

Fylde Council Local Plan Examination

Stage 1 Hearing Sessions

Matter 3: Housing and Employment Requirements

Submission on behalf of Metacre Ltd

13th March 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd concerning Matter 3 (Housing and employment requirements).
2. The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (V1, 6th February 2017) and supplements the representations lodged with Fylde Council on the *Local Plan, 2032 Publication Stage* (August 2016). The two should be read together.
3. This submission is concerned with Matter 3 and in particular:
 - Issue 5, Questions 23 and 24;

Matter 3, 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?

4. **Policy DLF1** (Development Locations for Fylde) establishes that the Local Plan will deliver a minimum of **7,768** net new dwellings in the period April 2011 to March 2032. This planned requirement equates to **369** dwellings per annum (dpa) and broadly aligns with the Council's conclusion in the *Fylde Housing Requirement Paper* (July 2016) (**ED017**) (and the previous Paper of 2015) that an OAHN of **370** dpa be selected as the planned housing requirement.
5. The Council's selection of the **370** dpa OAN figure represents a low position in the potential OAHN range and the selection of this figure for use in the Local Plan results in a significant under-provision of new homes over the plan period.
6. The Council has selected a low figure within the OAHN range and has sought to justify this in favour of a demographic-based FOAN at **370** dpa based on:
 - the lack of delivery of new homes in the past;
 - the inability of Fylde to accommodate economic growth; and
 - that the OAHN selected balances economic, social and environmental factors.
7. Each factor is considered further in turn.

Lack of delivery in the past

8. It is noted that the average level of completions has been approximately 210 dwellings per annum (dpa) over the 13 year period since 2003/4, however, this completion rate has been affected by:
 - the absence of a Local Plan identifying how the Borough's housing requirements are to be delivered, with a reliance on windfall housing development;
 - a housing moratorium;
 - the Council's reluctance to support planning applications for large greenfield edge of settlement housing development despite a clear need to release large greenfield sites to address the Borough's housing shortfall.
9. The above factors will have fundamentally affected the historical completion rate and thus it is inappropriate for the Council to suggest that a lack of delivery in the

past justifies selecting a low figure within the OAHN range. This is expanded upon below.

10. The 1996-2006 Fylde Local Plan, which was adopted in May 2003, did not identify any housing allocations and the defined settlement limits were drawn in a restrictive manner as the strategic housing requirement over the remaining plan period had already been met by existing commitments. The Council subsequently adopted the 2004-2016 Local Plan Alterations Review, which introduced an effective moratorium on new residential development.
11. The advent of the Regional Spatial Strategy for the North West (RSS) changed the position. The RSS identified a higher annual housing requirement for Fylde between 2003-2021, closer to the level prior to the introduction of the Joint Lancashire Structure Plan (JLSP). The JLSP had reduced Fylde's annual housing requirement by 45% compared to the previous Structure Plan.
12. Consequently, the adopted Local Plan not only had no housing allocations or strategy in place to deliver the RSS housing requirement, with there being a complete reliance on windfall development, but the defined settlement boundaries had been drawn in a restrictive manner on the basis that new housing was to be strictly regulated. There had even been a housing moratorium in place prior to the RSS.
13. Ever since the publication of the RSS it has been evident that significant edge of settlement greenfield development is required if the Borough's housing needs were to be delivered. This was the clear opinion of the Council's own Planning Policy Team. Indeed in a consultation response, dated August 2009, to an outline application for residential development on greenfield land on the edge of Kirkham/Wesham (application 08/1072 and now proposed allocation HSS8) the Council's policy team advised that:

"...the settlement boundaries in the FBLP were set in circumstances where the development of further greenfield land was not envisaged. As such, having regard to the requirements of Policy L4 of the RSS and the results of the SHLAA, it is for all intents and purposes certain that some significant housing development will be

required in Countryside Areas within the period to 2021. For this reason it may be concluded that the settlement boundaries as shown in the FBLP are out of date.”

14. This position has also been accepted in numerous s.78 appeals. For example the Inspector considering the recovered appeal for 1,150 dwellings at Queensway (now proposed allocation HSS1) confirmed back in 2012 that:

“It is common ground that planning permissions beyond settlement boundaries will be required if the housing land shortfall is to be addressed in accordance with national guidance” (paragraph IR409 of the recommendation report)

15. Despite a clear out of date Local Plan and continued failure to deliver the Borough’s annual housing requirement, resulting in a continually rising housing shortfall, Fylde continued to refuse large housing developments forcing applicants obtain permission via s.78 appeals. For example of those sites identified in the Council’s housing trajectory the following had to be granted on appeal, totalling 2,400 dwellings.

Local Plan Ref.	Site	No. of dwellings	Comments
HS21	11-63 Westgate Road	70	Approved on appeal. Subject application had an officer recommendation for approval.
HS29	Crossacres, Wesham	106	Original outline permission approved on appeal following non-determination by Council
HSS1	Land south of Queensway	1,150	Outline permission originally approved on appeal following Council’s non-determination.
HSS2	Blackfield End Farm, Warton	360	Approved on appeal following Council’s non-determination.
HSS8	The Pastures, Wesham	262	Granted on appeal. Subject application had officer recommendation for approval.
HSS9	Land north of blackpool road, Kirkham	117	Granted on appeal
HSS9	Land north of Blackpool Road, Kirkham	180	Granted on appeal after Council’s non-determination
HSS11	Willow Drive, Wrea Green	100	Granted on appeal
HS45	54 Bryning Lane, Wrea Green	25	Granted on appeal. Subject application had recommendation for approval.
HS40	Kings Close, Staining	30	Granted on appeal. Subject application had recommendation for approval.
	Total	2,400	

16. The lack of an up-to date Local Plan positively setting out how development requirements are to be delivered, the housing moratorium in earlier years, the restrictive settlement boundaries drawn at a time when no additional housing was deemed necessary, and a general reluctance to support planning applications for greenfield settlement extensions, have all contributed to the average completion rate being below the Council's identified housing requirement.
17. It is noted that Fylde suggest in their response of 27th January 2017 that the rate of development over the 4 years between 2012-2016 has been consistently well below commitments and that an increase in commitments has not had an impact on completions. Many planning permissions, particularly for large sites, are initially granted in outline form and can therefore be identified as commitments for sometime before development actually commences. Allocated site HSS8 is a case in point. Phase 1 was initially granted outline permission on appeal in August 2013 but it took a further year before reserved matters were approved in July 2014, and given the need to submit further evidence to discharge conditions and undertake necessary infrastructure, the first dwelling was not completed until Spring 2015. At a rate of 30 dwellings per annum it will take the developer over 8 years to build out this 259 dwelling site.
18. The commitment figures are also skewed by the Queensway site (ref. HSS1). Outline planning permission was granted on appeal for 1,150 dwellings in 2012, but due to various constraints and a need to amend the s.106 Agreement on viability grounds, development only started to commence in December 2017.
19. Accordingly past completion rates in Fylde is not a sound justification for selecting a low figure within the OAHN range.

Inability to accommodate economic growth

20. The inability of Fylde to accommodate economic growth is not due to any lack of available, suitable land or potential sites; it appears to be based on the Council's inability to set out a spatial plan and positively allocate sufficient housing and employment sites to deliver what is needed. As the Housing Requirement Paper notes at paragraph 47, for the Fylde economy to grow, there will be a need in-migration of working age people to replace the large number of people who are

likely to retire in the period to 2032. New housing is therefore needed to accommodate new workers and a choice, mix and ready availability of housing supply will support this to be achieved. The draft Plan does not currently take this approach and it is considered that the lack of a positive approach to securing appropriate levels and choice of housing is likely to fetter economic growth. Put simply, there is no lack of ability to find and allocate appropriate levels of housing land supply, rather a lack of determination to deliver this.

21. In addition, the SHMA *Addendum 2* (**ED023**) is clear (as recorded at paragraph 68 of the *Housing Requirements Paper*) that the OAHN ranges up to **440-450** dpa to account for employment-led housing growth. It is also important to note that the economic modelling did not itself account for a more significant level and rate of economic growth due to the investments made by the Local Enterprise Partnership or the designation of two Enterprise Zones in and at the border of Fylde.
22. There are therefore evident economic factors in the employment-led housing growth scenarios modelled in SHMA *Addendum 2* to show why there needs to be a higher OAHN figure than that selected. Metacre's response to Matter 2, Issue 3, Question 18 deals with this in greater detail.

Whether the OAHN balances economic, social and environmental factors

23. The Council conclude that the proposed OAHN planned housing requirement is a balanced response to economic, social and environmental factors. Based on the evidence presented herein (and in response to other Hearing Matters by Metacre), it is concluded that the Fylde Plan fails to achieve a balance with insufficient levels of new housing proposed leading to economic and social imbalance.
24. In conclusion, and for reasons set out in this submission and other Metacre submissions to Matters 1 and 2, Fylde's suggested figure of 370 dpa is not 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?

25. It is Metacre's view that the Plan does not meet the full, objectively assessed housing needs identified in the SHMA, nor the evident unmet need arising from Wyre District (see Metacre's response to Matter 1 concerning the Duty to Co-operate).
26. The approach to un-met need in the Plan is not justified. The plan-preparation process, including effective co-operation and collaboration on strategic housing matters would have enabled Fylde Council to identify a housing requirement that met the full, objectively assessed needs of the Housing Market Area and provided adequately and without uncertainty for all such housing needs, including those of the neighbouring authority.
27. Unfortunately, and incorrectly in relation to paragraphs 50 and 159 of the NPPF, as currently drafted the Plan leaves the conclusion of the housing requirement that Fylde should make provision for to another time after the Plan is adopted.
28. None of the factors that Fylde Council pray in aid to support the selection of an OAHN and a planned requirement significantly below the levels necessary to meet both demographic and economic growth in the District are justified. The Plan, as drafted fails therefore to respond sufficiently to:
- projected economic growth and under-estimates the potential for greater growth due to the LEP and two Enterprise Zones objectives (see Metacre's response to Matter 2, Issue 3, Question 18);
 - affordability issues (see Metacre's response to Matter 2, Issue 3, Question 16); or
 - the accommodation of un-met housing needs arising in Wyre District (see Metacre's separate response to Matter 1, Issue 1, Question 3).
29. The Council's selected OAHN figure is unlikely to meet the assessed housing needs of the area. It is fundamentally flawed and lacks credible justification.

30. The implications of an OAHN planned requirement that fails to meet evident needs include:
- a mis-alignment between the proposed economic development and jobs growth objectives of the LEP and the Government and private sector investment in two Enterprise Zones within and at the border of Fylde, with an increasing difficulty for those employed in the District to form or maintain a household or for the area to alter its current commuting pattern which relies on a significant inflow of workers from outside the District;
 - adverse effects on the ability of Fylde (and of its neighbours through displacement of un-met needs) to meet the full objectively assessed housing needs;
 - an increasing imbalance between evident demand for homes with the supply available;
 - an inability to meet the acute levels of affordable housing need that remain.
31. There is no credible justification in the SHMA, its two Addenda or the *Housing Requirements Paper* to support the significant difference in the dwelling requirements proposed in the Plan with the projections set out in the evidence base. Fylde's figure of 370 dpa will not ensure that the Plan meets the full objectively assessed housing needs.

c) Will it significantly boost housing supply?

32. The Plan's proposed OAHN figure does represent an increase from the rates of housing delivery achieved prior to the economic recession, although past completion rates in Fylde have been affected by the absence of any strategic housing policy aimed at delivering housing requirements (see submission to question 23a above). The planned requirement also represents an increase above the base demographic level of housing need (the Household Projection 'starting point'), but is below the OAHN based on employment-led housing growth.

33. Ultimately the OAHN figure is not adequately identified or evidenced. The Plan's housing target is insufficient to meet the District's own housing requirements, let alone help meet unmet needs arising from Wyre District which forms part of the same Housing Market Area as Fylde and Blackpool.
34. For the reasons set out above (and detailed in response to Matter 2 issues and questions) Metacre conclude that the planned requirement will not significantly boost the supply of housing in Fylde to a level that will meet the evident needs. This is inconsistent with paragraphs 47 and 159 of the NPPF and results in an ineffective, unjustified and unsound Plan.

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;

35. In Fylde's 27th January response to the Inspector's preliminary questions, they provide a summary table to show the five year housing land supply at the point of the Local Plan adoption (2017). Fylde suggest that:
- The 5-year housing supply requirement including 20% buffer for the period 2017-2022 is 2,520 dwellings, which is based on an annualised requirement of 420 dwellings.
 - The Local Plan can deliver a total of 3,471 homes over the five years following adoption.
 - The Local Plan would have a supply surplus of 951 dwellings on adoption.
36. Metacre disputes this suggestion, both in terms of the suggested five year housing requirement and in terms of the suggested deliverable housing supply.

37. Firstly, the methodology used by Fylde to calculate the Local Plan five year housing requirement is contrary to National Policy / Guidance and even contradicts the approach used by Fylde in their own Housing Supply Statement.
38. Fylde's most recently published Five Year Housing Supply Statement (HSS) has a base date of March 2016 and uses the Local Plan's suggested OAHN figure of 370 dpa to calculate the five year housing requirement, which is identified as 3,181 dwellings:
- a. Housing requirement 2011-2016 (370 dpa x 5yrs) = 1,850
 - b. Housing completions 2011-2016 = 1,049
 - c. Housing shortfall at March 2016 = 801
 - d. 5yr housing requirement 2016-2021 (370 dpa x 5yrs) = 1,850
 - e. Plus 801 housing shortfall = 2,651 (530dpa)
 - f. Plus 20% buffer = 3,181 (636 dpa)
39. It will be noted that in the HSS Fylde acknowledge that the entire housing shortfall since the start of the Plan period should be delivered within the next five years, aka the Sedgefield approach. This has been the Council's approach for a number of years and is supported by Metacre.
40. The Local Plan however now seeks to apply the Liverpool method of spreading the housing shortfall across the whole plan period. This is clearly evident from the housing trajectory in Local Plan Appendix 2 which identifies the adjusted annual requirement for 2016/17 onwards, pre-buffer, as 420 dpa, i.e.:
- a) Housing shortfall 2011-2016 = 802¹
 - b) 802 shortfall spread over remaining 16yrs of Local Plan = 50dpa
 - c) Local Plan OAN requirement of 370dpa + 50dpa = 420dpa
41. By applying the Liverpool approach in the Local Plan Fylde are essentially only aiming to deliver 250 of the 802 dwelling shortfall over the next five years. After the 20% buffer is applied, it alters the five year housing requirement at the 2016/17

¹ The dwelling completion figure in Fylde's HSS differs to the Local Plan figure by 1 dwelling

base date from 3,181 dwellings, as identified in Fylde's HSS, down to 2,520 dwellings as identified by Fylde in their 27th January response.

42. Bearing in mind that at 2016/17 we are already 5yrs into the Local Plan period, this means pushing 69% of the current housing shortfall to the latter half of the plan. Such an approach would simply compound past under delivery in direct contrast to significantly boosting the housing supply as required by NPPF 47.

43. Sedgefield is clearly supported by National policy / guidance, as it seeks to make up the housing shortfall quickly and enable housing delivery to proceed at the rate planned. Indeed PPG states:

“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible.” (PPG ID:3-035)

44. Fylde had argued the Liverpool approach at a recovered s.78 appeal for 320 dwellings at Tarnbrick Farm back in 2013. When granting planning permission the SoS confirmed in paragraph 13 of the decision notice that he endorsed the Inspector's conclusions at IR208-221, with IR209 stating that *“The supply, even if the Council's figures are adopted, which would make up the shortfall over a significant period of time, and which I consider would not be the most desirable route, would only amount to 3.1 years housing land”* (self-emphases). IR217 also states *“The shortfall should be made up as quickly as possible to accord with the aspirations of the Framework to significantly boost the supply of housing.”*

45. For a number of years now Fylde have accepted that the housing shortfall should be delivered within the five year period, as confirmed in their annual HSS, and they have provided no justification as to why the Liverpool approach is now being suggested in the Local Plan.

46. Secondly, in their 27th January response to the Inspector's preliminary questions Fylde still identify the five year requirement from the adoption date of the plan as 2,520 dwellings. Rather than updating the housing requirement evidence to a 2017/18 base date, by taking into account completions and demolitions in 2016/17, Fylde have simply continued to apply the aforementioned 420 dpa adjusted figure. Based on Fylde's historic completion rate there is a distinct

possibility that when the housing position is updated for the March 2017 base date the housing shortfall may have increased. This would mean the five year requirement would be higher as a result. You simply cannot use the housing requirement position at March 2016 to demonstrate that there is a five year supply from March 2017 onwards. If the only complete housing evidence available has a base date of March 2016 then the five year supply position has to be calculated using that base date.

47. Fylde's suggestion that the five year housing requirement from Local Plan adoption is 2,520 dwellings is therefore unsound. Firstly, it is not possible to calculate what the five year requirement is for a 2017/18 base date as the required evidence has yet to be published. Secondly, the housing shortfall should be addressed within the five year period, ala Sedgefield, and not pushed back to later parts of the plan period, ala Liverpool.
48. The five year requirement based on Fylde's suggested OAHN of 370dpa with a 20% buffer is therefore 3,181 dwellings, as stated in Fylde's own Five Year HSS. However, it should be noted that Metacre consider that the 370 dpa figure does not meet the full OAHN. If the employment-led OAHN figure of 440-450 dpa (Fylde's SHMA Addendum 2) is used then the five year requirement would be circa 4,082 dwellings. This is demonstrated below using the mid-point between the 440-450 range.
- a) Housing requirement 2011-2016 (445 dpa x 5yrs) = 2,225
 - g. Housing completions 2011-2016 = 1,048
 - h. Housing shortfall at March 2016 = 1,177
 - i. 5yr housing requirement 2016-2021 (345 dpa x 5yrs) = 2,225
 - j. Plus 1,177 housing shortfall = 3,402
 - k. Plus 20% buffer = 4,082 (816 dpa)
49. With regards to the housing supply, Fylde's suggested five year deliverable supply of 3,471 dwellings between 2017-2022, as set out in their 27th January response, is simply an extract from their trajectory in Local Plan Appendix 2. As with the housing requirement evidence the delivery rates for individual sites have not been updated to a March 2017 base date. Accordingly, Fylde are using both the

requirement and supply evidence from March 2016/17 to try and demonstrate a five year supply from a 2017/18 base date. This is unsound.

50. Furthermore, Fylde are overestimating the extend of the deliverable supply. For example:

Sites MUS2 Whyndyke Farm and HSS2 Blackfield End Farm

51. It is not disputed that these two sites will come forward for development however the Local Plan trajectory is considered optimistic in terms of when the two sites will start delivering housing.

- *MUS2 Whyndyke Farm.* Fylde's five year trajectory anticipates the first dwellings being built in 2018/19. Whilst Fylde's Development Control Committee have resolved to grant outline planning permission, this has yet to be issued as the required s.106 Agreement is still being produced. The applicants are landowners, not developers, and the site will therefore require marketing as well as reserved matters applications to be submitted / approved. There are also a significant number of conditions which require discharging before development can commence. Even for a smaller site it would be reasonable to assume under such circumstances that the first dwellings are unlikely start coming forward for another 2 years. Indeed Fylde's HSS states that for sites with outline permission awaiting the signing of a s.106, dwellings are not anticipated until year 3 of the 5yr period. However, Whyndyke Farm is a major strategic site for 1,400 dwellings, 20ha of Class B2 / B8 uses, Primary School, two Local Neighbourhood Centres, Class A4 and D1 uses, together with open space and other infrastructure, including an internal distributor road together with improvement schemes to the M55 junction and other off-site highway works. The proposed conditions on the Committee Report require some of this infrastructure to be implemented prior to the occupation of the first dwelling. Fylde's suggestion that 30 dwellings will be delivered on this site in 2018/19 is therefore unrealistic. It is unlikely that this site will start to deliver housing until 2020/21.

- *HSS2 Blackfield End Farm.* The Local Plan trajectory shows this site delivering housing from 2017/18, however, the developer only submitted the Reserved Matters application in February 2017 (ref. 17/0129) and there are also conditions on the outline approval which need discharging. When combined with the site infrastructure it is evident that the delivery of this site has slipped by a year.

52. This means that Fylde are overestimating the deliverable supply from these two sites by **150 dwellings**.

Site		2016/17	2017/18	2018/19	2019/20	2020/21	Total
MUS2	Local Plan	0	0	30	60	60	150
	Metacre		0	0	0	30	30
HSS2	Local Plan		15	30	30	30	105
	Metacre			15	30	30	75

Sites HSS4 Coastal Dunes, HSS1 Queensway and MUS1 Cropper Road East

53. With regards to general delivery rates Fylde assumes that 15 homes will be built in the first year and 30 homes p/a in subsequent years. However, if the site has a capacity of more than 300 homes Fylde assumes that there will be two developers and thus the output is doubled. The assumption that there would be two developers on larger sites is reasonable where no developer is currently on board, however, where evidence indicates that a site is being brought forward by a single developer there is no justification for applying this greater delivery rate. This is applicable to the following sites:

- *HSS4 Coastal Dunes.* This is the former Pontins site on the edge of Blackpool where development is proposed in two phases. Phase 1 has already received planning permission and is under construction by Persimmon Homes. Phase 2 has also been purchased by Permission Homes who have submitted a full planning application for the remainder of the site. Evidence therefore clearly indicates that whilst this site comprises over 300 dwellings it is nevertheless being brought forward by one developer. The standard delivery rate of 15 dwellings in yr1 and 30 dpa thereafter is therefore applicable.

- *HSS1 Queensway*. Whilst this site exceeds 300 dwellings housing developer Kensington Developments Ltd has secured reserved matters approval for phase 1 and have submitted reserved matters for the remainder of the development. This indicates one developer. Furthermore, Fylde assumes that 30 dwellings will be delivered from this site in 2016/17. It is understood that the Phase 1 development did not actually commence until December 2016 and given the need for infrastructure before the first dwellings are completed the delivery of this site has also evidently slipped by a year.
- *MUS1 Cropper Road East, Whitehills*. This Local Plan allocation is split into four sites, two of which are sited adjacent to one another and owned by the developer Wainhomes. One of these two sites has planning permission for 145 dwellings and is under construction, the other has outline permission for 80 dwellings and Wainhomes have submitted a Reserved Matters application (16/0847). Moreover the submitted layout shows the 80 dwellings site being accessed via the larger site. Evidence therefore indicates that the smaller 80 dwelling site will be phase 2 and brought forward after Wainhomes have completed the 145 dwellings currently under construction. Fylde treat these two sites as though they are being completed by separate developers and show them both being developed at the same time.
- *HSS5 Cropper Road West, Whitehills*. Fylde's table in their 27th January response states that this site is owned by Wainhomes and that an application is expected shortly. If there is known to be only one developer then there is no justification for the higher delivery rate.

54. When the above is taken into account Metacre consider that Fylde are over estimating the five year delivery from these sites by **410 dwellings**.

Site		2016/17	2017/18	2018/19	2019/20	2020/21	Total
HSS4	Local Plan	60	60	60	60	60	300
	Metacre	30	30	30	30	30	150
HSS1	Local Plan	30	60	60	60	60	270

	Metacre	0	15	30	30	30	105
MUS1	Local Plan	15	30	30	30	30	135
		0	15	30	30	5	80
	Metacre	15	30	30	30	30	135
		0	0	0	0	0	0
HSS5	Local Plan					30	30
	Metacre					15	15

Sites HS12 Fairways, HS13 Kingsway Garage, HS14 AXA and HS32 West End Residential Park

55. These sites are all the subject of planning applications where the Council's Development Control Committee has resolved to grant planning permission subject to a s.106 Agreement, but where there has been no progress in this matter for a number of years. Indeed had planning permission been granted when the Committee resolved to approve the applications all of these permissions would have now expired.

- *HS12 Fairways, St Annes (20 dwellings)*. Fylde DC Committee resolved to grant outline planning permission subject to a s.106 over 9 years ago in 2008 (08/0092). The Council's web site indicates that there is still no completed s.106 and thus no planning permission.
- *HS13 Kingsway Garage, St Annes (30 dwellings)*. Fylde DC Committee resolved to grant outline planning permission subject to a s.106 over 4 years ago in Oct 2012 (11/0667). The Council's web site indicates that there is still no completed s.106 and thus no planning permission.
- *HS14 AXA site, Lytham (45 dwellings)*. Fylde DC Committee resolved to grant outline planning permission subject to a s.106 over 3 years ago in Sept 2013 (13/0152). The Council's web site indicates that there is still no completed s.106 and thus no planning permission.
- *HS32 West End Residential Park, Kirkham (27 dwellings)*. Fylde DC Committee resolved to grant outline planning permission subject to a s.106

over 4 years ago in Oct 2012 (12/0376). The Council's web site indicates that there is still no completed s.106 and thus no planning permission

56. The fact that these sites have not been brought forward for development in over 3 years and in one case 9 years, despite having a Committee Resolution to approve, suggests that there are constraints. The sites should not therefore be counted towards the deliverable five year supply, reducing it by **122 dwellings**.

Site		2016/17	2017/18	2018/19	2019/20	2020/21	Total
HS12	Local Plan			15	5		20
	Metacre			0	0		0
HS13	Local Plan			15	15		30
	Metacre			0	0		0
HS14	Local Plan			15	30		45
	Metacre			0	0		0
HS32	Local Plan		15	12			27
	Metacre		0	0			0

Sites HS2 Jubilee House, HS30 Pennine View, HS47 North View Farm, HSS3 Singleton Village, HS4 The Gables and HS6 North Promenade

57. The Local Plan supply includes the following sites which were either granted planning permission a number of years ago and the permissions have now expired, or planning applications were submitted but have been withdrawn, or a start on site was made some years ago but there has been no apparent progress, or there is a history of unimplemented planning permissions and the latest extant permission is due to expire very shortly.

- *HS2 Jubilee House, Lytham* (20 dwellings). This site is a business park and some 14 months after securing outline residential consent planning permission was sought and granted for the erection of a sign displaying the occupants of the offices (ref no. 14/0762). The residential consent (13/0001) also expired in August 2016. This suggests that the owner does not intend to seek the residential redevelopment of the site.

- *HS30 Pennine View, Wesham (12 dwellings)*. This site has a history of unimplemented planning permissions such as 10/0307 which obtained a resolution to approve subject to a Section 106 Agreement which the applicant failed to sign. The latest application obtained outline planning approval in September 2013 (13/0364) which expired in September 2016. This suggests that there are constraints preventing this site being brought forward.
- *HS47 North View Farm, Wrea Green (15 dwellings)*. An outline application for 15 dwellings (14/0880) and a full application for 11 dwellings (15/0296) were submitted over 2 years ago but according to the Council's web site both applications were withdrawn and there have been no resubmissions.
- *HS53 Singleton Village, Singleton (15 dwellings)*. An outline application for 15 dwellings (14/0652) was submitted over 2½ years ago but according to the Council's website this was withdrawn and there have been no resubmissions.
- *HS4 The Gables (19 dwellings)*. Planning permission was granted in 2006 (05/0648) and a start on site was registered as having occurred in April 2008, however, the Local Plan trajectory shows that no dwellings have been completed in the intervening 9 years. Unless the development is now underway evidence suggests that this site is not being brought forward.
- *HS6, 68 North Promenade (12 dwellings)*. Outline planning permission was originally granted in April 2013 (08/0853) and was then renewed in June 2014 (13/0744). There is no evidence on the Council's web site of Reserved Matters having been submitted and the latest outline permission expires in 3 months on 9th June 2017. Moreover, these permissions require the demolition of 68 North Promenade and in June 2015 planning permission was granted for a single storey domestic extension to 68 North Promenade (15/0228). The Building Control record ref: R/BN/15/0413 also confirms that this extension has been completed. This suggests that the owner does not intend to seek the residential redevelopment of the site.

58. The above sites should not therefore be included within the deliverable supply, which reduces the supply by **93 dwellings**.

Site		2016/17	2017/18	2018/19	2019/20	2020/21	Total
HS2	Local Plan	15	5				20
	Metacre	0	0				0
HS30	Local Plan		12				12
	Metacre		0				0
HS47	Local Plan			15			15
	Metacre			0			0
HS53	Local Plan			15			15
	Metacre			0			0
HS4	Local Plan	15	4				19
	Metacre	0	0				0
HS6	Local Plan	12					12
	Metacre	0					0

Sites HS21 Westgate Road and HS37 The Refuge

59. With regards to the following two sites it is evident that less dwellings are being proposed than identified in the Local Plan housing trajectory.
- *HS21, 11-63 Westgate Road, St Annes.* Whilst outline permission was granted on appeal for 70 homes in August 2009 (12/0499), the Council granted planning permission for a smaller development of just 25 apartments in Nov 2016 (16/0194).
 - *HS37, The Refuge, Freckleton.* Whilst outline planning permission was granted for 13 dwellings on appeal in December 2013 (13/0262) planning permission has subsequently been granted in December 2016 to erect just 11 dwellings (16/0609).
60. When the Local Plan trajectory is amended accordingly the five year supply is reduced by **47 dwellings**.

Elswick Neighbourhood Development Plan

61. The housing trajectory includes an allowance of 50 dwellings from the Elswick Neighbourhood Development Plan allocation. Whilst the Neighbourhood Plan area has been approved and a questionnaire to local residents circulated, there has been no further progress. Until such time as this Neighbourhood Plan is adopted and housing sites identified it is inappropriate to include an allowance for sites coming forward within the deliverable five year supply. It is simply unknown how long this process will take and thus when dwellings will start to be delivered. This allowance should therefore be removed, resulting in a **50 dwelling** reduction.

Small Scale Windfall Allowance

62. The Local Plan trajectory includes an allowance of 75dpa from small scale windfall developments (375 dwellings in total over five years). In their response of 27th January Fylde justify this by referring to the fact that there are 326 small sites with planning permission and 57 small sites which the Council are minded to approve, i.e. a total of 383 which equates to 77 completions per year for four consecutive years with 75 completions in 2020/21.
63. There is no guarantee that small site approvals will be built out, with many permissions lapsing for a variety of reasons. Just because there happen to be 382 committed dwellings / minded to approve, does not therefore mean that 382 dwellings will be delivered over the five year period. Fylde's submitted evidence shows that the average annual completions from small windfall sites in the last 5yr period was 35 dpa. The average is also 35 dpa in the last 10 year period.
64. Accordingly, historic completions suggest 35 dpa from small windfall sites would be more appropriate (175 over the 5yr period) rather than Fylde's suggested 75dpa (375 in total). This reduces the supply by **200 dwellings**.

Empty Homes Allowance

65. Fylde include an allowance of 10 dpa for long term empty homes re-entering the market (50 dwellings in total over five year supply). PPG states that "*Empty homes can help to contribute towards meeting housing need but it would be for individual local authorities to identify and implement an empty homes strategy. Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local planning authority*

at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting..” PPG ID 3-039

66. It is considered that Fylde have not provided sufficiently robust evidence to justify this allowance. Indeed there is no such allowance in Fylde’s HSS and if excluded the five year supply is reduced by **50 dwellings**.
67. In summary Fylde’s housing trajectory suggests that from a 2016/17 base date there is a deliverable supply of 3,546 dwellings within five years, but when this supply is adjusted to take account of the above matters it falls by 1,122 dwellings to 2,424. As previously highlighted the five year requirement from this base date is either 3,181 dwellings (636 dpa) if the Local Plan suggested OAHN requirement figure of 370dpa is applied, or 4,082 dwellings (816 dpa) if their employment-led OAHN figure of 440-450 dpa is applied (which still makes no allowance for assisting Wyre). This equates to a supply between 3.8 and 3.0 years respectively.
68. Fylde have yet to provide sufficient evidence to enable a proper and justified assessment of the deliverable supply based on a March 2017 base date, but given Metacre’s identified concerns regarding the deliverability of the identified sites it is highly unlikely that there will be a deliverable five year supply.
69. It is therefore considered that the Plan as submitted fails to comply with the requirement of NPPF 47 to ensure that the Local Plan identifies a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements, with an additional 20% buffer to provide a realistic prospect of achieving the planned supply.

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

70. Were the plan to be adopted in 2017/18 year 10 would be 2026/27. Based on Fylde’s suggested 370 dpa requirement the total Local Plan housing requirement by year 10 of adoption would be 5,920 dwellings (16yrs x 370dpa). If the mid range employment-led OAHN figure of 445 dpa were applied then the requirement would be 7,120 (16yrs x 445dpa).

71. Fylde's Local Plan housing trajectory suggests that the allocated sites and windfall allowances will deliver a total of 6,928 dwellings by the end of 2026/27. There are no broad locations for growth identified. Whilst this suggests that the Local Plan has a supply of specific deliverable sites for years 6-10 based on a 370dpa requirement (but not a 445dpa requirement), it has already been highlighted how the Council are significantly overestimating the anticipated delivery from these sites. If you adjust the delivery to allow for those aforementioned sites where development has slipped and/or where the rate of delivery is less than anticipated due to there being only one developer, the supply falls by 698 dwellings (Appendix 1). Two of the aforementioned sites are being developed for 47 less dwellings than anticipated and the empty homes allowance of 50 dwellings is considered unjustified. As previously highlighted it is considered that the small windfall allowance from 2016/17 onwards should be 35dpa not the suggested 77dpa followed by 40dpa, which would reduce the supply by a further 238 dwellings. Combined this reduces the supply by 1,033 dwellings to 5,895, bringing it below the requirement irrespective of which OAHN figure is applied. This is before the delivery of any other sites are examined.

72. Metacre do not therefore consider the Local Plan to have supply of specific deliverable sites or broad locations for growth for years 6-10 from adoption.

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?

73. There are numerous opportunities for the Council to allocate additional housing land across the Borough which would help address this shortfall in provision, such as sites identified by Metacre Ltd in representations to the Published Plan.

APPENDIX 1

