Part B – Please use a separate sheet for each representation

Name or Organisation: Lucas land & Planning

3. To which part of the Local Plan does this representation relate?

Paragraph

Appendix 1(Housing)

Policy

Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We have already made an objection concerning the housing land supply information and the fact that housing supply under-provision has occurred over a number of years (at least over the past 4 years) without redress.

The housing land supply must be prepared in accordance with Government Planning guidance. The current housing land supply is now only at best 4.6 years (August 2019). Given the fact that the 5 year housing supply requirement is a minimum figure there is clearly a problem which needs to be addressed as a matter of urgency.

There are a number of supply anomalies which do not accord with Government guidance and requirements.

Reviewing the Appendix 1 concerning the Housing Site Schedule and Sources of Housing Supply: where are the itemised housing sites? There is no clarity on this aspect at all in a public Local Plan document. The absence of clarity means obfuscation-why have obfuscation of such important and fundamental housing information? The reason can only be that the housing supply figures are incorrect. We know there are issues with at least the following sites: Land south of Brooke Academy, Silent Pride (Little Stanion) Parkland Gateway and West Corby SUE but there are other sites which do not conform as readily available housing sites in the
context of the NPPF or in which the expected supply figures have been manipulated.

As to West Corby the question must be raised whether any housing will come forward from this site within the next 4 years at all?

The weakness of the schedule is that it does not clarify individual sites, the progress of individual sites or any detail in respect of individual sites. It is simply not sufficient or appropriate as a demonstrable table showing a 5 year housing land supply.

(Continue on a separate sheet/expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Provide full housing land supply details of all sites and necessary background information in accordance with Government planning and housing policy in this Part 2 Plan. Full clarity is required under Paragraph 73 (c) and the Housing Delivery Test.

(Continue on a separate sheet/expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

[ ] No, I do not wish to participate in hearing session(s)  
[ ] Yes, I wish to participate in hearing session(s)
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This is a fundamental aspect of the plan which needs to be addressed in a public forum.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature: [Redacted] Date: 6.9.19