

Fylde Local Plan Examination

Matter 2

Objectively assessed housing and economic development needs Hearing Statement

On behalf of Oyston Estates

1.0 INTRODUCTION

- 1.1 Cassidy + Ashton are retained by Oyston Estates [OE] in respect to a number of sites within Fylde Borough including Whyndyke Garden Village, the largest development site within the Borough.
- 1.2 In respect to the Local Plan, OE are promoting the allocation of additional land at Lytham St Annes, the identified most sustainable settlement within the Borough.
- 1.3 Comments made should be read in conjunction with our previous submissions to the Local Plan process, in particular in respect to the Submission Version of the Local Plan.
- 1.4 The format of this statement follows the Inspector's own Matters Issues and Questions dated 6th February 2017.

Issue 3 - Is the identified objectively assessed housing need (OAHN) soundly based and supported by robust and credible evidence and is it consistent with national policy?

Question 11.

Does the identified Fylde Coast HMA provide a robust and appropriate basis for assessing housing needs?

- 1.5 OE considers that the Fylde Coast HMA provides an appropriate basis for assessing housing needs.

Question 12. The SHMA and its Addendums identify the OAN figure for Fylde as a range, based on the 2012-based sub-national household projections (SNHP). The DCLG released its 2014-based SNHP in July 2016. The Council refers to there being only a 1% difference in projected household numbers between the 2012 and 2014-based projections, though this is over slightly different timescales. Further to my initial questions to the Council (EL1.001a), its response (EL1.001b) indicates that the actual increase is less than 1% taking account of the different periods and it is not considered that this has any significant implications for the OAHN. Is this justified by the evidence? Is the use of the 2012-based sub-national household projections as a 'starting point' for identifying the OAHN appropriate? What bearing, if any, would the latest household projections have on the assessment of the OAHN?

- 1.6 Given the availability of the 2014 based sub-national household projections, it is clear that these should be utilised as a basis for calculating future housing needs to be addressed through the Fylde Local Plan. Indeed, this is the approach ordained in national planning guidance in the form of the PPG (ID 2a-016) which clearly states that the most up to date projections should be used where they are available.
- 1.7 Inevitably, this will have an impact upon the identified housing need but will ensure the plan is robust and not subject to potential challenge.

Question 13.

Is the OAHN range of figures identified in the SHMA soundly based?

- 1.8 As with the previous statement, the 2014 based projections should be utilised as a base which will result in the housing need for Fylde Borough being set towards the higher end of the range identified.

Question 14.

Does the assessment of OAHN take sufficient account of market signals as well as other market indicators in relation to the balance between the demand for and supply for housing?

- 1.9 The assessment of OAHN does not take sufficient account of market signals, given the particularly strong demand for housing in Fylde and the need to address unmet needs in the neighbouring district of Wyre.

Question 15.

Has the assessment of OAHN taken account of other factors including vacancy rates and second homes?

- 1.10 OE has no comments to make.

Question 16.

In relation to affordable housing:

a) *Is the SHMA's methodology for assessing affordable housing needs robust and in line with Government guidance?*

1.11 OE has no comments to make.

b) *The Plan recognises that the full amount of affordable housing needed per annum is not deliverable. Has the Council considered the option of a higher housing requirement to assist in delivering more affordable dwellings?*

1.12 Given the failure to deliver adequate affordable housing in previous years and a clear recognition the requisite amount of affordable housing that is needed within Fylde is not capable of being met at the levels of housing proposed, it would have been expected that Fylde Council would have given this detailed consideration as a potential plan option. OE considers that it would be wholly reasonable to establish a higher level of housing requirement for the Borough to assist in bringing forward higher levels of affordable housing as failure to do so will only serve to exacerbate the existing shortfall.

1.13 The Council's failure to do this, significantly undermines the soundness of the plan.

Question 17.

Have the needs of particular groups (e.g. the elderly) and types of housing (e.g. private rented, self-build) been satisfactorily assessed?

1.14 There is a clear and growing need across the country as a whole for the housing needs of particular groups to be addressed. The failure of the Council to undertake detailed research into these demands and prepare a housing policy basis in proportionate response again undermines the soundness of the plan.

Question 18.

Have employment trends been appropriately taken into account? Is the OAHN aligned with forecasts for jobs growth?

1.15 It is understood that the Council has not aligned the OAHN with the forecast for jobs growth within the Borough. This therefore undermines the contention that the Local Plan represents sustainable

development as there is clearly no correlation between social and economic factors in this particular respect.

Question 19.

In relation to gypsies, travellers and travelling showpeople, and further to the Council's additional evidence provided (EL1.002) following my initial questions (EL1.001a), what is the objectively assessed housing need up to 2032? Is this new identified need soundly based, consistent with national policy and supported by robust and credible evidence? What implications does this have in relation to the housing requirement for gypsies, travellers and travelling showpeople as set out in Policy H5?

- 1.16 OE has no comments to make, other than to state that national planning guidance requires the needs of these particular groups to also be fully taken into account in the preparation of an OAHN.

Issue 4 – Are the objectively assessed economic development needs clearly identified, supported by robust and credible evidence and consistent with national policy?

Question 20

Has the functional economic market area been adequately defined?

- 1.17 OE has no further comments to make on this issue.

Question 21

The SHMA assesses a range of economic development forecasts. What are the job needs and role of Fylde economically? What is the objectively assessed economic development need for the Borough?

- 1.18 OE has no further comments to make on this issue.

Question 22

Is the Plan's economic development strategy (based on a continuation of historic land take-up) justified, consistent with national policy and compatible with that for the housing strategy?

- 1.19 Given the significant change in circumstances since the previous Local Plan was adopted, in particular the identification of Enterprise Zones and the promotion of a major mixed use development on the Blackpool Periphery, it seems somewhat simplistic to base future strategy on a continuation of historic land take. This itself, has consequences for the robustness of the housing strategy.

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