

Fylde Local Plan Examination

Matter 3

Housing and employment requirements

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 5 – Is the identified overall housing requirement of 7,768 dwellings (370 dwellings per annum) over the Plan period justified and consistent with national policy?

Question 23.

Does the Council's evidence support the use of the figure of 370 dwellings per annum (dpa) as its housing requirement in the Plan? In particular:

a. Is it a soundly based figure, supported by robust evidence?

- 1.5. The figure of 370 dpa is not soundly based and is not supported by robust evidence. It fails to take into account a number of factors including the 2014 based projections, the unmet housing needs of neighbouring boroughs [Wyre in particular], the capacity of Fylde for additional development and the need to increase housing development to deliver a greater amount of affordable housing. It should be increased to at least the upper level identified in the HMA.

b. Will it ensure that the Plan meets the full objectively assessed housing needs identified in the SHMA?

- 1.6 For the same reasons, this will result in the OAHN not being met within the plan period.

c. Will it significantly boost housing supply?

- 1.7 It is unclear whether the housing supply will be significantly boosted as the housing requirement will remain constrained. What is clear is that it will not boost housing supply to a level that will meet the identified need.

Question 24.

The soundness of specific land allocations and deliverability of sites to meet the housing requirement will be considered at Stage 2 of the Examination. However, on the basis of the Plan as submitted does it confirm that there is:

a. a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption; and

1.8 The Council has not taken full account of the rate of the likely rate of development of a number of key sites within the Borough which are already behind the projected rate. In particular land at Queensway and Whyndyke Garden Village are substantially behind the projected rate of development. Together these sites are due to deliver well over a 1,000 dwellings within the plan period and therefore contribute significantly to the projected supply. Any slowdown in projected delivery would have a substantial impact upon the Council's own projections.

1.9 Accordingly, this lack of accuracy on the largest sites in the Borough undermines the credibility of the Council's projected supply for the first five years from the point of adoption, and does not give OE confidence that the projections for the smaller sites are likely to be any more accurate.

b. a supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?

1.10 Although the Council considers that the plan does indeed provide a supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption, the credibility of this is undermined by the failure to identify any further sites within or adjacent to Lytham St Annes, the largest and most sustainable settlement within the Borough. Indeed, the appropriateness of identifying land in this location was noted by the Examiner for the St Annes Neighbourhood Local Plan who specifically referred to the need to incorporate land between the settlement boundary and the long term constraint of the Green Belt, within the future settlement boundary to accommodate longer term develop needs of the settlement [Appendix CA1 of our Matter 1 Statement].

c. If you contend that the plan would not provide for either (a) or (b) above (or both) could the Plan be appropriately modified to address this?

1.11 OE considers that additional allocations are required to address the concerns set out in response to parts a) and b) of this question. The specifics of this are dealt with in our previous submissions and will be considered in detail in respect to Part Two of the Examination.

10. The current lack of flexibility is also concerning given that the Housing Requirements Paper (exam ref: ED017) clearly identifies (para. 121) that many commitments within Fylde are not progressed to completions.

- 1.12 We refer the Inspector to our para. 18 above and agree that the lack of flexibility raises significant concerns.

Issue 6 – Whether the amount of employment land (60.6 ha gross as set out in Policy DLF1 and 62 ha net in Policy EC1) is appropriate to meet the objectively assessed needs of the Borough.

Question 25

Whilst the soundness of individual employment sites will be considered at Stage 2 of the Examination, is the amount of land justified, consistent with national policy and supported by robust and credible evidence?

- 1.13. Given the projected timescales for the delivery of one of the largest identified employment sites within the plan, at Whyndyke Garden Village, OE has concerns as to whether there is sufficient employment land identified within the plan.

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