



## **Gladman Developments Ltd**

### **Fylde Local Plan EiP**

## **Matter 5 – Housing – Site Allocations and Delivery**

**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?**

**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?**

1. Upon reviewing the Council's latest 5-year housing land supply (5YHLS) assessment it is clear that the Council currently acknowledge that it is unable to demonstrate a 5YHLS against its newly revised housing requirement. This is a significant concern meaning that upon the point of adoption the Council is unable to demonstrate a robust and responsive housing land supply position.
2. To address this shortfall Gladman consider that the Sedgefield approach is the most appropriate methodology for calculating housing land supply. The Sedgefield approach closely aligns with the National Planning Policy Framework's approach to significantly boosting the supply of housing (paragraph 47), by attempting to deal with any historic shortfall within the first five years and over the shortest period possible. This approach is also directly endorsed by Planning Practice Guidance<sup>1</sup>, which states:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."

3. The Liverpool (or residual) approach, where shortfall is made up over the full length of the plan period has also been supported in some instances; but only where there is evidence that past delivery has been restricted by housing moratoria or other constraints, and this is also referred to in PPG referenced above.

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<sup>1</sup> PPG: 3-035-20140306

4. Whilst noting that at this stage the Council will continue to calculate the five year housing land supply based on the 'Sedgefield' approach, the 5YHLS paper dated May 2017 suggests the use of the Liverpool approach following the adoption of the Local Plan. Gladman would highlight that this approach does not appear to be consistent with the requirements of the Framework.
5. Whilst neither method is specifically mentioned in national planning policy, it is clear that the emphasis is on meeting housing needs in full on an annual basis and as a minimum. It seems at odds with that approach to spread past housing delivery failure over a longer period into the future when it should already have been delivered. It must be borne in mind that any further delay to meeting unmet housing needs is failing those households who need both market and affordable homes since the start of the plan period.
6. This is not simply a theoretical mathematical exercise as there are households who need homes now so it is unreasonable to expect them to wait until later in the plan period before their housing needs are addressed.

**2. 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?**

7. Gladman would support the inclusion of a housing trajectory graph as an appendix within the Local Plan. The inclusion of a housing trajectory graph will be important to consider future housing land supply assessments and how realistic the Council's assumptions on lapse rates/non-implementation allowance, lead in times and delivery rates are. Should monitoring identify a shortfall in the Council's housing land supply, as is currently the case, then this will enable the Council to consider its previous assumptions and undertake corrective action where necessary.

**7. Are the proposed housing site allocations in Policies SL1 – SL5 justified and deliverable? Are the delivery rates for the sites reasonable and achievable?**

8. Although Gladman do not wish to comment on the merits of individual sites contained within the Council's housing land supply, it is critical that the Council's assumptions on housing delivery are correct and reflect realistic assumptions on each site's deliverability.
9. It is noted that the latest 5HLS continues to utilise a standardised approach to housing delivery with 15 dwellings being built in the first year and 30 dwellings thereafter. Whilst there is some merit in such an approach, the Local Plan has now reached an advance stage where more up-to-date information may be available to the Council from those currently promoting sites for sites delivering in the next 5-year period.

10. Furthermore, we are also concerned with the rationale behind the delivery rates applied to sites in excess of 300 dwellings, this in effect doubles the delivery rates to 60 dwellings per annum. As previously highlighted, the ability of such sites to deliver at this level is dependent on the number of outlets acting on site. However, no information has been provided on how many developers are acting on site and therefore this brings into question whether the methodology behind this approach is realistic and whether the sites will deliver at the expected rates.

### **Policy H1**

#### **9. 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. Whilst this question is directed towards the Council, Gladman are concerned that the provisions of this policy are insufficiently detailed and do not provide certainty that corrective action will be taken in order to maintain a 5YHLS, should it become apparent through monitoring that a shortfall in housing provision is occurring (as is currently the case).
12. Gladman believe that this policy should be modified in order to ensure that any shortfall in housing land supply that is observed over the plan period is addressed as quickly as possible and suitable mechanisms are therefore needed to be built into the Local Plan.
13. At present, this policy merely seeks to resolve any shortfall if housing delivery targets have not been met over 3 consecutive years. This is not an effective response as it will mean that any housing shortfall will continue to worsen without an effective response for a period of three years.
14. Further, it is unclear how the delivery of uncommitted sites will be adjusted when this is outside of the Council's control, or what this process will involve in practice.
15. In order to ensure that any shortfall in housing land supply that is observed over the plan period is addressed as quickly as possible, suitable mechanisms should be built into the Local Plan. The recently published Local Plan Experts Group (LPEG) report recommends that "the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF"<sup>2</sup>.

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<sup>2</sup> Local Plan Expert Group Report – Paragraph 11.4

16. Accordingly, Gladman suggest that it would be appropriate to include a contingency in the Local Plan's housing supply to provide greater certainty from the outset that housing will be delivered as expected. This approach will add greater flexibility and certainty that housing will be delivered over the duration of the plan period, and will also align itself with the aspirations of the Government's recent Housing White Paper to support small and medium sized house builders as major contributors to the house building industry.
17. Gladman note Main Modification 25A to the North Northamptonshire Joint Core Strategy<sup>3</sup> which stated that 'In order to provide an early-warning if supply of housing land is running short relative to NPPF requirements, monitoring will be undertaken against the Policy 28 requirement plus an additional 25% buffer. If not available, this would trigger corrective action by the local planning authority in order to boost supply.'
18. Further, under the Housing White Paper, a Housing Delivery Test is proposed. Based on the evidence of past rates of completions in the borough, it is likely that the Council would fail the proposed test. As such, further site allocations and a more flexible approach to development adjacent to existing settlements will likely be needed to provide flexibility and contingency, and ensure that the Council's full OAN will be delivered.
19. Gladman consider that the inclusion of additional policy wording that provides flexibility in responding to a failure in the five-year housing land supply would therefore be appropriate. Such an approach was also taken at the recent Scarborough Local Plan<sup>4</sup> where the following wording was agreed by the Inspector:

"Policy HC1

New opportunities for housing development will be encouraged across the Local Plan Area by:

- a. Making provision, during the Local Plan period, for the delivery of a minimum of 9,450 net additional dwellings through allocations identified under Policy HC2; New Housing Delivery and existing commitments as shown on the Policies Map; and
- b. Supporting the development of new housing within settlements where proposals are compatible with other policies in the local plan.

**At any point in the Local plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites that would both make a positive contribution to the five year supply of housing land and be well related to the development limits of settlements of at least the Service**

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<sup>3</sup> <http://www.njpu.org.uk/docs/JCS%20App%201%20Main%20Mods%20Final%202022-06-16.pdf>

<sup>4</sup> Scarborough Local Plan Appendix to Inspector's Report 9<sup>th</sup> February 2017 – Main modifications

**Village classification as defined in Policy SH1 will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the Local Plan.**

**Proposals that come forward under this mechanism will not be required to comply with Policy ENV6 but must be of a scale that both respects the physical size of the settlement it relates to and its position within the Settlement Hierarchy, as set out in Policy SH1.”**