde Housing Land Supply – Draft Annual Position Statement 2020

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

E. Hrycan

Emily Hrycan

Historic Environment Planning Adviser (North West)

Historic England

Telephone: 0161 242 1423

e-mail: emily.hrycan@HistoricEngland.org.uk



Eddie Graves

From: Tim Bettany-Simmons <Tim.Bettany-Simmons@canalrivertrust.org.uk>
Sent: 01 July 2020 08:47
To: PlanningPolicy
Subject: RE: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

Dear Sir/Madam

Thank you for your consultation. The Canal & River Trust have reviewed the details and have no comments to make.

Kind regards

Tim Bettany-Simmons BA (HONS), MSc, MRTPI
Area Planner & Special Projects / Cynlluniwr Ardal & Prosiectau Arbennig

M 07342 057926
E Tim.Bettany-Simmons@canalrivertrust.org.uk
W www.canalrivertrust.org.uk

Canal & River Trust / Glandwr Cymru,
Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP

From: Sally Thompson <sally.thompson@fylde.gov.uk>
Sent: 11 June 2020 15:12
To: Sally Thompson <sally.thompson@fylde.gov.uk>
Subject: CONSULTATION - Housing Land Supply - Draft Annual Position Statement 2020

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CONSULTATION – Housing Land Supply – Draft Annual Position Statement 2020

The Council is required to produce a Housing Land Supply Statement annually in accordance with the adopted Fylde Local Plan to 2032. The Council must identify a five-year supply of deliverable housing sites to meet the requirements of the National Planning Policy Framework (2019). Councils may “fix” their five-year housing land supply position for the year by producing an Annual Position Statement which has been subject to consultation, and which is then submitted to the Secretary of State for ratification.

Fylde Council has produced a Draft Annual Position Statement for the base date 1st April 2020 which is available to view on the Council’s website click [here](#).

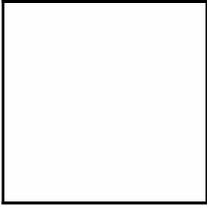
The Council welcomes comments from stakeholders and other interested parties on the information contained within this document, including:

-
- The Council’s overall methodology and assumptions, including lead-in times and build-out rates;
- The Council’s assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).

Respondents should make clear which part of the document is being referred to in their response, by the reference to page numbers and individual site references where applicable. All consultation responses should be sent by email to planningpolicy@fylde.gov.uk with the title Housing Land Supply – Annual Position Statement. Responses must arrive by 5.00 pm on 2nd July 2020.

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Kind regards
Planning Policy Team



Sally Thompson

Research and Information Officer- Planning Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

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Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

Cefnogwch ni ar <https://www.facebook.com/canalrivertrust>

Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>

Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestrdig 1146792. Swyddfa gofrestrdig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.



Homes
England

Fylde Council
Planning Policy
St David's Road North
Lytham St Annes
FY8 2JS

2nd July 2020

Dear Sir / Madam,

Consultation on Housing Land Supply – Draft Annual Position Statement

Homes England Response

I would firstly like to thank you for the opportunity to comment on the Housing Land Supply – Draft Annual Position Statement.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make any representations at this point. We will however continue to engage with you as appropriate.

Yours faithfully,

P.P. Nicola Elsworth
Head of Planning and Enabling
Homes England
Nicola.Elsworth@homesengland.gov.uk

Homes England
1st Floor Churchgate House
56 Oxford Street
Manchester
M1 6EU

0300 1234 500
www.gov.uk/homes-england

Eddie Graves

From: Alban Cassidy <AlbanCassidy@cassidyashton.co.uk>
Sent: 01 July 2020 16:55
To: PlanningPolicy
Subject: Housing Land Supply - Annual Position Statement

To whom it may concern

I represent various landowners in the Fylde area.

The consultation process for the Annual Position Statement could not have been held at a more inconvenient time. With the current pandemic the collation of information and more significantly, future predictions are almost impossible to undertake in a comprehensive and accurate manner.

It is acknowledged that the Council has attempted to make predictions and has given its own opinion as to why the pandemic won't have a significant impact upon the delivery of housing in Fylde but as they acknowledge no accurate prediction can be made at this stage. However it is noted that reference is made to extended working hours and commercial imperatives which may encourage developers to make up for lost delivery over a period, which is unlikely to exceed five years.

However this does not allow for the economic impact of COVID-19 on the overall housing market, with the only reference being that:

"... it is much too early to make any assessment and it cannot be justified to make a revision to housing delivery via a blanket approach on the basis of macro-economic outlook and its impact on overall housing demand at this stage. It should be noted that at the base date 1st April 2020, one week into the lockdown, no rational analysis of the position was possible."

Whilst this position is not disputed it is clear that the only rational approach is therefore to err on the side of caution. The country is currently facing its worst economic crash in generations and this is clearly going to have an impact upon the delivery of housing as was evidenced by the impact of the last economic crash in the late 2,000's.

A bullish approach of just carrying on is not appropriate in the circumstances.

Turning to the individual sites, I repeat the difficulties in obtaining a comprehensive picture but what is evident is the continuing slowdown of delivery at the Queensway site and the impact that this may have upon the delivery of the Lytham Moss link road which itself is vital to the economic growth of the borough. Even the much reduced contribution from this site is over optimistic in the present circumstances and its contribution should be taken out of the calculations for now.

In respect to other sites it would only be sensible to allow for a reduction in delivery of 10-20% on average to allow for the impact of the pandemic and the economic crash that is accepted as being inevitable.

A more robust calculation of the Borough's housing land supply should take these factors into account.

Regards

Alban Cassidy

Alban Cassidy BA (Hons) Cert. Ecol. MSc MIEMA MRTPI C.Env
Director
Chartered Town Planner and Environmental Consultant



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Lancashire
FY8 1LW

VIA EMAIL ONLY: planningpolicy@fylde.gov.uk

1317/HW/DM

2nd July 2020

Dear Sir/Madam,

RE: FIVE YEAR HOUSING LAND SUPPLY –DRAFT ANNUAL POSITION STATEMENT 2020

We write on behalf of our Client, Mr Tom Rowe, in response to the Five Year Housing Land Supply Draft Annual Position Statement ('APS') published for consultation by Fylde Council ('the Council') in June 2020.

The APS seeks to confirm the Council's five year housing land supply position at the base date 1st April 2020. It follows the adoption of the 2019 APS which concludes that the Council has a five year housing land supply for the purpose of decision-taking until 31st October 2020.

The Council is welcoming comments from stakeholders and interested parties on the proposed methodology and assumptions (including lead-in times and build-out rates) set out in the Draft APS and the assessment of likely delivery of individual sites. The Council will then review the responses and update their APS before submitting it to the Secretary of State for his consideration.

Our Client owns two sites identified as part of the land supply set out in the trajectory at Appendix 1 of the Draft APS. This includes Land north of Mill Lane, Elswick (reference HS72 and HLAS reference 4A1140) and Land north of Beech Road, Elswick (reference HS73 and HLAS reference 4A1141). An extract from the adopted Fylde Local Plan Proposals Map showing the location of each site is enclosed with this letter.

From the outset, our Client supports the Council's proactive approach to progressing the APS. The purpose of these representations is to confirm the deliverability of the sites within the control of our Client. We do not intend to critique the methodology and assumptions set out in the APS as part of our representations.

The following section sets out the planning policy context for assessing the deliverability of sites.

Planning Policy Context

The revised National Planning Policy Framework (NPPF) was published by the government in June 2019. It sets out the planning policies for England and how they are expected to be applied.



Registered in England
Number: 00342872

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Registered Office:
The Blade
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Reading
RG1 1BE
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Section 5 sets the framework for delivering a sufficient supply of homes.

Paragraph 73 of the NPPF requires local planning authorities to identify and update annual a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer of 5%, 10% or 20% depending on the local planning authority's circumstances.

The glossary at Appendix 2 of the NPPF defines 'deliverable' as follows:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

The NPPF is supported by the National Planning Practice Guidance (NPPG). The 'housing supply and delivery' chapter sets out guidance on the provision on five year housing land supply and the housing delivery test. Paragraph 007 reiterates the definition of deliverable set out at Annex 2 of the NPPF. For major sites with outline planning permission it states robust evidence must be provided to demonstrate deliverability. Such evidence to demonstrate deliverability may include:

- Current planning status – How much progress has been made towards approving reserved matters.
- Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and developer which confirms the developer's delivery intentions and anticipated start and build-out rates.
- Firm progress with site assessment work.
- Clear relevant information about site viability, ownership constraints or infrastructure provision.

The following sections of our representations set out how our Client's land interests in Elswick meet the definition of deliverable set out in the NPPF and NPPG and should, therefore, be included as part of the Council's five year housing land supply in accordance with paragraph 73 of the NPPF.

Land north of Mill Lane, Elswick (Ref: HS72)

Our Client owns a parcel of land located to the north of Mill Lane and to the south of Bonds Lane in Elswick. The Site extends to 4.7ha and comprises flat open farmland, with a large pond in the centre. The Site is relatively rectangular in appearance and is bound by trees and hedgerows.

To be considered deliverable in accordance with the NPPF, sites identified for housing within the APS should be available, suitable and have a realistic prospect of housing being delivered within a five-year period. We set out how the Site meets each of these elements in further detail below.

Availability

The Site is within the ownership of our Client and is available for development now. The land is not subject to any restrictive covenants that would prevent the Site from being developed for housing and there are no current uses on the Site that need to be relocated to allow development to occur. The Site should, therefore, be considered available for housing in the next five years.

Suitability

The Site sits within the settlement boundary of Elswick, identified as a sustainable location for housing growth within the adopted Fylde Local Plan to 2032. The Site is free from physical constraints and there are no specific landscape, ecological or heritage designations which would impact upon the suitability of the Site for the housing.

Outline planning permission (LPA ref. 16/0180) for a residential development of up to 50 dwellings and associated infrastructure was granted on 28th November 2017. An application for approval of reserved matters pursuant to outline planning permission 16/0180 for the layout, scale, appearance, and landscaping for the development of 50 dwellings with associated open space and infrastructure was subsequently approved on 12th October 2018 (LPA ref. 18/0318). Upon the grant of outline planning permission, the Site was allocated for the development of circa. 50 dwellings in the adopted Fylde Local Plan to 2032.

Although the Site is yet to be developed, the extant planning permission and its allocation in the Fylde Local Plan demonstrates that the Site is suitable for residential development now and is free from any physical or technical constraints that would prohibit its developments. In this context, the Site should be considered suitable to accommodate housing in the next five years.

Deliverability

As set out above, the Site benefits from outline planning permission and reserved matters approval for the development of 50 dwellings (LPA ref. 16/0180 and 18/0318). Condition 1 of outline permission 16/0180 requires:

Applications for approval of reserved matters must be made no later than the expiration of three years from the date of this permission and the development must be begun no later than:

- *The expiration of three years from the date of this permission (28th November 2020); or,*
- *Two years from the date of approval of the last of the reserved matters to be approved (10th October 2020), whichever is the later.*

Story Homes, the applicant for both applications, is no longer proposing to develop the Site. However, the Site still benefits from an extant outline planning permission that can be implemented by another housebuilder or developer.

The NPPF and NPPG requires sites with outline planning permission for major development to provide clear evidence that housing completions will begin on site within five years.

We can confirm that our Client has been in discussions with another housebuilder to submit a fresh application for reserved matters on the Site. However, progress on the application has stalled in recent months due to the uncertainties in the market surrounding the impact of the COVID19 pandemic. This means approval of reserved matters is unlikely to be achievable before 28th November 2020 in accordance with condition 1 of the outline consent.

The economic impacts of the COVID19 pandemic on the deliverability of sites and the housing market is acknowledged within the Draft APS. In response to concerns from the development industry the Rt. Hon. Alok Sharma MP led the Business and Planning Bill before Parliament on 25th June 2020. The Bill will extend the lifetime of all planning permissions due to expire from the start of lockdown on

23rd March 2020 until the end of this year to 1st April 2021. The Bill will come into force 28 days after it is passed by Parliament.

The introduction of the Business and Planning Bill will extend the lifetime of the extant outline planning permission until 1st April 2021 and would allow further time for the interested housebuilder to gain reserved matters approval. It is understood from our Client that the interested party intends to submit a reserved matters application in Autumn/Winter 2020 to ensure it is approved prior to the planning permission expiring. Conditions will be discharged in the early part of 2021 with works expected to start on site in Spring/Summer 2021.

Set in this context, the housing trajectory at Appendix 1 of the APS should be amended as follows:

Year 1 2020/21: 0
Year 2 2021/22: 15
Year 3 2022/23: 30
Year 4 2023/24: 5
Year 5 2024/25: 0

To summarise, the Site benefits from outline planning permission and our Client has confirmed that a reserved matters application will be submitted and approved prior to the permission expiring on 1st April 2021 with works expected to start on site in Spring/Summer 2021. The Site should, therefore, be considered deliverable for housing in the next five years in accordance with paragraph 73 of the NPPF.

Land north of Beech Road, Elswick (Ref: HS73)

Our Client owns a parcel of land located to the north of Beech Road in Elswick. The Site is irregular in shape and comprises 2.6ha of flat open farmland bound by trees and hedgerows to the north and east, Beech Road to the south and residential development on Beech Road to the west.

To be considered deliverable in accordance with the NPPF, sites identified for housing within the APS should be available, suitable and have a realistic prospect of housing being delivered within a five-year period. We set out how the Site meets each of these elements in further detail below.

Availability

Like the Site above, this Site is also within the ownership of our Client and is available for development now. The land is not subject to any restrictive covenants that would prevent the Site from being developed for housing. Although there are agricultural buildings on the Site they are not in active use and the principle of demolishing them has been accepted through planning permission reference 16/0645. The Site should, therefore, be considered available for housing in the next five years.

Suitability

The Site sits within the settlement boundary of Elswick, identified as a sustainable location for housing growth within the adopted Fylde Local Plan to 2032. Again, the Site is free from physical constraints and there are no specific landscape, ecological or heritage designations which would impact upon the suitability of the Site for the housing.

Planning permission (LPA ref. 16/0645) for the erection of 50 dwellings to be accessed from Beech Road with associated landscaping, pumping station and electricity sub-station following the demolition of existing agricultural buildings was granted on 28th November 2017. Upon the grant of planning permission, the Site was allocated for the development of 50 dwellings in the adopted Fylde Local Plan to 2032.

A variation of condition application to allow for the substitution of the approved house types across the Site was submitted by Kingswood Homes on 28th February 2020 (ref. 20/0168). This application is currently pending determination. However, an updated materials schedule and site plan was

submitted in support of the application on 9th June 2020. This demonstrates Kingwood Homes commitment towards the positive determination of the application.

Although the Site is yet to be developed, the extant planning permission and its allocation in the Fylde Local Plan to 2032 demonstrates that the Site is suitable for residential development now and is free from any physical or technical constraints that would prohibit development. In this context, the Site should be considered suitable to accommodate housing in the next five years.

Deliverability

The NPPF states sites which involve major development and have detailed planning permission should be considered deliverable until the permission expires unless there is clear evidence that homes will not be delivered within five years.

As set out above, the Site benefits from planning permission for the development of 50 dwellings (LPA ref. 16/0645). Condition 1 of planning permission reference 16/0180 requires the development permitted to begin no later than 3 years from the date of the decision (effectively the 28th November 2020).

Like the Site at Mill Lane, the introduction of the Business and Planning Bill will extend the lifetime of the extant planning permission until 1st April 2021. Kingswood Homes has a pending application to vary the house types approved as part of this planning permission (LPA ref. 20/0168) which demonstrates their commitment towards achieving planning permission and delivering development on the Site.

Our Client has confirmed that this application is expected to be determined within the next two months and subject to approval the conditions will be discharged autumn/winter 2020 with works expected to start on site in early 2021. Set in this context, the housing trajectory at Appendix 1 of the APS for this Site is correct.

To summarise, the Site benefits from planning permission and the Site will be delivered by Kingswood Homes who have a pending application to vary the house types approved as part of the original planning permission. The Site should, therefore, be considered deliverable for housing in the next five years in accordance with paragraph 73 of the NPPF.

Conclusions

We welcome the opportunity to comment on the Five Year Housing Land Supply Draft APS and to provide an update on our Clients land interest at Mill Lane and Beech Road in Elswick.

In summary, we have demonstrated that both sites meet the definition of '*deliverable*' set out within the NPPF and NPPG and should, therefore, be included as part of the Council's five year housing land supply.

We trust you will take these comments into consideration, and we would welcome the opportunity to engage further with the Council on these matters.

Yours faithfully

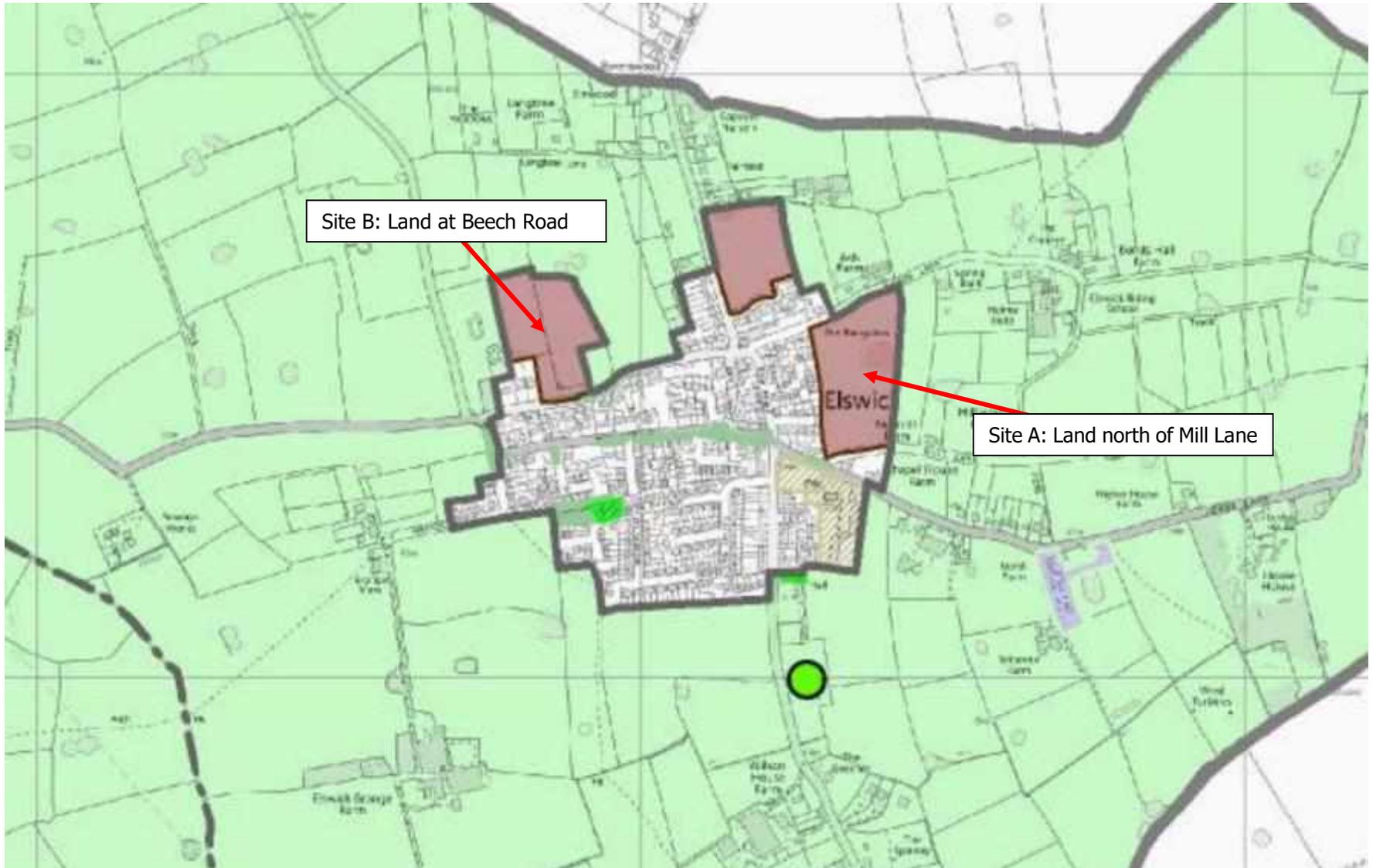
HANNAH WALKER

Planning Associate

Encl.

Extract of the adopted Fylde Local Plan Proposals Map

FYLDE LOCAL PLAN PROPOSALS MAP EXTRACT





Draft Annual Position Statement 2020

Response Statement

Hollins Strategic Land
July 2020

1 Introduction

- 1.1 This Response Statement (RS) relates to the Council's Draft Annual Position Statement (dAPS) and focusses on providing information on sites which Hollins Strategic Land have an interest in.
- 1.2 HSL provides information on three sites to demonstrate that the supply should be reduced.
- 1.3 Of the three sites, two have unfortunately been significantly impacted by the COVID pandemic. The dAPS acknowledges the pandemic must take more account of its impact on housing delivery across Fylde by reducing delivery rates.

2 Land off Woodlands Close, Newton with Scales (ref: HS70)

2.1 The dAPS states that this site (ref: HS70) will deliver as follows:

2020/21	25
2021/22	19
2022/23	0
2023/24	0

2.2 HSL secured outline permission for this site and Hollins Homes (HH) (sister company to HSL) secured reserved matters approval and is developing the site. HH has stated that the impact of COVID has slowed down the build progress this year and will continue to affect it with new measures having to be adhered to.

2.3 HH has also stated that no housebuilders are selling well in the area at present and many of the reservations that have been taken are subject to the purchasers selling their own house. This chain creates uncertainty. COVID-19 and the surrounding job uncertainty has also led to viewers holding-off committing to a purchase.

2.4 The delivery rate is therefore expected to be as follows:

2020/21	19
2021/22	20
2022/23	10
2023/24	0
2024/25	0

2.5 It is acknowledged that this reduction in delivery/annum would not impact on the overall five year housing land supply. It does however demonstrate the impact of the COVID-19 pandemic. While it is too early to know the full effects, it is evident that it has slowed down delivery during 2020/21 and 2021/22 at site HS70.

3 Land at Brook Farm, Dowbridge, Kirkham (HS57)

3.1 The dAPS states that this site (ref: HS57) will deliver as follows:

2019/20	30
2020/21	30
2021/22	30
2022/23	30
2023/24	30

3.2 HSL achieved outline permission on this site, Story Homes (SH) secured Reserved Matters Approval and development is underway.

3.3 However, as confirmed in the HSL Statement on the 2019 AMR, SH had stated that the site would deliver a maximum of 30 dwellings per annum (dpa). That, of course, did not take account of the COVID pandemic.

3.4 HSL was not able to obtain the views of SH on this site; a number of staff are on furlough leave due to the COVID-19 pandemic. However, site HS57 is in close proximity to HS70 and HH has stated that the SH build delivery rate has also been affected by the COVID-19 pandemic; it is estimated that it could reduce to 25 dpa for 2020/21 and 2021/22.

3.5 The delivery rate is therefore expected to be as follows:

2020/21	25
2021/22	25
2022/23	30
2023/24	30
2024/25	30

4 Land north of Freckleton Bypass, Warton (HSS12)

4.1 The dAPS states that this site (ref: HSS12) will deliver as follows:

2020/21	0
2021/22	30
2022/23	30
2023/24	30
2024/25	30

4.2 HSL did not secure outline permission on this site but does have an interest in the land. An application for the approval of reserved matters was submitted by Countryside in January 2020 but remains pending nearly 6 months later.

4.3 HSL is aware that there are significant unresolved issues with the application proposals which are proving difficult to overcome for the applicant. The Fylde Council Development Management department will be able to confirm this. Indeed, the DM Officer has stated that *“there is no realistic prospect for these issues to be addressed comprehensively without a relatively sizeable reduction in the number of dwellings being proposed”*. There can be no certainty that the RM proposals will be approved.

4.4 Indeed, at this stage, it is possible that the RM application could be withdrawn given the LPAs request for a sizeable reduction in the number of dwellings. If this does occur, it must be noted that the outline consent will have expired. As such, any developer would need to obtain a new outline permission and then RM approval or a full planning permission. While the site is an allocation, this would undoubtedly result in the site not being deliverable at this point in time.

4.5 It is therefore considered that this site should not be included in the five-year supply at present.

4.6 Should the Inspectorate deem otherwise on the basis of it being sufficient that a RM application is pending and could be approved if the significant issues can be overcome, it is considered that the delivery rates should not exceed the following:

2020/21	0
2021/22	10
2022/23	30
2023/24	30
2024/25	30

- 4.7 If the RM application is not withdrawn, it will not be approved until the Autumn at the earliest. A number of pre-commencement conditions will need to be discharged and there is significant upfront infrastructure to be provided, which the LPA is fully aware of. As such, it highly unlikely that any significant number of dwellings would be delivered in 2020/21.

5 COVID pandemic

- 5.1 Unfortunately, the dAPS must take more account of the impact of COVID-19. In a recent appeal decision (Ref: 3238048), an Inspector confirmed that the virus would impact on housing land supply. It is of course too early to ascertain the full extent of the impact, but many development sites across the country came to a standstill, including those associated with Hollins Strategic Land's sister company, Hollins Homes.
- 5.2 Work has now recommenced on Hollins Homes sites, but it will take several months to deliver the rate of development that was achieved before Lockdown. As HH stated with regard HS70 it is likely that the knock on effects will continue well into 2021/22.
- 5.3 Delays on current Hollins Homes development sites will also likely result in knock-on delays at other sites awaiting commencement of development. For example, it is anticipated that employees/contractors who have been working at Hollins Homes' site in Fylde would move onto a site Galgate site in due course. The Fylde site has stalled as a result of Lockdown and so it will now take longer for those workers to relocate to Galgate. This would likely be the case for developers who are currently operating in Fylde and have another Fylde site to move onto.
- 5.4 Furthermore, both Hollins Strategic Land and Hollins Homes have experienced delays in progressing planning/reserved matters/discharge of condition applications since Lockdown began. It has, for example, proved challenging to progress an application for outline permission in neighbouring Wyre because of the implications of Lockdown on Members meetings. Making efficient progress on a Reserved Matters application in Lancaster has also been challenging as a result of government restrictions and companies furloughing staff. It has also proved challenging to progress an application to discharge conditions on site HS70 due to Lancashire County Council officers being redeployed in some circumstances. The delays will subsequently impact on each site, through no fault of the LPA. It is to be expected that other developers/housebuilders will have faced similar issues.
- 5.5 Moreover, a number of housebuilders had to Furlough the majority of Planning/Land staff. Planning consultancies and other disciplines associated with the planning process have had to do the same. This will undoubtedly cause delays across the board, which in turn, will impact on delivery rates.
- 5.6 As well as impacting regional housebuilders such as Hollins Homes, the Lockdown will have impacted on builders of all scales, from national to local level. It also remains to

be seen how the economic impact will affect the delivery of small sites. The Council may need to review its delivery rate in this regard, at least for the next year.

- 5.7 HSL has sites in Oxfordshire. The Oxfordshire Growth Board Director issued a statement on the impact of COVID-19¹ and the majority of its content would be equally applicable to Fylde. It demonstrates that the pandemic will cause significant delays in the delivery of housing, both market and affordable. It is considered that Fylde must undertake a similar statement to inform its APS; the absence of such evidence base work would result in an APS that is not robust.

¹ Appendix 1: Oxfordshire Growth Board report

6 Conclusions

6.1 This RS has demonstrated that:

- Delivery rates should be amended for sites HSS12, HS70 and HS57;
- The impact of the COVID-19 pandemic must be fully acknowledged by the Council and delivery rates should be reduced, particularly in circumstances where the Council has not been provided with evidence to the contrary by developers.

6.2 As a result, it is considered that significant amendments are required to the dAPS and it is possible that the Council will not be able to demonstrate the required five year supply as a result.

6.3 HSL would welcome the opportunity to engage with the LPA on the matter of HLS.

Appendix 1



To: Oxfordshire Growth Board

Title of Report: Impact of the COVID-19 Pandemic on the Oxfordshire Housing and Growth Deal

Date: 2 June 2020

Report of: Bev Hindle, Growth Board Director

Status: Open

Executive Summary and Purpose:
 The purpose of this report is to update the Growth Board on the early impact that the COVID-19 pandemic has had on the delivery of the Oxfordshire Housing and Growth Deal, including a recommendation to revise the Oxfordshire Plan 2050 Timeline. Officers will continue to monitor impact, reporting to future Growth Board meetings any actions necessary to mitigate impact over time. This report will be considered by a virtual online meeting of the Growth Board as a result of the recommended social distancing measures.

Recommendations:
 That the Growth Board:

1. Notes the early impact of the COVID-19 Pandemic on the delivery of the Oxfordshire Housing and Growth Deal, and in considering this;
2. Endorses a revised timeline for the Oxfordshire Plan 2050, as set out in this report, for officers to take forward in discussion with MHCLG.

Introduction

1. As the first deal of its kind, the Oxfordshire Housing and Growth Deal (‘the Deal’) was successful in securing £215m of Central Government investment to advance housing delivery and boost economic productivity in the area. Within the deal are four distinct workstreams.
2. The Homes from Infrastructure Programme (Hfi) within the Deal is a £150m investment in infrastructure to support the acceleration of already planned housing in Oxfordshire over a five-year period from 2018/19 to 2022/23. The Infrastructure projects include road, rail, cycle routes and footpaths, as well as social infrastructure such as schools. Similarly, The Affordable Housing Programme is a £60 Million investment over three years to support the delivery of at least 1322 additional affordable homes, using a range of tenures including social rent, affordable rent, shared ownership by March 2021.

3. Through the Deal, the Oxfordshire authorities agreed to develop a county wide Strategic Development Plan, known as the Oxfordshire Plan 2050, to support a more coordinated approach to long term spatial planning across the County. This is supported by additional time limited planning freedoms and flexibilities for local authorities to protect against unplanned development.
4. The fourth workstream within the Deal is Productivity which sits alongside the other work streams, led by the Oxfordshire Local Enterprise Partnership (OxLEP). At the centre of this work is an ambitious Local Industrial Strategy for Oxfordshire. It is the role of the Oxfordshire Growth Board to oversee and monitor delivery of the Deal and its workstreams.
5. The COVID-19 pandemic has had an unprecedented impact on populations globally, nationally and locally. Each of the Oxfordshire Councils are investing significant resources into managing local response efforts. This report however focusses on the impact that the pandemic is having on local delivery against the Deal programme; specifically, the Housing delivery, Infrastructure, Oxfordshire Plan 2050 and Productivity workstreams.
6. It is critical to note that this report provides an update on the early impacts of the pandemic only, and secondly that the fast-changing nature of the situation may render many comments in this paper out of date soon after publication. Forthcoming quarterly progress reports will reflect on the impact of COVID-19 and the actions taken in response on an ongoing basis as necessary.

Impact of COVID-19 on the Oxfordshire Housing and Growth Deal and the Housing Market

7. Prior to the COVID crisis, a picture was emerging in Oxfordshire of a housing market delivery trajectory that was slipping due to issues such as local plan delays and the beginnings of weakening developer confidence in certain areas of the Oxfordshire housing market. Within that overall picture however those sites that were supported by the Housing and Growth Deal through infrastructure investment were generally maintaining their delivery trajectory, partly because the infrastructure investment supported developer confidence and because these sites are the ones with the most robust demand profile and could withstand market movements more robustly.
8. Nationally, it is estimated that around 75% of housing sites closed due to the COVID crisis.¹ In Oxfordshire, all the major sites halted production because of COVID-19 and are now returning to work (May 2020). However, there will be on-site working practice restrictions in place that are likely to mean full productivity will not be possible whilst staff and contractors adapt to this new working environment. Some of the smaller development sites in Oxfordshire did not close, but capacity was limited as contractors were isolating or ill.

¹ Building.co.uk. 2019: Available at: <https://www.building.co.uk/news/coronavirus-stops-work-at-75-of-uk-housing-schemes/5105579.article>

9. There is also an issue of supply chains drying up and putting workers onto the Furlough Scheme, affecting the ability to develop.² However, there is evidence that these firms are also returning to work. In April for example, a major brickmaker Mickelmersh announced they would be returning to work.
10. Costs of construction will also be an issue affected by COVID-19. The market was already experiencing an increase in labour costs due to the effects of Brexit and this may well be compounded by the crisis. Coupled with the point made above that developers will not be able to run sites at full capacity due to the need for physical distancing, this will therefore impact upon the efficiency of sites and therefore costs.
11. Because of the slowdown, councils can expect housing delivery trajectories, both Deal related and more generally to be impacted. At the time of writing this report however officers have yet to complete the revised delivery trajectories for either Housing from Infrastructure or the Affordable Housing Programme. The former is being completed by partners and is expected to be available from late June, whilst the latter is being completed to an agreed deadline of the end of May.
12. Outside of the market slowdown, an added delay reported is the interruption to the planning process. Developers advise that where schemes are in feasibility stages work is progressing, but where either a consultation or decision point has been reached delays are inevitably occurring, although this is now reducing as an issue.
13. Looking to the longer-term impact on the housing market outside of the Deal timeframe market intelligence from Savills suggests that the housing market could see a 50% dip in activity in this financial year with the sharpest dip being in the second quarter. This is important because of the strong link between market activity (demand) and house prices. Accordingly, Savills suggest that house prices could fall as much as 10%, although they conclude it is too early to say whether the market will then re-adjust, or this will be a longer-term reduction.
14. Council partners will be aware of the government advice to councils to consider allowing SME developers to delay S106 commitments in a bid to support them through the crisis. For affordable housing this could take the form of either re-phasing or perhaps pressure to reduce the obligations, perhaps by remodelling or grant funding from government. This government advice has the potential to materially impact both the Deal and councils own affordable housing delivery trajectories as S106 accounted for 49% of all affordable housing delivered in 2018/19.
15. Developers will be concerned about any trend of slowing market housing activity and in particular shared ownership sales, which is seen as a softer market and more prone to economic cycles. This is because often the shared ownership client is usually on a lower quartile income for home ownership and the concern is that some of the potential purchasers may have had to use their

² Inside Housing, 2020. Available at: <https://www.insidehousing.co.uk/news/news/housing-associations-warn-supply-chain-failures-caused-by-covid-19-could-hurt-development-plans-66156>

deposit savings for other needs, whilst others may not be able to access mortgages now due to a change of employment situation.

16. Developers have advised that the attitudes of banks will be central to their future performance as they rely upon loan funding for their development activities, funded from sale receipts. This is especially true if the sales market does not pick up as loan finance is often secured against built stock. There is for example already some evidence that finance against shared ownership is being temporarily stopped by some lenders
17. In terms of the role of the Housing and Growth Deal, the Board will be aware that current Deal finance restricts expenditure to either infrastructure that accelerates planned housing or grant for additional affordable housing. Post COVID however there is perhaps a wider role for the Deal in enabling sites that have stalled to progress, thus accelerating housing that would otherwise have stalled. A discussion about this wider role for the Deal will be an ask of Government as we discuss how the Deal can aid recovery in the housing market.
18. Within this overall housing development picture, the Housing and Growth Deal Affordable Housing Programme (OAHP) has inevitably slowed. The Board will be aware that the programme was experiencing challenges in the second year and these challenges have been exacerbated by the COVID crisis. The immediate impact was that a proportion of the schemes that were programmed to reach the relevant milestone to qualify for grant at the end of year two failed at the last minute as staff were off sick or contractors were not available. There were also several schemes where the COVID crisis led the Registered Provider of social housing (RP) concerned to reflect upon whether their development contract and the penalties it contained for exceeding costs or timescales is one they could sign up to.
19. These last minute delays could have reduced the grant payment from government; fortunately it was agreed with MHCLG that all the schemes that had been programmed for year two would have the grant paid over to OCC as the accountable body and that grant then passed on to the relevant district council for payment to the RP when the payment milestone was achieved.
20. Looking at the impact of the COVID crisis on the OAHP moving forward, feedback from RPs on the Oxfordshire affordable housing market is that they are typically building a 6-9-month delay into their initial revisions of development business plans (as of April 2020) but sense these could be optimistic assessments. RPs also expect pressure for contracts to be renegotiated to reflect expected increased costs, force majeure claims and a perceived inability to accept compensation clauses for delay.
21. Whilst also being developers, and therefore subject to the pressures other developers face, RPs have a strong financial position due to their asset base and rental income to support that. They recognise that this position and their ability to access government grant means they can play a crucial role in housing market recovery. For example, by land purchase from developers as a recovery tool to ease developer cash flow. This could be just holding an option

on the land for developer buyback or it could be a tool for a greater intervention in the housing market with subsequent development by the RP.

22. There is also a potential role for the OAHP in driving recovery in the final years of the programme, for example by working with RPs and local authority development companies to:
 - Assist with developer cash flow issues caused by slow market sales through the bulk purchase of units. These units would then be converted to affordable rented housing using OAHP grant. This is a proven method of assisting the market that was successful in the last housing market slump in 2009;
 - Converting shared ownership properties to affordable or social rented housing using OAHP grant funding. At present this is not permitted by the OAHP but will be an ask of government as we discuss how the Deal can assist in the housing market recovery.
23. It is important that the potential of the OAHP to assist with housing recovery is maximised in the final year of the programme and officers are discussing with Homes England revised terms for the OAHP to enable that to happen. The OAHP will need to reflect the new Oxfordshire housing market in these discussions, for example by the potential to grant fund social rented housing at lower rents to address issues of affordability for local people that will be brought into sharper focus by any economic downturn.

The impact of COVID 19 on Infrastructure delivery in Oxfordshire

24. The unprecedented circumstances present a challenge at the time of writing to say with any certainty what the overall impact of COVID-19 will be on infrastructure delivery related to the Housing and Growth Deal. This programme is delivered through Oxfordshire County Council's Capital Delivery Programme and much of its infrastructure programme will be impacted in the same way. There is no precedent to help understand what the potential future impacts are, coupled with limited information available on when restrictions may end and the details of future working arrangements (as of May 2020). There are also major questions being asked of the need and demand for particular infrastructure projects planned before COVID-19 e.g. national push for more cycle infrastructure.
25. A more granular understanding of the impacts will be developed over the coming months. However, what is clear now is that staff are continuing to work but in a very different way. Where schemes are in design, work has continued where possible and the impact is not thought to be significant. Site visits are expected to have been impacted, and where surveys are required, it is expected that there will have been an impact on the programme, and some surveys being seasonal this could have a significant impact. Schemes in construction are also expected to be impacted by the pandemic owing to changes to methods of working and travel limitations.
26. Contractors and consultants have measures in place to deal with change, such as project continuity plans, and these are being adapted to tackle COVID-19.

The supply chain has been impacted, and their operational situation is under constant review as it is changing regularly. This is a similar challenge across other workstreams within the Housing and Growth Deal. There is a risk of supply shortages, interruptions and delays due to closed factories, logistics challenges, and some smaller suppliers may even be closed and no longer in business. There may also be an impact on the cost of materials, but this is still unclear. The need to mitigate health risks for onsite staff may further impact delivery programmes.

27. Officers will continue to review projects to determine what measures can be in place in preparation for a shift in our ways of working. Each scheme will require an updated risk analysis for active projects and ongoing monitoring of the situation. A further impact analysis will need to be undertaken, together with a project resourcing plan to be best placed for future working arrangements. This will also need to factor in compliance with new and changing government guidance on construction work safety standards.
28. The Housing & Growth Deal Infrastructure Programme will play a vital role in Oxfordshire's post COVID recovery, and officers are working with our HM Government partners to explore flexibilities to the terms of the Deal. This also provides an opportunity to reflect on what our priorities are.

The impact of COVID on the Oxfordshire Plan 2050

29. The partner councils are working collectively on a strategic, long term statutory Plan for Oxfordshire. The intention is that the Oxfordshire Plan 2050 will be a strategy-led Plan and an opportunity to be transformative, adding real value to the typical Local Plan approach. The Plan will look beyond current and emerging Local Plans and will identify the number of new homes, the level of economic growth, and related infrastructure that is needed across Oxfordshire to 2050. This will set the scene for a future round of Local Plans where the Local Planning Authorities will subsequently establish detailed planning policies and site allocations at a local level.
30. The recent focus of work by the Oxfordshire Plan team has been on:
 - building up the evidence base
 - stepping up member briefing
 - developing the spatial strategy and options for the Plan
 - planning for the launch of the Oxfordshire Open Thought exercise
31. Since the start of the Covid-19 restrictions, the Team has been working hard to assess the impact on the overall programme. Many of the consultants involved in developing the evidence base have reassured us that much of their work can continue as planned. We are working with them to ensure that work on the evidence base incorporates where appropriate consideration of the changing economic and social circumstances of the Covid-19 situation and any possible longer-term impacts of those.
32. There are some significant challenges with other aspects of the programme. In particular, the required officer and member meetings to approve emerging work

during the Summer, and a series of special Council meetings that were planned for September, will now likely be dominated by the Covid-19 response and recovery, limiting consideration of the Plan.

33. There are also technical limitations when attempting to brief all district and county councillors and answer their questions on the project remotely; these would likely have less success than face-to-face briefings. In some areas, additional duties have been reprioritised in the short term to enable the Oxfordshire Plan and Growth Board Teams to support the Covid-19 response effort.
34. Considering the unprecedented circumstances, it is recommended that the Growth Board requests from MHCLG a minimum seven-month extension to the current timeline we are working towards. This must be considered as a minimum extension as the full effects of COVID-19 are yet to be known. Two key changes in the revised programme for the next year would be to:
 - Move the Regulation 18 (Part 2) consultation approval process through each council back from September 2020 to December 2020, adding 3 months and consequentially:
 - Moving the Regulation 19 (Draft Plan consultation) back to September 2021.
35. As was previously planned, a series of special Council meetings will need to be held in a co-ordinated way (preferably during the same week) which would now be held in December to approve the Regulation 18 (Part 2) consultation plans. This means the 6-week consultation would be launched in January 2021. This would have a knock-on impact on the subsequent Regulation 19 consultation, which would naturally move to after the May 2021 elections.
36. By extending our timeline by the recommended seven months (measured by adoption date), this should ensure that there is still a window for early (through the Summer if restrictions allow, or the Autumn) face-to-face engagement opportunities with councillors. This timeframe would also allow more time for the non-statutory engagement work through the “Oxfordshire Open Thought” concept to gather public feedback to help inform discussions.
37. Oxfordshire Open Thought will be an open online platform for people to have their say on the future of their county as part of the Oxfordshire Plan 2050. It will tap into the wealth of knowledge and expertise within our communities to help find ideas and solutions to some of the big issues that affect our lives and the environment over the coming decades. This is a new initiative that won't replace previous consultations and responses.
38. The extension would allow more time to shape the strategy and consultation document with the Oxfordshire Plan Advisory Sub-group. This group continues to meet virtually every month. A recommended revised timeline for the development of the Oxfordshire Plan 2050 is set out below which incorporates the impact of the circumstances set out in this report.

Oxfordshire Plan Stage	Growth Board Sep 2019 Milestones	Proposed Milestones
Further engagement (Oxfordshire Thought)	Nov/Dec 19	May 20 & Sept 20
Consultation on spatial options (scale and broad locations) (Reg18 part2)	June/July 20	Jan 21
Consultation on Draft Plan (Reg 19)	Nov/Dec 20	Sept 21
Submission	March 21	Jan 22
Examination	June-Sept 21	Apr 22
Inspector's Report	December 21	July 22
Adoption	March 22	Oct 22

39. The extra time granted through the recommended timeline would allow us to take greater account of the long-term spatial framework that is being developed to support strategic planning across the Arc. This is a real opportunity to better align our work with wider sub-regional ambitions and feed into that process, and we will have more time to develop that conversation with Government. Some flexibility in the programme to allow for a greater level of engagement and opportunity for consensus building and briefing will result in a better plan, shaped by a wide variety of voices; and a stronger case to made to the Planning Inspector who will examine it.
40. Production of the Oxfordshire Plan will mean the development of a sound long-term strategy for the future of the county. This will be even more important post Covid-19; a clear strategy with consensus across the partnership can provide clarity and leadership for the community, and greater certainty for the market and service providers which will help with business planning.

Productivity

41. Productivity is an integral component of the Oxfordshire Housing and Growth Deal and sits alongside the other work streams, led by the Oxfordshire Local Enterprise Partnership (OxLEP). The headline commitment under the Productivity workstream invited Oxfordshire to be one of three ‘Trailblazer’ areas to take forward the ambitions set out by Government in its Industrial Strategy White Paper. This is in the form of an ambitious and transformational, long term *Local Industrial Strategy (LIS)*, and involved close working with Whitehall departments in the development of the Strategy. Following a review meeting during Year One of the Deal with the Government’s Cities and Local Growth Unit, officials proposed that the focus for all elements of the productivity stream moving forward needed to be built around the LIS. The productivity workstream does not have a specific funding allocation within the Deal.
42. Between November 2019 and March 2020, work has progressed in translating the ambitions set out in the LIS and across the 25 policy areas detailed in the Strategy, into a coherent programme of delivery which can attract the necessary investment from Government and the public and private sectors to realise the vision for Oxfordshire to be a top three global innovation ecosystem. The Investment Plan is over a medium-term horizon and anticipates a mixture of proposals which can be developed and ready for investment in the first 1-3

years of the LIS strategy. This also includes a mixture of medium to longer term projects which will have a 10-year runway to be fully developed out but will require critical work being undertaken in the first 12-24 months of the Strategy in order to be moved forward at pace. A wider range of engagement activities are being deployed to shape the plan and assess areas of common interest across the Oxford to Cambridge Arc.

43. In light of the pandemic, the LIS Steering Group has considered the potential economic impact of the virus on the emerging investment programme. The past months (up to May 2020) have shown the remarkable world leading capability of the region's innovation ecosystem with Oxfordshire academics, research organisations and businesses consistently being at the vanguard of national and international efforts to respond to the emergency. It is important to recognise that this leadership role in the UK economy will become even more clear as we move from the respond and recover stages, and into rebuild and renew.
44. The guiding principles of the LIS are an important reference point for this process and continue to be highly relevant in a post-COVID environment:
 - a) **Invest in Oxfordshire, deliver for the UK:** As one of three net contributors to the exchequer, Oxfordshire will deliver economic growth and manufacturing and supply chain opportunities for the rest of the UK.
 - b) **Oxfordshire – The UK's Innovation Engine:** Oxfordshire has a world-class innovation ecosystem with a concentration of global assets and strengths unrivalled by anywhere else in the UK. This, along with our strengths in research and talented workforce, make Oxfordshire a great place to invest and drive R&D and innovation in new technologies, markets, products and services.
 - c) **Global Oxfordshire, Global Britain:** Many of Oxfordshire's industries already compete on a global level, and in new emerging markets. Investing in Oxfordshire will support us in our international potential and winning new market share in technologies of the future.
45. Each project sponsor under the Investment Plan is reviewing the current status of their respective business case to consider and adjust their proposals in light of COVID-19 and identify both the economic risks but also the market opportunities which could be harnessed. This is particularly illustrated by projects which are focused around the health and life sciences sectors and energy and zero carbon. OxLEP are also looking at those projects which would be accelerated in their development considering the impact it can have for areas of the economy which have been impacted disproportionately by the pandemic such as the creative and cultural industries.
46. The LIS Investment Plan will sit alongside an expected Oxfordshire Economic Recovery Plan (ERP), whose focus will likely be about short-term measures to stabilise the economy and interventions to stimulate economic activity. These will be necessarily complementing the detailed programme coming through the LIS investment Plan and be prepared through the Joint Oxfordshire Business

Support Group (JOBS), which is a bronze level cell feeding into the established Silver and Gold structures already in place for the County.

47. Based on the market intelligence that has been gathered since the pandemic started, there are reasonably three broad areas of ERP interventions that can be progressed: financial capital support; business support, restructuring and market development; and labour market support to help people back into work. These measures will need to be aligned to, and avoid duplicating, interventions already put in place by Government.

Conclusion

48. This report provides a high-level overview of the early impacts that the Covid-19 pandemic is having on the Housing and Growth Deal. It is expected that the impacts will continue and expand as we start to see what the pace of recovery will look like. We will continue to monitor our programme closely as well as develop actions and strategies to help address the impacts as they emerge and become better understood. We expect to bring forward to the next Growth Board a further assessment of impact and a detailed update on the mitigation strategies we have or would wish to employ. Some of these measures would have been needed pre-COVID-19 to address some of the market and deal issues we were already facing.
49. Notwithstanding the relative short-term shut down of local development sites, and the wider economic restrictions, the impact will be considerable across all workstreams within the Deal. Learning from this pandemic, and adapting our ways of working, will be critical to ensuring that Oxfordshire partners are best positioned to support an effective recovery. Officers supporting the Housing and Growth Deal across the various programmes have adapted their ways of working from the start of this crisis to ensure that where possible, business continues as normal, notwithstanding the market impacts that the pandemic has had on site delivery.
50. Discussions with Homes England over the possibility of adjusting the parameters of the Housing and Growth Deal to use it as a tool for recovery have commenced and officers are working closely with OxLEP to ensure that there is a consistent and robust Recovery Strategy for Oxfordshire, of which the Housing and Growth Deal programme can play a major part. An initial contact has also been made with MHCLG to alert them to the potential impacts on the various workstreams of the Deal.
51. It will be important going forward for the Deal to take account of the new policy landscape and economic context. Delays caused across the various programmes provide an opportunity to re-evaluate priorities and milestones within the Deal, informed by the local and national recovery response. Flexibility to adapt delivery ambitions and working arrangements to match shifts in policy will be crucial in ensuring the Deal can continue to deliver for local people.
52. The Growth Board is asked to note the current impact the pandemic has had on the Housing and Growth Deal workstreams, and to endorse the revised timeline for the Oxfordshire Plan 2050, as set out in this report, for officers to take forward in discussion with MHCLG.

Background Papers

53. None

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Statement on the Fylde Annual Position Statement 2020

for Wainhomes (North West) Ltd

Emery Planning project number: 19-318



Project : 19-318
Site address : Fylde Local Plan
Client : Wainhomes (North West)
Ltd

Date : July 2020
Author : Stephen Harris

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1. Introduction

1.1 Emery Planning is instructed by Wainhomes to make representations on the Draft Annual Position Statement (APS) for Fylde Council for the period 1st April 2020 to 31st March 2025.

1.2 In summary, there are a number of overarching points which need to be taken into account. These are:-

- Inadequate consultation which significantly undermines the process;
- We have significant concerns that the LPA has not sought documentation from developers, landowners and agents to inform this draft APS which is the only opportunity for representors to make submissions to. It is not meeting the tests of clear evidence for developer, landowner or agent notes or correspondence, simply to be provided to the Planning Inspector only. As a result our assessment is not based on the full evidence that the Council has or that the Inspector will get if the APS is submitted; and,
- Notwithstanding our overarching objections, we consider that there should be deductions to specific sites included in the APS as there is not the clear evidence of deliverability set out in the Framework, the PPG and appeal decisions.

1.3 The Council's deliverable supply is claimed to be 2,991 dwellings. This equates to 6.01 years applying Liverpool and the 10% buffer. We conclude the LPA is wrong on how they have calculated the shortfall at the base date and based on Policy H1 it should be 2,331 dwellings. With the 10% buffer the 5 year requirement is 2,564 dwellings, which equates to 513 dwellings per annum. This would reduce the supply to 5.83 years.

1.4 The above figures assume that all the sites in the supply are deliverable. However, we have undertaken a detailed assessment of the supply to establish what we consider to be the true supply. We calculate the deliverable supply to be 2,074 which equates to a supply of 4.05 years.

2. The Methodology

2.1 We maintain our objection to this APS being used to assess and potentially endorse the 5 year supply through a written procedure when the only forum for an oral assessment was the Local Plan Examination. However, that assessment was undertaken against the 2012 Framework which was materially different and less onerous for deliverability. As will establish the APS has proceeded on trying to establish a 5 year supply which is not in accordance with the tests in the Framework and PPG. Lead in times, delivery rates, the lack of any meaningful engagement and no clear evidence are key concerns as we now set out.

Lead-in times and delivery rates

2.2 The APS is using an out of date methodology for lead-in times and delivery rates. Paragraphs 4.16 to 4.20 refer to the SHLAA Steering Group and a table of assumptions. Such a table is of its time and superseded by more recent guidance in the 2019 Framework. As will establish in later sections, the PPG is clear that LPA should contact the developer and landowner for each site rather than relying on an out of date methodology. It is important to note from the trajectory that with the exception of the Clifton House Farm site, there is currently no reference to any engagement with applicants or developers. This is a fundamental and in our view one that means the APS should not proceed.

Absence of Clear Evidence

2.3 We have significant concerns that the documentation from developers, landowners and agents has not been provided as part of the consultation but it will be provided at a later date. As this consultation is the only opportunity for representors to make submissions on the Council's evidence, it must be included in the draft APS, if not before, in order for other parties to interrogate the information. It is not meeting the tests of clear evidence for developer, landowner or agent notes or correspondence, simply to be provided to the Planning Inspector only. On that basis our assessment is not based on the full evidence that the Council has or that the Inspector will get if the APS is submitted. Our position is endorsed by the following commentary on the PPG.

2.4 Paragraph: 048 Reference ID: 3-048-20180913 of the PPG asks "What information will annual reviews of 5 year land supply, including annual position statements, need to include?". It then states:

“Assessments need to be realistic and made publicly available in an accessible format as soon as they have been completed. Assessments will be expected to include”

2.5 In this case the assessment is not complete and even if there is evidence it is not publicly available. Seven criteria are then set out.

- for sites with detailed planning permission, details of numbers of homes under construction and completed each year; and where delivery has either exceeded or not progressed as expected, **a commentary indicating the reasons for acceleration or delays to commencement on site or effects on build out rates;**
- for small sites, details of their current planning status and record of completions and homes under construction by site;
- for sites with outline consent or allocated in adopted plans (or with permission in principle identified on Part 2 of brownfield land registers, and where included in the 5 year housing land supply), **information and clear evidence that there will be housing completions on site within 5 years, including current planning status, timescales and progress towards detailed permission;**
- permissions granted for windfall development by year and how this compares with the windfall allowance;
- details of demolitions and planned demolitions which will have an impact on net completions;
- total net completions from the plan base date by year (broken down into types of development e.g. affordable housing); and
- the 5 year land supply calculation clearly indicating buffers and shortfalls and the number of years of supply.

2.6 The information in Appendix 1 is limited and simply cannot be considered to meet the PPG. One or two lines on each site is simply not going to comply. With the information not being made publicly available in any format these statements can have no weight as all we see is the LPA's summary. The consultation enables us to make our own investigations but our final say on this process is on a half-finished draft APS where the LPA can then produce new information to either rebut our evidence and provide new evidence which we cannot comment on. The draft APS consulted on should be the final version.

2.7 Paragraph: 050 Reference ID: 3-050-20180913 asks “How is 5 year land supply confirmed through an annual position statement?” Guidance is then set out in 3 paragraphs. We break down these paragraphs in order to assess how the APS has been prepared.

Where a local planning authority subsequently wishes to confirm their 5 year land supply position through an annual position statement, they will need to advise the Planning Inspectorate of their intention to do so by 1 April each year.

2.8 We note that the LPA did inform PINS of their intention.

To ensure the robustness of the assessment of the deliverability of sites, the local planning authority should carry out an engagement process to inform the preparation of the annual position statement.

2.9 We have a fundamental objection to the APS and the procedure the LPA has carried out. Whilst we understand contact has been made to landowners and developers on some sites in the supply, the actual clear evidence required by the PPG is not provided. Wainhomes has no record of an approach on Cropper Road West, therefore as a minimum all correspondence should be provided, so representors can at least see what has been provided to the Council as it prepared its APS. To have no Engagement Statement, even in draft to this point, is a significant lack of openness and transparency.

2.10 Paragraphs 4.24 and 4.27 of the APS state:

"4.24 Site promoters are invited to provide updated information on their likely commencement of delivery/ delivery rates going forward.

4.25 It is recognised that there is a degree of uncertainty as to the impact of the COVID-19 lockdown period. The majority of development sites shut for a two-month period, which on a pro-rata basis would be equivalent to one-sixth of a year's delivery. On a site delivering the standard assumption rate of 30 dwellings per annum, this would amount to 5 dwellings, and would give delivery of 25 rather than 30 dwellings in the current year, with the 5 dwellings added to the end of the period of delivery. However, in terms of impact on the supply over 5 years, a number of sites will end during the five-year period and therefore delivery on those sites within the five years would not be affected. On other sites, commercial imperatives may encourage developers to make up for lost delivery over a period, which is unlikely to exceed five years. There is some concern over the economic impact of COVID-19 on the overall housing market, but it is much too early to make any assessment and it cannot be justified to make a revision to housing delivery via a blanket approach on the basis of macro-economic outlook and its impact on overall housing demand at this stage. It should be noted that at the base date 1st April 2020, one week into the lockdown, no rational analysis of the position was possible.

4.26 Therefore, individual site developers are invited to comment on the extent to which the existing delivery rates on their sites are likely to be impacted, if at all. Where information in this regard has already been provided it has been incorporated into the trajectories in Appendices 1 and 2."

4.27 The PPG requires that commentary is provided indicating reasons why a site has either exceeded or not progressed as expected. **Comments are provided in this edition on the basis of known information, including information provided on request from developers/landowners and their agents. Any further information provided by site owners/developers in response to the consultation on this draft Annual Position Statement will be considered for incorporation into the final version of this statement for submission to the Planning Inspectorate**.
(our emphasis)

2.11 We have highlighted certain parts of the above paragraphs which emphasise that this consultation is on a half-finished draft APS where the LPA can then produce new information to either rebut our evidence and provide new evidence which we cannot comment on. The draft APS consulted on should be the final version.

2.12 As an interested party with sites in the supply and sites without consent, the engagement has been minimal as:

- We were not notified by letter or email but came across it on the LPA website;
- We are given a 3 week period. Potential representors may well miss the opportunity to comment particularly if developers and landowners have not been contacted on their specific site. Wyre Council has published their draft APS for 4 weeks. We consider a minimum of 6 weeks is necessary; and,
- Have Parish Council's and local residents been notified?

2.13 We only have the benefit of the LPAs short summary in the final column of Appendix 1 of the APS. Therefore we are not able to assess or interrogate the information provided by agents, landowners and developers to test their conclusions. It is important to note from the trajectory that with the exception of the Clifton House Farm site, there is currently no reference to any engagement with any other applicant or developer.

2.14 The LPA states that this information, along with any updated responses will be provided to the Planning Inspectorate. This means that we will not have the opportunity to comment on the information to date or that to be provided, and on that basis there is a simple but crucial unfairness point to the process. That simply cannot be right or fair on such an important topic.

The local planning authority can then submit their annual position statement to the Planning Inspectorate for review by 31 July of the same year.

2.15 We assume that the LPA will meet this deadline, although due to our concerns on the procedural aspect we question whether a submission should be made.

When assessing an annual position statement, the Planning Inspectorate will carry out a 2 stage assessment.

First, they will consider whether the correct process has been followed (i.e. whether a 5 year supply has been confirmed initially through an up to date plan and whether satisfactory stakeholder engagement has been carried out).

2.16 For the reasons set out above, satisfactory stakeholder engagement has not been carried out and we have not been provided with the required clear evidence in order to comment on. Whilst our submissions later set out our view on sites, this has been done without the benefit of the information the Council has and will receive during the consultation process and it puts any party seeking to challenge the APS at a significant disadvantage.

Second, they will look at whether the evidence is sufficient to demonstrate a 5 year supply of deliverable housing sites, with an appropriate buffer, at the base date of the assessment (i.e. 1 April in the relevant year).

2.17 Our submissions on this point are in Section 10 of this Statement.

The Planning Inspector's assessment will be made on the basis of the written material provided by the authority and the Planning Inspector will not refer back to the local planning authority or any other stakeholders to seek further information or to enter into dialogue about sites.

2.18 This goes precisely to our objection on the procedure as all parties must have the information that is to be provided to the Inspector. If not, then the Inspector's decision is taken on all the evidence yet representors and stakeholders are only provided with part of the picture. As this consultation is the only opportunity we have, all evidence must be provided now for review and comment. If not then the process is both opaque and unfair.

2.19 If housing land supply is a matter for a Section 78 appeal, it is usually dealt with by either a hearing or inquiry.

2.20 We note that Criterion K of the PINS Procedural Guidance for Appeals¹ states:

"Hearing - a hearing would be appropriate if:

- **the Inspector is likely to need to test the evidence by questioning or to clarify matters**¹³; or

¹
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/871973/Procedural_Guide_Planning_appeals_version_9.pdf

- *the status or personal circumstances of the appellant are at issue¹⁴; or*
- *there is no need for evidence to be tested through formal questioning by an advocate or given on oath; or*
- *the case has generated a level of local interest such as to warrant a hearing¹⁵; or*
- *it can reasonably be expected that the parties will be able to present their own cases (supported by professional witnesses if required) without the need for an advocate to represent them; or*
- *in an enforcement appeal, the grounds of appeal, the alleged breach, and the requirements of the notice, are relatively straightforward.*

2.21 Footnote 13 states:

“13 For example where detailed evidence on housing land supply needs to be tested by questioning.”

2.22 Whilst we note the process for an APS, we do want to raise our concern when we have no further opportunity to comment on the APS and any additional information provided.

It is therefore important that the authority has carried out a robust stakeholder engagement process and that adequate information is provided about disputed sites.

2.23 At this stage there is no clarity on what the disputed sites are and it will only be when the consultation closes that the LPA will know which sites are disputed. However we cannot give our full position on which sites we dispute and do not dispute if the information is not provided. Section 10 is based on the information provided to date and from what we have obtained. The LPA should have published a draft APS and then consulted upon it, including a meeting with all stakeholders before the draft APS is formally published for consultation prior to submission to PINS.

2.24 Paragraph: 051 Reference ID: 3-051-20180913 of the PPG asks “What engagement should the authority undertake to prepare an annual position statement?” We assess each below.

- All local planning authorities will need to engage with stakeholders who have an impact on the delivery of sites. The aim is to provide robust challenge and ultimately seek as much agreement as possible, so that the authority can reach a reasoned conclusion on the potential delivery on sites which contribute to the 5 year land supply. Those authorities who are seeking to demonstrate a confirmed 5 year land supply will need to produce an engagement statement and submit this to the Planning Inspectorate, including:

- an overview of the process of engagement with site owners/applicants, developers and other stakeholders and a schedule of site based data resulting from this;
- specific identification of any disputed sites where consensus on likely delivery has not been reached, including sufficient evidence in support of and opposition to the disputed site(s) to allow a Planning Inspector to reach a reasoned conclusion; as well as an indication of the impact of any disputed sites on the number of years of supply;
- the conclusions which have been reached on each site by the local planning authority in consideration of the outcome of stakeholder engagement;
- the conclusions which have been reached about the overall 5 year land supply position.

2.25 There has been no engagement with the APS until its publication and on the information provided parties have not been able to “provide robust challenge” or even discuss agreement with the LPA. The above process has simply not been followed and the absence of even a draft Appendix 3 (Engagement Statement) of what has been done to date further demonstrates that the process has not been followed.

Provided the correct process has been followed and sufficient information has been provided about any disputed sites, the Planning Inspectorate will issue their recommendation in October of the same year, confirming, if appropriate, the housing land supply until the following October.

2.26 Noted.

2.27 It is clear the LPA has not followed procedure and the APS should be withdrawn.

3. Assessment of the Council's housing supply

3.1 Our assessment of the Council's five year housing land supply is based on six key stages:

1. The base date and five year period;
2. The housing requirement;
3. Identifying the past shortfall;
4. Identifying the method of addressing the past shortfall;
5. Applying the appropriate buffer; and
6. Identifying a Realistic and Deliverable Supply.

3.2 Each stage is addressed below.

4. Stage 1: Agreeing the base date and five year period

4.1 The base date is the start date for the five year period for which both the requirement and supply should relate. The Council's APS has a base date of 31st March 2020 with the five year period being 1st April 2020 to 31st March 2025. This is agreed.

5. Stage 2: Identifying the housing requirement

National planning policy and guidance

5.1 Paragraph 60 of the Framework states:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

5.2 Paragraph 73 of the Framework states:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old."

5.3 Footnote 37 of the Framework explains that unless the housing requirement set out in the strategic policy has been “*reviewed and found not to require updating*”, local housing need will be used for assessing whether a five year supply of specific deliverable sites exists using the standard method set out in the PPG where the strategic policy is more than five years old.

5.4 Paragraph 3-029 of the PPG² explains:

“The purpose of the 5 year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years.”

5.5 Paragraph 3-030 of the PPG³ states:

“Housing requirement figures identified in strategic policies should be used as the starting point for calculating the 5 year land supply figure:

- for the first 5 years of the plan, and*
- where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating.*

In other circumstances, the starting point for calculating the 5 year land supply will be local housing need using the standard method.”

5.6 Consequently, it is clear that the five year supply should be measured against the housing requirement set out in strategic policies when those policies are less than five years old and when they are more than five years old, the local housing need figure should be used unless the housing requirement has been reviewed and found not to require updating. In this case, with the Local Plan being adopted in October 2018, the housing requirement must be used.

5.7 The Local Plan sets the housing requirement for the Fylde as 415 dwellings per annum. Therefore the requirement for the **5 year period is 2,075 dwellings**.

Partial Review of the FLP32

5.8 Paragraphs 2.6 to 2.9 of the APS refer to the Partial Review of the Local Plan. We do not need to respond on this as the adopted Local Plan is the only requirement to apply which the LPA accept.

² Paragraph: 029 Reference ID: 3-029-20180913: “*What is the purpose of the 5 year housing land supply?*”

³ Paragraph: 030 Reference ID: 3-030-20180913: “*How can an authority demonstrate a 5 year supply of deliverable housing sites?*”

- 5.9 However, we note that paragraph 2.7 states that the Council considers it necessary to undertake the Partial Review in order to fulfil the requirements of paragraph 212 of the Framework, which notes that plans may need to be revised to reflect policy changes that the replacement Framework has made. Paragraph 2.8 states that *“The Partial Review includes revisions to reflect the change in methodology for calculating minimum local housing need in accordance with paragraph 60 of the Framework.”*
- 5.10 Table 1a then sets out the supply using the local housing need figure of 275, which is the correct starting point using the current standard method which use the 2014 household projections.
- 5.11 The 2018 household projections have now been issued. These are not being used for calculating LHN as the standard method is being revised. However Fylde has seen a significant increase with households increasing by 428 per annum between 2020 and 2030. If we apply (for illustrative purposes only) this household increase to the current standard method the annual requirement would be 466 dwellings per annum which is higher than Policy H1 requirement of 415 dwellings per annum and significantly above the current LHN of 275.
- 5.12 As noted this is not for this APS, but a review of the Local Plan, but it is clear that housing need will increase. In that context delivering the homes people need in this 5 year period is important and a robust 5 year supply is crucial to doing that. As we will establish the LPA cannot demonstrate a 5 year supply and those people in housing need will not be provided with the home they urgently require.

6. Stage 3: Shortfall

- 6.1 Paragraphs 4.4 and 4.6 of the Draft APS states:

“4.4 Shortfall is calculated from the base date of the Local Plan (in accordance with para. 044 of PPG on HELAA). The annual requirement figure of 415 is rebased in the Local Plan to include shortfall from early in the plan period, before the examination took place. The Local Plan spreads this shortfall over the remainder of the plan period (Liverpool method), resulting in a residual requirement from 1st April 2017 of 479 dwellings per annum. This approach has been found sound at the Examination in Public and is written into the statutory adopted development plan in Policy H1 and its supporting text.

4.5 Delivery in the three years from 1st April 2017 has been 463, 490 and 634 net homes respectively. This leaves a surplus of 150 against the residual requirement. In accordance with PPG, this can be set against previous shortfall.

4.6 The five year requirement incorporating shortfall is therefore 5×479 , minus the surplus from the last three years, which gives 2,245 net dwellings."

6.2 The shortfall since that date is set out below.

Table 1 – Calculating the Backlog

A	Housing requirement 01/04/11 to 31/03/20 (9 years)	3,735
B	Net completions up to 31/03/20	3,121
C	Shortfall at 01/04/20 (A-B)	614

6.3 The shortfall is 614 dwellings.

7. Stage 4: Identifying the method of addressing the past shortfall

7.1 Policy H1 states:

"The Council will provide for and manage the delivery of new housing by:

a) Setting and applying a minimum housing requirement of 415 net homes per annum for the plan period 2011-2032

b) Keeping under review housing delivery performance on the basis of rolling 3 year completion levels as set out in accordance with the Monitoring Framework at Appendix 8.

"c) Ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply calculated using the "Liverpool" method from the start of each annual monitoring period and in locations that are in line with the Policy DLF1 (Development Locations for Fylde) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Local Plan.

d) The delivery of the developable sites, which are allocated for housing and mixed use from 1 April 2011 to 31 March 2032 and provided for through allowances, to provide for a minimum of 8,715 homes."

7.2 As established in the last section, the shortfall in housing delivery for the first 9 years of the plan period (at 1st April 2020) is 614 dwellings.

- 7.3 On the basis that the Liverpool approach is applied then the figure for the next 5 years is 256 dwellings. This is calculated by dividing 614 by 12 (years) and multiplying by 5 (years). It is this figure that should be added to 2,075 dwellings from Stage 2 above which at 1st April 2020 results in 2,331 dwellings (i.e. $415 \times 5 \text{ years} + 256 \text{ past shortfall} = 2,331 \text{ dwellings}$).
- 7.4 The draft APS has however calculated a different figure of 2,245 dwellings. This is because the LPA has used the figure of 479 dwellings per annum and multiplied that by the 5 years, with a subtraction of 150 dwellings for the surplus over the last 3 years.
- 7.5 Our position is that this is incorrect and contrary to Policy H1. This is because Part A of Policy H1 states that the requirement is 415 dwellings per annum for the period 2011-2032. That is the starting point of the calculation as we have set out in Stage 2. For the purposes of calculating a 5 year supply, which is the purpose of this APS, part C of Policy H1 is clear when it states that “a continuous 5 year supply calculated using the “Liverpool” method from the start of each annual monitoring period” should be provided. The only interpretation of part C is to calculate the shortfall at 1st April 2020 and then apply the Liverpool approach for the remaining 12 years. This would accord with Indicator 2 of Appendix 8 of the Local Plan.
- 7.6 The Council has rather used part (B) of Policy H1 to justify their calculation. However the purpose of the 3 year completion level is not for the purposes of a 5 year supply but for other actions as set out in Indicator 1 of Appendix 8.
- 7.7 Therefore, the five-year requirement at 1st April 2020 is 2,331 dwellings (i.e. $415 \times 5 \text{ years} + 256 \text{ past shortfall} = \mathbf{2,331 \text{ dwellings}}$).
- 7.8 Even if the Council was correct in using a 3 year period, what they have done is to deduct the 150 surplus for the next 5 years which is applying the Sedgfield Method. The LPA successfully challenged the Inspectors Report to the 2019 APS on the use of the Sedgfield method, yet now adopt it when they have a surplus. That is contrary to Policy H1 and the subsequent judgement.
- 7.9 If the Council's approach of using 479 dwellings x 5 years (2,395), then they should not subtract 150 for the 5 year period but rather it should be spread across the plan period (Liverpool approach) and only the proportion of the 150 for the 5 year period should be subtracted. We calculate this to be 63 dwellings ($150/12 \text{ years} \times 5 \text{ years}$). Subtracting these 63 dwellings gets to 2,332 dwellings for the 5 year period which is 1 dwelling greater than our approach above.

7.10 It is clear that the APS figure of 2,245 is in conflict with Policy H1 and the Court Order. Our figure of 2,331 is the policy compliant method.

8. Stage 5: Applying the appropriate buffer

8.1 Paragraph 73 of the Framework states:

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- *5% to ensure choice and competition in the market for land; or*
- *10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- *20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*

8.2 Footnote 39 of the Framework explains that from November 2018 “significant under delivery” of housing will be measured against the Housing Delivery Test, where this indicates that delivery was below 85% of the housing requirement.

8.3 The Council passed the 2019 HDT and therefore the 5% buffer would apply. However with the advent of the APS, then the 10% buffer has been applied.

8.4 Under the Liverpool method, the five year requirement at 1st April 2019 is 2,635 dwellings (i.e. 415 X 5 years + 256 past shortfall + 10% buffer = 2,564 dwellings).

8.5 The only area of disagreement from Stages 1 to 5 is how the LPA has adjusted the shortfall in establishing the requirement. A summary of the housing requirement is set out in the following table.

Table 2: Summary in relation to the housing requirement

	Requirement	LPA	Emery
A	Annual requirement	479	415
B	Past shortfall at 1 st April 2020	-150	614
C	Amount of past shortfall to be addressed in the five year period	-150	256
D	Total five year requirement (A X 5 + C)	2,245	2,331
E	Requirement plus 10% buffer (D + 10%)	2,470	2,564
F	Annual requirement plus buffer (E / 5 years)	494	513

9. Stage 6: Identifying a Realistic and Deliverable Supply

What constitutes a deliverable site?

Previous National Planning Policy (2012) and Guidance (2014)

9.1 Footnote 11 of the 2012 Framework stated:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.”

9.2 Paragraph 3-031 of the previous PPG (dated 6th March 2014): “What constitutes a ‘deliverable site’ in the context of housing policy?” stated:

“Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5 years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the 5-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (eg infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a 5-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust 5-year housing supply."

- 9.3 Therefore, under the 2012 Framework, all sites with planning permission, regardless of their size or whether the planning permission was in outline or in full were to be considered deliverable until permission expired unless there was clear evidence that schemes would not be "implemented" within five years. The PPG went further by stating that allocated sites "could" be deliverable and even non-allocated sites without planning permission "can" be considered capable of being delivered.

Draft revised National Planning Policy Framework (March to May 2018)

- 9.4 The Government consulted on the draft revised Framework between March and May 2018. The draft revised Framework provided the following definition of "deliverable" in the glossary:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Small sites, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

- 9.5 Question 43 of the Government's consultation on the draft revised NPPF asked: "do you have any comments on the glossary?"
- 9.6 Under the title: "What constitutes a 'deliverable site' in the context of housing policy?", the draft Planning Practice Guidance (March 2018, page 16) simply included the same definition as that set out in the draft revised NPPF above.

Government's response to the draft revised Framework consultation

- 9.7 There were 750 responses to question 43 of the consultation. Some of the points raised included:

"Local authorities called for the proposed definition of 'deliverable' to be reconsidered, as it may result in them being unable to prove a five year land supply and place additional burdens on local authorities to produce evidence.

Private sector organisations were supportive of the proposed definition.” (our emphasis)

9.8 The government's response was as follows:

*“The Government has considered whether the definition of 'deliverable' should be amended further, but having assessed the responses it has not made additional changes. This is because **the wording proposed in the consultation is considered to set appropriate and realistic expectations for when sites of different types are likely to come forward.**” (our emphasis)*

Revised Framework (July 2018)

9.9 The revised Framework was published on 24th July 2018. The definition of deliverable was provided on page 66 of the 2018 Framework and was as follows:

*“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). **Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**” (our emphasis)*

9.10 Consequently, the 2018 Framework stated that sites with outline planning permission or allocated sites should “only” be considered deliverable where there is “clear evidence” that housing completions will “begin” on site within five years. The onus is on the Council to provide the clear evidence for any sites with outline planning permission and allocated sites it considers deliverable.

9.11 The “clear evidence” required is not described any further in the Framework. However, it is discussed in the updated PPG, which we discuss below.

Technical consultation on updates to national planning policy and guidance

9.12 Between 26th October and 7th December 2018, the Government consulted on:

- Changes to planning practice guidance relating to the standard method for assessing local housing need; and
- Policy clarifications relating to housing land supply, the definition of deliverable and appropriate assessment.

9.13 In terms of the definition of deliverable, the consultation document stated at paragraph 36:

“The new Framework published in July this year set out a revised definition of ‘deliverable’ (contained in the glossary at Annex 2 of the Framework). Early experience of applying this definition has suggested that it would benefit from some clarification of the wording. In particular, the existing text could be clearer that sites that are not major development, and which have only an outline planning consent, are in principle considered to be deliverable. The relationship between the first sentence of the definition (which sets out general considerations in terms of deliverability), and the remainder that explains how particular circumstances should be approached, also needs to be clear. The specific circumstances cited in the definition are intended to indicate how the general considerations in the first sentence apply to the types of development referred to in the text that follows.

9.14 The consultation document then set out a proposed revised definition as follows:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

*b) **where a site has outline planning permission for major development, has been allocated in a development plan**, has a grant of permission in principle, or is identified on a brownfield register, it **should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**”(our emphasis)*

9.15 Question 5 of the consultation asked: “Do you agree with the proposed clarification to the glossary definition of “deliverable”?”

Government’s response to the technical consultation

9.16 The Government's response to the consultation was published on 19th February 2019. It explained that there were 461 responses to question 5 and the points raised included:

“• There was considerable support (68%) for the proposal from the private sector, although some concerns were raised that sites will need longer than five years to be built out.

- About half (54%) of local authorities agreed with the proposal, although some felt that it may make delivery harder to demonstrate, resulting in sites being removed from plans and therefore make it more difficult for authorities when demonstrating a five year land supply.

- **Many respondents across the groups suggested that sites with outline planning permission and / or sites that are included within local plans should be included in the definition of deliverable.** Many respondents also suggested that the proposal would result in developers using specialist knowledge and resources to influence planning decisions in their favour, as well as complaints concerning land banking" (**our emphasis**)

9.17 The Government's response states:

"The Government welcomes the views submitted on this proposal. Taking them into account, it considers that the revised definition does provide helpful clarification of the approach established already in the National Planning Policy Framework. **The concerns that have been expressed relate more to this overall approach than the merits of the clarification (and the relevance of the overall approach was considered when the Framework was being finalised, following the consultation in the spring of 2018).** The changes to the definition that the present consultation proposes should not make it harder for authorities to demonstrate that they have a deliverable portfolio of sites; indeed, it makes it clearer that non-major sites with outline consent should be considered deliverable unless there is evidence to the contrary. **We are, however, providing further information on applying the approach through planning practice guidance.**" (**our emphasis**).

Revised Framework (February 2019)

9.18 The definition of "deliverable" is set out on page 66 of the 2019 Framework states:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) **where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.**" (**our emphasis**)

9.19 The “further information” on applying the approach of the revised definition of “deliverable” referred to in the Government’s response has now been set out in the PPG, which is discussed below.

Updated Planning Practice Guidance (PPG, September 2018)

9.20 The PPG was originally updated on 13th September 2018. Paragraph 3-036 of the PPG⁴ stated:

“For sites with outline planning permission, permission in principle, allocated in a development plan or identified on a brownfield register, where clear evidence is required to demonstrate that housing completions will begin on site within 5 years, this evidence may include:

- *any progress being made towards the submission of an application;*
- *any progress with site assessment work; and*
- *any relevant information about site viability, ownership constraints or infrastructure provision.*

For example:

- *a statement of common ground between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates.*
- *a hybrid planning permission for large sites which links to a planning performance agreement that sets out the timescale for conclusion of reserved matters applications and discharge of conditions.”*

Further Updated Planning Practice Guidance (PPG, July 2019)

9.21 The PPG was more recently updated on 22nd July 2019. Paragraph 68-007 of the PPG⁵ provides some examples of the types of evidence, which could be provided to support the inclusion of sites with outline planning permission for major development and allocated sites without planning permission. It states:

“In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to

⁴ Paragraph: 036 Reference ID: 3-036-20180913: ““What constitutes a ‘deliverable site’ in the context of housing policy?”

⁵ Paragraph 007 Reference ID: 68-007-20190722: “What constitutes a ‘deliverable’ housing site in the context of plan-making and decision-taking?”

be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- firm progress with site assessment work; or*
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites."

9.22 The Fylde APS clearly fails on providing this information.

Relevant Appeal Decisions

9.23 The following appeal decisions are relevant as it sets out how the policy context has been assessed for decision making.

Land to the south of Cox Green Road, Rudgwick, Surrey⁶

9.24 As part of its case in seeking to defend an appeal made by Parkes Ltd against its decision to refuse to grant outline planning permission for up to 53 dwellings at land to the south of Cox Green

⁶ PINS ref: 3227970

Road, Rudgwick, Waverley Council claimed it could demonstrate a supply of 5,708 dwellings, which equated to just under 5.2 years against its housing requirement and buffer.

9.25 The Inspector concluded that the supply should be reduced by 928 dwellings and therefore that Waverley Council could only demonstrate a “deliverable” supply of 4.3 years. The reasons why the Inspector considered the supply should be reduced are set out in paragraphs 10 to 27 of the appeal decision. We note the following points which are highly material to the Fylde APS:

- Firstly, whilst Waverley Council's assumptions of delivery on a site at Dunsfold Park relied on estimated numbers of delivery from pro-forma returned by the site's lead developer, the Inspector considered that the details contained within it were “scant”. **There was no explanation as to how the timings of delivery could be achieved including the intended timescales for submitting and approving reserved matters, applications of discharge of conditions, site preparation and installing infrastructure.**
- Secondly, 24 sites without full planning permission were removed for the reason set out in paragraphs 21 to 24. Paragraph 23 of the appeal decision states:

“To justify including sites of these types it would be necessary to produce clear and specific evidence, in sufficient detail, to show that the sites were available, suitable, and achievable, with a realistic prospect of delivery within the required timescale. I appreciate that this would be a large task, but self-evidently the size of that task is related to the number of sites without full planning permission that the Council seeks to rely on. On the evidence before me now, none of the sites in the second section of the schedule can currently justify being included in the 5-year supply.” (our emphasis)

Land off Popes Lane, Sturry, Kent⁷

9.26 As part of its case in seeking to defend an appeal against its decision to refuse to grant outline planning permission for up to 140 no. dwellings at land off Popes Lane, Sturry, Canterbury City Council claimed that it could demonstrate a 6.72 year supply. For there to be a shortfall in the supply, Canterbury Council claimed that some 1,654 dwellings (out of 6,455 dwellings) would need to be removed from the “deliverable” supply.

9.27 The Inspector however found that the Council could not demonstrate a five year housing land supply. The Inspector concluded that the deliverable supply was 4,644 dwellings, which equates to 4.8 years. The reason why the Inspector concluded that the deliverable supply was 1,811

⁷ PINS ref: 3216104

dwellings (28%) less than the Council claimed was because he found that 10 sites should be removed from the supply because:

“there is insufficient clear evidence to show that they meet the NPPF’s definition of deliverable. Sites which are not deliverable cannot be counted as part of the supply for the purposes of meeting the 5-year requirement.” (paragraph 23)

9.28 In this case, Canterbury Council had provided statements of common ground between the Council and the developer or landowner to support the inclusion of several of the disputed sites. No such statements are provided as part of the Fylde APS. The Inspector found that the statements of common ground did not demonstrate that the development prospect was realistic. Paragraph 23 of the appeal decision states:

*“For a number of the disputed sites, the Council’s evidence is founded on site-specific SCGs which have been agreed with the developer or landowner of the site in question. I appreciate that the PPG refers to SCGs as an admissible type of evidence, and I have had full regard to that advice. But nevertheless, the evidential value of any particular SCG in this context is dependent on its content. In a number of cases, **the SCGs produced by the Council primarily record the developer’s or landowner’s stated intentions. Without any further detail, as to the means by which infrastructure requirements or other likely obstacles are to be overcome, and the timescales involved, this type of SCG does not seem to me to demonstrate that the development prospect is realistic. In addition, most of the site-specific SCGs are undated, thus leaving some uncertainty as to whether they represent the most up-to-date position.**”* (**our emphasis**)

9.29 This is crucial as all we have as part of the Fylde APS is a very simple position with no letters or evidence as to why sites are deliverable.

Land east of Gleneagles Way, Hatfield Peverel, Braintree⁸

9.30 The Secretary of State called-in for his own determination David Wilson Homes’ application to Braintree District Council for up to 120 dwellings at land east of Gleneagles Way, Hatfield Peverel. An inquiry was held in December 2017 and January 2018 and the Inspector issued his report on 20th March 2018 i.e. before the 2018 Framework was published. Over a year after the Inspector had issued his report, on 11th April 2019, Braintree District Council published new information in relation to housing land supply. This was an addendum to Braintree’s housing land supply position paper, which included the evidence the Council relied on to support the inclusion of sites with

⁸ PINS ref: 3180729

outline planning permission for major development and allocated sites without planning permission in its supply.

- 9.31 Braintree District Council claimed that it could demonstrate a 5.29 year supply. In determining the appeal, the Secretary of State concluded that the Council could only demonstrate a 4.15 year supply. The reason for this is set out in paragraph 41 of the decision letter, which states:

*“Having reviewed the housing trajectory published on 11 April, the Secretary of State considers that the evidence provided to support some of the claimed supply in respect of sites with outline planning permission of 10 dwellings or more, and sites without planning permission do not meet the requirement in the Framework Glossary definition of “deliverable” **that there be clear evidence that housing completions will begin on site within five years. He has therefore removed ten sites from the housing trajectory**”*

- 9.32 The ten removed sites are listed in a table provided at Annex D on page 24 of the Secretary of State's decision letter. Of the ten sites removed from Braintree's supply, 9 had outline planning permission and the remaining site was an allocated site with a hybrid planning application pending determination. For these sites, Braintree District Council had submitted completed forms and emails from landowners, developers and their agents providing the timescales for the submission of reserved matters applications and anticipated build rates. However, the Secretary of State removed these sites because he did not consider they met the definition of “deliverable” as set out in the Framework. Again a much more detailed level of information to that contained in the Fylde APS.

- 9.33 The Secretary of State made the same conclusions in three other appeal decisions in Braintree at that time: land off Stone Path Drive, Hatfield Peverel (ref: 3180725 – 8th July 2019), land off Stone Path Drive, Hatfield Peverel (ref: 3162004 – 8th July 2019) and land north and south of Fitch Way, Pods Brook Road, Braintree (ref: 3197293 – 13th June 2019).

Green Road, Woolpit, Suffolk⁹

- 9.34 In allowing the appeal for 49 dwellings at land off Green Road, Woolpit, Inspector Harold Stephens concluded that Mid Sussex Council could not demonstrate a five year supply. The Inspector concluded the following:

⁹ PINS ref: 3194926

- Sites with outline planning permission made up a very large proportion of Mid Sussex Council's claimed supply (paragraph 68);
- The onus is on the LPA to provide clear evidence that housing completions will begin in the next five years for sites with outline planning permission for major development and allocated sites (paragraph 65); and
- Mid Sussex Council's AMR fell substantially short of producing the evidence that sites with outline planning permission for major development are expected to have as set out in paragraphs 3-035, 3-047 and 3-048 of the previous version of the PPG (paragraphs 68 and 69).

Entech House, London Road, Woolmer Green¹⁰

9.35 In allowing an appeal for 72 dwellings, Inspector George Baird concluded that Welwyn Hatfield Borough Council could not demonstrate a five year supply. The Inspector concluded the following:

- The definition of "deliverable" in the revised Framework goes significantly further than the 2012 Framework (paragraph 30);
- The definition of "deliverable" identifies 2 closed lists. Whilst sites with outline planning permission, with permission in principle, allocated in the development plan or identified on a brownfield register can be included within the supply, there is no presumption of deliverability and it is for the LPA to justify their inclusion with clear evidence that housing completions will begin on-site within 5 years (paragraph 30);
- The PPG provides a non-exhaustive list of examples of the type of evidence that can be used to justify the inclusion of such sites within the 5 year supply (paragraph 30); and
- The information produced by Welwyn Hatfield to support sites with outline planning permission was on data sheets, which the Inspector found to be short of the "clear evidence" required by the Framework to justify the inclusion of these sites within the housing land supply (paragraph 32).

Land south of Kislingbury Road, Rothersthorpe¹¹

9.36 Inspector Philip Major agreed with the Appellant (Emery Planning on behalf of Hollins Strategic Land) that South Northamptonshire Council could not demonstrate a deliverable five year housing land supply. In terms of the clear evidence required, the Inspector concluded the following:

¹⁰ PINS ref: 3190821

¹¹ PINS ref: 3206346

- It is insufficient to rely on the fact that outline planning permission exists. The PPG indicates that the assessment of housing land supply should go further and seek evidence that completions are likely to be forthcoming (paragraph 16); and
- Whilst the LPA had assumed that further phases of development on large sites would come forward in the five year period on the basis of delivery of current phases, there was no real evidence to back up the position (paragraph 17); and
- A short email from a developer confirming build rates on one of the sites does not amount to the clear evidence of deliverability, which is now required (paragraph 17).

9.37 In summary, the above appeal decisions found that sites with outline planning permission for major development and allocated sites should not be included in the deliverable supply where the respective Councils had failed to provide the clear evidence required. This is also the case in terms of Fylde's APS for the sites where no clear evidence has been provided.

9.38 Even where Councils had produced some evidence, Inspectors and the Secretary of State found that the evidence provided was not enough to include some of the category b) sites as deliverable. In the Rothersthorpe case, this was in the form of an email from a developer. In the Braintree case, this was in the form of proformas and emails from developers with details of who the developer was, when the reserved matters application would be made and what the anticipated build rates would be. In the Rudgwick and Sturry cases, this was in the form of statements of common ground between the Council and the developer.

9.39 When Inspectors and the Secretary of State has consistently omitted sites with a higher level of information, then we respectfully suggest that the Fylde APS cannot comply.

Conclusion

9.40 There are two key issues as result of the revised Framework and the updated PPG:

- Firstly, there has been a radical change in terms of what constitutes a deliverable site; and
- Secondly, the Government's view as to what this means has been set out in the PPG.

9.41 Whilst the previous definition in the 2012 Framework considered that all sites with planning permission should be considered deliverable, the revised definition is clear that only sites with detailed consent for major development should be considered deliverable and those with outline planning permission should only be considered deliverable where there is clear evidence that housing completions will begin in five years.

- 9.42 The revised definition of “deliverable” effectively sets out when sites at various stages of the planning process are realistically expected to deliver dwellings. This was made clear in the Government’s response to the consultation on the then draft revised Framework.
- 9.43 As above, the PPG has been updated to provide the type of evidence required to be able to consider that sites with outline planning permission for major development, allocated sites and sites identified on a brownfield register are deliverable.
- 9.44 Whatever form the “clear evidence” takes, this must be prepared at the same time as the housing land supply position statement and, in accordance with the PPG, should be consulted on if the LPA is not to rely upon ‘after the event’ justification of the kind criticised in the Woolpit appeal decision as we have explained above. Fylde Council has failed to provide the clear evidence necessary and consult on it. For the reasons set out earlier this results in stakeholders not being able to make representations on the full case.
- 9.45 Despite our significant concern on the limited process to date, we have assessed the Council’s supply within the context of the revised NPPF and the updated PPG which we now set out.

10. Contested Supply

10.1 The APS sets out a number of components of supply which we now assess and we make a number of deductions. At the outset it is important to state that excluding sites from the 5 year supply is not a reflection on planning aspects of the sites as in the vast majority they are allocated sites to be delivered by 2032. Their exclusion from the 5 year supply is based on Government guidance which seeks to ensure a robust housing land supply and the evidence required is a high test. Therefore, we do not doubt the vast majority of these sites will deliver homes in the plan period, but crucially not in the next 5 years.

10.2 We now assess the sites.

Site 1 – Valentines Kennels (capacity = 114 dwellings, contribution to the five year supply = 114 dwellings)

10.3 The APS states:

“Local Plan allocated site. Council resolved at committee 15/1/2020 to approve application, subject to S106, adoption of shadow HRA (agreed) and planning conditions, for full planning permission for two storey c2 care village with 205 bedrooms, communal lounge and dining areas, residents library, cinema room and salon plus outside recreation area and car parking. Equivalent to 114 dwelling units in accordance with PPG.”

10.4 The application has a resolution to approve at the January 2020 Planning Committee subject to a Section 106 agreement. Therefore, at the base date there is not a planning permission and it should not be considered deliverable for the purposes of this APS. We are now some 6 months after committee and there is no correspondence on the planning file after 18th November 2019 and there is no evidence in the APS on progress with the Section 106 agreement. From experience as a planning consultancy working on development projects across the country, the lack of a signed Section 106 6 months after a resolution to grant does raise concerns. The main reason is usually viability which if not agreed can result in the permission not being issued or if a change is agreed that it returns to planning committee.

10.5 We also note that the Land Registry details (**Appendix HLS11**) which has a restrictive covenant on the site. There are 6 covenants, the first 2 being:

1. Not to erect on any part of the Property hereby conveyed any buildings erections or fixtures other than those intended to be used and in fact used in

connection with the use of the land for the carrying on of the business of a market gardener poultry keeper kennel keeper or grazier

2. Not to erect any private dwellinghouse on the Property

10.6 We would expect the LPA to have set out clear evidence on this issue and how the permission can be implemented with such covenants.

10.7 Therefore at this stage in the process, it cannot be considered deliverable until a planning permission is issued and confirmation that the site is available. We discount the 114 dwellings.

Site 2 - Jubilee House, East Beach, Lytham (capacity = 20 dwellings, contribution to the five year supply = 20 dwellings)

10.8 Full planning permission was granted in August 2013 for remodelling of an existing office block and the erection of 20 apartments. The permission was part implemented, with the completion of the office works in March 2015. No work on the residential element has commenced. The applicant advised Emery Planning in 2018 as part of our evidence for a planning appeal (**Appendix HLS1**) that the residential component is on hold until suitable funding streams can be secured. There were also issues with car parking capacity on the site as the office development is now fully occupied.

10.9 There is no evidence at all in the APS to counter our specific evidence from 2018 on the site being delivered and therefore we discount the 20 dwellings.

Site 3 - HS11 – The Galleries, 2-4 Kingsway, Lytham St Annes (capacity = 9 dwellings, contribution to the five year supply = 9 dwellings)

10.10 Full planning permission was granted November 2015 with a requirement for development to commence by November 2018. The property remains in use as auction rooms (**Appendix HLS2**) (currently closed due to Covid19) and the permission was not implemented. The property has been marketed for sale since November 2015 (**Appendix HLS2**) for commercial purposes (with the benefit of the planning permission), indicating that the applicant, who also owns the auction business, does not intend to bring forward the residential redevelopment themselves.

10.11 Application 18/0966 was then approved which in essence renews the previous consent. The site continues to be marketed at the time of writing (**Appendix HLS2**).

10.12 Given the site has had a consent for 5 years, has been marketed for in excess of 5 years and is still in use, we discount the 9 dwellings.

Site 4 - HS14 – Axa Lytham, (Gladman Care Homes, capacity = 65 dwellings, contribution to the five year supply = 65 dwellings)

10.13 Planning permission was granted (Feb 2018) for specialist accommodation comprising 65 apartments for the elderly (Use Class C2) (**Appendix HLS3**). As a residential institution falling outside of Class C3 of the use classes order it must be considered against the PPG.

“How can authorities count older people’s housing in the housing land supply?”

Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. Further guidance is set out in Housing for Older and Disabled People.

Paragraph: 035 Reference ID: 68-035-20190722

Revision date: 22 July 2019”

“How should plan-making authorities count specialist housing for older people against their housing requirement?”

Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published Census data.

Paragraph: 016a Reference ID: 63-016a-20190626

Revision date: 26 June 2019”

10.14 Using the same methodology as the LPA use for Valentines Kennels, there should be a discount of 30 dwellings.

Site 5 – Land at Roseacre, Wilding Lane, St Annes, capacity = 45 dwellings, contribution to the five year supply = 45 dwellings)

10.15 The Decision Notice on the application (**Appendix HLS4**) is dated 6th November 2016. Condition 1 states:

“The development must be begun not later than the expiration of three years beginning with the date of this permission.”

10.16 There has been no discharge of conditions and despite a later Section 106 agreement, the permission expired on 6th November 2019.

10.17 We discount 45 dwellings.

Site 6 - Hole in One, Forest Drive, Lytham St Annes capacity = 27 dwellings, contribution to the five year supply = 27 dwellings)

10.18 The application has a resolution to approve at the December 2019 Planning Committee subject to a Section 106 agreement. Therefore, at the base date there is not a planning permission and it should not be considered deliverable for the purposes of this APS. **Appendix HLS5** is an email exchange from the agent dated 25th January 2020 that is listed on the LPA's online planning file raising viability issues. There is no subsequent correspondence so notwithstanding the base date point, there is concerns on viability.

10.19 We discount the 27 dwellings.

Site 7 - Cropper Road East, Whitehills - capacity = 105 dwellings, contribution to the five year supply = 105 dwellings)

10.20 The outline planning application was submitted in February 2015 and the decision was issued on 11th March 2020 (**Appendix HLS6A**). Condition 1 states that the timescale on the permission are:

[a] The expiration of five years from the date of this permission; or

[b] The expiration of two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter approved.

10.21 As set out earlier the definition of “deliverable” is set out on page 66 of the 2019 Framework and states:

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.” (our emphasis)

10.22 It should be noted that the APS states:

“Local Plan allocated site. Outline planning permission with access applied for granted 11/3/2020. Applicant’s response to pre-consultation email endorses the Council’s projection but notes that the rate of delivery will depend on the developer who takes on the site.”

10.23 Therefore there is no clear evidence on delivery. The applicant in this case states that *“the rate of delivery will depend on the developer who takes on the site”*. Therefore the site needs to be:

- Marketed;
- If a buyer is found, a sale proceeds and is completed;
- The chosen developer prepares and submits a reserved matters application;
- The reserved matters is approved;
- Works to commence development and build infrastructure before any completions.

10.24 There could not be a clearer example of a site not having clear evidence and not being in accordance with part (b) of the Framework and such sites have been consistently removed by Inspectors and the Secretary of State.

10.25 We discount the 105 dwellings.

Site 8 – MUS2 - Whyndyke Farm (Oyston Developments, capacity = 1310 dwellings, contribution to the five year supply = 30 dwellings)

10.26 Whyndyke is a strategic site within Fylde but on the edge of Blackpool. The agent for the owner advised the Local Plan Examination of their lead in times and delivery rates. In their statement for Matter 5 (**Appendix HLS7**) they state:

“In particular Queensway and Whyndyke Garden Village have each taken many years to progress to a reserved matters/outline application stage with no certainty of when delivery is likely to commence. Both are subject to s106 agreements of some complexity with the former reliant upon the delivery of a link road for which funding is not yet guaranteed and the latter the subject of ongoing negotiations of a cross boundary nature which has hindered progress for many years.

At the time of preparing this statement, the s106 agreement for Whyndyke Farm remained incomplete despite first being supported by Committee in June 2015. The delay is not due to the developer, rather it relates to ongoing discussions between the other interested parties.

It is therefore not clear when either site will commence.”

10.27 In their statement to the Stage 3 hearing (**Appendix EP7**), they state:

“Given the ongoing failure of the respective local planning authorities, namely Fylde and Blackpool to agree to the terms of the s106 agreement for Whyndyke Farm, questions must begin to be asked about the extent to which this site will make a full contribution to the housing land supply of Fylde over the plan period.”

10.28 The planning application (11/0221) was submitted in March 2011 and the decision (**Appendix EP7**) was issued on 5th June 2018. Condition 1 requires the first reserved matters application be submitted within three years from the date of this permission. All subsequent reserved matters applications shall be submitted no later than 12 years from the date of this permission and shall be commenced within two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter approved. No reserved matters application has been submitted. On that point alone it should be excluded based on the same reasons as Site 6 above being contrary to part (b) of the deliverability test in the NPPF.

10.29 This is also a site that has been in the AMR's since at least 2013 yet there has been no significant progress. Inspector Boniface made the following conclusion in his report to the 2019 APS:

“MUS2 Whyndyke Farm, Preston New Road, Whitehills 23.

This is a large site for some 1,310 dwellings. Outline planning permission was granted in June 2018, some 7 years after the site was first mooted. Whilst only 30 dwellings have been included in the 5-year trajectory in the final year, 2023/2024, the response from the developer is at best "lukewarm" indicating that no progress has been made since 2018. Here, there is not the clear evidence required to support the inclusion of this site and the supply figure should be reduced by removing 30 units."

10.30 There is no evidence to justify the continual inclusion of the site in Year 5 in the AMRs and now the APS. We therefore exclude the 30 dwellings from Year 5.

Site 9 Cropper Road West (HSS5) (Wainhomes and BAK, capacity = 442 dwellings, contribution to the five year supply = 169 dwellings)

10.31 This is a site in the adopted Local Plan. Wainhomes control the majority and BAK Developments control a parcel. Both parties have applications submitted and pending, which are:

"17/0779 - Outline Application with access from Cropper Road and School Road for the proposed demolition of existing buildings and structures and residential development for up to 350 dwellings together with associated works and infrastructure".

19/0284 - Residential development of 142 dwellings with associated landscaping and infrastructure"

10.32 The site was allocated and both parties maintain the sites are developable in the plan period. However following the allocation and the submission of the applications, the Environment Agency revised its flood mapping and a large proportion of the site was reclassified as Flood Zone 3 – see below.

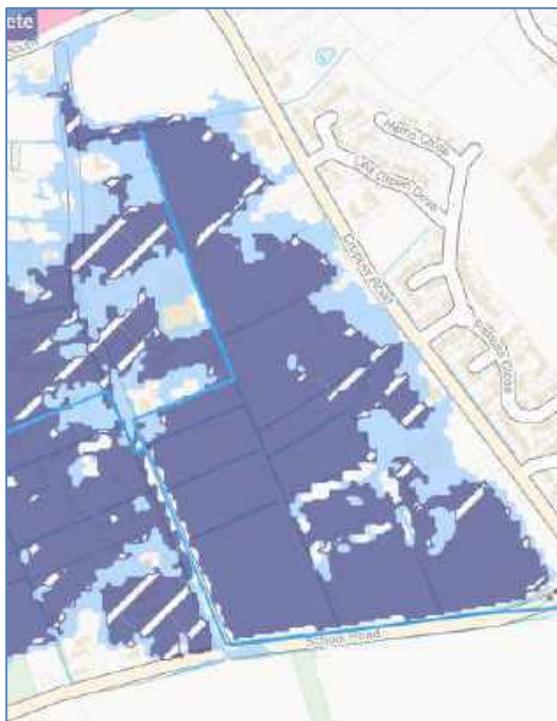
Extract from FRA

According to the EA Flood Map for Planning (Rivers and Sea) (**Figure 2**) the site is located in Flood Zone 1.



Figure 2: Environment Agency Flood Map for Planning (Rivers & Sea)
(Source: EA website)

Revised EA Flood Map



10.33 In our response to the 2019 APS, we stated:

"Both applicants are seeking resolution but for the last 9 months this has not been achieved. Further detail is provided below."

10.34 Inspector Boniface, in his report to the 2019 APS stated:

"HSS5 Cropper Road West, Whitehills (Site 1) & Cropper Road West (Bambers Lane), Whitehills (Site 2) 24. These are allocated sites in the Local Plan. An outline planning application for Site 1 has been submitted for up to 350 units and a full planning application has been submitted for Site 2 for up to 142 units. For Site 1 the trajectory shows delivery of 10 units in Year 4 and 30 units in Year 5. For Site 2 the trajectory shows 15 units in Year 3, 30 units in Year 4 and 30 units in Year 5. It appears that consultants for the developers have prepared Design Codes for these sites. The Environment Agency (EA) has issued a holding objection to the development of these sites following a reassessment of the flood risk. The applicants are responding to the EA and the Council consider the issues are technical and capable of resolution. On balance, given the progress to date, these allocations appear realistic."

10.35 It is now 12 months on and the EA maintain their objection.

Application 17/0779

10.36 The application was validated on the 11th September 2017 and in their letter dated 2nd August 2018 the Environment Agency provided a response on the application. The letter (**Appendix HLS8**) states:

"Due to a change in circumstances in relation to flood risk, we now wish to object to the application until a satisfactory FRA has been submitted to address this issue."

10.37 Further information was submitted by the Applicant and a further response from the EA dated 2nd July 2019 (**Appendix HLS8**) has confirmed that their objection remains. The applicant is continuing to seek to address the objection but for the purposes of the APS the site should be excluded from the 5 year supply. If there is a resolution it may impact on the developable area and the number of dwellings that could be accommodated.

10.38 Therefore it is necessary to discount 70 dwellings from years 3, 4 and 5. The site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.

Application 19/0284

10.39 This application was submitted in April 2019 by BAK Building Contracts Ltd. As with Application 17/0779 the Environment Agency objects to the application (**Appendix EP8**). For the same reasons as our client's site, for the purposes of the APS the site should be excluded from the 5 year supply. We therefore discount 99 dwellings from years 2, 3, 4 and 5.

10.40 As with our client's parcel, the site remains developable in the plan period and if the EA objection is lifted in the next 12 months then the site could be included in the 2021 APS.

Site 10 - HSS12 – Land North of Freckleton Bypass, Warton (Warton East Developments Ltd, capacity = 120 dwellings, contribution to the five year supply = 120 dwellings)

10.41 Outline consent was granted on Appeal in February 2017 for Warton East Developments Ltd. The APS states:

"Local Plan allocated site. Outline planning permission for 350 dwellings. Reserved matters application received 24/1/2020 for 350 dwellings for developer Countryside Properties; also full planning application received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties are known to have higher delivery rates, so the figure shown are considered very conservative"

10.42 Therefore the site has no reserved matters consent at the base date so should be excluded on the basis of part (b) of the definition of deliverable in the Glossary to the NPPF. It should also be noted that the application also has an objection by the Highway Authority and Natural England (Appendices HLS9). We discount the 120 dwellings at this stage. That can of course be reviewed in the APS next year.

Site 11 - HSS13 – Clifton House Farm, Lytham Road, Warton (Hallam Land Management, capacity = 96 dwellings, contribution to the five year supply = 75 dwellings)

10.43 Outline consent was granted on Appeal in February 2017. Reserved Matters was approved on 23rd March 2020. A further duplicate Reserved Matters application is pending. The applicant is Hallam Land Management who are not housebuilders. They are clearly seeking to obtain a implementable consent to ensure the outline permission does not expire.

10.44 Therefore there is no clear evidence on delivery and the site needs to be:

- Marketed;
- If a buyer is found, a sale proceeds and is completed;
- The chosen developer prepares and submits a reserved matters application or further application to vary house types;
- The reserved matters and/or further applications are approved;
- Works to commence development and build infrastructure before any completions.

10.45 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework. We discount the 75 dwellings.

Site 12 - Brook Mount, 4 Lytham Road, Warton, capacity = 26 dwellings, contribution to the five year supply = 26 dwellings)

10.46 The APS states:

“Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019”.

10.47 The site has no permission at the base date so must be excluded.

Site 13 - Campbells Caravans, Blackpool Road, Kirkham, capacity = 30 dwellings, contribution to the five year supply = 30 dwellings)

10.48 The APS states:

“Local Plan allocated site. Outline planning permission for 30 dwellings approved with S106 17/5/2019.”

10.49 As with other sites, there is no clear evidence on delivery and having an outline planning application does not justify inclusion as a deliverable site based on the Glossary in the NPPF. Therefore the site needs to be:

- Marketed;
- A sale proceeds and is completed if a buyer can be found;
- The chosen developer prepares and submits a reserved matters application;
- The reserved matters is approved;
- Works to commence development and build infrastructure before any completions.

10.50 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework. We discount the 30 dwellings.

Site 14 - Former Wesham Park Hospital, Derby Road, Wesham, capacity = 51 dwellings, contribution to the five year supply = 51 dwellings)

10.51 The APS states:

“Outline planning application for 51 dwellings on previously-developed site within settlement. Principle of development accepted. Council’s Planning Committee resolved to grant outline permission on 18/3/2020 subject to S106 agreement relating to affordable housing, contributions for education and public open space. NHS Property Services announced through local press (4/6/2020) that demolition would commence on 8/6/2020 and take 5 months.”

10.52 Reference is made to an article in the local press. As with all the LPA’s evidence none of it is published as part of this APS which is not acceptable for the reasons set out earlier.

10.53 We enclose an article (**Appendix HLS10**) dated 5th June 2020.

“NHS Property Services, which has been tasked with the demolition, says the repurposing of the vacant site, in Derby Road, will help the NHS make significant savings on running costs and better use of the space.

After the site has been cleared, it is proposed that half of the land will be developed for new clinical use, with the local CCG having already indicated its aim to develop a new state of the art health centre, which would provide capacity for the two GP practices in Kirkham as well as a variety of community services.

The other half of the site has been determined to not be of use for clinical purposes and looks set to be made available for sale.”

10.54 As with other sites, there is no clear evidence on delivery and having an outline planning application does not justify inclusion as a deliverable site based on the Glossary in the NPPF. Therefore the site needs to be:

- Marketed;
- A sale proceeds and is completed if a buyer can be found;
- The chosen developer prepares and submits a reserved matters application;
- The reserved matters is approved;
- Works to commence development and build infrastructure before any completions.

10.55 This is a further example of a site not having clear evidence and not being in accordance with part (b) of the Framework and why they should not be included.

10.56 We discount the 51 dwellings.

Site 15 - Land North of North View Farm, Wrea Green (capacity = 21 dwellings, contribution to the five year supply = 21 dwellings)

10.57 The APS states:

“Local Plan allocated site. Planning Committee resolved 12/2/2020 to grant full planning permission subject to S106. Production of the S106 has been undertaken and matters of detail within it are being agreed prior to being finalised and signed.”

10.58 The site has no permission at the base date so should be excluded.

Site 16 - Cobweb Barn, Oak Lane, Newton (capacity = 30 dwellings, contribution to the five year supply = 30 dwellings)

10.59 An outline application for 30 dwellings was approved in July 2017. However a new planning application (2003115/FUL has been submitted but not determined at the base date so should be excluded.

The impact of Covid-19 on housing land supply

10.60 The Covid-19 pandemic in the UK will have an impact in terms of housing land supply. Firstly, build rates in 2020/21 will be lower than those predicted before the pandemic. This is because following the Prime Minister’s announcement of the ‘lockdown’ in the UK on 23rd March 2020 construction on many sites ceased. Construction did not re-commence on those sites which had closed until late April / early May 2020. Therefore, there was at least 5 weeks when work was not being undertaken on many housing sites. Even though construction has now resumed on many sites, build rates will still be reduced due to social distancing on site and the supply of trade and materials. Build rates could be reduced further in 2020/21 because of the economic recession and reduced consumer confidence.

10.61 Secondly, in terms of the definition of “deliverable”, any “clear evidence” provided by the Council to support the deliverability of sites cannot be relied on unless it has taken into account the impact that the Covid-19 will have on build rates.

10.62 Within this context, we refer to a recent decision dated 9th April 2020 regarding an appeal made by Welbeck Strategic Land against the decision of Wokingham Borough Council to refuse to grant outline planning permission for up to 118 dwellings at land north of Nine Mile Ride, Finchampstead, Berkshire¹². The public inquiry into the appeal took place in February 2020. Following the close of the inquiry, Inspector Christina Downes asked the main parties whether they wished to comment on any implications that the Covid-19 pandemic may have in terms of their evidence on housing delivery. The Appellant and Wokingham Council responded. Paragraphs 109-111 of the appeal decision state:

“109. The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lock-down will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.

110. The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.

111. At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites.”

10.63 On this basis, the build rate expected on the sites should be reduced to the extent that there would be a reduction in the deliverable supply. Indeed, where the Council reflects the response from the developer on Clifton House Farm, Lytham Road, Warton on the impact of Covid19 with a corresponding reduction in build rates. This is not unique to this site. At this stage we agree with the LPA that in many cases the loss of completions in the 3 months of lockdown can be recovered within the 5 year period. Therefore we have made a reduction on sites in the supply where supply is expected in all 5 years so delays in the last 3 months would fall in year 6. They are:

- Blackfield End Farm, Warton – 5 dwellings;
- Land North of Blackpool Road, Kirkham – 5 dwellings; and,

¹² PINS ref: 3238048

- Land at Brookfarm, Dowbridge, Kirkham – 5 dwellings.

10.64 A response from developers or the HBF, if they are even aware of this consultation, can advise on build rates or other changes. We consider that Covid19 will have a greater impact but this will only be established in the coming months. We would expect build rates to reduce and that will be accounted for in the next APS.

11. Conclusions

11.1 The Council's deliverable supply is claimed to be 2,991 dwellings. This equates to 6.01 years applying Liverpool and the 10% buffer. We conclude the LPA is wrong on how they have calculated the shortfall at the base date and based on Policy H1 it should be 2,331 dwellings. With the 10% buffer the 5 year requirement is 2,564 dwellings, which equates to 513 dwellings. This would reduce the supply to 5.83 years.

11.2 The above figures assume that all the sites in the supply are deliverable. However, we have undertaken a detailed assessment of the supply to establish what we consider to be the true supply. We calculate the deliverable supply to be 2,074. The differences in the supply are as follows:

Site Ref	Deliverable Supply (Council)	Deliverable Supply (Emery)
1	Valentines Kennels, Wilding Lane	-114
2	Jubilee House, East Beach, Lytham	-20
3	The Galleries, 2-4 Kingsway, Lytham St Annes	-9
4	Axa Lytham	-30
5	Land at Roseacre, Wilding Lane, St Annes	-45
6	Hole in One, Forest Drive, Lytham St Annes	-27
7	Cropper Road East, Whitehills	-105
8	Whyndyke Farm	-30
9	Cropper Road West (HSS5)	-169
10	Land North of Freckleton Bypass, Warton	-120
11	Clifton House Farm, Lytham Road, Warton	-75
12	Brook Mount, 4 Lytham Road, Warton	-26

13	Campbells Caravans, Blackpool Road, Kirkham	-30
14	Former Wesham Park Hospital, Derby Road, Wesham	-51
15	North of North View Farm, Wrea Green	-21
16	Cobweb Barn, Oak Lane, Newton	-30
17	Impact of Covid19	-15
Total		2,074

11.3 We now calculate the years supply.

		APS	Emery
A	Annual requirement	479	415
B	Past shortfall at 1 st April 2020	-150	614
C	Amount of past shortfall to be addressed in the five year period	-150	256
D	Total five year requirement (A X 5 + C)	2,245	2,331
E	Requirement plus 10% buffer (D + 10%)	2,470	2,564
F	Annual requirement plus buffer (E / 5 years)	494	513
G	Deliverable Supply	2,991	2,074
H	Years Supply	6.01	4.05

11.4 Our assessment is that the supply is **4.05 years**.

12. Appendices

- HLS1. Jubilee House, East Beach, Lytham
- HLS2. The Galleries, 2-4 Kingsway, Lytham St Annes
- HLS3. Axa Lytham
- HLS4. Land at Roseacre, Wilding Lane, St Annes
- HLS5. Hole in One, Forest Drive, Lytham St Annes
- HLS6. Cropper Road East, Whitehills
- HLS7. Whyndyke Farm
- HLS8. Cropper Road West (HSS5)
- HLS9. Land North of Freckleton Bypass, Warton
- HLS10. Former Wesham Park Hospital, Derby Road, Wesham
- HLS11. Valentines Nursery Land Registry

HLS1

Re: Project Status Update (March 2018) - Jubilee House, East Beach, Lytham.

Telephone conversation with EDG Properties Ltd (Andrew – 07747 561598), 2:30pm Thursday 1st March 2018.

Spoke to the applicant who informed me that the office component of app ref: 13/0001/FULL had been implemented, completed and is now fully let. The residential component is on hold while project finance is being sought.

Furthermore, the full occupancy of the office building has created an issue with bringing the residential element forward, in that the apartment building would be on land currently utilised as car parking by the office tenants, and the car park is at capacity.

The applicant was unable to indicate as to when the scheme would be completed, however due to the partial implementation of the planning permission the applicant's view is that there is no time limit for the remainder of the permission to be implemented.

HLS2



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If approaching from Lytham... Follow the promenade[a584] passing the windmill on Lytham green. Continuing for about 1 1/2 miles you will pass The White Church on the left. About 100 yards further, turn right at the mini roundabout into Woodlands Rd. Take the first turn on the left into **KINGSWAY**. The auction room is situated 100 yards on the left hand side.

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KINGSWAY, ANSDELL, LYTHAM ST ANNES

LOCATION

The residential re-development opportunity occupies a sought after location in the affluent town of Ansdell, Lytham St Annes.

It is located on Kingsway, which is accessed off Woodlands Road. It is within walking distance of the train station, local supermarket, local shops and amenities. The surrounding areas also include dense residential areas. Ease of access is available on the coast road / Promenade and towards Fairhaven Lake. Ease of commuting is available towards Lytham and St Annes as well as Blackpool.

PROPOSED RE-DEVELOPMENT

We confirm the opportunity to purchase this building and site that has Full Planning Permission Granted for the conversion and extension of the existing building to provide 10 Apartments (6 no. One Bedroom and 4 no. Two Bedroom), including split-level rear extension, alterations to the shop front and provision of off-street car parking (off the side road).

Garages: there are 6 no. garages included in the sale.

Plans and planning information is available from the Fylde Council planning website via Reference 15/0486. This information is also available via our office.

PRESENT ACCOMMODATION

The present building comprises an open plan auction room, with a shop front and ancillary areas:

Ground Floor GIA: 300 SQ M (3,229 SQ FT)

Uppers floors: not measured

DESCRIPTION

The present building comprises Kingsway Auction Rooms providing an open plan auction room, with a shop front and ancillary areas. There is additional accommodation to the upper floors.

There are car parking spaces (off the side road), the side road also leads to 6 no. garages included in the sale.

VIEWING ARRANGEMENTS

Strictly via prior appointment through Duxburys Commercial on 01253 316919.

BUSINESS RATES

To be confirmed.

EPC

To be confirmed

VAT

All prices quoted are exclusive of VAT but may however be subject to VAT at the prevailing rate.

Disclaimer

The sales particulars have been produced with information provided by the owner/occupier or landlord and are made in good faith without any responsibility whatsoever on the part of Duxburys Commercial. It is for the purchaser or as the case may be the lessee to satisfy themselves by inspection or otherwise, as to the accuracy or fullness of the information. They must not in entering into any contract or incurring costs or otherwise rely upon these particulars as statements or representations of facts.



Misrepresentation Act 1967: Duxburys Commercial, as agents for the vendor or, as the case may be, lessor (the "Vendor") and for themselves, give notice that:

- (1) These particulars are provided merely as a general guide to the property. They are not and shall not hereafter become part of any other contract.
 - (2) The Statements herein are made in good faith without any responsibility whatsoever on the part of the Vendor, Duxburys Commercial or their servants. It is for the purchaser or as the case s Commercial nor its servants has any authority, express or implied, to make or give any representations or warranties in respect of the property.
 - (3) In the event of any inconsistency between these particulars and the Conditions of Sale, the latter shall prevail.
 - (4) Nothing in these particulars should be deemed to be a statement that the property is in good condition or that any of the facilities are in working order.
- Note: Duxburys Commercial has not made any investigations into the existence or otherwise of any issues concerning pollution and potential land, air or water contamination. The purchaser is responsible in making his own enquiries in this regard.

FOR SALE RESIDENTIAL RE-DEVELOPMENT SITE

THE GALLERIES (BUILDING & SITE)
2 - 4 KINGSWAY
ANSELL
LYTHAM ST ANNES
FY8 1AB

- CONVERSION AND EXTENSION OF EXISTING BUILDING TO PROVIDE 10 NO. APARTMENTS (SIX ONE BEDROOM & FOUR TWO BEDROOM) INCLUDES SPLIT-LEVEL REAR EXTENSION, ALTERATIONS TO SHOP FRONT & PROVISION OF OFF-STREET CAR PARKING
- FULL PLANNING PERMISSION GRANTED

GUIDE PRICE: OFFERS IN THE REGION OF £390,000



Unit 8, Metropolitan Business Park, Blackpool, Lancashire, FY3 9LT
t: 01253 316919 e: enquiries@duxburyscommercial.co.uk
f: 01253 765260 w: www.duxburyscommercial.co.uk

KINGSWAY, ANSDELL, LYTHAM ST ANNES

LOCATION

The residential re-development opportunity occupies a sought after location in the affluent town of Ansdell, Lytham St Annes.

It is located on Kingsway, which is accessed off Woodlands Road. It is within walking distance of the train station, local supermarket, local shops and amenities. The surrounding areas also include dense residential areas. Ease of access is available on the coast road / Promenade and towards Fairhaven Lake. Ease of commuting is available towards Lytham and St Annes as well as Blackpool.

PROPOSED RE-DEVELOPMENT

We confirm the opportunity to purchase this building and site that has Full Planning Permission Granted for the conversion and extension of the existing building to provide 10 Apartments (6 no. One Bedroom and 4 no. Two Bedroom), including split-level rear extension, alterations to the shop front and provision of off-street car parking (off the side road).

Garages: there are 6 no. garages included in the sale.

Plans and planning information is available from the Fylde Council planning website via Reference 15/0486. This information is also available via our office.

PRESENT ACCOMMODATION

The present building comprises an open plan auction room, with a shop front and ancillary areas:

Ground Floor GIA: 300 SQ M (3,229 SQ FT)

Uppers floors: not measured

DESCRIPTION

The present building comprises Kingsway Auction Rooms providing an open plan auction room, with a shop front and ancillary areas. There is additional accommodation to the upper floors.

There are car parking spaces (off the side road), the side road also leads to 6 no. garages included in the sale.

VIEWING ARRANGEMENTS

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BUSINESS RATES

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 - (2) The Statements herein are made in good faith without any responsibility whatsoever on the part of the Vendor, Duxburys Commercial or their servants. It is for the purchaser or as the case s Commercial nor its servants has any authority, express or implied, to make or give any representations or warranties in respect of the property.
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 - (4) Nothing in these particulars should be deemed to be a statement that the property is in good condition or that any of the facilities are in working order.
- Note: Duxburys Commercial has not made any investigations into the existence or otherwise of any issues concerning pollution and potential land, air or water contamination. The purchaser is responsible in making his own enquiries in this regard.

HLS3

Mr Robert Buffham
Senior Development Officer
Fylde Borough Council
Town Hall
St Annes on Sea
Lancashire
FY8 1LW

31st August 2017

Dear Sirs,

Proposed Development for Specialist Accommodation for the Elderly consisting of apartments with care, communal facilities, parking and associated private amenity space (Planning Portal Ref PP-06311670)

Further to our online application PP-06311670 submitted on 31st August 2017 for the proposed Development for Specialist Accommodation for the Elderly, please find attached a CD containing the following documentation which were uploaded as part of our on line application: -

1. Application letter, forms and certificates
2. Location Plan - 09992-P1-101
3. Site Context Plan - 09992-P1-102
4. Site Plan - 09992-P1-103
5. Footprint comparison Plan - 09992-P1-104
6. Comparative Context Elevations - 09992-P1-111/112/113/114
7. Floor Plans - 09992-P1-121/122
8. Typical Apartment Layouts - 09992-P1-123
9. Building Elevations - 09992-P1-131
10. Building Appearance - 09992-P1-132
11. Landscape Strategy - 09992-P1-141
12. Planning Statement
13. Care Statement
14. Design and Access Statement
15. Parking Statement
16. Views Document
17. Transport Statement
18. Noise Assessment
19. Ecology Appraisal
20. Arboricultural Assessment
21. Phase 1 SI Report
22. FRA
23. Drainage Strategy
24. Drainage Layout – 09992-652-P0
25. Statement of Community Involvement
26. Topographical Survey Drawings

A cheque for the sum of £24,569.00 (Twenty four thousand, five hundred and sixty nine Pounds) made payable to Fylde Borough Council is attached to this letter.

We trust the enclosed information is sufficient to enable our application to be validated at your earliest opportunity, however, should you have any queries or require any further information please do not hesitate to contact the writer.

Yours faithfully

Andrew Green
Project Manager
Email: a.green@gladman.co.uk
Tel: 01260 288820

Application for Planning Permission.
Town and Country Planning Act 1990

Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

1. Applicant Name, Address and Contact Details

Title:	<input type="text" value="Mr"/>	First Name:	<input type="text" value="Andrew"/>	Surname:	<input type="text" value="Green"/>
Company name:	<input type="text" value="Gladman Care Homes Ltd"/>				
Street address:	<input type="text" value="Gladman House"/>				
	<input type="text" value="Alexandria Way"/>	Telephone number:	<input type="text" value="01260288820"/>		
	<input type="text" value="Congleton Business Park"/>	Mobile number:	<input type="text" value="01260288800"/>		
Town/City:	<input type="text" value="Congleton"/>	Fax number:	<input type="text"/>		
Country:	<input type="text" value="Cheshire"/>	Email address:	<input type="text" value="a.green@gladman.co.uk"/>		
Postcode:	<input type="text" value="CW12 1LB"/>				
Are you an agent acting on behalf of the applicant?		<input type="radio"/> Yes <input checked="" type="radio"/> No			

2. Agent Name, Address and Contact Details

No Agent details were submitted for this application

3. Description of the Proposal

Please describe the proposed development including any change of use:

Has the building, work or change of use already started? Yes No

4. Site Address Details

Full postal address of the site (including full postcode where available)

House: Suffix:

House name:

Street address:

Town/City:

Postcode:

Description of location or a grid reference
(must be completed if postcode is not known):

Easting:

Northing:

Description:

The development is on the site of the former AXA Technology Services Building/West Cliffe Centre. The building is to be demolished under a separate application 17/0411.

5. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application? Yes No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title: First name: Surname:

Reference:

Date (DD/MM/YYYY): (Must be pre-application submission)

Details of the pre-application advice received:

Advices was give at our meeting on 7/06/17 and via a series of email from the case officer. Please refer to the planning statement and statement of Community Involvement submitted with this application for detail of the pre-application advice given

6. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicle access proposed to or from the public highway? Yes No

Is a new or altered pedestrian access proposed to or from the public highway? Yes No

Are there any new public roads to be provided within the site? Yes No

Are there any new public rights of way to be provided within or adjacent to the site? Yes No

Do the proposals require any diversions/extinguishments and/or creation of rights of way? Yes No

If you answered Yes to any of the above questions, please show details on your plans/drawings and state the reference of the plan(s)/drawings(s)

7. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste? Yes No

If Yes, please provide details:

7. Waste Storage and Collection

Have arrangements been made for the separate storage and collection of recyclable waste?

Yes No

If Yes, please provide details:

Separate receptacles to be provide for recycling

8. Authority Employee/Member

With respect to the Authority, I am:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

Do any of these statements apply to you?

Yes No

9. Materials

Please state what materials (including type, colour and name) are to be used externally (if applicable):

Boundary Treatments - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Doors - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Lighting - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Not submitted

Roof - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Vehicle Access - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Walls - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Windows - description:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

OTHER - description:

9. Materials

Type of other material:

Description of *existing* materials and finishes:

Description of *proposed* materials and finishes:

Please refer to Design and Access Statement submitted with the application

Are you supplying additional information on submitted plan(s)/drawing(s)/design and access statement?

Yes No

If Yes, please state references for the plan(s)/drawing(s)/design and access statement:

Please refer to Design and Access Statement submitted with the application

10. Vehicle Parking

Please provide information on the existing and proposed number of on-site parking spaces:

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	0	36	36
Disability spaces	0	6	6
Other (e.g. bus)	0	10	10
Short description of Other	new car parking spaces off Wharf street for the use of local residents		

11. Foul Sewage

Please state how foul sewage is to be disposed of:

Mains sewer Package treatment plant Unknown
Septic tank Cess pit Other

Are you proposing to connect to the existing drainage system?

Yes No Unknown

If Yes, please include the details of the existing system on the application drawings and state references for the plan(s)/drawing(s):

Please refer to the Drainage Strategy submitted as part of this application

12. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)

Yes No

If Yes, you will need to submit an appropriate flood risk assessment to consider the risk to the proposed site.

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes No

Will the proposal increase the flood risk elsewhere?

Yes No

How will surface water be disposed of?

Sustainable drainage system Main sewer Pond/lake
 Soakaway Existing watercourse

13. Biodiversity and Geological Conservation

To assist in answering the following questions refer to the guidance notes for further information on when there is a reasonable likelihood that any important biodiversity or geological conservation features may be present or nearby and whether they are likely to be affected by your proposals.

13. Biodiversity and Geological Conservation

Having referred to the guidance notes, is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, OR on land adjacent to or near the application site:

a) Protected and priority species

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

b) Designated sites, important habitats or other biodiversity features

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

c) Features of geological conservation importance

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

14. Existing Use

Please describe the current use of the site:

The site is currently vacant

Is the site currently vacant?

- Yes
 No

If Yes, please describe the last use of the site:

AXA Technology Services Building

When did this use end (if known) (DD/MM/YYYY)?

Does the proposal involve any of the following?

If yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated?

- Yes
 No

Land where contamination is suspected for all or part of the site?

- Yes
 No

A proposed use that would be particularly vulnerable to the presence of contamination?

- Yes
 No

15. Trees and Hedges

Are there trees or hedges on the proposed development site?

- Yes
 No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

- Yes
 No

If Yes to either or both of the above, you may need to provide a full Tree Survey, at the discretion of your local planning authority. If a Tree Survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

16. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or waste?

- Yes
 No

17. Residential Units

Does your proposal include the gain or loss of residential units?

- Yes
 No

Market Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					

Market Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					

17. Residential Units

Market Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Market Housing Total

Social Rented Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Social Housing Total

Intermediate Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Intermediate Housing Total

Key Worker Housing - Proposed					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Proposed Key Worker Housing Total

Market Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Market Housing Total

Social Rented Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Social Housing Total

Intermediate Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Intermediate Housing Total

Key Worker Housing - Existing					
	Number of bedrooms				
	1	2	3	4+	Unknown
Bedsits/Studios					
Cluster Flats					
Flats/Maisonettes					
Houses					
Live-Work Units					
Sheltered Housing					
Unknown					

Existing Key Worker Housing Total

18. All Types of Development: Non-residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace?

Yes No

18. All Types of Development: Non-residential Floorspace

Use Class/type of use	Existing gross internal floorspace (square metres)	Gross internal floorspace to be lost by change of use or demolition (square metres)	Total gross new internal floorspace proposed (including changes of use) (square metres)	Net additional gross internal floorspace following development (square metres)
C2 - Residential institutions	0	0	7,299	7,299
Total	0	0	7,299	7,299

For hotels, residential institutions and hostels, please additionally indicate the loss or gain of rooms:

Use Class/types of use	Existing rooms to be lost by change of use or demolition	Total rooms proposed (including changes of use)	Net additional rooms

19. Employment

If known, please complete the following information regarding employees:

	Full-time	Part-time	Equivalent number of full-time
Proposed employees			18

20. Hours of Opening

If known, please state the hours of opening (e.g. 15:30) for each non-residential use proposed:

Use	Monday to Friday		Saturday		Sunday and Bank Holidays		Not Known
	Start Time	End Time	Start Time	End Time	Start Time	End Time	
C2							<input checked="" type="checkbox"/>

21. Site Area

What is the site area?

0.79	hectares
------	----------

22. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

N/A

Is the proposal for a waste management development?

Yes No

If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make clear what information it requires on its website.

23. Hazardous Substances

Is any hazardous waste involved in the proposal?

Yes No

A. Toxic substances

Amount held on site

		Tonne(s)
--	--	----------

B. Highly reactive/explosive substances

Amount held on site

		Tonne(s)
--	--	----------

23. Hazardous Substances

C. Flammable substances (unless specifically named in parts A and B)

Amount held on site

Tonne(s)

24. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

The agent The applicant Other person

25. Certificates (Certificate A)

Certificate of Ownership - Certificate A
Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14

I certify/The applicant certifies that on the day 21 days before the date of this application nobody except myself/the applicant was the owner (*owner is a person with a freehold interest or leasehold interest with at least 7 years left to run*) of any part of the land to which the application relates, and that none of the land to which the application relates is, or is part of, an agricultural holding ("*agricultural holding*" has the meaning given by reference to the definition of "*agricultural tenant*" in section 65(8) of the Act).

Title: First name: Surname:

Person role: Declaration date: Declaration made

26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.



Date



Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

Full Planning Permission Approved with 106 Agreement

Part 1 - Particulars of Application

Application Number: 17/0738

Location: AXA DATA CENTRE, WEST CLIFFE, LYTHAM ST ANNES, FY8 5DR

Description: DEVELOPMENT OF SPECIALIST ACCOMMODATION FOR THE ELDERLY CONSISTING OF 65 APARTMENTS WITH CARE, COMMUNAL FACILITIES, PARKING AND ASSOCIATED PRIVATE AMENITY SPACE

Part 2 - Particulars of Decision

The Fylde Borough Council hereby give notice in pursuance of the provisions of the Town and Country Planning Act 1990 that **PERMISSION HAS BEEN GRANTED SUBJECT TO A 106 AGREEMENT** for the carrying out of development referred to in Part 1 hereof in accordance with the development proposal specified on your submitted application form and the relevant plan (s) subject to the following conditions(s) and reasons(s):

- 1 The development must be begun not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with the requirements of section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 This permission relates to the following plans:

- Location Plan drawing number 09992-P1-101.
- Site Plan drawing number 09992-P1-103 rev B.
- Building Elevations drawing number 09992-P1-131 rev B.
- Floor Plans 1 General Arrangement drawing number 09992-P1-121.
- Floor Plans 2 General Arrangement drawing number 09992-P1-122.
- Landscape Strategy drawing number 09992-P1-141 rev A.
- Comparative Elevations 1 09992-P1-111 rev A.
- Comparative Elevations 2 09992-P1-112 rev A.
- Comparative Elevations 1 09992-P1-113 rev A.
- Comparative Elevations 1 09992-P1-114 rev A.

Reason: To clarify the terms of this consent.

- 3 Notwithstanding the submitted details, prior to commencement of the development hereby approved, representative samples of the external construction materials shall be submitted to and

approved in writing by the Local Planning Authority. The approved details shall be used in construction of the development.

Reason: To provide sufficient clarity over the construction materials and in the interests of visual amenity for the development, in accordance with Policy HL2 of the Fylde Borough Local Plan.

- 4 Notwithstanding the submitted details, details of finished floor levels and external ground levels for the development shall be submitted to and approved in writing by the Local Planning Authority before any development at that plot takes place. The development shall thereafter be implemented in accordance with the duly approved details.

Reason: In order to ensure a satisfactory relationship between the new dwellings and their surroundings (including buildings and the street scene) and to ensure that the development is not at risk of flooding, in accordance with Policy HL2 and EP30 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 5 Notwithstanding the submitted details, prior to commencement of the development hereby approved, detailed design of the external balcony structures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason: To provide sufficient clarity over the construction materials and in the interests of visual amenity for the development, in accordance with Policy HL2 of the Fylde Borough Local Plan.

- 6 Notwithstanding the submitted details, prior to commencement of the development hereby approved, detailed design of the external bin store shall be submitted to and approved in writing by the Local Planning Authority. The development shall be constructed in accordance with the approved details.

Reason: To provide sufficient clarity over the construction materials and in the interests of visual amenity for the development, in accordance with Policy HL2 of the Fylde Borough Local Plan.

- 7 Notwithstanding the submitted details, prior to commencement of the development hereby approved, detailed design of all windows within the development shall be submitted to and approved in writing by the Local Planning Authority. The submitted details should provide for frame size and colour, heads and cills, and, a 75mm reveal. The development shall be constructed in accordance with the approved details.

Reason: To provide sufficient clarity over the construction materials and in the interests of visual amenity for the development, in accordance with Policy HL2 of the Fylde Borough Local Plan.

- 8 Prior to commencement of the development hereby approved, a scheme for construction of the site access and off site highway improvements works shall be submitted to and approved in writing by the Local Planning Authority. The off-site highway works shall include:
1. Improvements to facilitate the re-prioritisation of the Wharf Street and North Warton Street junction.

The approved scheme shall be implemented prior to first occupation of the development and retained thereafter

Reason: In order to secure improvements to the highway network to ensure safe and convenient access and circulation for vehicle traffic in the interests of road safety, in accordance with Policy HL2 and TR1 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 9 No development shall take place until a Construction Method Statement (CMS) has been submitted to and approved in writing by the Local Planning Authority. The CMS shall include details of the following: -

- The parking of vehicles of site operatives and visitors.
- Loading and unloading of plant and materials.

- Storage of plant and materials used in constructing the development.
- Provision of any porta cabins on the site.
- The erection and maintenance of security hoarding.
- Periods when plant and materials trips should not be made to and from the site (mainly peak hours but the developer to identify times when trips of this nature should not be made).
- Routes to be used by vehicles carrying plant and materials to and from the site.
- Measures to ensure that construction and delivery vehicles do not impede access to adjoining properties.
- Wheel wash facilities.
- Measures to control noise, dust and vibration.

The duly approved CMS shall be adhered to throughout the construction period.

Reason: In order to ensure that appropriate measures are put in place to limit noise, nuisance and disturbance to the occupiers of neighbouring dwellings during the construction of the development, in accordance with Policy HL2 and EP27 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 10 Prior to first occupancy of the development hereby approved, the private car parking and manoeuvring areas must be marked out in accordance with the approved plan, and permanently maintained thereafter.

Reasons: In the interests of highway safety, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 11 The pedestrian link to the adjacent site to the west, as detailed on the Site Plan drawing number 09992-P1-103 revision B, shall be provided prior to first occupation of the development hereby approved and retained thereafter, unless otherwise agreed in writing by the Planning Authority.

Reason: To ensure satisfactory pedestrian access arrangements, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 12 The 10 resident parking spaces opposing 7 to 15 Wharf Street (odds only), as detailed on the Site Plan drawing number 09992-P1-103 revision B, shall be provided prior to occupation of the development hereby approved and retained thereafter. Signage requiring use of these spaces for the sole use by residents of Wharf Street shall also be erected prior to occupation of the development hereby approved and retained thereafter.

Reason: To ensure satisfactory parking arrangements for residents adjacent to the site, and, access arrangements, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 13 Prior to commencement of the development hereby approved, a scheme of boundary treatment shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to occupation of the development and retained thereafter.

Reason: In the interests of visual amenity, in accordance with Policy HL2 and HL6 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 14 Notwithstanding any details shown on the approved plans, prior to commencement of the development hereby approved, a hard and soft landscaping scheme for the site shall be submitted to and approved in writing by the Local Planning Authority. The soft landscaping scheme shall ensure retention of all trees and hedgerows identified on the Tree Retention Plan drawing number 7795-A-03 (Arboricultural Assessment, FPCR, August 2017), as well as the type, species, siting, planting distances and the programme of planting of trees, hedges and shrubs for additional landscaping within the development.

The development shall be implemented in accordance with the agreed hard landscaping scheme. The agreed soft landscaping scheme shall be carried out during the first planting season after the development is substantially completed and the areas which are landscaped shall be retained as

landscaped areas thereafter. Any trees, hedges or shrubs removed, dying, being severely damaged or becoming seriously diseased within five years of planting shall be replaced by trees, hedges or shrubs of similar size and species to those originally required to be planted.

Reason: To ensure appropriate landscaping of the site in the interests of visual amenity, to enhance the character of the street scene and to provide biodiversity enhancements, in accordance with Policy HL2, EP14 and EP18 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 15 There shall be no lopping, topping or felling of any trees or hedgerow on or overhanging the site unless details have first been submitted to and approved in writing by the Local Planning Authority.

Reason: In order to protect the existing trees on the site and to ensure satisfactory landscaping of the site in the interests of visual amenity, in accordance with Policy EP12 and EP14 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 16 No clearance of trees and shrubs in preparation for or during the course of development shall take place during the bird nesting season (March to July inclusive) unless an ecological survey has first been submitted to and approved in writing by the Local Planning Authority which demonstrates that the vegetation to be cleared is not utilised for bird nesting. Should the survey reveal the presence of any nesting species, then no clearance of trees and shrubs shall take place until a methodology for protecting nest sites during the course of the development has been submitted to and approved in writing by the Local Planning Authority. Nest site protection shall thereafter be provided in accordance with the duly approved methodology.

Reason: In order to prevent any habitat disturbance to nesting birds in accordance with Fylde Borough Local Plan policy EP19, the provisions of the Wildlife and Countryside Act 1981 (as amended), in accordance with Policy EP19 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 17 During construction of the development works on site shall be restricted to between the hours of:

08:00 - 18:00 Monday to Friday.

09:00 - 13:00 Saturday.

No on site works on Sundays or Bank Holidays.

Reason: To safeguard the amenity of neighbouring residents, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 18 Prior to commencement of the development hereby approved, a scheme for provision of bat and bird boxes within the development shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented prior to occupation of the development and retained thereafter.

Reason: To enhance the biodiversity value of the site, in accordance with Policy EP19 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 19 Prior to commencement of the development hereby approved, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions, shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either

directly or indirectly. The development shall be completed in accordance with the approved details.

Those details shall include, as a minimum:

1. Information about the lifetime of the development, design storm period and intensity (1 in 30 & 1 in 100 year +30% allowance for climate change), discharge rates and volumes (both pre and post development), temporary storage facilities, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses, and details of floor levels in AOD.
2. The drainage strategy should demonstrate that the surface water run-off must not exceed the pre-development greenfield runoff rate.
3. Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant).
4. Flood water exceedance routes, both on and off site.
5. A timetable for implementation, including phasing as applicable.
6. Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates.
7. Details of water quality controls, where applicable.

The scheme shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings, or completion of the development, whichever is the sooner. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

Reason: To ensure that the development is not at risk of flooding and does not increase flood risk elsewhere, and that adequate measures are put in place for the disposal of foul and surface water, in accordance with Policies EP25 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

20 None of the dwellings hereby approved shall be first occupied until details of a management and maintenance scheme for the surface water drainage system to be installed has been submitted to and approved in writing by the Local Planning Authority. The scheme shall cover the full lifetime of the drainage system and, as a minimum, shall include:

1. Arrangements for adoption by an appropriate public body or statutory undertaker, or management and maintenance by a Residents Management Company.
2. Arrangements concerning funding mechanisms for the ongoing maintenance of all elements of any sustainable drainage system (including mechanical components) to include details such as:
 - On-going inspections relating to performance and asset condition assessments;
 - Operation costs for regular maintenance, remedial works and irregular maintenance of limited life assets; and
 - Any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.
3. Means of access and easements for maintenance purposes;
4. A timetable for implementation.

The drainage system shall thereafter be installed in accordance with the details and timetable contained within the approved scheme, and shall be managed and maintained as such thereafter.

Reason: To ensure that satisfactory measures are put in place for the management and maintenance of any surface water drainage system throughout the lifetime of the development, to minimise the risk of flooding and to limit the potential for surcharging of the sewer network, in accordance with Policies EP25 and EP30 of the adopted Fylde Borough Council Local Plan as altered (October 2005) and the National Planning Policy Framework.

21 No development shall take place until an investigation and risk assessment has been submitted to and approved in writing by the Local Planning Authority to assess the nature and extent of any contamination on the site (whether or not it originates on the site). The assessment must be

undertaken by competent persons and a written report of the findings submitted to and approved in writing by the Local Planning Authority before any development takes place. The submitted report shall include:

- (i) a survey of the extent, scale and nature of contamination
- (ii) an assessment of the potential risks to:
 - human health;
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland, and service lines and pipes;
 - adjoining land;
 - groundwaters and surface waters;
 - ecological systems;
 - archaeological sites and ancient monuments.
- (iii) where unacceptable risks are identified, an appraisal of remedial options and proposal for the preferred option(s) to form a remediation strategy for the site.

The development shall thereafter be carried out in full accordance with the duly approved remediation strategy and a verification report submitted to and approved in writing by the Local Planning Authority before the development is first occupied.

Reason: To prevent pollution of the water environment and to ensure the safe development of the site in the interests of the amenity of future occupiers, in accordance with Policy EP29 of the adopted Fylde Borough Local Plan (October 2005).

- 22 Once the development is operational, deliveries to or from the site, and, refuse collection from the site shall only take place between the hours of 07:00 - 21:00 Monday to Sunday.

Reason: To safeguard the amenity of neighbouring residents, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 23 Obscure glazing to a minimum Pilkington Level 3 shall be inserted to windows in the eastern elevation of the building hereby approved, as detailed on drawing number 09992-P1-131 revision B. These windows shall be top hung only.

Any replacement glazing or window shall be of identical obscurity and top hung.

Reason: To safeguard the amenity of neighbouring residents, in accordance with Policy HL2 of the adopted Fylde Borough Local Plan (October 2005) and the National Planning Policy Framework.

- 24 The restaurant, hair salon and Spa uses shall remain ancillary to the specialist elderly accommodation hereby approved and shall only be available for use by those working at the premises, occupants of the development and their visitors.

Reason: In order to avoid conflict with town centre retail policies and substandard car parking provision on the site to cater for any general use by the public, in accordance with Policies HL2 and SH15 of the adopted Fylde Borough Council Local Plan (October 2015).

SUMMARY OF RELEVANT POLICIES & GUIDANCE

This decision has been made having regard to the guidance provided by the National Planning Policy Framework and the policies contained within the adopted Development Plan which comprises the saved policies of: the Fylde Borough Local Plan and all other relevant planning guidance and in particular policies:

Fylde Borough Local Plan:

- EP01 Environmental Improvement Schemes
- EP10 Protection of important landscape and habitat features

EP11	Building design & landscape character
EP13	Planting of trees, hedgerows and woodland
EP14	Landscaping of new developments
EP19	Protected species
EP23	Pollution of surface water
EP24	Pollution of ground water
EP30	Development within floodplains
HL02	Development control criteria for new housing proposals
HL06	Design of residential estates
TR09	Car parking within new developments
TREC17	Public Open Space within New Housing Developments

Fylde Local Plan to 2032:

DLF1	Development Locations for Fylde
ENV2	Biodiversity
ENV4	Provision of New Open Space
GD7	Achieving Good Design in Development
H2	Density and Mix of New Residential Development
H4	Affordable Housing
HW1	Health and Wellbeing
INF1	Service Accessibility and Infrastructure
INF2	Developer Contributions
S1	Proposed Settlement Hierarchy
SL1	Lytham and St Annes Strategic Location for Development
SL5	Development Sites outside Strategic Locations for Devt

Informative notes:

1. The Local Planning Authority (LPA), in reaching this decision, has followed the guidance in paragraphs 186 and 187 of the National Planning Policy Framework. The Framework advises that the LPA should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area. This has been demonstrated by:
 1. Actively engaging in pre-application discussions with the applicant to try and find solutions to problems.
 2. Providing advice to the applicant/agent during the course of the application on potential problems and possible solutions.
 3. Securing revised plans during the course of the application which have overcome initial problems.

Date of Decision: 05/03/2018

Signed:



Mr P. Walker
Director of Development Services
Fylde Borough Council
Town Hall
Lytham St Annes, FY8 1LW

Mr Green
Gladman Care Homes Ltd
Gladman House
Alexandria Way
Congleton Business Park
Congleton
CW12 1LB

**IMPORTANT – PLEASE CAREFULLY READ THE NOTES BELOW AS FAILURE TO COMPLY COULD
MAKE THE DEVELOPMENT UNAUTHORISED**

- 1) These notes should be read in conjunction with the decision notice issued by the Local Planning Authority in respect of the application which you have recently submitted to the Council.

IN CASES WHERE PERMISSION/CONSENT HAS BEEN GRANTED

- 2) Any permission/consent is granted on the basis of the approved plans listed in the decision notice. The development should be undertaken in strict accordance with the approved plans, as any deviation will constitute unauthorised development which may be liable to enforcement action. Any amendments to the approved plans are likely to require the submission of a further application to the Council. Should such changes be desired, you are advised to contact the Development Management Service to determine the most appropriate means by which any revisions could be considered.
- 3) Any permission/consent granted is subject to the conditions set out in the decision notice and it is the responsibility of the developer to ensure that these conditions are fully complied with. Any conditions that require work to be carried out or details to be approved before any development can take place form a “condition precedent”. If a condition precedent is not complied with, the whole of the development will be unauthorised and may result in enforcement action being taken by the Council.
- 4) The applicant is reminded of the need to obtain formal approval of those details required by the conditions of any planning permission/consent before development may lawfully commence on the site (or any other relevant trigger as set out in each condition). Formal applications for the approval of matters reserved by condition are currently subject to fees (per request) of £34 for householder applications and £116 in all other cases. Any breach of the imposed conditions may leave you liable to enforcement action or may require you to submit a new application in order to regularise any unauthorised works.
- 5) If the applicant is aggrieved by any of the conditions imposed as part of the planning permission, they may appeal to the Planning Inspectorate. Any appeal against the grant of permission subject to conditions to which the applicant objects needs to be made within 6 months of the date on the decision notice.
- 6) In undertaking any development you should ensure that you have also secured any necessary approval under the Building Regulations or any other approvals or consents required including consent from the landlord or obligations under the Party Wall Act.
- 7) For developments that need a new address or address change, please contact addresses@fylde.gov.uk or 01253 658515. New addresses need to be made as early as possible to arrange for Utility connections.

IN CASES WHERE PERMISSION/CONSENT HAS BEEN REFUSED

8) If the applicant is aggrieved by the decision of the Local Planning Authority to refuse planning permission/consent, they may appeal to the Planning Inspectorate. The relevant time limits to lodge an appeal following the Local Planning Authority's refusal of permission/consent are as follows:

- a) For **householder** planning applications – **12 weeks** from the date on the decision notice.
- b) For **advertisement** consent applications – **8 weeks** from the date on the decision notice.
- c) For **minor commercial** development applications – **12 weeks** from the date on the decision notice.
- d) For **any other** types of planning application – **6 months** from the date on the decision notice.

SAVE THAT in circumstances **where an enforcement notice has been served** for the same or very similar development, the time limit to lodge an appeal (in all cases) is:

- within **28 days** from the date of the Local Planning Authority's decision if the enforcement notice was served before the decision was made, yet not longer than 2 years before the application was made.
- within **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the normal appeal period).

Appeals must be made directly to the Planning Inspectorate and can be dealt with by exchange of written statements or heard before an Inspector at an Informal Hearing or at a Public Inquiry. Further information regarding the appeals process (including application forms) can be obtained from the Planning Inspectorate via their website - <https://www.gov.uk/planning-inspectorate>.

HLS4



Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

Full Planning Permission Approved with 106 Agreement

Part 1 - Particulars of Application

Application Number: 16/0061

Location: LAND AT ROSEACRE, WILDINGS LANE, LYTHAMST ANNES, FY8 3RJ

Description: ERECTION OF 45 DWELLING HOUSES AND ASSOCIATED PUBLIC OPEN SPACE, AND ENHANCEMENT TO WILDINGS LANE, FOLLOWING DEMOLITION AND REMOVAL OF EXISTING DWELLING, STABLES, MENAGE AND PADDOCKS.

Part 2 - Particulars of Decision

The Fylde Borough Council hereby give notice in pursuance of the provisions of the Town and Country Planning Act 1990 that **PERMISSION HAS BEEN GRANTED SUBJECT TO A 106 AGREEMENT** for the carrying out of development referred to in Part 1 hereof in accordance with the development proposal specified on your submitted application form and the relevant plan (s) subject to the following conditions(s) and reasons(s):

- 1 The development must be begun not later than the expiration of three years beginning with the date of this permission.

Reason: To comply with the requirements of section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2 This consent relates to the following details:

Approved plans:

Site Location Plan
Revised Access Plan – J614 –Access-flg1
Proposed Site Plan – A2A.15.702_202 Revision E
Proposed strip elevations – A2A.15.702_303 Revision D
Proposed strip elevations – A2A.15.702_302 Revision D
Proposed strip elevations – A2A.15.702_301 Revision D
House types – A2A.15.702_101
A2A.15.702_102
A2A.15.702_103
A2A.15.702_104
A2A.15.702_105
A2A.15.702_106

A2A.15.702_107
A2A.15.702_108
A2A.15.702_109
A2A.15.702_1010
A2A.15.702_1011

Reason: For the avoidance of doubt and as agreed with the applicant / agent.

- 3 Notwithstanding any denotation on the approved plans samples of the roof treatment and wall cladding [both inclusive of colour] shall be submitted to and approved by the Local Planning Authority no later than 21 days prior to the commencement of any built development works on site. Thereafter only those approved materials shall be used in the development unless otherwise agreed in writing with the Authority.

Such details are not shown on the application and must be agreed to ensure a satisfactory standard of development.

- 4 Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance with evidence of an assessment of the site conditions shall be submitted to and approved in writing by the Local Planning Authority. The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly. The development shall be completed in accordance with the approved details.

Those details shall include, as a minimum:

- a. Information about the lifetime of the development, design storm period and intensity (1 in 30 & 1 in 100 year +30% allowance for climate change), discharge rates and volumes (both pre and post development), temporary storage facilities, the methods employed to delay and control surface water discharged from the site, and the measures taken to prevent flooding and pollution of the receiving groundwater and/or surface waters, including watercourses, and details of floor levels in AOD;
- b. The drainage strategy should demonstrate that the surface water run-off must not exceed the pre-development greenfield runoff rate.
- c. Any works required off-site to ensure adequate discharge of surface water without causing flooding or pollution (which should include refurbishment of existing culverts and headwalls or removal of unused culverts where relevant);
- d. Flood water exceedance routes, both on and off site;
- e. A timetable for implementation, including phasing as applicable;
- f. Evidence of an assessment of the site conditions to include site investigation and test results to confirm infiltrations rates;
- g. Details of water quality controls, where applicable.

The scheme shall be implemented in accordance with the approved details prior to first occupation of any of the approved dwellings, or completion of the development, whichever is the sooner. Thereafter the drainage system shall be retained, managed and maintained in accordance with the approved details.

Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.

- 5 Prior to the commencement of the development a sustainable drainage management and maintenance plan for the lifetime of the development shall be submitted to the Local Planning authority and agreed in writing. The sustainable drainage management and maintenance plan shall include as a minimum:
- a. The arrangements for adoption by an appropriate public body or statutory undertaker, or, management and maintenance by a Resident's Management Company; and
 - b. Arrangements concerning appropriate funding mechanisms for its ongoing maintenance of all elements of the sustainable drainage system (including mechanical components) and will include elements such as ongoing inspections relating to performance and asset condition assessments, operation costs, regular maintenance, remedial works and irregular maintenance caused by less sustainable limited life assets or any other arrangements to secure the operation of the surface water drainage scheme throughout its lifetime.

The development shall subsequently be completed, maintained and managed in accordance with the approved plan.

Reason: To manage flooding and pollution and to ensure that a managing body is in place for the sustainable drainage system and there is funding and maintenance mechanism for the lifetime of the development

- 6 No development shall commence until details of the finished floor levels have been submitted to, and approved in writing by, the local planning authority. The development shall be constructed in accordance with the approved details.

Reason: For the avoidance of doubt, to comply with the requirements of the flood risk assessment Wilding's Lane, Lytham St Anne's by Atmos Consulting, December 2015, and to ensure a satisfactory standard of development.

- 7 No part of the development hereby approved shall commence until a scheme for the construction all site access and the off-site works of highway improvement have been submitted to, and approved by the Local Planning Authority in consultation with the Highway Authority. The site accesses and off-site highway works shall be completed before the development is first occupied unless otherwise agreed in writing by the Local Planning Authority. The following schemes to be covered by this condition include:

- The Main Site access junction off Wildings Lane and associated improvement works on Wildings Lane as agreed 'in principle' subject to detailed design and shown in revised site access plan (Drawing No. J614_Access-fig1, dated 13/07/2016),
- Introduction of MOVA at St Annes Road East signalised junction with St David Road; and
- Introduction of MOVA at St Annes Road East and Church Road

The scheme shall include a phasing plan for these works and shall be implemented in accordance with this agreed phasing.

(Note: Delivering these s278 works may require a review, consultation and implementation of new/or changes to TROs; the full cost for these to be funded by the developer.)

Reason: In order to satisfy the Local Planning Authority and the Highway Authority that the final details of the highway scheme/works are acceptable before work commences on site. Also, in order to provide safe access to the site for all users (motorised and non-motorised).

- 8 The Framework Travel Plan as agreed must be implemented in full in accordance with the timetable within it unless otherwise agreed in writing with the Local Planning Authority. All elements shall continue to be implemented at all times thereafter for as long as any part of the development is occupied or used/for a minimum of at least 5 years.

Reason: To ensure that the development provides sustainable transport options.

- 9 No development of any phase shall take place until a Construction Environmental Management Plan (CEMP), for the construction and operation of that proposed phase of development, is submitted to and approved by the Local Planning Authority. The plan shall detail:
- a. how biodiversity would be protected throughout the construction period
 - b. the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters
 - c. the parking of vehicles of site operatives and visitors;
 - d. loading and unloading of plant and materials;
 - e. storage of plant and materials used in constructing the development;
 - f. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - g. wheel washing facilities to be retained throughout the construction period by which means the wheels of vehicles may be cleaned before leaving the site;
 - h. a scheme for recycling/disposing of waste resulting from construction work (there shall be no burning on site);
 - i. a Management Plan to identify potential ground and water contaminants;
 - j. details for their storage and how water courses will be protected against spillage incidents and pollution during the course of construction;
 - k. a scheme to control noise during the construction phase,
 - l. the routing of construction vehicles and deliveries to site including the direction of construction traffic

The development shall then proceed in full accordance with this approved plan.

Reason: In order to safeguard the biodiversity of the site, protect the water environment and public drinking water supplies, and to maintain the operation and safety of the local highway network, and to minimise the risk of pollution to occupiers of nearby buildings during site preparation and construction, in accordance with the provisions of the NPPF.

- 10 There shall not at any time in connection with the development hereby permitted be planted hedges, trees or shrubs within any visibility splay required to maintain safe operation for all users.

Reason: To ensure adequate visibility splays are maintained at all time.

- 11 Prior to the commencement of works there shall be a further precautionary inspection/survey of ditches to inform any change in the habitat quality for and use by water voles. The report of the survey (together with proposals for mitigation/compensation, if required) shall be submitted to Fylde Borough Council for approval in consultation with specialist advisors. Any necessary and approved measures for the protection of Water Vole will be implemented in full.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 12 No tree felling, vegetation clearance works, demolition work or other works that may affect nesting birds shall take place between 1st March and 31st August inclusive, unless surveys by a competent ecologist show that nesting birds would not be affected.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 13 The precautions for avoidance of possible harm to bats as detailed in section 7.2.2 of the 'Atmos'

ecological survey report dated October 2015 shall be implemented in full throughout construction of the development.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 14 All existing lengths of hedgerow within the proposed residential development area shall be retained, except for where their removal is required for the formation of access points or visibility splays or in other limited circumstances where an equivalent or greater length of hedge is provided as a replacement and has been previously agreed in writing by the Local Planning Authority. No removal, relaying or works to existing hedgerows shall be carried out between March and August inclusive in any one year unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 15 Prior to the commencement of development a plan shall be provided to the Local Planning Authority for approval in writing in consultation with Natural England which clearly identified the area in the north east corner of the site where no construction works shall be undertaken between the 28th/29th February and 30th September of any year.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 16 Notwithstanding the approved plans prior to the commencement of development full details of all boundary treatments shall be submitted for approval in writing to the Local Planning Authority. For the avoidance of doubt this shall include details of signage on appropriate boundaries to highlight the importance and sensitivity of the surrounding area and that fences shall be dog proof to prevent dogs accessing adjacent land independently.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 17 Prior to occupation of the dwellings hereby approved full details of a homeowner's pack that will be made available to new and future homeowners, which would highlight and explain the sensitivity of the surrounding areas, the importance of keeping dogs on a lead and identifying other suitable recreational areas locally shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of protecting wildlife and biodiversity and to comply with the provisions of the Wildlife & Countryside Act 1981 and the National Planning Policy Framework.

- 18 Prior to the commencement of development the applicant shall submit a piling method statement in accordance with BS 7385: Part 2 and assessed to BS 5228 part 4 (enables a prediction to be made of the peak particle velocities from piling) for the effects of vibration on Buildings and Structure and also human health for approval in writing to the Local Planning Authority. For the avoidance of doubt the method statement shall include the predictions and any necessary mitigation; proposals for monitoring the vibration during the work program at noise sensitive properties; making local residents aware of times, duration and contact details of anyone on site during the work. This in accordance with the general time restrictions to be imposed on the construction site.

Reason: In the interests of residential amenity.

- 19 Construction phase (noise and vibration) levels shall not exceed 5mm/sec at the nearest sensitive premises as a result. This level is deemed to have a “moderate negative” impact on human health in accordance with BS 6472:19929

Reason: In the interests of residential amenity.

- 20 Notwithstanding the provision of Article 3, Schedule 2, Part 1, Class(es) A, B, C, D, E, F and G of the Town and Country Planning General Permitted Development Order 2015 [or any Order revoking or re-enacting that Order], no further development of the dwelling[s] or curtilage(s) relevant to those classes shall be carried out without Planning Permission.

To ensure that the Local Planning Authority has control over any future development of the dwelling[s] which may adversely affect the character and appearance of the dwelling[s] and the surrounding area.

- 21 No development shall take place until full details of scheme indicating areas of public open space and / or children's play areas have been submitted to and approved by the Local Planning Authority. Such a scheme should make provisions in accordance the Council's adopted policy on public open space in terms of layout and requirements.

To ensure adequate on site play space.

- 22 Prior to the commencement of the development, the developer must contact the Safeguarding Team, Blackpool Airport, Squires Gate Lane, Blackpool, FY4 2QY (Tel: 01253 472527 or by email to safeguarding@blackpoolairport.com) if any equipment to be used during construction will exceed the maximum height of the finished development (eg tower cranes, piling rigs). Notification of the equipment shall be made in writing and include:
- its position (OSGB grid coordinates to 6 figures each of Eastings and Northings);
 - height above ordnance datum;
 - anticipated dates on site;
 - emergency contact numbers for the crane operator and site manager

Reason: In the interests of aviation safety.

- 23 Prior to the commencement of development on the site a scheme shall be submitted to the Local Planning Authority for approval in writing that includes full details of the following mitigation actions specified in the ATMOS Bird Hazard Risk Assessment;
- The process for the attendance of Bird Control at the site, when triggered by the presence of birds at levels described in the ATMOS Assessment and details of the provisions for this.
 - The process for site surveys as detailed in the mitigation actions specified in the Bird Hazard Risk Assessment and provide the results of said surveys to the Local Planning Authority for review in consultation with Blackpool Airport.
 - Full details of the Homeowners Pack and the signage around the development site.
 - Full details of the proposed landscaping.

The proposed development and mitigation shall thereafter be carried out in accordance with the approved details.

Reason: In the interests of aviation safety.

SUMMARY OF RELEVANT POLICIES & GUIDANCE

This decision has been made having regard to the guidance provided by the National Planning Policy Framework and the policies contained within the adopted Development Plan which comprises the saved policies of: the Fylde Borough Local Plan and all other relevant planning guidance and in particular policies:

Fylde Borough Local Plan:

- EP11 Building design & landscape character
- EP14 Landscaping of new developments
- EP19 Protected species
- EP22 Protection of agricultural land
- EP23 Pollution of surface water
- EP24 Pollution of ground water
- EP25 Development and waste water
- HL02 Development control criteria for new housing proposals
- SP02 Development in countryside areas
- TREC17 Public Open Space within New Housing Developments

Fylde Local Plan to 2032:

Informative notes:

1. The Local Planning Authority (LPA), in reaching this decision, has followed the guidance in paragraphs 186 and 187 of the National Planning Policy Framework. The Framework advises that the LPA should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area
2. The grant of planning permission will require the applicant to enter into an appropriate Legal Agreement with the County Council as Highway Authority. The Highway Authority hereby reserves the right to provide the highway works within the highway associated with this proposal. Provision of the highway works includes design, procurement of the work by contract and supervision of the works. The applicant should be advised to contact the Lancashire County Council, Highways in the first instance, to ascertain the details of such an agreement and the information to be provided.
3. The grant of planning permission does not entitle a developer to obstruct a right of way and any proposed stopping-up or diversion of a right of way should be the subject of an Order under the appropriate Act.
4. Traffic Regulation Orders, diversions of Public Rights of Way, Stopping Up of existing highway, changes to public transport scheduling/routing and other activities require separate statutory consultation processes beyond the planning application process. The applicant will be obliged to meet all the costs associated with these of works and ensure that any works which rely upon them do not commence until all legal processes have been satisfactorily completed.

Signed:



Mr P. Walker
Director of Development Services
Fylde Borough Council
Town Hall
Lytham St Annes, FY8 1LW

Mr Gee
Roman Summer Associates Ltd
LIME LEACH STUDIO
363 - 367 ROCHDALE ROAD
TURN VILLAGE
RAMSBOTTOM, BURY, Lancashire
BL0 0RL

**IMPORTANT – PLEASE CAREFULLY READ THE NOTES BELOW AS FAILURE TO COMPLY COULD
MAKE THE DEVELOPMENT UNAUTHORISED**

- 1) These notes should be read in conjunction with the decision notice issued by the Local Planning Authority in respect of the application which you have recently submitted to the Council.

IN CASES WHERE PERMISSION/CONSENT HAS BEEN GRANTED

- 2) Any permission/consent is granted on the basis of the approved plans listed in the decision notice. The development should be undertaken in strict accordance with the approved plans, as any deviation will constitute unauthorised development which may be liable to enforcement action. Any amendments to the approved plans are likely to require the submission of a further application to the Council. Should such changes be desired, you are advised to contact the Development Management Service to determine the most appropriate means by which any revisions could be considered.
- 3) Any permission/consent granted is subject to the conditions set out in the decision notice and it is the responsibility of the developer to ensure that these conditions are fully complied with. Any conditions that require work to be carried out or details to be approved before any development can take place form a “condition precedent”. If a condition precedent is not complied with, the whole of the development will be unauthorised and may result in enforcement action being taken by the Council.
- 4) The applicant is reminded of the need to obtain formal approval of those details required by the conditions of any planning permission/consent before development may lawfully commence on the site (or any other relevant trigger as set out in each condition). Formal applications for the approval of matters reserved by condition are currently subject to fees (per request) of £28 for householder applications and £97 in all other cases. Any breach of the imposed conditions may leave you liable to enforcement action or may require you to submit a new application in order to regularise any unauthorised works.
- 5) If the applicant is aggrieved by any of the conditions imposed as part of the planning permission, they may appeal to the Planning Inspectorate. Any appeal against the grant of permission subject to conditions to which the applicant objects needs to be made within 6 months of the date on the decision notice.
- 6) In undertaking any development you should ensure that you have also secured any necessary approval under the Building Regulations or any other approvals or consents required including consent from the landlord or obligations under the Party Wall Act.
- 7) For developments that need a new address or address change, please contact addresses@fylde.gov.uk or 01253 658515. New addresses need to be made as early as possible to arrange for Utility connections.

IN CASES WHERE PERMISSION/CONSENT HAS BEEN REFUSED

- 8) If the applicant is aggrieved by the decision of the Local Planning Authority to refuse planning permission/consent, they may appeal to the Planning Inspectorate. The relevant time limits to lodge an appeal following the Local Planning Authority's refusal of permission/consent are as follows:
- a) For **householder** planning applications – **12 weeks** from the date on the decision notice.
 - b) For **advertisement** consent applications – **8 weeks** from the date on the decision notice.
 - c) For **minor commercial** development applications – **12 weeks** from the date on the decision notice.
 - d) For **any other** types of planning application – **6 months** from the date on the decision notice.

SAVE THAT in circumstances **where an enforcement notice has been served** for the same or very similar development, the time limit to lodge an appeal (in all cases) is:

- within **28 days** from the date of the Local Planning Authority's decision if the enforcement notice was served before the decision was made, yet not longer than 2 years before the application was made.
- within **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the normal appeal period).

Appeals must be made directly to the Planning Inspectorate and can be dealt with by exchange of written statements or heard before an Inspector at an Informal Hearing or at a Public Inquiry. Further information regarding the appeals process (including application forms) can be obtained from the Planning Inspectorate via their website - <https://www.gov.uk/planning-inspectorate>.

HLS5

Stephen Harris

From: Alexis De Pol <alexis@depol.co.uk>
Sent: 21 January 2020 19:42
To: Andrew Stell
Cc: Nathan Tonge
Subject: FW: Hole in one - 19/0640

Hi Andrew

Nathan has copied me into your email below, where you refer to having not instructed the Council's valuers as you are waiting for a response to an email back in December. Your December email raises two points on affordable housing (AH).

1. It refers to NPPF para 64 and a need for 10% provision in all cases. You will recall we had a telephone discussion on this matter prior to Committee, where I highlighted that we fundamentally disagree with your interpretation of the NPPF in this regard. I also see no reason why this matter needs to be resolved prior to your instruction of a valuer to consider the submitted viability case. Nevertheless, I reiterate our interpretation of NPPF 64 later in this email.
2. It raises a query over the calculation of the scale of the proposed building in relation to Vacant Building Credit (VBC). Again, this is a separate issue to considering the viability evidence although I address your comments below.

At no time previously have you suggested that the above issues need resolving before you can instruct the valuer. When we spoke prior to Committee you confirmed that the reason you were not instructing the valuer was that you wanted to wait until the Committee had confirmed they were ok with the principle of development, which has been confirmed. VBC and NPPF para 64 are issues for consideration once we have fully explored viability and in this regard they may even prove academic. Nevertheless I address your comments below.

NPPF 64

The glossary at Annex 2 defines affordable housing as housing for sale or rent, before providing more detailed definitions. These run from definition a) which is affordable housing for rent, through to definition d) which is other affordable routes to home ownership. This is relevant as paragraph 64 states "*Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership²⁹, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.*" It is clear therefore that paragraph 64 is specifically referring to affordable home ownership and not affordable housing generally. It is also relevant that the sentence has to be read alongside footnote 29, which states "*As part of the overall affordable housing contribution from the site*".

The 10% reference therefore means 10% of the overall affordable housing contribution has to be in the form of affordable ownership products. This is part of the Government drive to boost the provision of affordable housing products aimed at 'affordable home ownership' rather than affordable housing contributions being restricted to 100% affordable rental products. What the paragraph is not saying is that at least 10% of housing schemes must comprise affordable housing irrespective of vacant building credit or viability cases. If this were intended to be the case paragraph 64 would have been more specific and there would also be corresponding text elsewhere in the NPPF and PPG, where reference is made to vacant building credit and viability.

I am happy to discuss this matter further, but as stated it is first relevant to have your feedback on the viability evidence submitted and it certainly doesn't need to be resolved prior to your valuers being instructed.

VBC

I have double checked the position and I agree that there is an error in the calculation as the floor space of the proposed apartments is higher than stated. It is however only the VBC calculation which is wrong in this regard, as you will note that the submitted proposed floor plans identify the individual floor areas for each apartment and that when added together this reflects the floor area in your email. The submitted viability statement by LWP is also based on the submitted plans, which are correct, not the figure in the VBC calculation which is incorrect. As highlighted, the VBC case is also a matter than isn't really relevant until the viability case has been considered and is likely to prove academic in any event.

I trust you will therefore proceed with instructing a valuer, or at least obtaining confirmation on fees, ASAP so that we can progress this matter.

Kind regards

Alexis

Alexis De Pol
BA(Hons) DipTP MRTPI
Managing Director

T. 01772 888488
E. alexis@depol.co.uk
www.depol.co.uk



De Pol Associates Limited - Farington House, Stanifield Business Park, Stanifield Lane, Farington, Leyland, Preston, PR25 4UA



From: Andrew Stell <andrew.stell@fylde.gov.uk>
Sent: 14 January 2020 20:55
To: Nathan Tonge <Nathan@depol.co.uk>
Subject: RE: Hole in one - 19/0640

Nathan

Thanks for that plan which I have added to the file and sent to LCC highways for their view. I have also chased LCC for their views on the bus subsidy which was requested by Committee as that has implications for the viability as it is one of the contributions that the development would be expected to provide.

With regards to the viability I have not yet progressed this as I am also awaiting a response to my email of 8 December which raises some queries over the calculations of the scale of the building used in the submission and so have implications for the extent of VBC that can be applied. As this also affects the viability I need to have clarity on this to enable a clear instruction to be given to the council's valuers on this.

I will also need an assurance that your client will meet the costs of that valuation before placing the instruction so I will contact them to gather that and then be in touch when I have the information.

Regards

Andrew

From: Nathan Tonge <Nathan@depol.co.uk>
Sent: 13 January 2020 11:47
To: Andrew Stell <andrew.stell@fylde.gov.uk>
Subject: Hole in one - 19/0640

Hi Andrew,

Please see attached an amended version of the layout relating to the above application, which takes into account LCC Highways comments as set out below:

- Inclusion of a 2m wide footpath on the eastern side of the western access, up to the first parking bay.
- Swept path analysis for the proposed eastern access for a rear twin axel refuse vehicle (11.2m long), entering and existing the site access with a car in the opposite lane and not crossing the centre line of Forest Drive.
- Extended footpath to the west of the eastern access to a minimum of 2m around the radius.
- Swept path analysis for a twin axel refuse vehicle (11.2m long) for the turning head area or provide a prescribes "Access Way" turning head from the LCC residential design guide

In respect of comments regarding the need need to relocate the refuse collection point at the eastern access – the attached shows the optimal location for a refuse vehicle to stop with the ability to cars to pass safely.

We would be grateful if you could confirm whether the amended layout is acceptable.

We are now keen to progress with this application and we would appreciate an update regarding viability matters.

Kind regards,

Nathan Tonge
BA(Hons) MSc
Assistant Planner

T. 01772 888488
E. nathan@depol.co.uk
www.depol.co.uk



De Pol Associates Limited - Farington House, Stanifield Business Park, Stanifield Lane, Farington, Leyland, Preston, PR25 4UA



Andrew Stell

Development Manager

t: 01253 658473

e: andrew.stell@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

Email Disclaimer



HLS6



Town and Country Planning Act 1990

Town and Country Planning (Development Management Procedure) (England) Order 2015

Outline Planning Permission Granted with Section 106

Part 1 - Particulars of Application

Application Number: 15/0114

Location: LAND ON THE NORTH & SOUTH SIDE OF OLD HOUSE LANE, WESTBY WITH PLUMPTONS

Description: **OUTLINE APPLICATION FOR MIXED USE DEVELOPMENT OF UP TO 265 DWELLINGS AND 1.5 HECTARES OF EMPLOYMENT DEVELOPMENT (CLASS B1A/B1B/B1C/B2/B8) WITH ACCESS FROM WESTBY CLOSE AND WITH EMERGENCY ACCESS FROM WESTBY CLOSE AND FROM THE WEST VIA LEA GREEN DRIVE AS REQUIRED. ALL MATTERS OTHER THAN ACCESS TO BE RESERVED**

Part 2 - Particulars of Decision

The Fylde Borough Council hereby give notice in pursuance of the provisions of the Town and Country Planning Act 1990 that PERMISSION HAS BEEN GRANTED for the carrying out of the development referred to in Part 1 hereof subject to the following condition(s):

1. A subsequent application for the approval of reserved matters must be made not later than the expiration of three years beginning with the date of this permission and the development must be begun not later than whichever is the later of the following dates:
 - [a] The expiration of five years from the date of this permission;
 - or
 - [b] The expiration of two years from the final approval of the reserved matters, or in the case of approval on different dates, the final approval of the last such matter approved.

Required to be imposed pursuant to Section 92 of the Town and Country Planning Act 1990.

2. Before any development is commenced (a) reserved matters application(s) must be submitted to and approved by the Local Planning Authority in respect of the following reserved matters:

Nos. (1,2,3 & 5)

- (Reserved matters are:-
1. Layout
 2. Scale
 3. Appearance
 4. Access
 5. Landscaping

This permission is an outline planning permission and details of these matters still remain to be submitted.

3. Prior to the commencement of any of the residential development hereby approved, a scheme shall be submitted to and approved in writing by the Local Planning Authority which shall demonstrate how the infrastructure including the proposed vehicular access shall be delivered. Full details of the proposed pedestrian, emergency accesses and bus gates and how they will be delivered, controlled and maintained shall also be submitted. This scheme shall be implemented to the satisfaction of the Local Planning Authority, prior to the occupation of the first dwelling.

Reason: In order to ensure a satisfactory comprehensive development of the whole site in accordance with Policy M1 of the Local Plan to 2032.

4. Prior to the commencement of any of the employment development hereby approved, a scheme shall be submitted to and approved in writing by the Local Planning Authority which shall demonstrate how the infrastructure including the proposed vehicular access and services to the proposed employment land shall be delivered. Details of any proposed pedestrian, emergency accesses and bus gates and how they will be delivered, controlled and maintained shall also be submitted. This scheme shall be implemented to the satisfaction of the Local Planning Authority, prior to the occupation of the first employment land. .

Reason: In order to ensure a satisfactory comprehensive development of the whole site in accordance with Policy M1 of the Local Plan to 2032

5. A detailed scheme of landscaping for the proposed landscape buffer shall be submitted to and approved in writing by the Local Planning Authority, prior to construction of the residential development hereby approved. The landscaped buffer shall be implemented simultaneously with the residential development to the satisfaction of the Local Planning Authority and maintained in perpetuity.

Reason: To ensure a satisfactory standard of development in accordance with policy GD7 and ENV1 of the Local Plan to 2032.

6. No development shall take place until a plan detailing the protection and/or mitigation of damage to populations of Water Vole, a protected species under The Wildlife and Countryside Act 1981 as amended and their associated habitat during construction works and once the development is complete. Any change to operational, including management, responsibilities shall be submitted to and approved in writing by the local planning authority. The Water Vole protection plan shall be carried out in accordance with a timetable for implementation as approved.

Reason: This condition is necessary to protect the Water Vole population and their habitat within and adjacent to the development site. Without it, avoidable damage could be caused to the nature conservation value of the site in accordance with Policy ENV2 of the Local Plan to 2032.

7. No development shall take place until a landscape creation and management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning

authority.

The scheme shall include the following elements:

- " detail extent and type of new planting (NB planting to be of native species)
- " details of maintenance regimes
- " details of any new habitat created on site
- " details of treatment of site boundaries and/or buffers around water bodies
- " details of management responsibilities

Reason: In order to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site in accordance with Policy ENV1 and ENV2 of the Local Plan to 2032.

8. The reserved matters application shall retain all existing lengths of hedgerow within the proposed residential development area except for where their removal is required for the formation of access points, pavements/cycleways & visibility splays or in other limited circumstances where an equivalent or greater length or hedge is provided as a replacement and has been previously agreed in writing by the Local Planning Authority. No removal, relaying or works to existing hedgerows shall be carried out between March and August inclusive in any one year unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to protect habitats which have the potential to support breeding birds in accordance with Policy ENV2 of the Local Plan to 2032

9. Prior to any development activity commencing, retained trees, either individually or, where appropriate, as groups, will be protected by erecting HERAS fencing at the Root Protection Areas (RPAs) identified in the arboricultural survey.

Within, or at the perimeter of, these root protection areas, all of the following activities are prohibited:

- " Lighting of fires;
- " Storage of site equipment, vehicles, or materials of any kind;
- " The disposal of arisings or any site waste;
- " Any excavation;
- " The washing out of any containers used on site.

HERAS fencing must not be removed or relocated to shorter distances from the tree without the prior agreement of the Local Planning Authority. Any work to retained trees to facilitate development or site activity must (a) be agreed in advance with the Local Planning Authority and (b) must meet the requirements of BS3998:2010 Tree Work - recommendations.

Reason: To ensure that tree root damage and damage to the aerial parts of retained trees is avoided so that the trees' health and visual amenity is not diminished by development activity in accordance with Policy ENV2 of the Local Plan to 2032.

10. The on-site provision of public open space shall be in accordance with the provisions of Policy ENV4 of the Fylde Local Plan to 2032 and shall include facilities for children's play provision in accordance with a scheme of which shall be agreed by the Local Planning Authority and constructed and made available for use in accordance with a timetable for construction which shall be approved in writing by the Local Planning Authority.

Reason: In order to secure the provision of public open space in accordance with Policy ENV4 of the Local Plan 2032

11. No development shall take place in any individual phase of the development hereby approved that exceeds 15m in height above ground level, unless there has been submitted to and approved in writing by the planning authority and by the radar Operator - NATS (En-route) plc, either:
" detailed plans for the proposed buildings in that individual phase, demonstrating that there would be no detrimental impact upon the operation of the St. Annes Radar; or,
" details of a scheme to mitigate any detrimental impact upon the St. Annes Radar.
Development shall not take place other than in complete accordance with such a scheme as so approved unless the planning authority and NATS (En-route) plc have given written consent for a variation.

Reason: To avoid a potential impact on the safety of air traffic due to a technical impact on the NATS RSS St. Annes Secondary Surveillance Radar.

12. No part of the development hereby approved shall commence until a scheme for the construction all site access and the off-site works of highway improvement have been submitted to, and approved by the Local Planning Authority in consultation with the Highway Authority. The site accesses and off-site highway works shall be completed before the development is first occupied unless otherwise agreed in writing by the Local Planning Authority. The following schemes to be covered by this condition include:

(i) The Main Site access junction on Westby Close. The main site access will provide a new standard roundabout or such other provision as approved in writing by the Local Planning Authority. The illustrative masterplan layout (Option 4) shows the approximate location which is agreed 'in principle' subject to detailed design.

The site access junction scheme should also include gateway treatment/traffic calming measures to residential areas.

(ii) Jenny Lane Footpath Improvement Scheme

Pedestrian footway on Jenny Lane (southeast side) from south of Old Houses Lane to tie in to existing footpath at Brunel Way roundabout (to include dropped kerbs and tactile paving over Old Houses Lane) so far as able to do so in adopted highway. This s278 scheme to include clearance of the overgrown vegetation to the existing footway at the junction of Old Houses Lane with Jenny Lane to be carried out within adopted highway and a traffic management scheme/signing scheme to reinforce the nature and limited access to Old Houses Lane.

Note: Delivering these s278 works may require a review, consultation and implementation of new/or changes to TROs; the full cost for these to be funded by the developer.

Reason: In order to satisfy the Local Planning Authority and the Highway Authority that the final details of the highway scheme/works are acceptable before work commences on site. Also, in order to provide safe access to the site for all users (motorised and non-motorised).

13. Prior to the first occupation of any part of the development hereby approved, the access and off-site highway works set out in condition 12 should be constructed in accordance with the details approved, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In order to satisfy the Local Planning Authority and the Highway Authority that the development will provide a safe access to the site and ensure that users of the development have appropriate access to sustainable transport options

14. Prior to the commencement of development a phasing programme for the implementation of the residential development, the construction of the access roads and highway works in their entirety, and the implementation of public open space, landscaping and other associated works shall be submitted to and approved in writing by the local planning authority. The development

shall be carried out in accordance with the approved phasing programme.

Reason: To define the permission and in the interests of the proper site development in accordance with Policy M1 and GD7 of the Local Plan to 2032.

15. The Framework Travel Plan as agreed must be implemented in full in accordance with the timetable within it unless otherwise agreed in writing with the Local Planning Authority. All elements shall continue to be implemented at all times thereafter for as long as any part of the development is occupied or used/for a minimum of at least 5 years.

Reason: To ensure that the development provides sustainable transport options in accordance with Policy T4 of the Local Plan to 2032.

16. No development of any phase shall take place until a Construction Environmental Management Plan (CEMP), for the construction and operation of that proposed phase of development, is submitted to and approved by the Local Planning Authority. The plan shall detail:
- i. how biodiversity would be protected throughout the construction period
 - ii. the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters
 - iii. the parking of vehicles of site operatives and visitors;
 - iv. loading and unloading of plant and materials;
 - v. storage of plant and materials used in constructing the development;
 - vi. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
 - vii. wheel washing facilities to be retained throughout the construction period by which means the wheels of vehicles may be cleaned before leaving the site;
 - viii. a scheme for recycling/disposing of waste resulting from construction work (there shall be no burning on site);
 - ix. a Management Plan to identify potential ground and water contaminants;
 - x. details for their storage and how water courses will be protected against spillage incidents and pollution during the course of construction;
 - xi. a scheme to control noise during the construction phase,
 - xii. the routing of construction vehicles and deliveries to site including the direction of construction traffic away Old Houses Lane.

The development shall then proceed in full accordance with this approved plan.

Reason: In order to safeguard the biodiversity of the site, protect the water environment and public drinking water supplies, and to maintain the operation and safety of the local highway network, and to minimise the risk of pollution to occupiers of nearby buildings during site preparation and construction, in accordance with the provisions of the NPPF and Policy GD7 of the Local Plan to 2032.

17. The development hereby approved shall not be commenced until a details are submitted that set out the proposals for the management and operation of Old Houses Lane and how access for existing properties served of Old Houses Lane will be maintained/facilitated.

Reason: To ensure that a satisfactory Management Strategy is implemented for the maintenance and operation of Old Houses Lane both during construction and post development.

18. There shall not at any time in connection with the development hereby permitted be planted hedges, trees or shrubs over 1m above the road level within any visibility splay required to maintain safe operation for all users.

Reason: To ensure adequate visibility splays are maintained at all time.

19. Prior to the commencement of any of the commercial development hereby approved, a fully detailed Parking Management Strategy for that commercial development shall be submitted to and approved in writing by the Local Planning Authority. The management of the car parking and cycle parking at the site shall be fully implemented in accordance with the approved strategy, unless otherwise agreed in writing by the Local Planning Authority. The Parking Management Strategy will include an assessment and strategy to ensure adequate parking provision is delivered for all proposed site uses for both car parking and cycle parking.

Reason: To ensure that a satisfactory Parking Management Strategy is implemented for the development. This in turn will ensure adequate parking is provided for all uses so that the access to the site is not restricted, resulting in safety and capacity issues.

20. Notwithstanding the approved plans prior to the commencement of development a phasing plan for the completion of the road within the site to be built up to and contiguous with the southern boundary as shown by the red edge on the submitted site location plan and to be connected to the road known as Pankhurst Way, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: So as to not prejudice the future development of the adjacent land in accordance with Policy M1 of the Fylde Local Plan to 2032.

21. The car parking provision for each commercial unit as identified in the Parking Management Strategy for that unit shall be surfaced, demarcated and made available for use prior to the that unit being first occupied unless otherwise agreed in writing with the Local Planning Authority. The car parking shall then be available at all times whilst that part of the development is occupied.

Reason - To ensure that there is adequate parking for the development proposed when the buildings are occupied and the site is built out.

22. No commercial unit shall be occupied until space and facilities for bicycle parking have been provided in accordance with the Parking Management Strategy for that unit. The approved space and facilities shall then be retained and permanently reserved for bicycle parking.

Reason - To ensure that adequate provision is made for bicycle parking so that persons occupying or visiting the development have a range of options in relation to mode of transport

23. No phase of the development hereby approved shall commence until a pedestrian and cycle signing strategy for that phase has first been submitted to, and approved in writing by the Local Planning Authority in consultation with the Highway Authority. The scheme shall satisfy the needs of all elements of the site and be constructed in accordance with the approved details in a timescale agreed in line with the phasing set out in condition 3, and thereafter retained. The Strategy to also provide details of the following:
- how those footpaths and cycle ways not adjacent to the highway are to be managed by a site management/maintenance strategy and not the local highway authority; and
 - details regarding provision for PROW FP4 through the site.

Reason: In order to satisfy the Local Planning Authority and the Highway Authority that the final details of the pedestrian and cycle network are acceptable before work commences on site and that these will be maintained thereafter.

24. Construction/demolition shall be limited to the following hours - 08.00 - 18.00 Mondays to Fridays; 08.00 -13.00 Saturdays and no activity on Sundays and Bank Holidays
- Reason: To protect neighbouring residential amenity
25. No removal of or works to any hedgerows, trees or shrubs shall take place during the main bird breeding season 1st March and 31st July inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.
- Reason: In order to protect habitats which have the potential to support breeding birds in accordance with Policy ENV2 of the Local Plan to 2032.
26. The development shall be carried out, except where modified by the conditions to this permission, in accordance with the Planning Application received by the Local Planning Authority on 18 February 2015, including the following plans:
- Proposed site location plan 14012 LP00
 - Illustrative structure plan Option 4 Revision A
- Reason: For the avoidance of doubt and so that the local planning authority shall be satisfied as to the details.
27. Any application which seeks approval for the reserved matters of layout, scale or appearance pursuant to condition 2 of this permission shall include details of the mix of type and size (including bedroom numbers) of the dwellings to be provided, which shall demonstrate compliance with the requirements of policy H2 of the Fylde Local Plan to 2032. The development shall thereafter be carried out in accordance with the duly approved details.
- Reason: To ensure that the development delivers an appropriate mix of types and sizes of housing suitable for a broad range of age groups to reflect the demographics and housing requirements of the Borough as set out in the Fylde Coast Strategic Housing Market Assessment in accordance with the requirements of policy H2 of the Fylde Council Local Plan to 2032 and the National Planning Policy Framework.

Informative notes:

Date of Decision: 11/03/2020

Signed:



Mr P. Walker

Director of Development Services
Fylde Borough Council
Town Hall
Lytham St Annes, FY8 1LW

Mr Murphy
Eric Wright Group
Sceptre House
Sceptre Way
Bamber Bridge
Preston
PR5 6AW

**IMPORTANT – PLEASE CAREFULLY READ THE NOTES BELOW AS FAILURE TO COMPLY COULD
MAKE THE DEVELOPMENT UNAUTHORISED**

- 1) These notes should be read in conjunction with the decision notice issued by the Local Planning Authority in respect of the application which you have recently submitted to the Council.

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- 2) Any permission/consent is granted on the basis of the approved plans listed in the decision notice. The development should be undertaken in strict accordance with the approved plans, as any deviation will constitute unauthorised development which may be liable to enforcement action. Any amendments to the approved plans are likely to require the submission of a further application to the Council. Should such changes be desired, you are advised to contact the Development Management Service to determine the most appropriate means by which any revisions could be considered.
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- 4) The applicant is reminded of the need to obtain formal approval of those details required by the conditions of any planning permission/consent before development may lawfully commence on the site (or any other relevant trigger as set out in each condition). Formal applications for the approval of matters reserved by condition are currently subject to fees (per request) of £34 for householder applications and £116 in all other cases. Any breach of the imposed conditions may leave you liable to enforcement action or may require you to submit a new application in order to regularise any unauthorised works.
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- 6) In undertaking any development you should ensure that you have also secured any necessary approval under the Building Regulations or any other approvals or consents required including consent from the landlord or obligations under the Party Wall Act.
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IN CASES WHERE PERMISSION/CONSENT HAS BEEN REFUSED

- 8) If the applicant is aggrieved by the decision of the Local Planning Authority to refuse planning permission/consent, they may appeal to the Planning Inspectorate. The relevant time limits to lodge an appeal

following the Local Planning Authority's refusal of permission/consent are as follows:

- a) For **householder** planning applications – **12 weeks** from the date on the decision notice.
- b) For **advertisement** consent applications – **8 weeks** from the date on the decision notice.
- c) For **minor commercial** development applications – **12 weeks** from the date on the decision notice.
- d) For **any other** types of planning application – **6 months** from the date on the decision notice.

SAVE THAT in circumstances **where an enforcement notice has been served** for the same or very similar development, the time limit to lodge an appeal (in all cases) is:

- within **28 days** from the date of the Local Planning Authority's decision if the enforcement notice was served before the decision was made, yet not longer than 2 years before the application was made.
- within **28 days** from the date the enforcement notice was served if served on or after the date the decision was made (unless this extends the normal appeal period).

Appeals must be made directly to the Planning Inspectorate and can be dealt with by exchange of written statements or heard before an Inspector at an Informal Hearing or at a Public Inquiry. Further information regarding the appeals process (including application forms) can be obtained from the Planning Inspectorate via their website - <https://www.gov.uk/planning-inspectorate>.

HLS7

Fylde Local Plan Examination

Matter 5

Housing – Site Allocations and Delivery

Hearing Statement

On behalf of Oyston Estates

1.0 INTRODUCTION

- 1.1 Cassidy + Ashton are retained by Oyston Estates [OE] in respect to a number of sites within Fylde Borough including Whyndyke Garden Village, the largest development site within the Borough, and land at North Houses Lane, Lytham St Annes which is the subject of a current planning application [ref. 17/1025].
- 1.2 In respect to the Local Plan, OE are promoting the allocation of the application site at Lytham St Annes, the identified most sustainable settlement within the Borough.
- 1.3 Comments made should be read in conjunction with our previous submissions to the Local Plan process, in particular in respect to the Submission Version of the Local Plan.
- 1.4 The format of this statement follows the Inspector's own Matters Issues and Questions dated 15th May 2017.

Matter 5 – Housing – Site Allocations and Delivery

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

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

OE has no specific comments to make.

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

OE has no specific comments to make.

Site Allocations - Policies SL1-SL5

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

Allocations should reflect the most recent consents but also identify other sites in accordance with the site selection and settlement hierarchy criteria.

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

Strategic Locations for Development have a specific role to play that is closely aligned with the Council's Settlement Hierarchy and the goal of sustainable development. By including other sites within the SLD section these policies and goals are undermined.

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

Given the extensive work undertaken to progress the Borough's largest strategic site at Whyndyke Garden Village, OE are supportive of the need for the preparation of masterplans and design codes for strategic sites. However, it should be recognised that this may have an impact upon delivery in respect to adding an additional hurdle to the planning process.

6. Is the methodology for site assessment and selection robust and justified?

The methodology for site assessment and selection is flawed and the Council's approach is at odds with the achievement of sustainable development.

Despite establishing a Settlement Hierarchy that relates closely to key factors that influence sustainable development, the Council has been inconsistent in its application. Indeed, the Council has not worked to overcome any planning hurdles or constraints and rather has taken an easy approach by pushing large numbers of new homes away from the principal settlement of Lytham St Annes.

Lytham St Annes has constraints as does any other large settlement but it is a planning authority's role to seek to overcome such constraints where possible.

In the case of Lytham St Annes, the Council has in particular failed to take into account changing circumstances that are directly related to the determination of planning applications. Such decisions can fundamentally alter the context within which a site is located, effectively removing the very constraints that have previously been applied.

Failure to take such changing circumstances into account, fundamentally undermines the Council's own methodology for site assessment and selection.

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

There are a number of concerns in respect to the proposed delivery rates for the largest site allocations.

In particular Queensway and Whyndyke Garden Village have each taken many years to progress to a reserved matters/outline application stage with no certainty of when delivery is likely to commence. Both are subject to s106 agreements of some complexity with the former reliant upon the delivery of a link road for which funding is not yet guaranteed and the latter the subject of ongoing negotiations of a cross boundary nature which has hindered progress for many years.

At the time of preparing this statement, the s106 agreement for Whyndyke Farm remained incomplete despite first being supported by Committee in June 2015. The delay is not due to the developer, rather it relates to ongoing discussions between the other interested parties.

It is therefore not clear when either site will commence.

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

OE has no specific comment to make on this matter. However, it is noted that the St Annes Neighbourhood Plan specifically did not consider housing need or allocations and we are not clear as to what certainty there is that Elswick will be able to take a different approach, given it has only reached the stage of having a plan area identified.

Policy H1

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

OE has no specific comments to make on this matter.

Policy H2 - Density and mix of new residential development

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

Although as a broad principle there is no objection to the minimum density, the policy should take account of the fact that there are certain instances where the character or setting of an area dictates that a lower density is appropriate such as in a conservation area, historic park and garden or in the setting of a listed building.

11. **Does the policy adequately address the needs of different groups in the community in accordance with the first two bullet points in paragraph 50 of the Framework?**

OE considers that there is insufficient data available to fulfil the requirements of para. 50 of the NPPF.

- 12. Should the policy include specific reference to the proportion of dwellings to be provided by size? Is this justified or could the data become out-of-date during the Plan period? Is it clear what proportions of dwelling size would be required in different locations?**

OE considers that there is insufficient data available to fulfil the requirements of para. 50 of the NPPF.

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

OE considers that there is insufficient data available to fulfil the requirements of para. 50 of the NPPF.

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

OE considers that there is insufficient data available to fulfil the requirements of para. 50 of the NPPF.

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

OE has no comments to make on this matter.

- 16. Does the policy provide sufficient flexibility to react to market forces?**

OE has no comments to make on this matter.

Policy H4 - Affordable housing

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

Such an approach has been applied at Whyndyke Garden Village but only in respect to that part of the site lying within Blackpool itself.

As developers, OE would support such an approach which could be regarded as representing positive planning, enabling the provision of affordable housing to be targeted where it is most needed, that is Blackpool town centre, where commuted sums are used to upgrade existing housing stock. However, it is recognised that this requires substantial cross-boundary co-operation.

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

OE has no specific comments to make on this matter.

Policy H5 – Gypsies, Travellers and Travelling Showpeople’s Sites

19. **In light of the new needs evidence (Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update 2016 (EL1.002)) what implication does this have for Policy H5?**

OE has no specific comments to make on this matter.

Policies H6 and H7 – Homes in the Countryside

20. **Do these policies apply to the countryside, Areas of Separation and the Green Belt? Is this clear within the policies?**

OE has no specific comments to make on this matter.

21. Is Policy H6 consistent with paragraph 55 of the Framework?

OE has no specific comments to make on this matter.

22. Is the increase in size of a replacement or extended home by no more than 33% of the ground floor area of the original home justified and based on robust evidence?

The increase of only 33% is an approach more akin to Green Belt areas where extensions should not materially increase the scale of the dwelling. It is overly restrictive for non-green belt areas and a similar approach to the neighbouring authority of Preston which allows up to 50%, should be taken.

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Fylde Local Plan Examination

Stage 3

Hearing Statement

On behalf of Oyston Estates

1.0 INTRODUCTION

- 1.1 Cassidy + Ashton are retained by Oyston Estates [OE] in respect to a number of sites within Fylde Borough including Whyndyke Garden Village, the largest development site within the Borough.
- 1.2 In respect to the Local Plan, OE are promoting the allocation of additional land at Lytham St Annes, the identified most sustainable settlement within the Borough.
- 1.3 Comments made should be read in conjunction with our previous submissions to the Local Plan process, in particular in respect to the Submission Version of the Local Plan.
- 1.4 The format of this statement follows the Inspector's own Questions dated 6th November 2017.

Session 1

Objectively assessed housing and economic development needs

- 1.5 OE refer to previous submissions on this matter, although it is noted that the Blackpool Airport Enterprise Zone Masterplan is out for Public Consultation until 21st December 2017 and should be taken into account by the Council in assessing housing and economic development needs. In particular regard should be had to:

"the aim of increasing the number of jobs on the site by 3,000 over the 25-year lifespan of the Enterprise Zone, in addition to the 1,800 jobs already on the site. There will be over 260,000 sq m of potential floor space available on the site for development, conversion or repurposing."

Session 2

Housing requirement

- 1.6 OE refer to previous submissions on this matter.

Session 3

Housing – Site allocations, 5 year housing land supply and the settlement hierarchy

- 1.7 Given the ongoing failure of the respective local planning authorities, namely Fylde and Blackpool to agree to the terms of the s106 agreement for Whyndyke Farm, questions must begin to be asked about the extent to which this site will make a full contribution to the housing land supply of Fylde over the plan period.

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HLS8

Fylde Borough Council
Development Control
Town Hall
Lytham St. Annes
Lancashire
FY8 1LW

Our ref: NO/2017/110173/02-L02
Your ref: 17/0779
Date: 02 August 2018

Dear Sir/Madam

**OUTLINE APPLICATION WITH ALL MATTERS RESERVED FOR THE
PROPOSED DEMOLITION OF EXISTING BUILDINGS AND STRUCTURES AND
RESIDENTIAL DEVELOPMENT FOR UPTO 350 DWELLINGS TOGETHER WITH
ASSOCIATED WORKS AND INFRASTRUCTURE**

LAND NORTH OF CROPPER ROAD, WESTBY WITH PLUMPTONS

Further to our previous response dated 20 October 2017, we wish to make the following comments:

Environment Agency position

Due to a change in circumstances in relation to flood risk, we now wish to object to the application until a satisfactory FRA has been submitted to address this issue.

Reasons

At the time of your previous consultation with us on the above application, the site was entirely in Flood Zone 1 (low probability of flooding) on the Environment Agency Flood Map for Planning, and this was correctly identified and assessed as such in the submitted Flood Risk Assessment (FRA) prepared by Weetwood (dated July 2017).

However, since then, we have carried out new hydraulic modelling to better understand the fluvial flood risks in the area, which has been taken into account in the recent update to our Flood Map for Planning. As a result, the application site is now almost entirely in Flood Zone 3 (high probability of flooding) and Flood Zone 2 (medium probability of flooding). This can be viewed on the GOV.UK website:

<https://flood-map-for-planning.service.gov.uk/summary?eastng=334360&northing=432489>

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Therefore, in order to comply with the requirements of the National Planning Policy Framework (NPPF), the application should now be accompanied by a FRA which is appropriate to the nature and scale of the development as proposed in Flood Zone 3 and Flood Zone 2.

Overcoming our objection

It may be possible to overcome our objection if FRA is submitted by the applicant to satisfactorily demonstrate that the development is safe for its lifetime (including climate change impacts) without increasing risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to LPA

Fylde Local Plan to 2032

We are aware that this site has been allocated for housing in the LPA's emerging Local Plan, which is currently going through examination. As such, we would advise that the LPA discusses the issue raised with the Planning Inspector as to the best way forward at this late stage.

Sequential Test

In accordance with the NPPF paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the NPPF. Our flood risk standing advice reminds you of this and provides advice on how to do this.

If the LPA determines that the Sequential Test has not been met then the Environment Agency would not support this application. The Sequential Test is applied to ensure that development is firstly placed in areas at lowest risk of flooding. If the Test is not met then the application will not be in compliance with the NPPF.

Advice to applicant

Flood risk information (flood levels)

We advise that the applicant obtains our flood risk information (e.g. a Product 4 package) to inform their FRA by submitting a request to our Customers and Engagement team at inforequests.cmbinc@environment-agency.gov.uk. This service is now available free of charge.

For further information on what flood risk information packages we offer please refer to the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#get-information-to-complete-an-assessment>

Climate change allowances

Where our flood risk data including climate change does not exist, it is the responsibility of developers to undertake this assessment using guidance in 'Flood risk assessments: climate change allowances'. Assessment of future flood risk can be undertaken using:

- Freeboard allowances
- Interpolation based on current flood risk models
- New detailed modelling.

Deciding which approach applies depends on the size, vulnerability and location of the development. It is envisaged that large scale developments (e.g. sustainable urban extensions, retail parks, large commercial developments) will need to adopt the detailed approach. Consult us to discuss this on a case by case basis. Please note we may charge for this advice.

The latest guidance on how to apply the correct, up to date climate change allowance for FRAs is available on the GOV.UK website at <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>.

Environment Agency planning advice

If the applicant requires further detailed planning advice from us following our response to this application, we may be able to provide this through our voluntary charged for service. Any request for planning advice should be submitted to clplanning@environment-agency.gov.uk. We will review the request and where appropriate, we will provide a written offer based on our planning advice charges of £100 per person per hour (plus VAT). We will not undertake any additional work until an offer has been accepted.

We will be unable to offer this service where we consider that a request is unreasonable, goes beyond what we can advise on through our planning remit or where other operational activities and issues prevent us from doing so.

Yours faithfully

Mr Alex Hazel
Planning Advisor - Sustainable Places Team

E-mail: CLPlanning@environment-agency.gov.uk

cc Emery Planning Partnership Ltd

Fylde Borough Council
Development Control
Town Hall
Lytham St. Annes
Lancashire
FY8 1LW

Our ref: NO/2017/110173/04-L04
Your ref: 17/0779
Date: 02 July 2019

Dear Sir/Madam

**OUTLINE APPLICATION WITH ALL MATTERS RESERVED FOR THE PROPOSED
DEMOLITION OF EXISTING BUILDINGS AND STRUCTURES AND RESIDENTIAL
DEVELOPMENT FOR UPTO 350 DWELLINGS TOGETHER WITH ASSOCIATED
WORKS AND INFRASTRUCTURE**

LAND NORTH OF CROPPER ROAD, WESTBY WITH PLUMPTONS

Thank you for re-consulting us on the above application following the submission of the additional hydraulic modelling information.

The applicant has submitted a letter (Ref: 2019-05-15/3203/L1; dated 15 May 2019), prepared by Weetwood, to provide further clarification on the technical issues we identified with their hydraulic model. The updated hydraulic model data has been provided to us directly.

Environment Agency position

Following our review of the applicant's updated hydraulic model and accompanying letter, we maintain our objection to the application.

We have identified a number of issues that the updated hydraulic model has not satisfactorily addressed to enable us make any changes to the Flood Map for Planning in this location. We have provided a technical model review report detailing the issues to the applicant's flood risk consultant (Weetwood).

If the applicant cannot address the deficiencies we have identified with their hydraulic model, any FRA submitted in relation to development on this site should be based on the current Flood Map for Planning and modelling which underpins it as the best available data.

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Overcoming our objection

The applicant can overcome our objection by demonstrating through a satisfactory flood risk assessment (FRA), and supporting evidence where applicable, that the proposed development would be safe for its lifetime (including climate change impacts) without increasing risk elsewhere and where possible reduces flood risk overall.

Yours faithfully

Mr Alex Hazel
Planning Advisor – Sustainable Places

E-mail: CLPlanning@environment-agency.gov.uk

Fylde Borough Council
Development Control
Town Hall
Lytham St. Annes
Lancashire
FY8 1LW

Our ref: NO/2019/111667/01-L01
Your ref: 19/0284
Date: 03 May 2019

Dear Sir/Madam

**RESIDENTIAL DEVELOPMENT OF 142 DWELLINGS WITH ASSOCIATED
LANDSCAPING AND INFRASTRUCTURE**

**LAND AT JUNCTION OF SCHOOL LANE & BAMBERS LANE, WESTBY WITH
PLUMPTONS**

Thank you for consulting us on the above application.

Environment Agency position

We object to this application and recommend refusal of planning permission for the reasons set out below in relation to flood risk.

Environment Agency position – flood risk assessment

In the absence of an acceptable flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reasons

The application site is located within Flood Zone 3 and Flood Zone 2 on the Environment Agency Flood Map for Planning. In the Planning Practice Guidance (PPG) to the National Planning Policy Framework (NPPF), Flood Zone 3 is defined as having high probability of flooding and Flood Zone 2 as having a medium probability of flooding. In accordance with the NPPF (paragraph 163, footnote 50), development proposed in Flood Zone 3 or 2 should be accompanied by an FRA which appropriate to the nature and scale of the proposed development.

The proposal is for a residential development, which is classed as 'more vulnerable' in Table 2: Flood Risk Vulnerability Classification of the PPG: Flood Risk and Coastal Change.

The FRA (Ref: 881700-R1(01)-FRA; dated 3 April 2019), prepared by RSK Land and Development Engineering Ltd (RSK), submitted with the application does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the PPG. The submitted FRA

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does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the FRA is informed by a recent hydraulic modelling study carried out by Weetwood, as part of application 17/0779 and a separate flood map challenge, which we have not accepted at this current time and therefore it cannot be used to substantiate the flood hazards or the flood zoning on site.

As such, this is fundamental to the validity of the submitted FRA as it considers the site to not be within Flood Zone 3 and proposes flood risk mitigation measures on the basis of the model being accepted. We consider this site to remain in Flood Zone 3 and 2 as currently mapped and our model data to be the best available information at this time, until we are in a position to accept a model which we consider more accurately defines the flood risk to the site.

Finished floor levels

The FRA (in section 5.3) discusses the proposed finished floor levels of the dwellings in relation to the flood levels which result from the output of the Weetwood model. Given the issues identified above, we are unable to comment on whether or not they are acceptable at this time.

Ground raising

The application proposes to raise ground levels across the site, as indicated on the 'Preliminary Finished Level plan' (Ref: SCH-AJP-ZZ-00-DR-C-1400 Rev p1; dated 16 April 2019). As the site is currently mapped as being in the fluvial floodplain the ground level on the site must not be raised without providing compensatory flood storage on a like for like basis, otherwise flood risk elsewhere will be increased.

Surface water discharge

The FRA proposes to discharge surface water run-off to the adjacent watercourses, which are designated main rivers. These main rivers drain through Red Bridge Pumping Station into the down-stream catchment. The FRA should be revised to demonstrate that the pumping regime of Red Bridge Pumping station will not be unduly altered by the development. We would be looking to hold discussions with the developer regarding the affordability of Red Bridge Pumping Station.

Overcoming our objection

The applicant can overcome our objection by submitting a revised FRA to address the issues identified above and satisfactorily demonstrate that the proposed development would be safe for its lifetime (including climate change impacts) without increasing risk elsewhere and where possible reduces flood risk overall.

The FRA will need to be revised on the basis of either the current Flood Map for Planning and Environment Agency modelled data, or a suitable hydraulic model which we have considered to more accurately reflect the flood risk to the site.

If the ground level on site is to be raised within the fluvial floodplain compensatory flood storage must be provided on a like for like basis.

If this cannot be achieved we are likely to maintain our objection to the application. We ask to be re-consulted on the revised FRA and we will provide you with bespoke comments within 21 days of receiving formal re-consultation.

FRA informatives

Section 2.1.13 of the FRA discusses the hydrology within the area of the site. It should be updated to note that there is an error on the main river mapping layer and the watercourse between the northern boundary of the site and the property known as 'The Meadows' is a designated main river, and not the watercourse between 'Lynwood Piggeries' and 'The Meadows'.

The FRA (section 5.4) identifies the requirement for Environmental Permits in relation to flood risk activities within 8 metres of non-tidal main rivers. However, we wish to highlight that a Flood Risk Activity Permit is required for excavations within 16 metres of any main river. This is likely to affect any proposed attenuation ponds within this distance.

Sequential Test – advice to LPA

In accordance with the revised NPPF paragraph 158, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the NPPF. Our flood risk standing advice reminds you of this and provides advice on how to do this.

The Sequential Test is applied to ensure that development is firstly placed in areas at lowest risk of flooding. If the Test is not met then the application will not be in compliance with the NPPF

Environment Agency position – development next to a main river

We object to this application as submitted because it involves development and landscaping within 8 metres of the main rivers adjoining the site, and we would be unlikely to grant a permit for the flood risk activities proposed as part of this application for the following reasons:-

Reasons

Based on the details submitted, the development will restrict essential maintenance and emergency access to Bambers Lane Watercourse and Marton Moss watercourse, which are designated main rivers. The permanent retention of a continuous unobstructed area is an essential requirement for future maintenance and improvement works. Consequently, based on the information available it is likely that the development cannot proceed in its present format.

Alongside the adjoining watercourses, a hatched area is indicated on the Planning Layout drawing (Ref: 1656BAK/SRB/PL01; dated 21 March 2019) as an '8m Drainage Easement to South and West'. However, it is not clear whether this has been measured from the top of the bank of the main rivers. In the absence of a clearly defined bank top based on the site specific topographic data, it is not possible to confirm that the 8 metre buffer has been accurately identified. Additionally, the watercourse along the northern

boundary of the site does not include an 8 metre buffer strip. This watercourse is actually a main river (Marton Moss) and has been incorrectly plotted on the main river mapping layer (as mentioned above under 'FRA informatives').

In particular, several surface water attenuation ponds and other water features are proposed within 8 metres of Bambers Lane Watercourse and Marton Moss watercourse along the western and northern boundaries of the site. There are also proposed trees and hedgerows within the 8 metre buffer strip which may restrict our access and should be removed or relocated.

Additionally, it is not clear whether any structures are proposed within the 8 metre buffer as part of the proposed Potential Activity Zones. Any play equipment or other such structures would require a Flood Risk Activity Permit which would not be forthcoming where our access is restricted.

Overcoming our objection

A clear 8 metre buffer strip free from development and landscaping (which may restrict our access) should be provided alongside Bambers Lane Watercourse and Marton Moss Watercourse. The 8 metre buffer should be measured from the top of the bank of the main rivers based on topographical survey data and shown on all applicable revised plans. Several cross-section drawings along the main rivers should also be submitted to demonstrate where the 8 metre buffer is measured from.

A Flood Risk Activity Permit is required for excavations within 16 metres of any main river. As such, a 16 metre margin should also be shown on the plans in relation to any proposed attenuation ponds. We would not permit any ponds within 8 metres of the main river watercourses adjoining the site.

If this cannot be achieved we are likely to maintain our objection to the application. We ask to be re-consulted on any revised/additional plans and we will provide you with bespoke comments within 21 days of receiving formal re-consultation.

Environmental permit (flood risk activities) – advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

As part of any permit application for excavation flood risk activities we would be looking for assurance that any proposed wildlife or surface water attenuation ponds would not result in damage to or endanger the stability of the banks of the watercourse before any permit could be issued.

Any proposed access crossings over the main rivers will require Flood Risk Activity Permit. We would recommend, where practicable, this is a bridge rather than a culvert. Bridges should be clear-span with the abutments set back from the watercourse on the bank tops and allow for an appropriate margin underneath. This will reduce flood risk and allow a continuous buffer strip and corridor of broadly natural character which is available for wildlife passage.

Any surface water outfalls in to the main rivers will require Flood Risk Activity Permit.

The applicant should note that the Environment Agency has a period of two months to determine a valid Flood Risk Activity Permit application. We would advise that this period is taken into account when planning works which require such a permit.

We recommend applicant considers the following guidance on the rights and responsibilities of riverside ownership:

<https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities>

Note to applicant

Should you wish us to review any technical documents or want further advice to address the issues raised, we may do this as part of our charged for planning advice service.

Further engagement will provide you with the opportunity to discuss and gain our views on potential options to overcome our objection with us, before formally submitting further information as part of your planning application.

As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems. We currently charge £100 per hour, plus VAT. We will provide you with an estimated cost for any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

We will be unable to offer this service where we consider that a request is unreasonable, goes beyond what we can advise on through our planning remit or where other operational activities and issues prevent us from doing so.

If you would like more information on our planning advice service, including a cost estimate, please contact us at the email address below.

Yours faithfully

Mr Alex Hazel
Planning Advisor – Sustainable Places

E-mail: CLPlanning@environment-agency.gov.uk

End

HLS9



Fylde Borough Council,
Development Management Team,
Town Hall,
St Annes Road East,
St Annes.
FY8 1LW

Phone: 0300 123 6780
Email: lhscustomerservice@lancashire.gov
Your ref:
Our ref: LHS/CS/05/20/0042
Date:

For the attention of Matthew Taylor.

Proposal:	Application for approval of the reserved matters of appearance, landscaping, layout and scale pursuant to outline planning permission 17/0851 for a residential development of 350 dwellings and associated infrastructure
Location:	Land to the north of Freckleton Bypass / East of Warton, Bryning With Warton
Grid Ref:	341957 - 428880

With regard to your letter dated the 29th January 2020.

(LCC) Highways recommends a refusal to the proposed 350 dwellings unless the scheme is modified as recommended in this report and are of the opinion that the scheme, as presented, will have severe impact on highway safety and the development fails to adequately promote safe access for all users and sustainable travel by modes other than car as detailed within this report.

The planning department are also advised to consider the impact on highway amenity regarding emergency vehicle access and car parking provision, as detailed in this report.

(LCC) Highways understands the current reserved matters planning application is concerned with the internal layout of the site only and the site access and impact on the surrounding highway infrastructure was approved by planning application 17/085. This application was approved by the planning inspectorate as part of appeal Ref: APP/M2325/W/19/3221605. The comments within this report are therefore based on the proposed internal highway issues only.

This report has also been based on the revised layout being proposed as part of planning application 20/0057 for 14 dwellings and it is also understood the applicant is looking to discharge conditions 1 and 15 of planning application 17/0851.

(LCC) Highways have based this report on the details shown on drawings:-

- SK668-PL-RM-01 rev A "Planning Layout Reserved Matters Application"
- SK668-PL-FUL-01 rev B "Planning Layout Full Application"

Discharge of conditions

(LCC) Highways has made the following comments regarding the discharge of conditions Condition 1 – Phasing Details and condition 15 – Pedestrian and cycle links to north west and south west -

Condition 1 – Phasing Details

This condition can be discharged

Condition 15 – Pedestrian and cycle links to north west and south west

This condition should not be discharged as detailed in the "sustainable Links" comments below.

Sustainable Links

(LCC) Highways are of the proposed Pedestrian and cycle links to north west and south west are not to an acceptable layout.

It is recommended:-

1. The links to be 3.5m wide shared surface routes.
2. The routes to be overlooked to provide security for users and reduce the likely hood of unsocial behaviour.
3. Cyclists should be able to pass pedestrians at the corners without causing a collision to provide security for all users.
4. The forward visibility along the shared surface cycle route to be suitable for 15mph speeds, this will also increase a desire to use the route where blind corners are removed and reduce unsocial behaviour.
5. Signing and lining is also required along the routes to provide security for users and reduce the likely hood of unsocial behaviour.
6. The routes to be illuminated to provide security for users and reduce the likely hood of unsocial behaviour.

(LCC) Highways are of the opinion that the proposed pedestrian cycle routes as presented do not provide an acceptable route that is inclusive and safe place for all users or promotes social interaction; encourages walking and cycling; provides a high quality walking and cycling networks; a safe and suitable for all users; the needs of people with disabilities and reduced mobility in relation to all modes of transport have not been addressed; have not created a places that is safe secure and attractive to use or minimises the scope for conflicts between pedestrians, cyclists; the routes will not function well and do not add to the overall quality; or create places that are safe, inclusive and accessible. Where the recommended improvements are not provided as detailed above (LCC) Highways would recommend a refusal.

Internal Highway Layout

(LCC) Highways are of the opinion that the highway layout and car parking dose not conform to current guidelines; recommendations; the philosophy of Manual for Streets;

Creating Civilised Streets; the National Planning Policy Framework; the Joint Lancashire Structure Plan or the Fylde Local Plan.

In addition the shown highway layout would not meet with the standards expected for the estate road to be adopted by Lancashire County Council as the Highway Authority and the applicant is advised to consider the highway adoption comments within this report as part of the planning process for this development where they wish to offer the road for adoption. The following changes are recommended to bring the highway layout and car parking up to acceptable standards:-

1. The internal spine and access roads are to be designed as a self-policing 20mph road with better use of horizontal deflection, vertical deflection such as road humps and cushions should be limited and will not be permitted where the route is to be used by buses. Typically the speed reducing features to be at a maximum of 75m centres. To allow safer pedestrian movements within the estate by reducing vehicle speeds and also aid vehicles reversing in and out of drives.
2. Trees have been shown on the grass verge fronting the main spine road entering the site and an access road. These trees are obstructing sight lines from drives and junctions at the detriment to highway safety prove the sight lines from all drives and junctions based on a "X" distance of 2m from drives and 2.4m at the junctions the "Y" distance on the main spine road to be based on an estimated 85th percentile speed of 30mph and the "Y" distance on the short access road to be based on an estimated 85th percentile speed of 20mph.
3. A turning head is required to allow refuse vehicle and emergency vehicles to turn within the site for the following reasons: -
 - The maximum distance a refuse vehicle should reverse is 12m, from Manual for streets and BS5930: 2005.
 - Fire and rescue Services Section should not have to reverse more than 20m from the end of an access road. From Manual for streets and diagram 24 of Approved Document B (Fire Safety).

Additional considerations when locating the turning head are:-

- 25m is the maximum distance a two wheeled refuse container is to be transported to the refuse wagon. From Manual for streets and BS5930: 2005.
- A resident should not be required to carry the waste more than 30m to the refuse storage point. From Manual for streets and BS5930: 2005.
- A fire appliance needs to be able to approach to a point within 45m of a suitable entrance to any dwelling. From Manual for Streets and section 11.2 of Approved Document B (Fire Safety).

The turning head to be either a prescribed "Access Way" turning head from Lancashire County Council Residential Design Guide or the applicant to prove the turning head layout by swept path analysis a rear twin axel refuse vehicle (11.2m long). The applicant should provide accurate details of the required turning head before determining the application and the turning head protected under condition, for perpetuity. The reversing distance is to be measured from the main kerb line of the access road and not the end of the turning head. See plots 218, 235, 246 and 247.

4. The main spine road entering the site is adjacent to a brook without details a structure may be required to support the highway additional issues regarding the future maintenance to be considered as the brook will not be adopted as part of the highway.

5. The 150% car parking provision for plots 56-63; 129-132 147-150; 185-188; 190-192, 214-217; 229-231; 234-235; 257-260, 286, 293-295, 296-298, this is acceptable providing the spaces are not designated to an individual property
6. The recommended minimum internal single garage size to be 6x3m and this includes integral garages.
 - The Joint Lancashire Structure Plan "Car Parking Standards" page 5 recommends the minimum internal dimension for all single garages to be a minimum of 6x3m and page 17 clause F.4.3 states "Individual garages, of minimum dimensions of 6 x 3m, count as one parking space. The Joint Lancashire Structure Plan "SPG access and parking" page 29 also states for residential parking "A garage is counted as one parking space. Where constructed garages should have minimum dimensions of 6 x 3 metres". Where garages are smaller than the recommended minimum internal dimension of 6 x 3m they should not be counted as a parking space and the applicant should provide an additional parking space for each garage affected.
 - Clause 8.3.41 on page 109 from Manual for Streets also recognises the many authorities now recommend a minimum garage size of 6 x 3m, where garages are smaller than the recommended minimum internal dimension of 6 x 3m they should not be counted as a parking space and the applicant should provide an additional parking space for each garage affected.
 - The recommended length of 6m is based on the length of a large family car (Ford Mondeo Estate 4.58m long), clearance between the car and the garage door, with room to open and close the garage door (600mm), room at the front of the car (800mm) for possible access to the dwelling, work bench, storage, storage of cycles, bins gardening equipment etc.
 - The recommended width of 3m is based on the width of a large family car (Ford Mondeo Estate 2.09m wide), clearance at the passenger side to the wall (200mm), clearance at the drive side of the car and the garage (700mm), with room to open car door for less able bodied.

Affects house types Ashbourne (22no) Baybridge (12 No) Lymington (13 No), New Walton (12 No) and Oakham (13No)
7. Single vehicle wide drives to have a minimum width of 3.2m where they are used for vehicular access and pedestrian access to the property. From Approved Document M (Access to and use of buildings). Clause 6.15-b and 6.17-a, recommends an unobstructed widths of at least 900mm to access the property.
8. The double vehicle wide drives to have a minimum width of 5.6m where they are used for vehicular access and pedestrian access to the property. From Approved Document M (Access to and use of buildings). Clause 6.15-b and 6.17-a, recommends an unobstructed widths of at least 900mm to access the property.
9. Under part M of the Approved Documents a level access is required into new properties and generally a mobility ramp is associated with the level access. Ensure the mobility ramp and level access does not encroach into the parking bays.
10. Where the private drives are sandwiched between walls and fences, the Wyre Local Plan(adopted 28th February 2019), Appendix B, page 184 it is recommended that the drives to have a minimum clear width of 3.0m, to provide additional room to open the doors. The recommended width of 3m is based on the width of a large family car (Ford Mondeo Estate 2.09m wide), clearance at the passenger side to the garage (200mm), clearance at the drive side of the car and the garage (700mm), with room to open car door for less able bodied.

11. Where the parking bays are adjacent to walls and fences on one side, it is recommended that the drives to have a minimum clear width of 2.6m, to provide additional room to open the doors.
12. Where 2 parking bays are parallel and are adjacent to walls and fences on both sides, it is recommended that the drives to have a minimum clear width of 2.6m each, to provide additional room to open the doors.

(LCC) Highways are of the opinion that the proposed development as presented does not provide an inclusive and safe place where patterns of movement, streets, parking have been considered; a safe and suitable access to the site can be achieved for all users; an unacceptable impact on highway safety and does not give priority first to pedestrian and cycle movements or address the needs of people with disabilities and reduced mobility in relation to all modes of transport; the scheme does not create places that are safe, secure and attractive or minimise the scope for conflicts between pedestrians, cyclists and vehicles or allow for the efficient delivery of goods, and access by service and emergency vehicles. Where the recommended improvements are not provided as detailed above (LCC) Highways would recommend a refusal.

Future highway adoption considerations

(LCC) Highways are of the opinion that the shown internal highway layout is to an acceptable adoptable layout for adoption under section 38 of the 1980 Highways Act.

The guide lines within Manual for Streets and Lancashire County Council's "Creating Civilised Streets" do not provide specific highway adoption requirements to cover future highway risks, maintenance and access to properties and statutory undertaker's equipment etc. Further guidelines regarding acceptable highway adoptable layouts can be found in the "Lancashire County Council Residential Road Design Guide" and the construction of the highway to be found in the "Lancashire County Council Specification for Estate Roads 2011 edition".

(LCC) Highways are of the opinion that the shown internal highway layout is not to an acceptable adoptable layout for adoption. The applicant is advised to consider the recommendations below as part of this application, where they wish to offer the road for adoption under section 38 of the 1980 Highways Act: -

1. The internal access roads are to be designed as a self-policing 20mph road with better use of horizontal deflection, vertical deflection such as road humps and cushions should be limited and will not be permitted where the route is to be used by buses. Typically the speed reducing features to be at a maximum of 75m centres. To allow safer pedestrian movements within the estate by reducing vehicle speeds and also aid vehicle reversing in and out of drives.
2. All trees should be removed from the service verge, as they are not performing a highway function and they are a highway maintenance and safety issue which the highway authority is not willing to accept and additional issues with street lighting provision and safe levels. The trees would only be permitted within the adoptable highway if a section 96 agreement of the 1980 Highways Act is entered with the district authority and they accept full liability for the trees for perpetuity. The section 96 agreement would need to be entered with the district authority before the section 38 agreement is entered. Where the district authority is willing to accept liability for

the trees the sight lines to be provided as recommended in the Internal Highway Layout comments.

3. Remove the grass service verge from the site access road and relocate at the back of the footpath, the grass verge is not performing a highway function and is a highway maintenance issue the highway authority is not willing to accept in this location. Consider relocating the grass verge to the back of the footpath could then be deeded to the appropriate house owner or Management Company to maintain. Private ownership of the verge adjacent to the highway would not be considered as this restricts access for maintenance of the segregated footpath and over running / parking on the verge.
4. The car parking levels and standards to be provided as recommended within this report, due to the impact on amenity and highway safety this is a future liability the Highway Authority would not want to manage, as a solution would not be achievable after construction works have finished.

Where the recommendations above are not implemented the highways may not be considered suitable for highway adoption by Lancashire County Council and they will remain private, this may have a long term detrimental impact on highway safety and maintenance of the roads unless an acceptable Private Management and Maintenance Company can be established by the applicant.

(LCC) Highways are of the opinion that the below standard highway would have a detrimental impact on future highway maintenance; highway safety and amenity which the Highway Authority would not want to manage as a solution to rectify the layout / car parking would not be achievable after construction works have finished and/or at a cost to the highway authority.

(LCC) Highways recommends the local planning authority attaches conditions requiring an agreement between the applicant and the local highway authority under Section 38 of the Highways Act 1980 or the constitution and details of a Private Management and Maintenance Company confirming funding, management and maintenance regimes. To ensure that the estate streets serving the development are completed and thereafter maintained to an acceptable standard in the interest of residential / highway safety; to ensure a satisfactory appearance to the highways infrastructure serving the development; and to safeguard the visual amenities of the locality and users of the highway.

The reasoning for the above recommendations and conditions at the end of this report are based on the Department of Transport Advice Note "Highway Adoptions" The adoption of roads into the public highway (1980 Highways Act). Which was published in April 2017

Any proposed sustainable drainage systems under the adoptable highway will only be considered acceptable where they are adopted by United Utilities under the powers of the Water Industry Act 1991 or they only retain highway surface water.

The applicant is also advised that the adoptable highway surface water drainage system must not be used for the attenuation or storage of any flood waters from the adoptable United Utility surface water system or any private surface water drainage system etc.

To allow early discussions between all parties, to achieve a more seamless planning and future section 38 agreement process (LCC) Highways are offering a pre application

highway advice service and further advices can be found at www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/pre-planning-application-highways-advice-service . In addition to this service we are also offering a pre application flood risk and Land Drainage advice service at www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/pre-planning-application-flood-risk-and-land-drainage-advice-service .

The applicant is advised to begin early discussions between the Highway Authority's section 38 officers at Lancashire County Council, the Lead Local Flood Authority at Lancashire County Council and United Utilities as advised in the Department of Transport Advice Note "Highway Adoptions" "The adoption of roads into the public highway (1980 Highways Act)", published in April 2017.

The National Planning Policy Framework (2019) paragraphs 39 to 42 encourage take-up of the pre-application services offered above.

Conclusion

(LCC) Highways recommends a refusal to the proposed 350 dwellings unless the scheme is modified as recommended in this report and are of the opinion that the scheme, as presented, will have severe impact on highway safety and the development fails to adequately promote safe access for all users and sustainable travel by modes other than car as detailed within this report.

The planning department are also advised to consider the impact on highway amenity regarding emergency vehicle access and car parking provision, as detailed in this report.

Conditions

Should you be minded to grant planning permission, (LCC) Highways would like to be re-consulted and given the opportunity to suggest a number of highway related planning conditions for this development.

If you have any questions please do not hesitate to contact me.

Yours sincerely

Stewart Gailey
Highway Development Control

Matthew Taylor

From: SM-Defra-Cheshire2 Lancashire <Cheshire2.Lancashire@defra.gov.uk>
Sent: 06 May 2020 17:33
To: Matthew Taylor
Cc: SM-Defra-Cheshire2 Lancashire
Subject: Re 20/0042 & 20/0057 - Warton - Natural England Response correction

Dear Matthew

Re 20/0042 & 20/0057 - Warton - Natural England Response

Thank you for your email of 15 April 2020.

Natural England has noted that a shadow HRA has been produced by TEP (Ecological Assessment Report Appendix H HRA Scoping Report) and submitted by the applicants, and I can confirm that we have reviewed the details of this HRA.

Our previous advice to you in our response dated 18 March 2020 still stands, however we provide the following clarification on the further information that should be provided in order to fully assess the proposals, and we provide this advice to your authority on the assumption that you intend to adopt the shadow HRA by TEP to fulfil your duty as competent authority.

In summary, at the current time Natural England advises your authority not to adopt the shadow HRA as there is insufficient information to rule out impacts on the designated sites and their features.

The shadow HRA lacks up to date information on non-breeding bird data and we consider that further details are needed on the proposed mitigation measures for recreational pressure, therefore we advise the following:

1. A check is required for up to date non-breeding bird data to inform the HRA. Natural England ruled out impacts in 2016 based on survey evidence available at the time, however this is now considered out of date. The HRA needs to be supported by updated evidence and we advise in this instance contacting [The Fylde Bird Club](#) to check for additional relevant data for the site and the surrounding fields. We advise this includes the fields surrounding the site as this is where SPA birds were recorded previously.
2. Consideration has been given to the in-combination impacts of recreational pressure but the HRA should also consider the alone impacts of recreational pressure on the surrounding fields that may be functionally linked to the Ribble & Alt Estuary SPA and Ramsar site, which are within 2km of the development site.
3. We note that in Part 2 of the assessment (11. Proposed Mitigation) it is stated that *'at the time of writing this report the proposed mitigation is not known'* and would advise that in order for the assessment to comply with the Habitats Regulations (2017) certainty is required for all mitigation measures and therefore must be detailed within the Appropriate Assessment.
4. A number of mitigation measures for recreational pressure have been mentioned within the HRA however more detail is required including information on the GI network, what additional footpaths are to be provided including route lengths and connectivity, and where links to alternative green space will be created. At the current time there is insufficient clarity and a lack of certainty on the measures being provided.

If you have any further queries please do let me know.

Yours sincerely

Helen

Helen Rogers
Cheshire, Greater Manchester, Merseyside & Lancashire
Natural England, Hornbeam House, Electra Way
Crewe, CW1 6GJ

*Please send documents to me by email, not post, while our office is closed.

<http://www.gov.uk/natural-england>

- During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>
- Stay at home, protect the NHS, save lives



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HLS10

**Health**

Former Wesham Park Hospital set for demolition

Demolition of the former Wesham Park Hospital is due to start on Monday and expected to take five months.

By Tony Durkin

Friday, 5th June 2020, 7:00 am



The former Wesham Park Hospital

After the hospital closed in 2011, the site continued to be used as offices by NHS Fylde and Wyre Clinical Commissioning Group (CCG) and other tenants but has been vacant since November last year.

NHS Property Services, which has been tasked with the demolition, says the repurposing of the vacant site, in Derby Road, will help the NHS make significant savings on running costs and better use of the space.

After the site has been cleared, it is proposed that half of the land will be developed for new clinical use, with the local CCG having already indicated its aim to develop a new state of the art health centre, which would provide capacity for the two GP practices in Kirkham as well as a variety of community services.

The other half of the site has been determined to not be of use for clinical purposes and looks set to be made available for sale.

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Phillip Potter, senior transaction manager at NHS Property Services, said: “Parts of the site have been unoccupied for a significant period.

“The repurposing of the site will now enable the local health community to achieve their objectives as well as putting redundant public land back into economic use. The money generated from this part disposal will be reinvested straight back into the NHS.”

A CCG spokesman said the building is not to be confused with Wesham Rehabilitation Unit in Mowbreck Lane, which is entirely separate and has been unoccupied for a lot longer.



Promoted Stories

HLS11

Title Number : LA653097

This title is dealt with by HM Land Registry, Fylde Office.

The following extract contains information taken from the register of the above title number. A full copy of the register accompanies this document and you should read that in order to be sure that these brief details are complete.

Neither this extract nor the full copy is an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy.

This extract shows information current on 2 JUL 2020 at 14:33:05 and so does not take account of any application made after that time even if pending in HM Land Registry when this extract was issued.

REGISTER EXTRACT

Title Number	: LA653097
Address of Property	: Valentines Turkey Farm & Kennels, Wildings Lane, Lytham St Annes (FY8 3RJ)
Price Stated	: £1,100,000
Registered Owner(s)	: DAS LIMITED (incorporated in Isle of Man) of 14 Athol Street, Douglas, Isle of Man, IM1 1JA.
Lender(s)	: Keith Alexander Strachan Keith Alexander Strachan Tynwald Pensions Limited Tynwald Pensions Limited

Title number LA653097

This is a copy of the register of the title number set out immediately below, showing the entries in the register on 2 JUL 2020 at 14:33:05. This copy does not take account of any application made after that time even if still pending in HM Land Registry when this copy was issued.

This copy is not an 'Official Copy' of the register. An official copy of the register is admissible in evidence in a court to the same extent as the original. A person is entitled to be indemnified by the registrar if he or she suffers loss by reason of a mistake in an official copy. If you want to obtain an official copy, the HM Land Registry web site explains how to do this.

A: Property Register

This register describes the land and estate comprised in the title.

LANCASHIRE : FYLDE

- 1 (03.09.1990) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Valentines Turkey Farm & Kennels, Wildings Lane, Lytham St Annes (FY8 3RJ).

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

- 1 (19.11.2019) PROPRIETOR: DAS LIMITED (incorporated in Isle of Man) of 14 Athol Street, Douglas, Isle of Man, IM1 1JA.
- 2 (19.11.2019) The price stated to have been paid on 8 November 2019 was £1,100,000.
- 3 (19.11.2019) RESTRICTION: No disposition of the registered estate by the proprietor of the registered estate is to be registered without a written consent signed by the proprietor for the time being of the Charge dated 8 November 2019 in favour of Keith Alexander Strachan and Tynwald Pensions Limited referred to in the Charges Register or their conveyancer.

C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The land is subject to the following rights reserved by a Conveyance of the land in this title dated 31 May 1963 made between (1) Henry Talbot De Vere Clifton and Leonard Harry Urry (Vendors) and (2) Guardian Land Holdings (Lytham) Limited (Purchaser):-

EXCEPT AND RESERVING to the Vendors and to all persons now entitled thereto rights of drainage and sewerage through the sewers drains and watercourses in upon or under the said plots of land AND ALSO EXCEPT AND RESERVING to such persons as are at the date hereof entitled thereto rights to maintain drains and pipes over and along some parts of the said plots of land as exist at the date hereof.
- 2 A Conveyance of the land in this title dated 2 March 1990 made between (1) Guardian Land Holdings (Lytham) Limited (Vendor) and (2) Joseph Brian Valentine and James Patrick Valentine (Purchasers) contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 3 (19.11.2019) REGISTERED CHARGE dated 8 November 2019.
- 4 (19.11.2019) Proprietor: KEITH ALEXANDER STRACHAN of Glion Yea, Orrisdale Road, Kirk Michael, Isle of Man, IM6 2HL and TYNWALD PENSIONS

C: Charges Register continued

LIMITED (incorporated in Isle of Man) of 29/31 Athol Street, Douglas, Isle of Man, IM1 1LB the trustees of Strachan Personal Pension Scheme.

Schedule of restrictive covenants

- 1 The following are details of the covenants contained in the Conveyance dated 2 March 1990 referred to in the Charges Register:-

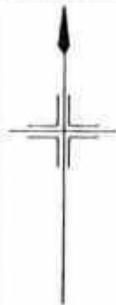
THE Purchasers HEREBY COVENANTS with the Vendor so as to benefit the Vendors adjoining land and each and every part thereof and so as bind the Property hereby conveyed and each and every part thereof into whosoever hands the same may come (but not so as to render the Purchasers shall have parted with all interest in the Property hereby transferred) in the terms of the covenant set out in the Schedule hereto

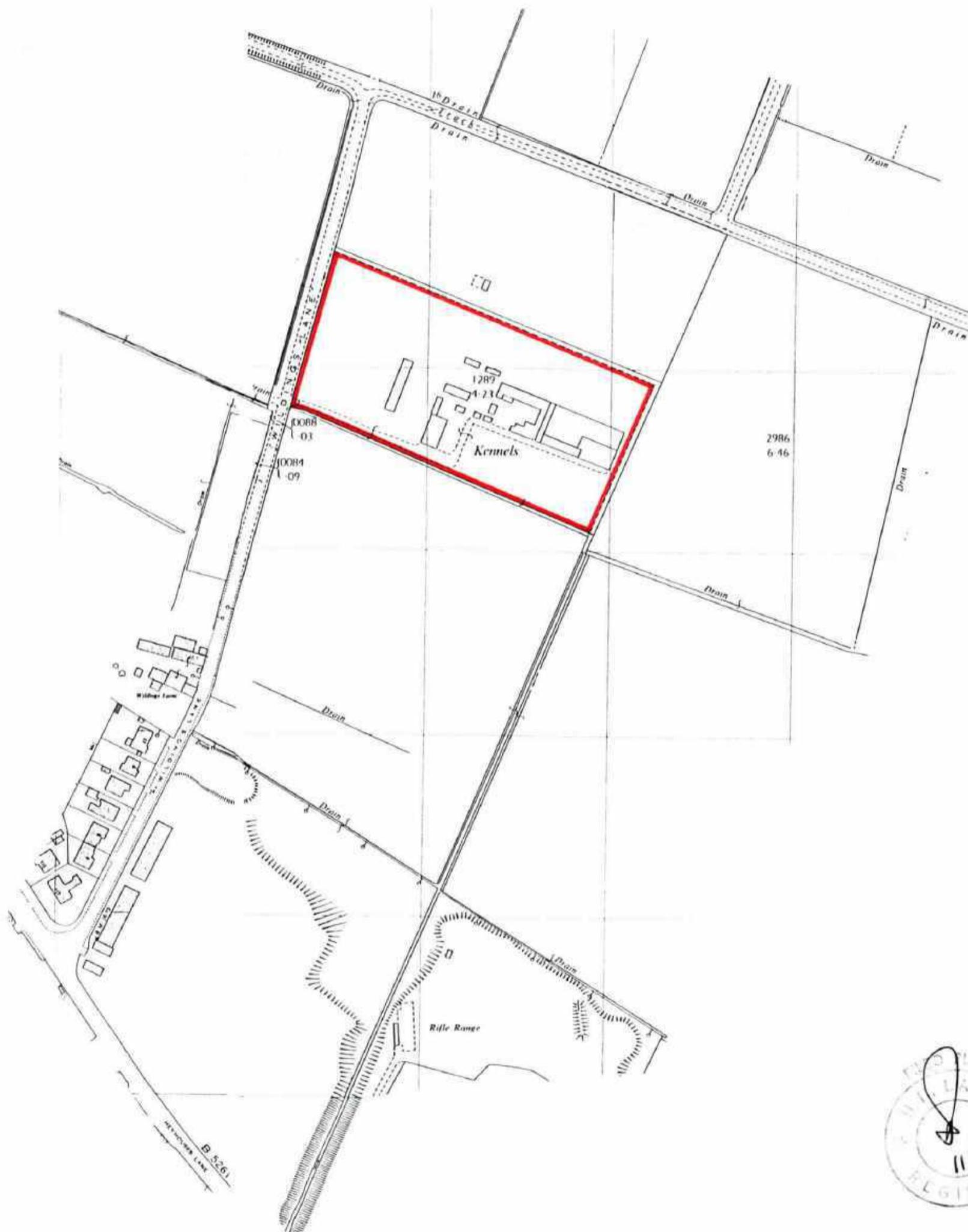
THE SCHEDULE

1. Not to erect on any part of the Property hereby conveyed any buildings erections or fixtures other than those intended to be used and in fact used in connection with the use of the land for the carrying on of the business of a market gardener poultry keeper kennel keeper or grazier
2. Not to erect any private dwellinghouse on the Property
3. Not to keep any poultry on the land shown coloured blue on the plan attached hereto and to ensure that any poultry kept on the Property is suitably penned
4. Not to do or permit or suffer to be done anything in or upon the Property or any part thereon which may be or become a nuisance annoyance or inconvenience to the Vendor or the lessees owners occupiers of any of the Vendord adjoining or neighbouring land
5. To put and keep in good repair and condition all fences hedges walls cops gates gate posts stiles roads dams pumps wells water troughs ponds watercourses ditches drains and platts and without prejudice to the generality of the forgoing as and when necessary to hang new gate and set up new gate posts and to keep the hedges plashed and to lay such hedges as required to be laid such plashing and laying to be done at the proper season of the year and to keep all ditches and watercourses on the Property or adjoining the boundaries thereof open and free from obstruction and where there are crossings by footpaths bridlepaths roads or other ways of the watercourses to ensure that such crossings are constructed and maintained so that the watercourses are suitable pipes or culverted so as to be capable of taking all water in such watercourses at flood level
6. To keep the property in a neat and tidy condition and free from thistles nettles docks and other noxious weeds and free from vermin."

NOTE: Copy plan filed.

End of register

H.M. LAND REGISTRY		TITLE NUMBER		
		LA 653097		
ORDNANCE SURVEY PLAN REFERENCE	SD 3429	Scale 1/2500		
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By email: planningpolicy@fylde.gov.uk

2 July 2020

Dear Planning Policy Team,

I am writing to you on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester with comments on the Council's Draft Annual Position Statement (APS), which sets out the sites which provide the Council's five-year housing land supply for the base date 1st April 2020.

CPRE, The Countryside Charity

We want a thriving, beautiful countryside for everyone. We're working for a countryside that's rich in nature, accessible to everyone and playing a crucial role in responding to the climate emergency. With a local CPRE group in every county, we're advocating nationwide for the kind of countryside we all aspire to: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before. We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate.

Draft Annual Position Statement (APS)

We note the Council has identified a 6.1 year supply of land. The Council has to be careful that this is not too marginal, as developers will quickly argue sites are unviable to whittle it away.

In November 2019 we wrote to the Council concerning the supplementary planning document for affordable housing and we set out the flaws with the Government's approach to calculating housing requirements using the flawed standard method and out of date Office of National Statistics 2014 data that vastly inflates the number of houses to be built on greenfield with harm to the countryside. The introduction of the Housing Delivery Test in July 2018 penalises the public as if failed, yet more land is allocated for housing. Identifying a high housing requirement that cannot be met is

problematic. We urge for realism in the figure and application of up to date data. We urge for a low buffer to be added to give the Council a chance of success against the Housing Delivery Test.

In the past few days we have listened to the 'build, build, build' mantra of the prime minister. We agree enough new homes ought to be built, particularly affordable homes for people who need it most, but we are aware that there are already a vast number of extant permissions for residential developments, but the viability loopholes allow developers to argue sites are unviable to chase permissions on their interests in gaining higher values for farmland when permitted for housing. All CPRE seeks is a functioning planning system that allocates sites via a democratic system, so housing doesn't end up on land never intended to be built, such as land that is highest grade farmland, as witnessed by the vexatious appeals allowed on Fylde's high grade farmland. These land assets ought to be protected for future generations. We all need food security.

There are plans to deregulate further the planning system. CPRE believes that deregulating planning and cutting up red tape simply won't deliver better quality places. It's already far too easy to build poor quality homes. Our research has shown that three quarters of large housing developments are mediocre or poor in terms of their design and should not have been granted planning permission. Transferring decision making power from local councils and communities and handing them to developers is the exact opposite of 'building back better'.

In our view, the best way to deliver the places that we need, at the pace we need them, is to make it easier for local councils to get local plans in place, and then to hold developers to those plans. One glimmer of hope in the prime minister's words was those prioritising building on brownfield to release pressure on greenfield sites. But if we are to truly build back better, and 'level up' across the country, we need to make sure the voice of local communities are strengthened in shaping the homes and places that they will inherit.

So with this sentiment in mind we hope that the planning policy team will seek to include as many brownfield sites as is possible, including those identified already on the brownfield register, and any more that exist but are as yet to be fully recorded. Our brownfield research last year showed one in seven homes completed is located on previously developed land, which only became available to the market twelve months previously. These windfall sites are an important source of land and should be adequately reflected in the assumptions. In effect the supply of brownfield land is endless. We note the change to the definition of deliverable yet again moves the goal posts for the Council and makes it even harder to demonstrate a five year housing land supply. The Government really has shown a developer focus with all the recent changes.

Of course it is important that the authority does comply with duty to cooperate, but we note other neighbours, such as Lancaster District with the soon to be adopted local plan could deliver some of Wyre's unmet need, on existing brownfield to protect land in the countryside. Plus, the more urban authorities of Blackpool and Preston that need more housing investment, might be able to accommodate shortfalls, rather than Fylde, which is predominately rural and has many environmental designations and natural assets such as Best and Most Versatile farmland.

We acknowledge the over-achievement of housing completions against the housing targets as set out in Tables 2 and 3 of the Draft Annual Position Statement 2020. Well done for this achievement. In addition we applaud the legal challenge to the appeal decision when the Inspector erred in law. It is due diligence such as this that helps save land in the countryside by supporting the local plan policies and allocations.

Summary

Fylde has beautiful countryside, which we want protecting for future generations. Local plan led housing help to guide sustainable development. We hope planners will continue to do what they can within the current regime to look after rural Fylde, and we hope you are able to prioritise brownfield sites for development as a priority in principle.

Yours sincerely



Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager



A company limited by guarantee, Registered number: 5291461, Registered charity number: 1107376

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Submitted by email to: planningpolicy@fylde.gov.uk

02 July 2020

Dear Sir/Madam,

Re: Fylde Draft Annual Position Statement 2020

Introduction

This letter provides Gladman Developments Ltd's (Gladman) representations on the Draft 2020 Fylde Borough Council Annual Position Statement (APS). This follows our previous comments on the Council's 2019 APS consultation document in July 2019, prepared by Emery Planning Partnership on our behalf.

National Planning Policy and Guidance

The national planning context for the preparation of Annual Position Statements and demonstrating a deliverable five-year supply of housing land is contained in the National Planning Policy Framework (The Framework) and Planning Practice Guidance (PPG) on Housing Supply and Delivery.

In this respect, paragraph 73 of the Framework advises that in order to maintain a sufficient supply of housing land:

"Local authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local need where the strategic policies are more than five years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply"*

In paragraph 74, the Framework further outlines that:

"A five year supply of deliverable housing sites, with the appropriate buffer, can be demonstrated where it has been established in a recently adopted plan, or in a subsequent annual position statement which:

- a) Has been produced through engagement with developers and others who have an impact on delivery, and has been considered by the Secretary of State; and*
- b) Incorporates the recommendations of the Secretary of State, where the position on specific sites could not be agreed during the engagement process"*

Further guidance on the process of preparing an Annual Position Statements is provided under the 'Confirming 5 Year Housing Land Supply' section of the PPG on Housing Supply and Delivery.

In this regard, PPG ID: 68-012 states that:

"Where a local planning authority has a recently adopted plan (as set out in the the National Planning Policy Framework) and wishes to confirm their 5 year land supply position through an annual position statement, they will need to advise the Planning Inspectorate of their intention to do so by 1 April each year.

To ensure their assessment of the deliverability of sites is robust, the local planning authority will also need to carry out an engagement process to inform the preparation of the statement, before submitting their statement to the Planning Inspectorate for review by 31 July of the same year..."

Under the heading of "What information will annual position statements need to include", PPG ID: 68-014 advises that "Assessments will need to be realistic and made publically available in an accessible format as soon as they have been completed", whilst on the topic of engagement, ID: 68-015 advises that:

"Authorities will need to engage with stakeholders who have an impact on the delivery of sites. The aim is to provide robust challenge and ultimately seek as much agreement as possible, so that the authority can reach a reasoned conclusion on the potential deliverability of sites which may contribute to the 5 year housing land supply..."

Deliverable Housing Sites

For the purposes of assessing whether a site can be considered 'deliverable' and therefore suitable for inclusion in an authority's five-year housing land supply assessment or Annual Position Statement, Annex 2 of the Framework advises that:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- (a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans);*
- (b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield*

register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

Further guidance on what can constitute a deliverable housing site is again provided in the PPG on Housing Land Supply and Delivery (PPG ID: 68-007), which provides examples of the evidence that is needed to demonstrate the deliverability of so-called 'category b' sites under the Framework's definition. This includes:

- Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- Firm progress with site assessment work; or
- Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

The definition of a deliverable housing site in the context of the latest Framework has also been explored in a number of notable Appeal decisions.

These include Land on East Side of Green Road, Woolpit, Suffolk¹, where the Inspector made clear that the onus was on the local authority to provide clear evidence to demonstrate the deliverability of sites with outline planning permission and those allocated in an adopted Local Plan, and that only sites that fall within the definition of deliverable at the base of an authority's assessment should be included in a Council's five-year land supply calculation:

"...The Council's supply of deliverable sites should only include sites that fall within the definition of deliverable at the end of the period of assessment i.e. 31 March 2018. Sites that have received planning permission after the cut-off date but prior to the publication of the AMR have therefore been erroneously included within the Council's supply. The inclusion of sites beyond the cut-off date skews the data by overinflating the supply without a corresponding adjustment of need. Indeed that is why there is a clear cut-off date set out in the AMR..."

On this point, an Appeal decision in Bures Hamlet, Braintree², considered whether it would be reasonable to conclude that sites that were subject to a resolution to grant planning permission but subject to a S106 at the base date of an authority's assessment are deliverable. In this regard, the Inspector concludes that:

"...However, I agree (with the Woolpit decision) that new planning permissions after the base date should be excluded and that would include permissions subject to a resolution to grant subject to a Section 106 obligation. Uncertainty about when such an obligation would be completed could put back a potential start date by months or even years..."

¹ Land on East Side of Green Road, Woolpit, Mid Suffolk APP/W3520/W/18/3194926, paragraph 67

² Land off Colchester Road, Bures Hamlet, Braintree APP/Z1510/W/18/3207509, paragraph 62

Fylde's Draft 2020 Annual Position Statement

The remainder of these representations draw on the aforementioned elements of national planning policy and guidance to comment on the merits of Fylde's Draft 2020 Annual Position Statement document.

Housing Requirement

In accordance with the paragraph 73 of the Framework, it is agreed that the starting point for calculating Fylde's five-year housing land supply position is the Council's adopted Local Plan housing requirement.

In this respect, Policy H1 of the adopted Fylde Local Plan to 2032 sets out how the Council will apply a minimum housing requirement of 415 net homes per annum for the plan period 2011 – 2032, ensuring there is enough deliverable land to provide a continuous 5 year land calculated against this target from the start of each annual monitoring period.

However, we question whether this housing requirement has been applied correctly by the Council when calculating its five-year land supply position in the current draft 2020 APS.

In this regard, the table presented on page 24 of the draft 2020 APS uses a baseline figure of 479 dpa as its starting point for the authority's assessment, referring to this as the 'Local Plan Residual Housing Requirement incorporating earlier shortfall'. This stems from a rebasing exercise that took place in 2017, to address the shortfall in delivery that had been accrued up to that point (952 dwellings) over the remainder of the Local Plan period to 2032 via the 'Liverpool' method.

We consider that the starting point figure for the Council's assessment should be 415 dpa in line with the Council's adopted housing requirement. Any cumulative shortfall or surplus in housing provision should then be used to amend this target on a rolling basis in each annual update to the Council's land supply position, to provide a new residual requirement for the rest of the Local Plan period.

This is the same approach that would have been adopted when setting the residual figure of 479 dpa in 2017, i.e. taking account of the amount of housing that had already been delivered up to that point. In this context, we disagree with the Council's approach to addressing the oversupply of 150 units that has been recorded since the Local Plan 'rebasings' in April 2017.

The Council appear to factor this oversupply into its five-year land supply calculation in its entirety, rather than apportioning it out over the remainder of the Local Plan period, as it did with undersupply in 2017. We submit that this approach is wrong, and that the oversupply should be combined with any shortfall up to the base date of the Council's latest assessment (1st April 2020) to establish a new residual annual housing requirement for the Council's calculation.

Applying the above in practice would result in a revised annual housing requirement of **2,563, or 513 dpa** (including a 10% buffer) to be used as the basis of the Council 2020 APS five-year housing land supply calculation. This is worked out as follows:

- Total completions for first 9 years of Local Plan period (2011/12 – 2019/20) – 3,125 dwellings
- Equivalent housing requirement for same period - 3,735 dwellings (415 dpa x 9)
- Undersupply against adopted housing requirement for first 9 years of Local Plan period – 610 dwellings

- Residual housing requirement for remaining 12 years of Local Plan period – 5,590 dwellings, or 466 dpa (415 x 12,+ 610 dwelling shortfall, ÷ 12)
- Revised baseline requirement plus 10% buffer – 2,563 dwellings, or 513 dpa

We therefore believe that this figure of **2,563 dwellings** must be used as the starting point for calculating the Council's housing land supply position, rather than the requirement of 2,470 dwellings that is currently included in the draft 2020 APS document.

Engagement and Consultation

As advised in the Framework and PPG, engagement with stakeholders is key to ensuring that a Council's Annual Position Statement provides a true and robust representation of an authority's deliverable housing land supply for the following 12-month period.

However, as currently prepared we are concerned that this key element of the APS process has not been met in the case of Fylde. Other than the delivery notes that have been provided for certain sites in the Council's Draft Five-Year Housing Trajectory (Draft 2020 APS Appendix 1), there is no evidence to support the Council's assumptions, or that it has sought to engage with site promoters or house builders to check their delivery intentions.

Not only does this undermine the credibility of the Council's assessment by failing to provide the 'clear evidence' that is required by the Framework and PPG to justify the inclusion of some sites in the authority's deliverable supply, but it prevents any proper scrutiny of the Council's claimed land supply position. It is considered that this is particularly critical when preparing an APS document, given their intended lifespan and the limited opportunities that will be provided to test site delivery information again (e.g. through a S78 Public Inquiry).

We further question whether the period for inviting comments on the draft 2020 APS (approximately three weeks) has provided sufficient opportunity to make representations on the document. As a potentially important material consideration in the determination of planning applications, we would have expected consultation to last for a period of at least six-weeks, as per standard statutory timescales for the preparation of planning policy documents.

The Framework and PPG make clear that one of the purposes of engagement when preparing an APS is to provide robust challenge on site delivery assumptions. Without any site delivery evidence or correspondence from site promoters or developers at this stage, we contend that this part of the APS process has not been satisfactorily addressed.

The Impact of Covid-19 on Delivery Assumptions

Another factor that needs to be taken into account in the preparation of the Council's Draft 2020 APS is the impact of the current Covid-19 outbreak.

Whilst the movement restrictions that were originally introduced in March 2020 are gradually being eased, it is clear that the Government's 'lockdown' measures had a significant impact on the housebuilding industry. These led to a partial or complete suspension of construction activities on almost all housing schemes, whilst it is likely to be some time before housebuilders can return to full capacity whilst continuing to adhere to social distancing measures.

Although it is difficult to accurately forecast the fallout from these measures moving forward, the Covid-19 outbreak is likely to have caused commencement delays on some sites included in the

Council's housing trajectory, and the potential for lower than predicted delivery rates from others during the remainder of five-year supply assessment period.

In light of this, we believe that it would now be prudent to revise the Council's current delivery forecasts to ensure they reflect a post-Covid situation. We note that this point is now being raised in recent Appeal decisions, as can be seen with reference to a scheme in Finchampstead, Berkshire³:

"The Covid-19 pandemic is likely to have implications for the housebuilding industry as with other sectors of the economy. The evidence indicates that a number of developers are temporarily closing their construction sites to protect employee and customer welfare. For those remaining open, the lockdown will impact on the availability of support services. Customer confidence is also likely to be reduced with a consequent effect on the buying and selling of property.

The Appellant has concluded that the effects would be felt for a 3 to 6 month period, which does not seem unreasonable. On that basis the conclusion is that a further 168 dwellings should be removed from the trajectory to take these factors into account. Whilst it is contended that this is an optimistic assessment, it is equally possible that a bounce back will occur once the crisis ends. Indeed, it is reasonable to surmise that housebuilders and their suppliers will be keen to rectify losses if it is possible to do so.

At this stage the economic effects of Covid-19 cannot be known. However, even if all of the impacts suggested by the Appellant are accepted, the Council would still be able to demonstrate about 5.2 years supply of deliverable sites."

In paragraph 4.25 of the draft 2020 APS, the Council explain why they believe that it would be inappropriate to apply blanket reductions to its housing land supply forecasts as a result of Covid-19, and are instead relying on individual site promoters to explain the extent to which the delivery of their sites is likely to be affected.

However, with the exception of one site listed in the Council's draft Five-Year Housing Trajectory, (Clifton House Farm), there is currently no evidence to suggest that any such engagement has taken place with applicants or developers, and that any adjustments have been made to the Council's claimed supply of deliverable housing sites.

In the absence of any other discounts for the Covid-19 outbreak, it is difficult to ascertain whether the delivery assumptions contained in the draft 2020 APS are an accurate depiction of housing delivery over the next five years.

Small Scale Sites – Non-Implementation

Paragraphs 4.28 to 4.30 of the Draft 2020 APS discuss the case a for non-implementation discount, with the Council explaining why they believe this is not justified when assessing their land supply position.

We recognise that the Framework deems small-scale sites (schemes of less than 10 units) to be deliverable unless there is evidence to the contrary, but in reality a number of these permissions are unlikely to be implemented. We note that this was previously acknowledged and accepted by the Council, with the authority incorporating a 10% discount to its projected supply from small planning permissions in past housing land supply assessments.

³ Land North of Nine Mile Ride, Finchampstead, Berkshire APP/X0360/W/19/3238048, paragraphs 109 - 111

This is particularly relevant when a number of small sites in the Council's Draft Five-Year Housing Trajectory only benefit from outline planning consent, with no commentary on further progress or when a reserved matters application will be submitted.

On this basis will believe that should be case for incorporating a 10% non-implementation discount into the Council's land supply calculation.

Individual Site Predictions

We have reviewed the Draft 5 Year Housing Trajectory provided at Appendix 1 to the draft 2020 APS document and the delivery forecasts in contains. Taking into account the Framework and PPG definitions of 'deliverable', we provide the following observations on specific sites.

Valentines Kennels, Wildings Lane, St Annes – 114 Dwellings

The Council's Draft Housing Trajectory table predicts that this site will deliver 114 units in a single year (2023/24). It records that the corresponding planning application was resolved to be approved on 15th January 2020 subject to the completion of a S106 and planning conditions.

At the present time the Council's website indicates that the corresponding S106 agreement is still to be agreed. Other than the information provided in the Council's site delivery notes, no further evidence has been provided to support the authority's assumption that this site will deliver 114 units as suggested.

As a site only had a resolution to grant planning permission at the base date of the Council's assessment, and no clarity has been provided on when the accompanying S106 agreement will be resolved or when this scheme is likely to come forward, we believe that the 114 units forecast to be delivered from this site should be removed from the APS document at this stage.

Conclusion – remove 114 dwellings from the Council's supply.

Hole in One, Forest Drive, Lytham St Annes – 22 Dwellings

This is another scheme that only benefited from a resolution to grant planning permission at the base date of the Council's assessment. The Council's corresponding delivery notes identify that this resolution was subject to access details and the agreement of a S106 agreement.

At the present time the Council's website indicates that the corresponding S106 agreement has yet to be agreed, some six months after the application was reported to the authority's planning committee, and there is no evidence that the access details mentioned in the Council's notes have been agreed.

As a site that did not have planning permission at the base date of the Council's assessment, and with no clarity on the status of the S106 and access issues, we believe that all 22 units should be removed from the Council's deliverable land supply.

Conclusion – remove 22 dwellings from the Council's supply.

Whyndyke Farm, Preston New Road, Whitehills - 30 dwellings

This a long-standing proposal that received outline planning consent in 2015 for a mixed-use development including 1,400 residential dwellings, 20 ha of B2/B8 uses, a new primary school and two local neighbourhood centres.

The Council's Draft Housing Trajectory table records that the applicant's agent is working towards a scheme for commencement, but further applications have been submitted to vary the extent of highway works needed at the initial stages.

Despite delivery from this site being forecast within five years in a number of past housing land supply assessments, this has failed to materialise. We therefore question whether the assumption that 30 units will be delivered in year 2024/25, on the basis that a reserved matters application must be submitted by January 2021 is a robust assessment of delivery from this complicated site.

Whilst we have no comments on the merits of this proposal, as it only currently benefits from outline planning permission, and with no certainty that completions will take place in 2024/25, we believe that 30 units should be removed from the Council's assessment.

Conclusion – remove 30 dwellings from the Council's supply.

Cropper Road East, Whitehills – 105 dwellings

This is an allocated site in the Council's Local Plan and is predicted to deliver a total of 105 dwellings in the current five-year period from 2021/22 onwards.

The Council's site delivery notes advise that the site is the subject an outline planning permission, with all matters reserved except for access, granted on 11th March 2020. Further reserved matters applications will need to be submitted and approved before any dwellings can come forward, and there is currently no evidence that these are being prepared.

The authority's delivery notes also describe the contents of some email correspondence with the applicant – this advises that actual delivery rates may differ from those recorded in the Council's trajectory, as these will "depend on the developer who takes on the site".

This creates a level of uncertainty as to whether completions will come forward as suggested by the current applicant/the Council. It also highlights that the site will need to be taken on by/marketed to developers before any housing can be provided.

We question whether sufficient evidence has been provided to demonstrate that this site will come forward as anticipated. As it only benefits from outline planning permission, and there is no robust evidence to support the Council's delivery assumptions, we believe that all 105 dwellings should be removed from the Council's supply at this stage.

Conclusion – remove 105 dwellings from the Council's supply.

Cropper Road West, Whitehills – 70 dwellings

This site is an allocation in the Council's adopted Local Plan and is subject to an outline planning application for 350 dwellings.

However, as the authority's delivery notes describe, since the allocation was made the Environment Agency have remodelled the flood risk for the area, resulting in the majority of the site being placed Flood Zones 2 and 3. A copy of the Environment Agency's latest flood map is provided as Appendix A to these submissions.

Whilst it is apparent that the applicant is in discussions with the Environment Agency (EA) to find a solution that would enable the site to come forward, it is far from clear whether this dialogue is sufficiently advanced to justify the assumption that 70 units will be delivered from the site in the five-year period.

Although we recognise that this site could provide housing over the longer term, given the current uncertainty created by the Environment Agency's revised position, and the fact that the site is yet to benefit from an outline planning consent, we believe that all 70 dwellings should be removed from the Council's deliverable land supply assessment.

Conclusion – remove 70 dwellings from the Council's supply.

Cropper Road West (Bambers Lane Site), Whitehills – 99 dwellings

Similar to the site at Copper Road West described above, this site is also an adopted Local Plan allocation, but has since been reclassified as Flood Zone 2 and 3 by the Environment Agency.

The Council's delivery notes again describe how the applicant has engaged consultants to prepare a hydraulic model to challenge the EA's position, but it is far from clear whether this has addressed the EA's concerns or led them to lift their holding objection to the applicant's proposals.

We recognise that this site has the potential to deliver housing over the longer-term, once the situation regarding the site's flood risk status has been resolved. However, in the absence of a solution to this matter, and any formal planning consent, we believe that all 99 dwellings should be removed from the Council's deliverable housing land supply assessment.

Conclusion – remove 99 dwellings from the Council's supply.

Land North of Freckleton Bypass, Warton – 120 dwellings

This site is forecast to deliver 120 dwellings in the five-year period. However, whilst the Council's delivery notes record that the site currently benefits from outline planning consent, the corresponding reserved matters application was submitted on 24th January 2020, and is yet to be determined.

The Council's delivery notes also describe how a further planning application seeking permission in full for an additional 14 units was submitted on 31st January 2020. As this application was undetermined at the base date of the Council's assessment, these additional 14 dwellings should not currently contribute to the Council's supply position.

As the corresponding reserved matters application was undetermined at the base date of the Council's assessment, and no evidence has been provided to demonstrate how this is progressing and any outstanding issues are being addressed, we believe that all 120 dwellings must be excluded from the authority's deliverable land supply at this stage.

Conclusion – remove 120 dwellings from the Council's supply.

Clifton House Farm, Lytham Road, Warton – 96 dwellings

The site is predicted to deliver 96 dwellings in the five-year period. It benefits from outline planning consent, with a subsequent reserved matters application being approved on 23rd March 2020.

However, the Council's Five-Year Housing Trajectory records that a further reserved matters application is currently pending after being submitted on 5th February 2020. The Council's Public Access system records that this is a duplicate submission of the earlier reserved matters consent, and furthermore that it has been submitted by the land promoter and not a developer.

Although we acknowledge that a reserved matters consent was in place at the base date of the Council's latest assessment, it is unclear whether this will be implemented given the new reserved matters submission that has since been made. It is also unclear whether the predicted delivery rates will be achievable with this consent in place, given that the site will likely have to be marketed to a developer.

Whilst do not dispute that this site will come forward in the longer term, we currently believe that there is insufficient certainty to include it within the Council's five-year supply. We therefore believe that all 96 dwellings should be removed from the authority's APS at this stage.

Conclusion – remove 96 dwellings from the Council's supply.

Brook Mount, 4 Lytham Road, Warton - 26 dwellings

This site is predicated to deliver 26 units in year 2022/23. However, the Council's site delivery notes describe that it is subject to an undetermined planning application that was received on 2nd July 2020. No further evidence is provided to support the site's inclusion in the Council's draft five-year housing trajectory.

As a site that is yet to receive planning permission, and with no further evidence or updates on its delivery prospects, we believe that all 26 units should be removed from the Council's land supply assessment.

Conclusion – remove 26 dwellings from the Council's supply.

Former Wesham Park Hospital, Derby Road, Wesham – 51 dwellings

The Council's delivery notes describe how the authority's planning committee resolved to grant outline planning permission for this site on 18th March 2020, subject to the completion of a S106 agreement.

The Council's notes further advise that demolition of the existing buildings was due to commence on 8th June 2020 and last for a period of 6 months, based on an article that was published in the local press. However, no further evidence has been provided to support the authority's delivery assumptions.

As a site that only had a resolution to grant planning permission at the base date of the Council's housing land supply assessment, and with no clarity on the status of the accompanying S106 agreement and when this is likely to be agreed, we believe that all 51 dwellings should be removed from the authority's deliverable land supply assessment.

Conclusion – remove 51 dwellings from the Council's supply.

97 Kirkham Road, Freckleton – 7 dwellings

This scheme is predicated to deliver 7 dwellings in year 2020/21 after receiving a resolution to grant planning permission on 15th January 2020.

However, 3 months of 2020/21 have already passed, and there is no evidence that the corresponding S106 agreement has been finalised and signed. Whilst we recognise that there is a reasonable prospect of completions from this site coming forward within the five-year period, this is considered to be an ambitious timescale.

Although this is a 'small site', in the absence of a signed S106 agreement at the base date of the Council's assessment, we also believe that there is a case to remove all 7 units from the Council's land supply assessment.

Conclusion – remove 7 dwellings from the Council's supply.

Land North of Beach Road, Elswick – 50 dwellings

This site is predicted to deliver 15 dwellings in year 2020/21, followed by 30 units in 2021/22 and 5 in 2022/23. However, the Council's notes advise that the applicant has recently submitted an application to vary Condition 2 of the original planning permission relating to housing types.

It appears that this variation of condition application is still to be determined. Although there is a prospect that all 50 units could come forward in the five year period, at the very least we would suggest that the Council's delivery timescales need to be amended to reflect the fact that 15 dwellings are unlikely to be delivered in 2020/21.

Conclusion – question the Council's projected timescales.

Land North of North View Farm, Wrea Green – 21 dwellings

This is another scheme that only benefitted from a resolution to grant planning permission at the base date of the Council's assessment, subject to signing a S106 agreement (which is still to be agreed).

Applying the strict application of the principles endorsed by the Woolpit and Bures Hamlet Inspectors described earlier in these submissions, we believe that there is a case for removing all 21 dwellings from the Council's land supply assessment.

Conclusion – remove 21 dwellings from the Council's supply.

Cobweb Barn, Oak Lane, Newton – 30 dwellings

This is a site for 30 affordable dwellings, with 15 completions due in 2022/23 and 15 in 2023/24. However, the site is currently the subject of an undetermined planning application, and no further site-specific evidence has been provided to justify its inclusion in the Council's land supply assessment.

Whilst there is a reasonable prospect that all 30 dwellings could be completed in the five-year period, there is no planning permission in place or evidence to confirm the site's deliverability at the base date of the Council's assessment. We therefore believe that there is a case to remove all 30 dwellings from the authority's land supply trajectory.

Conclusion – remove 30 dwellings from the Council's supply.

Merlewood Country Park, Cartford Lane, Little Ecclestone – 82 dwellings

This is a scheme for 82 residential park homes following an appeal to remove a previous occupancy condition relating to the site. This condition appears to have restricted the permanent use of the site to 8 months of the year between 1st March and 31st October, with only holiday use allowed in the remaining four-month period.

However, reviewing the associated appeal decision and supporting documents, it is unclear how this change in position will be implemented. The appellant's statement of case refers to the c.140 caravans that are currently present on the site being replaced by 82 modern park homes, but there are no timescales associated with this. It is presumably these park homes that will be occupied on a permanent basis.

Whilst we accept that the recent appeal decision would allow the permanent occupation of the site now (albeit limited to 82 caravans), if it is the intention that this will only happen once the existing units have been replaced, this suggests that the 82 units forecast to be delivered in 2020/21 should be pushed back.

Conclusion – question the Council's projected timescales.

Conclusions on Deliverable Housing Land Supply

The above site assessments would result in the removal of **791 dwellings** from the Council's draft five-year housing trajectory. This would leave a revised deliverable supply figure of 2,200 units for the five-year period 2020/21 – 2024/25 (compared to the Council's figure of 2,991 dwellings).

It should be noted that this is before any further discounts that may be required to provide a realistic, post-Covid forecast. As described earlier in these representations, we believe that these discounts must be factored into the Council's delivery forecasts to provide a robust housing land supply position.

When combined with the Council's re-assessed baseline requirement of 2,563 dwellings, this would result in a housing land supply figure of **4.33 years**.

Conclusions

Through its draft 2020 APS, Fylde Borough Council claim that they can demonstrate 6.01 years' worth of housing supply for the period 2020/21 – 2024/25.

However, for the reasons explained in these representations, we believe that this provides an inaccurate representation of the Council's housing land supply position:

- The Council's assessment uses an incorrect baseline requirement as the starting point for the authority's land supply calculation. Rather than a figure of 2,470 dwellings, we believe that this should be a minimum of 2,563 units
- No clear evidence has been provided to support the Council's delivery claims. In accordance with the Framework and PPG, this is required to demonstrate that the authority's position is an accurate and robust representation of likely housing delivery over the five year period. Furthermore, the absence of this information makes it difficult to properly scrutinise the authority's site delivery forecasts, and undermines the purpose of engagement in the APS process

- The Council's assessments should be revisited to provide a post-Covid situation. Given the partial or complete shutdown of construction activities on housing sites during the Covid-19 outbreak, housing delivery on some schemes may be slower than originally anticipated. It is critical that this factored into the Council's trajectory.
- A review of the Council's deliverable supply assessments suggests that 791 units should be removed from the authority's trajectory. This would result in a revised housing land supply position of 4.33 years, before any further discounts are applied to take account of the current Covid-19 outbreak, or a non-implementation rate.

Consequently, Gladman believe that the Council have failed to prepare a robust APS, and the authority's land supply falls short of the required 5 years.

It should be remembered that the requirement to demonstrate a five-year housing land supply is a minimum and not maximum obligation. In this respect, the Council should continue to be supportive of sustainable housing schemes that are capable of boosting the authority's deliverable land supply position.

This is particularly relevant in the case of Fylde, in light of recent Government projections (the 2018-based household projections released on 29th June 2020) that suggest there is a need to deliver more than the 415 dpa that are currently required by the authority's adopted Local Plan.

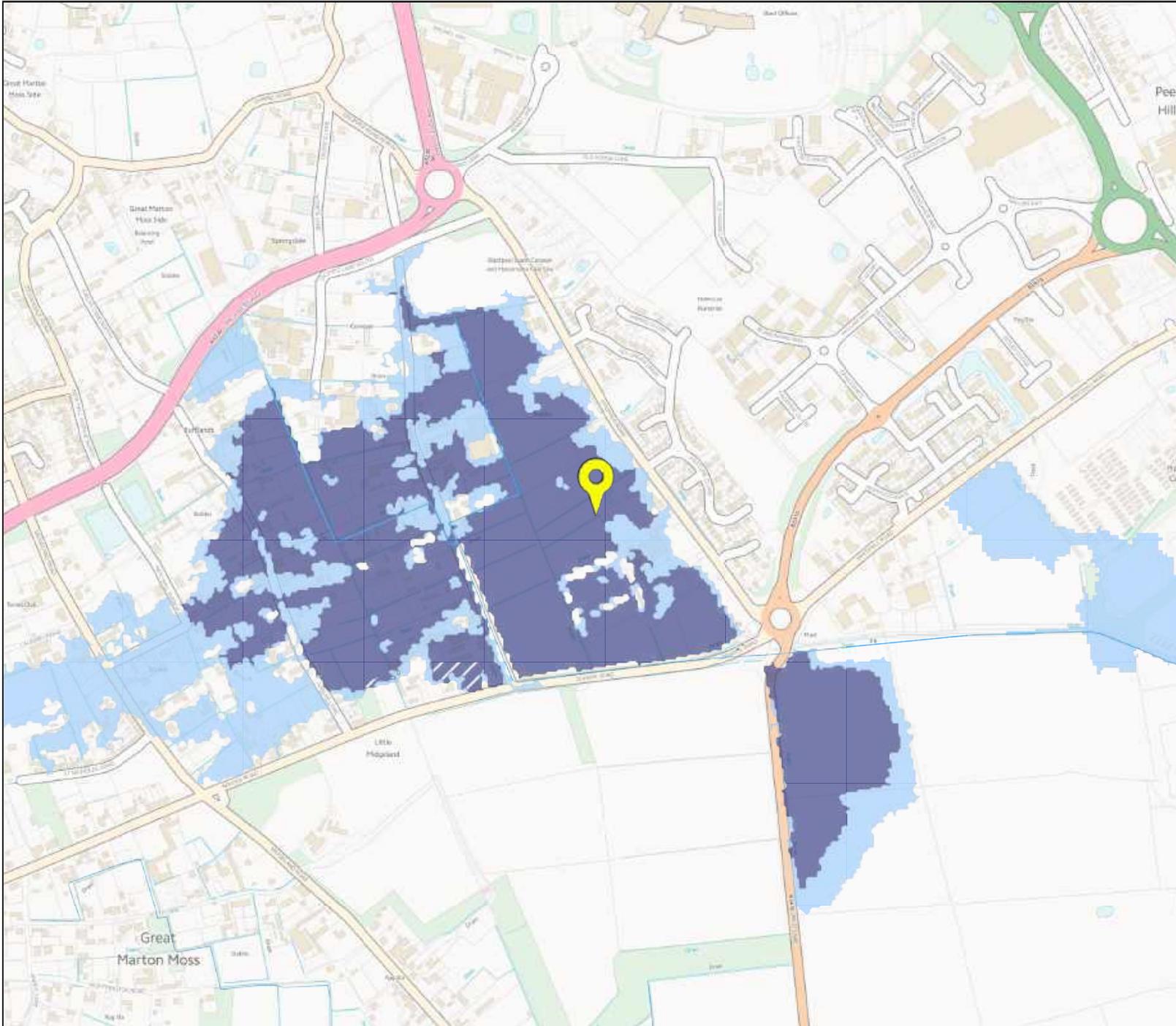
Gladman hope that the Council finds these representations constructive. We would be happy to discuss any of the points raised in further detail if required.

Yours faithfully



Peter Dutton
Gladman Developments Ltd
Tel: 07800 721141
Email: p.dutton@gladman.co.uk

Appendix 1 – Cropper Road Flood Risk Map



Flood map for planning

Your reference
Cropper Road

Location (easting/northing)
334452/432513

Scale
1:10000

Created
1 Jul 2020 9:32

-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefiting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area



FYLDE COUNCIL FIVE-YEAR HOUSING LAND SUPPLY DRAFT ANNUAL POSITION STATEMENT – CONSULTATION

PWA Planning Response

July 2020

/1 INTRODUCTION

- 1.1. PWA Planning are acting on behalf of landowners and developers within the Fylde local authority area to consider and comment on the draft version of Fylde Council's Five-Year Housing Land Supply Annual Position Statement, published June 2020.
- 1.2. The Draft Annual Position Statement indicates that at 1st April 2020, Fylde Council can demonstrate 6.01 years of housing land supply.
- 1.3. The Council welcomes comments from stakeholders and other interested parties on the information contained within the document, including:
 - *The Council's overall methodology and assumptions, including lead-in times and build-out rates;*
 - *The Council's assessment of likely delivery on individual sites. The Council particularly wishes to hear from the landowners/developers of the sites included, in relation to delivery on their own site(s).*
- 1.4. PWA Planning are unconvinced that the draft 2020 Annual Position Statement published by Fylde Council demonstrates a robust five-year supply position.

/2 RESPONSE TO DRAFT ANNUAL POSITION STATEMENT

Housing Requirement Figure

- 2.1. The Five-Year Housing Supply period which the draft Annual Position Statement is based on is between 1st April 2020 – 31st March 2025.
- 2.2. The Fylde Local Plan to 2032 sets a minimum housing requirement of 415 net homes per annum for the plan period 2011 – 2032. The residual requirement, which incorporates the longstanding backlog, equates to 479 net dwellings per annum, as detailed within the supporting text of Local Plan Policy H1.

Dealing with the Backlog

- 2.3. Although under PPG guidance, the “Sedgefield” method should be used in order to deal with the level of deficit within the next five-year period, the Inspector at the Local Plan examination determined that the “Liverpool” method was appropriate. This has also been written into Local Plan Policy H1c. It is nonetheless notable that prior to the adoption of the Local Plan to 2032, there was a residual requirement of 7,177 dwellings.

Appropriate Buffer

- 2.4. The Council has used an appropriate buffer of 10%, in accordance with NPPF paragraph 73b, given that the Council wishes to demonstrate a five-year supply of deliverable sites through an annual position statement.
- 2.5. As noted in Paragraph 73c of the NPPF, a 20% buffer should be used where the Housing Delivery Test result falls below 85% of the housing requirement, which is considered to represent a significant under delivery of housing. Fylde’s result from the 2018 Housing Delivery Test is 172% and Fylde have provided within the Annual Position Statement the 2019 result of 183%. It is therefore accepted that the appropriate buffer to be used should be 10%.

Five Year Supply of Deliverable Sites

- 2.6. The Draft Annual Position Statement sets out that, as detailed within Appendix 1, for the total five-year supply of deliverable sites (2,991 dwellings), there would be 2,408 dwellings to be delivered within Strategic Locations. This equates to 80% of the total supply and therefore, there is clearly a reliance on allocated sites delivering the vast majority of the housing requirement within the next five years.
- 2.7. Of the total five-year supply of deliverable sites, it is predicted that 31% (823 dwellings) are to be provided through the following 5 sites:

Site	Site Ref.	Total dwellings (2020-2025)
Queensway, St Annes	HSS1	125
Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	180
Land North of Blackpool Road, Kirkham	HSS9	135
Blackfield End Farm, Warton (1)	HSS2	139
Blackfield End Farm, Warton (2)	HSS2	150

- 2.8. It should be highlighted that within Fylde there has been a longstanding delay in sites delivering the expected number of dwellings and the five-year supply position relies on the delivery of the sites highlighted above, without any fluctuation in delivery rates.
- 2.9. According to the 2018 Housing Land Position Statement, base date of 31st March 2019, there was an expected delivery of 888 dwellings for the year 2019-2020. The actual figure, as indicated on the 2020 draft Annual Position Statement was 634 dwellings.
- 2.10. It is notable that between 2011 and 2019, there was an average delivery of 346 dwellings per year within Fylde. The expected delivery for the next year (2020-2021), is anticipated to be 896 dwellings, which is significantly higher than previous years and a substantial increase from the 634 dwellings last year (2019-2020). Given the

longstanding issues arising from the delayed build out rates within Fylde, it is considered that the current position of 6.01 years is therefore precarious.

- 2.11. It is considered that a more smoothed completion rate across the 5 years is a more likely scenario. If the expected completion rates were evenly distributed across the 5 year horizon, this would give annual rates of around 600 units, which is a more likely scenario than a 30% increase in build rates which are already above the historical trend.
- 2.12. The APS (paragraph 4.25) seeks to argue that the impact of the Covid-19 pandemic is uncertain but that it is unlikely to create material differences during the five-year time horizon. Given the significance of the APS in the context of ensuring adequate delivery of housing, it is considered that this is too bullish a position to adopt and a more realistic proposition is that the Covid-19 impact would be to push back delivery starts and ongoing completions by between 6 and 12 months. The overall effect would be to mean that all of the completion assumptions would be 'shunted' on by up to 12 months.
- 2.13. Assuming a more smoothed completion rate across the 5 years and combining the effect of Covid-19, which is most easily quantified by assuming that the year 5 (2024 – 2025) is removed from the assessment, would give a revised assessment as follows.

FBC assumed five-year supply (deliverable)		+ 2,991
Smoothed annual completions		(598)
Less deductions due to Covid-19 delays (year 5 removed from equation)		-598
Net five-year supply		2,393
Equivalent supply	2,393/494	4.84 years

2.14. PWA Planning therefore are of the opinion that Fylde Council is assuming a robust housing supply position at April 2020, which is not fully reflective of the need to use more realistic completion rates across the Borough as a whole and the impact of Covid-19. The housing supply relies heavily on strategic sites continuing their delivery rates, however, there are longstanding delays of sites within Fylde to deliver dwellings as expected. It is highly unlikely that next year there would be the delivery of 896 dwellings, given previous delivery rates. If the sites identified above do not deliver the number of dwellings as predicted, and the effects of Covid-19 are to shift completions on by 12 months this could lead to a housing supply position of under 5 years.



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Phone: 01772 5 36289

Fax:

Email: SchoolPlanning@lancashire.gov.uk

Your ref:

Our ref:

Date:

Dear Sir or Madam

Lancashire County Council School Planning Team has received notification from Fylde Borough Council of their consultation **Five Year Housing Land Supply, Draft Annual Position Statement June 2020**.

Responses to the consultation will be submitted to The Planning Inspectorate who will consider whether the correct process has been followed, and if the evidence demonstrates a 5-year supply of deliverable housing sites. Therefore we ask that you accept the response below from Lancashire County Council as part of that submission.

The document has been reviewed, any specific comments will refer to the unique draft document reference number if it is perceived a comment is required.

Education Strategy

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. The [Strategy for the provision of school places and school's capital investment 17/18 to 19/20](#) provides the context and policy for school place provision and schools capital strategy in Lancashire. Over the coming years, Lancashire County Council and local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

The SPT produces an [Education Contribution Methodology document](#) which outlines the Lancashire County Council methodology for assessing the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.

The Department of Education has produced new guidance updated November 2019

Non-statutory guidance for local authorities planning for education to support housing growth and seeking associated developer contributions, November 2019.

This guidance and its purpose enables the local authority with the education responsibility to evidence the need and demand of school places new housing development will have on community infrastructure, including education

The evidence supplied through the planning process will identify the impact, and set out the mechanisms for securing developer contributions required to mitigate their impact.

The guidance promotes good practice on pupil yield evidence, engagement with local planning authorities and the delivery of expanded or new schools with funding from housing development.

Further information and details regarding the new guidance can be found by using the link <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

Response to the consultation

Introduction

It is evident the County of Lancashire and the country as a whole are facing significant challenge in all sectors of the economy due to Covid 19 pandemic. It is too early to know what the long term impact this crisis will have across all sectors, in particular the housing market and the delivery of new homes to meet the Governments housing targets.

It is noted that the Local Planning Authority LPA has not changed the annual yield of new housing set out and adopted in their local plan 2032. However, information from developers may offer a different view following this consultation.

The consultation will also be submitted to The Planning Inspectorate. At all stages The School Planning Team will endeavour to provide the LPA with updated information to assist in this process.

Partial Review of the Fylde Local Plan 2032 FLP32

Points 2.6 to 2.9 make reference to the partial review of FLP32 which was approved for publication March 2020, this is currently suspended due to Covid 19. In this section the LPA refers to meeting the unmet delivery of neighbouring district Wyre Borough Council WBC and the policies relating to this. The school planning team are aware and will be responding to WBC Annual Position Statement Draft Consultation 2020 and also aware WBC Local Plan partial consultation is suspended due to Covid 19. The school planning Team will monitor progress of both reviews and respond accordingly

The five year Housing Land Supply HLS from the LPA is a crucial piece of information used by The School Planning Team to forecast the impact new housing will have on the education provision across the Fylde planning area. Assumptions are applied when forecasting the education position assuming the housing will be delivered in full within the five years HLS. This information is of particular importance on strategic housing development sites with phasing of delivery critical if a new school is identified as part of the development infrastructure.

We rely on the LPA to work with developers and land owners to gather as much detail as possible. This information enables School Planning to provide the LPA with a five year education forecast with a high percentage of accuracy, and is key in the planning application assessment process.

The forecasted position is reviewed annually with the LPA providing a new HLS which is then combined with national statistics such as the birth rate to identify the changing need, and provision of mainstream education. This information is highlighted to the LPA and identifies the areas of priority to be considered through stakeholder engagement, master planning and district wide Infrastructure Delivery Plans IDP.

In conclusion, there are many unknown factors during the Covid 19 crisis which rely on The Government to clarify. Restarting the economy may require significant change to current policies including those used in the planning process.

We will work with the LPA as this situation moves forward and advise accordingly the potential impact this may have on the provision of education in Fylde.

Yours Faithfully,

School Planning Team

Lancashire County Council

FAO Planning Policy Team
Fylde Council

By Email: planningpolicy@fylde.gov.uk

Date: 02nd July 2020

99 Gresham Street
London

EC2V 7NG

Tel: 07920184637

Email: ari.akinyemi@property.nhs.uk

Twitter: @NHSPProperty

www.property.nhs.uk

Dear Sir/Madam,

Fylde Council - Five Year Housing Land Supply Draft Annual Position Statement

Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS).

Foreword

NHS Property Services is actively working with our customers regarding the recent cases of coronavirus (COVID-19) and are currently assessing vacant or underused space across our portfolio to identify space that could be repurposed for the provision of clinical beds.

In the interests of continuing to support the NHS in the longer term, however, we are keen to continue 'business as usual' activity where possible, and are supporting our customers in the management of their buildings and wider portfolios, to ensure the most efficient and effective use of NHS space. NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

Overview

NHS Property Strategy teams support Clinical Commissioning Groups (CCGs) and Sustainability and Transformation Plan (STP) groups to consider ways the local health and public estate can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with the integrated approaches set out within NHS Health Estate Plans. NHSPS work to ensure planning policies support this, both from a development and funding perspective.

Our Representation

The five-year housing land supply draft annual position statement document states that:

'Local planning authorities will need to engage with developers and others who have an impact on delivery.

This will include:

- *small and large developers;*
- *land promoters;*
- *private and public landowners;*
- *infrastructure providers (such as utility providers, highways, etc) and other public bodies (such as Homes England);*

- *upper tier authorities (county councils) in two-tier areas;*
- *neighbouring authorities with adjoining or cross-boundary sites; and*
- *any other bodies with an interest in particular sites identified'*

Where the statement above includes public landowners, NHSPS would like to put forward a response to support in principle the local planning authority's engagement with public landowners, such as NHSPS.

NHSPS is obliged by MHCLG to deliver more housing. We also have a statutory duty to help finance improved healthcare services and facilities nationally through the disposal of our sites.

An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by planning policies, particularly for providing alternative uses (principally housing).

Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses) and should not be subject to restrictive policies.

Furthermore, the Government's Public Land for Housing Programme, expressly encouraged the identification and release of surplus central Government land in England for 160,000 new homes by the end of March 2020. All land-owning Government departments including the NHS and their ALBs are within scope of the programme. Hence the Council should be ready to engage with NHSPS should we deem, according to our estate strategy, that we have surplus land that can deliver housing in terms of small site completions.

It should also be noted that the NHS, Councils and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across boroughs such as the household growth projections provided in Table 1 of the draft APS document. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and Community Infrastructure Levy (CIL) contributions to mitigate the impacts of growth and help deliver transformation plans. Healthcare facilities are essential infrastructure and where new or improved facilities are required; they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The authority should continue to work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new housing growth is sustainable.

We are constantly reviewing our sites, and we would support further engagement with the Council on this matter as part of their APS preparation.

Summary

All NHS organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

Should any part of our sites within the Fylde Council administrative area need to be reconfigured or declared surplus to operational healthcare requirements, we believe such sites should be considered suitable for alternative uses, including new residential development, depending on healthcare commissioning needs.

NHSPS would welcome any further discussion on these matters. We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me.

Kind regards,

Ari Akinyemi
Town Planner – NHS Property Services Ltd

Eddie Graves

From: Vicki.Enston@onr.gov.uk
Sent: 07 July 2020 16:02
To: PlanningPolicy
Subject: OC/ISP/10/01013 - Five Year Housing Land Supply Draft Annual Position Statement.
Attachments: scan_aflynn_20200701_0492_001.pdf; HPE CM: Changes to ONR Land Use Planning consultation zones

Good morning

Apologies for the delay in responding to the attached letter dated 23rd June 2020.

Please note that ONR's land use planning processes published at <http://www.onr.org.uk/land-use-planning.htm> may apply to some of the developments within the Five Year Housing Land Supply Draft Annual Position Statement for Fylde council. In order for ONR to have no objections to such developments we will require:

- confirmation from Lancashire County Council emergency planners that developments can be accommodated within any emergency plan for the Springfield site required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Also please see the attached email which includes details of a letter sent to all local authority planning departments regarding forthcoming changes ONR is to make to our consultation zones.

Kind regards

Vicki

Vicki Enston
Regulatory Officer
Land Use Planning
Emergency Preparedness & Response



E: ONR-Land.Use-Planning@onr.gov.uk

The Office for Nuclear Regulation's mission is to provide efficient and effective regulation of the nuclear industry, holding it to account on behalf of the public.

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Please visit the HSE website at the following address to keep yourself up to date

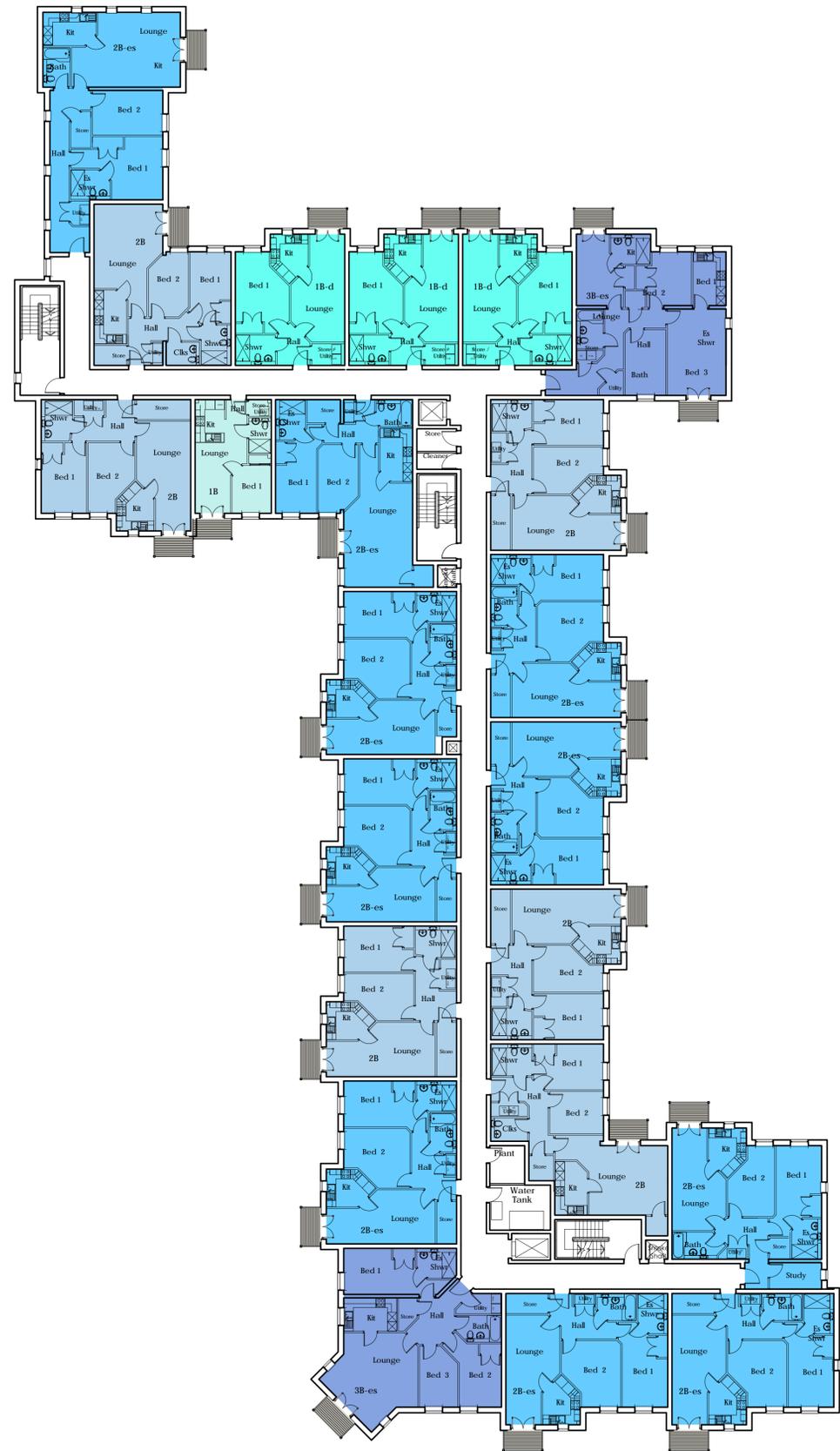
www.hse.gov.uk

Appendix 4

HS14 AXA Lytham approved plans

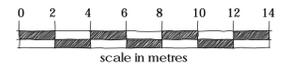


Ground Floor
FFL 5.800



First Floor
FFL 8.650

- 65 APARTMENTS TOTAL
- 3 1B APARTMENT
 - 9 1B APARTMENT Deluxe
 - 16 2B APARTMENT
 - 28 2B APARTMENT En-suite
 - 9 3B APARTMENT En-suite
 - COMMUNAL SPACES
 - Balcony



1:200

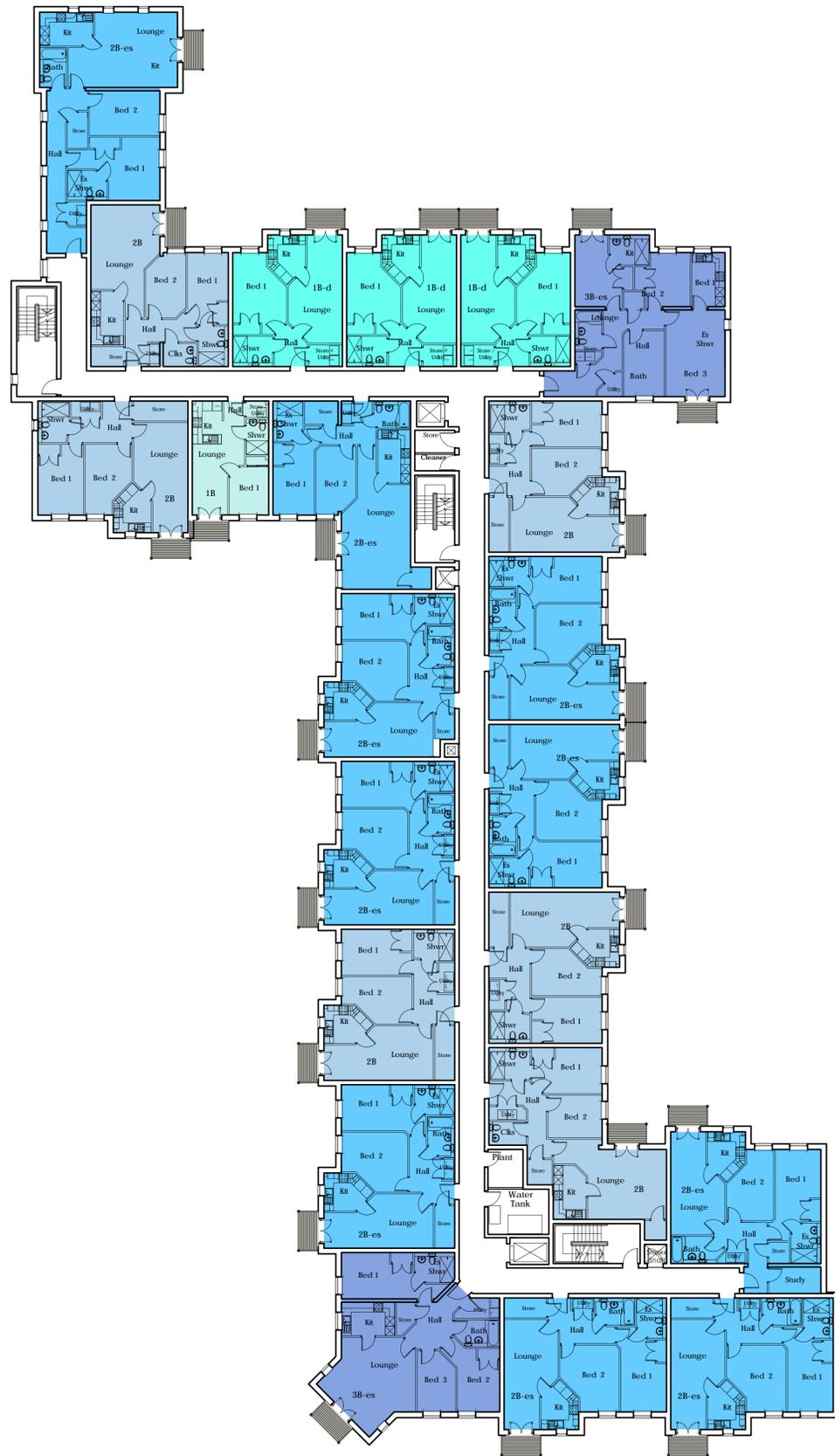
ALL DIMENSIONS TO BE CHECKED ON SITE
DO NOT SCALE THIS DRAWING - WORK TO FIGURED DIMENSIONS ONLY
REPORT DISCREPANCIES TO THE ARCHITECT AT ONCE BEFORE PROCEEDING
COPYRIGHT ACT APPLIES



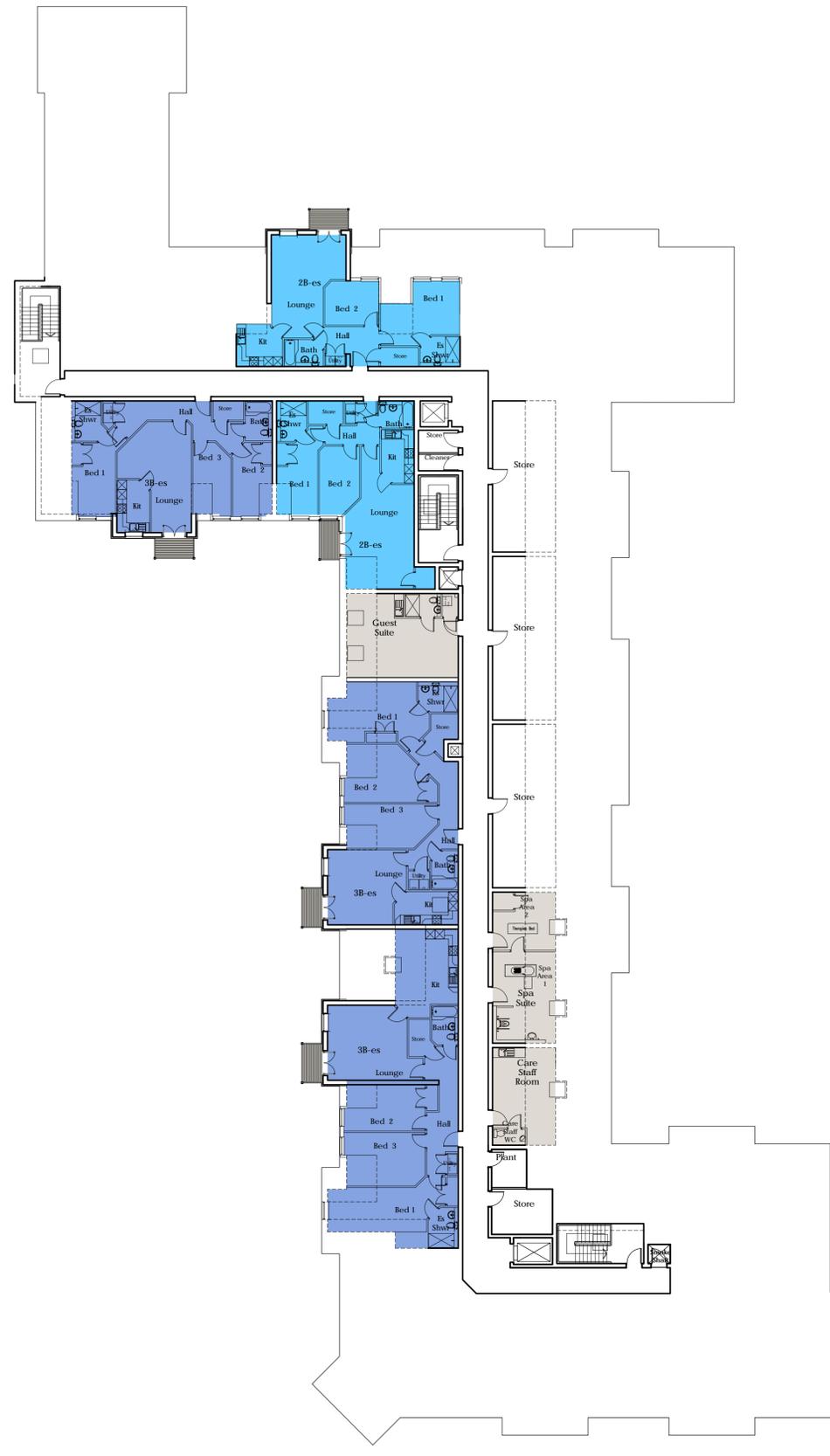
Project Title
**Land off Wharf Street
LYTHAM**

Drawing Title
**FLOOR PLANS 1
General Arrangement**

Date **Aug 2017** Scale **1:200@A1** Drawn **BRJ**
Drawing Number **09992-P1-121** Rev *****



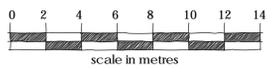
Second Floor
FFL 11.500



Third Floor
FFL 14.350

65 APARTMENTS TOTAL

- 3 1B APARTMENT
- 9 1B APARTMENT Deluxe
- 16 2B APARTMENT
- 28 2B APARTMENT En-suite
- 9 3B APARTMENT En-suite
- COMMUNAL SPACES
- Balcony



scale in metres
1:200

ALL DIMENSIONS TO BE CHECKED ON SITE
DO NOT SCALE THIS DRAWING - WORK TO FIXED DIMENSIONS ONLY
REPORT DISCREPANCIES TO THE ARCHITECT AT ONCE BEFORE PROCEEDING
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Project Title
**Land off Wharf Street
LYTHAM**

Drawing Title
**FLOOR PLANS 2
General Arrangement**

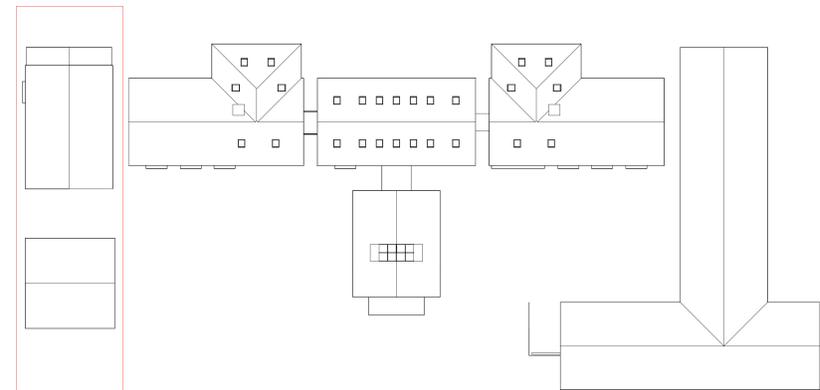
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Drawing Number **09992-P1-122** Rev *****

Appendix 5

HS60 Valentine Kennels plans resolved to approve



1 GF Block 1 Plan
 1 : 100



2 Plan Key
 1 : 500

STATUS:
PLANNING APPLICATION

ARCHITECTS
 PROJECT MANAGERS
 INTERIOR DESIGNERS
 ENVIRONMENTAL CONSULTANTS
 HEALTH & SAFETY MANAGERS
 HISTORIC BUILDING CONSULTANTS

NJSR

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 MANCHESTER | t: 0161 873 8770 | f: 0161 873 8771 | e: manchester@njsr.co.uk
 WWW.NJSR.CO.UK | WWW.NJSRPROJECTSERVICES.CO.UK

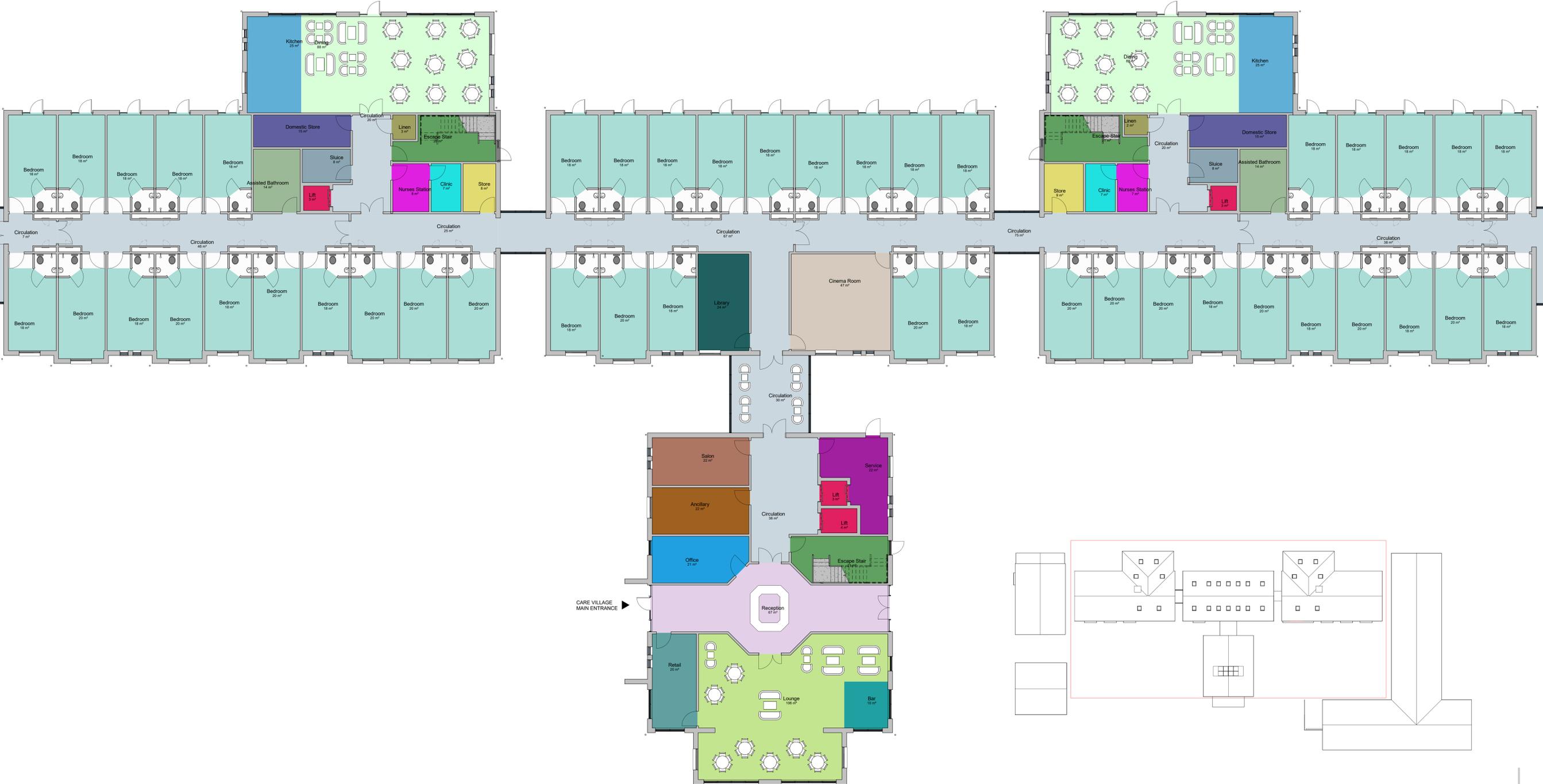


Client
 Proposed Care Home
 Lytham

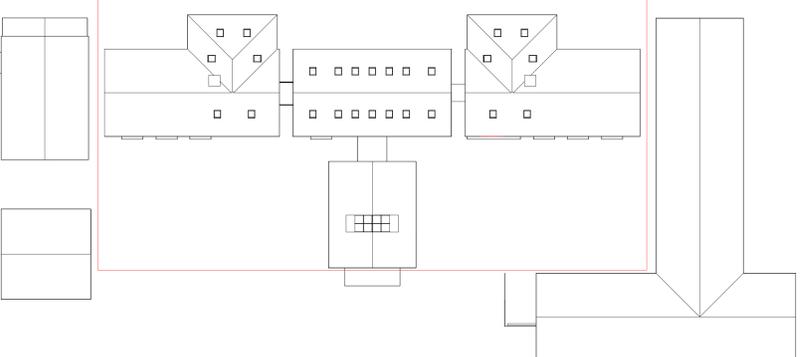
Title
 Proposed Ground Floor
 Sheet 1

Scale	Date	Drawn	Checked
As indicated	07/29/19mj	rb	rb

Contract	Dep. No.	Rev
1301.026	A131	



2 Plan Key
1 : 500



1 GF Block 2 Plan
1 : 100



STATUS:
PLANNING APPLICATION

ARCHITECTS
PROJECT MANAGERS
INTERIOR DESIGNERS
CLIMATE CONSULTANTS
HEALTH & SAFETY MANAGERS
HISTORIC BUILDING CONSULTANTS

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Client

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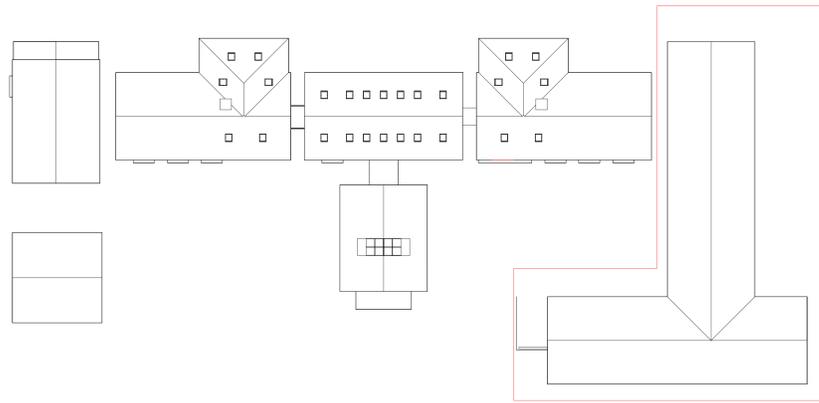
Project
**Proposed Care Home
Lytham**

Title
**Proposed Ground Floor
Sheet 2**

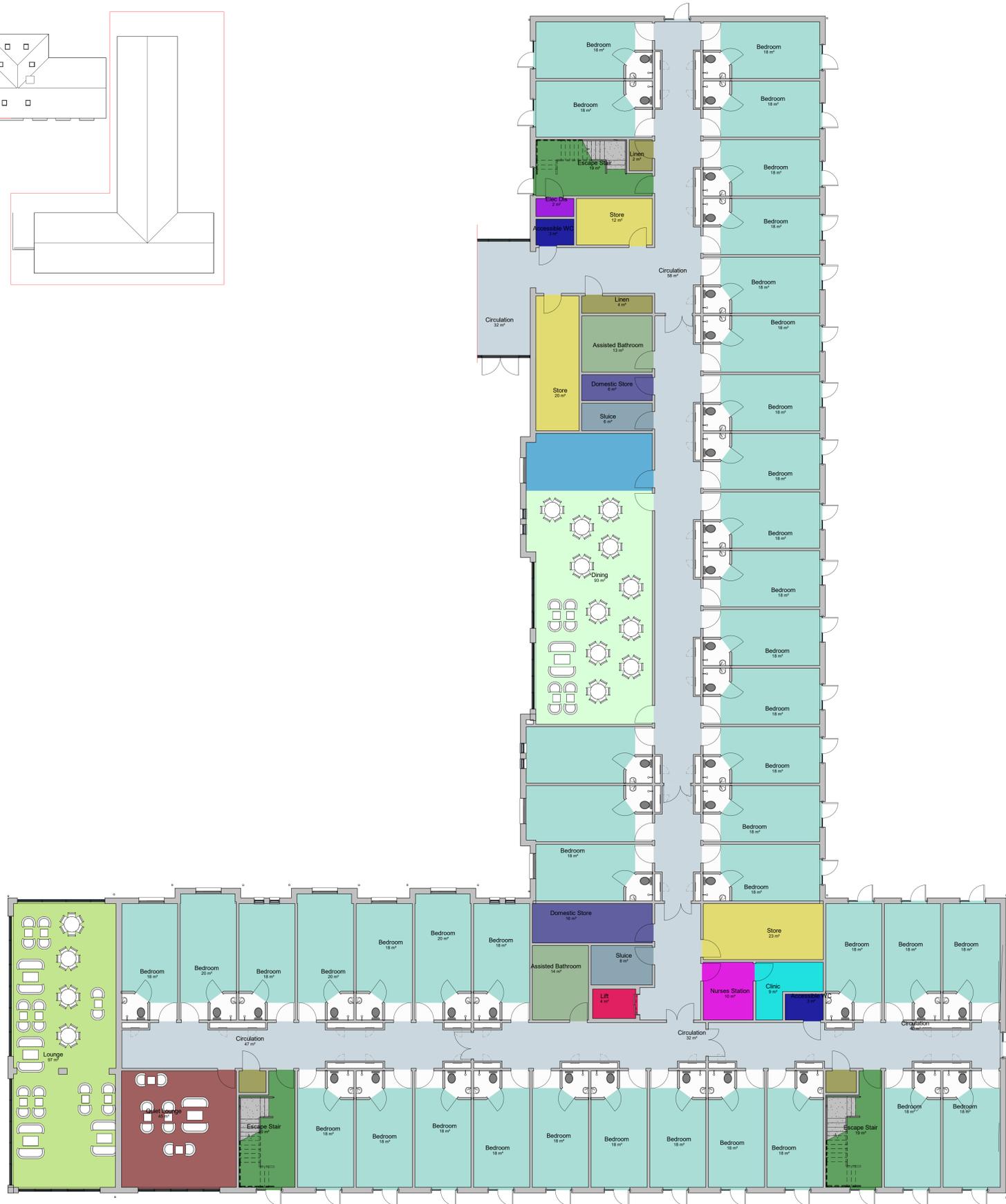
Scale	Date	Drawn	Checked
As indicated	07/29/19mj	rb	rb

Contract	Draw No.	Rev
1301.026	A132	

REVISION	DATE	DESCRIPTION	DRAWN	CHECKED



1 Plan Key
1 : 500



2 GF Block 3 Plan
1 : 100



STATUS:
PLANNING APPLICATION

ARCHITECTS
 PROJECT MANAGERS
 RISK MANAGERS
 ENVIRONMENTAL CONSULTANTS
 HEALTH & SAFETY MANAGERS
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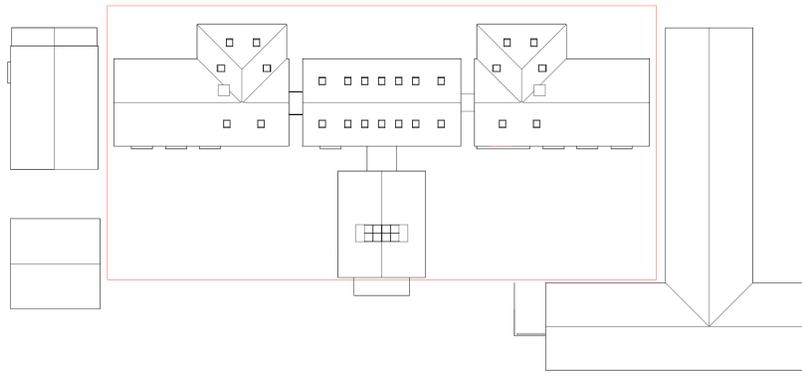
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Project
**Proposed Care Home
 Lytham**

Title
**Proposed Ground Floor
 Sheet 3**

Scale	Date	Drawn	Checked
As indicated	07/29/19mj	rb	rb
Contract	Draw No.	Rev	
1301.026	A133		



1 FF Block 2 Plan
1 : 100

2 Plan Key
1 : 500

STATUS:
PLANNING APPLICATION

ARCHITECTS
 PROJECT MANAGERS
 INTERIOR DESIGNERS
 CIVIL ENGINEERS
 HEALTH & SAFETY MANAGERS
 HISTORIC BUILDING CONSULTANTS

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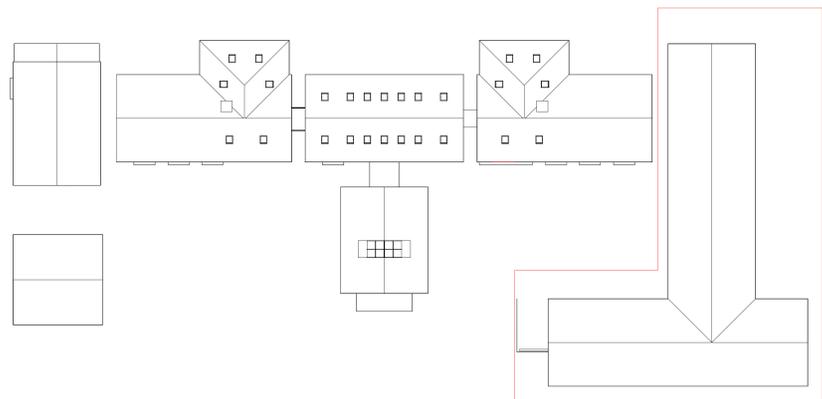


Project
**Proposed Care Home
 Lytham**

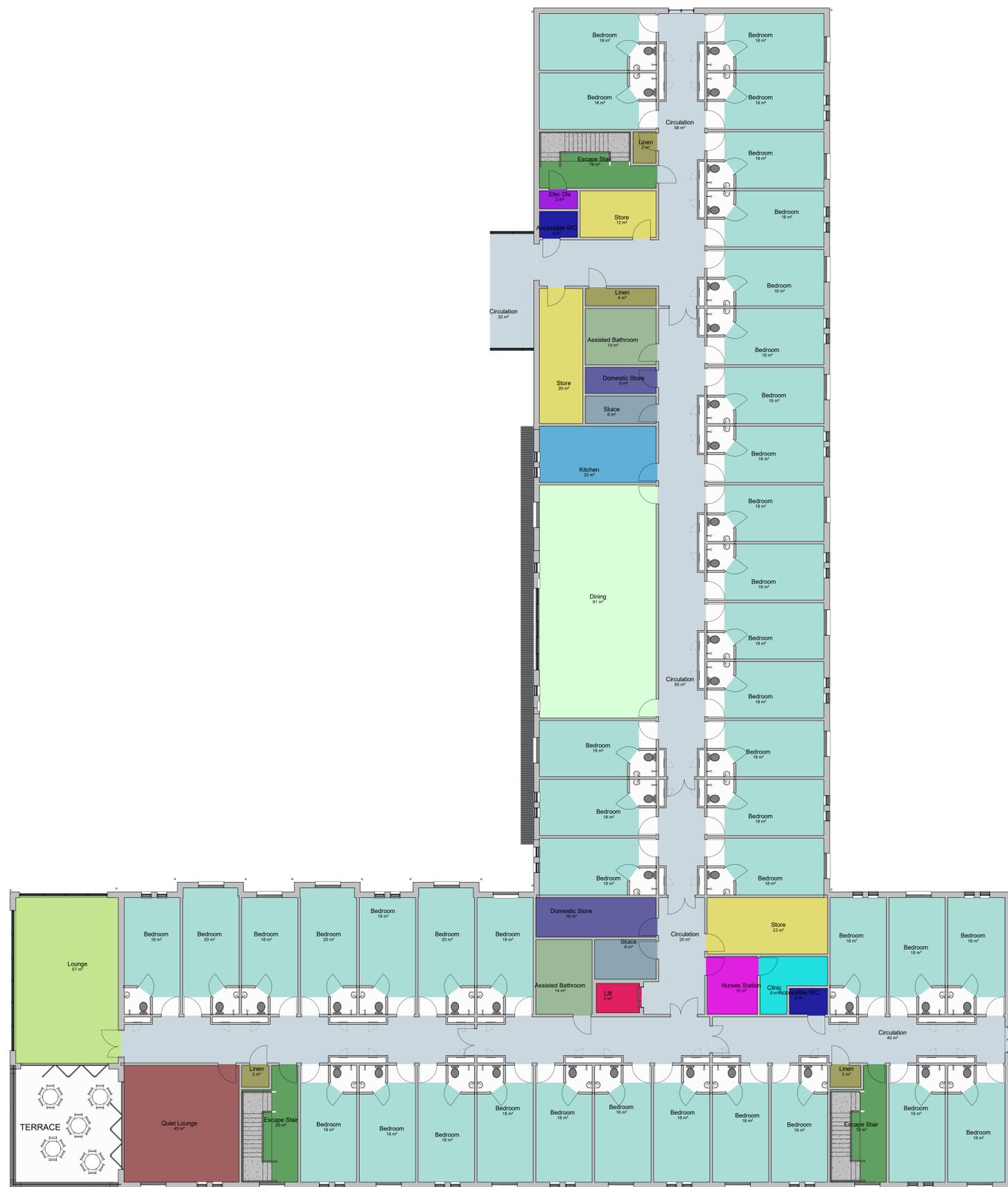
Title
Proposed First Floor Sheet 2

Scale	Date	Drawn	Checked
As indicated	07/29/19MJ	RB	
Contract	Dep. No.		Rev
1301.026	A135		

REVISION	DATE	DESCRIPTION	DRAWN	CHECKED



2 Plan Key
1 : 500



1 FF Block 3 Plan
1 : 100



STATUS:
PLANNING APPLICATION

ARCHITECTS: NJSR
 PROJECT MANAGERS: NJSR
 CIVIL CONSULTANTS: NJSR
 HEALTH & SAFETY MANAGERS: NJSR
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Project:
Proposed Care Home Lytham

Title:
Proposed First Floor Sheet 3

Scale	Date	Drawn	Checked
As indicated	07/29/19MJ	RB	RB
Contract	Dep. No.	Rev	
1301.026	A136		

Appendix 6

East Northants v SSHCLG and Lourett Developments Ltd Consent Order

IN THE HIGH COURT OF JUSTICE

Claim No. CO/917/2020

QUEEN'S BENCH DIVISION

PLANNING COURT

BETWEEN

EAST NORTHAMPTONSHIRE COUNCIL

Claimant

-and-

SECRETARY OF STATE FOR HOUSING COMMUNITIES AND LOCAL GOVERNMENT

Defendant

- and -

LOURETT DEVELOPMENTS LTD

Interested Party



=====

CONSENT ORDER

=====

UPON the parties agreeing to the terms hereof

BY CONSENT IT IS ORDERED THAT:

1. Permission is granted and the decisions of the Defendant, dated 24 January 2020 and carrying reference number APP/G2815/W/193232099, to allow the Interested Party's appeal under s.78

of the Town and Country Planning Act 1990, and to make a partial award of costs in favour of the Interested Party, are quashed pursuant to s.288 of the same Act.

2. The appeal is remitted to be determined de novo.

3. The Defendant pay the Claimant's costs in the amount of £8616.66

Dated: This 7th Day of May 2020

PARTICULARS

- A. These proceedings concern an application brought under section 288 of the 1990 Act by the Claimant against (1) the decision of the Defendant to allow the Interested Party's appeal against the decision of the Claimant to refuse planning permission for residential development at land to the west of numbers 7-12 The Willows, Thrapston, NN14 4LY and (2) the decision to make a partial award of costs against the Claimant in respect of that appeal.

- B. The Defendant has carefully considered the Inspector's decision and the Claimant's Statement of Facts and Grounds and Reply, and the evidence served in support. He concedes that he erred in his interpretation of the definition of deliverable within the glossary of the National Planning Policy Framework ("NPPF") as a 'closed list'. It is not. The proper interpretation of the definition is that any site which can be shown to be 'available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available.

- C. The Defendant therefore considers that it is appropriate for the Court to make an Order quashing the decisions and remitting the appeal to be determined de novo.

- D. The Interested Party agrees that the decisions should be quashed and the appeal remitted to be determined de novo.



Paul Bland
Head of Planning Services

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Appendix 7

Quashed appeal decision The Willows Thrapston



Appeal Decision

Hearing Held on 8 January 2020

Site visit made on 8 January 2020

by Graham Chamberlain, BA (Hons), MSc, MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24th January 2020

Appeal Ref: APP/G2815/W/19/3232099

Land rear of 7 - 12 The Willows, Thrapston, Northamptonshire, NN14 4LY

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Lourett Developments Ltd. against the decision of East Northamptonshire District Council.
 - The application Ref: 18/02459/OUT, dated 19 December 2018 was refused by notice dated 28 February 2018.
 - The development proposed is residential development to erect four dwellings.
-

Decision

1. The appeal is allowed, and planning permission is granted for a residential development to erect four dwellings at Land rear of 7 - 12 The Willows, Thrapston, Northamptonshire, NN14 4LY in accordance with the terms of the application, Ref: 18/02459/OUT dated 19 December 2018, subject to the conditions set out in the attached schedule.

Preliminary Matters

2. The planning application was submitted in outline with all matters of detail reserved for future consideration save for 'access' and 'scale'. Drawings have been submitted with the application detailing the width and depth of each of the proposed dwellings. However, the appellant confirmed at the hearing that these should only be treated as presenting the potential maximum depth and width of the individual dwellings. This is because 'appearance' is a reserved matter and therefore the final form and size of the individual dwellings may be less than set out on the plans. I have considered the appeal on this basis.
3. Drawings have not been submitted confirming what the height of the proposed dwellings would be¹ and there is no reference to numeric dimensions in the submissions. The only reference is an indication that the dwellings could be two to three storeys. This is imprecise as there can be significant deviations in storey heights. The appellant therefore confirmed that 'scale', in so far as it relates to height, is not a matter before me. I have accepted this point and considered the proposal on this basis as it is possible to advance some aspects of a reserved matter for consideration but not others. For example, the access to a site may be advanced for assessment in an application but not the access within it, such as circulation routes.

¹ The drawings in Appendix 27 of the appellant's statement are indicative and thus not a firm proposal

4. The appellant originally signed Certificate A on the application form thereby confirming Lourett Development Ltd as the sole owner of the appeal site. It transpired that this was incorrect because there are two other freeholders. To address this, the appellant served notice on the freeholders and completed Certificate B. The appellant has therefore discharged the obligations imposed by The Town and Country Planning (Development Management Procedure) Order 2015 relating to the notice of planning permission.
5. During the hearing the Council produced late evidence (listed at the end of this decision). It was not extensive or overly technical and was capable of being dealt with by those present following a short adjournment. Accordingly, no party was significantly prejudiced when I accepted it. In addition, I requested the submission of evidence relating to the effect of the proposal on the Upper Nene Valley Gravel Pits Special Protection Area. I adjourned the hearing to enable me to consider this information, which was extensive, and consult Natural England. The hearing was subsequently closed in writing.
6. Applications for awards of costs were made by Lourett Developments Ltd against East Northamptonshire District Council and by East Northamptonshire District Council against Lourett Developments Ltd. These applications are the subject of separate Decisions.

Main Issues

7. The appeal was submitted with additional survey evidence relating to breeding birds and great crested newts. These details had originally been recommended as being necessary in the appellant's preliminary ecological appraisal and the absence of them had resulted in the Council's fourth reason for refusal. The Council's ecologist has reviewed the additional evidence and is content that it demonstrates protected species are unlikely to be present in the site and thus effected by the proposal. The Council has therefore withdrawn the fourth reason for refusal. I have no substantive evidence before me disputing the expert views of the ecologists advising the Council and appellant. Accordingly, this matter has been appropriately addressed by the additional evidence and therefore it is unnecessary for me to consider it further.
8. During the hearing the Council, Town Council and local residents confirmed that the developers of the Willows had originally intended to provide a public open space at the appeal site. However, due to the specific drafting of the planning obligation and a lack of monitoring, this never came to fruition. The appeal site is currently fenced off with no public access provided. The Council confirmed that there is no means of securing the appeal site as a public open space and therefore the enforcement investigation considering this matter was closed.
9. The Council accepted at the hearing that the appeal site has never been a public open space, that any public access to date has been informal and at the discretion of the landowner and there is no legal obligation on the appellant to provide public access. In the absence of such access, the appeal site cannot provide the public with important opportunities for sport and recreation and therefore cannot be considered an open space as defined in the National Planning Policy Framework (the 'Framework'), regardless of whether it offers a visual amenity. It therefore follows that the proposal would not result in the loss of open space. As such, the Council withdrew its fifth reason for refusal. Given what I heard at the hearing, I consider this was an appropriate course of action and therefore I have not considered this further.

10. Given the forgoing, the main issues in this appeal are:

- Whether the proposed development would be in a suitable location with reference to the relevant development plan policies concerned with the location of housing;
- Whether the proposed development would provide an appropriate mix of dwellings, including whether it would amount to an efficient use of land;
- The effect of the proposed development on the character and appearance of the area; and
- If there is a conflict with the development plan, whether there are other material considerations that indicate a decision should be taken other than in accordance with the development plan.

Reasons

Whether the proposed development would be in a suitable location with reference to development plan policies

11. In order to provide a planned approach to the location and extent of development that meets needs as locally as possible, Policy 11 of the North Northamptonshire Joint Core Strategy 2011 – 2031 (JCS) provides an overarching spatial strategy for the plan area. The broad aim is to direct development to urban and rural areas in a locally appropriate way.
12. Policy 11b) of the JCS refers to Market Towns such as Thrapston² and states that they will provide a strong service role for their local communities with growth in homes and jobs at an appropriate scale. Policy 11b) of the JCS should be read alongside the Rural North, Oundle and Thrapston Plan (RNOTP), which identifies several development sites for Thrapston. It also includes Policy 2, which permits windfall development within the defined settlement boundary of the town subject to criteria. The strategy in these policies makes no explicit provision for unallocated windfall development on the edge of Market Towns. The emerging Local Plan currently includes a specific policy dealing with windfall development on the edge of towns, but this is not at a stage of preparation where it can be afforded more than very limited weight.
13. Different criteria within Policy 11 of the JCS apply depending on whether a site is within an urban or rural area. However, the policy does not set out how the urban and rural areas should be differentiated and defined. For example, there is no reference in the policy to settlement boundaries as the means of doing this. Planning judgment is therefore required in the absence of any definition. A useful starting point in making this judgment is the settlement boundary placed around Thrapston in the RNOTP. This was identified following a rational assessment based on the criteria set out in Paragraph 4.5 of the plan.
14. Land on the periphery of towns has only been included in the settlement boundary where it is clearly distinct from the countryside. To this end the appeal site is not included in the settlement boundary of Thrapston, correctly in my view, because it has a rural appearance that provides a visual affinity with the river corridor. It is also beyond the rear elevations of the properties in The Willows, which functions as a discernible natural boundary of the town. As

² The Council erroneously referred to Policy 11a) in its reason for refusal, which relates to Growth Towns

such, the appeal site is in the open countryside, a finding supported by the appellant's Landscape and Visual Impact Assessment.

15. Given the foregoing finding that the appeal site is not within the urban area of Thrapston, the appeal site cannot be the type of windfall development supported by Policy 2 of the RNOTP and therefore it gains no support from that policy. Instead, the proposal falls to be considered against The Rural Areas criteria in Policy 11. To this end, no substantive evidence has been provided to demonstrate the proposal is required to support the rural economy or to meet a local need. It is not a rural diversification or the reuse of rural buildings. Moreover, the proposal would not represent the type of infilling permitted by Policy 11b, which relates to villages. Permitting infilling on the edge of towns would be to stretch the interpretation of the policy beyond what it says.
16. Policy 11d) states that other forms of development (those not referred to in the policy) will be resisted in the open countryside unless there are special circumstances as set out in Policy 13 of the JCS or national policy. There is nothing before me to suggest such special circumstances exist. Accordingly, the proposal would not be any of the types of development permitted by Policy 11 in the rural areas. The negative corollary being that the proposal is at odds with Policy 11 of the JCS.
17. In conclusion, the proposed development would not be in a suitable location when considering the relevant development plan policies concerned with the location of housing. As such, it would harmfully undermine the adopted spatial strategy and the consistency and relative certainty that should flow from a planned approach to the location of new development.

Whether the proposed development would provide an appropriate mix of dwellings

18. The 2015 Strategic Housing Market Assessment (SHMA) informed the JCS and demonstrated that the need in the market sector is for predominately smaller dwellings. It forecast that around 70% of new households would need 1-2-bedroom homes, 30% 3-bedroom and very few 4 or more. However, Paragraph 9.26 of the JCS recognises that it may not be advantageous to secure all housing as 1-3-bedroom properties and therefore it seeks to address the aspiration for additional bedrooms. To this end, the JCS indicates that a significant proportion of new homes (generally 70%) should be 1-3-bedroom properties with the remainder being larger, with proposals advocating a higher proportion of larger homes needing to be justified with evidence.
19. The above is encapsulated in Policy 30 of the JCS. It places an emphasis on the provision of small and medium sized dwellings, defined as properties with 1-3 bedrooms. This approach has regard to the findings of the SHMA whilst also allowing flexibility to provide larger aspirational homes. Policy 30 does not explicitly state that proposals should be refused if they fail to place an emphasis on smaller properties, but such a policy would not be positively prepared. There is a negative corollary that a mix at odds with that in Policy 30 will be at odds with the policy itself.
20. The Council has not suggested what an appropriate housing mix at the appeal site would be, but even in the absence of this clarification the appellant's initial suggestion that the proposal should provide four larger homes (4+ bedrooms) would clearly be contrary to Policy 30, as it would not place an emphasis on smaller homes (1-3-bedroom properties).

21. The appellant's justification behind the mix was not persuasive, advocating, without substantive evidence, that viability may be affected if smaller homes were proposed. However, as scale (in so far as it relates to height) and appearance are not before me the appellant convincingly argued at the hearing that the housing mix could be addressed at the reserved matters stage. For example, the proposal could entirely comprise of bungalows.
22. That said, even if bungalows were proposed the depth and width set out on the drawings would allow the dwellings to be larger three-bedroom properties or four-bedroom homes³. It is highly unlikely that any would be limited to 1 or 2 bedrooms given the likely floor area. That said, Policy 30 does not entirely rule out larger homes and it only defines smaller properties with reference to bedroom size and not floor area. Therefore, a mix with an emphasis on three-bedroom properties, even larger ones, alongside the provision of a four-bedroom home, need not be at odds with Policy 30.
23. Although not explicitly referred to in its second reason for refusal, the Council sought to develop an argument that the proposal would be an inefficient use of land because four large properties are proposed instead of a greater number of smaller homes. There is some traction to this argument because more homes could be provided within the built envelope of what is proposed, and little evidence has been submitted to suggest the access could not be delivered to an adoptable standard, thereby enabling more than four homes to be served off it. Even if it could not, the Highway Authority's indicative standard is for five homes to be served off a private drive. This could leave scope to increase the number of homes by at least one.
24. However, the access into the site would closely pass between the flank elevations of two homes. This would result in noise and disturbance to the occupants of these properties from passing traffic. On balance, I share the view of the Council that the activity from four homes would not be unreasonable. However, increasing the number of homes, even by one, would increase the impact and begin to tip the balance towards an unreasonable effect.
25. Moreover, the appeal site is on the edge of the town, where a tapering into the countryside can be advantageous to the character and appearance of the area. A lower site coverage and density can allow more opportunities for larger plots and gardens, and thus extra soft landscaping. This would provide a more sensitive and gentle transition from the urban area to the rural fringe. Accordingly, it seems to me that the number of homes proposed is about right to ensure the living conditions of neighbours are not unreasonably affected and the rural fringe character of the area respected. Consequently, the proposal would be an efficient use of land given the specific site constraints.
26. In conclusion, the proposal need not inherently result in a housing mix of larger properties. Instead, it would be possible to provide a mix that places an emphasis on smaller properties, thereby adhering to Policy 30 of the JCS.

The effect on the character and appearance of the area

27. The Willows is a small housing estate broadly characterised by repeated house types that are generally detached with driveways and garages and arranged within a conventional highway layout and design. This results in a suburban

³ The floorplans indicate the homes could have ground floors of around 86sqm-113sqm

- appearance, which is further reinforced by the position of the properties in diminutive clusters that branch off the main carriageway. The pattern of development is therefore one of small cul-de-sacs. The appeal scheme would broadly continue this arrangement, as it would amount to a small cluster of homes in a cul-de-sac accessed off the main carriageway. In this respect it would not jar with the overriding pattern of development in The Willows.
28. That said, the appeal scheme would be positioned in a 'back land' location as it would be behind Nos 7 - 12 The Willows. However, the houses need not appear discordant or unduly prominent from The Willows if their height (which is a reserved matter) is no greater than Nos 7-12 The Willows. This is because the existing properties would largely screen the new homes in views from The Willows thereby limiting their street presence.
29. Plot 2 would be the most prominent in views from The Willows, but it could be designed to appropriately punctuate the vista that would be created along the access drive. The indicative layout demonstrates that a feature cluster of trees, and landscaped front gardens, could also be used to further soften views.
30. The properties would have a similar depth to nearby houses but their width, particularly Plots 1 and 4, would be greater. Nevertheless, the homes could be articulated in the final design to lessen the impact of the massing. In addition, the proposed dwellings could also have similar finishing materials to nearby properties which would facilitate a complementary appearance that would integrate the dwellings into the street scene.
31. The appellant's LVIA demonstrates that the appeal scheme would have a limited visual envelope and therefore the urbanisation of the appeal site would have little visual impact beyond the immediate context of the site, thereby broadly preserving the wider landscape. Existing soft landscaping along the western boundary of the site would screen much of the development from the river corridor. The houses would be visible from the south/south west, but they would be viewed against the backdrop of housing in The Willows and Sedge Close. The development would not, therefore, appear as a discordant or unnatural incursion into the countryside. Moreover, there would be space along the southern boundary for a thick row of planting to provide further visual containment that would complement the existing planting along the western boundary of the site.
32. In conclusion, the proposal, subject to an appropriate reserved matters submission, would not inherently harm the character and appearance of the area and therefore a conflict with Policy 8 of the JCS, which seeks to secure development that responds to a site's context, need not occur.

Other Considerations

33. Paragraph 73 of the National Planning Policy Framework (the 'Framework') states that a local planning authority should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The JCS sets out the Council's housing requirement which, with a five percent buffer⁴, equates to 2205 homes over the five-year period (1 April 2019 to 31 March 2024). This is an annual requirement of 441 homes.

⁴ As required by Paragraph 73 of the Framework

34. The Framework defines what constitutes a 'deliverable' site for the purposes of a five-year housing land supply assessment. Category A sites in the definition are all minor sites with planning permission as well as all major sites with full planning permission. The second part of the definition sets out a list of certain types of site that can be considered deliverable if there is clear evidence that housing completions will begin within five years. The onus is on the Council to provide that evidence. These are sites with outline planning permission for major development, sites allocated in a development plan, sites with permission in principle or sites identified on a brownfield register.
35. The Council has recently published an Annual Position Statement approved by its Planning Policy Committee that suggests the housing supply over the relevant period is 2660 homes. This would amount to a 6.03-year supply⁵ against the housing requirement. The appellant has reviewed this and is of the view that the supply is nearer to 1269 homes, which is around 2.88 years.
36. Much of the discrepancy can be put down to the Council not adhering to the definition of what constitutes a deliverable site in the Framework. The Council has included sites allocated in the emerging Local Plan (around 549 homes) and unallocated unapproved development schemes that are likely to come forward on previously developed land in urban areas, two of which were discounted by the Council from the brownfield register⁶ (around 225 homes). This is a significantly flawed approach as the definition of 'deliverable' in the Framework is a closed list⁷. As such, at least 774 homes can immediately be removed from the Council's housing land supply. This alone means the Council is unable to demonstrate a five-year housing land supply, the supply being in the region of 4.28 years⁸.
37. During the hearing I heard evidence on the deliverability of some of the Category B sites (those with outline permission or allocated in the development plan) relied upon by the Council to demonstrate a five-year housing land supply. However, as will be apparent, it is enough to work with the 4.28-year figure for the purposes of my assessment.
38. Paragraph 11 of the Framework states that in situations where a Council cannot demonstrate a five-year housing land supply, permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
39. In this instance, the conflict with Policy 11 of the JCS would be the only adverse impact of the proposal. Policy 11 is a strategic policy that is broadly consistent with several of the Framework's aims, such as the promotion of sustainable transport, recognising the intrinsic character and beauty of the countryside and delivering a genuinely plan led planning system, which can include land use designations. In this instance, the land use designations being urban and rural areas, which are used as a means of guiding the location and quantum of development to maximise its benefits and minimise its impacts.
40. However, a rigorous application of Policy 11 of the JCS would frustrate attempts to address the Council's current housing deficit. Settlements such as

⁵ 2660/441

⁶ Former Abbott House residential Home and Gells, 35 High Street – together these sites account for 14 homes

⁷ The appellant has referred to case law reinforcing this point

⁸ (2660-774)/441

Thrapston are well placed to accommodate additional homes given the services available, a point made in Policy 11 1b) of the JCS. In this respect, the appeal site, although outside the settlement boundary of Thrapston, and thus in a rural area, is very well connected to several facilities in the town centre.

41. Moreover, I have not been presented with substantive evidence to suggest the housing deficit can be remedied without releasing land outside settlement boundaries. If sites in the rural area must be released, then the appeal site is a good candidate given the absence of technical harm in respect of matter such as landscape impact, highway safety and flood risk. In the circumstances, the conflict with Policy 11 of the JCS is of moderate weight.
42. When considering the benefits of the appeal scheme, the proposal would provide some modest support to the construction industry and to the local economy through the subsequent spend of future occupants. However, given the modest scale of the development these benefits would carry limited weight, particularly as I have seen nothing of substance to suggest the contribution from future residents would make a significant difference to the local economy or the vitality of the community.
43. Similarly, the small size of the development means the contribution to housing land supply would be modest. Nevertheless, this attracts moderate weight given the housing supply shortfall. Overall, the benefits of the proposal are cumulatively of moderate weight. Thus, the moderate adverse impact of the appeal scheme would not significantly and demonstrably outweigh the moderate benefits. This is a material consideration that indicates the proposal should be determined other than in accordance with the development plan.

Other Matters

44. I share the view of the Council and Local Highway Authority that the use of the access would not harm highway safety because it would have a suitable width with adequate visibility. The development can be designed at the reserved matters stage to deliver satisfactory levels of parking and an appropriate refuse strategy. Moreover, with layout and height being reserved matters there is scope to design a scheme that would not harm the outlook, level of light and privacy of the occupants in The Willows. I understand that a gas main passes through the site, and wires over it, but these are constraints for the developer to address with the owners and operators of this infrastructure. Land contamination can be addressed through planning conditions.
45. Reference has been made to the Council's emerging Local Plan Part 2, but this has not been subject to examination and is therefore open to potentially significant changes. As such, it has limited non determinative weight. The Flood Risk Assessment has demonstrated that the houses can be sited within Flood Zone 1 and therefore the sequential test is not required. Substantive evidence is not before me to suggest the proposal would harm the aims of the Nene Valley Nature Improvement Area.
46. The Upper Nene Valley Gravel Pits is designated as a Special Protection Area (SPA). The Conservation of Habitats and Species Regulations 2017 requires that where a plan or project is likely to result in a significant effect on a European site such as a SPA, and where the plan or project is not directly connected with or necessary to the management of the European site, as is the case here, a competent authority is required to make an Appropriate

Assessment of the implications of that plan or project on the integrity of the European site in view of its conservation objectives

47. The qualifying features underpinning the SPA designation is the concentration of Great Bittern, Gadwell and European golden plover. The conservation objectives for the SPA can be summarised as ensuring that the integrity of the site is maintained or restored as appropriate so that it continues to support the population and distribution of its qualifying features.
48. Natural England's (NE) supplementary advice on conserving and restoring the site features of the SPA⁹ identifies recreational disturbance as one of the principle threats to the birds. Research evidence referred to in the Council's Upper Nene Valley Gravel Pits SPA Supplementary Planning Document 2015 (SPD), undisputed by the appellant, supports this conclusion. As does NE's consultation response. The presence of people can disturb the birds and dog walking can be particularly problematic in this regard, especially if dogs are let off their lead.
49. The appeal scheme would facilitate a permanent increase in the number of people living within a 'zone of influence' around the SPA and thus within a short journey of it. The SPA is an interesting and attractive semi-natural area and is therefore somewhere the future residents of the proposed homes would likely wish to visit for recreation, thereby increasing the risk of harmful recreational pressure. This would provide a pathway of effect for recreational disturbance. Accordingly, and when following a precautionary approach, the proposal, in combination with other plans and projects, would be likely to have a significant effect on the SPA. There is no evidence before me to suggest the proposal would have any other effects on the SPA.
50. NE, as the Statutory Nature Conservation Body (and the Council) have referred to the SPD, which sets out a mitigation strategy. This involves developers providing an evidence based financial contribution per dwelling that is used for Strategic Access Management and Monitoring at the SPA, such as fencing, screening and wardens. Such management will minimise the risk of recreational disturbance upon the qualifying features.
51. The appellant has paid the financial contribution to the Council in line with the methodology in the SPD¹⁰. In the absence of a planning obligation there is no legal requirement upon the Council to spend the money in the way envisaged, but as a responsible public authority with a publicly stated position and strategy, I am satisfied that they will. The overall approach, and the level of the financial contribution, is supported by NE. Thus, with this mitigation the proposal would not adversely affect the integrity of the SPA, as its condition need not deteriorate as a result of the appeal scheme.

Conditions

52. I have had regard to the advice in the Planning Practice Guide and the conditions suggested by the Council. In the interests of certainty, it is necessary to secure details of the reserved matters and for the proposal to be implemented in accordance with them. In the interests of minimising the risk of flooding it is necessary to secure the implementation of the measures set out in the FRA. To safeguard living conditions, it is necessary to impose conditions

⁹ See Planning Practice Guide (PPG) Paragraph: 002 Reference ID: 65-002-20190722

¹⁰ A receipt has been provided as has a copy of the Habitats Mitigation Contribution Agreement

relating to land contamination and construction. In the interests of highway safety, it is necessary to secure parking and an appropriate surface treatment, pedestrian visibility splays, highway drainage and details of any gates.

53. As appearance and landscaping are reserved matters it is unnecessary to secure details of external materials, boundary treatment and levels. The burning of construction material can be dealt with through other legislation, with reference made to the Environmental Protection Act at the hearing. As such, a condition along these lines is not necessary to make the development acceptable.

Conclusion

54. The proposed development would not adhere to the development plan but material considerations, namely the Framework, indicate that the appeal should be determined other than in accordance with the development plan. Accordingly, the appeal has succeeded.

Graham Chamberlain
INSPECTOR

APPEARANCES

FOR THE APPELLANT

Brett Mosely	Appellant
Kilian Garvey	Kings Chambers
Andrew Grey	Atchinson Raffety
Neil Tiley	Pegasus Group

FOR THE LOCAL PLANNING AUTHORITY

Roz Johnson	East Northamptonshire DC
Michal Burton	East Northamptonshire DC
Dez Tanser	East Northamptonshire DC

INTEREST PARTIES

Peter Theakston	Local Resident
Chris Otterwell	Thrapston Town Council
Val Carter	Thrapston Town Council (and East Northamptonshire District Cllr)

DOCUMENTS SUBMITTED AT THE HEARING

By the Council

Doc 1 Appeal Decision APP/G2815/W/19/3230410
Doc 2 Appeal Decision APP/G2815/W/19/3235142
Doc 3 Council's Five-Year Housing Land Supply Update

By the Council upon my request

Doc 4 Comments from the Environment Agency (in full)
Doc 5 Plan of the Upper Nene Valley Gravel Pits SPA
Doc 6 Habitats Mitigation Contribution Agreement
Doc 7 Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document
Doc 8 Addendum to the SPA SPD: Mitigation Strategy
Doc 9 Natural England's consultation response to the Council

By Mr Theakston

Doc 10 Letter from Bramble Homes dated 14 April 2005 and accompanying plan

Schedule of Planning Conditions

1. Approval of the details of scale (in so far as it relates to height), layout, appearance and landscaping (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before the development is commenced.
2. Application for the approval of the reserved matters must be made not later than the expiration of three years beginning with the date of this permission.
3. The development to which this permission relates shall be begun before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
4. The development shall be carried out in accordance with the submitted flood risk assessment (FRA) (Ref: 120-FRA-01-C) dated October 2018 and the following mitigation measures it details:
 - Finished floor levels shall be set no lower than 30.83 metres above Ordnance Datum (AOD).

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

5. No demolition or construction work (including deliveries to or from the site) that causes noise to be audible outside the site boundary shall take place on the site outside the hours of 08:00 and 18:00 Mondays to Fridays and 08:00 and 13:00 on Saturdays, and at no times on Sundays or Bank Holidays unless otherwise agreed with the local planning authority.
6. During site clearance and construction phases the developer shall provide, maintain and use a supply of water and means of dispensing it, to dampen dust in order to minimise its emission from the development site. The developer shall not permit the processing or sweeping of any dust or dusty material without effectively treating it with water or other substance in order to minimise dust emission from the development site. The developer shall provide and use suitably covered skips and take other suitable measures in order to minimise dust emission to the atmosphere when materials and waste are removed from the development site
7. Prior to the commencement of piling operations, a scheme for the control and mitigation of noise, including vibration, affecting surrounding premises shall be submitted to, and approved in writing, by the local planning authority. Such measures shall operate throughout the piling operations in accordance with the approved details or amendments which have been submitted to and approved in writing by the Local Planning Authority.
8. The development hereby permitted shall not be commenced until details of a comprehensive contaminated land investigation has been submitted to and approved by the Local Planning Authority (LPA) and until the scope of works approved therein have been implemented where possible. The assessment shall include all of the following measures unless the LPA dispenses with any such requirements in writing:

a) A Phase I desk study carried out by a competent person to identify and evaluate all potential sources of contamination and the impacts on land and/or controlled waters, relevant to the site. The desk study shall establish a 'conceptual model' of the site and identify all plausible pollutant linkages. Furthermore, the assessment shall set objectives for intrusive site investigation works/ Quantitative Risk Assessment (or state if none required). Two full copies of the desk study and a non-technical summary shall be submitted to the LPA without delay upon completion.

b) A site investigation shall be carried out to fully and effectively characterise the nature and extent of any land contamination and/or pollution of controlled waters. It shall specifically include a risk assessment that adopts the Source-Pathway-Receptor principle and takes into account the sites existing status and proposed new use. Two full copies of the site investigation and findings shall be forwarded to the LPA.

This must be conducted in accordance with the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR11'.

9. Where the risk assessment identifies any unacceptable risk or risks, an appraisal of remedial options and proposal of the preferred option to deal with land contamination and/or pollution of controlled waters affecting the site shall be submitted to and approved by the LPA. No works, other than investigative works, shall be carried out on the site prior to receipt and written approval of the preferred remedial option by the LPA.

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model procedures for the Management of Land Contamination, CLR11'. Reason: To ensure the proposed remediation plan is appropriate.

10. Remediation of the site shall be carried out in accordance with the approved remedial option.
11. On completion of remediation, two copies of a closure report shall be submitted to the LPA. The report shall provide verification that the required works regarding contamination have been carried out in accordance with the approved Method Statement(s). Post remediation sampling and monitoring results shall be included in the closure report.
12. If, during development, contamination not previously considered is identified, then the LPA shall be notified immediately, and no further work shall be carried out until a method statement detailing a scheme for dealing with the suspect contamination has been submitted to and agreed in writing with the LPA.
13. a. Prior to first use or occupation of the development hereby permitted, the means of access shall be paved with a hard-bound surface for at least the first 10m from the highway boundary. Such surfacing shall thereafter be retained and maintained in perpetuity. The maximum gradient over a 5m distance (from the highway boundary) shall not exceed 1 in 15.
- b. Prior to first use or occupation of the development hereby permitted, pedestrian visibility splays of at least 2m x 2m shall be provided on each side of the vehicular access. These measurements shall be taken from and along the highway boundary. The splays shall thereafter be permanently retained and kept free of all obstacles to visibility over 0.6 metres in height above access/footway level.

c. Prior to first use or occupation, the proposed vehicular access and parking facilities shall be provided in accordance with the approved plans and shall thereafter be set aside and retained for those purposes.

d. Prior to first use or occupation, suitable drainage shall be provided at the end of the driveway to ensure that surface water from the vehicular access does not discharge onto the highway or adjacent land.

e. No gate(s), barriers or means of enclosure shall be erected within 8m of the highway boundary. Any such feature erected beyond that distance should be hung to open inwards only. The gates shall be retained as such thereafter.



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