



Gladman Developments Ltd

Fylde Local Plan Examination

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?

Q23. 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?
- b. Will it ensure that the Plan meets the full objectively assessed housing needs identified in the SHMA?
- c. Will it significantly boost housing supply?

1. The use of the figure of 370 dpa is not considered to be a soundly based. It is a significant concern that the housing target contained within the Local Plan does not correspond with the upper end of the OAN range that is set out in the SHMA. The selection of a lower figure does not reflect the NPPF's requirement to set a positive vision for the future of the area (paragraph 17). It also fails to support the requirement to proactively encourage sustainable economic growth by recognising and addressing a lack of housing (paragraph 21). Accordingly, the selection of this plan target is not considered to be a positive response to the evidence that has been prepared by the Council and does not support the NPPF's requirement to 'boost significantly the supply of housing.' (paragraph 47).
2. The selection of the upper end of the range as the basis for plan making would have represented a more positive approach and is more akin to supporting the Framework's requirement to significantly boost the supply of housing and the Plan's clear ambition for Fylde to be a location for positive growth.
3. Further, as detailed in our response to matter 2, there is a significant concern that the Council's affordable housing need will not be met. It is considered that the housing target should at least be increased to reflect the upper end of the range contained in the SHMA. In addition, strong

consideration must be given to; an uplift to support affordable housing delivery; and, to setting a housing target that more appropriately supports the ambitions of the Plan in relation to economic growth.

Q24. 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
 - b. A supply of specific, developable sites or broad locations for growth for years 6-10 from the point of adoption?
 - c. If you content that the Plan would not provide for either (a) or (b) above (or both) could the Plan be appropriately modified to address this?
4. Whilst the soundness of specific land allocations and deliverability of sites will be considered at Stage 2 of the Examination, Gladman take this opportunity to discuss the following issues.
 5. The Council's delivery assumptions set out in the Housing Trajectory appear to be largely consistent with national average delivery assumptions. However, issues such as marketing the site, the submission and determination of Reserved Matters, pre-commencement conditions, on-site clearance and the provision of infrastructure to serve development can also serve to cause delay in developing sites following the resolution to grant outline planning consent.
 6. The delivery assumptions applied to the Council's larger strategic sites need to be closely monitored to ensure that these sites are delivered at the expected rate and timescales identified. Whilst noting the infrastructure benefits that large-scale strategic allocations can provide, an overreliance on such sites can risk the deliverability of a plan and lead to further housing land supply issues in the future.
 7. It is considered that an average annual delivery rate of 30 dpa is realistically achievable, with delivery increasing depending on the number of outlets acting on site. Whilst the delivery assumptions applied for a number of sites are largely consistent with national averages, should these delivery rates not be achieved by the Plan, a significant shortfall will soon arise and further exacerbate housing shortfall in the borough. The fact that delivery of some sites continues following the end of the plan period leaves no room for slippages and should this happen provides no room for the Council to address housing shortfall in an expedited manner.

8. The above reinforces the need to identify further opportunities for development to ensure the Council is able to demonstrate a flexible and responsive supply of housing land to meet full OAN.

Issue 6 – Whether the amount of employment land (60.6ha gross as set out in Policy SLF1 and 62ha net in Policy EC1) is appropriate to meet the objectively assessed needs of the Borough.

Q25. 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?

9. The Local Plan's ambitions for economic growth are reflected through the proposed allocation of 62ha of employment land. This needs to be fully taken into account in setting an associated housing requirement to ensure that the Plan's vision for Fylde to be a location of 'positive growth' can be achieved. As such, the housing target within the Local Plan should correctly reflect the economic growth ambitions for the area.