
Fylde Local Plan Examination March 2017
Matters, Issues & Questions (MIQ)

Mactaggart & Mickel Homes Ltd (ref : 34)

Matter 3 – Housing Requirements

Matter 4 – Vision, Objectives and Develop Strategy

WRITTEN STATEMENT

MACTAGGART & MICKEL

Matter 3 – HOUSING REQUIREMENTS

Issue 5: Is the identified overall housing requirement of 7,768 dwellings (370 pa) over the Plan period justified and consistent with national policy?

23 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?*
- b. Will it ensure that the Plan meets the full objectively assessed housing needs identified in the SHMA?*
- c. Will it significantly boost housing supply?*

In considering the above question it is difficult to argue that the figure of 370 units pa is not soundly based, as it presents a realistic target to attain the 7,768 units required over the plan period to 2032.

The fully objectively assessed need takes account of the population changes and considerations, economic and employment prospects, affordable housing requirements to arrive at an objectively assessed need via the SHMA. This details an approximate range of between 300-420 per annum. To arrive at 370 pa seems a reasonable number in seeking to meet the objectively assessed housing need in this context.

In terms of backlog, however, it is important going forward that any backlog of need emerges as future growth and is not simply unaccounted for, as it is evident that Fylde Borough have seen a historical under-provision of housing supply against the housing requirement established under the previous RSS.

To seek to attain 370 units pa will boost housing supply, whether that is significant or not is open to debate. Measured against the historic completions achieved it will be 'significant' as detailed in the Housing Land Availability Schedule 2016 (ED018) on page 2, there was only one year from 2003 where this figure has been passed, 394 units in 2007/8. Since 2012, 370 units pa would have required 1480 units to 2016 (370 x 4 years), however, only 907 units were completed over this period. This in turn has increased the annual requirement, with this under provision to date/backlog to 404 units pa (370 x 17 + 573 unit under provision) using the Liverpool method or 485 units pa (370 x 5 + 573 divided by 5) by the Sedgfield method

of meeting backlog over the next five years. On this basis, the Local Plan requires to significantly boost housing supply, particularly in the short term, which as the evidence points towards, is urgently required.

24. *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*
 - b. *a supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?*
 - 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?*

In terms of part a) of the question posed above, the NPPF is quite clear on the issue of deliverability in terms of seeking to significantly boost the supply of housing, there requires to be sufficient deliverable sites to provide a minimum of five years' worth of housing. Regrettably Fylde Council have consistently failed to meet this requirement, over the last ten years, of ensuring there is a minimum five year housing requirement. In this regard and consistent with paragraph 47 of the NPPF Fylde Borough have had to provide a buffer of 20%, due to consistent under performance in the supply of new homes.

The view of Mactaggart & Mickel is that Fylde Borough are still failing to grasp this matter via the allocated sites in the Local Plan. There are not enough smaller non-strategic sites allocated, of under 100 units or thereabouts. that could significantly boost the supply of housing in the short term to ensure that the five year housing requirement is met each year going forward. This is especially important once the Local Plan is adopted.

With regard to part b) there is a distinct reliance on larger strategic sites in the Local Plan and Mactaggart & Mickel believe that these will not all contribute in the first five years of the Local Plan, as inevitably a few strategic sites will slip in terms of timescale or not deliver the housing units anticipated. However, these sites will be largely deliverable in the medium term and will contribute distinct housing unit numbers in years 6-10 from the point of adoption.

Mactaggart and Mickel contend that the answer to part c) is that the Local Plan allocates a greater number of smaller non-strategic sites of 100 units or under to address this matter and thereby ensuring that a minimum five year supply of housing is provided on a consistent

basis over the first five years of the Local Plan. In this regard Mactaggart & Mickel have a site for approximately 50 units at Moss Side Lane, Wrea Green that is deliverable within the first five years of the plan period. The site specific considerations of this potential housing site can be examined in Stage 2 of the Local Plan Examination.

Matter 4 – VISION, OBJECTIVES & DEVELOPMENT STRATEGY

Issue 7 – Have the vision and strategic objectives within the Plan been positively prepared; are they justified and consistent with national policy and can they realistically be achieved?

26. *Does the Plan set out a positive vision for the future development of the area?*

The Vision set out in Chapter Three of the Local Plan is lengthy and lacks focus. In this regard, it is considered that it should be re-drafted with bullet points to achieve attainable aims that can be easily measured.

It is suggested that in terms of housing the vision should be quite clear;

“Fylde Borough will ensure that a minimum of 7,768 new homes will be built in the Council area by 2032 to meet their housing requirement in full.

The Council will commit to providing a minimum five year housing land supply annually going forward and from the date of adoption of the Local Plan.”

As detailed in the answer to the preceding question, the Mactaggart & Mickel view is that the Local Plan is not as positive as it requires to be in allocating smaller, non-strategic housing sites for development. There appears to be a marked reluctance to positively plan to meet the housing requirement and the vision is not as forthright as is required.

Issue 8 – Does the overarching development strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development within the Borough?

26 *The Plan states that the development strategy locates 83.6% of housing developments within the four strategic locations over the Plan period and 9.7% in non-strategic locations.*

a. *Is this strategy and the distribution of development within the Plan period justified? Are the strategic and non-strategic locations soundly based and supported by robust evidence?*

- b. *Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for Fylde?*
- c. *Is the development strategy clearly defined within the Plan? Does Policy DLF1 clearly set out the distribution of development?*

In terms of part a) of the above question, Mactaggart & Mickel believe that there is an over concentration in the one of the four main strategic locations identified for future growth/development. Whilst recognising that Lytham/St Annes and Kirkham are the principle (key service centre) settlements where a significant concentration of development should be located and the role of Warton (local service centre) is also acknowledged, these settlements offer a range of services, community facilities/provision and transport options that make them inherently sustainable. However, the significant level of strategic residential led development for the Blackpool Periphery is excessive, 2,311 units over the plan period equating to 29.75% of the total Local Plans housing requirement. This area does not relate as well to Fylde Borough and its settlement hierarchy and does cater for the greater expansion of Blackpool within Fylde, due to the distance from other Fylde settlements and Blackpool Town Centre, it is not felt that this level of development is as inherently sustainable.

The concentration overall of 83.6% of the housing requirement in these four strategic locations is not considered prudent. The view of Mactaggart & Mickel, whilst recognising that these four areas will naturally accommodate the majority of future development, is that this should not exceed 75% of the overall requirement. Linking the above paragraph with this, it is considered that the level of development in the Blackpool Periphery area should be curtailed and or reduced. Indeed, a number of the larger development are not scheduled to commence providing houses to 2019 and 2021 (MUS2 – Whyndyke Farm 810 units & HSS5 – Copper Road West 442 units) and there should be a greater distribution of the remaining 25% of the housing requirement to non-strategic locations for deliverable sites in the five year period following adoption of the Local Plan.

The currently proposed 9.7% of the housing requirement being met in the non-strategic locations is derisory and should, as detailed above, be increased to 25%. The missing 6.7% of the currently proposed housing requirement, which is not attributed to either and is considered as windfall, should be allocated. If a Local Plan is to provide certainty for local communities and developers as to where growth will occur, this should be directed via allocations in the Local Plan. Windfall allowance should be precisely that and adds a layer of flexibility for small sites and unplanned growth that should not be accommodated within

meeting the overall housing requirement figures but which will contribute to and benefit the five year land supply.

Therefore, drawing these points together in part b) of the question posed, it is not considered that the current development strategy will achieve the Council's vision and strategic objectives for sustainable development for Fylde in full. Mactaggart & Mickel are of the view that with a slight re-emphasise, in broadening the number and level/percentage of non-strategic sites that are deliverable in the short term, that this adjustment will in fact ensure that the development strategy of the Local Plan has its best prospect of being met in full by 2032.