

## Fylde Council Local Plan Examination

### Stage 2 Hearing Sessions

#### Matter 5: Housing Site Allocations and Delivery

Submission on behalf of Metacre Ltd

9<sup>th</sup> June 2017

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#### Introduction

1. This submission is made for and on behalf of Metacre Ltd with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (V1, 15th May 2017) and supplements the representations lodged with Fylde Council on the *Local Plan, 2032 Publication Stage* (August 2016).
2. It specifically concerns Matter 5 Housing – Site Allocations and Delivery.

#### Question 1

*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. In their response of 10<sup>th</sup> May 2017 Fylde have advised that they are now suggesting that the housing requirement for the Local Plan be increased to 415 dwellings per annum (dpa) and that the Local Plan is amended accordingly. Metacre still have concerns regarding the suggested objectively assessed housing need / housing requirement figure. Furthermore, and as set out in the Stage 1 Hearing submissions, Metacre have concerns regarding the approach Fylde are suggesting for catching up the housing shortfall, as well as the deliverability of sites. However, in light of the Inspector's response dated 17<sup>th</sup> May 2017 no comments are made on these matters at this stage.

## **Question 6**

*Is the methodology for site assessment and selection robust and justified?*

4. It is unclear what methodology has been used as the allocated sites appear to have been chosen primarily on the basis of which sites already have planning permission.

## **Question 7**

*Are the proposed housing site allocations in policies SL1-SL5 justified and deliverable? Are the delivery rates for the sites reasonable and achievable?*

5. Metacre have concerns regarding the deliverability and suggested delivery rates for a number of allocated sites. However, it is understood from the Inspector's letter of 17<sup>th</sup> May that consultation on the 5 year housing land supply and the housing trajectory will occur after stage 2. This response is therefore limited to sites allocated in policies SL1-SL5 which are either not considered justified / deliverable or are unlikely to deliver the amount of housing suggested over the full plan period. Metacre still have concerns regarding the suggested start date and delivery rate of other sites and allowances identified in the trajectory, which would have implications on the five year housing supply, but this is for discussion after the Stage 2 Hearings.

### HSS1 Queensway (policy SL1)

6. This is a major strategic site for 1,150 dwellings, of which the updated trajectory anticipates 870 will be delivered over the plan period (policy SL2 originally suggested 930). This delivery rate assumes there are two developers, with the first 30 houses being built in 2017/18 and 60 dpa thereafter. Whilst this site exceeds 300 dwellings housing developer Kensington Developments Ltd has secured reserved matters approval for phase 1 and have submitted reserved matters for the remainder of the development. This indicates one developer, not two. Consequently, the number of dwellings likely to be delivered from this site over the plan period is reduced by half to 434 (435 less than in the trajectory).

### HS2 Jubilee House, Lytham (policy SL1)

7. This site is allocated for 20 dwellings, however, it is currently a business park and some 14 months after securing outline residential consent planning permission

was sought and granted for the erection of a sign displaying the occupants of the offices (ref no. 14/0762). The residential consent (13/0001) also expired in August 2016. This suggests that the owner does not intend to seek the residential redevelopment of the site, raising questions about the realistic deliverability of this allocation.

HS6 North Promenade (policy SL1)

8. This site is allocated for 12 dwellings. Outline planning permission was originally granted in April 2013 (08/0853) and was then renewed in June 2014 (13/0744). There is no evidence on the Council's web site of Reserved Matters having been submitted and the latest outline permission expired on 9<sup>th</sup> June 2017. Moreover, these permissions require the demolition of 68 North Promenade and in June 2015 planning permission was granted for a single storey domestic extension to 68 North Promenade (15/0228). The Building Control record ref: R/BN/15/0413 also confirms that this extension has been completed. This suggests that the owner does not intend to seek the residential redevelopment of the site.

HS12 Fairways, St Annes (policy SL1)

9. This allocation is for 20 dwellings. However, Fylde DC Committee resolved to grant outline planning permission on this site, subject to a s.106 Agreement, over 9 years ago in 2008 (08/0092). The Council's web site indicates that there is still no completed s.106 and thus no planning permission. Development plans have to be realistic, particularly with regards to delivering the Borough's housing requirement. The fact that there has been no progress on this site in 9 years raises concerns about its realistic deliverability.

HS13 Kingsway Garage (policy SL1)

10. This allocation is for 30 dwellings. Fylde DC Committee resolved to grant outline planning permission on this site subject to a s.106 over 4 years ago in Oct 2012 (11/0667). The Council's web site indicates that there is still no completed s.106 and thus no planning permission. The fact that there has been no progress on this site since Oct 2012 raises concerns about its realistic deliverability.

MUS2 Whyndyke Farm (Policy SL2)

11. This is a major strategic site for 1,310 dwellings, 20ha of Class B2 / B8 uses, Primary School, two Local Neighbourhood Centres, Class A4 and D1 uses, together with open space and other infrastructure. Policy SL2 suggests that 810 houses will be delivered over the plan period, although Fylde's updated trajectory now suggests 750. This is based on the first 30 houses being completed in 2019/20 and the site being built out at 60 dwellings per annum (dpa) thereafter.
12. The annual delivery rate is not considered unreasonable on the basis that there is likely to be more than one developer. However, it is considered that the suggested start date is unrealistic and as a result the site is unlikely to deliver the suggested 750 houses over the Plan period. In this respect, whilst Fylde's Development Control Committee have resolved to grant outline planning permission, this has yet to be issued as the required s.106 Agreement is still being produced. The applicants are landowners, not developers, and the site will therefore require marketing as well as reserved matters applications to be submitted / approved. There are also a significant number of conditions which require discharging before development can commence. This is also a major strategic site requiring significant infrastructure, including an internal distributor road together with improvement schemes to the M55 junction and other off-site highway works. The proposed conditions on the Committee Report require some of this infrastructure to be implemented prior to the occupation of the first dwelling. It is therefore unlikely that this site will start to deliver housing as early as 2019/20, as suggested in the trajectory. Consequently the site is unlikely to deliver the suggested 750 houses over the Plan period.

HSS5 Cropper Road West, Whitehills (policy SL2)

13. The policy and updated trajectory identifies this site as delivering 442 dwellings over the plan period. This assumes a delivery rate applicable for two developers, i.e. 30 dpa in the first year followed by 60 dpa thereafter. Fylde's table in their 27<sup>th</sup> January response states that this site is owned by Wainhomes and that an application is expected shortly. If there is known to be only one developer then there is no justification for the higher delivery rate. If the housing trajectory were amended accordingly it would mean only 315 dwellings would be delivered over

the plan period (127 less than suggested in the trajectory). This is assuming the start date remains the same.

HS30 Pennine View, Wesham (policy SL4)

14. This site is allocated for 12 dwellings but has a history of unimplemented planning permissions such as 10/0307 which obtained a resolution to approve subject to a Section 106 Agreement which the applicant failed to sign. The latest application obtained outline planning approval in September 2013 (13/0364) which expired in September 2016. This suggests that there are constraints preventing this site being brought forward.

HS47 North View Farm, Wrea Green (policy SL5)

15. This site is allocated for 15 dwellings. Whilst an outline application for 15 dwellings (14/0880) and a full application for 11 dwellings (15/0296) were submitted over 2 years ago, according to the Council's web site both applications were withdrawn and there have been no resubmissions. This raises concerns regarding the realistic deliverability of this site.
16. It is noted that the Council's updated housing trajectory identifies a total of 8,793 dwellings coming forward within the Plan period, which includes completions, allocations, committed sites and a range of allowances. If the trajectory is amended to reflect the above, this supply falls by at least 676 dwellings before consideration is given to the realistic delivery from strategic allocation MUS2 and the various allowances. This means the Plan is over 600 dwellings short of meeting the Council's suggested new housing requirement of 8,715 dwellings identified in their response of 10<sup>th</sup> May 2017, which Metacre also consider to still be too low to meet the OAN.

**Question 8**

*In Policy SL5 no sites are listed for Elswick as these will be determined as part of the Neighbourhood Plan (NP). What is the timescale for the NP and is this approach justified?*

17. Whilst the Neighbourhood Plan area has been approved and a questionnaire to local residents circulated, it is understood that there has been no further progress.

Metacre do not object to the concept of the Local Plan referring to development potentially coming forward at Elswick, but it is not considered appropriate for this to be included within the five year housing supply. However, this is a matter for discussion after the stage 2 Hearings.