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13 March 2017

**By email and post**  
**Tony.Blackburn@fylde.gov.uk**  
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Dear Tony

**FYLDE LOCAL PLAN EXAMINATION – MATTER 3 HOUSING AND EMPLOYMENT REQUIREMENTS**

The following hearing statement is written on behalf of administrators of Greenhurst Investments Ltd (Greenhurst). The statement responds to selected questions set out within Matter 3 of the Inspector's Matters, Issues and Questions.

The following responses should be read in conjunction with comments made to the submission version of the Local Plan, dated September 2016. Indigo has also expressed a desire to attend the examination hearing sessions.

**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?**

**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?**

No, I refer the Inspector to our comments upon matter 2, but for ease summarise our points below.

The Council has not updated its OAHN using the most up-to-date data available (ie 2014 based sub-national household projections). A full remodelling of the demographic and employment-led scenarios should be completed using 2014 data, which could lead to a greater change than the Council's suggested 1% change.

Furthermore, in our Matter 2 representation, we highlight the shortcomings of the Council's SHMA which applies a small level of upward adjustment to the planned housing numbers despite clear evidence of market stress and worsening trends.

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

No, I refer the Inspector to our comments upon matter 2 and above, but for ease summarise our points below.

The SHMA Addendum 2 concludes at paragraph 5.27 and 5.28 that the Employment-led AECOM and Oxford Economics scenarios suggests a need for between 440 and 450 dwellings per annum. The upper end of the range would represent the OAN on the basis of the considered economic position within the Council's evidence base.

The Council is not planning to delivery its full affordable housing need which would have far reaching consequences in terms of worsening housing affordability, a problem currently experienced by residents of Fylde, as identified by the SHMA.

It is therefore considered that the identified housing requirement of 370 dwellings per annum is unlikely to meet the base level of demographic need and instead the OAHN should be set towards the upper end of the range identified by the Council.

**c. Will it significantly boost housing supply?**

As drafted the Local Plan will lead to too few homes being built. There is a significant shortfall in the proposed housing target against objectively assessed housing needs.

**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**

We refer the Inspector to the representations made in September 2016 in respect of this question, where we highlighted Indigo evidence to suggest that the Council has a housing land supply in the region of 3.6 years, against the 370 dwelling per annum figure in the Local Plan.

It is clear that the annual dwelling figure should be increased (see comments on Matter 2), and therefore the housing shortfall is actually worse.

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

The Local Plans Expert Group's Report to Government (March 2016) recommends that local plans should be required not only to demonstrate a five-year land supply but also focus on ensuring a more effective supply of

developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable 'Reserve Sites' equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF.

The Local Plan does not do this and nor does it deal with the record of persistent under delivery of housing across Fylde. The proposed housing requirement fails to meet Fylde's OAHN (see comments on Matter 2).

Fylde Council should include a buffer of housing sites if allocated sites fail to come forward as planned. This is particularly important given the geographical constraints and the need to meet Wyre's unmet housing need. Including a buffer of housing sites would demonstrate the Local Plan has been positively prepared and would provide the best opportunity of housing needs being met.

**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?**

There are fundamental shortcomings in the draft Local Plan that necessitates a rethink of the housing and employment requirements in Fylde. More housing allocations are required to meet Fylde's housing need and little has been done to help meet Wyre's unmet housing need. The SHMA also notes that many commitments within Fylde are not progressed to completions (paragraph 121).

This is of serious concern that could, in effect, require the rewriting of the Plan and be so substantial a change beyond that which could be agreed through a Main Modification.

**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.**

**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?**

We refer the Inspector to our September 2016 representation. Here we highlighted that the council's reliance on historic land take-up as the only model which showed an increase in employment land to the end of the plan period. In contrast, the five other models tested within the Employment Land and Premises Study Update (2014) showed a reduction to the end of the plan period.

Despite showing a reduction through the modelling, and experiencing a historic take-up figure of 0.99ha per annum since 2001, the Council has proceeded to calculate its employment land using a higher 2.7ha per annum average. The reduction from 2.7ha to 0.99ha suggests that there is a potential downward trend of take-up across Fylde, with important implications for land requirements

over the plan period.

Assuming the annual average requirement is in line with the lower take-up figure of 0.99ha per annum, the proposed revised allocation in the Local Plan of 62.0ha equates to over 62 years of employment land supply. This is a considerable supply of employment land, extending beyond the plan period.

The amount of employment land is therefore not justified or supported by robust and credible evidence.

Yours sincerely

A handwritten signature in black ink that reads "Daniel Jackson". The signature is written in a cursive style with a large initial 'D'.

Daniel Jackson