



Summary proof of evidence of Ben Pycroft BA (Hons), Dip TP, MRTPI in relation to housing land supply

Residential development of up to 100 no. dwellings – Land
rear of Oakdene, Chain House Lane, Whitestake,
Lancashire

for Wainhomes (North West) Ltd

Emery Planning project number: 18-294

PINS ref: APP/F2360/W/19/3234070

LPA ref: 07/2018/9316/OUT

Project : 18-294
Site address : Land rear of Oakdene,
Chain House Lane,
Whitestake, Lancashire
Appellants : Wainhomes (North West)
Ltd
Date : 15 October 2019
Author : Ben Pycroft

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited
trading as Emery Planning.

Contents:

1. Introduction	1
2. Assessment of the Council's housing supply	2
3. South Ribble's Five Year Housing Land Supply	6

1. Introduction

- 1.1 This summary proof of evidence is submitted on behalf of Wainhomes (North West) Limited (i.e. the Appellant) in support of its appeal against the decision of South Ribble Borough Council to refuse to grant outline planning permission for the erection of up to 100 dwellings at land to the rear of Oakdene, Chain House Lane, Whitestake, Lancashire (LPA ref: 07/2018/9316/OUT).
- 1.2 This summary and my main proof of evidence specifically address matters relating to housing land supply. They should be read alongside the proof of evidence prepared by Mr Harris, which deals with all other planning matters in relation to the appeal.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and public inquiries across the country.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct, and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.6 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents and the statement of common ground regarding housing land supply matters.

2. Assessment of the Council's housing supply

Stage 1: Agreeing the base date and five year period

- 2.1 The base date is the start date for the five year period for which both the requirement and supply should relate.
- 2.2 The current Housing Land Position (HLP) has a base date of 31st March 2019 and a five year period of 1st April 2019 to 31st March 2024. I have assessed the supply at 31st March 2019 as that is the most up to date position.

Stage 2: Identifying the housing requirement

- 2.3 National planning policy and guidance 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.
- 2.4 Policy 4 of the Core Strategy was reviewed and found not to require updating in 2017. To inform the review, the three Central Lancashire Councils appointed consultants GL Hearn to prepare a Strategic Housing Market Assessment (SHMA). The 2017 SHMA reviewed the housing needs in Central Lancashire but the three Councils concluded that the housing requirement did not need updating because the assessed need was only marginally below the adopted requirement set out in Policy 4. Following this, a joint Memorandum of Understanding and Statement of Co-operation relating to the provision of housing land was signed in October 2017¹. The MOU confirms that the Councils agree to continue to use the housing requirements in Policy 4 of the Core Strategy until the adoption of the new Local Plan. Preston and Chorley Councils both only assess their respective five year housing land supply against the adopted housing requirement set out in Policy 4 of the Core Strategy on the basis that the policy has been reviewed and found not to require updating.
- 2.5 Whilst the review of policy 4 took place before the July 2018 Framework was published and the standard method for calculating local housing need was introduced, the PPG provides guidance in such circumstances. Paragraph 61-062 of the PPG explains that because the review took place

¹ Core document 6.9

within the last five years, the policy can still be regarded as up to date because the adopted housing requirement is not below the local housing need figure. It is only in circumstances where the local housing need figure is higher than the adopted housing requirement that means there has been a “significant change” in housing need.

- 2.6 In addition, the Council has entered an agreement with the Government, Preston and Lancashire County Council known as “City Deal” to deliver 17,000 new homes over a 10 year period in Preston and South Ribble. Therefore, the Council is committed to delivering many more new homes than even the adopted housing requirement requires. Within this context, it is surprising that South Ribble Council now considers that its five year housing land supply should be measured against a figure of just 206 homes per year.

Stage 3: Identifying the past shortfall

- 2.7 The base date of the adopted plan is 1st April 2010. However, as policy 4 of the Core Strategy explains, the backlog since 1st April 2003 should be taken into account. The planned housing requirement set out in the Core Strategy is 417 dwellings. By 31st March 2019, 6,672 dwellings should have been completed based on an annual requirement of 417 dwellings. According to the Council's data, only 5,562 dwellings were completed in the same period and therefore the backlog is 1,110 dwellings.

Stage 4: Identifying the method of addressing the past shortfall

- 2.8 If the adopted housing requirement is to be used, the Council agrees that the past shortfall should be addressed in full in the five year period². This is known as the “Sedgefield” method.

Stage 5: Applying the appropriate buffer

- 2.9 As set out in section 4 of my main proof of evidence above, the Council passed the 2018 HDT and therefore the 5% buffer applies in South Ribble.

² Please see the statement of common ground on housing land supply

Stage 6: Identifying a Realistic and Deliverable Supply

2.10 The Council has not provided clear evidence for the inclusion of 951 dwellings in its supply on sites with outline planning permission for major development or allocated sites without planning permission. The sites are listed in table A below and I discuss these sites further in appendix BP1 of my main proof of evidence.

Table A – Discounts to sites in the Council's supply that do not meet the definition of deliverable

Local Plan Ref:	Site Address	Status at 31/03/19	Council's 5YHLS	Appellants' 5YHLS	Difference
T	Land off Browndge Road (Site T)	Allocated	70	0	70
EE	Pickering's Farm (north of farm track running east west) - Homes England & Taylor Wimpey	Allocated	330	0	330
V	Land off School Lane/Old School Drive, Longton	Allocated	40	0	40
X	Land adjoining Longton Hall Farm, South of Chapel Lane, Longton (aka Kitty's Farm)	Allocated	65	0	65
M	Land to south/rear of Longton Hall, Chapel Lane, Longton	Allocated	95	0	95
U	Rear of Dunkirk Mill, Slater Lane, Leyland	Allocated	47	0	47
Z	Lostock Hall Primary School, Avondale Drive	Allocated	10	0	10
CC	East of Leyland Road/Land off Claytongate Drive/Land at Moor Hey School	Allocated	60	0	60
J	Cuerden Strategic Site (Site J)	Outline pp	128	0	128
W	Land between Moss Ln & rear of 392 Croston Road, Farington Moss (aka Croston Rd Nrth aka North of the Northern Section) (Homes England)	Outline pp	106	0	106
		Total			951

2.11 In addition, for the reasons set out in appendix **BP1** of my main proof of evidence, the build rates and lead-in times should be amended on the sites in table B below, which results in a further deduction of 450 dwellings.

Table B – Discounts to sites in the Council's supply in relation to build rates and lead-in times.

Local Plan Ref:	Site Address	Status at 31/03/19	Council's 5YHLS	Appellants' 5YHLS	Difference
S	Brindle Road, Bamber Bridge (Persimmon)	Full pp	145	75	70
FF	Moss Side Test Track, Aston Way / Titan Way	Pending determination	400	100	300
H	Vernon Carus – Phase 1	Full pp	150	60	90
		Total			450

2.12 The Council has not provided compelling evidence to justify a windfall allowance of 600 dwellings in the five year supply. The only evidence the Council has provided relates to past trends. However, the average windfall rate cannot be relied on because the completions data also includes sites identified in the development, which by definition are not windfall sites. The five year supply already includes 247 dwellings on windfall sites and therefore the Council expects delivery at an even higher rate than past trends over the five year period.

2.13 The past delivery on windfall sites should not simply be projected forward. This is because the number of dwellings with planning permission on windfall sites at 31st March 2019 is significantly below that of recent years. Finally, the definition of “deliverable” set out on page 66 of the Framework requires the Council to provide “clear evidence” that housing completions will begin in the next five years for sites identified on a brownfield register. Therefore any windfall sites that are expected to come forward from this source can only be considered deliverable if the Council firstly identifies the site and secondly provides the required clear evidence.

2.14 I accept that small windfall sites will come forward and deliver dwellings in the five year period. On this basis, the windfall allowance of 177 dwellings in the previous HLP reports should be included. This results in a deduction of 423 dwellings.

2.1 In summary, I conclude that the Council's supply should be reduced by **1,824 dwellings** (i.e. 951 + 450 + 423 = 1,824). As a result, I conclude that the deliverable supply is therefore **2,174 dwellings** (i.e. 3,998 – 1,824 = 2,174 dwellings).

3. South Ribble's Five Year Housing Land Supply

3.1 I conclude that the deliverable supply is therefore 2,174 dwellings (i.e. $3,998 - 951 - 450 - 423 = 2,174$ dwellings). Against the adopted housing requirement and a 5% buffer, this means that the Council has a deliverable supply of **3.24 years**.

Table C – South Ribble's Five Year Housing Land Supply at 31st March 2019

	Requirement	
A	Annual requirement	417
B	Past shortfall at 31 st March 2019	1,110
C	Amount of past shortfall to be addressed in the five year period	1,110
D	Total five year requirement (A X 5 + C)	3,195
E	Requirement plus 5% buffer (D + 5%)	3,355
F	Annual requirement plus buffer (E / 5 years)	671
	Supply	
G	Five year supply 1 st April 2019 to 31 st March 2024	2,174
H	Years supply (G / F)	3.24

3.2 The implication of this is addressed by Mr Harris.