

Fylde Council Local Plan to 2032 Examination Response to the Inspector's Matters, Issues and Questions (Stage 1 Hearing Sessions)

To: Tony Blackburn, Programme Officer

Date: Monday 13th March 2017

1. The Lancashire Branch of the Campaign to Protect Rural England (CPRE Lancashire) and its CPRE Fylde District Group hope the Inspector, Mrs Yvonne Wright, will make necessary modifications to improve the plan with regard to countryside protection and enhancement to enable Fylde Council to adopt an up-to-date local plan as soon as possible to steer sustainable development.
2. CPRE agrees Fylde Council must plan for enough employment land space over the plan period. The Minority Report, 2014 shows the assumptions behind the employment land forecasts are flawed. Realism needs applying to the employment figures to be more in line with the Experian employment-led scenarios, and to accord with policies set out in the National Planning Policy Framework and Planning Practice Guidance. Global economic uncertainties, such as Brexit mean high growth is highly unlikely in the next decade and this should be reflected in future scenario assumptions, or at the very least a sensible approach to the phasing of sites, so greenfield sites come forward later or after the plan period. Land that has no reasonable prospect of coming forward for employment should be considered for other land uses, namely housing.
3. CPRE has also campaigned to have a realistic number of homes developed to respond to local needs. We are therefore pleased to see the Inspector has raised important questions concerning the Objectively Assessed Need (OAN), housing requirement and the Five Year Housing Land Supply (5YHLS) and affordable housing.
4. Underpinning this 5YHLS is the housing requirement, which is in turn is derived from the OAN. Any excess in the OAN will have the impact of setting up Fylde Council to fail, as it can only process planning applications, and it cannot actually complete houses and this is the measure by which its performance will be assessed. The Housing White Paper states in future where an authority does not achieve 85% of its local plan targets a 'presumption in favour' will be applied which will lead to further off-local plan development.
5. The 2014-based households projection for Fylde over the Plan Period is a 15% increase from the 2012-based projection. (see Addendum 1)

6. In the opinion of CPRE the Housing Requirement Figure of 370 homes/year is based on an objectively assessed need calculation based on unrealistic scenarios leading to an unreasonably high figure. We agree with the following caveats in the Fylde Housing Requirement Paper suggesting the figure could be too high (Referencing sections in the 2016 Paper):
- Ability of the development industry to achieve the target (125.)
 - Downward revision of assumed build rates for deliverable homes (125.)
 - Large number of commitments (permissions) not being taken up (122.)
 - Shortfall in completions since the start of the Plan Period which ‘continue to be low’ (130.)
 - Workers for land in Fylde (14Ha) for Blackpool’s employment needs need not be accommodated in Fylde (138.)
 - The Preston Western Distributor road will make it much easier for workers to commute into Fylde (139.)
 - It is increasingly unlikely that [these] new workers will choose to live in the Council’s area (140.)
 - Completions are not increasing at the same rate as commitments (145.)
 - 370 homes/year is a substantial uplift (56%) from the 2012-based Sub-National Household Projection for Fylde, the ‘starting point’ projection. (154.)
 - 370 homes/year represents a high level of delivery in relation to that achieved even before the recession. (159.)
7. Taking into account the perceived capacity of the industry and market signals reflected in the shortfall in take up of permissions and completions against the proposed Housing Requirement (see below), CPRE suggests the realistic achievable housing requirement for Fylde ought to be circa. 250 homes/year.

Relevant figures

Average new homes built in the last 13 years:	210 homes/year	Fylde HLAS (*)
Average new homes from start of Local Plan (5 years):	210 homes/year	Table below
2012-based households projection for Fylde for Plan Period:	225 homes/year	Addendum 1
2014-based households projection for Fylde for Plan Period:	259 homes/year	“
The Council’s proposed Housing Requirement Figure:	370 homes/year	
CPRE suggested annual requirement:	~250 homes/year	

Shortfall in housing completions against the Housing Requirement:

Year	2011/12	2012/13	2013/14	2014/15	2015/16	Total
Completions	141	162	234	207	304	1,048
Requirement	370	370	370	370	370	1,850
Shortfall	-229	-208	-136	-163	-66	802

* Fylde Council Housing Land Availability Schedule, 31st March 2016.

8. Below is a link to a Blackpool Gazette story dated 11 March 2017 that highlights how Kensington Developments is seeking to drastically reduce the amount of properties it builds citing drainage and ‘market conditions’. The site is in Blackpool a neighbouring area to Fylde, and we think the developer claiming an over-supply of houses nearby is relevant to the housing requirement in Fylde. Kensington Developments is also involved in the 1,150 home Queensway site in Fylde.

9. The 5YHLS rule of the National Planning Policy Framework has had a brutal application in Fylde, and elsewhere in the country, with a considerable amount of farmland never intended for development allowed against local wishes, even that assessed as best and most versatile. For example, the settlements of Wrea Green and Warton have been swamped with a scale of new development that will significantly impact on local character, and will harm the environment.
10. Inconsistency is evident in the way Fylde Council has calculated its housing land supply. For local plan purpose the Liverpool approach (shortfall recovered over the lifetime of the local plan) is used, whereas for the determination of planning applications and appeals it has used the Sedgefield approach (shortfall recovered over the first five years of the local plan). This matter must be resolved, as we believe this inconsistency is threatening more countryside loss, and is certainly not enabling 'sustainable' development.
11. The provision of affordable housing is most important and CPRE is aware of shortages in some of Fylde's rural places. We believe on-site provision should be mandatory. It is the availability of land to build upon that often constrains the supply of affordable homes. We have also witnessed developers seeking to negotiate out of agreed affordable housing contributions based on viability, which means new development only comprise larger and more expensive family and executive homes and does not responding to identified need and this must not be allowed in the future.
12. CPRE promotes 'Smart Growth', which is based on sustainable development principles. Like Government and in accordance with the National Planning Policy Framework we believe developers ought to be encouraged to focus on available previously developed (brownfield) land in advance of bulldozing countryside.
13. Land allocated should be in accessible locations, to promote walking and cycling, and connected by good public transport services, and other needed community infrastructure such as doctors and schools. Developer contributions must be agreed if public transport or other vital infrastructure is deficient.
14. We believe farmland ought to be targeted as a last resort for development, particularly high grade land (BMV Grades 1-3a), which is a local asset. The Local Plan could state development is prohibited on Grade 1 farmland.

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Addendum 1: DCLG Sub-National Households Projection Data for Fylde

2012-based SNHP and 2014-based SNHP from Table 406 Fylde - Area code E07000119

www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections

2012-based SNHP			2014-based SNHP		
Year	Households	New in year	Year	Households	New in year
1991	30,410		1991	30,410	
1992	30,668	258	1992	30,668	258
1993	30,962	294	1993	30,962	294
1994	31,172	210	1994	31,172	210
1995	31,421	249	1995	31,421	249
1996	31,665	244	1996	31,665	244
1997	31,688	23	1997	31,688	23
1998	31,978	290	1998	31,978	290
1999	31,959	-19	1999	31,959	-19
2000	32,319	360	2000	32,319	360
2001	32,464	145	2001	32,464	145
2002	32,793	329	2002	32,794	330
2003	33,287	494	2003	33,289	495
2004	33,643	356	2004	33,646	357
2005	33,845	202	2005	33,849	203
2006	33,928	83	2006	33,932	83
2007	34,233	305	2007	34,237	305
2008	34,358	125	2008	34,363	126
2009	34,557	199	2009	34,561	198
2010	34,705	148	2010	34,710	149
2011	35,025	320	2011	35,031	321
2012	35,130	105	2012	35,134	103
2013	35,335	205	2013	35,439	305
2014	35,545	210	2014	35,823	384
2015	35,776	231	2015	36,067	244
2016	36,021	245	2016	36,338	271
2017	36,271	250	2017	36,628	290
2018	36,520	249	2018	36,908	280
2019	36,758	238	2019	37,181	273
2020	37,000	242	2020	37,454	273
2021	37,241	241	2021	37,719	265
2022	37,483	242	2022	37,989	270
2023	37,719	236	2023	38,248	259
2024	37,943	224	2024	38,500	252
2025	38,174	231	2025	38,757	257
2026	38,404	230	2026	39,011	254
2027	38,621	217	2027	39,256	245
2028	38,834	213	2028	39,493	237
2029	39,034	200	2029	39,714	221
2030	39,251	217	2030	39,953	239
2031	39,465	214	2031	40,190	237

2032	39,662	197	2032	40,407	217
2033	39,863	201	2033	40,628	221
2034	40,051	188	2034	40,827	199
2035	40,239	188	2035	41,028	201
2036	40,423	184	2036	41,229	201
2037	40,602	179	2037	41,422	193
			2038	41,599	177
			2039	41,756	157
	Total:	10,192		Total:	11,346
	Average:	222		Average:	236

Plan Period 2011-2032	2012-SNHP	2014-SNHP
Total at end 2010	34,705	34,710
Total at end 2032	39,662	40,407
Total in Plan Period	4,957	5,697
Average over 22 years	225 / Year	259 / Year

The 2014-based households projection for Fylde over the Plan Period is a 15% increase from the 2012-based projection.