



Fylde Council Local Plan - Examination

Stage 1 Matter 2

Consultee ID: 9 Johnson Mowat on behalf of Carrington Group

This hearing statement is made on behalf of Carrington Group, who have land interests on land south of Mains Lane, Poulton-le-Fylde. Representations were made in September 2016 to the Publication version of the Local Plan.

Matter 2 – Objectively assessed housing and economic development needs

Issue 3 – Is the identified objectively assessed housing need (OAHN) soundly based and supported by robust and credible evidence and is it consistent with national policy?

Q11. Does the identified Fylde coast HMA provide a robust and appropriate basis for assessing housing needs?

We consider, along with HBF, that the Fylde Coast Housing Market Assessment Study and Addendums provide a robust and appropriate evidence base for assessing housing needs.

Q12. The SHMA and its Addendums identify the OAN figure for Fylde as a range, based on the 2012-based sub-national household projections (SNHP). The DCLG released its 2014-based SNHP in July 2016. The Council refers to there being only a 1% difference in projected household numbers between the 2012 and 2014-based projections, though this is over slightly different timescales. Further to my initial questions to the Council (E11.001a), its response (EL1.001b) indicates that the actual increase is less than 1% taking account of the different periods and it is not considered that this has any significant implications for the OAHN. Is this justified by the evidence? Is the use of the 2012-based sub-national household projections as a ‘starting point’ for identifying the OAHN appropriate? What bearing, if any, would the latest household projections have on the assessment of the OAHN?

As stated in our September 2016 response to the Publication draft Local Plan the scenarios should be re-run using the 2014 based SNHP as the starting point. National guidance is clear that wherever possible the most up to date projections should be used. We consider there has been adequate time to consider the latest 2014 SNHP since their release in July 2016 and formulate an up to date OAHN.

Carrington Group maintain their support of the evidence presented by the HBF in relation to the OAHN. The Council's response to the Inspector's initial questions states that the 2014 SNHP would not have any significant implications for the OAN and the housing requirement in the Plan. We disagree with this suggestion and refer to the HBF evidence which states that the Council's reference to a less than 1% change does not take into consideration the effect of the change on the various scenarios used to derive the OAHN figure or any variation in the demographic profile of the two projections.



We do not consider it is appropriate to use the 2012-based SNHP as a starting point and conclude that the 2014 SNHP is the most appropriate starting point.

Q13. Is the OAHN range of figures identified in the SHMA soundly based?

We consider the OAHN range of figures are soundly based, however they should be re-run using the latest 2014 SNHP. Should the OAHN range not be updated and the 2012 based range remain, we maintain our view that the housing requirement in the Local Plan is increased towards the upper end of the range (440 – 450 dph).

Q14. Does the assessment of OAHN take significant account of market signals as well as other market indicators in relation to the balance between the demand for and supply for housing?

This is a question for the Council to answer. The Fylde Coast SHMA Addendum 2 (Section 4) appears to have taken account of market signals based on the six market signals identified in the PPG (House prices; Rents; Affordability; Rate of development; Land prices; and Overcrowding).

Q15. Has the assessment of OAHN taken account of other factors including vacancy rates and second homes?

This is a question for the Council to answer. Appendix 3 of the Fylde Coast SHMA Addendum 2 (Edge Analytics Data inputs, assumptions and methodology) appears to have taken into account vacancy rates, however it is unclear if second homes have been taken into account.

Q16. In relation to affordable housing:

a. Is the SHMA's methodology for assessing affordable housing needs robust and in line with Government guidance?

No comment

b. The Plan recognises that the full amount of affordable housing needed per annum is not deliverable. Has the Council considered the option of a higher housing requirement to assist in delivering more affordable dwellings?

We align ourselves with the HBF comments. There is little consideration of what the impact would be of a higher housing requirement which would help meet the affordable housing needs. There does not seem to be any justifiable reason for not increasing the housing requirement in order to assist in delivering more affordable housing as a proportion of the overall requirement. Paragraph 47 of the Framework requires local authorities to meet the objectively assessed needs of market and affordable housing. The PPG is clear in its advice that “an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”



Q17. Have the needs of particular groups (e.g. the elderly) and types of housing (e.g. private rented, self-build) been satisfactorily assessed?

No comment

Q18. Have employment trends been appropriately taken into account? Is the OAHN aligned with forecasts for jobs growth?

Employment trends have been taken into account in the SHMA however the Local Plan housing requirement does not align with the SHMA findings. We support the evidence presented by the HBF which questions how the 370 dpa represents an 'optimum balance' as stated by the Council in the Housing Requirement Paper.

We note the SHMA Addendum 2 concludes at paragraph 5.28 that

“as the Addendum 1 report concludes the upper end of the range would represent OAN on the basis of the considered economic position within the Council’s evidence base. It is recognised that the authority’s current economic evidence base will continue to be updated and this will therefore need to be considered carefully alongside subsequent updates of the analysis of housing need.”

Should the figures be re-appraised based on the 2014 SNHP the upper end of the range is likely to be higher than 440 – 450 dpa.

Issue 4 – Are the objectively assessed economic development needs clearly identified, supported by robust and credible evidence and consistent with national policy?

Our collective response to Issue 3 answers this issue. It is the Council’s role to explain the job needs and role of Fylde economically, and explain the objectively assessed economic development need for the Borough.