



Fylde Council Local Plan - Examination

Stage 1 Matter 3

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 3 – Housing and employment requirements

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?*

We do not consider the housing figure is soundly based when assessed against the soundness tests at paragraph 182 of the Framework. Please refer to our response in relation to Matter 2. The Fylde Coast SHMA should be updated using the 2014 SNHP. We consider the housing requirement in the Plan should be increased towards the upper end of the range.

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

We refer to our comments in relation to Matter 2. In the first instance the SHMA should be updated using the 2014 SNHP. The housing requirement does not take account of seeking to meet unmet need in Wyre Borough. Affordable housing needs are not met by the 370 dpa figure.

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

Whilst it will no doubt boost housing supply compared with past rates of development, we maintain our view that the 370 dpa figure is too low. We refer to our comments in response to Matter 2 and the evidence put forward by the HBF.

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*



The Council's response to the Inspectors initial questions (Question 6) reveals the summary of the 5 year land supply position and shows a considerable surplus against the requirement. There are a number of large sites which are heavily relied on to deliver year on year within the first five years in order to meet the 5 year requirement. Whilst we have not assessed individual sites, we would question the deliverability of the quantum of sites in the first 5 years. There does not appear to be a factor included in the 5 year supply information for the non-implementation and non-delivery of permitted sites.

The above comments are not withstanding our view that the housing requirement should be higher, in which case the 5 year housing position will be considerably different.

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

We note and support the concerns of the HBF in relation to the overall supply of housing. There does not appear to be any new evidence since the Publication Plan in relation to the housing supply information. Should the housing requirement be increased to 440 to 450 dpa the overall housing requirement would be between 9,240 and 9,450 net additional dwellings. The supply position falls some way short of this.

The housing trajectory contained in Appendix 2 of the Plan clearly shows a shortfall against the requirement in years 7 – 15 (assuming the Plan is adopted in 2017/18 and therefore is considered to be Year 1).

There is not a reasonable buffer of sites to allow for flexibility within the Plan, nor any additional sites to meet the unmet needs from Wyre Borough.

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?

The allocation of additional sites would provide greater flexibility, and would give a greater chance of the Plan to meet, in full, its housing requirement. This would be in accordance with the Framework requirement for plans to be positively prepared and provide for flexibility and choice in the market.