The Statement was submitted to the Inspectorate on 31 July 2019
Recommendation to the Council

1. That Wyre Council can confirm that they have a 5 year supply of deliverable housing sites (5 year HLS) for one year, ie until 31 October 2020.

2. That the 5 year HLS should be reduced by 313 dwellings (leaving a supply of 3,207 units and reducing the supply in years to 5.18 years) due to the removal of units from that supply relating to the following sites:
   i) Site SA1/23 2771, Land off Garstang Road, Barton – remove 64 units;
   ii) Site 2856, West of Calder House, Calder House Lane, Bowgreave – remove 12 units;
   iii) Site SA1/22 2770, Daniel Fold Farm, Phase 2, Daniel Fold Lane, Catterall – remove 20 units;
   iv) Site SA1/1 2813 West of Broadway – remove 25 units;
   v) Site SA3/1 2259, Fleetwood Dock and Marina – remove 10 units;
   vi) Site SA1/11 2736B, Inskip Extension – remove 20 units;
   vii) Site 2727, North of Rosemount Avenue, Preesall – remove 44 units;
   viii) Site SA1/4 2776, Land off Holts Lane, Poulton – remove 57 units;
   ix) Site SA1/4 2792, Land off Brockholes Crescent, Poulton – reduce by 21 units;
   x) Site 2261B, Land north and east of Bourne Road, Thornton – remove 30 units.

Context to the Recommendation

3. In July 2018 Paragraph 74 of the National Planning Policy Framework (the Framework) introduced an Annual Position Statement (APS). The Housing Supply and Delivery Planning Practice Guidance (PPG) in September 2018, and updated in July 2019, sets out the process that local planning authorities should follow if they wish to confirm their housing land supply through an APS. Paragraph 011\(^1\) of the PPG indicates that plans that are recently adopted, including those adopted under the 2012 Framework, can benefit from confirming their 5 year HLS through an APS. The Council advised the Planning Inspectorate of its intention to do so by the required 1 April 2019.

4. The PPG says that when assessing an APS, the Inspectorate will carry out a 2-stage assessment – whether the correct process has been followed and the sufficiency of the evidence submitted.

\(^1\) Reference ID: 68-011-20190722.
5. I have assessed the submitted APS solely on its merits, and have not considered any other material other than the supporting evidence relating to stakeholder engagement.

Stage 1

Does the Council have a recently adopted plan?

6. For the purposes of paragraph 74 of the Framework, a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year. The Wyre Local Plan 2011-2031 (the Local Plan) was adopted on 28 February 2019 and, as of the date of submission of the APS, it is therefore a recently adopted plan.

Has satisfactory stakeholder engagement been carried out?

7. The PPG identifies what engagement a Council will need to undertake and who the Council can engage with.

8. Telephone surveys were carried out by the Council in 2017 and 2019, involving developers, landowners and agents, to gain a better understanding of the dynamics of housing delivery across the borough. Written records of these surveys were taken by the Council which, relating to the relevant conversation, were sent to the respective consultees to enable any amendments to be added. If agreed as a fair record then no further action was required from them. This established an agreed position on individual sites. 38 developers and agents were contacted in 2017 in relation to 56 large sites and 34 responses were received. In 2019, 38 were contacted relating to 59 large sites, with 35 responses and 1 part response.

9. The Council also produced a draft APS which was the subject of public consultation for 4 weeks from 7 June 2019. This was advertised on the Council’s website and 226 emails/letters were sent to landowners, developers, agents, and other stakeholders including Registered Social Landlords, utilities and services providers, the county council and five neighbouring local authorities. The bodies and organisations concerned were identified from the local plan consultation database and those developers and agents known through, for example, the planning application process. 11 responses were received from a mix of planning agents, developers and public bodies. Concern has been expressed about there being only summary information available relating to the previous consultation process for consultees to comment on. However, despite full correspondence details not being available, I have no substantive basis to consider that the level of information provided was insufficient to enable consultees to comment on the deliverability of sites.

10. The Council considered the responses and, where thought to be appropriate, made amendments including in respect of deliverability in some cases, before producing the APS and adjusted 5 year HLS. A significant adjustment through this process related to the exclusion of units comprising the permanent

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2 Footnote 38
occupation of holiday mobile homes. This is because the Council has taken the position that in planning terms the use of such sites for permanent accommodation is unlawful.

11. Based on the above methods, extent of engagement and response rates, I conclude on this matter that satisfactory stakeholder engagement has been carried out. Furthermore, an appropriate schedule of response data has been produced and submitted, including in relation to remaining disputed sites with the Council’s comments added in each case. The Council has also provided a schedule of, and its comments on, general responses concerning the nature of the APS process and general deliverability matters.

Stage 2

Is the evidence submitted sufficient to demonstrate a 5 year HLS?

Requirement

12. The calculation of a 5 year HLS has 2 elements. The first is the requirement, which includes the annual requirement, any shortfall in delivery and the appropriate buffer (10%)\(^4\). In respect of the buffer, I note that this was set at 20% for the Local Plan as the Inspector considered there to have been persistent under delivery. Notwithstanding the 10% requirement set out in the Framework, the latest Government published Housing Delivery Test (HDT) results in any case show that Wyre has not under-delivered over the 3 years concerned between 2015 and 2018.

13. The Local Plan sets out a housing requirement figure of 460 dwellings per annum, amounting to 2,300 over the five year period. The annual five year requirement, having taken account of a shortfall in delivery since 2011, spread over the remaining years of the Local Plan period (the Liverpool method), plus 10% buffer, is 619 dwellings. The Council’s position as set out in the APS, following the stakeholder engagement, is that there is a total supply of 3,520 dwellings thereby equating to 5.69 years’ worth of supply.

14. I have had regard to the disputed position that, despite the Local Plan use of the Liverpool method, the Sedgefield method would be more appropriate, spreading the shortfall over just the five year period. The PPG\(^5\) indicates that any shortfall should be dealt with by the Sedgefield approach, then the appropriate buffer added. However, it continues to say that if a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal. The Local Plan Inspector found that the Liverpool method was justified and would still achieve a significant boost to housing supply, albeit with the application of a 20% buffer.

15. I have had regard to concerns raised about changes in national policy since the Local Plan was examined. In particular, paragraph 73 of the Framework sets out, amongst other things, that local planning authorities should identify

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\(^4\) Framework paragraph 73.

\(^5\) Paragraph: 031 Reference ID: 68-031-20190722
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 strategic policies are more than five years old. Concern is raised that the Local Plan Inspector did not accept the Liverpool method in that context, taking account of the change of process once the policies are more than five years old.

16. Given the HDT results referred to above, which show that delivery significantly exceeded the requirement over the 3 year period, I have no substantive basis to consider differently to the Local Plan Inspector in terms of the Liverpool method still achieving a significant boost to housing supply. I therefore consider that it would not be necessary to adopt the Sedgefield method.

### Supply

17. The components of supply within the Council’s 5 year HLS figures comprise 3,420 dwellings on known deliverable sites as of the base date of 31 March 2019 and an allowance for 100 windfalls, a total of 3,520 dwellings. The Council also confirms that all dwelling figures in the 5 year HLS position are net, taking account of demolitions.

### Windfalls

18. The windfall allowance in the APS amounts to 50 dpa for sites of less than 25 dwellings not specifically identified in the development plan, relating to the last two years of the five year period to avoid double counting of commitments. This figure is the same as for the Local Plan and is based on evidence showing a trend for such developments to exceed 50 dwellings per annum (dpa) over recent years. The Framework and PPG provide for the inclusion of a windfall allowance subject to there being compelling evidence that they will provide a reliable source of supply. Based on the submitted evidence, the inclusion of the figure of 100 dwellings is reasonable and realistic.

### Analysis of the Housing Sites in Dispute

19. The APS submitted by Wyre Council has identified 39 sites that remain in dispute and where engagement comments claim that the site should either be removed from the supply due to being undeliverable or that the contribution to the supply should be changed. I have considered the deliverability of these sites below, having regard to the glossary entry in the Framework relating to the term ‘deliverable’. The remaining sites included within the APS disputed sites schedule are those stated in that document to be no longer disputed by the Council, which I have therefore not considered.

20. I have had regard to concerns about delays to development caused by the masterplan process, which is a requirement of Local Plan policy, together with equalisation issues where contributions to needed infrastructure and services provision are required to be spread between developers where there are more than one involved. I have considered each of the disputed sites on its merits, taking account of these issues where they are relevant. Notwithstanding this, I note that it is often the case that the masterplan process is continuing
concurrently with an outline planning application and that equalisation matters would have to be resolved regardless of whether a masterplan was produced.

**Site SA1/23 2771 Land off Garstang Road, Barton**

21. This is an allocated site with outline permission only, for 72 dwellings, 64 of which are currently included within the 5 year HLS provision. A reserved matters (RM) application was withdrawn and the Council has had pre-application discussion with another housebuilder. However, it is unclear as to whether the site has been sold and whilst a new RM application was expected in the late summer, I have no updated evidence on this. The Council acknowledges that delivery of the site may be delayed but not to the extent that no dwellings would be delivered within the five year period. In light of the uncertainty surrounding this site, there is not clear evidence that there will be any housing completions within the 5 year HLS period.

**Site SA1/24 2772 Rear of Shepherds Farm, 771 Garstang Road, Barton**

22. This is a site allocated for development in the Local Plan with RM consent for 34 dwellings. The landowner has been working with a developer but as of 2 April 2019 has stated that development will not commence for at least another 12 months. It is also recorded that the landowner will be assessing the market this year to decide whether to retain the site and develop themselves or sell it on. Although there are earlier indications of the landowner’s intention to develop the site at only a limited build out rate, that was not repeated in the later communication with the Council. There is no clear basis to indicate that the full 34 dwellings will not be built out within the five years, even if commencement were to be delayed for a year.

**Site 2856 West of Calder House, Calder House Lane, Bowgreave**

23. There is outline planning permission for 12 dwellings. A subsequent full planning application has been submitted for 9 dwellings. However, I have received no evidence of any decision taken on that application. Although the submission of the full application shows an intention to progress development on the site, it is of a revised nature without indication of any planning permission having been granted. Without either a RM consent in place or certainty in relation to a fresh full application, there is not clear evidence that there will be any housing completions within the 5 year HLS period.

**Site SA1/18 2773 Land at Garstang Road, Bowgreave**

24. This is a site allocated for development in the Local Plan. Although RM approval for 46 dwellings and the discharge of conditions have occurred since the base date, these circumstances show clear evidence of progression since the grant of outline permission prior to that date. It is therefore likely that the 46 dwellings will be built within the 5 year HLS period.

**Site SA1/20 2774 Garstang Country Hotel & Golf Club, Garstang Road, Bowgreave**

25. Outline permission with RM approval is in place for 78 dwellings. A subsequent further RM application for 76 dwellings on part of the site has been submitted with no evidence as to any decision taken on it.
Nevertheless, that provides further indication of an intention to progress development of the site, as does a full planning permission being in place for 6 dwellings on the site, subject to the discharge of conditions. Notwithstanding those other further applications, there is therefore not clear evidence that 78 dwellings will not be built on the site within the 5 year HLS period.

**Site SA3/2 2683 Land bounded by Garstang Road, A6 and Joe Lane, Catterall**

26. Planning permission is in place and 59 dwellings have already been completed in the first year of construction, leaving a further 141 units. Even based on a cautious assessment of delivery in the five year period, on this basis there is no substantive reason to consider that those 141 units will not be built in that time, particularly as it is not from a standing start.

**Site SA3/2 2683 Land bounded by Garstang Road, A6 and Joe Lane, Catterall**

27. This is a site allocated for development in the Local Plan. Although planning permission for 42 retirement properties has lapsed, there is extant planning permission for 40 dwellings within the allocated site, albeit granted since the base date. There is therefore clear evidence of progression towards development, and with that number of dwellings it is highly likely that they will be constructed within the 5 year HLS period.

**Site SA1/21 2702 Daniel Fold Farm, Daniel Fold Lane, Catterall**

28. Development is underway on this site with 16 dwellings already complete and 21 under construction at the time of the Council’s APS consultation with the developer. Development within the five year period is therefore not progressing from a standing start and I have no substantive basis to consider that the developer’s expected build out rate of 24 dpa would not be met. There is not clear evidence that 101 dwellings will not be built on the site within the 5 year HLS period.

**Site SA1/22 2770 Daniel Fold Farm, Phase 2, Daniel Fold Lane, Catterall**

29. This is an allocated site in the Local Plan with outline planning permission for 66 dwellings. Although a masterplan is being progressed for the site, this remains in draft form. Furthermore, although the site is being actively marketed, there remains no developer in place and no RM application submitted, albeit that a masterplan would be likely to guide any such proposal. The Council considers that a contribution of 20 units within the five year period would be appropriate, having lowered the figure from 50 due to the reduced progress made. However, for the above reasons, although that contribution would be fairly low, there is not sufficiently clear evidence that even those will be built within the 5 year HLS period.

**Site 2797 Carleton Court, 155-161 Lord Street, Fleetwood**

30. There is full planning permission for a change of use to provide 20 units on the site with one year remaining until it expires. The site owner has confirmed that he is actively working to bring the site forward and considering alternative occupancy types, indicating progression. Although there have been issues relating to the insertion of a lift, it remains the case that detailed
permission exists for 20 units without clear evidence that commencement will not occur within the year and then completion in five years.

**Site 2831 Former Fleetwood Health Centre, London Street**

31. Detailed planning permission is in place for 19 dwellings albeit that a new owner of the site is intending to submit a fresh planning application for 18 units. This in itself indicates progress towards development but there is also no substantive basis to consider that the original permission would not be implemented if necessary.

**Site SA1/1 2813 West of Broadway**

32. This is a site allocated for development in the Local Plan but without any planning permission in place or applications pending. Site investigation work has been completed on the site, and following recent marketing there was some interest in purchasing the site, albeit that a further necessary marketing exercise was anticipated to take place in August. Despite some progress towards enabling development through the site investigation work, without a purchaser or any planning applications pending, there is not clear evidence that there will be any housing completions within the 5 year HLS period.

**Site SA3/1 2259 Fleetwood Dock and Marina**

33. This is an allocated site for development with no planning permission or applications pending, albeit that work towards producing a masterplan is ongoing in respect of development options. However, the masterplan is not in place and there are no firm thoughts on how to develop the site. This appears to be reflected in the low number of units (10) set out as the contribution to 5 year HLS whereby the site capacity is much greater. For the above reasons, there is insufficient clear evidence that even that number will be constructed in the 5 year HLS period.

**Site SA3/4 2819 Forton Extension**

34. This is an allocated site with an outline planning application for 210 dwellings pending since May 2018. Despite no permission being in place, a masterplan is being progressed alongside that application which would be likely to guide more detailed proposals and minimise the time taken within the RM application process. Furthermore, although the land is in multiple ownership, the majority landowner is leading the master-planning process. In light of the extent to which there is progression towards development of the site, it is likely that a small proportion of those total number of dwellings will come forward in the five year period. The cautious figure of 40 units put forward by the Council is therefore reasonable and realistic.

**Site 2769 Garstang Business & Community Centre, 96 High Street, Garstang**

35. Detailed planning permission for 18 dwellings is in place and remains extant and implementable. A new full planning application has been subsequently submitted and approved, albeit since the base date, demonstrating further progression. The inclusion of the 18 units in the APS 5 year HLS contribution is therefore realistic.
Site SA1/16 1567B South of Kepple Lane, Garstang

36. There is outline planning permission in place for up to 75 dwellings with a RM application pending on this allocated site. Furthermore, separate planning permission is in place and works have started for a proposal elsewhere to enable the travelling show people to relocate from the site. Revised plans were also due to be submitted soon after a meeting in July 2019 between the Council and land promoter. There is therefore clear evidence of progression towards the development of the site and the Council has realistically reduced the original number of units put forward as contributing to 5 year HLS from 55 to 30 to take account of the delay in respect of the RM application.

Site SA1/16 1567D Dunollie, Kepple Lane, Garstang

37. There is outline planning permission on this allocated site for 50 dwellings. A subsequent application for variation of a condition was approved in July 2019 for retirement accommodation and another discharge of condition application and a RM application, albeit for a different mix of dwellings to that originally proposed, are pending. The developer has also indicated the intention to build out the development in one year from Autumn 2020. Even if not within a year, there would remain a significant amount of time within the five year period to complete it. There is therefore clear evidence that the dwellings concerned are likely to be completed within the five year period.

Site SA3/5 2767 West of A6, Nateby Crossing Lane & Croston Barn Lane, Nateby, Garstang

38. Outline planning permission has been granted previously for 270 dwellings on this allocated site. A subsequent outline application for 269 dwellings has a resolution to grant permission subject to the completion of a legal agreement. The multiple landowners are represented by a land promoter, and discussions with the Council have taken place relating to producing a masterplan. There is no evidence of developer interest and a RM application remains to be submitted. Nevertheless, in light of the degree of progression towards development of the site, a cautiously low proportion (25) of the total number of dwellings included within the 5 year HLS figures, to account for the likelihood of some development towards the end of the five years, is reasonable and realistic.

Site SA1/14 2817 West of Cockerham Road

39. This is an allocated site for development in the Local Plan. There are no current planning permissions or pending applications. However, whilst two of the landowners have withdrawn from the process of developing their parts of the allocation site, a masterplan for the majority of the site is being actively progressed by a national developer, working with the Council. A draft masterplan has been submitted and a full planning application being prepared for 84 units. In light of that degree of progress and the forecast delivery rate, taking account of this being lower in the first year of development, the APS contribution of 45 units within the 5 year HLS period is reasonable and realistic.
Site SA1/15 2818 South of Prospect Farm, west of the A6

40. This is an allocated site for development in the Local Plan. There are advanced discussions with a developer and a pre-application meeting has been requested. Initial masterplan discussions are also scheduled. The landowners therefore consider that there would be a contribution to the 5 year HLS. However, there is insufficient certainty relating to the progression of this site and the Council, in taking a cautious approach, has not included any of the dwellings in the allocation within the 5 year HLS period. I have no substantive basis to consider differently.

Site 2903 Willow Grove, West End, Great Eccleston

41. This relates to lawful use having been established for 49 mobile homes to be used for permanent housing instead of the existing 67 static holiday mobile homes. Despite contentions that the owner is only exploring options for the site, the submission of an application for a certificate of lawful use and of a draft layout plan to the Council’s Licensing section is evidence of progression towards the 49 units proposal. I have no substantive basis to speculate otherwise.

Site SA3/3 2691A Land off Copp Lane, Great Eccleston

42. This is an allocated site for development in the Local Plan. It is one of two parcels being developed or, in the case of the other parcel, proposed to be developed, by the same developer. Development has commenced on this particular site with 39 completions recorded, leaving a further 51. Continuing at that rate or even the developer’s estimated build out rate of 25 dpa, these would be highly likely to be completed within the 5 year HLS period.

Site SA3/3 2691B Land off Copp Lane, Great Eccleston

43. This site relates to the second parcel of the allocation referred to above for which there is outline planning permission for 93 dwellings. RM approval has also been granted since the base date and groundwork commenced. Despite the RM approval being since the base date, there is clear progress in the development of the site. The developer has also confirmed that commencement of development on this site would not wait until completion of the first parcel, as indicated by the groundworks that have occurred. Even at the developer’s estimated build out rate of 25 dpa, and taking account of lower initial rates, completion of the 93 units within the 5 year HLS period is therefore realistic.

Site SA3/3 2691C West of Great Eccleston

44. This is an allocated site for mixed use development in the Local Plan with no planning permission in place. Although there are multiple land ownerships, one promoter has control over the majority of the site. Furthermore, a series of meetings have occurred in respect of the production of a masterplan and public consultation has been conducted on the concepts within this. A revised masterplan has been received since the base date which is being made ready for consultation with stakeholders prior to submission to the Council’s Cabinet for approval. This is subject to agreement on the process of equalisation across the site to enable proposed community uses to be delivered in a timely
manner as part of a mixed use scheme. There is also a planning application pending for 13 dwellings on part of the site, subject to the resolution of issues needing to be addressed through the masterplan process. It is also submitted that there is an intention to make a planning application in early August for development of the site, albeit that I have no confirmation that this has occurred.

45. For the above reasons, I consider that there is clear evidence of progress towards development of this site and that the forecast completion of 45 of the total number intended dwellings within the 5 year HLS period is reasonable and realistic.

Site SA1/12 2680 North of New Holly Hotel and Bodkin Cottage, Hollins Lane, Forton

46. This is an allocated site for development in the Local Plan with outline planning permission. A RM application has also been submitted, and although this has been since the base date, it indicates clear progress towards the development of the site. The developer also indicated an expectation to be on the site in 2019, and with an estimated lead in time of 6-9 months anticipates sales at a rate of 2 dwellings per month and completion within 2-3 years. Completion of the total of 38 dwellings within the 5 year HLS period is therefore a realistic prospect.

Site SA1/13 2703 & 2816 North of Conder Mount, east of Hollins Lane

47. This is an allocated site for development in the Local Plan with outline planning permission for up to 51 dwellings. Although no RM application has been submitted, a full planning application has been submitted to increase the number of dwellings. Furthermore, a masterplan has been approved since the base date. The developer has also stated the intention to commence work on the site in 2019 with a build out rate of approximately 30 dpa. These factors demonstrate good progress towards the development of the site and the realistic prospect of completing at least 51 dwellings within the 5 year HLS period.

Site SA1/11 2736A Land to north & south of Preston Road, Inskip

48. This is an allocated site for development in the Local Plan with planning permission in place and construction commenced. Within the 5 year HLS period the continued development of the site is therefore not from a standing start, such that the completion of the remaining 46 dwellings within that period, at a rate estimated by the developer of 22-25 dpa, would be highly likely.

Site SA1/11 2736B Inskip Extension

49. This is an allocated site for development in the Local Plan with no planning permission in place. An outline application for 30 dwellings has been submitted by a land promoter who the Council highlights has a track record of bringing sites forward. Despite that, in light of there being no planning permission in place and no developer on board, there is not clear evidence that housing completions will occur within the 5 year HLS period.
Site 744 North west of Pilling Lane, Preesall

50. Planning permission is in place for 72 dwellings with 68 shown contributing to the 5 year HLS in the APS. Although it is submitted that it is the developer’s intention to submit a new full application for a reduced number of dwellings, that does not guarantee that the original permission will not be implemented. Furthermore, even if that development were not to commence until spring 2020, at a build out rate of approximately 22-25 dpa, completion of 68 units within the 5 year HLS period would be realistic. There is not clear evidence that that number of dwellings will not be delivered in that period.

Site 2727 North of Rosemount Avenue, Preesall

51. There is outline planning permission for 44 dwellings on this site. However, no RM application has been submitted. Instead, there is a pending full planning application for 46 dwellings. There is uncertainty as to whether that application is likely to be approved and the developer has stated that if it is refused and dismissed on appeal that there is a strong chance that they would not progress with the site. There is therefore not clear evidence that any of the dwellings concerned will be completed on the site within the 5 year HLS period.

Site SA1/5 1357A Land off Garstang Road East, Poulton

52. Development has commenced on this allocated site. It is disputed as to whether the 250 dwellings included in the 5 year HLS would be delivered in that period. However, there are two developers involved such that the combined annual delivery rate is greater. The rates indicated add up to approximately 60 dpa which would not be from a standing start and so would enable all 250 to be completed in the five years. Even at the more cautious rate of 50 dpa put forward by the Council, they would still be likely to be completed in the time.

Site SA1/4 2776 Land off Holts Lane, Poulton

53. This is an allocated site for development in the Local Plan with outline planning permission. However, despite a pre-application meeting between the Council and a developer relating to the submission of a RM application, no such application has been submitted. There is also an ongoing application to remove a condition of the outline permission relating to provision of affordable housing on viability grounds which has remained undetermined for some time. This therefore casts doubt as to the timescales for further progression towards development of the site. As such, there is not clear evidence that the 57 dwellings concerned will be completed on the site within the 5 year HLS period.

Site SA1/4 2792 Land off Brockholes Crescent, Poulton

54. This is an allocated site for development in the Local Plan with outline planning permission and an undetermined RM application. In this respect there have been issues relating to drainage, solutions to which remained to be agreed by the Council at the time of the APS submission. There is nevertheless active progression towards development of the site and it is likely that dwellings will be completed within the 5 year HLS period. However,
whether all 106 dwellings currently shown as comprising the 5 year HLS contribution would be completed within that period is put in doubt by the unresolved RM application and the subsequent need to discharge pre-commencement conditions and undertake site preparation works. There is insufficient certainty of any completions within the first year of the 5 year HLS period or even the second year. On that basis, taking account of the trajectory referred to in the submissions, this would result in a reduction of 21 dwellings completed within that period.

Site SA1/6 2815 Land south of Blackpool Road

55. This is an allocated site for development in the Local Plan with three developers involved. One has submitted an outline planning application for 35 dwellings and another a hybrid application, detailed for 187 dwellings and outline for a primary school, both of which are pending a decision. An application by the third developer was anticipated within 2019. A masterplan for the site is being progressed by all three developers, which is running concurrently with the planning applications. This is therefore unlikely to delay determination of those applications in terms of the same issues and equalisation needing to be resolved. I have no substantive evidence to indicate that the non-residential elements that are required to be delivered would cause any additional delay either. There is therefore clear progress towards the residential development of the site.

56. Despite developer optimism towards commencing on site in early 2020, in light of there not being any planning permissions in place, a cautious and realistic approach would point to this being later with first completions in 2021. On that basis, and with the three developers working concurrently on separate parts of the site, a build-out rate of 60 dpa would be reasonable and realistic. Taking account of the initial lead in time, the completion of 20 units in year 3 of the 5 year HLS period, and 120 units in the following two years is realistic. For these reasons, there is clear evidence that 140 dwellings would be likely to be completed within the five year period.

Site SA1/7 2568A South and west of Birch Grove, Stalmine

57. This is an allocated site for development in the Local Plan and comprises one of three fields (field A) in the overall allocation. Planning permission is in place for this particular site and development underway with dwellings already completed. As the development within the 5 year HLS period is not from a standing start, and given the developer’s anticipated build out rate of around 24 dpa, the 64 units concerned would be comfortably completed in that period.

Site SA1/7 2568B South Stalmine

58. This comprises another of the three fields (field B) referred to above within the overall allocation with outline permission for 65 dwellings allowed on appeal. A legal challenge to that decision has not resulted in the quashing of planning permission, albeit that it was ruled that one ground was arguable, which the parties have been encouraged to agree in mediation. The Inspector also found that a masterplan was not necessary in this case. A new outline application for the same number of dwellings is also pending. Although RM approval will still be required, there would be sufficient time for that process
to occur whilst the development on field A is built out. As the site would be developed by the same developer, in following on from that first development on an adjoining site there is no reason to consider that the rate of 24 dpa would not be continued. On that basis, there is clear evidence that 56 dwellings would be completed within the 5 year HLS period.

Site 2261B Land north and east of Bourne Road, Thornton

59. There has been planning permission in place on this site since 2012 which has been kept alive by a technical commencement. However no further development has progressed, and the site is in the process of being sold. Whilst that indicates some progress towards development, as opposed to previous inactivity, as at July 2019 the sale was dependent on legal negotiations and due diligence. There is therefore no certainty in respect of the sale of the site and any subsequent progression towards development. Additionally, were the sale to occur, the submissions make reference to the need for flooding issues to be considered with any new planning application. In this respect, it could not be assumed that such an application would be for 100% affordable housing in terms of introducing the consideration of a need for such accommodation. For the above reasons, there is sufficiently clear evidence that none of the 30 dwellings concerned will be completed within the 5 year HLS period.

Site SA1/2 2726A Land east of Lambs Road, Thornton

60. This is an allocated site for development in the Local Plan with planning permission in place for 157 dwellings. Development commenced on the site early in 2019 prior to the base date and so it is not from a standing start within the 5 year HLS period. The developer considers that it would be a reasonable expectation to anticipate a build out rate of 30 dpa on this site, and I have no substantive basis to consider this to be unrealistic. At that rate it is likely that the 145 dwellings set out in the APS as contributing to the 5 year HLS will be completed within that period.

Site SA4 2260 Hillhouse EZ

61. This is an allocated site for development in the Local Plan with an adopted masterplan in place. Furthermore, a hybrid planning application has been submitted which includes provision for up to 42 dwellings. The submissions also include confirmation that the issue regarding the need to provide replacement sports facilities elsewhere prior to the commencement of any development has been resolved. This indicates that such facilities have now been provided. Furthermore, an outline application for a further 85 dwellings has been submitted by the site owner. Whilst that would be subject to the need for a subsequent RM application, permission for the full application would enable the potential for development to commence on the site in the mean-time. The owner has also stated the intention to develop the site as soon as possible, subject to planning consent being granted, and that 10 units could be built in 2020/21.

62. There is therefore evidence of good progress towards development of the site. With completions in 2020/21, that would result in the potential for more than the APS 5 year HLS figure of 70 dwellings being provided in that period. However, taking a cautious approach on the basis of first completions in
2021/22, and for the above reasons, the provision of the 70 dwellings would be a realistic prospect within that five year period.

**Conclusion on deliverable housing supply**

63. Based on the above findings, 313 dwellings should be removed from the total 5 year HLS reducing it to 3,207 units and reducing the supply in years to 5.18 years.

**Conclusion**

64. For the reasons given above, I conclude that the Council can demonstrate that it has a 5 year HLS.

*Andrew Dawe*

INSPECTOR