

Land East of Newgate Lane East, Fareham

Appendix 1 to Proof of Evidence on Housing Need and Supply

On behalf of Miller Homes Ltd and Bargate Homes Ltd

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1. The latest assessment of the LPA

- 1.1. The latest assessment of the LPA namely the Five Year Housing Land Supply Position Statement (5YHLS) was presented to committee on 6th July 2022 (CDH.11). It assesses the 5YLS over the period 1st July 2022 to 30th June 2027 and identifies a **5.01 year land supply** (yls) with a **surplus of 6 homes** based on a five year requirement for 3,246 homes and a supply of 3,252 homes.
- 1.2. I understand that the Council has accepted that it is unable to demonstrate a 5YLS at a recent s78 appeal at Land to the East of Cartwright Drive. For the purposes of the current appeal, in light of the preparation of the Housing Statement of Common Ground (SoCG) the Council now suggests that it is able to demonstrate **a 4.88yls with a shortfall of 81 homes**.

2. Five year housing requirement

- 2.1. Where, as is the case in Fareham, the adopted housing requirement is more than five years' old and has not been reviewed, paragraph 74 of the NPPF requires that the 5YLS is assessed against the minimum local housing need of the standard method.
- 2.2. The LPA has correctly calculated that the standard method provides a minimum local housing need of 541hpa in their latest assessment.
- 2.3. The standard method provides the minimum local housing need at 1st April 2022 as set out in paragraphs 12 and 15 of the HDT Measurement Rule Book (CDD.1). It is therefore necessary to consider whether any shortfall has accrued against this need over the period to the base-date of the LPAs assessment namely 1st July 2022 which would then need to be remedied over the subsequent five years.
- 2.4. It can be calculated from the LPAs current and previous assessment that a total of 18 homes were delivered in the 3 months from April to June¹ in response to the need for 135 homes². This gives rise to an under-delivery of 117 homes against the minimum local housing need within this 3 month period which will need to be addressed over the subsequent five years.

¹ As the outstanding supply from small permitted sites has reduced by 4 homes and the outstanding supply has reduced by 6 homes at Wykeham House School and by 8 homes at 94 Botley Road.

² The annual need for 541 homes divided by 4.

- 2.5. The LPA however take no account of this which provides for an unbalanced assessment because it disregards the shortfall that has accrued prior to the base-date. In effect, the LPA assume that the need for housing will remain constant regardless of the level of delivery during the course of the year, which is illogical. For example, if an LPA had a minimum local housing need for 1,000hpa in April 2022, the LPA would assume that six months later the minimum housing need would remain the same regardless of whether zero, 1,000 or 10,000 homes had been built in that LPA. This is not credible in my opinion.
- 2.6. Once the baseline five year requirement has been established, paragraph 74 of the NPPF requires that a buffer is applied dependent upon the record of delivery as determined by the HDT. As the latest HDT results are below 85%, footnote 41 and paragraph 74 require the application of a 20% buffer.
- 2.7. The resultant respective five year requirements of the parties are set out in Table 2.1 below.

Table 2.1 – the respective five year housing requirements

	The LPA's position	The Appellant's position
Minimum annualised local housing need from 1st April 2022	541	541
Minimum local housing need 1st April to 30th June 2022	135	135
Housing completions 1st April to 30th June 2022	18	18
Shortfall 1st April to 30th June 2022	117	117
Minimum local housing need 1st July 2022 to 30th June 2027 (inc/exc shortfall)	2,705	2,823
Five year requirement including 20% buffer	3,246	3,387

- 2.8. Once the five-year requirement is calculated correctly, the LPA's 4.88y1s with a shortfall of 81 homes reduces to a **4.67y1s with a shortfall of 222 homes**.

3. The definition of a deliverable site

3.1. The NPPF identifies that in order for a site to be deliverable:

“...sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

3.2. The NPPF therefore identifies three pre-conditions which need to be met in order to a site to be considered deliverable, namely that they must be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years.

3.3. The definition then identifies two tests which apply to specified sources of supply to determine whether or not sites are deliverable, namely those in Category A and those in Category B.

3.4. In order for a site to be considered deliverable, it is therefore necessary to meet all three of the pre-conditions and to pass the appropriate test.

3.5. The tests identify that for sites to be considered deliverable, those sites within Category A should be considered to be deliverable unless there is clear evidence that homes will not be delivered within five years (providing the pre-conditions are met), and those within Category B should only be considered deliverable where there is clear evidence that housing completions will begin within five-years (and providing the pre-conditions are met).

3.6. This provides for greater balance in the assessment of the deliverable supply. Under the former NPPF it was permissible to assume that all sites were deliverable if there was a realistic prospect of delivery of each individual site. Taken in combination, such an approach gave rise

to an unrealistic cumulative assessment. For example, where there was a 25% chance of a site delivering this may have been considered a realistic prospect. However, with ten such sites, the chances of them all delivering are less than one in a million. The approach of the former NPPF therefore produced unrealistic cumulative assessments of the deliverable supply in a number of Local Planning Authorities across the country.

- 3.7. The revised definition of deliverability addresses this by providing a much more balanced and realistic assessment of the supply, by identifying that providing the pre-conditions are met, Category A sites should be considered deliverable, but that Category B sites should not be considered deliverable unless there is clear evidence that these will actually achieve housing completions within five years. This is likely to result in the delivery from Category A sites being overestimated but may underestimate the delivery from Category B sites which in the round provides for a more realistic assessment of the overall supply.
- 3.8. The PPG provides guidance as to how this definition should be interpreted and assistance can also be gained by the approach adopted by s78 Inspectors (and in some instances by the courts). I highlight some of the most relevant material considerations in this regard below.

The capacity of sites

- 3.9. The five year requirement represents the net need for additional homes within the next five years. It is therefore appropriate to include the net rather than gross supply of housing within the deliverable supply, including taking account of the loss of homes through demolitions or conversions as set out in the PPG (68-029) which states:

“For the purposes of calculating 5 year land supply, housing completions include new build dwellings, conversions, changes of use and demolitions and redevelopments. Completions should be net figures, so should offset any demolitions.”

- 3.10. Furthermore, the PPG (68-030) is clear that empty homes that are brought back into use should not be included in the supply as these are already part of the existing stock available for use. By the same token, any empty homes that is demolished remains part of the existing stock until it is demolished (or converted) and so should be included as a loss to the supply.
- 3.11. National guidance is also clear that not all forms of accommodation should be treated on a one-for-one basis, including in the PPG (68-035) which states:

“Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. Further guidance is set out in [Housing for Older and Disabled People](#).”

3.12. The link in this paragraph takes one to the PPG (63-016a) which states:

“Plan-making authorities will need to count housing provided for older people against their housing requirement. For residential institutions, to establish the amount of accommodation released in the housing market, authorities should base calculations on the average number of adults living in households, using the published [Census data](#).”

3.13. From this Census data it can be calculated that in Fareham there were an average of 1.88 adults per household. The PPG therefore indicates that every bedspace in an older person’s residential institution equates to 0.53 of a home (=1/1.88).

3.14. Similarly, the PPG (68-034) identifies that communal establishments for students should be included in the supply based on the average number of students living in student only accommodation using published census data. The link in this paragraph of the PPG provides data which suggests that there were an average of 2.26 students living in each unit of student only accommodation. The PPG therefore indicates that every student bedspace equates to 0.44 of a home (=1/2.26).

Sites which post-date the base-date

3.15. The deliverable supply represents a snapshot in time, namely that which existed at the base-date. Accordingly, where the pre-conditions require that a site is available or suitable now, this indicates that a site was required to have been available or suitable at the base-date, namely 1st April 2021. Similarly, where the pre-conditions require that there is a realistic prospect of completions within five-years, this is the five-year period which runs from the base-date of 1st April 2021.

3.16. Any sites which subsequently became suitable or available, or which are capable of delivering within five-years of the subsequent determination of a planning application will respond to a different five-year requirement and cannot be taken into account. To do so would necessitate consideration of the number of completions which had occurred in the interim (which no longer stand a realistic prospect of delivery as they have already been delivered), and the backlog which has accrued in the intervening period. This information has not been provided by the LPA, and so it is not currently possible to adjust the base-date and take

account of any planning permissions which have subsequently been granted (unless these were allocated or subject to outline planning permission at the base date and thereby the suitability of these sites had already been established). The fact that sites which subsequently became available or achievable should not be included in the deliverable supply has been the consistent finding of every s78 appeal decision of which I am aware including for example in paragraph 326 of the Inspectors recommendations to the Secretary of State in the recovered Farleigh Fields appeal decision (CDJ.24)³ which states inter alia:

“It is common ground that it is appropriate to assess supply for the five year period starting from 1 April 2016, however NSC includes sites in its anticipated supply that have been consented since that base date. As the appellant identifies, there is a significant body of appeal decisions in which Inspectors have indicated that such an approach is not appropriate in the absence of proper accounting¹³⁶. I share those Inspectors’ broad view that if such sites are to be included then account must also be taken of the housing requirement that has accrued during the same period. NSC has not factored in that increased requirement or the increased backlog accrued after 1 April 2016, such that there is an imbalance in its inputs and a consequential artificial inflation of its supply of housing land over the five year period in relative terms. Accordingly, all of those sites, which amount to 328 dwellings, should be omitted for the purposes of this exercise.” (emphasis added)

3.17. The Secretary of State agreed in paragraph 18 of the appeal decision that:

“...For the reasons set out by the Inspector at IR325–327, he concludes that 328 units should be removed from supply, reducing the subtotal further to 7,885 (IR326).”

3.18. Every s78 appeal decision of which I am aware has similarly found that this includes sites which were the subject of a resolution to grant planning permission at the base-date, and that accordingly such sites are not to be included in the deliverable supply⁴ including for example, the Secretary of State’s conclusion in paragraph 18 of the recovered appeal decision at Land off Darnhull School Lane, Winsford (CDJ.11) which states:

“The Secretary of State disagrees with the reasons given at IR 365 to 367, and does not consider that the sites, amounting to 222 dwellings, are

³ See also paragraph 58 of the Land at Windacres Farm, Rudgwick appeal decision (CDJ.12), paragraph 47 of the Land off Bakers Lane, Colchester appeal decision (CDJ.13), paragraph 31 of the Entech House, Woolmer Green appeal decision (CDJ.14), paragraph 67 of the Land on East Side of Green Road, Woolpit appeal decision (CDJ.15), paragraph 62 of the Land off Colchester Road, Bures Hamlet appeal decision (CDJ.16) and countless others.

⁴ See for example, paragraph 67 of the Land on East Side of Green Road, Woolpit appeal decision (CDJ.15) and paragraph 62 of the Land off Colchester Road, Bures Hamlet appeal decision (CDJ.16).

deliverable since they do not fall within category a or b of the Framework's definition of deliverable, and he does not consider that there is clear evidence of deliverability within five years as required by the Framework, given the outstanding issues of the need for legal agreements and agreements on reserved matters."

- 3.19. Indeed, Mr Roberts who represents the LPA on 5YLS matters has agreed that such sites should not be included in the deliverable supply in his Proof of Evidence to the appeal at Entech House, Woolmer Green, Welwyn Hatfield (CDJ.14) where he stated inter alia:

"The Council make an allowance for the delivery for 565 dwellings in the five year period from applications awaiting determination (Table 1 of 5YLS Update 31/05/2018, Appendix 22). SPRU have removed these 565 dwellings as these sites do not yet have detailed planning permission and so, by definition, they are considered undeliverable in line with new national planning policy and cannot be included in the supply."

The evidential basis of the assessment of deliverability

- 3.20. In order to consider whether the sites which were available to respond to the housing need at the base-date have a realistic prospect of delivery within five years it is clearly appropriate to take account of the latest evidence, in accordance the PPG (68-004) and the recommendations of the Inspector in paragraph 12.9 of the Land to the East of Newport Road and to the East and West of Cranfield Road, Woburn Sands appeal decision (CDJ.17) which states inter alia:

"However, there is nothing in the NPPF or PPG that stipulates that all of the documentary evidence for a 5 year HLS has to be available at the base date itself. Instead, the PPG advocates the use of the latest available evidence." (emphasis added)

- 3.21. The Secretary of State agreed in paragraph 12 of the appeal decision that:

"...For the reasons given at IR12.8-12.12 the Secretary of State agrees with the Inspector that it is acceptable that the evidence can post-date the base date provided that it is used to support sites identified as deliverable as of 1 April 2019 (IR12.11)."

Sites for housing should offer a suitable location for development now

- 3.22. The PPG (3-018) confirms that a site can be considered to offer a suitable location for development:

"...if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated."

3.23. It continues to state inter alia:

“When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome.”

3.24. Further assistance is provided in paragraph 34iv of the High Court Judgment of *Wainhomes (South West) Holdings Ltd and the Secretary of State for Communities and Local Government et al [2013] EWHC 597 (Admin)* (CDK.2) which states:

“Where sites without planning permission are subject to objection, the nature and substance of the objections may go to the question whether the site offers a suitable location; and they may also determine whether the development is achievable with a realistic prospect that housing will be delivered on the site within five years. Even if detailed information is available about the site and the objections, prediction of the planning outcome is necessarily uncertain. All that probably need be said in most cases is that where sites do not have planning permission and are known to be subject to objections, the outcome cannot be guaranteed. Accordingly, where there is a body of sites which are known to be subject to objections, significant site specific evidence is likely to be required in order to justify a conclusion that 100% of all those sites offer suitable locations and are achievable with a realistic prospect that they will be delivered within five years.” (emphasis added)

3.25. Therefore, it is clear that when considering whether a site offers a suitable location for development it is necessary to have regard to its compliance with the Development Plan, and furthermore, if a planning application is subject to objections that there would need to be “significant site specific evidence” to conclude that the site offers a suitable location⁵.

Sites for housing should be achievable with a realistic prospect that housing will be delivered on the site within five years

3.26. To be included in the deliverable supply, there needs to be a realistic prospect of delivery. This is normally achieved by undertaking a detailed site specific assessment for larger sites which would typically demonstrate that there is not a realistic prospect of every home being delivered within five years, and an aggregated assessment of smaller sites with the application of a proportionate lapse rate or non-implementation rate applied. Without such a lapse or non-implementation rate being applied, it would be assumed that 100% of small

⁵ This accords with the approach adopted by the Inspector in paragraphs 94 and 108 of the Land North East of Becket’s Grove, Wymondham appeal decision (CDJ.18).

sites will be implemented within five years which would be wholly unrealistic. This approach has been supported by numerous Councils and s78 Inspectors⁶ including most recently in paragraphs 78 and 79 of the appeal decision at Land North East of Becket's Grove, Wymondham (CDJ.18) which states:

"At the Hearing there was discussion around the inclusion of sites where planning permission was granted some time ago, yet those sites remain on the list. The Council explained that the list would include sites where permission had been implemented, but had not yet been completed, but accepted that some sites which have started may not be built out, just as some extant permissions will never be implemented. The Council has applied a "lapse rate" of 27% to allow for such losses and provides, in the appendices to the Joint Core Strategy for Broadland, Norwich and South Norfolk: Annual Monitoring Report 2018-19-2020 the basis for this assumption.

The figure has been calculated from historic figures for non-delivery or completion, again over a 10 year period, taking the higher rate for the three Councils whose administrative areas contribute to the Greater Norwich Area, to provide a more conservative figure. I consider this method sufficiently robust as to give confidence in the Council's figure for anticipated completions and the number of dwellings to be provided by small sites should be retained. (emphasis added)

Clear Evidence

- 3.27. The definition of the NPPF identifies that Category B sites should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 3.28. In my view, the use of the word 'will' within the test for Category B sites requires a higher degree of confidence of delivery than within required in the previous NPPF (prior to 2018) which only required that there was a realistic prospect of delivery.
- 3.29. Numerous respondents to the consultation on the draft NPPF identified that the new definition sets a presumption against the deliverability of such sites and that these should only be considered deliverable as an exception. The Planning Officers Society identified that:

"The proposed change would mean that rather than needing to show that there is a reasonable prospect that delivery on sites can happen, LPAs would

⁶ See for example paragraph 48 of the Land at Caddywell Lane/Burwood Lane, Great Torrington appeal decision (CDJ.19), and paragraph 77 of the Land adjacent to the north side of Natland Mill Beck Lane appeal decision (CDJ.20).

be required to demonstrate somehow that it definitely will happen. This would be beyond an LPA's control, since only landowners or developers could give the answer, and even then, in many cases they could only indicate their intention or expectation, not say that it will definitely happen." (my emphasis)

3.30. Similarly, the Local Government Association identified that:

"The revised definition of 'deliverable' sets an unfairly high test on local planning authorities for sites which do not have a detailed planning permission in place (including sites that have been allocated and subject to a separate examination through the plan-making process), requiring "clear evidence that housing completions will (our emphasis) begin on site within five years". Placing the onus on local planning authorities to do this for each site is unreasonable, and in many cases impossible to do, as sites with outline planning permissions, will often be subject to ownership transactions and revised options for delivery before a final construction programme can be drawn up.

This change in definition would in effect mean, that only sites with detailed planning permissions could make up a five year supply picture, and risks local planning authorities being challenged on existing site allocations in local plans based on this new definition." (my emphasis)

3.31. Whilst I do not go as far as these consultees, I agree that the threshold for a Category B site to be included in the deliverable supply has been considerably raised.

3.32. The PPG (68-007) requires that robust, up to date evidence needs to be available. A number of appeal decisions⁷ have interpreted this to require that there needs to be something cogent to provide strong evidence that in reality a site will deliver housing in the timescale and in the numbers contended for, rather than relying upon mere assertion.

3.33. The PPG (68-007) also provides a non-exhaustive list of examples of evidence that may contribute towards providing the necessary clear evidence. The examples provided include:

- i. Evidence of progress towards approving reserved matters;
- ii. A planning performance agreement that sets out the timescale for the approval of reserved matters and the discharge of conditions;

⁷ See for example paragraph 56 of the Land at Caddywell Lane/Burwood Lane, Great Torrington appeal decision (CDJ.19) and paragraph 20 of the Little Sparrows, Sonning Common appeal decision (CDJ.22).

- iii. A written agreement between the LPA and the developers which confirms the developer's delivery intentions and anticipated start and build-out rates;
- iv. Evidence of firm progress towards site assessment work; and
- v. Clear relevant evidence about site viability, ownership constraints or infrastructure provision.

3.34. In general, and in accordance with the PPG, as a minimum, Inspectors and the Secretary of State have found that something akin to a written agreement or the submission of a reserved matters application is likely to be necessary to provide clear evidence. For example, in paragraph 21 of the Land off Audlem Road/Broad Lane, Stapeley recovered appeal decision (CDJ.21), the Secretary of State concluded that:

"He considers that, on the basis of the evidence before him, the following should be removed from the supply: sites with outline planning permission which had no reserved matters applications and no evidence of a written agreement; a site where there is no application and the written agreement indicates an application submission date of August 2019 which has not been forthcoming, with no other evidence of progress; and a site where the agent in control of the site disputes deliverability." (emphasis added)

3.35. In this paragraph, the Secretary of State also clearly identifies that where the milestones identified in any evidence have not been achieved, the evidence should no longer be relied upon as providing clear evidence.

3.36. The content and realism of any such written agreement will also be material to whether or not there is the clear evidence envisaged by the NPPF. For example, in paragraph 23 of the Land off Popes Lane, Sturry appeal decision (CDJ.23) states inter alia:

"For a number of the disputed sites, the Council's evidence is founded on site specific SCGs which have been agreed with the developer or landowner of the site in question. I appreciate that the PPG refers to SCGs as an admissible type of evidence, and I have had full regard to that advice. But nevertheless, the evidential value of any particular SCG in this context is dependent on its content. In a number of cases, the SCGs produced by the Council primarily record the developer's or landowner's stated intentions. Without any further detail, as to the means by which infrastructure requirements or other likely obstacles are to be overcome, and the timescales involved, this type of SCG does not seem to me to demonstrate that the development prospect is realistic. In addition, most of the site-specific SCGs are undated, thus leaving some uncertainty as to whether they represent the most up-to-date position." (emphasis added)



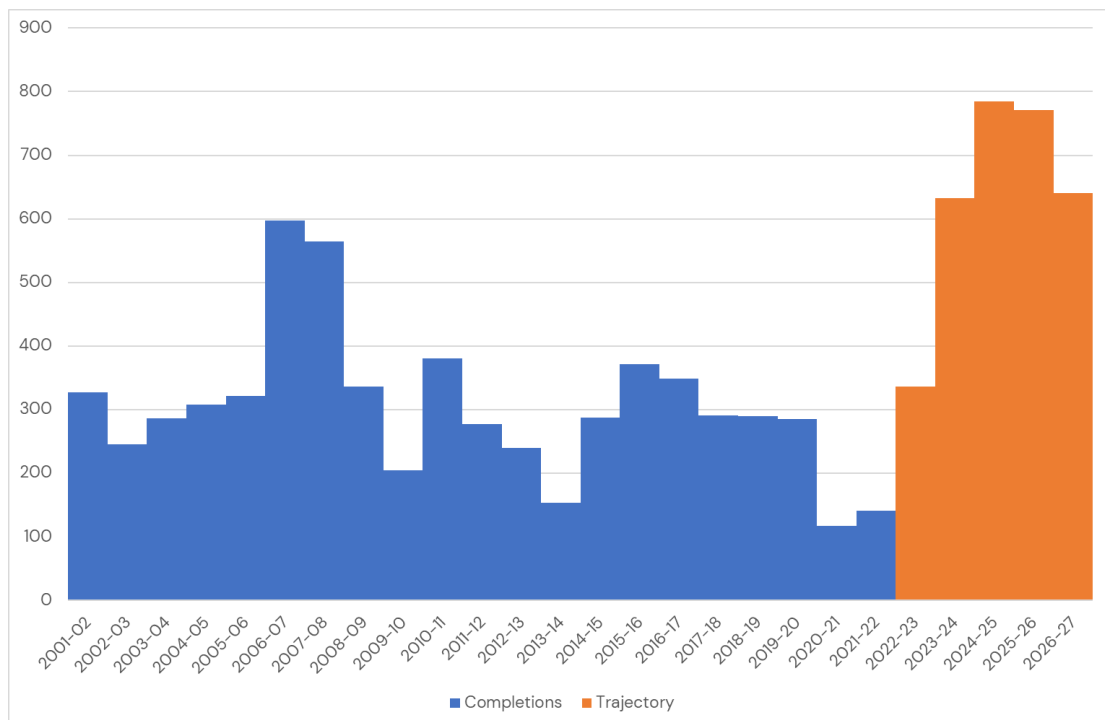
3.37. Similarly, paragraph 57 of the Land at Caddywell Lane/Burwood Lane, Great Torrington appeal decision (CDJ.19) states:

“Clear evidence requires more than just being informed by landowners, agents or developers that sites will come forward, rather, that a realistic assessment of the factors concerning the delivery has been considered. This means not only are the planning matters that need to be considered but also the technical, legal and commercial/financial aspects of delivery assessed. Securing an email or completed pro-forma from a developer or agent does not in itself constitute ‘clear evidence’. Developers are financially incentivised to reduce competition (supply) and this can be achieved by optimistically forecasting delivery of housing from their own site and consequentially remove the need for other sites to come forward.”
(emphasis added)

4. Deliverable supply context

4.1. This supply of 3,252 homes identified by the LPA in the 5YHLSPS (CDH.11) requires that more homes are delivered on average in each of the five years than has ever been achieved in a single year previously as illustrated in Figure 4.1 below⁸. This immediately suggests that the LPA’s trajectory will be extremely challenging to deliver.

Figure 4.1 – the trajectory of the LPA



4.2. The LPA has published 5YLS assessments for a number of years. It is useful to consider whether the trajectories identified in these previous assessments have been realistic as this provides an indication of the likely realism of the LPA’s current assessment. This analysis is therefore set out in Table 4.2 below and this demonstrates that every one of the LPA’s trajectories have over-estimated the deliverable supply by between 35% and 61% over a four or five year period. Indeed, the previous trajectories of the LPA have only been achieved in 2 of the 36 years for which a trajectory is available.

⁸ The deliverable supply of 3,165 homes now contended for by the LPA similarly requires average delivery rates of 633hpa in each of the next five years, which is in excess of the greatest level of completions previously achieved in a single year.

Table 4.2 – the accuracy of previous trajectories

	Year 1	Year 2	Year 3	Year 4	Year 5
December 2017 5YLS trajectory	389	402	243	359	335
Completions	291	290	285	117	141
Annualised accuracy	-25%	-28%	17%	-67%	-58%
Cumulative accuracy	-25%	-27%	-16%	-29%	-35%
March 2018 5YLS trajectory	389	395	313	514	486
Completions	291	290	285	117	141
Annualised accuracy	-25%	-27%	-9%	-77%	-71%
Cumulative accuracy	-25%	-26%	-21%	-39%	-46%
June 2018 5YLS trajectory	412	403	515	546	-
Completions	290	285	117	141	-
Annualised accuracy	-30%	-29%	-77%	-74%	-
Cumulative accuracy	-30%	-29%	-48%	-56%	-
September 2018 5YLS trajectory	391	502	563	546	-
Completions	290	285	117	141	-
Annualised accuracy	-26%	-43%	-79%	-74%	-
Cumulative accuracy	-26%	-36%	-52%	-58%	-
October 2018 5YLS trajectory	391	502	563	593	-
Completions	290	285	117	141	-
Annualised accuracy	-26%	-43%	-79%	-76%	-
Cumulative accuracy	-26%	-36%	-52%	-59%	-
December 2018 5YLS trajectory	391	502	563	593	-
Completions	290	285	117	141	-
Annualised accuracy	-26%	-43%	-79%	-76%	-
Cumulative accuracy	-26%	-36%	-52%	-59%	-
January 2019 5YLS trajectory	327	509	622	651	-
Completions	290	285	117	141	-
Annualised accuracy	-11%	-44%	-81%	-78%	-
Cumulative accuracy	-11%	-31%	-53%	-61%	-
April 2019 5YLS trajectory	263	495	788	-	-
Completions	285	117	141	-	-
Annualised accuracy	8%	-76%	-82%	-	-
Cumulative accuracy	8%	-47%	-65%	-	-
June 2020 5YLS trajectory	132	249	-	-	-
Completions	117	141	-	-	-
Annualised accuracy	-11%	-43%	-	-	-
Cumulative accuracy	-11%	-32%	-	-	-
February 2021 5YLS trajectory	214	-	-	-	-
Completions	141	-	-	-	-
Annualised accuracy	-34%	-	-	-	-
Cumulative accuracy	-34%	-	-	-	-

- 4.3. This clearly demonstrates that the methodology employed by the LPA to calculate the deliverable supply produces unrealistic outcomes. Therefore, not only will the trajectory of the LPA be incredibly challenging to achieve this has been generated using a methodology which produces unrealistic results. Indeed, even assuming that the current trajectory

replicated the greatest level of accuracy ever achieved in a previous trajectory⁹, with an over-estimate of 35%, then the supply of the LPA would reduce to 2,410 homes (which would equate to a 3.56yrs).

4.4. In this context, it is perhaps unsurprising that those Inspectors that have interrogated the positions of the LPA have repeatedly found that the deliverable supply identified by the LPA is over-stated including for example in:

- Paragraph 91 of the appeal decisions at Land at Newgate Lane (North) and (South)¹⁰ (CDJ.7) where Inspector Jenkins found that:

“Based on the evidence before me, I consider that the Council’s expectations of delivery are likely to be unrealistic, and the actual housing land supply position is likely to be closer to the appellant’s estimate [of 0.97 years] than the Council’s [of 3.4 years].”

- Paragraph 23 of the appeal decision at Rear of 77 Burr ridge Road, Burr ridge (CDJ.5) where Inspector Parker found that:

“The information before me does not enable me to reach a definitive figure for the current housing land supply position, but the probability is that it is significantly below that published by the Council [of 4.66 years], and much closer to that advanced by the appellant [of 2 years or below].”

- Paragraph 90 of the appeal decision at Land to the east of Downend Road, Portchester (CDJ.3) where Inspector Gould found that:

“I therefore consider that the Council’s claimed 4.66 years HLS position is too optimistic and the appellant’s figure of 2.4 years better represents the current situation.”

4.5. In summary, the previous trajectories of the LPA have proved to be demonstrably unrealistic by a significant margin, s78 Inspectors have consistently found this to be the case and there is no reason to believe that the current trajectory will be any different. This is especially so, when the current trajectory of the LPA requires the delivery of a significantly greater number of homes in every year than have ever been achieved in a single year previously.

⁹ Covering 4 years or more.

¹⁰ At which I acted as expert witness on behalf of the Appellants.

5. The components of the deliverable supply

5.1. The LPA identified a supply of 3,252 homes in the 5YHLSPS which at the base-date comprised:

- i. 1,266 homes in Category A including:
 - 70 homes on small permitted sites;
 - 1,184 homes on large sites with detailed planning permission;
 - 12 homes on large sites with outline planning permission for non-major development;
- ii. 1,678 homes in Category B including:
 - 1,375 homes on sites which involve major development and have outline planning permission;
 - 111 homes on allocated sites without planning permission¹¹;
 - 192 homes on sites identified on the Brownfield Land Register;
- iii. 208 homes on unallocated sites subject to undetermined planning applications¹² outside of both Category A and Category B; and
- iv. A windfall allowance of 100 homes.

5.2. Each of these is considered in turn below, taking account of the LPA's subsequent concessions.

¹¹ Including 41 homes on sites identified as such in the LPA's assessment and 70 homes at Heath Road, Locks Heath.

¹² Including 137 homes at Land at Brook Lane, 39 homes at Robann Park, and 32 homes at Rookery Avenue.

Category A sites

- 5.3. Category A sites should be considered deliverable providing they offer a suitable location for the development proposed now, they are available now and there is a realistic prospect of delivery. These sites should be considered deliverable until permission expires unless there is clear evidence that they will not deliver.

Outstanding planning permissions – small (1-4 homes)

- 5.4. The LPA identify a supply of 70 homes from this source. This arises from a supply of 77 homes with a discount of 10% applied in recognition of the fact that there is not a realistic prospect of 10% of such sites being developed within five-years. Indeed, it is not uncommon for planning applications on small sites to be submitted by landowners without any intent of delivery including owing to the financial incentive of securing planning permission, or for such applications to be progressed in the absence of a housebuilder. As such, the implementation rate on small sites is consistently significantly below that achieved on medium or large sites which are typically progressed by experienced housebuilders with an intent of delivery.
- 5.5. There is however no evidence or justification for the 10% non-implementation allowance assumed by the LPA.
- 5.6. During my time at Wiltshire Council and Wiltshire County Council I undertook detailed analysis of the proportion of small permitted sites which are implemented within five years in that LPA, which found that 32% of homes on such sites were not delivered in a five year period. I have also seen the detailed evidence which has considered the implementation rates in other LPAs during my time with Pegasus Group, and these have consistently identified that somewhere between 22% and 33% of small permitted sites¹³ will not be implemented within five years. Accordingly, the 10% non-implementation rate assumed by the LPA is not realistic by reference to what has occurred in other LPAs and there is no reason to assume that the situation will be markedly different in this LPA.
- 5.7. I therefore consider that it would be unrealistic and highly optimistic to assume a non-implementation rate of any less than 22%. Whilst this difference is unlikely to be significant,

¹³ Including for example 22% in Cheltenham, Tewkesbury and Stroud, 23% on Gloucester, 27% in South Norfolk and 33% in Arun.

this alone would **reduce the deliverable supply of the LPA by 10 homes**, which alone would be more than sufficient to result in the LPA being unable to demonstrate a 5YLS.

5.8. The respective positions on the supply from small permitted sites is set out in Table 5.1 below.

Table 5.1 – the respective positions on the supply from small permitted sites

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
Small permitted sites	The 5YHLSPS	21	23	26	-	-	-	70
	The LPA updated	21	23	26	-	-	-	70
	The Appellant	20	20	20	-	-	-	60

Outstanding full planning permissions – large (5+ homes)

5.9. The LPA identify a supply of 1,184 homes from such sites. These should be considered deliverable providing they meet the three pre-conditions and there is no clear evidence to the contrary. As such the contribution from the overwhelming majority of such sites is accepted, with a small number of exceptions, namely those where the capacity has been misrecorded, and those for which there is no realistic prospect of delivery as briefly summarised below.

5.10. On the following sites the LPA has misrecorded the capacity and the deliverable supply should be reduced accordingly:

- i. 68 Titchfield Park Road (P/20/1137/FP) – this site benefits from full planning permission for the conversion and extension of a former care home (including the loss of 6 bedspaces which would equate to 3 homes¹⁴) to provide 9 flats, which provides a net increase of the equivalent of 6 homes rather than 9 homes as included in the deliverable supply of the LPA. It is therefore necessary to **reduce the supply by 3**

¹⁴ Using the ratios identified in the PPG.

homes. The Council accept this on page 3 of their response to representations on the revised housing topic paper (CDF.12).

- ii. Phase 1, 69 Botley Road (P/19/O643/FP) – this site benefits from full planning permission for the development of 12 homes following the demolition of the existing home, which provides for a net increase of 11 homes rather than 12 homes as included in the deliverable supply of the LPA. It is therefore necessary to **reduce the supply by 1 home**. The Council accept this on page 3 of their response to representations on the revised housing topic paper (CDF.12).
- iii. 195–205 Segensworth Road (P/21/1257/FP) – this site benefits from full planning permission for the demolition of 1 home and the erection of 8 bungalows, which provides for a net increase of 7 homes rather than 8 homes as included in the deliverable supply of the LPA. It is therefore necessary to **reduce the supply by 1 home**. The Council accept this on page 3 of their response to representations on the revised housing topic paper (CDF.12).
- iv. Hammond Industrial Estate (P/20/1597/FP) – this site benefits from full planning permission for the demolition of existing buildings (including 3 homes) and the erection of a 68-bed care home (which equates to 36 homes¹⁵), which provides for a net increase of 33 homes rather than 36 as included in the deliverable supply of the LPA. It is therefore necessary to **reduce the supply by 3 homes**. The Council accept this on page 4 of their response to representations on the revised housing topic paper (CDF.12).

5.11. In totality, once the capacity of sites with full planning permission is correctly recorded, the supply of the LPA reduces by 8 homes. This alone would again be more than sufficient for the LPA to be unable to demonstrate a 5YLS.

5.12. The LPA also include one site in the deliverable supply for which it is not considered there is a realistic prospect of delivery as follows:

- i. 24 West Street, Fareham (P/19/O654/PC) – this site gained prior approval for the change of use of B1 offices to 7 C3 dwellinghouses on 14th August 2019. The conditions

¹⁵ Using the ratio of the PPG.

for the approval require that the development proposed must be completed within three years (i.e. by 14th August 2022). However, development has not even commenced and so planning permission has expired. This **reduces the supply of the LPA by 7 homes**¹⁶. The LPA has once again conceded this site.

5.13. In summary, the parties are now in agreement on the contribution from such sites. The respective positions on the supply from large sites with full planning permission is set out in Table 5.2 below.

Table 5.2 – the respective positions on the supply from large sites with planning permission¹⁷

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
68 Titchfield Park Road	<i>The 5YHLSPS</i>	9	-	-	-	-	-	9
	<i>The LPA updated</i>	6	-	-	-	-	-	6
	<i>The Appellant</i>	6	-	-	-	-	-	6
Phase 1, 69 Botley Road	<i>The 5YHLSPS</i>	12	-	-	-	-	-	12
	<i>The LPA updated</i>	11	-	-	-	-	-	11
	<i>The Appellant</i>	11	-	-	-	-	-	11
195-205 Segensworth Road	<i>The 5YHLSPS</i>	-	8	-	-	-	-	8
	<i>The LPA updated</i>	-	7	-	-	-	-	7
	<i>The Appellant</i>	-	7	-	-	-	-	7
Hammond Industrial Estate	<i>The 5YHLSPS</i>	-	36	-	-	-	-	36
	<i>The LPA updated</i>							
	<i>The Appellant</i>	-	33	-	-	-	-	33
24 West Street	<i>The 5YHLSPS</i>	-	7	-	-	-	-	7
	<i>The LPA updated</i>	-	0	-	-	-	-	0
	<i>The Appellant</i>	-	0	-	-	-	-	0
Uncontested sites	<i>The 5YHLSPS</i>	257	349	246	151	96	13	1,112
	<i>The LPA updated</i>	257	349	246	151	96	13	1,112
	<i>The Appellant</i>	257	349	246	151	96	13	1,112
Total	<i>The 5YHLSPS</i>	278	400	246	151	96	13	1,184
	<i>The LPA updated</i>	274	389	246	151	96	13	1,169
	<i>The Appellant</i>	274	389	246	151	96	13	1,169

¹⁶ Which alone would once again be sufficient for the LPA to be unable to demonstrate a 5YLS.

¹⁷ In this and subsequent tables where the supply is agreed this is italicised, and where the supply is not agreed this is emboldened.

Outstanding outline planning permissions for non-major development – large (5+ homes)

5.14. The LPA identify a supply of 12 homes arising from such sites. The contribution from these sites is agreed and is set out in Table 5.3 below.

Table 5.3 – the respective positions on the supply from large sites with outline planning permission for non-major development

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
Total	<i>The 5YHLSPS</i>	-	-	12	-	-	-	12
	<i>The LPA updated</i>	-	-	12	-	-	-	12
	<i>The Appellant</i>	-	-	12	-	-	-	12

Category B sites

- 5.15. Category B sites should only be considered deliverable where they offer a suitable location for the development proposed now, they are available now, there is a realistic prospect of delivery within five years and there is clear evidence that completions will be achieved on-site within five years.
- 5.16. The PPG (68-014) sets out that any such clear evidence is expected to be included in the published assessment and this has been confirmed in paragraph 63 of the appeal decision at Land off Colchester Road, Bures Hamlet (CDJ.16). No such evidence has been provided in the LPA's published assessment. In the absence of the necessary clear evidence being publicly available, I had requested the evidence upon which the LPA rely on 12th August 2022, but at the time of writing this Proof of Evidence, no evidence whatsoever has been forthcoming from the LPA.
- 5.17. The fact that the LPA has not provided clear evidence in support of Category B sites and as such these cannot be considered deliverable is consistent with the findings of Inspector Parker in paragraph 23 of the appeal decision at Rear of 77 Burrigge Road which identify that the LPA:

"...has not provided the clear evidence sought by the Framework..."

- 5.18. In the absence of such clear evidence, the NPPF identifies that the Category B sites should not be regarded as being deliverable¹⁸. I have nevertheless reviewed the position on each of these sites to consider whether notwithstanding the absence of the necessary clear evidence from the LPA, they should be considered deliverable.
- 5.19. It may however now be suggested by the LPA that the Inspector examining the LPR has considered the deliverability of sites and in the absence of any suggestion to the opposite in the post-hearings letter it can be assumed that the Inspector is satisfied that there is sufficient evidence to conclude that the Category B sites are deliverable. However, any such suggestion would be misplaced including because:
- i. Participants were provided the opportunity to submit hearing statements to address the assessment of deliverability of December 2021 (FBC001) in February 2022 which

¹⁸ This would reduce the supply of the LPA by 1,678 homes.



assessed the deliverability of sites, some of which were different, over the period 2021-26 rather than the current five year period;

- ii. Participants, including Pegasus Group on behalf of the Appellant, did not consider it appropriate to undertake a detailed assessment of the deliverable supply at this point in time owing to the fact that the existence (or otherwise) of a 5YLS at the point of adoption would be largely dependent upon the stepped housing requirement and so until this issue has been concluded upon it would have been a redundant exercise to undertake such a detailed assessment;
- iii. The LPA then published a new assessment of deliverability in March 2022¹⁹ (FBC064) shortly before the hearing session on housing supply was convened and so there was no opportunity for participants to prepare the necessary detailed evidence to respond to this;
- iv. The Inspector in paragraph 4 of her post-hearings letter confirms that she does not address all of the issues. Indeed, the Inspector recognises in paragraph 58 of this letter that subsequent evidence is likely to have implications for the stepped housing requirement. As such it would have been a fruitless exercise to consider the deliverability of sites, as the Inspector still would not have been able to conclude upon the potential demonstration of a 5YLS at the point of adoption in the absence of a conclusion on the stepped housing requirement;
- v. The LPA has now published yet another assessment of deliverability (in the Housing Supply Topic Paper). The Inspector has requested a focussed consultation on the Housing Supply Topic Paper (which reflects the current trajectory of the LPA) and until the resultant representations have been considered and concluded upon, it would not be possible for the examining Inspector to have concluded on the deliverability (or otherwise) of these sites.

5.20. Therefore, in summary, not only has the examining Inspector reached no conclusion on the deliverability of Category B sites, but she has not even considered the latest assessment which the LPA rely upon for the purpose of this appeal, and participants have not submitted

¹⁹ Which again considered deliverability over the period 2021-26 rather than across the current five year period.

detailed evidence to address this issue. No reliance can therefore be placed on the absence of any explicit finding from the Inspector that the Category B sites are not deliverable. As such, I proceed to consider the deliverability of such sites below.

Outstanding planning permissions – large (5+ homes)

5.21. The LPA identify a supply of 1,375 homes on 12 such sites. Eleven of these are considered briefly below and then Welborne is addressed in more detail subsequently:

- i. Land South of Funtley Road, Funtley (P/18/0067/OA) – this site gained outline planning permission for the development of up to 55 homes in September 2020. However, this scheme was not progressed by the applicant but instead an alternative scheme was proposed for up to 125 homes. This alternative scheme gained outline planning permission at appeal in May 2022. The evidence presented by the Appellant to this appeal clearly identified that the site will contribute 125 homes to the deliverable supply.
- ii. Land to the East of Brook Lane, Warsash (P/17/0752/OA) – this site gained outline planning permission for up to 140 homes in February 2021 of which 76 benefit from reserved matters approval and are included in Category A above, leaving a residual capacity for up to 64 homes on the remainder of the site which the LPA include in the deliverable supply. An application for reserved matters for 42 homes rather than 64 homes has gained a resolution to grant planning permission on the remainder of the site. Accordingly, the supply of the LPA should be **reduced by 22 homes**. I understand the LPA accepted this at the recent Land to the East of Cartwright Drive appeal.
- iii. Land adjacent to 125 Greenaway Lane (P/19/0402/OA) – this site gained outline planning permission for up to 100 homes in April 2021. An application for the approval of reserved matters for 80 homes covering the entire site is currently being determined by the LPA. Accordingly, the supply of the LPA should be **reduced by 20 homes**. I understand the LPA accepted this at the recent Land to the East of Cartwright Drive appeal.
- iv. East & West of 79 Greenaway Lane, Warsash (P/18/0107/OA) – this site gained outline planning permission for up to 30 homes in January 2021 of which 6 benefit from reserved matters approval and are included in Category A above, leaving a residual capacity for up to 24 homes on the remainder of the site. There are no applications for

the approval of reserved matters although there is a full planning application for 6 homes across the remainder of the site. Whilst a full planning application does not of itself provide clear evidence, given the limited objections to the current application, I consider that this site can be considered deliverable for 6 rather than 24 homes, such that the supply of the LPA should be **reduced by 18 homes**. I understand that this is accepted by the LPA and this is reflected in the Statement of Common Ground..

- v. 3-33 West Street, Portchester (P/19/1040/OA) – this site gained outline planning permission for additional storeys on the existing building to provide 26 apartments in June 2021. There have not been any applications to discharge conditions or for the approval of reserved matters on this site in the subsequent year. As with the preceding site, I have been unable to identify evidence, let alone clear evidence, that completions will be achieved on this site within five years. As such, this site should not be considered deliverable, and the supply **reduced by 26 homes** in accordance with the approach of the Secretary of State in paragraph 21 of the Stapeley appeal decision.
- vi. Land East of Newgate Lane East (P19/1260/OA) – this site gained outline planning permission for the erection of up to 99 homes at appeal in July 2021. An application for the approval of reserved matters for 96 homes covering the entire site is currently being determined by the LPA. Accordingly, the supply of the LPA should be **reduced by 3 homes**. I understand the LPA accepted this at the recent Land to the East of Cartwright Drive appeal.
- vii. Land at 18 Titchfield Park Road (P/20/O235/OA) – this site gained outline planning permission for the demolition of an existing home and the erection of 6 homes on a site of 1.1ha in July 2021. There have been no applications to discharge conditions or for the approval of reserved matters and I have been unable to identify any evidence, let alone clear evidence, that completions will be achieved within five years. Accordingly, the supply of the LPA should be **reduced by 6 homes** in accordance with the approach of the Secretary of State in paragraph 21 of the Stapeley appeal decision but even if clear evidence was available the supply should be reduced by 1 home to take account of the demolition. The Council accept that the supply should be reduced by 1 home on page 4 of their response to representations on the revised housing topic paper (CDF.12).

- viii. Downend Road East, Portchester (P/20/0912/OA) – this site gained outline planning permission for a mixed-use development including up to 350 homes at appeal in October 2021. Two applications for the approval of reserved matters have been submitted, for Phase 1 including 180 homes in December 2021 and for Phase 2 including 170 homes in June 2022. Whilst these applications are the subject of objections, these are not considered to be significant and are capable of being resolved rapidly. The developer has also provided clear evidence to the examination of the LPR which supports the trajectory of the LPA. In light of this, for the purposes of this appeal, the contribution of this site to the deliverable supply is not contested. However, it should be acknowledged that in the continued absence of the approval of the reserved matters applications the trajectory appears increasingly optimistic and will not be achieved unless reserved matters are approved forthwith.
- ix. Land between and to the rear of 56–66 Greenaway Lane, Warsash (P/18/0756/OA) – this site gained outline planning permission for up to 28 homes at appeal in December 2021²⁰. Whilst the evidence to this appeal on behalf of the Appellant identified that there are no constraints to the early development of the site, it did not provide anything approaching clear evidence that completions would be achieved within five years as required by the NPPF. Subsequent to the appeal decision there have been no applications to discharge planning conditions or for the approval of reserved matters and I have been unable to identify any clear evidence that completions will be achieved. Accordingly, on the basis of the available evidence this site should not be considered deliverable, and the supply **reduced by 28 homes**.
- x. Land East of Posbrook Lane (P/19/1193/OA) – this site gained outline planning permission for up to 57 homes at appeal in February 2022. As with the preceding site, there have been no applications to discharge conditions or for the approval of reserved matters and I have not been able to identify any clear evidence that completions will be achieved within five years²¹. Accordingly, on the basis of the available evidence this site should not be considered deliverable, and the supply **reduced by 57 homes** in

²⁰ At which a full award of costs against the LPA was granted.

²¹ Noting that in support of the appeal the Appellant relied upon the track record of the developer and the absence of constraints to suggest that the site could be expected to deliver, neither of which provide clear evidence that completions will be achieved on this site.



accordance with the approach of the Secretary of State in paragraph 21 of the Stapeley appeal decision.

- xi. Eyersdown Farm, Burridge (P/20/0506/OA) – this site gained outline planning permission for the erection of up to 38 homes at appeal in June 2022. The Appellant did not present any evidence to demonstrate that this site would deliver within five years and I have been unable to identify any such evidence. Accordingly, on the basis of the available evidence this site should not be considered deliverable, and the supply **reduced by 38 homes** in accordance with the approach of the Secretary of State in paragraph 21 of the Stapeley appeal decision.

Welborne

- 5.22. The North Fareham Strategic Development Area (now known as Welborne) was originally conceived in the subsequently revoked South East Plan to address sub-regional housing requirements between 2016–26. The supply from this site was separated from the supply arising from other sites in Fareham recognising that it responded to sub-regional needs rather than the needs of Fareham as recognised in paragraph 7 of the Inspector’s Final Report on the Core Strategy (CDE.3).
- 5.23. Following the revocation of the South East Plan, Welborne was progressed through the Welborne Plan which was adopted in June 2015 on the consistent basis that it addressed sub-regional rather than local needs as referenced in paragraph 13 of the Inspector’s Final Report on the Welborne Plan (CDE.5).
- 5.24. An outline planning application for the development of a mixed-use development including up to 6,000 homes was then submitted in March 2017, and eventually determined favourably in September 2021. Conditions 15, 57 and 71²² have subsequently been discharged, and two applications for the approval of reserved matters for strategic enabling works were submitted on 16th June 2022 and on 14th July 2022.
- 5.25. Numerous trajectories for the development of this site have been provided by the site promoter over recent years, each of which has set out trajectories that were unrealistic at the time they were prepared, and which have proved to be demonstrably so. For example,

²² Rather strangely the promoter also submitted an application to discharge condition 56 responding to condition 57, which the LPA subsequently discharged.

the latest trajectory assumed that 450 completions would have been achieved by the end of this year (including 210 by the end of last year) and yet this site does not yet even benefit from a residential application for the approval of reserved matters. This is illustrated in Table 5.4 below. This consistent unrealism must necessarily bear upon the weight afforded to any trajectory provided by the site promoter.

Table 5.4 – the previous cumulative trajectories for Welborne

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
The Welborne Plan, 2015	120	300	500	820	1160	1500	1840
Delivery Plan, March 2017	0	0	120	300	500	820	1160
Delivery Plan, December 2018	0	0	0	0	30	210	450
Delivery Plan, March 2019	0	0	0	0	30	210	450

5.26. Notwithstanding the unrealism of every previous trajectory, the LPA unrealistically suggested to the examining Inspector that this site would deliver the first completions in 2023/24 on the basis that:

- i. a site wide design code would be submitted (as required by condition 9 of the outline planning permission) in May 2022 as recorded in paragraph 24;
- ii. applications for the approval of reserved matters for strategic enabling infrastructure would be submitted in May 2022 as recorded in paragraph 24;
- iii. housebuilders would be selected in May 2022 as recorded in paragraph 25;
- iv. reserved matters applications for initial phases would be submitted in summer/August 2022 as recorded in paragraph 25.

5.27. However, further evidence has become available which indicates that there have already been delays. It is now apparent that:

- i. there has been no application for the discharge of condition 9 (the Strategic Design Code) as was assumed would be submitted in May 2022 by the LPA and paragraph 9 of the Welborne Delivery Update of 27th July 2022 now suggests that this will be submitted in the next few months;

- ii. the latest application for the approval of strategic enabling infrastructure works was submitted in July 2022 rather than May 2022 as assumed by the LPA. Both of the extant applications remain undetermined and there may yet be further applications;
- iii. housebuilders do not appear to have been selected as was assumed would be achieved in May 2022; and
- iv. there have not been any applications for the approval of reserved matters for initial phases as was assumed would be the case in the summer/August of 2022 and the Welborne Delivery Update now suggests that these will be submitted at some unspecified time within 2022.

5.28. Accordingly, the position of the LPA as submitted to the examining Inspector was demonstrably unrealistic.

5.29. Even without the newly arising evidence, the Inspector found in her post-hearings note that the trajectory for this site should be delayed by a year. The Inspector suggested this on the misunderstanding that the Start to Finish report (CDH.10) suggests an average lead-in time of 2.3 years from the grant of outline planning permission until the first completion. In fact, the Start to Finish report suggests in Figure 4 that on average sites of this size take an average of 2.3 years from the approval of reserved matters until the first completion is achieved²³. Therefore, if the Start to Finish report is correctly applied, even if there was clear evidence that a residential application for the approval of reserved matters will be submitted in late summer 2022 and even if such an application is determined by the end of the year, the first completions wouldn't be expected to be achieved until 2025/26.

5.30. Given the already apparent delays to the J10 improvement works, to the progression of a strategic design code, to the submission of applications for the approval of reserved matters for enabling infrastructure works and to the selection of housebuilders, it would be expected that this will have had consequential effects on the timescale for the preparation and submission of applications for the approval of reserved matters and there is no evidence, let

²³ Which the Start to Finish report refers to as the planning to delivery period following the planning period. As set out in Appendix 1 of the report, the planning period covers the period from the validation of the first application until the decision date of the first detailed application, with the delivery period representing the date from the approval of the first detailed application (i.e. reserved matters) until the first completion.

alone clear evidence, as to when such applications will now be forthcoming. These delays will almost inevitably delay delivery from 2025/26.

5.31. Indeed, at present on this site:

- i. Housebuilders remain to be secured;
- ii. A substantial number of conditions remain to be discharged²⁴ for which there is as yet no application and no evidence of the necessary work having been undertaken;
- iii. The applications for the approval of reserved matters for strategic enabling works remain open for consultation, following which any objections will need to be resolved prior to determination;
- iv. There is no residential application for the approval of reserved matters;
- v. There is a need for significant infrastructure to be provided prior to first occupation including the provision of the Dashwood SANG (condition 44), the provision of parking at Dashwood SANG (condition 45) and the implementation of the planting scheme between Dashwood and Blakes Copse (condition 49).

5.32. For all of these reasons, it would be expected that the lead-in time is likely to be longer than that which would be achieved on other sites, and as such the first completions would not be achieved until at least 2025/26 if not later.

5.33. However, rather surprisingly, the Inspector examining the LPR has indicated in the further post hearings letter that she considers that this site will deliver more rapidly than she identified in her post hearings letter, based on evidence provided by the site promoter to the focussed consultation (notwithstanding that every previous trajectory of the site promoter has been demonstrated to be wholly unrealistic). In the post hearings letter, the Inspector suggests that 150 completions will be achieved in 2024/25, which would require the first completion in c.20 months' time. This is simply unrealistic for a site of this size based on my experience. However, given the clear recent findings of the examining Inspector

²⁴ Including pre-commencement conditions 5, 6, 17, 18, 19, 22, 23, 27, 28, 29, 32, 34, 37, 38 and 66; pre-reserved matters approval conditions 9, 10, 11, 12 and 39; pre-occupation conditions 44, 45 and 49; as well as numerous other such conditions which relate to sub-areas of the site.

notwithstanding that I do not consider this to be realistic, I accept this position. This increases the supply of the LPA by 120 homes.

5.34. The respective positions on the supply from large sites with outline planning permission is set out in Table 5.5 below.

Table 5.5 – the respective positions on the supply from large sites with outline planning permission for major development

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
Land to the East of Brook Lane	The 5YHLSPS	-	-	20	22	22	-	64
	The LPA updated	-	-	20	22	0	-	42
	The Appellant	-	-	20	22	0	-	42
Land adjacent to 125 Greenaway Lane	The 5YHLSPS	-	50	50	-	-	-	100
	The LPA updated	-	40	40	-	-	-	80
	The Appellant	-	40	40	-	-	-	80
East & West of 79 Greenaway Lane	The 5YHLSPS	-	-	24	-	-	-	24
	The LPA updated	-	-	6	-	-	-	6
	The Appellant	-	-	6	-	-	-	6
3-33 West Street	The 5YHLSPS	-	-	-	26	-	-	26
	The LPA updated	-	-	-	26	-	-	26
	The Appellant	-	-	-	0	-	-	0
Land East of Newgate Lane East	The 5YHLSPS	-	-	45	54	-	-	99
	The LPA updated	-	-	45	51	-	-	96
	The Appellant	-	-	45	51	-	-	96
Land at 18 Titchfield Park Road	The 5YHLSPS	-	-	6	-	-	-	6
	The LPA updated	-	-	5	-	-	-	5
	The Appellant	-	-	0	-	-	-	0
Welborne	The 5YHLSPS	-	-	30	180	240	60	510
	The LPA updated	-	-	30	180	240	60	510
	The Appellant	-	-	150	180	240	60	630
Land between and to the rear of 56-66 Greenaway Lane	The 5YHLSPS	-	-	14	14	-	-	28
	The LPA updated	-	-	14	14	-	-	28
	The Appellant	-	-	0	0	-	-	0
Land East of Posbrook Lane	The 5YHLSPS	-	-	-	57	-	-	57
	The LPA updated	-	-	-	57	-	-	57
	The Appellant	-	-	-	0	-	-	0
Eyersdown Farm	The 5YHLSPS	-	-	-	-	38	-	38
	The LPA updated	-	-	-	-	38	-	38
	The Appellant	-	-	-	-	0	-	0
Uncontested sites	The 5YHLSPS	-	30	90	140	145	18	423
	The LPA updated	-	30	90	140	145	18	423

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
	<i>The Appellant</i>	-	30	90	140	145	18	423
Total	The 5YHLSPS	0	80	279	493	445	78	1,375
	The LPA updated	0	70	250	490	423	78	1,311
	The Appellant	0	70	351	393	385	78	1,277

Local Plan Adopted Housing Allocations

5.35. The LPA include four existing allocations without planning permission in the deliverable supply and identify a contribution of 111 homes from these sites. The deliverability of each of these are considered below:

- i. Heath Road, Locks Heath (P/17/1366/OA) – this site was allocated in the DSP in June 2015. An outline planning application was submitted in November 2017 and the LPA resolved to grant planning permission in February 2018 subject to the agreement of a s106. However, as with many other sites across Fareham the grant of planning permission has been delayed owing to nitrate neutrality issues for which solutions have been identified but remain to be committed to in a s106 agreement. Whilst this does represent progress towards the grant of outline planning permission, I have been unable to identify any evidence, let alone clear evidence akin to the examples in the PPG, that development will be forthcoming within five years²⁵. On the basis of the available evidence, this site should not therefore be considered deliverable, and the supply of the LPA should be **reduced by 70 homes**.
- ii. Wynton Way, Fareham – this site was allocated in the DSP in June 2015. In the subsequent 7 years there have been no planning applications submitted and I have been unable to identify any evidence to suggest that this site will be delivered within five years. Accordingly, on the basis of the available evidence, this site should not be considered deliverable and the supply of the LPA should be **reduced by 13 homes**.

²⁵ Additionally, the LPA’s trajectory unrealistically assumes that completions will be achieved from April 2023 on a site which does not even benefit from outline planning permission.

- iii. 335-357 Gosport Road, Fareham – as with the preceding site, no planning applications have been submitted in the 7 years since this site was allocated for development and there is no evidence that completions will be forthcoming, such that the supply of the LPA should be **reduced by 8 homes**.
- iv. Land East of Church Road, Warsash – this site was allocated in the DSP in June 2015 with an indicative capacity for 20 homes. A full planning application was submitted in March 2022 for the erection of 14 homes (6 fewer than assumed by the LPA). This application remains subject to objections including from the local highway authority. I have been unable to identify any evidence that these objections will be resolved or that completions will be delivered within five years. Even if such evidence was available the supply of the LPA would need to be reduced by 6 homes, but without this the supply of the LPA should be **reduced by 20 homes**, which I understand has been accepted by the LPA.

5.36. The respective positions on the supply from allocated sites without planning permission is set out in Table 5.6 below.

Table 5.6 – the respective positions on the supply from allocated sites

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
Heath Road, Locks Heath	The 5YHLSPS	-	35	35	-	-	-	70
	The LPA updated	-	35	35	-	-	-	70
	The Appellant	-	0	0	-	-	-	0
Wynton Way	The 5YHLSPS	-	-	13	-	-	-	13
	The LPA updated	-	-	13	-	-	-	13
	The Appellant	-	-	0	-	-	-	0
335-357 Gosport Road	The 5YHLSPS	-	8	-	-	-	-	8
	The LPA updated	-	8	-	-	-	-	8
	The Appellant	-	0	-	-	-	-	0
Land East of Church Road	The 5YHLSPS	-	5	15	-	-	-	20
	The LPA updated	-	5	9	-	-	-	14
	The Appellant	-	0	0	-	-	-	0
Total	The 5YHLSPS	-	48	63	-	-	-	111
	The LPA updated	-	48	57	-	-	-	105
	The Appellant	-	0	0	-	-	-	0

Sites on the Brownfield Land Register

5.37. The LPA include 4 sites comprising 192 homes which are identified on Part 1 of their Brownfield Land Register (BLR). None of these sites are on Part 2 of the BLR as according to the LPA's website:

"Part 2 comprises only those sites contained in part 1 that Fareham Borough Council has decided would be suitable for granting a permission in principle (PiP) for residential development."

5.38. The LPA has not undertaken any consultation with statutory consultees on the suitability of these sites and does not consider the BLR sites in question to be suitable for PiP. As such in order for a decision-taker to conclude that these sites offer a suitable location for development now, there would need to be sufficient evidence²⁶ to satisfy themselves that these sites could be delivered without any unacceptable highways, drainage, ecological, landscape, heritage, amenity or other effects.

5.39. As with the preceding sites, the LPA has provided no evidence, let alone clear evidence, that completions will be achieved on these sites, such that they should not be considered deliverable even if there was sufficient evidence to conclude that they offered suitable locations for development now.

5.40. I nevertheless proceed to consider each of the sites in turn below:

- i. Warsash Maritime Academy – this site was first added to the BLR in December 2017. A full planning application was submitted in December 2021 for the demolition of 284 student bedspaces and the development of 125 homes. The loss of 284 student bedspaces equates to a loss of the equivalent of 126 homes. In totality, this development provides for a net loss of 1 home. However, the LPA assume that the delivery of this site will increase the dwelling stock by 125 homes rather than reducing it by 1, contrary to the PPG (68-029). Furthermore, this planning application remains subject to numerous objections and concerns including (but not limited to) from a Conservation Planner of the LPA²⁷, a Strategic Transport Manager of the local highway

²⁶ Akin to that which would be considered at a Local Plan examination or when determining a planning application.

²⁷ Who identifies that (amongst other things) aspects of the proposals will "significantly harm the special architectural and historic interest of the building [Moyana Block] and could not be supported in Historic Environment policy terms."

authority, and an Urban Designer of the LPA. As with other sites, I have been unable to identify any evidence that any objections will be resolved. Additionally, there remains a requirement for the LPA to complete an HRA on this site to demonstrate that there will not be adverse impacts on an SSSI, an SAC, an SPA and a Ramsar Site. Until this HRA has been completed the precautionary principle applies such that this site cannot be concluded to offer a suitable location for development now such that they cannot be concluded to be deliverable in accordance with paragraph 89 of the appeal decisions at Land at Newgate Lane (North) and (South) (CDJ.7). I have also been unable to identify any evidence, let alone clear evidence, that completions will be delivered within five years. For each of the preceding reasons, the supply of the LPA should be **reduced by 100 homes** but if there was clear evidence that this site will deliver within five years it would be necessary to reduce the supply of the LPA by 126 homes to account for the loss of the equivalent of 126 homes from the demolition of 284 student bedspaces.

- ii. Locks Heath District Centre – this site first appeared on the BLR in October 2020. No planning application has been submitted on this site and I have been unable to identify any evidence whatsoever to demonstrate that completions will be achieved within five years. Accordingly, the supply of the LPA should be **reduced by 35 homes**.
- iii. Former Filling Station, Locks Heath Centre – the circumstances for this site are identical to those for the preceding site and as such the supply of the LPA should be **reduced by 30 homes**.
- iv. Assheton Court, Portchester – this site was identified on the BLR in October 2020. A full planning application for the conversion of the existing residential flats to provide a net increase of 27 homes was submitted in July 2022. This application is subject to numerous objections including a holding objection from the local highway authority, an objection from the Environment Agency, a request for additional information from a Senior Ecologist of the County Council, and a request for an AA/HRA from Natural England given that the proposed development could have a likely significant effect on the Solent and Dorset Coast SPA, the Portsmouth Harbour SPA and Ramsar Site, the Chichester and Langstone Harbours SPA, the Solent Maritime SPA, the Solent and Southampton Water SPA and the Solent and Isle of Wight Lagoons SAC. I have been unable to identify any evidence that any objections will be resolved, and the

precautionary principle applies such that this site cannot be concluded to offer a suitable location for development now such that it cannot be concluded to be deliverable in accordance with paragraph 89 of the appeal decisions at Land at Newgate Lane (North) and (South) (CDJ.7). Additionally, even if the objections and the precautionary principle were disregarded, I have once again been unable to identify any evidence, let alone clear evidence, that completions will be delivered within five years. As such the supply of the LPA should be **reduced by 27 homes** on the basis of the available information.

5.41. The respective positions on the supply from BLR sites is set out in Table 5.7 below.

Table 5.7 – the respective positions on the supply from BLR sites

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
Warsash Maritime Academy	The 5YHLSPS	-	50	50	-	-	-	100
	The LPA updated	-	50	50	-	-	-	100
	The Appellant	-	0	0	-	-	-	0
Locks Heath District Centre	The 5YHLSPS	-	-	35	-	-	-	35
	The LPA updated	-	-	35	-	-	-	35
	The Appellant	-	-	0	-	-	-	0
Former Filling Station	The 5YHLSPS	-	-	30	-	-	-	30
	The LPA updated	-	-	30	-	-	-	30
	The Appellant	-	-	0	-	-	-	0
Assheton Court	The 5YHLSPS	-	-	-	27	-	-	27
	The LPA updated	-	-	-	27	-	-	27
	The Appellant	-	-	-	0	-	-	0
Total	The 5YHLSPS	-	50	115	27	-	-	192
	The LPA updated	-	50	115	27	-	-	192
	The Appellant	-	0	0	0	-	-	0

Sites outside of Category A and Category B

5.42. The LPA include three unallocated sites which were the subject of undetermined planning applications in the deliverable supply providing a total of 208 homes. Two of these sites benefited from a resolution to grant planning permission at the base-date. Even assuming that planning permission is granted on these two sites and planning permission is granted on the third, the point at which these sites become eligible for inclusion will post-date the base-date. The inclusion of such sites in the deliverable supply would therefore be contrary to:

- i. The PPG (68-007) which identifies that the sources of supply which can be included where there is clear evidence are “namely” those specified in the definition of a deliverable site which does not include unallocated sites without planning permission such as these;
- ii. The findings of every Inspector nationally of which I am aware that sites which post-date the base-date such as these should not be included in the deliverable supply;
- iii. The explicit findings of numerous Inspectors and the Secretary of State including for example in paragraph 18 of the Winsford recovered appeal decision (CDJ.11) who have identified that unallocated sites subject to a resolution to grant planning permission at the base-date should not be included in the deliverable supply;
- iv. The consistent findings of Inspectors in Fareham Borough including for example in paragraph 89 of the appeal decisions at Land at Newgate Lane (North) and (South) (CDJ.7) and paragraph 90 of the appeal decision at Land to the East of Downend Road (CDJ.3); and
- v. The position of Mr Roberts to previous appeals.

5.43. Therefore, in principle none of these sites can be included in the deliverable supply. I nevertheless proceed to consider these sites below:

- i. Land at Brook Lane, Warsash (P/17/0845/OA) – the LPA resolved to grant outline planning permission on this site subject to entering into a s106 in October 2018. However, in the subsequent almost four years no such agreement has been reached and an appropriate assessment has yet to be completed. I have been unable to identify any evidence, let alone clear evidence, as to progress towards a s106 agreement, or

how the remaining issues will be resolved, or that completions will be forthcoming within five years. Accordingly, not only should this site not been included in the deliverable supply as a matter of principle, even if a contrary view to every Inspector and the Secretary of State was adopted, the precautionary principle applies such that this site cannot be concluded to offer a suitable location for development now and there is no evidence to justify the inclusion of this site. As a result, the supply of the LPA should be **reduced by 137 homes**.

- ii. Robann Park, Southampton Road (P/19/1322/OA) – the LPA resolved to grant outline planning permission on this site in July 2021, subject to agreeing a s106. No such agreement has been reached to date. As with the preceding site, there is no evidence that planning permission will be granted or that completions will be achieved within five years, such that even if this site was considered capable of being included in the deliverable supply in principle notwithstanding the consistent findings of Inspectors and the Secretary of State, there is no evidence to justify the inclusion of this site. Accordingly, the supply of the LPA should be **reduced by 39 homes**.
- iii. Rookery Avenue, Sarisbury (P/19/0870/FP) – the LPA resolved to grant full planning permission for the development of 32 homes and the demolition of 2 homes (providing for a net gain 2 less than assumed by the LPA) in March 2022. As with the preceding sites, if this site gains planning permission this will post-date the base-date and so should not be included in the supply. However, even if a different approach was adopted, I have been unable to identify any evidence that completions will be achieved and so the supply of the LPA should be **reduced by 32 homes**.

5.44. The respective positions on the supply from sites outside of Category A and Category B is set out in Table 5.8 below.

Table 5.8 – the respective positions on the supply from sites outside of Category A and B

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr. 2027/June 2027	Total
Land at Brook Lane	The 5YHLSPS	-	-	24	50	50	13	137
	The LPA updated	-	-	24	50	50	13	137
	The Appellant	-	-	0	0	0	0	0
Robann Park	The 5YHLSPS	-	19	20	-	-	-	39
	The LPA updated	-	19	20	-	-	-	39
	The Appellant	-	0	0	-	-	-	0
Rookery Avenue	The 5YHLSPS	19	13	-	-	-	-	32
	The LPA updated	19	13	-	-	-	-	32
	The Appellant	0	0	-	-	-	-	0
Total	The 5YHLSPS	19	32	44	50	50	13	208
	The LPA updated	19	32	44	50	50	13	208
	The Appellant	0	0	0	0	0	0	0



Windfall

5.45. The LPA include a windfall allowance of 100 homes which is uncontested. The respective positions of both parties are set out in Table 5.9 below.

Table 5.9– the respective positions on windfall

Site	Position of:	July 2022/June 2023	2023/24	2024/25	2025/26	2026/27	Apr 2027/June 2027	Total
<i>Windfall</i>	<i>The LPA</i>	-	-	-	50	50	-	100
	<i>The Appellant</i>	-	-	-	50	50	-	100

6. The resultant 5YLS positions

6.1. The respective positions on the total deliverable supply are set out in Table 6.1 below, and then the respective positions on the 5YLS that arise are set out in Table 6.2.

Table 6.1 – the respective positions on the deliverable supply

Site	Position of:			Summary notes
	The LPA (published)	The LPA (updated)	The Appellant	
Category A sites				
Small permitted sites	70	70	60	Optimistic 22% non-implementation rate applied
Sites with outline planning permission for non-major development	12	12	12	
Sites with detailed planning permission	1,184	1,169	1,169	
68 Titchfield Park Road	9	6	6	Loss of equivalent of 3 homes omitted from LPA assessment
Phase 1, 69 Botley Road	12	11	11	Loss of 1 home omitted from LPA assessment
195-205 Segensworth Road	8	7	7	Loss of 1 home omitted from LPA assessment
Hammond Industrial Estate	36	33	33	Loss of 3 homes omitted from LPA assessment
24 West Street	7	0	0	Planning permission has expired
Uncontested sites	1,112	1,112	1,112	-
Category B sites				
Sites with outline planning permission	1,375	1,311	1,277	
Land to the East of Brook Lane	64	42	42	Reserved matters approval for 42 rather than 64
Land adjacent to 125 Greenaway Lane	100	80	80	Reserved matters application for 80 rather than 100
East and West of 79 Greenaway Lane	24	6	6	Full application for 6 rather than 24.
3-33 West Street	26	26	0	No clear evidence
Land East of Newgate Lane East	99	96	96	Reserved matters application for 96 rather than 99
Land at 18 Titchfield Park Road	6	6	0	No clear evidence
Welborne	510	510	630	Taken from Inspectors further post hearings letter
Land between and to the rear of 56-66 Greenaway Lane	28	28	0	No clear evidence



Site	Position of:			Summary notes
	The LPA (published)	The LPA (updated)	The Appellant	
Land East of Posbrook Lane	57	57	0	No clear evidence
Eyersdown Farm	38	38	0	No clear evidence
Uncontested sites	423	423	423	-
Allocated sites without planning permission	111	105	0	
Heath Road	70	70	0	No clear evidence
Wynton Way	13	13	0	No clear evidence
335-357 Gosport Road	8	8	0	No clear evidence
Land East of Church Road	20	14	0	No clear evidence
Sites identified on the BLR	192	192	0	
Warsash Maritime Academy	100	100	0	No clear evidence and even if there were this provides for a net loss of 1 home
Locks Heath District Centre	35	35	0	No clear evidence
Former Filling Station	30	30	0	No clear evidence
Assheton Court	27	27	0	No clear evidence
Sites outside of Category A and B				
Sites which post-date the base-date²⁸	208	206	0	
Land at Brook Lane	137	137	0	Post-dates the base date and no clear evidence
Robann Park	39	39	0	Post-dates the base date and no clear evidence
Rookery Avenue	32	30	0	Post-dates the base date and no clear evidence
Windfall				
Windfall	100	100	100	
TOTAL	3,252	3,165	2,618	

²⁸ Even assuming these sites gain planning permission.

Table 6.2 – the respective 5YLS positions

	The LPA's published position	The LPA's updated position	The Appellant's position
Minimum annualised local housing need from 1st April 2022	541	541	541
Minimum local housing need 1st April to 30th June 2022	135	135	135
Housing completions 1st April to 30th June 2022	18	18	18
Shortfall 1st April to 30th June 2022	117	117	117
Minimum local housing need 1st July 2022 to 30th June 2027 (inc/exc shortfall)	2,705	2,705	2,823
Five year requirement including 20% buffer	3,246	3,246	3,387
Deliverable supply	3,252	3,165	2,618
5YLS	5.01	4.88	3.86
Surplus/shortfall	+6	-81	-769

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