

Mr Tony Blackburn,  
Programme Officer,  
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Blackburn,  
Lancashire,  
BB2 7EB

13<sup>th</sup> March 2017

Dear Tony,

**Fylde Local Plan Publication Version: Public Consultation  
Consultee ID: 52**

The following letter is provided as a statement on behalf of Persimmon Homes Lancashire in relation to selected questions set out within the Inspectors Matters, Issues and Questions relating to the Fylde Local Plan Examination.

Issue Specific Comments:

**Matter 1 – Compliance with statutory procedures and legal matters**  
***Issue 1 – Has the Council met the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004?***

Inline with paragraphs 159 & 47 of the NPPF it is not considered, as it has not been appropriately evidenced that the Council has undertaken meaningful cooperation activities, in particular with the neighbouring authority of Wyre. As such therefore it is not evident that the inability of Wyre to meet their housing requirement has influenced the production of this plan in any way. The documentation to date simply proposes that an agreement will be reached. The documentation has not been updated to suggest that any such agreement has been reached or even attempted.

The housing market of the Fylde Coast is demonstrably indivisible by the arbitrary Local Authority Boundaries. Were that the case, the evidence base would not be able to be produced jointly. Where a HMA is across administrative boundaries, the NPPF is clear in its requirement (paragraphs 47 & 159).

It is evident in other areas that the Council have taken a more proactive approach (Blackpool and employment land), therefore this gap in the evidence of any cooperation appears highlighted.

It is appreciated that the differing timescales of the local authorities in the production of their Local Plans places complications on Fylde that are outside their control. However, it might be that a strategy could be drawn up for the event that Wyre can confirm their requirement in the near future. This could identify additional general areas and / or quantum(s) of land that Fylde would consider in the event that Wyre's unmet need is proven through their own examination.

Without amendments to the Plan / a strategy there is no way for Fylde proving that the housing needs of the Fylde Coast can be adequately accommodated.

**Has the requirement for appropriate assessment under the Habitats Regulation Assessment (HRA) been met? Is it clear how the HRA screening report has influenced the Plan?**

It is not clear how far the HRA undertaken on behalf of Fylde Local Council has considered the full in combination effect of the residential allocations on the nearby SPA. It comes to different conclusions than that of recently approved Appropriate Assessments (as required and approved by both Fylde and Natural England).

**Matter 2 – Objectively assessed housing and economic development needs**  
***Issue 3 - Is the identified objectively assessed housing need (OAHN) soundly based and supported by robust and credible evidence and is it consistent with national policy?***

Persimmon Homes have concerns that the impact of using the 2012, rather than the 2014 based Sub-National Household Projections has not been fully considered. The OAHN is not solely derived from the SNHP figures and therefore a comparison of the two datasets (and subsequent implications) cannot be considered complete when simplified to this same level.

It is not felt that it has been demonstrated that full consideration has been given to the role of an increased housing requirement in order (among other aspirations) to meet the affordable housing need. This has not been addressed by the Council to date.

It is also unclear how the final housing figure aligns with the Council's employment aspirations, rather than just a convenient median figure. This comment relates also to matter 3 below.

**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?***

The proposed figure will boost supply against current delivery rates. That is not recognising however, that recent delivery rates have been unacceptably low for over a decade.

A cursory glance through the Councils Five Year Trajectory as supplied in response to the Inspectors Initial Questions raises a number of concerns:

- Sites with outline planning are sometimes shown to commence delivery this coming year. Note should be taken of the average period for determination of applications in Fylde as this approach is not robust. It is even less realistic to assume this where the approval has been gained through the land owners directly or a promotional or strategic land company, as further marketing, legal negotiations and subsequent planning applications will all be required prior to commencement.
- At least one permission listed has expired, but is still shown for short term delivery.
- A couple of sites with permission (through applications and appeals) that are being marketed currently don't appear in the supply. What is the reasoning for this inconsistent approach?
- Now that the 2016-18 year has passed can the delivery numbers can be updated and a more informed trajectory drafted.
- To assume all sites above 300 units will be developed by 2 developers is unsound. Persimmon Homes will develop the former Pontins site through a single outlet and numbers are expected to be nearer 45 dwellings per year. Incidentally the dwelling numbers and completions are incorrect.

It is considered that with appropriate modifications and perhaps discussions with developers and applicants that the plan can provide for both the 5 year and 6-10 year requirements.

Yours Sincerely,



Rachael Graham  
Senior Planner MRTPI  
Persimmon Homes Lancashire