

Date: 10<sup>th</sup> March 2017

Consultee ID: 23

Matter 3

## **FYLDE LOCAL PLAN EXAMINATION**

### **Matter 3 – Housing and employment requirements**

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 3 of the *Inspector's Matters, Issues and Questions*.
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Local Plan, dated 22<sup>nd</sup> September 2016. The HBF has also expressed a desire to attend the examination hearing sessions.

### **Issue 5 – Is the identified overall housing requirement of 7,768 dwellings (370 dwellings per annum) over the Plan period justified and consistent with national policy?**

**Q23. Does the Council's evidence support the use of the figure of 370 dwellings per annum (dpa) as its housing requirement in the Plan? In particular:**

**a. Is it a soundly based figure, supported by robust evidence?**

3. No, I refer the Inspector to our comments upon matter 2.

**b. Will it ensure that the Plan meets the full objectively assessed housing needs identified in the SHMA?**

4. No, I refer the Inspector to our comments upon matter 2.

**c. Will it significantly boost housing supply?**

5. The HBF notes that the average level of completions has been approximately 210 dwellings per annum (dpa) since 2003/4 (figure 6 *Housing Requirements Paper*, exam ref: ED017). There has, however been significant variation over this period with net completions significantly higher in some years. The proposed housing requirement of 370dpa would therefore appear to be a significant boost upon this past rate of development. This must, however, be viewed in the context of a housing

moratorium. It should also be noted that this average level of delivery was significantly below the housing target for Fylde provided by the now revoked North West Regional Spatial Strategy.

6. Furthermore the primary concern for the plan should be to ensure that the objectively assessed needs are met in full. I refer to our comments upon matter 2 in this regard.

**Q24. The soundness of specific land allocations and deliverability of sites to meet the housing requirement will be considered at Stage 2 of the Examination. However, on the basis of the Plan as submitted does it confirm that there is:**

**a. a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption; and**

7. The HBF has not fully scrutinised the supply identified in the appendix to examination document EL1.001b. It is, however, noted that in response to the Inspector's question 6 the Council considers it can demonstrate a deliverable five year supply. This appears to be highly reliant upon a significant number of the allocations within the plan delivering within the first five years. Whilst the HBF does not wish to comment upon this likelihood the Council should seek assurances from the relevant developers in relation to these sites.

**b. a supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?**

8. The HBF has a number of concerns in relation to the overall supply. These are highlighted within our response to the Publication version of the plan (paragraphs 41 to 52). The HBF is unaware of any further evidence to allay our concerns and as such they are still considered valid. In aid of brevity they are not repeated here.

**c. If you contend that the plan would not provide for either (a) or (b) above (or both) could the Plan be appropriately modified to address this?**

9. The HBF recommends greater flexibility be introduced into the plan through additional allocations. This would not only provide greater potential for the plan to meet, in full, its housing requirement but would also be in conformity with the NPPF requirement for plans to be positively prepared and provide flexibility and choice. It is not considered that the current buffer of just 123 dwellings provides such comfort particularly given the uncertain status of many of the sources of supply.

10. The current lack of flexibility is also concerning given that the *Housing Requirements Paper* (exam ref: ED017) clearly identifies (para. 121) that many commitments within Fylde are not progressed to completions.

11. The inclusion of a buffer, dependent upon its scale, may also assist in addressing some of the unmet housing needs emanating from Wyre (see our matter 1 statement).

**Issue 6 – Whether the amount of employment land (60.6 ha gross as set out in Policy DLF1 and 62 ha net in Policy EC1) is appropriate to meet the objectively assessed needs of the Borough.**

12. The HBF has no further comments upon this issue.

Yours sincerely,

*MJ Good*

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