



Yvonne Wright  
c/o Tony Blackburn  
Programme Officer  
15 Ottawa Close  
Blackburn  
BB2 7EB

Our Ref: Inspector 1

Your Ref:

Please Ask For: Julie Glaister

Telephone: 01253 658687

Email: [julieg@fylde.gov.uk](mailto:julieg@fylde.gov.uk)

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Dear Mrs Wright

### **Inspector's Initial Questions to the Council**

I write in response to your letter of the 12<sup>th</sup> January in which you raised 11 separate questions under nine separate headings. The Council has set out its responses to your queries below.

#### **Clarity of Policies**

- 1. Paragraph 154 of the National Planning Policy Framework (the framework) states that *'Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan'*.**

**In this regard I note that a number of the policies in the plan appear mainly or partly to set out general Council aspirations or objectives rather than to provide a clear indication of how a decision maker should react to a development proposal. Examples include: HW1, EC2, EC3, EC4, EC6, T4 and CL1. Can the Council explain what these policies are trying to achieve and comment on whether they consider they accord with Paragraph 154 of the Framework?**

The policies in the plan are positively-framed where possible, stating what is required of developers, but also stating where beneficial aspects of development proposals will be welcomed, and hence given weight in the planning balance towards approval. Where policies set out Council aspirations or objectives, this is done in such a way as to give clear support to development proposals which fulfil them, at least in respect of that particular policy, or to give wider context to specific criteria. This represents a clear indication as to how the decision maker should react to a proposal. It is important to recognise that policies are not debarred from seeking to achieve positive outcomes, rather than merely exercising control on negative outcomes: the opening section of paragraph 154 states that *"Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development..."*

The policies generally include a range of actions, some of which may be more specific than others; however, it is important to consider the objectives of the policies in the round, in the interests of sound spatial planning rather than being restricted solely to land use matters. It is important for the decision maker to understand the purpose of the policy, what it is trying to achieve on a broader level, as well as any specific restrictive criteria, in determining whether harm or benefit arises from the proposal.

In some cases, the text of the policies partly reflects the requests of statutory consultees, who require particular forms of wording; generally the Council has followed their advice, where the spatial priorities of consultees coincide with those of the Council. The form of wording is taken to be necessary in support of the position taken in individual consultations to development proposals, so that the decision maker has policy support for the refusal of an unacceptable proposal on the advice of the consultee.

The approach taken and style of policies included is a common style found in many adopted Local Plans that have been found sound following the introduction of the Framework, including the local example of West Lancashire. Where greater detail is required it is the intention of the Local Planning Authority to develop an appropriate Supplementary Planning Document.

With regard to the specific examples of policies you raise in your letter a more detailed analysis is provided below.

#### Policy HW1 Health and Wellbeing

The Council considers that Policy HW1 provides a clear indication of how the Local Plan Strategic Objective 5: To develop socially cohesive, safe diverse and healthy communities can be implemented by development proposals. Policy HW1 integrates public health principles and the planning system to help reduce health inequalities through collaboration with other Duty to Co-Operate partners. The policy positively promotes healthy lifestyles, through improvements to existing facilities and developing new facilities such as cycle and pedestrian routes, as well as seeking land or financial contributions for new or improvements to existing healthcare facilities; whilst safeguarding and encouraging the provision of allotments and other similar land uses.

The policy also requires the developer to provide a Health Impact screening (for major developments on strategic sites) this may then demonstrate a need for a Health Impact Assessment, which in turn should evidence choices about alternatives and improvements to developments which actively promote health.

The policy also supports the Whyndyke Farm strategic site which is one of the Government's Healthy New Town Pilot schemes which seeks to promote healthy lifestyles through the design of the site.

#### Policy EC2 Employment Opportunities

The Council considers that Policy EC2 provides a clear indication of how Local Plan Strategic Objective 4: To diversify and grow the local economy can be implemented by development proposals, in particular how a decision maker should react to development proposals concerning

employment opportunities. It provides a clear indication of the Council's objective of seeking to retain employment opportunities through the retention of employment on existing employment sites and gives a clear indication of the factors the Council will seek to take account of when making such decisions.

It further provides a clear indication of support from the Council for development opportunities that allow for the sustainable growth and expansion of all types of businesses and also the continued provision of high speed broadband in order to support economic growth and expansion.

#### Policy EC3 Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems, Warton

The Council considers that Policy EC3 provides a clear indication of how Local Plan Strategic Objective 4: To diversify and grow the local economy can be implemented by development proposals, in particular how decision maker should react to development proposals concerning employment opportunities at both BAE Systems and their site at Warton and also the delivery of the Lancashire Enterprise Zone. It provides a clear indication of the Council's objective of seeking to support the specialised activity at BAE Systems site in Warton as well as the delivery of the Lancashire Enterprise Zone and gives a clear indication of the desire to permit activity which helps create more businesses, jobs and attracts international investment and the resulting positive benefits across the wider economic area.

#### Policy EC4 Blackpool Airport Enterprise Zone

The Council considers that Policy EC4 provides a clear indication of how Local Plan Strategic Objective 4: To diversify and grow the local economy can be implemented by development proposals at both Blackpool Airport and the Blackpool Airport Enterprise Zone. EC4 sets out clearly that the Council supports the sustainable development of Blackpool Airport and also enabling development associated with the delivery of the Blackpool Airport Enterprise Zone. It gives clarity as to what will and will not be permitted and where, particularly given that the site is partly within the designated Green Belt.

EC4 is seeking to support the creation of more businesses, jobs and attract international investment and the resulting positive benefits across the wider economic area.

#### Policy EC6 Leisure, Culture and Tourism Development

The Council considers that Policy EC6 provides a clear indication of how Local Plan Strategic Objective 4: To diversify and grow the local economy can be implemented by development proposals which improve the leisure, culture and tourism offer, all of which form an important component of the local economy. In particular EC6 gives clarity as to what will and will not be permitted and where, in relation to key areas such as The Island Sea Front Area, Ribby Hall Holiday Village and in rural areas. With particular reference to Ribby Hall Holiday Village EC6 provides a clear indication of how a decision maker should react to development proposals given the sites location and the provisions of Policy GD2 and GD3.

## Policy T4 Enhancing Sustainable Transport Choice

The Council considers that Policy T4 Enhancing Sustainable Transport Choice provides a clear indication of how Local Plan Strategic Objective 1: To create sustainable communities can be implemented by development proposals.

Policy T4 provides a clear indication of how the Council intends to work with others and what its expectations are with respect to increasing sustainable transport choice. It does this by setting out how (criterion a to m) the Council will work with the Highway Authority, Highways England, Network Rail and transport providers to consider development proposals in order to secure the long term viability of the Borough and to allow for the increased movement of people and goods. In addition Policy T4 also makes clear the requirement for all development proposals that generate significant amounts of movement to be supported by a Transport Statement or Transport Assessment in line with the PPG.

## Policy CL1 Flood Alleviation, Water Quality and Water Efficiency

The Council considers that Policy CL1 provides a clear indication of how Local Plan Strategic Objective 1: To Create Sustainable Communities and Strategic Objective 2: To maintain, improve and enhance the environment can be implemented by development proposals.

Fylde is a low lying, relatively flat area with an extensive coastline, coastal resorts and bathing waters and protected European Ecological Designations which need to be protected from pollution. Fylde's unique geography creates a number of flooding and water quality issues, so this policy is of particular importance to the borough, hence its detail.

The Council consider that this policy is positively prepared and framed, complimenting both paragraphs 100 and 154 of the Framework, in that it clearly sets out how the decision maker should assess a planning application in terms of flood alleviation, water quality and water efficiency, by ensuring that schemes do not cause flooding or pollution and that all alternative and sustainable water management initiatives are adhered to. It establishes what is expected from a development within a set of criteria, with additional policy objectives covering SuDS being addressed in Policy CL2.

## Summary of main issues

**2. The document SD011 'The Statement of Regulation 20 Consultation' appears to summarise all of the issues raised in representations in Plan policy order. Whilst the Council has also provided a summary statement of what it considers to be the main issues on page 197 of the document, it would be most helpful if a short and focussed response could be provided to each of these.**

**Brief responses to the questions suggested within the Summary Statement of Main Issues:**

**1. Whether the Duty to Co-Operate is fulfilled, given the inclusion of 14 ha of employment land to assist Blackpool in meeting its requirement, and the late request from Wyre Council to provide an unspecified quantum of land to assist in meeting its housing need.**

The Statement of Compliance – Duty to Co-Operate (Submission Document SD007) sets out the relationships that Fylde Council has with bodies with which co-operation is prescribed under the Duty to Co-Operate.

Under the Duty to Co-Operate, Fylde Council has provided 14 Ha of employment land within the Local Plan to meet unmet need in Blackpool. This is described in paragraph 9.11 on page 74 of the plan.

Wyre Council and others, in their representations, have suggested that the Duty has not been fulfilled owing to the absence in the plan of any provision of land to assist Wyre in meeting what is stated to be its need for housing. The extent of the unmet need is unclear and evidence has not yet been presented. It is possible that the amount requested could require a new or redrawn development strategy for Fylde, which would undermine the progress of the Fylde Local Plan. Should the request, when detailed and evidenced, be considered reasonable, Fylde Council would consider the request through a review of the plan, following adoption. In the meantime, Fylde Council has continued to work with Wyre, including agreement in principle with a potential road scheme through land in Fylde to support delivery of sites in Wyre. Fylde Council therefore considers that it has met, and continues to meet, the Duty to Co-Operate.

**2. Whether the development strategy will result in delivery of the required housing number over the plan period, notwithstanding that over 60% of the housing requirement is through existing commitments.**

The development strategy is set out in Chapter 6 of the plan, and development locations within each strategic location in Chapter 7. Development will be distributed over 4 strategic locations, as well as non strategic sites; within the strategic locations, development will be delivered over a number of strategic and non-strategic sites. The housing trajectory in Appendix 2 (pages 209 – 214) shows the anticipated delivery profile of each site over the course of the plan period. Rates of delivery are assessed on the basis of a standardised 30 homes per annum (15 in the first year); on larger sites (over 300 homes) it is assumed that there will be a second developer, providing for the rate to double. These delivery rates have been established through the Strategic Housing Land Availability Assessment Steering Group which includes representatives of the development industry who are active in the local area and so have experience of the local housing market.

The trajectory shows that the plan will deliver 7891 homes, as against the requirement of 7768. All strategic sites have owners or developers committed to bringing them forward, including the only strategic site for which the planning applications are still awaited. Any residual risk of non-delivery, despite the existing level of commitments, is balanced by the spread of development sites around a range of locations, and the number of different developers by whom the sites will be delivered.

**3. Whether the development strategy provides an appropriate balance of development between the various strategic and non-strategic locations, in view of the importance of directing development to sustainable locations.**

Table 2 on page 41 of the plan shows the amount and proportions of development in the plan that will occur in each of the strategic locations, and outside these. The strategic locations represent the most sustainable locations for development within the borough.

The plan has been challenged by a number of developers in representations, putting forward sites in non-strategic locations. Inclusion of more such sites would inevitably alter the balance of development as set out in Table 2, towards less sustainable locations and away from the strategic locations. The proportions in Table 2 reflect what is considered to be a balanced distribution of sustainable sites across the borough, that is deliverable with regard to infrastructure requirements and constraints such as flood zones, green belt and the coast with its associated European ecological designations.

**4. Whether the amount and location of employment land is appropriate to meet the needs of the borough, noting the inclusion of 14 ha for Blackpool's needs.**

Paragraphs 9.8 to 9.16 of the plan (pages 73 – 77) provides an explanation of the position taken. The requirement for the plan period is based on a rolling forward of the annual average take-up rate since 1989; this is supported by the Fylde Employment Land and Premises Study 2012, which has assessed this rate to be the long-term trend. Additionally 14ha of land is included under the Duty to Co-Operate to meet unmet need in Blackpool, in recognition of the tight borough boundary around the existing developed area of Blackpool, and the opportunity afforded by the Blackpool Airport Enterprise Zone, located within the Fylde-Blackpool Periphery. New employment land is provided at all strategic locations for development, in some instances within mixed-use sites, and this spread of sites is considered important in the overall sustainability of the plan. The Lancashire Advanced Engineering and Manufacturing Enterprise Zone at BAE Systems Warton is of national importance for the advanced engineering and manufacturing sector, providing authorisation through a Local Development Order (LDO) for development falling within certain Standard Industrial Classification (SIC) codes, but was excluded from the Fylde Land and Premises Study as it provides for re-use of existing employment land for a specific sector with wider-than-local considerations. Taken together, it is considered that the portfolio of sites will make for effective delivery of the employment land required.

**5. Whether the housing requirement is too high, given the potential impact of development and the limits to deliverability, or too low, given the wide range of economic development forecasts.**

The overall housing requirement is noted in Policy DLF1 and set out fully in Policy H1 and its commentary on pages 96 and 97 of the plan. The Housing Requirement Paper 2016 (Evidence Document ED017) provides a fully detailed explanation of the derivation of the housing requirement figure, itself drawing on evidence from the Fylde Coast SHMA (Document ED021), Addendum 1 to the SHMA (ED022) and Addendum 2 to the SHMA (ED023). The Housing Requirement Paper

examines the projections and then considers the effect of a range of factors including the economic context for Fylde and the effect of market signals, resulting in a significant uplift in the delivery of housing over the population projections.

Addendum 2 to the SHMA provides a modelled need based on the 2012 SNHP of 237 dwellings per annum. The economic context for Fylde is that its functional economic area is regional, if not national; the employment trend identified in the SHMA showed a loss of 48 jobs per annum over a ten year period; the current commuting ratio is 50%, implying that, for every 10 new jobs created, only 5 employees will choose to live in Fylde. The market signals reviewed including land prices, house prices, rents and affordability provide no indication of undersupply relative to demand; overcrowding is insignificant in Fylde. The rate of development over the 4 years 2012-2016 has been consistently just 7% of commitments or below; Over a 13 year period the average delivered has been 210 dwellings per annum, with a wide variation due to an effective moratorium then the recession. However, the increase in commitments has not had an impact on completions.

The conclusion follows that any uplift associated with trends provided by market signals should be relatively modest. The housing requirement figure of 370 dwellings per annum provides an uplift of 50% above the 2012 SNHP projection, providing for growth identified as likely in the market signals analysis. This represents a high level of delivery in relation to previous years, but is considered, by the local planning authority, to be deliverable.

#### **6. Whether the policies on density, mix, affordable housing, design and masterplanning are appropriate and avoid impacts on the viability of the plan.**

The relevant policies of the plan are H2, H4, GD7 and M1. Policy H2 requires developments to contribute to the mix of homes required in the borough, according to the Fylde Coast SHMA (Document ED021), and to provide for the needs of the elderly, who represent all of the projected growth of the borough's population (see pages 103 to 104 of the plan and Document ED029 Specialised Housing Background Paper). Policy H4 requires 30% affordable housing to meet affordable housing need set out in the SHMA (ED021). Policy GD7 sets out a number of design principles which will be considered in assessing development proposals. Policy M1 requires a masterplanned approach in strategic locations to ensure the creation of coherent and legible new places, in particular to prevent juxtaposed developments that fail to integrate; the policy then lists considerations necessary in development of the masterplan.

The plan has been subject to a viability assessment. The submission document (SD006) is an Addendum Report to the earlier document (ED016): the two should be read in conjunction. They conclude that the overall scale of obligations, standards and policy burdens do not cumulatively threaten the ability of the sites to be developed viably.

#### **7. Whether adverse impacts on biodiversity are limited in accordance with the Framework, and particularly whether adverse effects on European sites are avoided or mitigated.**

The plan has been subject to a HRA (Submission Document SD005). This concludes that the plan would have no likely significant effects on the European-designated sites, either alone or in

combination with other plans or projects. One site in the plan is identified to require Appropriate Assessment at project level, and this is being undertaken, with the agreement of Natural England.

The plan has been written to be read as a whole, and therefore protection for biodiversity and requirements for mitigation measures are not written into every criteria-based policy. Instead, the approach has been to include the specific policy ENV2, which attaches borough-wide protection for biodiversity following the approach of the Framework, and the highest level of protection for the European sites. The HRA assesses the policy to be effective in this objective.

### **8. Whether the necessary infrastructure can be delivered along with the plan.**

The Infrastructure Delivery Schedule (page 82 of the Infrastructure Delivery Plan, in particular the table on pages 86 to 89), sets out the infrastructure considered to be required in order for the plan to be effective. This includes highways infrastructure, notably the M55 to Heyhouses (St. Annes) Link Road and improvements to Junctions 3 and 4 of the M55; flood risk management infrastructure, in particular the coastal defence replacements; education infrastructure, particularly new primary schools to serve development sites and a new secondary school in the borough; health infrastructure, in the form of a new health centre within site MUS2; and various other types of infrastructure.

No statutory infrastructure provider has raised an objection to the plan, or expressed concern as to its delivery due to infrastructure provision. There can therefore be a high degree of confidence in the delivery of necessary infrastructure.

### **Suggested modifications**

**3. Document SD014 suggests a number of additional (minor) modifications to the Plan, as well as other documents from the evidence base. Can the Council comment on whether any of these amendments are required for reasons of soundness and therefore constitute such a change to policy or the supporting text to warrant consideration as main modifications? If so have these suggested changes been through consultation?**

The minor amendments schedule is a list of factual corrections, updated information, and some improved wording to clarify the intentions of the plan as suggested by statutory bodies. None of the amendments are required for reasons of soundness, and consultation on these was not, therefore, considered necessary. They have been provided to ensure that up-to-date factual information is available to the inspector and others.

### **Objectively Assessed Housing Need (OAN)**

**4. The DCLG released its 2014 based sub-national household projections in July 2016. The OAN figure in the LP uses the 2012-based sub-national household projections. Reference has been made by the Council within Document SD011 to these being only a 1% difference in projected household numbers between the 2012 and 2014-based projections. Can the Council provide an assessment of this comparison in a table please? Does this have any significant implications for the OAN and the Housing Requirement in the Plan?**



<b>Household Projections for Fylde 2012-2037</b> (numbers of households 1000s)						
2012	2017	2022	2027	2032	2037	% change 2012 - 2037
35	36	37	39	40	41	15.6%
Source: DCLG 2012-based household projections to 2037 for England						
<b>Household Projections for Fylde 2014 – 2039</b>						
	2014	2019	2024	2029	2039	% change 2014- 2039
	36	37	39	40	42	16.6%
Source: DCLG 2014-based household projections to 2039 for England						

The analysis of this data was carried out by Lancashire County Council and the percentage figures are taken from Fylde's Area Profile [www.lancashire.gov.uk](http://www.lancashire.gov.uk)

The DCLG 2014-based household projections cover a slightly different time period as illustrated by the table. The time period extends to 2039, 7 years beyond the end of the plan period. Given that the increase of 1% occurs over a longer period than the plan it is reasonable to assume that the increase is actually less than 1%.

It is not considered that this has any significant implications for the OAN and the Housing Requirement in the Plan. From the SHMA, 'overall, there is an estimated need for 207 affordable homes per year in Fylde, with an objectively assessed need for between 300 and 420 dwellings per annum'. Addendum 2 which used the 2012 Household Projections altered the OAN range to 248-450. The housing requirement figure of 370 represents a substantial uplift, over 50%, from the 2012SNHP 'starting point' projection of housing growth and need.

It is also useful to consider the household projections year by year over the plan period they are included in the table below.

Sub National Household Projections for Fylde 2011 to 2032 – The Local Plan Period (Numbers of Households in Thousands)

	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
SNHP 2012	35	35	35	36	36	36	36	37	37	37	37
SHNP 2014	35	35	35	36	36	36	37	37	37	37	38

	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
SNHP 2012	37	38	38	38	38	39	39	39	39	39	40
SNHP 2014	38	38	39	39	39	39	39	40	40	40	40

Source: DCLG 2012 Household Projections by District, England 1991-2037 and DCLG 2014 Household Projections by District, England, 1991-2039.

At 2032, the end of the plan period, the projected number of households in thousands is the same for both the 2012 and 2014 projections, at 40,000.

In conclusion, a 1% increase in the percentage change in the Household Projections from the 2012 SNHP to the 2014 SNHP (which is less than a 1% increase over the plan period) does not have significant implications for the OAN and the Housing Requirement Figure.

**5. Why has the Council chosen to align the housing requirement with the Experian employment-led scenario rather than the Aecom or Oxford Economics scenarios? Can the Council point me to the independent evidence justifying this approach?**

The Council has not aligned the housing requirement with the Experian employment-led scenario rather than the Aecom or Oxford Economic scenarios.

It is coincidental that the Council's Housing Requirement Figure of 370 per annum is close to the figure of 366 ( the Experian Employment-led forecast) found in Figure 7.11 of the SHMA. The SHMA was followed by Addendum 1 and Addendum 2 and The Council's Housing Requirement Paper 2016.

The Housing Requirement Paper 2016 (Evidence Document ED017) provides a fully detailed explanation of the derivation of the housing requirement figure, itself drawing on evidence from the Fylde Coast SHMA (Document ED021), Addendum 1 to the SHMA (ED022) and Addendum 2 to the

SHMA (ED023). The Housing Requirement Paper examines the projections and then considers the effect of a range of factors including the economic context for Fylde and the effect of market signals, resulting in a significant uplift in the delivery of housing over the population projections.

### **Five year supply of housing land**

**6. I note the Council's housing trajectory set out in Table 2 of the Plan and site assessment evidence. It would be most helpful if the Council could provide me with a summary table bringing together the evidence to show the five year housing land supply (5YHLS) (including the required buffer) at the point of adoption? As well as providing the projected delivery by year and planning permission status for each site, the table should include a column which provides evidence and reasons as to why the Council considers the sites will be deliverable within the five year period (such as do the sites have developers on board and are there any constraints to delivery?).**

The table attached as the appendix to this responses document sets out the delivery over the first five years of the plan following adoption, providing a summarised extract of the trajectory in Appendix 2 of the plan. The delivery over the five years has been totalled to provide an overall figure. A total of 3471 homes are anticipated to be delivered over the five years following adoption. The annualised requirement of 420 for the remainder of the plan period, shown in the trajectory and the table provided, includes the shortfall from the beginning of the plan period. Five years of this annualised requirement totals to 2100. Addition of a 20% buffer would give a 5-year housing supply requirement of 2520. The supply will therefore be in surplus by 951 on adoption.

The Council has adopted a standardised build-out rate across all sites, which informs the projected delivery at each site shown in the plan trajectory. The standardised rate assumes that 15 homes will be built in the first year and 30 homes in subsequent years. If the site has a capacity of more than 300 homes then it assumes that there will be two developers and the output will be doubled. There is no phasing of development proposed within the plan. The date on which sites will commence delivery is based on the status of planning permissions and Section 106 agreements. The approach taken regarding build-out rates is consistent with the methodology the Council has used in its 5-year housing supply calculations.

The notes provided in the columns on the right in the table provide information on known developers, constraints and other relevant information.

### **Windfalls and Small Sites Allowance**

**7. Table 2 on page 41 of the LP states that 998 houses (12.6% of total supply) will come from allowances and unallocated sites. An allowance of 40dpa for windfalls has been included in the supply from Year 10. Can the Council point me to the evidence that justifies these figures?**

Appendix 2 of the LP, page 214, contains a spreadsheet that breaks the total of 998 down as follows:

<b>Allowances</b>	<b>Plan Period Total</b>
Small Site Completions	125
Small Site Commitment and Minded to Approve (unallocated sites)	383
Small Sites and Windfall Allowance (unallocated sites )	440
Long Term Empty Homes Re-entering the Market	50
Allowances Sub Total	998

#### Small Sites Completions

The small sites completions have already been completed in years 2011-2016. A small site is a site of 9 or less dwellings, small site completions includes non- allocated sites and factors in demolitions.

#### Small Sites Commitment and Minded to Approve (unallocated sites)

This comprises 326 commitments and 57 minded to approve. Giving a total of 383, as the Council cannot predict exactly when these will be completed they were spread over a five year period from 2016 -2021. This gave 77 completions per year for four consecutive years with 75 completions in 2020 – 2021.

Although these first two categories are listed as allowances they are in fact commitments, the completions from the commitments and minded to approve have been spread over five years.

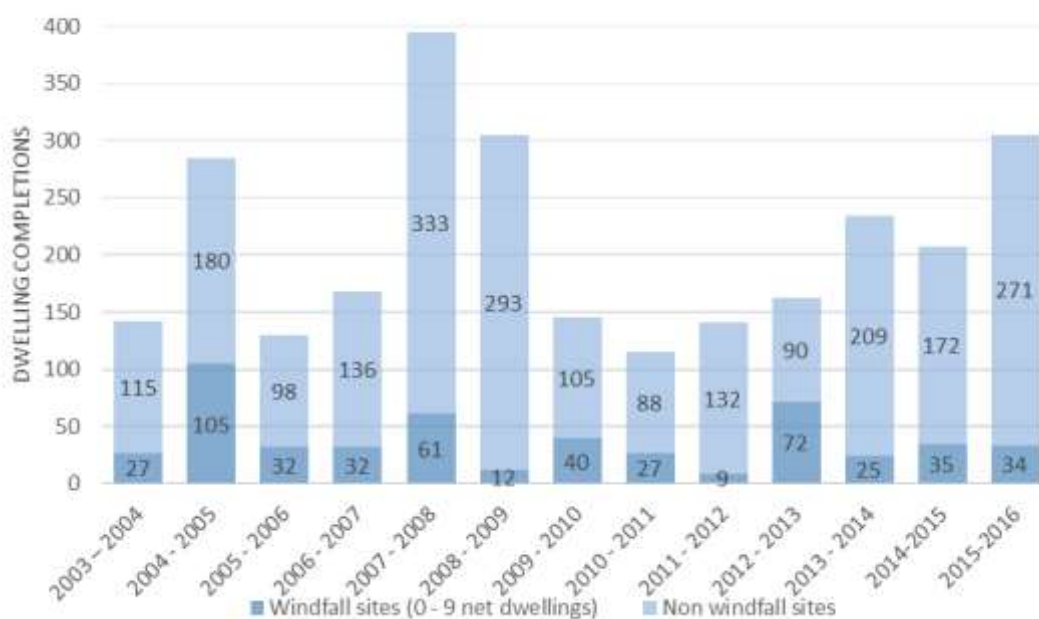
#### Small Sites and Windfall Allowance (unallocated sites)

Once the supply of small site commitments has been used up the Council makes an allowance for Small Sites and Windfalls of 40dpa from 2021- 2022 for eleven years giving a total of 440.

The evidence for this figure is taken from the Council's Housing Land Availability Schedule, it only includes sites for less than 9 dwellings and it excludes garden development. There are no site allocations in the Fylde Borough Local Plan ( As Altered ) October 2005 and so all housing sites are effectively windfall. As the emerging Local Plan has allocated sites of 10 units or more, it has presumed that sites of 9 units or less will come forward as windfall and this assumption has been applied to the previous plan period. The average number of windfall completions (using this

definition) is 39 per annum. However, it should be noted that this is a conservative estimate. There will continue to be windfall completions on much larger sites and if these were included the figure would be higher.

#### Windfalls and Total Completions 2003 -2016



#### Long Term Empty Homes re-entering the market

The final allowance is for long term homes re-entering the market. The Council has made an allowance for 50 dwellings in total (that is 10 dwellings per annum) from 2016-2021.

The Council publishes evidence on its strategies for bringing empty homes back into use via reports to the Environment, Health and Housing Committee. From April 2014 to July 2016 there has been a significant and continuing reduction of 122 (2 years plus empty). Therefore, it is considered reasonable to include an allowance for 10 dwellings per year. The Council includes an allowance for 50 long term empty homes re-entering the market in its five year housing land supply calculation.

#### Density and mix of new residential development

**8. Policy H2 requires the delivery of at least 20% of homes on sites of 20 or more dwellings to be designed to accommodate the elderly. Can the Council point me to the evidence that supports this provision?**

The supporting text on pages 103 to 105 of the plan provides a summary. The Specialised Housing Background Paper (Document ED029) provides an analysis of the issue of accommodation for the elderly, and further supporting evidence for the policy.

The evidence indicates that Fylde has an ageing population, and that it will have increasing needs for suitable accommodation. Fylde already has a much larger proportion (28%) of the population aged 65 and over than nationally (16%). The number of people aged 65 and over will increase by over 41% in the plan period. People of 65 and over will account for all of the overall increase in population in the borough during the plan period. Much larger numbers than at present will have specific care needs or mobility impairments. Against this, the existing supply of accommodation designed specifically for the elderly, including care homes, could accommodate at most 11% of the population of 65 and over at the end of the plan period. The policy therefore plans for a mix of housing based on current and future demographic trends, in line with paragraph 50 of the Framework.

### **Affordable housing**

**9. It is not clear from my reading of Policy H4 how, when 30% on-site affordable housing provision is sought, contributions for off-site provision will be required to the value of 43% of the number of market homes, as this is an equivalent value. Can the Council explain this please?**

Concerning the matter of affordable housing numbers, Policy H4 is seeking to achieve a composition of 70% market housing and 30% affordable housing by number of units on all sites to which it will be applied; this is on all market housing schemes of 10 or more homes.

Policy H4 prescribes a presumption in favour of on-site affordable housing, however in circumstances where the Council considers that affordable housing would be most appropriately provided off-site Policy H4 ensures that approximately 30% of the total number of houses by number (both affordable and market) are affordable houses. Accordingly a contribution of equivalent value is then sought.

The contribution to affordable housing must take account of both the units provided on the application site and those additional units that would be secured off site or by way of contribution. Therefore, multiplying the number of houses which are to be provided on the application site by 0.43 (43%) gives approximately (subject to rounding) the number of affordable houses to be provided off-site. Multiplying the number of market houses to be provided by 0.43 ensures that the number of affordable houses will always be approximately (subject to rounding) 30% of the total number of houses to be developed across the application site and off-site. Policy H4 then seeks a contribution equivalent in value to this given number of affordable houses.

The use of 43% is a simplification of a mathematical relationship when the desired amount of affordable housing is 30%. By way of an example were the desired affordable housing level to be 20% then the following would apply;

a = affordable housing %

m = market housing %

(a + m = 100, this must always be true as it is a percentage based calculation, similarly 100-m = a or 100-a = m)

x = multiplier

So  $(100/m)*a = x$

Looking at the 20% affordable example referred to above, the multiplier (x) would be;

$(100/80)*20 = 25\%$  or 0.25

### **Gypsies, travellers and travelling showpeople's sites**

**10. Can the Council explain why Policy H5 only proposes to deliver additional pitches for gypsies and travellers up to the year 2031 rather than 2032 (the Plan period)? What is the assessed need up to 2032?**

The original GTAA of 2014 (Document number ED020) provided an assessment of need for the period up to 2031. The GTAA was produced on behalf of the three Fylde Coast authorities working jointly under the Duty to Co-Operate and attempted to align with the likely plan periods of the three authorities as understood at the time. The approach is set out on page 11 of document ED020.

As explained further in response to question 11, the pitch requirement is now much reduced due to new evidence. Given the small numbers, the additional year is considered unlikely to result in additional pitch requirements. However, the plan includes a commitment in paragraph 10.80 on page 112 to review the requirements at least every 5 years or otherwise in accordance with national policy and guidance.

**11. Paragraph 10 of the National Planning Policy for Traveller Sites (2015), requires the identification of a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets and identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15. Paragraph 10.81 of the Plan states that Policy H5 sets out the location for the provision of pitches for gypsies and travellers up to 2031. However whilst a need for 26 extra pitches has been identified within the policy, only two committed sites are allocated delivering up to 5 pitches. Can the Council comment on their approach and the level of consistency with national policy?**

The plan was published for consultation with Policy H5 reflecting the evidence that was available at the time. However, the evidence (the GTAA 2014, Evidence Document ED020) was based on the definition of gypsies and travellers before the introduction of the revised Planning Policy for Travellers' Sites (2015) (PPTS) (Document ED019). Since PPTS requires identification of sites to provide for the needs of gypsies and travellers as defined by Annex 1 of the PPTS, it has been necessary to produce an updated study, the Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update. This is referred to in the plan on page 112, paragraph 10.78. The update has only very recently been completed and was approved by Council members on 18<sup>th</sup> January 2017. It forms an additional evidence document, no.EL1.002. The update concludes that Fylde Borough has a net surplus of 2 pitches, based on needs of gypsies and travellers known to meet the new definition, with a possible need arising for 2 pitches for those whose status could not be established.

Early drafts of the study indicated that the number of pitches required was likely to be significantly reduced. On this basis it was considered unwise to allocate pitches on the basis of the earlier evidence, as the update would have rendered the allocations unnecessary, possibly undeliverable and with the potential for blighting the land in question. The policy was therefore based on criteria which allow for development to occur in appropriate locations where a need is demonstrated. With the level of need in accordance with PPTS now reduced, the criteria-based policy remains the most appropriate, although the numbers in the first paragraph could be removed as superfluous.

I hope the Council's response to these preliminary questions resolves your queries. If you have any further queries please do not hesitate to contact us.

Yours faithfully



Julie Glaister Planning Policy Manager



## Appendix to responses to Inspector's Preliminary Questions: Five Year Trajectory

Site	Site Reference	Planning Application number	Allocations	Minded to approve (net)	Planning application commitment (net)	Completion (net)	UC / NS (net)	Five years from adoption					5-year Total	Developer?	Constraints	Notes	
								2016-2017 Current year projected	2017-2018	2018-2019	2019-2020	2020-2021					2021-2022
<b>SL1 - Lytham and St Annes Strategic Location for Development</b>																	
Queensway, St Annes	HSS1	08/0058 OL 13/0257 RM 15/400 FULL			1150		1150	30	60	60	60	60	60	300	Kensington Developments Ltd	Construction of link road required at stage of development	Additional funding identified in IDP
Lytham Quays, Lytham	HSS3	02/0641 OL 06/0074 RM 09/0659 OL 11/0374 RM			120	119	1	1						0			
Heyhouses Lane, St Annes	MUS4	12/0465 OL 13/0448 RM 15/787 OL		160		43	119	45	45	29				74	Morris Homes	None: developer on-site	
										15	30	30	30	105			
Queen Mary School, Clifton Drive South, St Annes	HS1	03/0157 COU			41	35	6	6						0	Barratt	Complete	
Jubilee House, East Beach, Lytham	HS2	13/0001 FULL			20		20	15	5					5	Not identified		
Ashton Nurseries, Mythop Road, Lytham	HS3	07/1264 OL			10		10		10					10	Not identified		
The Gables, 35-39 Orchard Road, St Annes	HS4	05/0648 FULL			19		19	15	4					4	R.P. Tyson Construction		New application pending 16/0639
7-8 St Georges Square, St Annes	HS5	10/0891 COU			11		11	11						0	Peter Donnelly	Complete	
68 North Promenade & 1 Sandgate, St Annes	HS6	08/0853 FULL			12		12	12						0			Also permission 13/0744
Petros House, St Andrews Road North, St Annes	HS7	14/0418 COU			35		35	15	20					20	Tustin Developments	None: developer on-site	
35-37 South Promenade, St Annes	HS8	14/0327 OL			36		36		15	21				36	McCarthy & Stone	Complete	
23 - 33 Fairhaven Road, St Annes	HS9	14/0320 FULL			32		32	15	17					17	Westby Homes	None: developer on-site	
34-36 Orchard Road, Lytham St Annes	HS10	15/0176 FULL			14		14	14						0	Clifford House 2002 Ltd	None	
The Galleries, 2-4 Kingsway, Lytham	HS11	15/0486 FULL			10		10	10						0			
Fairways, Heeley Road, St Annes	HS12	08/0092 OL		20						15	5			20	Not identified		
Kingsway Garage, St Annes	HS13	11/0667 OL		30						15	15			30	Not identified		
Axa, Lytham	HS14	13/0152 OL		45						15	30			45	Not identified		Currently being actively marketed
Land to the West, Ballam Road, Lytham	HS15	14/0161 FULL		12					12					12	Windmill Oaks Ltd	None: developer on-site	
353 Clifton Drive North, St Annes	HS16	11/0312 FULL			34	34	C							0			
Hastings Point, Ballam Road, Lytham	HS17	03/0157 FULL			25	25	C							0		Complete	
Former FBC Depot, St Davids Road North, St Annes	HS18	12/0537 FULL			32	32	C							0		Complete	
1 Lord Street, St Annes	HS19	14/0178 FULL			14	14	C							0		Complete	
Former Kwik Save, St Annes	HS20	14/0790 FULL			15	15	C							0		Complete	
<b>Lytham and St Annes Sub Total</b>			<b>0</b>	<b>267</b>	<b>1792</b>	<b>317</b>	<b>1475</b>	<b>189</b>						<b>678</b>			

Site	Site Reference	Planning Application number	Allocations	Minded to approve (net)	Planning application commitment (net)	Completion (net)	UC / NS (net)	Five years from adoption					5-year Total	Developer?	Constraints	Notes	
								2016-2017 Current year projected	2017-2018	2018-2019	2019-2020	2020-2021					2021-2022
<b>SL2 - Fylde - Blackpool Periphery Strategic Location for Development</b>																	
Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	HSS4	08/1049 OL 10/0877 OL 14/0392 RM			351	13	338	60	60	60	60	60	38	278	Persimmon Homes Ltd	None	New application 16/0062/REM 353 homes approved subject to S106and AA 9/1/2017
Cropper Road West, Whitehills	HSS5		442										90	Wainhomes		Application expected shortly	
Land at Lytham St Annes Way, Whitehills	HSS6	11/0639 FULL			67	67	C						0	Redrow	Complete		
		13/0213 FULL			36	36	C						0	Kensington Developments	Complete		
		13/0726 OL			26		26		15	11			26	Kensington	None: developer on-site		
			22								15	7	22	Not identified			
Cropper Road East, Whitehills	MUS1	12/0717 OL 14/0310 RM			145		145	15	30	30	30	30	10	130	Wainhomes	None: developer on-site	
		13/0753 OL			26		26		15	11			26	Not identified			
		15/0114 OL	200								15	30	30	75	Eric Wright Group Ltd	None	
		15/0472 OL			80		80		15	30	30	5	80	Wainhomes	None		
Whyndyke Farm, Preston New Road, Whitehills	MUS2	11/0221 OL		1310						30	60	60	60	210	Not identified		Healthy New Town Government Pilot
Land to the rear of 11-63 Westgate Road, Squires Gate	HS21	08/0992 FULL 12/0499 FULL			70		70	15	30	25			55			See Minor Modification schedule: MNR007	
Former Clock Garage, Preston New Road, Westby	HS22	11/0847 OL			14		14		14				14	Kensington Developments	None	Additional application 15/0891/REM pending	
Land South of Bridgeside, Squires Gate	HS23	13/0231 FULL			22		22	15	7				7	Muir Housing (RSL)	None		
<b>Fylde - Blackpool Periphery Sub Total</b>				<b>664</b>	<b>1310</b>	<b>837</b>	<b>116</b>	<b>721</b>	<b>105</b>				<b>1013</b>				
<b>SL3 - Warton</b>																	
Land Opposite Blackfield End Farm, Warton	HSS2	13/674 OL			360		360		15	30	30	30	30	135	Not identified	None	Being actively marketed
Highgate Park, Lytham Road, Warton	HSS7	12/0550 OL 13/0786 RM 15/706 RM			254	37	217	30	30	30	30	30	30	150	Barratt Homes	None: developer on-site	
Riversleigh Farm, Warton	HS24	13/0526 FULL			82	27	55	30	25				25	Prospect GB Ltd	None: developer on-site		
Nine Acres Nursery, Harbour Lane Phase 1	HS25	10/0766 OL 11/0816 RM			75	65	10	10					0	Taylor Wimpey	Approaching completion		
Georges Garage, Warton	HS26	14/0833 FULL			16		16	15	1				1	Not identified			
Oaklands Caravan Park, 252 Lytham Road, Warton	HS27	15/194 OL		53						15	30	8	53	Not identified			
<b>Warton Sub Total</b>			<b>0</b>	<b>53</b>	<b>787</b>	<b>129</b>	<b>658</b>	<b>85</b>					<b>364</b>				
<b>SL4 - Kirkham and Wesham</b>																	
The Pastures, Fleetwood Road, Wesham	HSS8	11/0763 OL 14/0041 RM 14/0779 OL			262	19	243	30	30	30	30	30	30	150	Rowland Homes	None: developer on-site	
Land North of Blackpool Road, Kirkham	HSS9	12/419 OL 14/613 RM			117	17	100	30	30	30	10		70	Story Homes	None: developer on-site		
		12/0635 OL			180		180		15	30	30	30	30	135	Barratt Homes	None: developer on-site	
		15/0177 FULL	291							15	30	30	30	105	Morris Homes		
Willowfields, Derby Road, Wesham	HSS10	05/0742 RM			124	107	17	17					0	Fairclough Homes	Complete		
Sunnybank Mill, Kirkham	HS28		31								15	16	31	Tyson Construction		New application expected	
Crossacres land between Weeton Road/ Fleetwood Road, Wesham	HS29	05/1060 FULL			13	9	4	4					0	Taylor Woodrow	Complete		
Pennine View, Weeton Road, Wesham	HS30	13/0364 OL			12		12		12				12	Not identified			
Former Fylde Council Offices, Derby Road, Wesham	HS31	13/0449 FULL			24	8	16	16					0	Applethwaite Ltd	Complete		
West End Residential Park, Kirkham	HS32	12/0376 COU		27					15	12			27	Christopher O'Connor		Expansion of existing caravan park: approved pending S106	
Arundel Lodge Nursing Home, 1 Station Road, Wesham	HS33	12/0700 FULL			11	11	C						0	Majestic Properties NW Ltd	Complete		
Crossroads, Kirkham	HS34	08/0891 FULL			12	12	C						0		Complete		
Henthorne Builders, Orders Lane, Kirkham	HS35	09/0822 FULL			26	26	C						0	New Fylde Housing Association	Complete		
St Georges Hotel, Station Road, Kirkham	HS36	12/0505 FULL			11	11	C						0	Melrose Developments	Complete		
<b>Kirkham and Wesham Sub Total</b>			<b>322</b>	<b>27</b>	<b>792</b>	<b>220</b>	<b>572</b>	<b>97</b>					<b>530</b>				

Site	Site Reference	Planning Application number	Allocations	Minded to approve (net)	Planning application commitment (net)	Completion (net)	UC / NS (net)	Five years from adoption					5-year Total	Developer?	Constraints	Notes	
								2016-2017 Current year projected	2017-2018	2018-2019	2019-2020	2020-2021					2021-2022
<b>Non Strategic Locations for Development</b>																	
<b>Freckleton</b>																	
The Refuge, Ruskin Road, Freckleton	HS37	13/0262 OL			13		13					13	Conlon Living Ltd	None	New application 16/0609 : approved		
Land rear of High Meadows, Lower Lane, Freckleton	HS38		13						13			13	Not identified	None			
<b>Elswick</b>																	
<i>Neighbourhood Development Plan allocation</i>				50					10	10	10	10	10		A number of applications pending		
<b>Staining</b>																	
Land South of Chain Lane, Staining	HS39	12/0765 FULL			42	19	23	23				0	Jones Homes	None: developer on-site			
Land at Kings Close, Staining	HS40	13/0590 OL			30		30		15	15		30	Jones Homes	None: developer on-site			
Thornfield Caravan Park, Staining	HS41		28								15	13	Not identified				
Baines Farm, Mill Lane, Staining	HS42	08/0716 FULL			11	11	C					0	Baxter Homes	Complete			
Land Adj to 18 Chain Lane, Staining	HS43	11/0131 FULL 13/0470 FULL			30	30	C					0	Newfield Construction Ltd	Complete			
<b>Wrea Green</b>																	
Land off Willow Drive, Wrea Green	HSS11	15/0458 OL 14/0302 OL			100		100		15	30	30	25		100	Story Homes	None: developer on-site	
Land Adj Richmond Avenue, Wrea Green	HS44	12/0408 OL 13/0097 RM			54	34	20	20						0	Wainhomes	None: developer on-site	
Rear of 54 Bryning Lane, Wrea Green	HS45	12/0456 OL			25		25		15	10				25	Hollinwood Homes Ltd	None	Also 16/0156/FUL approved pending S106 for 36 homes
North View Farm, 22 Ribby Road, Wrea Green	HS46	13/0507 OL			42	4	38	30	8					8	Redrow Homes Ltd	None: developer on-site	
Land North of North View Farm, Wrea Green	HS47	14/0880 OL		15						15				15	Not identified	Application withdrawn	
Former Wareings, Ribby Road, Wrea Green	HS48	10/0709 FULL			13	13	C							0	Redrow Homes Ltd	Complete	
<b>Clifton</b>																	
Land North of Preston Road, Clifton	HS49	15/0763 OL		74						15	30	29		74	Wainhomes	None	Also application 16/0488/REM pending
Land East of Rowan Close, Ash Lane, Clifton	HS50	15/0165 OL		30						15	15			30	Not identified	None	
<b>Newton</b>																	
Newton Hall, School Lane, Newton	HS51		86								15	30		45	Not identified		
Cobweb Barn, Oak Lane, Newton	HS52		29								15	14		29	Not identified	Site edge adjusted, see MNR011	
<b>Singleton</b>																	
Singleton Village, Singleton	HS53	14/0652 OL		15						15				15	Not identified	Application withdrawn	
<b>Weeton</b>																	
The Laurels and Willow House, Mythop Road, Weeton	HS54	12/0772 FULL			20	16	4	4						0	Jones Homes	None: developer on-site	
<b>Greenhalgh</b>																	
The Rowans (Former Blue Anchor Inn), Fleetwood Road, Greenhalgh Phase 1 & 2	HS55	11/0080 FULL 14/0300 FULL			17	14	3	3						0	Kingswood Homes Mr Webster	Complete	
<b>Little Eccleston</b>																	
Sunnydale Nurseries, Garstang Road, Little Eccleston	HS56	15/124 OL			25		25		15	10				25	Wainhomes	Also 16/0817/FUL for 41 homes, likely to increase	
<b>Non Strategic Locations Sub Total</b>				206	134	422	141	281	80						500		
<b>Strategic and Non Strategic Sub Total</b>				1192	1791	4630	923	3707	556	638	694	610	615	528	3085		
<b>Allowances</b>																	
<b>Small site completions</b>																	
<b>Small site commitment and Minded to Approve (unallocated sites)</b>																	
<b>Small sites and Windfall Allowance (unallocated sites)</b>																	
<b>Long Term Empty Homes re-entering market</b>																	
<b>Allowances Sub Total</b>				0	57	458	125	326									
<b>TOTAL</b>				1192	1848	5088	1048	4033									

\*base dated 31 March 2016 (net)

nb: Small site is a site of 9 or less dwellings

nb: Small sites completions - includes non allocated sites and factors in any demolitions

nb: Yearly requirement from year 6 onwards includes the pro-rated shortfall April 2011 - March 2016.

Total Provision	725	781	697	700	568	3471
Yearly requirement	420	420	420	420	420	2100
up or down on yearly requirement	305	361	277	280	148	1371