

Date: June 2017

Consultee ID: 23

Matter 5

FYLDE LOCAL PLAN EXAMINATION

Matter 5 – Housing: Site Allocations and Delivery

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 5 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 22nd September 2016. The HBF has also expressed a desire to participate in the examination hearing sessions.

Issue 9 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing that is justified, effective and consistent with national policy?

Q1: In relation to the 5 year supply does the Plan clearly set out annual targets, completions to date, the approach to catching up the shortfall and the buffer to be applied?

3. The HBF notes the text at paragraph 10.15 of the submitted plan. This paragraph does not provide sufficient detail and further clarity would be welcomed.
4. The Council's 2015-2016 *Authority Monitoring Report* (ED008, page 40) identifies that within Fylde a 20% buffer, in compliance with the NPPF (paragraph 47), is required. The HBF agrees with this stance given the record of under-delivery within Fylde as highlighted by the *Housing Land Availability Schedule* (EB018, page 2) and *Housing Requirement Paper* (EB017, appendix 1).
5. The *Authority Monitoring Report* (ED008, page 40) also seeks to deal with the accrued under-delivery since the start of the plan period over the first five years and apply the 20% buffer to both the under-delivery and housing requirement. Once

again the HBF agrees. This methodology which conforms with the PPG (ID 3-035) and PAS guidance¹.

6. The Council's latest '*Interim Five Year Housing Supply Statement*' published 28th February 2017 also applies the same methodology and includes a 10% discount for none-implementation, again the HBF agrees with this stance. The Council's calculation of the five year housing land supply within this document indicates 5.58 years housing land supply within Fylde. This is, however, based upon a housing requirement figure of 370dpa. Given that the Council is now suggesting an OAN range of 410 to 430dpa (Table 1, EL5.003f) and is suggesting an amendment to Policy DLF1, to a requirement of 415dpa, this figure needs to be updated.
7. The following tables utilise the Councils methodology and evidence upon supply and delivery (EL5.003g) to identify the current five year supply position utilising an OAN of 415dpa (scenario 1) and the upper end of the OAN range 430dpa (scenario 2).

Five year requirement	Scenario 1	Scenario 2
Annual housing requirement	415	430
Shortfall since start of plan period	952	1,042
5 year requirement and shortfall	3,027	3,192
Adjusted 5 year requirement including 20% buffer	3,632	3,830
Adjusted annualised requirement	726	766

Five year Supply	Scenario 1	Scenario 2
Adjusted 5 year requirement	3,632	3,830
Identified supply	3,874	3,874
10% allowance for supply not coming forward	387	387
Total supply	3,487	3,487
Over / Under Supply	-145	-343
Equivalent years supply	4.8	4.6

8. The above tables clearly demonstrate that, based upon the Council's own evidence, it will not be able to demonstrate a deliverable five year supply upon adoption. To remedy this situation we recommend further allocations are provided. These should

¹ Planning Advisory Service: Five Year Land Supply FAQ (<http://www.local.gov.uk/pas/policies-plans/local-planning/five-year-land-supply-faq>)

provide sufficient capacity not only to meet the current shortfall but also provide necessary flexibility over the remainder of the plan period²

Q2: Appendix 2 of the Plan includes a housing trajectory for the Plan period. In light of the Council's recent evidence this is proposed to be updated. However is it necessary to include site specific details given it may quickly become out of date? Should a housing trajectory graph be included in the Plan?

9. The inclusion of a housing trajectory graph would add further clarity to the plan.

Site Allocations - Policies SL1-SL5

Q3 – Q8:

10. The HBF has no further comments at this stage.

Policy H1

Q9: H1b refers to performance monitoring in relation to housing delivery. Can the Council clarify the purpose of the rolling 3 year review period and how 'the delivery of uncommitted sites will be adjusted' if completions targets are missed by 20%? Is this justified and effective?

11. The HBF would welcome further clarification upon this point. If targets are being missed the Council will need to take remedial action, this may include a partial plan review and / or the identification of further housing sites. Identified triggers for such a review process would be welcomed.

12. It should also be noted that the Government's recent Housing White Paper³ suggests that a delivery test will be placed upon Local Planning Authorities. This will require action to be taken if delivery falls below 95% of the Council's annual housing requirement. The Council will need to consider the implications of the delivery test.

Policy H2 - Density and mix of new residential development

Q10: A minimum density of 30 dph is proposed under Policy H2. Is this justified across all development sites, whether small or large?

13. No, the HBF does not consider this justified by the evidence, nor does it take account of individual site or locality characteristics. The *Housing Land Availability Schedule* (EB018, page 3) clearly states that;

² The Inspector is referred to paragraphs 44 to 46 of the HBF comments upon the submission version of the plan.

³ DCLG 2017: Fixing our broken housing market

“Of the new build completions this year 57% were less than 30 dwellings per hectare, 27% were between 30 and 50 dwellings per hectare and 15% were greater than 50 dwellings per hectare.”

14. The policy would, therefore, appear at odds with the recent delivery evidence. Furthermore whilst the NPPF, paragraph 47, does indicate local authorities can set out their own approach to housing density this should be based upon local circumstances and not harm the overall objective of boosting significantly housing supply.
15. The requirement would also appear at odds with Policy GD7, criterion ‘a’ which requires: *“...densities of new residential development reflect and wherever possible enhance the local character of the surrounding area...”*. The HBF therefore recommends a more flexible approach be taken which considers site and locality characteristics.

Q11: Does the policy adequately address the needs of different groups in the community in accordance with the first two bullet points in paragraph 50 of the Framework?

16. The HBF address this issue within paragraphs 57 to 60 of our comments upon the submission version of the plan.

Q12: Should the policy include specific reference to the proportion of dwellings to be provided by size? Is this justified or could the data become out-of-date during the Plan period? Is it clear what proportions of dwelling size would be required in different locations?

17. No, the HBF would not support a prescriptive requirement upon the size of dwellings to be provided. The HBF recommend greater flexibility to take account of individual site characteristics, market demand at the time of the development and viability.
18. The SHMA (ED021) provides some information and context (figure 7.22) but indicates these are only estimates. This information is also based upon older versions of the housing need assessment and as such is already likely to be out of date. The information also takes no account of demand or aspiration.

Q13: The policy requires the delivery of at least 20% of homes on sites of 20 or more dwellings to be designed to accommodate the elderly. Is this justified and based on robust evidence?

19. The SHMA (ED021) and *Specialised Housing Background Paper* (ED029) provide clear evidence of an aging population within Fylde. It is, however, unclear how the 20% requirement has been derived. Many older residents may wish to stay within their 'family home' and seek adaptations to that home when / if required. The evidence does not provide any clear indication of those likely to move and as such the 20% requirement appears rather arbitrary. Given the impact of the requirement upon both viability and affordability a more robust assessment should be made.

Q14: Is the requirement for specialist accommodation to include compliance with the optional technical standard for wheelchair adaptable dwellings justified and based on robust evidence of identified need? Has the impact of applying these standards on viability of schemes been considered? (Also see Policy GD7)

20. The policy appears to imply that all new housing for older persons should comply with optional standard M4(3A), wheelchair adaptable dwellings. Whilst the growth in the older population is not disputed the need for 20% of all dwellings to be wheelchair adaptable is not adequately evidenced.

21. The *Specialised Housing Background Paper* (ED029, page 17) identifies a projected increase of 1,695 persons with at least one mobility issue over the plan period. It is unclear whether each individual with such a mobility issue would require a wheelchair adaptable dwelling. If every individual did require such a dwelling and where intending to move out of their 'family home', which appears unlikely, a maximum of 1,695 such dwellings would be required. This represents approximately 19% of the housing requirement⁴.

22. Given the fact other sources of accommodation will be available, including extra care facilities, and some will not wish to leave the 'family home' a 19% requirement appears too high. Given the impact upon viability and affordability this is not considered a sound approach.

23. The policy also appears to take a one-size fits all approach to delivery, requiring 20% on all sites above 10 dwellings. This completely ignores the Council's own evidence upon the appropriate location for such properties (ED029, page 21).

⁴ Based upon the suggested housing requirement within examination document EL5.003e.

24. In terms of viability it is noted that additional costs of £5,650 is applied to take account of the M4(3A) requirement (Paragraph 2.11, *Economic Viability Assessment addendum*, SD006). This is significantly below the costs identified within the study undertaken by EC Harris in September 2014⁵ on behalf of the Department for Communities and Local Government. This identifies that complying with M4(3A) as an extra over cost above a standard for an equivalent dwelling type excluding additional space costs to be in the range £7,607 to £10,568 (table 45). The viability implications are therefore likely to be greater than anticipated by the *Economic Viability Assessment*.

Q15: Evidence set out in supporting text to Policy H2 states that rural areas have significantly fewer 1 and 2 bedroom homes than other parts of the Borough. Therefore whilst H2 states that 50% of developments of 10 or more dwellings should be 1-3 bed, 33% of home in rural settlements should be 1-2 bed. What is the source of this?

25. The HBF consider this an issue for the Council to address.

Q16: Does the policy provide sufficient flexibility to react to market forces?

26. No, we refer the Inspector to our responses provided above.

Policy H4 - Affordable housing

Q17: It has been suggested that Policy H4 should be amended so that residential developments at the Fylde-Blackpool periphery should provide financial contributions for affordable housing to be spent in Blackpool. Has this approach been considered by the Council and is it reasonable?

27. The HBF consider this an issue for the Council to address. However, greater flexibility regarding the delivery of affordable housing would be welcomed.

Q18: Under tenure the policy refers to the provision of starter homes. Is this appropriate in light of the Housing White Paper?

28. The HBF consider that the provisions of the White Paper should be given due consideration. It should, however, be noted that the Council's viability study (SD006) is predicated on the delivery of 20% of the affordable housing requirement as starter homes (paragraph 3.5). A change to this will have significant implications for viability across the plan area.

⁵ EC Harris (2014) Housing Standards Review: Cost Impacts

Policy H5 – Gypsies, Travellers and Travelling Showpeople’s Sites

Q19:

29. The HBF has no comments.

Policies H6 and H7 – Homes in the Countryside

Q20: Do these policies apply to the countryside, Areas of Separation and the Green Belt? Is this clear within the policies?

30. Greater clarity and justification upon this issue would be welcomed.

Q21 and Q22:

31. The HBF has no further comments at this stage.

Yours sincerely,

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