

East Lindsay Core Strategy Examination

Stage 1 Core Strategy Hearing Sessions

Matter 8: Housing supply, including the 5 year supply of deliverable housing sites

Submission on behalf of Metacre Ltd

21st June 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd concerning Matter 8 (Housing supply).
2. The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (26th May 2017) and supplements the representations lodged with East Lindsey Council on the *Core Strategy Publication Version* (November 2016). The two should be read together.

Overall Supply

Question 2:

Will the policies in the plan ensure that the housing requirement of 7,768 can be met? Is the supply from CS Table A justified? Are these sites all deliverable or developable? Have any of the planning permissions for these commitments now expired or been approved for less dwellings? Are the commitment sites now listed anywhere? Should any 'lapse rate' be applied? Are numbers for the housing allocations based on appropriate density assumptions?

3. CS Table A suggests that 8,336 dwellings can be delivered from the following sources, exceeding the Council's suggested housing requirement for the Plan period by 568 dwellings (7%):
 - Inland Area commitments (2,777 dwellings)
 - Coastal Area commitments (1,308 dwellings)

- Proposed Inland Allocations (3,901 dwellings)
- Site SPY310 Spilsby (350 dwellings)

4. These housing sources are considered in turn.

Commitments, both Inland and Coastal

5. CS table A suggests a total of 4,085 dwellings deliverable from committed sites with planning permission in the Inland and Coastal Areas. It is not clear where the evidence supporting these figures is contained.
6. Council document CD21 shows the Housing Land Availability from committed Windfall Sites at March 2017 but this shows a total of 3,415 outstanding commitments in the Inland and Coastal Areas. It is noted that whilst the Inland Area figure includes affordable housing the Coastal Area figure does not, although from the affordable housing column in the table it is apparent that there are 281 additional affordable housing commitments in the Coastal Area. This brings the total from committed sites to 3,696, which is 389 dwellings less than identified in CS Table A.
7. Furthermore, it is apparent that many of these identified planning permissions have actually expired. The Council appear to have already removed a number of larger sites from earlier versions of this table where planning permission has expired, but attached at Appendix 1 to these submissions is a table showing at least a further 35 planning permissions still in the committed supply which appear to have expired (totalling 210 dwellings).
8. It is also noted that the list appears to be double counting permissions, particularly in relation to 18-20 Ramsgate (Hi-Lite Signs site – parish no. 105). It is understood that this site has had three different planning permission over the years, one for 44 dwellings, one for 9 dwellings and the most recent one for 57 dwellings. Some of these permissions have expired. Only one of these permissions should be included in the table, not all three. The most recent approval relates to 57 dwellings and the other two permissions should therefore be removed (53 dwellings in total).

9. This is not an exhaustive list, but when the above site and aforementioned expired permissions are taken into account, the committed supply is reduced to 3,433 dwellings. Metacre is also concerned that the Council have not undertaken a robust exercise to calculate the realistic delivery from the committed sites.
10. It is clear that a significant proportion of the committed sites comprise sites of 10 dwellings or less (30% of the total committed supply). Smaller sites often have a higher lapse rate for a variety of reasons and it is evident that East Lindsey is no exception to this. Indeed, CD21 indicates that many of the sites still with extant planning permission expire within the next few months or the landowner has confirmed to the Council that they are unlikely to be implemented. For example CD21 includes a sites with planning permission for 6 dwellings at Unit 4A, Thames Street in Louth even though the notes on progress states that the agent confirmed in 2016 that:

“I am not sure that this will ever go ahead. Prices to convert the premises came back way too high to be viable and since then the applicant who was the driving force behind the proposals has passed away”
11. It is also noted that the Council wish to apply a condition to reduce the period of time for Reserved Matters to be submitted. In their Planning Policy Committee Report dated 21st June 2017 they state that the justification for this is that there are some sites which “*over and over again submit applications*”. This suggests the Council has a high proportion of sites which have a history of not coming forward for development despite having planning permission.
12. It is therefore reasonable to assume that the chance of 100% of the remaining committed sites being implemented is unrealistic and a lapse rate should be applied to these sites.
13. A lapse rate of just 10% on the remaining Committed sites in the Inland / Coastal Areas would bring the supply down further to 3,090 dwellings, which is 995 less than that identified in CS Table A.

Inland allocations (3,901 dwellings)
14. Based on CD20 it appears that of the proposed housing allocations 9 already have planning permission for all or part of the site. It is also understood that when the

November 2016 SHLAA was produced the projected dwelling yields from these sites were adjusted to reflect these planning permissions. It is the 2016 SHLAA which informs the number of dwellings anticipated from the Inland allocations in CS Table A.

15. As can be seen from the table below, in 8 of the 9 sites with permission the 2016 SHLAA had to reduce its previously anticipated yield. The total housing anticipated from these 9 sites was reduced by 30% from 1,066 dwellings to 746 dwellings.

Allocation ref	Suggested Capacity pre-Nov 2016 SHLAA	Suggested Capacity in SPD	Difference in dwellings	Difference as a %
BLM305	101	97	-4	-4%
BLM310	52	52	0	0
BLM313	62	31	-31	-50%
C&T305	286	220	-66	-23%
LEG303	66	20	-46	-30%
LO302	342	240	-102	-30%
LO341	15	5	-10	-67%
MLF328	37	32	-5	-14%
WSP304	105	49	-56	-53%
TOTAL	1,066	746	-320	-30%

16. It is also noted that the DPD allows for 161 dwellings at Alford but does not actually allocate any sites for housing, referring to this being delivered by the Neighbourhood Plan. It is understood that this is at very early stages with no proposed allocations yet to be identified, reducing the level of certainty that could be attributed to this. It is also noted that 18 of the allocated sites are for 10 or less dwellings, which as previously highlighted have high lapse rates.
17. Metacre are therefore concerned that the yields for allocated sites without planning permission may be overestimated. By way of example, if the remaining allocated sites without planning permission are reduced by 30%, which is the average reduction in capacity for those with planning permission, this would reduce the suggested supply from the Inland allocations by 947 dwellings.

Spilsby Site SPY310

18. The Settlement Proposals DPD identifies 7 sites, SPY301-306 and SPY310. Other than SPY302 (35 dwellings) the remainder are all located adjacent to one another as a single urban extension. The DPD confirms that these sites are jointly referred to as SPY310 and it is noted that an application for an EIA screening opinion has been submitted by a developer for 600 houses on this entire site. The proposed allocations in CS Table A already allows for 264 dwellings coming forward at Spilsby and if you remove the 35 dwellings at SPY302 the remaining 229 dwellings must therefore be for this SPY310 settlement extension. By adding a further allowance for 350 dwellings at SPY310 in CS Table A, the Council are in effect suggesting that this site will deliver 579 houses over the Plan period.
19. Paragraph 2.11 of the Settlement Proposals DPD states that the developer has confirmed that they anticipate the site will start to come forward during the lifetime of the plan period but that its delivery will run beyond the plan period and at a rate of 30 dwellings per annum (dpa). It is apparent that the Council originally only anticipated 229 dwellings coming from this site in the Plan period, as this is the figure in the Settlement Proposals DPD.
20. It is understood that the developer is not anticipating the submission of an application until the end of 2017. Even on an optimistic basis you could assume 18 months to then obtain planning permission, enter into a s.106 Agreement and discharge conditions. If you allow a further 8 months for the necessary s.278 Agreements and delivery of any necessary infrastructure then the first house is unlikely to come on stream until at least 2020/21. However, this is a site for 600 dwellings and there may be a need for substantial infrastructure and off-site highway mitigation etc. which could mean an even longer lead in time. Nevertheless, even on this optimistic basis and applying the suggested build rate of 30 dpa, this site would only deliver 330 dwellings over the remaining 11 years of the plan period, i.e. 101 more than what is already allowed for in the Inland Allocations supply. The additional 350 dwellings identified at Spilsby in CS Table A should therefore be reduced by at least 249 dwellings.
21. Taking all of the above matters into account, and even assuming the Inland allocations will deliver the amount of housing suggested, the supply from the

allocations, Committed sites and Spilsby SPY310 falls to 7,092 dwellings in total. This is 676 dwellings less than the Council's suggested housing requirement of 7,768 dwellings. However, there are concerns about the proposed allocated sites not delivering the extent of housing anticipated and if the aforementioned 30% allowance is made for yields on the sites without planning permission, the total supply would fall to 6,145 dwellings, which is 1,623 less than the minimum requirement.

22. It is acknowledged that the Council suggest that a further 1,585 dwellings could come forward from windfall sites in the future, but the evidence base justifying this is disputed (see Question 4).
23. One of the core planning principles of the NPPF, which paragraph 17 states should underpin both plan-making and decision-taking, is to *“deliver the homes....that the country needs....meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth”*. Paragraph 47 of the NPPF goes on to require LPAs to *“boost significantly the supply of housing”* and in so doing *“ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing”*.
24. NPPF 7 also confirms that there are three dimensions to sustainable development: economic, social and environmental and that these give rise to the need for the planning system to perform a number of roles. The social role includes *“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations”*. The economic role includes ensuring sufficient land is available and at the right time to support growth and innovation, with paragraph 21 confirming that securing adequate housing is a key component for delivering investment.
25. NPPF 50 requires LPA to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, which includes meeting affordable housing needs.
26. Significantly increasing housing supply and delivering affordable housing is therefore a fundamental part of delivering the economic growth and social aspirations of Government. The housing requirement is a minimum target and to

ensure that this is delivered the Plan needs to provide sufficient choice and flexibility in its housing supply. This is acknowledged in paragraph 31 on page 28 of the Core Strategy, which states that *“The usual approach with regard to housing allocations is to provide a buffer or fall back in the allocations to ensure that if sites do not come forward then others can take up the housing need easily.”* It is considered that the Core Strategy fails in this regard.

27. Not only is there insufficient identified supply to deliver the minimum housing requirement over the Plan period, but there is insufficient choice and flexibility. It is apparent that the Council’s strategy is to deliver their requirement primarily on smaller sites. Indeed there are only nine allocated sites over 100 dwellings in size and only one over 300 dwellings.
28. Larger allocations are often better able to provide community infrastructure due to the economies of scale and can be key in delivering the level and variety of housing required in the District over the plan period. Larger sites can also make a significant contribution towards affordable housing delivery which is limited on smaller sites in the setting of the 10 unit threshold. This is particularly applicable to East Lindsey which has a high proportion of sites in the supply which are under 10 dwellings. A failure to include a sufficient number and choice of larger sites which would appeal to larger volume house builders could undermine the ability of the Council to deliver its housing requirement, including affordable housing need.
29. It is noted that despite acknowledging the usual approach of providing a buffer in the allocations to ensure that if sites do not come forward others can take up the housing need, para 31 of the Core Strategy suggests that as the Local Plan is going to be reviewed in 5 years additional sites can be allocated at that time if the need and evidence arises. East Lindsey District has a poor record in plan-making with a very extended time period from the adoption of the East Lindsey Local Plan in 1995 and the current draft Core Strategy. There is a distinct possibility that the Council will not have the resources to review the plan within five years and it is necessary for the Plan to be realistically able to deliver the housing requirement over the entire Plan period. Indeed this is fundamental to the plan being sound. There is no evidence to indicate that the Council would be able to expedite an appropriate review within the five year period.

Question 3

Why is the Spilsby site set out separately from the other commitments and allocations? Is the 350 homes in Table A additional to the 264 allocations in table B for Spilsby?

30. This is addressed in relation to Question 2.

Question 4

Is the supply of windfalls in CS Table A justified and where is this justification set out? How do these forecasts compare with past performance? Is past performance a reasonable forecast of what will happen (given the current Local Plan dates back to 1995/1999 – see para 30, page 28 of CS which sees the number of windfalls reducing)?

31. The Council refer to past performances with regards to windfall development, but this is not considered a reasonable forecast of what will happen in the future bearing in mind that the original 1995 Local Plan was adopted over 21 years ago and was only intended to cover the period to 2001. It is understood that the 1999 Alteration Local Plan simply made minor amendments to reflect the wording of new Government Guidance and that there was no actual review of the housing requirement/supply, settlement boundaries or allocations etc. Indeed it is understood that the amendments were so minor that an Examination was not considered necessary.
32. The fact that the emerging Core Strategy allocates housing sites will naturally reduce the amount of windfall development coming forward in the future. The Core Strategy itself acknowledges in paragraph 30 that having an up to date Local Plan with site allocations, phasing sites, monitoring delivery and having a clear delivery pathway for housing should see the windfall figure reduce.
33. The Core Strategy confirms in paragraph 25 (page 27) that the District does not have a history of past industrial development and that “*it is inevitable that growth will have to occur on greenfield sites*”. The number of proposed allocations which take the form of greenfield settlement extensions is a clear indication of the limited development opportunities within the settlement boundaries.
34. In this context Core Strategy policy SP4 restricts windfall development in the medium and small villages to brownfield land / disused buildings and only then when sites have been actively marketed for community, economic or leisure uses

and that the retention / conversion of any existing buildings is not possible. Such a policy is likely to further limit windfall housing development.

35. Similarly, the draft Core Strategy now seeks to restrict windfall development in the Coastal Area due to issues with flood risk and supporting text to policy SP18 suggests that the current commitments in the Coastal Area represent an over-supply based on their target of 735 homes.
36. It is also noted that the proposed allocations include a number of small sites, including sites with a capacity of just 3 dwellings.
37. Taking the above into account it is considered that past performance is not a reasonable forecast for future windfall development post adoption of the Core Strategy. In the Council's 'Table of Representations and Council Responses' (CD111), and in direct response to the question raised regarding the evidence to justify a 15% allowance, the Council state that it chose the 15% allowance as "*it just seemed like a sensible figure to aim for*" (page 99). This further demonstrates that this allowance is a purely arbitrary figure not based on robust evidence. A reliance on future windfall sites to deliver the housing requirement would not therefore offer sufficient assurance that the necessary housing will be delivered.

Question 7

Is the inland supply of 6,678 (2,777 inland commitments+ 3,901 inland allocations – Table A) sufficient to meet the inland minimum target of 6,460 in policy SP3?

38. As highlighted in relation to Question 2 the suggested supply is overestimated and would not meet the minimum Inland target. It is also relevant to note that the Inland minimum target appears to be based on the total housing requirement for the Plan period minus the Coastal Area commitments. If the Coastal Area commitments have fallen, as appears to be the case, the minimum Inland Area target will have to increase as the Council does not consider it appropriate to direct housing to the Coastal Area on flood risk grounds. As previously highlighted the Core Strategy states that the Coastal Commitments exceeded the total amount of housing considered appropriate for the Coastal Area.

Question 8

The CS (para 31, page 28) states that the supply of 8,336 homes (Table A) includes a buffer of approximately 7.3% (568) on top of the housing target of 7,768. Is this buffer sufficient to help ensure delivery of the overall housing target?

39. This has been addressed in relation to Question 2 above and it is disputed that the supply in Table A provides a 7.3% buffer.

Question 10

The Housing Topic Paper states that past 10 year completions average 500/year but that over the 5yr period from 2011 to 2016 some 29% of completions were supported by the Council's Housing Capital programme which is now coming to an end (para 2.21). in this context is a target of 7,768 over the plan lifetime aspirational but also realistic and deliverable?

40. Attached at Appendix 2 to this submission is a table identifying the annual completion rate in the Borough for the last 29 years, together with the relevant annual housing requirement identified in the various Development Plans. This demonstrates that:

- Up until housing completions dropped in 2011 the average completion rate for the preceding 23yrs was 618 dpa. Even taking into account the last 6 years, where the completion rate dropped significantly, the average completion rate since 1988 has been 554 dpa.
- During the 10yr period when there was an up-to-date adopted Local Plan (1991-2001) the average completion rate was 564 dpa.
- Prior to 2011 the annual completion rate had only fallen below 570dpa five times in 23 years.

41. The Council's suggested 7,768 dwelling requirement equates to an average of 518 dpa over the 15yr plan period and the evidence above demonstrates that historically the District has been able to deliver in excess of this.

What is the 5 year Requirement

Question 2

What annual requirement should be used as the baseline to calculate the 5 year requirement? Should it be based on the phased delivery set out in Policy SP3 (2,845), the baseline target of 7,768 divided by 15 years (2,590) or the OAN of 7215 divided by 15 (2,405).

42. Notwithstanding concerns regarding whether the suggested OAN of 481 dpa is sound, it is considered appropriate for the Core Strategy annual housing requirement in SP3 to be adjusted to deliver the shortfall which occurred prior to the start of the plan period. It is also considered appropriate for this to be delivered within the first five years, ala Sedgefield (see Question 5 below), resulting in a higher phased delivery for 2016-2021. With regards to the five year supply, it is considered that the baseline requirement should then be the phased delivery targets, whatever they may eventually be.

Question 3

What is the base date for calculating the housing requirement in the plan and why? Is it 2011 (Box 1 refers to a target of 481/year from 2011-2015) Or the start of the plan period – 2016?

43. This is somewhat unclear and has already been reflected on in relation to Matter 3, but it would appear to be 2011.

Shortfall in Delivery

Question 4

Has there been any shortfall in delivery against the annual requirement since the start of the plan period in 2016 or the base date for the plan in terms of the housing requirement if earlier?

44. The Council's evidence confirms that there were 356 completions in the first year of the plan period (2016/17) and based on the housing requirement figures in policy SP3 this equates to a shortfall of 235 dwellings since the start of the Plan period (591 – 356 = 235).

45. However, the start of the plan period does not appear to reflect the base date of the evidence underpinning the Council's proposed OAN or the planned housing requirement. The actual base date for the housing requirement is somewhat unclear although reference is made in the Council's housing evidence to 2011. If this is the case there has been a 1,085 dwelling shortfall since the start of the housing requirement, i.e. the requirement over this 6yr period based on 481 dpa would be 2,886 dwellings, during which time there have been 1,801 completions. However, Metacre have wider concerns about the manner in which the housing requirement has been calculated.

Question 5

If there has been a shortfall since the relevant base date, should this be recovered over the next 5 years (Sedgefield) or over the lifetime of the plan (Liverpool) and why? What would the resulting 5 year requirement be for 2017-22 and 2018-23 and thereafter?

46. Metacre supports the Council's acceptance that any shortfall should be delivered within five years (Sedgefield). The Sedgefield approach is clearly supported by National policy / guidance, as it seeks to make up the housing shortfall quickly and enable housing delivery to proceed at the rate planned. Indeed PPG states:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible." (PPG ID:3-035)

47. Spreading the shortfall over the entire Plan period (Liverpool) simply compounds past under delivery in direct contrast to significantly boosting the housing supply as required by NPPF 47. The resulting 5 year requirement is addressed in relation to question 8 below.

5% or 20% buffer?

Question 6

Should a buffer of 5 or 20% be added?

48. NPPF 47 requires Local Planning Authorities to identify a supply of 'specific deliverable' sites sufficient to provide five years' worth of housing against their housing requirements, plus a 5% buffer. This increases to 20% where there has been a record of '*persistent under delivery of housing*'

49. NPPF does not specify the period against which to consider the record of housing delivery and there are a number of appeal decisions where Inspectors have concluded that as the NPPF requires an assessment of future housing delivery over a 5 year period it is reasonable to assess past delivery over a similar period of time. However it is also noted that PPG refers to the assessment of the local delivery record being more robust if a longer term view is taken.
50. When considering if there has been an undersupply it is relevant to consider the completion rate against the relevant Development Plan housing requirement. The most recently adopted Development Plan was the East Midlands RSS, which set a housing requirement of 600pda for East Lindsey from 2006. It is acknowledged that the RSS was revoked in 2013 but based on this target the Council have only delivered 76% of the housing requirement in the last 11 years (5,018 dwellings compared to the 6,600 requirement). Furthermore, the RSS requirement of 600 dpa was only met 3 times in this 11 yr period and the District failed to deliver 600 dpa for the last 7 consecutive years.
51. Even if you only apply the RSS figure of 600dpa between 2006 and 2010, followed by the Council's suggested housing requirement of 481 dpa from the apparent base date of 2011 onwards, the Council has still failed to provide its total requirement over this 11 year period (5,018 completions compared to 5,886 requirement) and has still failed to deliver the relevant annual requirement for the last 7 consecutive years.
52. If you look over a shorter timeframe, i.e. the 6yrs from the Council's suggested housing requirement of 481dpa from 2011, the Council has only delivered 64% of its requirement (1,835 dwellings compared to the total requirement of 2,886 dwellings) and has failed to deliver the 481dpa once over this 6yr period.
53. This represents a persistent under delivery where a 20% buffer is appropriate under the terms of NPPF.
54. It is also noted that the Council's 2014 Annual Monitoring Report states:

"In line with the NPPF requirement that local authorities should "identify and update annually a supply of specific, deliverable sites sufficient to provide five years worth of housing against their housing requirements (with an additional

buffer of 5% to ensure choice and competition). This buffer figure is to ensure choice and competition in the market. Furthermore, the NPPF states that where there has been a record of persistent under delivery of housing this buffer should be increased to 20%. To reflect this, the Council has applied a 20% buffer.” (para 9.3)

55. This indicates that in 2014 the Council were acknowledging a 20% buffer was necessary due to a record of persistent under delivery, yet in 2016 and despite two further years of under delivery they now suggest a 5% buffer.

Question 7

The Housing Topic Paper appears to indicate that a 5% buffer should be applied because the under delivery of housing has been caused by a lack of demand? Is this consistent with para 47 of the Framework which seeks a 20% buffer where there has been a persistent under delivery (to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land).

56. The Council provide no robust evidence that the shortfall in delivery is a result of a lack of demand. A contributing factor to the poor delivery is likely to be the absence of an adopted and up-to-date Local Plan and mechanisms to ensure that housing delivery is increased. The adopted Local Plan and its settlement boundaries were adopted over 21 years ago and the Plan was only intended to meet the needs of the District to 2001. Furthermore, the Core Strategy confirms that there is a need for significant greenfield settlement extensions if the development needs of the District are to be met. Accordingly, for a significant number of years there has been a lack of positive, proactive planning to secure adequate housing development, with a heavy reliance on windfall sites to deliver housing in a setting where significant greenfield countryside development is necessary.
57. Notwithstanding the above, and in any event, a slow economic recovery and asserted lack of demand would not be factors that absolve the District from meeting the NPPF's requirements to apply the appropriate contingency buffer and boost significantly the supply of housing. Irrespective of the reasons for the persistent under delivery, the 20% buffer is a response to the fact that delivery has fallen short of the requirement. The point of the 20% buffer is *“to provide a realistic prospect of achieving the planned supply and to ensure choice and*

competition in the market for land" (para 47 NPPF). Regardless of the reasons, there has been a persistent under delivery of housing and the 20% buffer seeks to respond to this by boosting the supply of deliverable sites. There is no suggestion in NPPF 47 that mitigating circumstances can be taken into account. NPPF 47 requires a 20% buffer to be applied where there is a record of persistent under delivery and this has been the case. The 20% buffer is therefore justified. As previously highlighted, up until 2016 the Council were accepting that a 20% buffer should apply.

5 year Requirement Conclusions

Question 8

What would be the 5yr requirement for 2017-22 and for 2018-23, taking account of the recovery of any shortfall and if 5% and 20% are applied.

58. We cannot calculate the 5yr requirement for 2018-2023 as this would need to take into account completions and demolitions between 2017-2018, which as of yet is unknown. However, the 5yr requirement for 2017-22 based on the Council's proposed housing requirement and 5% and 20% scenarios is set out below (assuming for these purposes that the Council's proposed OAN (481 dpa) is correct, which is disputed.)

	5% buffer	20% buffer
Base requirement (2012-2022) (4yr x 591 + 1yr x 481)	2,845	2,845
Shortfall 2016-2017 (591 requirement - 356 completions)	235	235
Adjusted requirement	3,080	3,080
Buffer	154	616
5yr requirement with buffer	3,234	3,696

59. However, if the five year requirement takes into account the shortfall since 2011, which appears to be the base date of the housing evidence underpinning the Council's housing requirement, then the five year requirement would be as follows:

	5% buffer	20% buffer
Base requirement (2017-2022) (5yr x 481)	2,405	2,405
Shortfall 2011-2017 (2,886 requirement – 1,801 completions)	1,085	1,085
Adjusted requirement	3,490	3,490
Buffer	175	698
5yr requirement with buffer	3,665	4,188

60. Metacre still have fundamental concerns regarding the Council's housing requirement which is addressed in other representations.
61. It is understood that these Hearing sessions are not seeking to discuss whether there is a deliverable 5 year supply of housing sites, which is a matter for subsequent Hearing sessions.

APPENDIX 1

Parish	Permission Ref	App type	Outstanding commitments	Expiry Date
COASTAL				
Chapel St Leonards	N/031/0562/14	FUL	2	22.05.14
Ingoldmells	S/090/00476/01	FUL	1	02.05.2006
Mablethorpe	N/110/00735/05	FUL	1	24.04.06
North Somercotes	N/132/01951/06	FUL	4	09.10.06
North Somercotes	N/132/00388/14	FUL	1	09.05.17
North Somercotes	N/132/02468/13	OUT	1	19.06.2017
Saltfleetby	N/145/02488/13	FUL	1	09.04.17
Skegness	S/153/02261/11	FUL	1	31.01.12
Skegness	153/00171/95/	FUL	1	09.03.00
Skegness	S/153/02558/07	RM	1	18.01.10
Skegness	S/153/01480/06	FUL	9	21.08.09
Skegness	s/153/00342/11	RM	1	08.06.13
Skegness	S/153/00367/06	FUL	4	18.04.09
INLAND				
Alford	N/003/01324/07	FUL (appeal)	1	24.6.11
Alford	N/003/01785/13	OUT	2	23.12.16
Bilsby	N/016/00455/14	OUT	1	12.05.17
Binbrook	N/017/00147/14	FUL	1	20.03.17
Coningsby	S/035/01217/07	FUL	35	19.09.10
east barkwith	S/044/01994/09	RM	1	05.10.11
Fulstow	N/056/02389/13	ful	5	09.04.17
Huttoft	N/089/0273/14	OUT	1	16.04.17
horncastle	S/086/01748/05	ful	1	23.09.10
horncastle	S/086/02530/07	FUL	10	28.02.12
LOUTH	n/105/2419/13	ful	1	07.03.2017
LOUTH	n/105/00075/14	out	5	17.03.17
ludford	N/108/00677/14	FUL	1	02.06.17
MANBY	N/113/00391/13	OUT	1	14.05.16
MARSHCHAPEL	n/118/00421/14	ful	1	11.06.2017
stickney	S/169/00017/14	ful	1	28.02.17
stickney	S/169/00469/14	FUL	8	02.05.17
tetney	N/178/01683/14	FUL	1	27.06.17
wainfleet	S/194/00002/14	ful	3	06.03.17
welton le marsh	S/199/00478/02	FUL	1	05.07.07
woodhall spa	S/215/02411/13	out	1	06.02.17
wragby	S/216/01020/13	OUT	100	10.01.17
Total expired units			210	

APPENDIX 2

Appendix 2 – Dwelling Completion Rate

Year	Dwellings completions	Lincolnshire Structure Plan Alteration No.1	Adopted Local Plan	2006 Lincolnshire Structure Plan	2009 East Midlands RSS	East Lindsay suggested OAN
1988/89	1078	785				
1989/90	738	785				
1990/91	746	785				
1991/92	589	785	785			
1992/93	539	785	785			
1993/94	609	785	785			
1994/95	524	785	785			
1995/96	486	785	785			
1996/97	507	785	785			
1997/98	521	785	785			
1998/99	452	785	785			
1999/00	614	785	785			
2000/01	794	785	785			
2001/02	663			520		
2002/03	624			520		
2003/04	487			520		
2004/05	568			520		
2005/06	497			520		
2006/07	619			520	600	
2007/08	732			520	600	
2008/09	578			520	600	
2009/10	681			superseded by RSS	600	
2010/11	573				600	
2011/12	246				600	481
2012/13	240				600	481
2013/14	276				RSS revoked	481
2014/15	278					481
2015/16	405					481
2016/17	356					481

(date of Plan adoption highlighted in yellow)