

## **Fylde Borough Council**

### **Implications of the Housing White Paper for the Fylde Local Plan**

- 1.0 The Housing White Paper at present is a statement draft policy; in the majority of respects, the emerging policy is subject to consultation. There is a small number of announcements within the document, indicating the results of earlier consultations and how those policies will be taken forward. However, no new policies are brought into effect by the White Paper.
- 2.0 The Council considers that nothing within the White Paper leads to any change to the view that the plan is sound as submitted. Whilst the White Paper states the intention to allow plan making to be more flexible by broadening the tests of soundness (paragraph A.18), the current plan fulfils the present requirements.
- 3.0 However, in light of those policy areas where changes have been announced, it is important to consider whether the policies will remain robust in the face of such changes, if and when they occur, in order that the plan's policies remain effective. Consideration of the specific policy proposals follows.
- 4.0 The White Paper (paragraph A.13) proposes that the Framework will require statements of common ground to be developed between neighbouring authorities. The contents proposed for this appear to resemble the contents of the Memorandum of Understanding between the Fylde Coast Authorities and Lancashire. Joint working that Fylde Council has undertaken with Blackpool and Fylde on the Fylde Coast SHMA, which identified the joint Housing Market Area, and joint working to produce the GTAA, provide examples of joint working on housing issues that have required agreement on approach.
- 5.0 The plan already addresses the key strategic priorities that the Framework is proposed to require (paragraph A.16), with the exception of minerals which is a county matter.
- 6.0 The White Paper proposes a standardised methodology (paragraph A.22) for assessing housing requirements, to apply from 2018. In the absence of any announcement as to the methodology itself, the robust approach that the Council has taken to the determination of the housing requirement will be sufficient.
- 7.0 The proposed requirement to plan to meet the needs of older people noted in the White Paper (paragraph A.24) will be met by policy H2, which includes a requirement to provide 20% wheelchair-adaptable dwellings on sites, and a positively-framed criteria-based policy to encourage developments of 100% specialist accommodation to come forward.
- 8.0 The plan will still accord with the presumption in favour of sustainable development if the changes suggested to the wording of the presumption are made (paragraph A.39).
- 9.0 The proposed requirement in the Framework for councils to have policies supporting the development of "windfall" sites (paragraph A.52) is already fulfilled by Policy H3, S1 and DLF1 of the plan. The proposal to require 10% of sites allocated in local plans to be 0.5 ha or less (paragraph A.55) does not clarify whether the percentage refers to the number of sites or the total area. Nevertheless, this would require a change in approach, as in the plan, small sites are not allocated, but are treated as a separate category of "windfalls and small sites", and provided for as an allowance. These represent 12.0% of the housing to be delivered in

the plan, and therefore the plan will meet the new policy's delivery objective. It is not clear how sub-division of the existing sites in the plan would be achieved to sizes below 0.5 ha, whilst still ensuring deliverability. However, moving forward, identification of small sites at plan level could be undertaken for the next review of the plan.

- 10.0 In respect of Green Belts, the clarification that boundaries should only be amended when all other reasonable options for meeting identified housing requirement have been fully examined (paragraph A.61) supports the decision of the council not to review green belt boundaries.
- 11.0 In respect of housing density (paragraph A.68), policy H2 sets a minimum net residential density of 30 dph; this is considered acceptable given the suburban situation of allocated sites in the plan. Provision is made for higher density development where appropriate. In applying flexibility in the application of open-space standards as a constraint on housing density, policy ENV4 will remain robust in the face of this proposed policy as it requires contributions to provide enhancement to existing open spaces where there are sufficient nearby, subject to the usual tests.
- 12.0 In respect of digital infrastructure (paragraph A.89), policy EC2 of the plan supports the roll out of high speed broadband, in line with the proposed new policy.
- 13.0 In relation to affordable housing (paragraph A121), policy H4 of the plan is written on the presumption that a starter homes requirement will be imposed; however the White Paper indicates that this will not now be so. The policy indicates that the remainder of affordable housing, to make the 30% total, should be for social rent or affordable rent; there follows the caveat "unless otherwise specified by the council... The precise requirements for tenure of affordable homes will be negotiated on a case-by-case basis". It is likely that the Council will invoke this clause to include a wider range of tenures in almost all cases, in order to take advantage of the wider range of products proposed by the White Paper to be included within the definition of affordable housing. The Council's current preference is to include a basket of tenures, approximating to 50/50 affordable home ownership products to affordable rented products. The White Paper indicates that the Framework will be altered to include a policy expectation that housing sites will deliver at least 10% affordable home ownership units; it is presumed that these units could be starter homes or other affordable home ownership products: in either case, the policy allows for these as currently written. The Council intends to develop a SPD to assist in the implementation of this policy.
- 14.0 The White Paper proposes positive reforms. Fylde Council has already embraced the government's approach of planning for the right homes in the right places.