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Dear Ms Russell

Re: Lancaster Local Plan Examination – Revised Five Year Supply Trajectory

Following the examination hearing session on Thursday 11th April 2019, in relation to Matter 2: Housing, the Inspector has invited comments on the following documents, which were added to the examination library on Monday 15th April 2019:

- HD21.1 – Revised 5 Year Land Supply Trajectory; and
- HD21.2 – Explanatory Note to accompany the revised trajectory.

Comments are to be received by 5PM on Thursday 18th April 2019. Emery Planning is instructed to respond to these two documents on behalf of Satnam Investments Ltd whose interests relate to land to the south of Lune Industrial Estate. We do so as follows.

From the outset, the Council's housing land supply is not being "confirmed" in accordance with paragraph 74 of the 2019 NPPF. This is because under transitional arrangements, the Local Plan is being examined under the 2012 NPPF. As a result, the 10% buffer as set out in paragraph 73 of the 2019 NPPF will not apply.

The revised 5 year land supply trajectory now claims that the five year supply at 1st April 2019 on adoption of the Local Plan would equate to 3,602 dwellings. This is a 21% increase from the Council's position published just over 3 weeks ago on 22nd March 2019, which claimed the five year supply on adoption of the Local Plan would equate to just 2,973 dwellings (ref: 7.2.1). The various reasons for the increase are set out in the explanatory note but in summary, development is



expected to commence earlier on a number of the proposed allocations (e.g. Bailrigg, North Lancaster, land east and west of Grab Lane, etc) than set out in the previous trajectory.

The five year trajectory is summarised in the table below:

Year	2019/20	2020/21	2021/22	2022/23	2023/24	Total	Average
Dwellings	899	323	506	994	880	3,602	720

The Council's revised position has a number of implications in relation to the proposed housing requirement and the five year housing land supply position.

Firstly, in relation to the proposed housing requirement, there no longer appears to be any justification for the Council to seek to reduce the housing requirement from 522 dwellings p.a. to 510 dwellings p.a. This is because the housing requirement is "supply-led" and now that the Council's trajectory indicates that the large strategic sites will start delivering earlier than the previous trajectory suggested, more dwellings would be delivered in the plan period than previously suggested. We would respectfully ask that a trajectory for the whole plan period is prepared to confirm this. Notwithstanding this, the 522 dwelling housing requirement figure remains significantly below the OAN figure of 700 dwellings p.a.

Secondly, in relation to the five year housing land supply, there no longer appears to be any justification for the combination of a "stepped approach" and the application of the "Liverpool method" to address the undersupply as the Council's Matter 2 statement proposes. This is because the Council's justification for both a stepped approach and the Liverpool method was because of the reliance of large strategic sites to deliver dwellings. However, the amended trajectory now indicates that the majority of the proposed allocations will all start delivering within the five year period and in some cases as early as year 3 (i.e. 2021/22).

Within the context of an average of 720 dwellings per annum over the five year period 2019-24 as set out in the trajectory and summarised in the table above, there is no justification for reducing the requirement to 450 dwellings over the five year period by way of a stepped approach. This would be contrary to the aim of significantly boosting housing land supply as set out in paragraph 47 of the 2012 NPPF.

As set out in our hearing statement and discussed in the first three days of hearing sessions, our client remains of the view that the most appropriate way to address the unmet need which will not be met by the proposed housing requirement is to allocate further sites for residential development, including their site at land south of Lune Industrial Estate, Lancaster. This would also assist the Council in being able to demonstrate and maintain a five year supply of housing land over the plan period. The Inspector will recall that our client's site is to be discussed as an omission site during the hearing session on 26th April 2019. We look forward to discussing the site at that session.

Yours sincerely
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