

## STATEMENT IN RESPONSE TO MIQ: Fred Moor (Ref: 14)

My representations (SD013a page 184-198) addressed both strategic and non strategic matters. I have excluded the non strategic ones below.

Several Strategic Matters could fit in more than one heading. I have used what seems the best fit.

MATTER 1: COMPLIANCE WITH STATUTORY PROCEDURES AND LEGAL MATTERS	
Issue 1	<p>Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?</p> <p>fm Summary: (H3 and H4 Paras 10.56 to 10.75 and especially H3) Conversion and Change of Use to Residential in South Blackpool</p>
<p>FM (14) Statement. Nothing to add to my written statement.</p>	
Issue 2	<p>Has the Plan been positively prepared in accordance with other legal and procedural requirements?</p>
<p>FM (14) Statement: No comment</p>	
MATTER 2: OBJECTIVELY ASSESSED HOUSING AND ECONOMIC DEVELOPMENT NEEDS	
Issue 3	<p>Is the identified objectively assessed housing need (OAHN) soundly based and supported by robust and credible evidence and is it consistent with national policy?</p> <p>fm Summary: (DLF1) Bad interpretation of base data and the 'Vision' has delivered the wrong conclusions on housing need and employment land numbers</p>
<p>FM (14) Statement:</p> <p>1. Erroneous Housing Need</p> <p>Around 2000, Fylde's housing policy was 'failing.' Government inspectors arrived to take control. Government said Fylde was not paying enough attention to social rented housing. A relatively affluent, predominantly owner-occupied electorate had not placed social housing high on Fylde's agenda. However, for Government it had become a central policy aim.</p> <p>As a result, in 2002, the then (new) Chief Executive embarked on a plan to 'rebalance' Fylde's population by creating vastly more social rented ('affordable') housing. He engaged a company called Fordham to research housing in Fylde.</p> <p>The pre-study description of this work was an "Assessment of Housing Need and Desire". The post-study name dropped the "and Desire" and the survey became known as Fylde's 'Survey of Housing Need'.</p> <p>It found that the overriding need was for social rented housing (which it claimed to be a massive 97% of identified need for housing in Fylde). The conclusion was that only 3% was needed for traditional housing. The rest needed to be socially subsidised housing.</p> <p>Fylde's present Local Plan says (Chapter3: Housing) demonstrates the local plan officer's difficulty in reconciling this situation at the time. It says</p> <p>"3.22 The consultant's report was received in Spring 2003 and demonstrated very high levels of need over the five year period from 2002 to 2007. This was quantified as a shortfall of 345 affordable dwellings per year. In Spring 2004, the consultant's report was up-dated taking into account the results of the 2001 Census. In the later report the annual need for affordable housing was adjusted to 420 dwellings per year. This annual need will be subject to regular monitoring in</p>	

the light of local circumstances and changes identified within the wider housing market area, of which the borough forms a part.

3.25 The annual need for affordable dwellings found by the Survey very substantially exceeds the overall housing provision of 155 dwellings per annum for the borough made in the Joint Lancashire Structure Plan (2005)....."

So Lancashire County Council's 'Joint Lancashire Structure Plan' (2001 to 2016) showed that Fylde had an annual need for just 155 dwellings of \*all types\* and the Fordham report said it needed a preposterous 420 affordable dwellings.

The reason for this dichotomy was the "and Need" element of the survey. When private sector renters were asked if they would prefer to pay a lower (subsidised) rent, a lot of hands went up. Desire was conflated with need and the number rocketed. 'Rebalancing' of Fylde's demographic had begun.

At a plan inquiry, Fordham admitted that the practical solution to the affordable housing numbers was actually trivial, and only between one and ten percent of that figure, i.e. only a maximum of 42 new 'Affordable (subsidised) Houses' were actually needed each year, not 420. It was further explained that the survey had been intended only for 'benchmarking' purposes, not to assess real housing need.

Yet the results of Fordham's study became incorporated into Fylde's local plan.

On 10.4.08 Fylde considered the conclusions from the 2007 update of Fordham's 2002 'Housing Needs Survey'. Those conclusions said the annual net need for affordable housing was then 568 dwelling compared with 420 in 2002. It also noted that the assessment figure was very close to the assessment provided by DTZ in the draft Strategic Housing Market Assessment (of 610 dwellings).

The continuing updating and misuse of the Fordham figures created a false need for affordable dwellings in Fylde (by a factor of 10 times). This fed into the overall numbers in Fylde's existing local plan, and that has led to a skewed and grossly distorted real overall housing need. I argue this need cannot be considered a sound basis.

## 2. Erroneous Interpretation of Employment Land Need

I believe this matter is being addressed by Mr Guest. I am happy to defer to him. However, I point out the connections and assumptions Fylde has made about future need for employment land and jobs justifying an increase in housing numbers would also need to be adjusted if, as I believe, the employment projections are shown to be based on a false interpretation of the need for employment land.

## 3. Over enthusiastic Vision for housing growth

The present (2017) SD001 Chapter 3 Vision Paragraph 2 begins "Fylde will have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of sustainable homes and economic growth within the four Strategic Locations for Development,..."

This part of the vision actually began life in 2012 as: "It will have continued to develop as a dynamic, prosperous community through the delivery of sustainable housing and employment growth..."

In 2013, it said Fylde will have continued to develop as a dynamic, prosperous community through **boosting** the delivery of sustainable homes and employment growth..."

This change of vision to \*boosting\* (rather than simply 'delivering') housing numbers and economic growth is primarily what has driven Fylde to adopt housing numbers at the top end of the evidential range - rather than taking a sounder, more balanced perspective. It is also helping to drive an economic agenda that most of the published range of economic modelling evidence does not support.

It is a vision for housing that 41% of Fylde's councillors were unable to support, and refused to endorse. (Ref: Minority Report June 2013).

It is the same vision for economic growth that was cited by the seven members of Fylde's Policy Development Scrutiny Committee (10th Sep 2014) who, in a second (employment land) Minority Report (Sept 2014) claimed: (Para 47). "But a policy showing the need for less employment land in the future does not appear to square with the growth in employment that Fylde has as its vision - as the officers have said in their response to Mr Guest."

The relevant part of that officer response to Mr Guest (set out in that Employment Land And Premises Minority Report Sep 2014, Page 22) says: "Paragraph 10.39 of the FELPS explains why BE Group have recommended using the historic take-up trends. Ultimately, in other comparable local authority areas they have discounted the use of employment and labour supply models which have generated unusually negative outcomes. From a Fylde perspective negative outcomes do not square with the vision in the Fylde Local Plan to 2030, Part 1 - Preferred Options (June 2013)." (my emboldening)

I believe this response illustrates Fylde's reliance on its vision to discount or disregard outcomes which conflict with it. That vision is not evidence, yet it is defining the plan outcome.

I argue that Fylde's vision to boost housing numbers and economic growth - which is not widely supported within the Council - is the fundamental driver for the local plan in terms of housing numbers and employment land, and the Council should have sought a more sound and balanced interpretation of the evidence presented to it. One that is more credible, more robust, and could attract support from more than 59% of its Councillors.

<b>Issue 4</b>	<a href="#">Are the objectively assessed economic development needs clearly identified, supported by robust and credible evidence and consistent with national policy?</a> fm Summary: (EC1) Basis for choosing employment land needed
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FM (14) Statement:

I am happy to have my representations within these matters addressed by Mr Guest if he is able to attend. If not, I should like to make a brief case, and introduce two MP's letters regarding the weight attached to Warton Enterprise Zone's. (letters attached).

<b>Issue 4 (Cont)</b>	fm Summary: (GD8) Designation of 'holiday areas'
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FM (14) Statement:

I understand Fylde's desire to diversify its economy. Reliance on a handful of major industrial employees, and heavy dependence on tourism in the coastal zone presents a risk.

However, such diversification should be positive, not negative. It is counterproductive to diversify by seeking to damage and weaken the existing tourism industry by, for example, removing the existing concepts of primary and secondary holiday areas. I argue that this categorisation should remain.

Equally, the defined tourism area should include (as it does at present) areas of the North Promenade in St Annes (Glendower Best Western Hotel, Monterey Hotel, various holiday flats etc).

Proposals such as these that weaken the safeguarding of tourism areas and seek to actively diversify away from the third largest industry in the area (as opposed to positive diversification into a wider range of other employment opportunities) are unsound, and should be changed or deleted.

<b>Issue 4 (Cont)</b>	fm Summary: (EC7) Tourism Accommodation. Propose retain present policies
<p>FM (14) Statement (a):</p> <p>No satisfactory evidence has been produced for the current proposal to delete the concept of secondary holiday areas set out in the existing local plan. The concept should remain to permit more flexibility for example on the periphery of primary holiday areas</p> <p>FM (14) Statement (b):</p> <p>No evidence has been produced to justify the proposed weakening of the present TREC1 policy which prohibits change of use in designated areas in order to safeguard of the stock of Tourist accommodation and the identity and character of primary holiday areas.</p> <p>TREC1 says "The provision of new hotels, guest houses, holiday flats and extensions of existing facilities will be permitted in the primary holiday areas. The development of and change of use to new non-tourism related uses including rest homes, nursing homes, residential flats and offices will not be permitted in order to maintain the character and appearance of this predominantly tourist area."</p> <p>The proposed wording of EC7 - which reduces this safeguard to "Non serviced tourism accommodation uses in these areas will be resisted" is not a sufficiently strong statement to maintain the character of the area and the integrity of the critical mass of the holiday areas.</p>	
<p><b>MATTER 3: HOUSING &amp; EMPLOYMENT REQUIREMENTS</b></p>	
<b>Issue 5</b>	Is the identified overall housing requirement of 7,768 dwellings (370 dwellings per annum) over the Plan period justified and consistent with national policy?
<p>fm Summary: (Chapter 10 - Inc H1 and H4). Housing numbers</p>	
<p>FM (14) Statement (a):</p> <p>Here I address the arguments of the (then) Council Leader and the (then) Portfolio Holder for Planning who set out five chief arguments in a letter to Fylde's MP, and sought his support to convince Government that the five year housing supply figure for Fylde should be 1,170.</p> <p>Their argument is principally based on the average actually delivery rate for the last 10 years of 195 new dwellings that was claimed to have more than met the need in the market – as evidenced by the availability of new and existing dwellings.</p> <p>A copy of the letter is attached as an appendix.</p> <p>Its first argument uses historic data over the last 10 years to argue the average real terms provision of new houses to the market over that term was 195 dwellings a year. It further argues that the 10 year average is robust and sound evidence of an annual figure to meet housing need.</p> <p>Its second argument concludes that the supply is more than adequate to meet housing need, and that supply is outstripping demand in the current market.</p> <p>The third argument notes that between April 2012 and March 2013 approvals were granted for 1,630 dwellings most of which would start in the next 12 months, and another major development for approximately 1,500 dwellings was due to be determined before next April. It argues this is robust evidence that Fylde Council is clearly supporting the national growth agenda.</p> <p>The fourth argument notes the ONS data that Fylde's population has remained relatively static over a seven year period since 2007, and in fact, the total population has decreased by 380, but during the same period 1,287 new dwellings have been completed (ave = 184 per annum) which represents an oversupply of housing provision into the market.</p>	

The fifth argument argues that growth is supported in Fylde, but public opinion has been unanimously against unnecessarily high housing numbers.

It concludes that the five year housing supply figure for Fylde should be 1,170 or 195 new dwellings per year. (= 4,095 over the current plan term)

The former LCC Joint Structure plan set a number of 155 dwellings a year (= 3,255 over the current plan term)

Fylde's currently proposed number is 376 homes over 21 years (= 7,896 over the current plan term)

I find myself in agreement with much of the letter and report from the Leader and Portfolio Holder and I ask the Inspector to note the content.

FM (14) Statement (b):

Addresses the practical drivers for housing: Demographics, Households, Migration and argues for a more local emphasis for Migration numbers.

Demographics. Fylde has a hugely skewed demographic toward the elderly. The coastal strip holds about two thirds of Fylde's population where the elderly demographic is much more pronounced. More people are dying than are being born. On the basis of demographics we should not be building any more houses, and the current population decline would require 64 dwellings a year to be demolished to match need.

Households. In 2004 the FT showed how the average number of persons per household had been, (and was expected to continue to be) in decline as the growth in single households increased, and the number of couples reduced. This consequence of social policy is a key driver of local housing need. Separation and divorce \*double\* the number of residences that a community of two parent families need. Natural fragmentation of families as young adults leave adds further to this. In Fylde, it overrides population decline and produces a net housing need.

Migration. Is probably the biggest overall driver. People like to live here, and there is significant demand for a seaside retirement property from people in say, east Lancashire, or Manchester or elsewhere.

However, local people ought not to have a duty (or even a responsibility) to damage or destroy areas of their countryside and their quality of life to meet the needs of inward migration. Quite the contrary, like the poorly regulated residential developments in Spanish sunspots, a poorly regulated attraction becomes a fatal attraction, and results in denial of the character that made the area attractive in the first place. It can only be right that a \*local\* plan is allowed to limit, if not prevent, the sort of damage to its housing market that we have seen in the Spanish housing market, where post-building-boom falling property values have trapped homeowners into modern property developments they cannot now afford to sell.

So I argue for a further review of the housing numbers in Fylde with a particular look at reducing or restricting numbers relating to inward migration in order to protect Fylde's current environment and character.

I believe this is justifiable using the same sort of historical basis proposed by the Leader and Portfolio Holder. This itself, is nothing more than Fylde's own reason to choose the historical basis when calculating its employment land vis ["Paragraph 10.39 of the FELPS explains why BE Group have recommended using the historic take-up trends. Ultimately, in other comparable local authority areas they have discounted the use of employment and labour supply models which have generated unusually negative outcomes"](#)

In the case of housing numbers I see two negative outcomes, firstly the damage to the environment and character of Fylde, and secondly the issue noted in ED021 page 111 para 7.48 which recognises [that "The continuation of historical levels of average migration will, based on the](#)

modelling, not facilitate a growth of the local economy reflecting the ageing population as considered in the analysis in section 5." Inward migration by those of retirement age will not facilitate growth in the local economy that Fylde seeks.

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.
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FM (14) Statement  
 I do not need to add to my written representations on this matter and I defer to Mr Guest's representations on the matter of employment land.

**MATTER 4: VISION, OBJECTIVES AND 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? fm Summary: (Chapters 3 and 4) Vision and Strategic Objectives
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FM (14) Statement (a):  
 Nothing to add to my written representation regarding the use or aspirational and euphoric language and excessive reliance on this Vision (which is not objective evidence nor widely supported by the whole Council) to justify a boost to 'growth'.

FM (14) Statement (b):  
 The vision fails to recognise and value agricultural land as per my written representation. I regard it as a disgrace that Fylde pays such little regard to what is geographically the biggest land use in the area. The Council should know far better than it does where the best and most versatile farm land is located and its vision should commit to a local assessment.

Issue 7 (Cont)	fm Summary: (NP1) Presumption in favour of sustainable development wording
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FM (14) Statement:  
 I genuinely believe Fylde could save time and money by involving residents as well as developers as per my written representation.

Issue 7 (Cont)	fm Summary: (ENV5 - my representation 1) Registered Historic Parks and Gardens Clarity of wording
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FM (14) Statement:  
 As per (1) in my written representation on this matter. Harming the significance sounds like, but is not the same as, causing significant harm. More clarity should be provided.

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
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FM (14) Statement:  
 No observations