



HALLAM LAND MANAGEMENT LTD

FYLDE COUNCIL LOCAL PLAN

EXAMINATION HEARING STATEMENT

HOUSING – SITE ALLOCATIONS AND DELIVERY (MATTER 5)

ISSUE 9

Date: June 2017

Pegasus Ref: GL/MAN.0145/R014v4

Your Refs: Representor No. 19

Pegasus Group

Suite 4b | 113 Portland Street | Manchester | M1 6DW

T 0161 393 3399 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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1. MATTER 5 – HOUSING – SITE ALLOCATIONS AND DELIVERY

- 1.1 The following statement is made on behalf of Hallam Land Management and should be read alongside Stage 1 Hearing Statements on Matters 2 (Ref: R011v2) and 3 (Ref: R012v2) from March 2017; as well as our representations to the Publication Local Plan in September 2016 (Ref: R009v2).
- 1.2 We would like to support this statement by attending the first day of Hearing Sessions on Matter 5, and potentially the second day if required.

1.3 We would also highlight at the outset that our response to question 7, in respect of allocations within the Warton Strategic for Development forms the key part of this representation and is the main issue we wish to discuss at the Hearings (relevant text boxed as it is here).

- 1.4 Furthermore, we would like to request that the Council provide a consolidated version of the Local Plan with the latest proposed modifications all in one document, with tracked changes or the proposed modifications highlighted (which is common in other Local Plan processes we have been involved in recently, with the example of West Oxfordshire provided below¹), as this will make the plan far more legible to readers.
- 1.5 It would be useful to have this in advance of the Stage 2 Hearings, however we appreciate this may not be practical. Failing that we note the Inspector's suggestion, in the Stage 2 Examination Guidance Note (EL5.005c), that there will be further consultation on main modifications and the Council's updated evidence on OAHN and changes to the development strategy, and so would respectfully request that a consolidated document is provided at this stage.

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

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 on the shortfall and the buffer to be applied?

- 1.6 The main plan document does not set out the 5-year supply position clearly, instead it makes sporadic references to the individual elements of the supply calculation across paragraphs 10.1 to 10.19. As such further clarity would be welcomed on this and it may be useful to add a summary table of the different steps.
- 1.7 That said, the Council have set out their 5-year supply methodology clearly in their Five Year Housing Supply Position Statement, with a base date of 31st March 2017, with the full calculations set out at Page 4, and this consistent with earlier versions of this document. Within this they accept that the 20% buffer is required and that this should be added to the 5 year requirement and shortfall combined, an approach which we fully agree with as it aligns with paragraph 3-035-20140306 of the NPPG and the PAS guidance.

¹ <http://www.westoxon.gov.uk/media/1572550/CD5-Local-Plan-including-Proposed-Modifications.pdf>

- 1.8 This 5YHLS Position Statement is based on the Council's revised housing requirement of 415 dpa, which was adopted at Planning Committee on 8th May following publication of updated evidenced on objectively assessed need (EL5.003f).
- 1.9 Overall, this confirms that Fylde actually have a 4.8-year supply at 31st March 2017, and therefore are still unable to demonstrate a 5 year supply.
- 1.10 We are conscious that the Inspector does not propose to discuss OAN matters at the Stage 2 Hearings (as set out in the Guidance Note EL5.005c); and also suggests that there is no need to discuss omission sites; however given that the Council are still unable to demonstrate a 5 year supply then surely further allocations (i.e. omission sites) will need to be considered and discussed at this stage, and we address this in more detail in questions 6 and 7 below.

Question 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, it is necessary to include site specific details given it may quickly become out of date? Should a housing trajectory graph be included in the Plan?

- 1.11 We agree that trajectory should be included in the Plan, to provide clarity and justification for the proposed housing requirement and distribution across the plan period, by demonstrating that the plan has a five-year supply upon adoption, and as a yardstick to measure delivery rates against as the plan progresses.
- 1.12 We also agree with its inclusion as an appendix rather than in the main text, where it becomes more of an informative, and less problematic when it does become out of date, which is inevitable.
- 1.13 That said, it is our view the latest Housing Trajectory (dated 31st March 2017) will not deliver a five year supply upon adoption, as confirmed by the latest 5YHLS Position Statement, which puts the Council at 4.8 years once a 10% deduction is included for under-delivery, nor will it meet the full housing needs of the borough across the plan period (as we set out in Question 7 below); therefore we suggest the trajectory is updated to address these issues.

Site Allocations: Policies SL1-SL5

Question 3: In light of further planning permissions that have been brought to my attention, do these policies need updating with new sites.

- 1.14 Yes, given the Council's chosen approach of providing detailed requirements and proportions for each of the strategic and non-strategic locations for development (under policies SL1 to SL5), they need to be updated with the latest planning permissions to ensure that the plan is robust and up to date.

Question 5: The policies refer to masterplans and design codes for each site without planning permission in the case of Policies SL1 and SL2 and specific strategic sites without planning permission for Policies SL3 and SL4. Are these justified and consistent with Policy M1?

- 1.15 There is clear inconsistency between these two policies, as Policy M1 suggests that masterplans and design codes (to be enshrined in SPDs), will be required for all allocations within the Strategic

Locations for development whilst policies SL1-SL4 only require it for those sites that don't have planning permission.

- 1.16 In our view the approach taken in Policies SL1-SL4 is more appropriate and justified, as the imposition of an additional masterplan, design code and SPD process on sites that already have consent (as suggested by Policy M1) is onerous and adds an additional layer of complexity, which will inevitably lead to delays in implementation, and we address this in more detail in our Matter 6 statement (in relation to Question 25).
- 1.17 It is also arguable that the masterplan criteria required under policy M1 could be achieved through the detailed development management policies set out elsewhere in the document (most notably those in chapters 8, 11, 13 and 14), so it is questionable if this policy is necessary at all, even for sites without permission, and therefore whether it needs to be referenced in policies SL1-SL4, and we would ask that the Council clarify this point.

Question 6: Is the methodology for site assessment and selection robust and justified?

- 1.18 The main plan document does not address the site assessment and selection methodology at all and this position should be clarified in the supporting text.
- 1.19 That said, both the Revised Preferred Option (Regulation 18) and Publication (Regulation 19) Plans were supported by Site Assessment Background Papers (ED003 & ED004, dated October 2015, and May 2016 respectively; albeit both had a 31st March 2015 base date). These provide some justification for the site selection process and consideration of alternatives, albeit the actual assessment of the sites is fairly cursory so it is arguable whether this is robust.
- 1.20 A more detailed Strategic Site Assessment (ED028 a-g, base date December 2015) has also been undertaken which assesses 31 strategic sites against 37 different comparable indicators (covering social, environmental and economic matters in line with the NPPF) and this is considered a more robust and justified approach. It should be noted that this does not include any judgment on the scoring of individual sites, although we do address this point in the next question.
- 1.21 However, it should also be noted that the strategic site selection process has been largely driven by planning permissions granted during the period of plan preparation, where there has been a consistent absence of a 5-year supply; and these include several that were approved at S78 Appeals after being refused or not determined by the Council, including:
- Queensway, St Annes (Site Ref: HSS1) – 1,150 dwellings;
 - Blackfield End Farm (HSS2) – 360 dwellings;
 - Land North of Freckleton Bypass, Warton (HSS12) – 350 dwellings (*the Council have included this in the trajectory as 375 which is an error*);
 - Clifton House Farm, Warton (HSS13) – 115 dwellings;

- Pastures, Fleetwood Road Wesham (HSS8) – 100 units (*although the Council have since granted consent for 264 units across an enlarged site*).
- Land north of Blackpool Road, Kirkham (HSS9) – 297 dwellings; and
- Land at Brook Farm, Dowbridge (HS57) – 170 dwellings.

1.22 Whilst we do not challenge the suitability or sustainability of any of these sites, this demonstrates that the site selection process has been largely out of the Council's hands; with at least 2,542 of the 7,827 units (32.4%) to be allocated in the four strategic locations for development being determined by Planning Inspectors and the Secretary of State. As such the process has been more reactionary which does undermine its robustness somewhat; however this is a common issue in local plan processes across the country, with planning applications progressing independently of local plan preparation.

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?

1.23 Unfortunately, we have not had scope to undertake a full review delivery rates on all the sites within Policies SL1 and SL5; therefore we cannot fully comment, other than to make cross reference to the 5 year supply position that was agreed in relation the Clifton House Farm, Warton inquiry through the Statement of Common ground attached at Appendix 5 of our representations to the Publication Local Plan; which was based on delivery evidence put forward in our Planning Proof submitted to that Inquiry in June 2016 (Ref: ST/MAN.0145/R006v6, paragraphs 10.20-10.40, as attached at **Appendix 1**).

Reduced delivery rates

1.24 This analysis suggested reduced delivery rates at: Queensway, St Annes (HSS1); Coastal Dunes (HSS4); Cropper Road East (MUS1); and Blackpool Road, Kirkham (HSS9). Overall it concluded that delivery rates for the next 5 years should be reduced by 400 units, which took the deliverable supply down from 3,052 down to 2,647 (once a 10% slippage rate had been applied).

1.25 We accept those figures will now be out of date, therefore we would also refer to more recent delivery rate evidence submitted to the Stage 1 Examination Hearings in March 2017, by Lichfields on behalf of Taylor Wimpey (EL2.011c(ii)). This suggested reduced delivery rates and longer lead-in times at:

- Queensway, St Annes (HSS1) – reduction of 75 dwellings from 'commitments' over 5 years;
- Coastal Dunes (HSS4) – reduction of 64 dwellings from 'commitments';
- Cropper Road West (HSS5) - reduction of 60 dwellings from 'commitments';
- Cropper Road East (MUS1) – reduction of 5 dwellings from 'commitments'; and 5 from 'allocations'
- Whyndyke Farm (MUS2) – reduction of 60 dwellings from 'minded to approve';

- Westgate Road, Squires Gate (HS21) – reduction of 30 dwellings from ‘commitments’;
- Blackfield End Farm (HSS2) – reduction of 23 dwellings from ‘commitments’;
- Oaklands Caravan Park, Warton (HS27) - reduction of 53 dwellings from ‘minded to approve’;
- Willow Drive, Wrea Green (HSS11) - reduction of 14 dwellings from ‘commitments’; and
- Elswick Neighbourhood Plan Allocation - reduction of 50 dwellings from ‘allocations’.

1.26 Lichfields combined these deductions with other adjustments in the table below which concluded that deliverable 5-year supply should be reduced by 498 dwellings from 3,471 to 2,973.

Extract from Lichfields Stage 1 Hearing Evidence

Table 4.2 5-Year Housing Supply

Components of Supply (2017-2022)	FBC	Lichfields	Difference
Allocations without planning permission	488	363	-125
Sites on which the Council is minded to approve permission	636	523	-113
Sites with Planning Permission	1,961	1765	-196
Allowances	386	386	0
Allowance for small sites (<50 dwellings) not coming forward	n/a	-64	-64
Total	3,471	2973	-498

Source: FBC and Lichfields

1.27 This evidence is based on recent correspondence with the relevant developers and agents so we have no reason to dispute the findings and suggest that these are realistic and achievable and that the Council’s rates should be adjusted to reflect these (as they have not been incorporated in the Council’s March 2017 trajectory).

1.28 We can also provide additional clarification on the Blackfield End Farm development (HSS2) which is within our client’s ownership, by confirming that a developer is now in place and therefore a start on site by late 2017 and delivery from June 2018 onwards will be achievable, as suggested by Lichfields.

Implications for 5 year supply

1.29 In terms of the impact on the five-year supply position, the Council have already confirmed that their latest trajectory will not deliver a five year supply based on their updated housing requirement of 415 dpa; however reducing their supply figure by 498 units reduces their 5 year supply figure from 4.8 years to 4.18 years.

Implications for total housing supply

- 1.30 In terms of the impacts on delivery and supply across the whole plan period, there are only sites that will realistically run beyond 2032:
- Queensway (HSS1) - 1,150 dwellings - with the Council's trajectory suggesting delivery of 870 by 2032 (with 280 beyond);
 - Whyndyke Farm (MUS2) - 1,310 dwellings - with the Council's trajectory suggesting delivery of 750 by 2032 (with 560 beyond);
- 1.31 Applying Lichfield's delivery rates would reduce Queensway's overall delivery by 75 (so 795 by 2032 with 355 beyond); and Whyndyke Farm by between 60 and 160; depending on whether a 50 or 60 dpa delivery rate is applied from 2022/2023 onwards.
- 1.32 This reduces the overall claimed supply (8,793) by between 135 and 235, generating a total supply of between 8,558 and 8,658 which would not meet the basic plan requirement of 8,715 (415 dpa spread over 21 years).
- 1.33 It is also pertinent that even without these deductions, the Council's supply would only exceed the requirement by 78 units or 1%, providing very little flexibility or a buffer for non-delivery.
- 1.34 A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. Such an approach is recommended within the LPEG report to Government (dated March 2016), with recommendation 40 (at Appendix A) noting that Local Plans should:
- "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. Reserve Sites represent land that can be brought forward to respond to changes in circumstances."*
- 1.35 Adding the recommended 20% buffer to Fylde's net requirement of 8,715 would require sites capable of delivering a total of 10,458 dwellings; up to 1,900 more than currently planned for.
- 1.36 Such a buffer of sites is particularly relevant in Fylde, given that the neighbouring authority of Wyre have significant unmet need issues, which Fylde are going to have to accommodate all or at least the majority of (as the other authority in the HMA, Blackpool, is heavily constrained by the sea and a relatively tight administrative boundary).
- 1.37 Wyre have not yet confirmed or justified the level of unmet need, which has allowed the Fylde plan to progress without addressing this matter; however Reserve Sites would offer the perfect mechanism to provide for this need as the plan progresses.
- 1.38 Therefore it is clear that the proposed housing allocations will not meet Fylde's needs to 2032, and, as such, the Council should consider allocating additional land for up to 1,900 dwellings to provide sufficient headroom for the proposed 415 dpa requirement to be delivered and for Wyre's unmet need to be met.

Further Allocations in Warton Strategic Location for Development

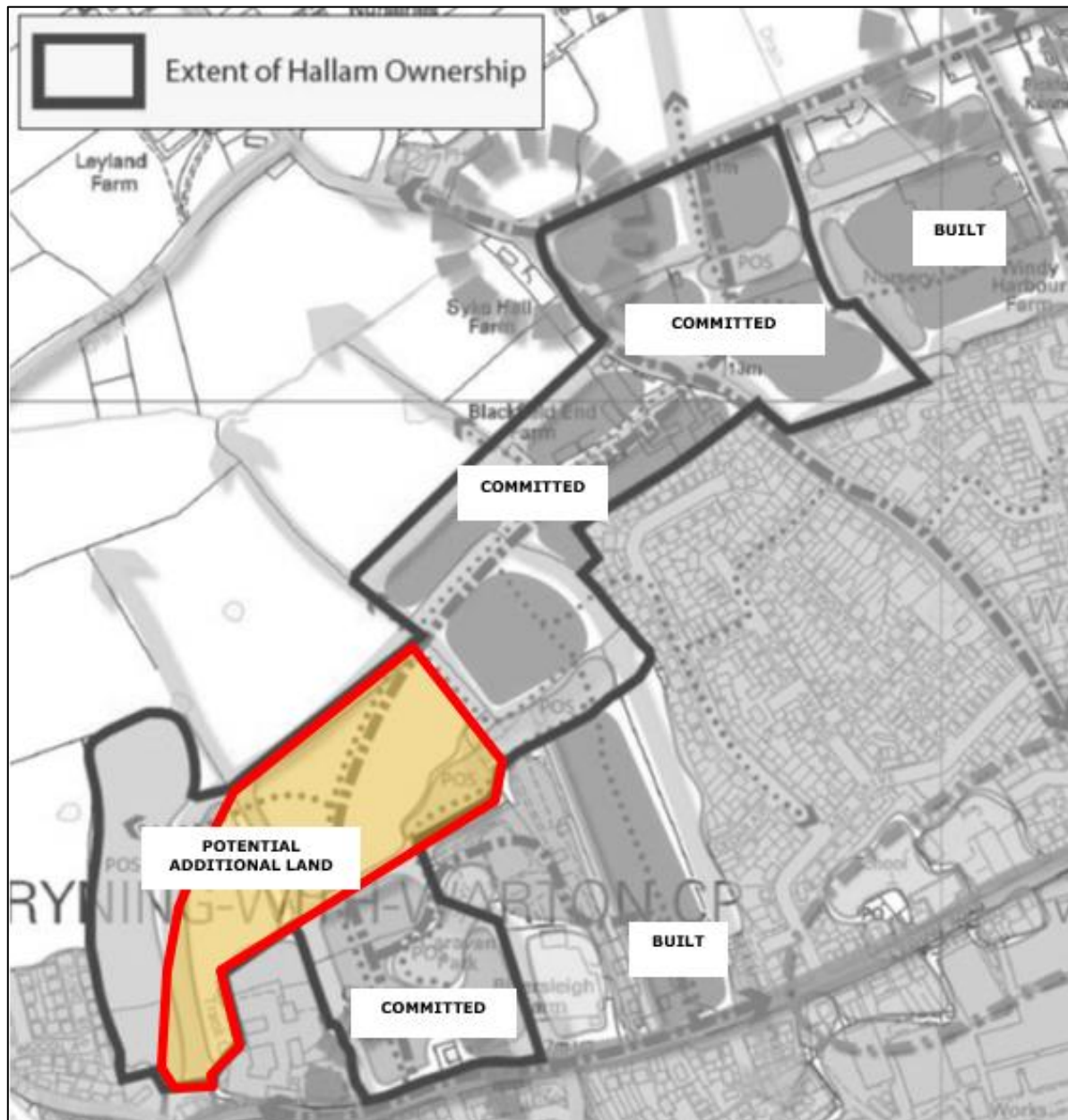
- 1.39 The previous sections have demonstrated that the Council may need to make additional allocations for up to 1,900 dwellings above those currently identified. We do not have any comments on additional sites within Strategic Locations 1, 3 and 4; but do have some thoughts on further allocations with the Warton Strategic Location for Development (under Policy SL3).
- 1.40 Warton has been proposed as a Strategic Location for Development throughout the emerging Local Plan process due to presence of the Enterprise Zone and BAE Systems complex, combined with a relative lack of physical constraints.
- 1.41 Accordingly, Policy SL3 proposes 8 allocations within Warton in a range of sizes (from 16 units up to 360), all of which now have planning permission and the majority of which are under construction or have a developer attached, as set out below:

Policy SL3: Proposed Allocations in Warton

Site Ref	Site Name	No of homes	Current Status
HSS2	Blackfield End Farm	360	Developer committed, start on site expected late 2017, delivery mid-2018.
HSS7	Highgate Park	254	Barratts are on site with 64 units already completed.
HS24	Riversleigh Farm	82	Prospect Homes are on site with 61 units already completed.
HS25	Nine Acres Nursery/ Meadows View	75	Taylor Wimpey have developed main estate (66 units) with further 9 units under construction.
HS26	George's Garage	16	Site under construction or due to be developed imminently.
HS27	Oaklands Caravan Park	53	As noted in Lichfields analysis, this is likely to continue as a Caravan Park.
HSS12	Land North of Freckleton Bypass	375 (350)	Gained Secretary of State consent in February 2017, numbers reduced to 350. It is understood that no developer is yet attached
HSS13	Clifton House Farm	115	Gained Secretary of State consent in February 2017. Marketing underway, but no developer attached.
		1,330 (1,305)	

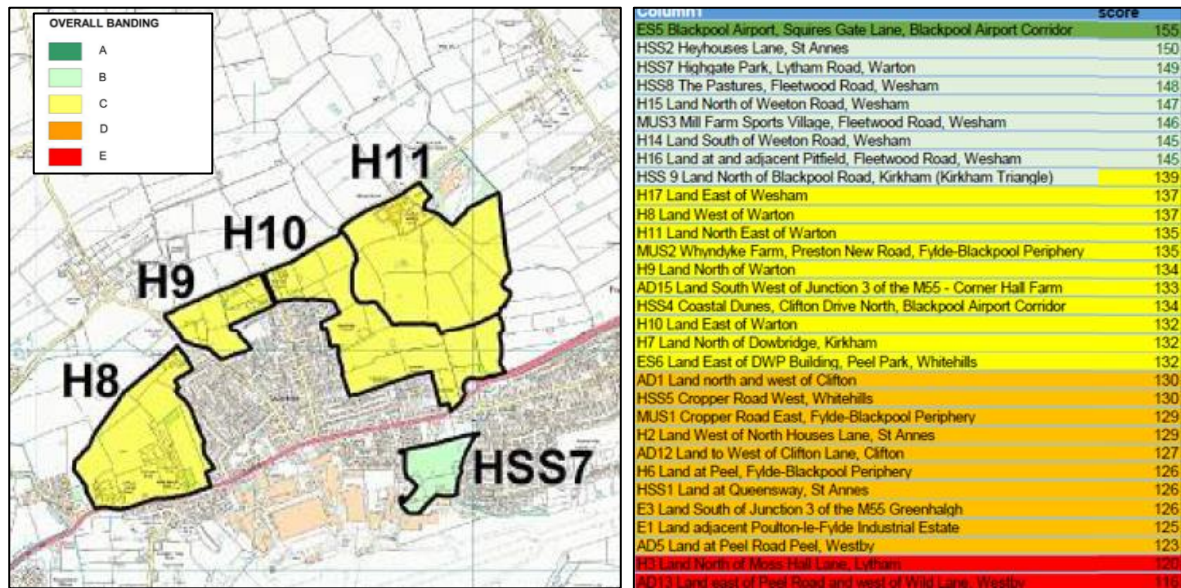
- 1.42 Therefore, over 1,300 units have been consented in Warton, and approximately 60% (787 units) are under construction or have a developer attached. This demonstrates that Warton is a strong market location that is delivering housing across a range of sites, and as such it is considered a suitable location to allocate further land.
- 1.43 As part of our representations to the Publication Local Plan in September 2016, and Stage 1 Hearing Statements from March 2017; we noted that there was additional land to the west of Warton that has development 'potential' and falls within our client's ownership (as shown on the plan below). This land totals 5.9 Ha outside of the Green Belt.

Additional HLM land west of Warton



- 1.44 Notably, this land was assessed under Strategic Site H8 in the original Preferred Options Local Plan, and was assessed as part of the 2013 SA relevant at the time. It was deemed to be a suitable, available and deliverable site for housing development.
- 1.45 Strategic Site H8 was also assessed more thoroughly within the Strategic Site Assessment (ED028 a-g), in December 2015. Within this assessment it achieved a score of 137, which ranked equal 10th out the 31 sites assessed, and joint second for sites in Warton, behind the Highgate Park site, which is a brownfield former employment site, and joint with site H11 to the north east of Warton, which has not been allocated or promoted for development. The overall assessment table and associated map from ED028b is attached at **Appendix 2** and extracts are also provided below for ease of reference.

Summary Extracts from Strategic Site Assessment, December 2015



- 1.46 This clearly demonstrates that Site H8, which has only been part allocated for residential development, is considered more sustainable than 10 other sites that have been allocated for residential development (8 in full and 2 in part), and 9 of these already have planning permission.
- 1.47 Therefore, it seems highly unusual that this additional 5.9 hectares in H8 has not been proposed for allocated as it is available and has been actively promoted through the Local plan process, and even incorporated into a wider masterplan for Warton (attached at **Appendix 3**), with a coordinated approach to transport connectivity and green infrastructure in line with the Council’s aspirations in Policy M1.
- 1.48 This raises further doubts as to whether the site selection process has been robust as discussed in question 6.
- 1.49 That said, in light of the evidence base, it be a relatively straightforward exercise to append this assessment to the current Sustainability Appraisal and provide an appropriate update without causing undue delay to the production of the Local Plan.
- 1.50 We anticipate this additional 5.9 hectares could accommodate approximately 175 dwellings (based on a density of 30 dph) over and above what has already been consented in Warton (although it may be possible to increase capacity if required to meet increased needs). The land would be accessed through the recent permitted development (Ref: 15/0562) for 115 homes at Clifton House Farm, and we would expect delivery could begin towards the end of the 6-10 year period once the strategic road improvements in the centre of Warton have been implemented, which are secured through permitted developments which are the subject of current Reserved Matters Applications.
- 1.51 As such, this site is considered wholly developable in a strategic location that is already delivering homes, through Barratts at Highgate Park (HSS7) and Prospect Homes at Riversleigh Farm (HS24),

and with a developer now committed at Blackfield End Farm (HSS2). It can provide further benefits to Warton offering the ability to link Lytham Road and Church Road; and can therefore be seen as the final piece in the jigsaw for delivering masterplanned and coordinated growth for Warton.

Conclusions on Delivery Rates and Further Allocations

- 1.52 In summary, the Council's latest trajectory confirms that they do not have a 5 year supply when compared against their emerging requirement, nor do they have a sufficient buffer of reserve sites to deliver the overall housing target over the plan period (as this currently stands at 1% compare to the 20% recommended in the LPEG guidance). A more detailed analysis of delivery rates on individual sites reduces this supply further and suggests they may need to allocate land for a further 1,900 dwellings to provide sufficient flexibility to account for under delivery and potential unmet needs of surrounding authorities.
- 1.53 This section has demonstrated that the additional land at Clifton House Farm, adjoining the committed developments at Clifton House Farm and Blackfield End Farm, is developable and sustainable (as confirmed by the Council's own evidence base), and could deliver at least 175 of these additional dwellings within the plan period with minimal impacts and substantial highways benefits, by providing a link road across the west of Warton.

Policy H1

Question 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?

- 1.54 It is not clear what mechanism the Council will use to adjust delivery on uncommitted sites if completion targets are missed, as this could comprise an allocations process, release of reserve sites or partial review of the plan. Nor is it clear whether these completion targets will be based on the housing trajectory or annual requirement. Furthermore, the 20% under-delivery threshold is much less stringent than the 5% (95% delivery) advocated by the Housing White Paper from November 2017, which will require local authorities to produce an action.
- 1.55 This suggests that this policy is neither justified nor effective as drafted and the Council should revisit this in light of the White Paper.

Policy H2 – Density and mix of new residential development

Question 10: A minimum density of 30 dph is proposed under Policy H2. Is this justified across all development sites, whether small or large?

- 1.56 We do not consider this to be justified, as although paragraph 47 of the NPPF allows local authorities to set their own approach to housing density, this should be based on local circumstances; yet the blanket density target proposed here does not provide sufficient flexibility for individual developments to respond to site characteristics and market conditions, and could undermine delivery as a result. This approach also conflicts with part (a) of policy GD7 which requires that

"...densities of new residential development reflect and wherever possible enhance the local character of the surrounding area..."

- 1.57 Furthermore, this is not justified by the latest evidence, as page 3 of the Council's own Housing Land Availability Schedule 2016 (ED018) states that 57% of completions that year were at a density of less than 30 dph.
- 1.58 As such we would reiterate our previous representations and suggest the policy includes an element of flexibility to allow lower densities in some cases; potentially by adding the word 'normally', as per the wording in previous 2015 Revised Preferred Options version, or by removing the minimum figure entirely and aligning it with part (a) of Policy GD7.
- 1.59 We also highlight from our earlier representations how lower density 'executive style' housing may help to attract and retain employers and employees in certain areas such as Warton, where the success of the BAE Systems complex and Enterprise Zone will be at least partly reliant on their ability to attract high proportions of skilled 'executive' staff.

Question 11: 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?

- 1.60 In respect of mix, we welcome the Council's acknowledgement that this will be adjusted in line with updated SHMAs over the plan period as this aligns with the first bullet point of paragraph 50 in terms of planning for the future; and having a separate mix requirement for rural areas goes some way to meeting bullet point 2, in terms of acknowledging different needs in different locations.
- 1.61 However, as with the density policy, we recommend that some flexibility is built in to the mix requirement, to allow individual developments to respond to site characteristics and market conditions, which will again be relevant in Warton, in terms of the provision of executive housing for skilled workers. Furthermore, using low levels of existing 1 and 2 bed provision in rural areas to justify an increased future requirement (as per paragraph 10.37) is a risk, as it may not align with future demand and lead to issues with delivery.
- 1.62 The provision of specialist accommodation for the elderly aligns with the bullet points in paragraph 50; however we make more detailed comments on the proportions and detailed requirements below in questions 13 and 14.

Question 12: 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?

- 1.63 We do not think a prescriptive requirement for dwelling size is appropriate as it would not deliver the flexibility required by national guidance to take account of individual site characteristics, viability and changing market demand over time.

1.64 That said, we do support the inclusion of tables 5 and 6 which provide data from the 2011 census and SHMA on existing dwelling sizes and estimated requirements as this is useful informative for the current position; although this will inevitably become out of date as the plan progresses, nor does it take account of demand or aspiration.

Question 13: 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?

1.65 HLM fully support the provision of housing for older people and accept that there is a clear need for such housing in Fylde, as confirmed in the Specialised Housing Background Paper dated May 2016 (ED029)

1.66 That said, it is unclear where the 20% requirement has been derived from; as whilst the estimates future increases in the elderly population, it does not give any indication of how many of those will require new purpose built accommodation; as in reality, many older people will wish to stay within their existing 'family home' and adapt it over time as required.

1.67 Therefore, the evidence does not provide a clear indication of those likely to move and as such the 20% requirement seems arbitrary, and potentially onerous given the impact it will have on the viability and affordability of schemes going forward.

1.68 As such we would argue that this target is not justified and that a more robust assessment should be undertaken.

Question 14: 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).

1.69 The policy as worded suggests that all new housing for older persons should comply with optional standard M4(3A), wheelchair 'adaptable' dwellings; however we do not think this is justified or evidenced.

1.70 As with the evidence for the overall requirement, having future estimates of mobility issues amongst the elderly does not confirm how many of those will require a new wheelchair adaptable dwelling, as many will prefer to adapt their existing home; whilst others will choose to move to dedicated and specialised extra care facilities.

1.71 This evidence does not properly address the adaptability of existing stock, or the needs across different tenures as required by NPPG para 56-007-20150327.

1.72 As such this requirement also seems arbitrary, and particularly onerous, as this technical standard will have a significant impact on the viability and affordability. The fact that it only applies to schemes above 10 dwellings may also prevent such housing being delivered where it is needed (i.e. the locations suggested in page 21 to 22 of ED029).

1.73 In terms of viability, we note the HBF's comments, which confirm that the Council's Viability Assessment (SD006, Paragraph 2.11) applies an additional cost of £5,650 per dwelling to take account of the M4(3A) requirement; whereas a study undertaken by EC Harris in September 2014 on behalf of the Department for Communities and Local Government suggested additional costs of between £7,607 and £10,568 (Table 45).

1.74 As such the viability implications of this policy are likely to have been underestimated so we suggest this evidence is revisited and updated in line with our comments above.

Question 15: 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?

1.75 We note our comments on this in question 11 above, and suggest that the Council provide clarification on this.

Question 16: Does the policy provide sufficient flexibility to react to market forces?

1.76 The policy does not provide sufficient flexibility, as explained in our comments on questions 10 – 15 above.

Policy H4 – Affordable Housing

Question 18: Under tenure the policy refers to the provision of starter homes. Is this appropriate in light of the Housing White Paper?

1.77 The Housing White Paper has clearly shifted away from a mandatory requirement for starter homes towards a more flexible approach with starter homes as part of a mixed package of affordable housing.

1.78 However the Fylde Plan and its supporting Viability Assessment (SD006) has been predicated on the basis of 20% of the affordable being delivered as Starter Homes, with 10% rented (paragraph 3.5); and therefore any change to this now will have major implications on viability and delivery of the plan as a whole, so this will need careful consideration, and any change would need to be tested through an updated Viability Assessment.