



**HALLAM LAND MANAGEMENT LTD**

**FYLDE COUNCIL LOCAL PLAN**

**EXAMINATION HEARING STATEMENT**

**HOUSING AND EMPLOYMENT REQUIREMENTS (MATTER 3)**

**ISSUES 5 AND 6**

**Date:** March 2017

**Pegasus Ref:** ST/GL/MAN.0145/R012v2

**Your Refs:** Representor No. 19

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## 1. MATTER 3 – Housing and Employment Requirements

**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?**

- 1.1 No, please refer to our Matter 2 statement.

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

- 1.2 No, please refer to our Matter 2 statement and our conclusions that the Plan should be providing for 440-450 dwellings per annum.

**(c) Will it significantly boost housing supply?**

- 1.3 Policy DLF1 sets a 'minimum' overall housing requirement of 7,768 across the plan period from 2011 to 2032 which equates to 370 dwellings per annum (dpa). This figure is also set out in Policy H1 in Chapter 10. Whilst we welcome the reference to this being a minimum target we would also recommend that this is confirmed as a net rather than gross figure, to ensure that the plan will 'boost significantly' the supply of housing. This will also align with the Blackpool Core Strategy, where reference to a net housing requirement was added as a main modification to Policy CS2 before adoption.

- 1.4 The target of 370 is derived from evidence within the Fylde Coast SHMA and its subsequent Addendums. The Council set out their approach to this within paragraphs 10.6 - 10.14 of Chapter 10. However, this target is not consistent with this evidence and does not reflect the Full Objectively Assessed Need (FOAN) of the area as set out in our Hearing Statement to Matter 2.

- 1.5 We note that completions in the Borough have rarely exceeded the 370 requirements in the Local Plan since 1991. The proposed housing requirement of 370 dpa would therefore appear to be a significant boost upon this past rate of development. However, this must be viewed in the context of:

- The adopted plan is significantly out of date. Indeed, the adopted development plan for the area comprises the saved policies of the Fylde Borough Local Plan Alterations Review (2004-2016), which was adopted in October 2005, and is an update of the Fylde Borough Local Plan (1996-2006), adopted in May 2003.
- The adopted Local Plan Alteration Review removed housing allocations from the previous version on the basis that there was only the need for 1 additional dwelling over the remainder of the plan period. As such, the Council's review of urban boundaries in 2003 was effectively nullified two years later.

- Despite the emphasis on the need to produce new up to date plans since the 2004 Act, Fylde have still failed to produce one. Fylde have therefore been without any housing allocations since 2005 and there was a very short window prior to that where statutory housing allocations were in place.
- Very low housing targets were also enforced through the Joint Lancashire Structure Plan (2001-2016) which set a requirement of just 155 dpa from 2001-2016. It was these low figures that led to the removal of the housing allocations in the Local Plan Alteration and led to a Housing Moratoria across the Borough;
- Even when the housing moratoria was removed following the adoption of the RSS, the Council adopted an Interim Housing Policy. In practice, this only allowed for housing development within defined urban areas and it was rigorously enforced by the Council.
- Even since the publication of the NPPF and the support in favour of sustainable development and the push to significantly boost housing development, our experience is that Fylde Council have persistently refused housing application in sustainable locations (and subsequently lost many at appeal);
- The Council have failed to ascertain a 5-year housing supply since the publication of the NPPF;

- 1.6 The combination of the above factors have seen a steady decline in the number of homes that have been completed in Fylde since 1991, albeit completion figures now seem to be on the rise and there are a number of large sites that now have planning permission in place that will begin to deliver. In the interim, however, affordable housing pressures have increased, which continues to highlight why a further significant boost to housing supply in Fylde over a full plan period is required.
- 1.7 What is evident is there has been a persistent level of underdeliver of housing and the 20% NPPF buffer should therefore be applied to the plan as a whole to boost delivery and stimulate competition for land.

***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 Unfortunately, we have not had scope to review the Local Plan housing trajectory in detail and therefore we cannot fully comment on the above other than 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.

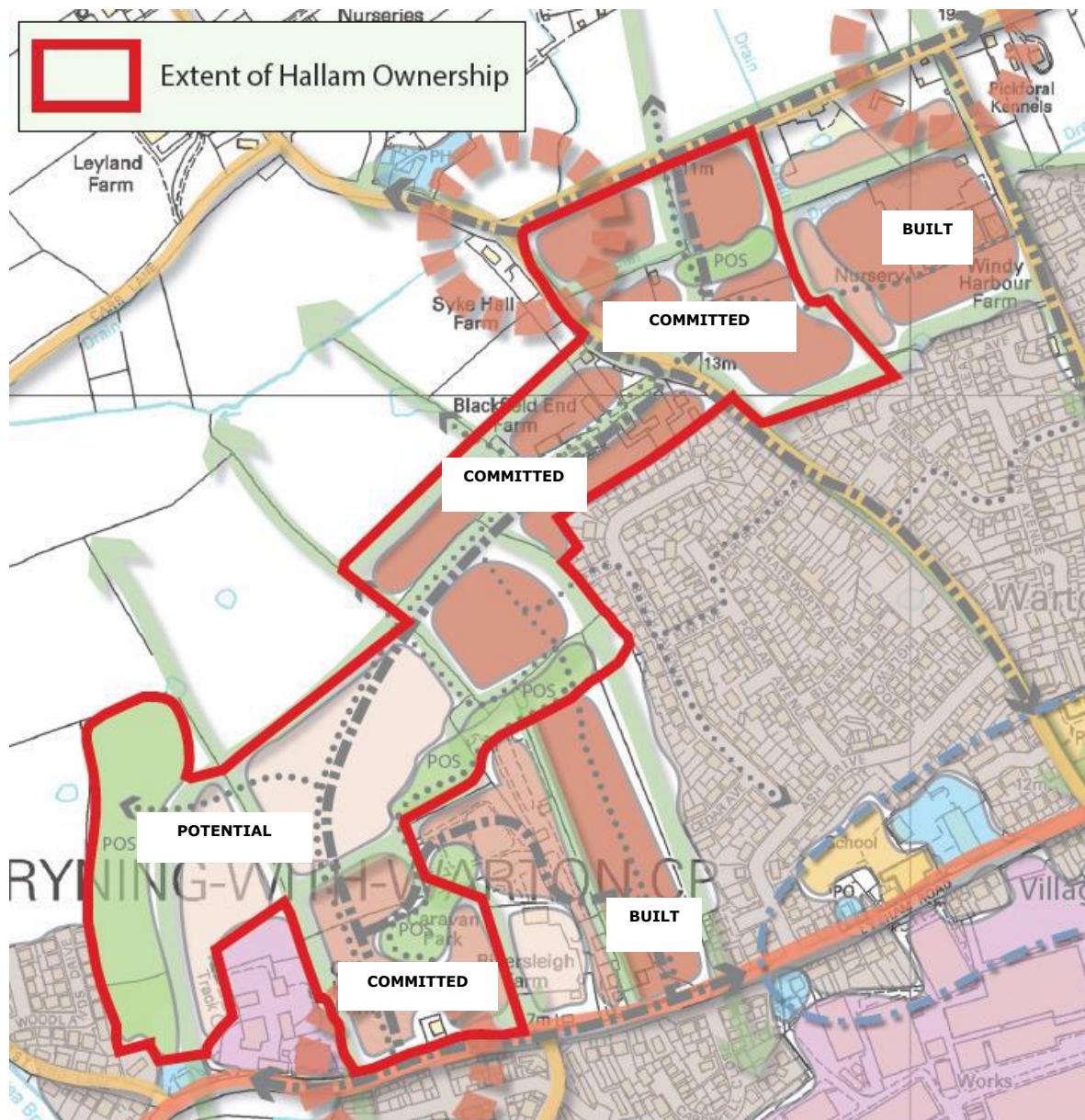
- 1.9 A range of supply figures were presented and agreed ranging from 3.2 years to 4.8 years with the lower supply calculated based on an annual requirement of 445 which is in line with the OAN figures we are advocating for the Local Plan (see paragraphs 7.12 to 7.24).
- 1.10 We accept those figures will now be out of date. Indeed, it will be necessary for the Local Plan to identify the two residential schemes that were approved by Secretary of State in Warton for 350 homes on land to the east of Warton and 115 homes on land to the west of Warton (see decision notices and Inspector's Report at **Appendix 1A and 1B**). However, we are unable to categorically confirm at this stage whether the Council can demonstrate a five-year supply based on the 370 or 440-450 housing requirement. We may.

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

- 1.11 Again, we have not had scope to assess this matter in detail and will aim to provide a verbal update at the hearing sessions. However, in the event that 370 housing target is deemed to be unsound, and that 440-450 dwellings per annum should be planned for, we are adamant that additional sites will need to be identified to make up a shortfall within this period.

***(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?***

- 1.12 Should there be an evident shortfall in deliverable housing sites either in the 5 year period or 6-10 year period, the plan could be modified to include more sites.
- 1.13 Indeed, it will be necessary for the Local Plan to be amended to include the recently approved appeal schemes at Warton regardless. We would anticipate that these sites would be included as allocations/commitments given their scale and implications for the Local Plan as a whole. We would anticipate these sites making some contribution to the 5 year supply and years 6-10.
- 1.14 As part of our representations to the Local Plan, we also noted that there was additional remaining land to the west of Warton that has development 'potential' (as shown on the plan below). Notably, this land that 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. It would therefore be a relatively straightforward exercise to append this assessment to the current SA and provide an appropriate update without causing undue delay to the production of the Local Plan. We would see this land being delivered towards the end of the 6-10 year period.
- 1.15 We anticipate this additional potential land could accommodate a further 200 dwellings over and above what has already been consented in Warton. The land would be accessed through the permitted schemes controlled by Hallam Land at Clifton House Farm and Blackfield End Farm.



**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?**

1.16 No comment.

**Appendix 1** – Appeal Decisions at Clifton House Farm (Hallam)

**Appendix 2** – Appeal Decision for Land East of Warton (Satnam)