

Barton Willmore on behalf of Story Homes Ltd
Examination into the Fylde Council Local Plan to 2032
Matter 3
Representation ID: 058

Matter 3 – Housing and employment requirements

1. The following Hearing Statement is made for and on behalf of Story Homes. This Statement responds to selected questions set out within Matter 3 of the Inspector's *Matters, Issues and Question*.
2. The following responses should be read in conjunction with our comments to the Publication version of the Local Plan, dated September 2016. We have also expressed a desire to attend the Examination Hearing Sessions in relation to this Matter.

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?

3. The Council's proposed housing requirement of 370 dwellings per annum reflects the proposed demographic based migration-led scenario OAHN outlined within paragraph 5.26 of the Addendum 2 SHMA¹. This figure represents a comparative substantial uplift, over 50% from the 2012 – based SNHP starting point projections of household growth and need. However, as stated within paragraph 5.26 of the Addendum 2 SHMA (footnote 1) this figure fails to make a specific allowance for improvements to unemployment rates in the authority, and would essentially support a stabilisation of the levels of employment in Fylde.
4. The Council's proposed housing requirement is supported by evidence contained within the SHMA's and its subsequent Addendums² and the Housing Requirement Paper³, however, we do not believe this evidence base to be robust and it therefore follows that the housing requirement is not soundly based.

¹ Document Ref: ED023

² Document Ref: ED021, ED022, ED023

³ Document Ref: ED017

5. We refer the Inspector to our comments in relation to Matters 1 and 2. In summary, we do consider the evidence base supporting the proposed housing requirement is robust for the following reasons:

- The figure is based on an OAHN that utilises 2012-based SNHP (221 dwellings per annum) rather than the latest available 2014-based SNHP (256 dwellings per annum), a difference of 735 dwelling over the plan period. To ensure the Local Plan is effective and up-to-date, the Council should use 2014-based SNHP in line with guidance contained within the PPG;
- The figure fails to provide a sufficient uplift to take account of worsening trends in affordability and the housing shortfall of 764 dwellings from 2003 to 2011 against the revoked RSS target;
- The figure does not provide a sufficient uplift to meet the predicted increase in the needs of the elderly population in Fylde, predicted to increase from 21,460 in 2011 to 30,311 in 2030, an increase on 41.2%;
- The proposed housing requirement is based on an OAHN that would see the stabilisation of levels of employment and this is at odds with the Council's economic growth strategy set out within Publication Draft Local Plan. The Council is reliant on workers commuting into Fylde from neighbouring authorities, however, this approach is unsustainable and the Council should be planning for sustainable growth within their own boundaries rather than increasing commuter patterns; and
- The proposed housing requirement fails to take into account the quantum of housing it is willing to provide to help Wyre meet its unmet housing needs. This is an issues needs to be considered now given it is unlikely other authorities within the HMA will be able to meet this need.

6. In conclusion we do not consider the proposed housing requirement to be justified in accordance with paragraph 182 of the NPPF. We reserve the right to provide further comments should the Council produce additional evidence to address these concerns.

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

7. For the reasons set out above, we consider the proposed housing requirement of 370 dwellings per annum would fail to meet the OAHN for market and affordable housing in the HMA in accordance with policy 47 of the NPPF and paragraph 182 of the NPPF.

8. We suggest that an economic led growth requirement of **440 to 450 dwellings per annum** represents the correct OAHN for Fylde based upon the need to deliver sustainable

economic and housing development growth. An uplift will also help improve the trend in worsening market signals including affordability and lack of supply and provide further assistance in delivering much needed homes for the increasing older population.

c. Will it significantly boost housing supply?

9. Paragraph 47 of the NPPF requires local planning authorities to boost significantly the supply of housing. Paragraph 121 of the Housing Requirement Paper⁴ states that Fylde has, on average, delivered approximately 210 net dwellings per annum from 2003 – 2016. It would therefore appear the proposed housing requirement of 370 dwellings per annum would significantly boost the housing supply compared to past average delivery trends. Notwithstanding this, there has been considerable variation in these figures which can be related to the housing “moratorium” and the impacts of the recession. This average level of delivery was also significantly below the housing requirement for Fylde set out within the now revoked Regional Spatial Strategy (RSS) (306 dwellings per annum).

10. Furthermore, to boost significantly the supply of housing, paragraph 47 requires local planning authorities to:

"use their evidence base to ensure that their Local Plan the full, objectively assessed needs for market and affordable housing in the housing market area..."

11. For the reasons set out above we do not consider the Council’s evidence base to be robust and therefore the proposed housing requirement of 370 dwellings per annum would fail to meet the OAHN for market and affordable housing in the HMA. Subsequently we do not consider the proposed housing requirement will provide a significant boost the housing supply within the Borough in accordance with the NPPF.

12. Our Client remains of the view to ‘boost significantly’ the supply of housing, housing growth should be based on achieving economic growth in Fylde. This would require a housing requirement of **440 to 450 dwellings per annum.**

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:

⁴ Document Ref: ED017

a. a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption;

13. Paragraph 47 of the NPPF states to boost significant the supply of housing, local planning authorities should:

"Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;"

Five Year Housing Requirement

14. The basis for the Council's housing land supply is contained within Appendix 2 of the Publication Local Plan⁵, however, it is unclear from this evidence whether the proposed supply is sufficient to meet the Council's five year requirement including the appropriate buffer.
15. The Inspectors Initial Questions⁶ asked the Council to provide a summary table bringing together the evidence to show the five year housing land supply (including the buffer) at the point of adoption. The Council's response⁷ includes a table that sets out the delivery of sites over the first five years of the Local Plan following adoption (assuming the Local Plan will be adopted in 2017), however, it does not include a table detailing their calculation for their five year housing land supply requirement. It is therefore, difficult to understand the approach taken by the Council in calculating their five year housing land supply.
16. Notwithstanding this, the Council's response to Question 6 of the Inspectors Initial Questions (see footnote 4) refers to the annualised five year requirement being 420 over the remainder of the plan period, assuming the Local Plan is adopted in 2017. This figure includes the shortfall from the beginning of the plan period (802 dwellings⁸) being

⁵ Document Ref: SD001

⁶ Document Ref: EL1.001a

⁷ Document Ref: EL1.001b

⁸ Document Ref: SD001, Appendix 2

addressed over the remaining 15 years of the plan period. This approach is otherwise known as the 'Liverpool' method. We do not agree with this approach.

17. A shortfall of housing means that demand is unmet. Therefore the shortfall needs to be addressed as quickly as possible within the pool of land supply for development in order to meet the NPPF requirement to boost significantly the supply of housing.

18. PPG⁹ also states:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate'."

19. This approach clearly favours the shortfall being made up within the next 5 years, known as the 'Sedgefield' approach. This must be considered to be a preferable approach whereby the unmet demand arising from a shortfall is not left to be dealt with until the end of the plan period.

20. The approach taken by the Council in their response to the Inspectors Initial Questions¹⁰ also contradicts the approach taken by the Council within their Five Year Housing Land Supply Statement (March, 2016) (5YHLSS) which endorses the 'Sedgefield' approach. Table 1 is an extract from that Statement that compares the five year housing requirement for the proposed housing requirement of 370 dwellings per annum against our proposed housing requirement of 440 dwellings

21. Table 1 below sets out the Council's five year housing requirement, utilising the 'Sedgefield' method, as endorsed within the Council's latest Five Year Housing Land Supply Statement (March, 2016).

Table 1: Calculation of the Councils Housing Requirement 2016 – 2021

	The Council's proposed Housing Requirement	Story Homes proposed housing requirement
Five Year Housing Requirement at 31st March 2016	No. of Homes	No. of Homes
a. Annual Housing Requirement	370	440

⁹ Paragraph 035 Reference ID: 3-035-20140306, PPG

¹⁰ Document Ref: EL1.001b

b. 5 year housing requirement and shortfall (a. x 5 + 801)	2,651	3,001
c. Adjusted 5 year housing requirement, including shortfall and 20% buffer (b. + 20% buffer)	3,181	3,601
d. Adjusted annual housing requirement for 0-5 year period (c. / 5)	636	720

22. As shown in Table 1 above the Council’s adjusted five year housing requirement is 3,181 dwellings (636 dpa) utilising the Council’s proposed housing requirement of 370 dwellings per annum and 3,601 dwellings (720 dpa) utilising the revised housing requirement of 440 dwellings per annum.

23. This is significantly higher than the proposed five year housing requirement of 2,520 dwelling (504 dpa) stated within Council’s responses to the Inspector’s Initial Questions (see footnote 11). The Council should be consistent in their approach to five year housing supply and should instead adopted the ‘Sedgefield’ approach and utilise 3,181 dwellings as their five year requirement unless there is robust evidence to suggest otherwise e.g. environmental constraints affecting the supply of land.

Housing Land Supply

24. The Appendix to the Council’s response to the Inspectors Initial Questions (see footnote 10) is an extract from the Council’s Housing Trajectory set out within Appendix 2 of the Publication Local Plan.¹¹ The Trajectory identifies a five year supply of deliverable housing sites from 2017-2022 as being equivalent to 3,471 dwellings. Utilising the ‘Sedgefield’ approach (3,181 dwellings outlined in the 5YHLSS), the supply will, therefore, be in surplus by 290 dwelling, however, utilising the revised housing requirement of 440 dwellings per annum the five year supply will see a shortfall of 130 dwellings and the Council would be unable to demonstrate a five year supply.

25. Notwithstanding this, we do not consider the supply figure set out within the Council’s response to the Inspectors Initial Questions to be robust and based upon realistic assumptions regarding deliverability, lead in times and rates of development in accordance with footnote 11 of the NPPF, and therefore, we question the Council’s ability to be able to demonstrate a five year supply of housing land. We set out our concerns below.

¹¹ Document Ref: SD01

Standardised Build out Rates

26. The Housing Trajectory breaks down the housing supply across the 4 Strategic Locations, followed by the Non-Strategic Locations for development and Allowances and Unallocated sites, with a standard methodology for build out rates and phasing.
27. In terms of phasing, the Council’s lead in times for sites with planning permission are set out within the Council’s Five Year Housing Land Supply Statement. As this is not submitted as evidence to the Local Plan Examination, this is repeated in the Table below.

Full planning permission, with signed Section 106	1-5 years
Full planning permission, awaiting signing of Section 106	2-5 years
Change of use, awaiting signing of Section 106	2-5 years
Outline planning permission, with signed Section 106	2-5 years
Outline planning permission, awaiting signing of Section 106	3-5 years
Full planning application received and proposed allocation in emerging Local Plan	3-5 years
Outline planning application received and proposed allocation in emerging Local Plan	4-5 years

28. We would broadly agree with the Councils general approach to lead in times for sites with planning permission, however, where more refined information is available this should be considered more favourable.
29. In response to Question 6 of the Inspector’s Initial Questions¹² the Council confirm that they have adopted a standardised build-out rate across all sites, which informs the projected delivery at each site should in the plan trajectory. The standardised rate assumes that 15 homes will be built in the first year and 30 homes in subsequent years. If the site has a capacity of more than 300 homes then it assumes that there will be two developers and the output will be doubled.
30. We recognise the logic in the approach to applying standardised build out rates, however, given the Council is reliant on Strategic Locations delivering over 80% of its housing growth, where an application has been approved and more refined information can be obtained in relation to each site from the owners or developers, actual feedback should be considered to be more favourable. We set out our concerns regarding the deliverability of sites below.
31. We also disagree with the standard delivery rates applied to sites over 300 dwellings. We draw the Inspector’s attention to the proposed delivery rates for the Queensway (Site Ref: HSS1) and Coastal Dunes (Site Ref: HSS4) sites where the Council has applied this

¹² Document Ref: EL1.001b

assumption. Each of these sites is being developed by a single developer and the Council has provided no evidence to the contrary, therefore, we consider the proposed delivery of 60 dwellings on each of these sites by one developer to be wholly unrealistic and the supply assessment should be adjusted accordingly.

Deliverability

32. We have previously raised our concerns regarding the deliverability of a number of allocations within Publication Draft Local Plan. Sites have been included in the five year supply of housing which upon closer examination are not considered to be deliverable in the anticipated timeframe, thus casting further doubt over the reliability of the housing trajectory and Strategic Site Assessments¹³. We have undertaken a review of these sites as part of our Regulation 20 Representations (extract included at Appendix 1 of this Statement) and I would particularly draw your attention to our comments in relation to the following sites:

- HSS1 – Queensway;
- HSS4 – Coastal Dunes;
- MUS1 – Cropper Road East;
- HSS5 – Cropper Road West;
- HS21 – Land to the rear of 11-63 Westgate Road;
- HSS2 – Blackfield End Farm;
- HS27 – Oaklands Caravan Park; and
- HS28 – Sunnybank Mill.

33. The variety of concerns identified regarding the above sites cast significant doubt over the five year housing supply and the assumptions made. We are unaware of any available to robustly demonstrate the proposed delivery rates of each site, therefore, we consider the delivery of 3,471 dwellings within five year supply to be wholly unrealistic and it is therefore imperative that the Council re-examines its five year housing land supply to ensure the anticipated delivery of dwellings is reliable.

Windfalls

34. The Five Year Trajectory appended to the Council's response to the Inspectors Initial Questions¹⁴ states that 386 dwellings will be delivered from allowances and unallocated sites, including windfall. We recognise the potential of this supply, however, we are

¹³ Document Ref: ED028a – ED028g

¹⁴ Document Ref: EL1.001b

concerned that the Council has provided insufficient evidence to justify this allowance as a source of supply.

35. The NPPF indicates that an allowance may be made for windfall sites where there is compelling evidence that they will continue to provide a reliable source of supply. The Council has included 40 dwellings within their five year supply to be delivered in the final year 2021-2022. The Strategic Housing Land Availability Assessment (SHLAA)¹⁵ identifies a windfall allowance of between 14 dwellings per annum to 35 dwellings per annum if conversion are included. As such, an allowance of 40 dwellings appears unrealistically high.

36. The five year supply also makes an allowance for bringing back 40 long-term empty dwellings PPG¹⁶ states:

"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 (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans)."

37. We are unaware of any evidence available to robustly demonstrate that this source of supply would not include any double counting. We therefore recommend that 40 dwellings be removed from the supply of housing.

38. It is also unclear whether the dwellings included in the five year housing trajectory as 'small sites commitments and minded to approve' have had a discount applied to them to deal with non-implementation. We request further clarification on this matter and an appropriate discount be applied based upon previous rates of non-implementation.

Summary

39. In summary, given our concerns regarding the Council's approach to calculating the five year housing requirement, the assumed standardised delivery rates, our concerns regarding the deliverability of a number of allocated sites and the assumed number of

¹⁵ Document Ref: ED025

¹⁶ Paragraph: 039 Reference ID: 3-039-20140306, PPG

deliverable of windfall sites we do not consider the identified supply of sites will be sufficient to meet the housing requirement for five years from the point of adoption.

40. Furthermore, we have also been clear within our response to Question 23 that an uplift is required to the proposed housing requirement to address market signals and to address the Council's economic growth strategy. When applying the revised requirement of 440 dwellings per annum to the five year housing requirement of 3,601 dwellings, the identified supply of 3,471 dwellings will see a shortfall of 130 dwellings and the Council would be unable to demonstrate a five year supply.
41. Taking all the above into account, the Council should seek to allocate additional sites within the Local Plan which are suitable, available and deliverable and will help to achieve the borough's objectively assessed housing need. This should include smaller sites within sustainable locations that are deliverable in the short term.

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

42. Paragraph 47 states to boost significantly the supply of housing, local planning authorities should:

"identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11 -15;"

43. The Housing Trajectory at Appendix 2 of the Publication Draft Local Plan identifies specific sites within each of the 'Strategic Locations' - Lytham St. Annes, the Fylde Blackpool Periphery, Warton and Kirkham and Wesham, 'Non-Strategic Sites' and Windfall sites that will be delivered over the plan period.
44. We have a number of concerns in relation to the overall housing land supply and the assumptions made in relation to windfall sites. We would draw your attention to our comments made in our Regulation 20 Representations, included at Appendix 1 of this Statement.
45. We are unaware of any further evidence published by the Council to allay the concerns raised and as such they remain valid. We note the Council did publish a series of Strategic Site Assessment¹⁷ documents that sought to justify the proposed housing allocations in

¹⁷ Document Ref: ED028c - ED028g

each of the 'Strategic Locations' and rural areas, however, these assessments were published in 2015 prior to the submission of Regulation 20 Representations and therefore out-of-date.

46. In summary, whilst the Council has identified specific sites for growth for years 6-10 from the point of adoption we do not believe these are deliverable for the reasons set out within our Regulation 20 Representations (Appendix 1) and for the same reasons set out in our response to part a. of this Question.

47. We consider the Council must look to allocation additional sites to ensure if there is failure to deliver, an ongoing shortfall is avoided. This includes the allocation of sites within sustainable rural villages. We reserve the right to provide further comments on specific land allocations during the course of the Examination if further evidence becomes available.

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?

48. We contend that the supply identified within Appendix 2 of the Publication Draft Local Plan would be insufficient to provide five years' worth of housing against the proposed housing requirement and revised housing requirement of 440 dpa and we also we have concerns regarding the deliverability of sites identified to be deliverable in years 6 – 10.

49. As shown within Table 2 of the Publication Draft Local Plan, the Council has identified enough land to accommodate a supply of 7,891 dwellings, 121 dwellings above the proposed housing requirement. Given the uncertain status of many of the sources of supply, we are concerned that this is not an adequate buffer to ensure that the housing requirement is met and to ensure the plans provides for sufficient flexibility to adapt to rapid change as required by paragraph 14 of the NPPF.

50. The current lack of flexibility is also concerning given that the Housing Requirement Paper¹⁸ clearly identifies that many commitments within Fylde are not progressing to completion.

51. We recommend greater flexibility be introduced into the plan through additional allocations to provide a sufficient buffer (20%) if sites are not delivered and this may also assist in addressing some of the unmet housing needs from Wyre. This includes the allocation of

¹⁸ Document Ref: ED017

smaller sites within sustainable rural villages such as Elswick that can come forward earlier in the plan period.

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

52. We do not wish to comment on this issue.

APPENDIX 1

**EXTRACT FROM REGULATION 20 REPRESENTATIONS
ASSESSMENT OF STRATEGIC LOCATIONS FOR DEVELOPMENT AND SUPPLY
ASSUMPTIONS (SECTION 4 AND 5)**

EXTRACT FROM REGULATION 20 REPRESENTATIONS, STORY HOMES
ASSESSMENT OF STRATEGIC LOCATIONS FOR DEVELOPMENT (SECTION 5)

Strategic Locations for Development

- 5.1 Policies SL1 to SL4 of the Plan identifies four 'Strategic Locations' for development across Fylde. These include Lytham St. Annes, the Fylde-Blackpool Periphery, Warton and Kirkham and Wesham.
- 5.2 Our Client has concerns over assumptions made by the Council in terms of expected delivery rates and whether the larger strategic sites, Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) will deliver the proposed number of dwellings within the plan period given the significant amount of upfront investment and infrastructure required.
- 5.3 Our Client wishes to comment upon the proposed allocated sites in Chapter 7 of the Publication Draft Document as follows. We reserve the right to revise and update these comments as and when necessary in the future.
- 5.4 Such sites may be subject to multiple landownership, and/or require a significant amount of upfront investment to enable their delivery (such as new road infrastructure, utilities and education provision). Lead-in times for the delivery of these sites can be significantly prolonged, and as a result cannot be reasonably expected to contribute to short term supply needs. A detailed critique of the deliverability of each site within the four Strategic Locations is made within Section 5 of this report.

Policy SL1: Lytham St. Annes Strategic Location for Development

HSS1 – Queensway, St. Annes

- 5.5 Site HSS1 is situated to the north of St.Annes, between Heyhouses Way and North House Lane, and Kensington Developments has been granted outline planning permission for residential development of up to 1,050 dwellings in 29th April 2009 (App Ref: 08/0058).
- 5.6 Kensington Developments were subsequently approved permission for reserved matters in April 2015 for 110 dwellings (App Ref: 13/0257). A further reserved matters application was submitted by Kensington Developments in June 2015 for 927 dwellings (App Ref: 15/400). When the Revised Preferred Options document consultation took place in December 2015 this application was pending a decision, this remains the case. No other applications have been submitted since December 2015.

- 5.7 The Housing Trajectory at Appendix 2 of the Publication Draft Document assumes that this site will deliver 30 dwellings in 2016 and 60 dwellings per annum between 2017 and 2032. Our Client has previously raised concerns in relation to the delivery assumptions being applied by the Council relating to the delivery rates of this site.
- 5.8 It remains our understanding that Kensington Development's (the applicant for the outline and reserved matters applications), intends to develop this whole site alone. The Council has not provided any evidence as part of the Local Plan to suggest to the contrary. As a developer within Fylde, our Client considers the consistent delivery of 60 dwellings per annum on this site to be unrealistic for one developer, in reality it is more likely to be 30 dwellings per annum at best.
- 5.9 The delivery of this site is also reliant on the implementation of the new M55 Junction 4/Heyhouses Link Road. The Infrastructure Delivery Plan (August, 2016) confirms the Council has now secured funding for the new link road from Section 106 Contributions, LEP Local Growth Fund and Highways England and is expected to be delivered by 2019.
- 5.10 Notwithstanding this, the first phase of development for 110 dwellings is reliant upon the delivery of the roundabout at the junction of Queensway and Kilnhouse Lane to obtain access. We understand a temporary access will be available for preloading of the site to take place, however, as work is yet to begin on the roundabout, it is highly unlikely the site will deliver any dwellings within the next two years. Optimistically, our Client expects that this site will not deliver dwellings until at least 2019 once a suitable access into the site can be achieved.
- 5.11 In summary, our Client considers it unlikely that the full 1,150 dwellings will be delivered within this plan period. At a more realistic delivery rate of 30 dwellings per annum with dwellings being delivered on site from 2019, it is expected the site will deliver at best 390 dwellings over the plan period leaving a shortfall of 540 dwellings. To ensure the full objectively assessed housing of this plan period are met in full there will be the need for further sites to be allocated.

MUS4 – Heyhouses Lane, St. Annes

- 5.12 Site MUS4 is a mixed use development site located off Heyhouses Lane and is allocated for 322 dwellings. It was previously referenced as HSS2 as part of the Revised Preferred Options consultation and was allocated for 250 dwellings. Two thirds of the site benefits from planning permission for a supermarket, public house and 162 dwellings. This development commenced in 2014 and is expected to be complete in 2020.
- 5.13 The remaining part of the site is occupied by Electronic Data Systems (EDS). Our Client previously objected to the allocation of this part of the site within the Local Plan as the Council had failed to provide any evidence that the site was available. Since then, an outline planning application has been submitted on this part of the site for the development of up to 160 dwellings (App Ref:

15/0787). Our Client therefore accepts that this site is now available and will contribute towards Fylde's housing requirement within the plan period.

HSS3 – Lytham Quays, Lytham

- 5.14 Site HSS3 is a residential site on the eastern boundary of Lytham and has planning permission for 120 dwellings. Development commenced in 2007/2008 and is now complete. Our Client accepts that the dwellings constructed from 2011 onwards will contribute towards Fylde's housing requirement within the plan period.

HS1 – Queen Mary School, Clifton Drive South, St. Annes

- 5.15 Site HS1 was not previously allocated within the Revised Preferred Options document; however, development commenced on this site in 2011 and the 41 dwellings are due to be completed by 2017. Our Client does not contest the deliverability of this site within the plan period.

Other Site Allocated with Lytham St. Annes

- 5.16 Our Client does not wish to make comments in relation to the remaining sites allocated for development as part of Policy SL1.

Policy SL2 – The Fylde-Blackpool Periphery Strategic Location for Development

HSS4 – Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor

- 5.17 Site HSS4 is situated to the west of Blackpool Airport in the Blackpool Airport Corridor and was previously used as a holiday park. The site has planning permission for 351 dwellings.
- 5.18 Our Client is aware that construction has commenced on site and the development is being actively marketed by Persimmon Homes. Our Client accepts that there is no evidence why this site will be undeliverable within the plan period, however, our Client considers the consistent delivery of 60 dwellings per annum from 2016 - 2021 on this site is unrealistic for one developer. Only 12 plots have been registered on the site since construction began in 2015, based on passed delivery rates the site is more likely to be 20-25 dwellings per annum at best.

MUS1 – Cropper Road East, Whitehills

- 5.19 Site MUS1 is a mixed use development site located to the east of Cropper Road, Whitehills, expected to deliver 451 dwellings over the plan period.
- 5.20 Wainhomes has commenced development of 146 homes on part of this site and this is expected to be completed by 2022 (App Ref: 12/0717).

- 5.21 There are three other outline applications on the site for a mix of employment and residential use, for 200, 80 and 26 dwellings respectively (App Ref: 15/0114, 15/0472 and 13/0753). The applications for 80 and 26 dwellings have been approved and the application for 200 dwellings is outstanding.
- 5.22 Whilst the site benefits from planning permission, the site is isolated from settlements and services. The delivery of the remaining part site is reliant on improvements to local infrastructure, which has the potential to stall development if this is not in place. This will result in patterns of unsustainable development.
- 5.23 Furthermore, one of the outline applications forms the second phase of the Wainhomes site, therefore, this is unlikely to start delivering until the first site is complete. The market competition of other sites coming forward within the Fylde-Blackpool Periphery will also serve to dampen delivery rates. It is highly likely that a high proportion of dwellings will not come forward until late in the plan period, the delivery rates should therefore be adjusted accordingly.

MUS2 – Whyndyke Farm, Preston New Road, Whitehills

- 5.24 Site MUS2 is a mixed use development site situated to the east of Preston New Road (A583). The Council is minded to grant outline planning permission for 1,310 dwellings (subject to signing a Section 106 Agreement) on the site; including the provision of two new local neighbouring centres, a primary school and a health centre, in addition to improvement to Junction 4 of the M55.
- 5.25 The delivery of the site is dependent upon the implementation of significant new infrastructure. The Infrastructure Delivery Plan (August, 2016) confirms that the funding for this infrastructure is dependent upon Section 106 Contributions. Since the Council drafted their Decision Notice in July 2015, no Section 106 Agreement has been signed, there is therefore no committed capital to implement the infrastructure required. The Council has provided no indication of timescale for when the Section 106 Agreement is likely to be signed. Our Client is therefore concerned without this commitment in place there is no certainty that this site is deliverable.
- 5.26 Our Client also remains concerned that the Council has failed to fully consider the timescales required to implement key infrastructure to deliver this site, which could potentially slow down development.
- 5.27 The Housing Trajectory at Appendix 2 of the Publication Draft Document expects the site to start delivering 30 dwellings in 2018 – 2019 and 60 dwellings per annum between 2019 and 2032, this is reduced from the proposed delivery of 100 – 110 dwellings per annum in the Revised Preferred Options document.

- 5.28 Our Client accepts that the scale of the site means it is likely to be delivered by multiple housebuilders, therefore, a conservative delivery rate of 60 dwellings per annum is more appropriate than that proposed in the Revised Preferred Options document. Nonetheless, without specific timescales or committed funding it is unclear whether the proposed delivery rates are realistic. Until such time the Council can provide evidence that the funding for key infrastructure can be secured, our Client cannot be sure that this site will be deliverable over the plan period.

HSS5 – Cropper Road West, Whitehills

- 5.29 Site HSS5 is situated west of Cropper Road, Whitehills and is expected to deliver 442 dwellings over the plan period, with delivery expected to start in 2020.
- 5.30 Our Client remains of the view that this site is undeliverable within the plan period. Cropper Road is a narrow highway with no public footpath. Significant highway improvements would be required to Cropper Road to facilitate the development. The Council has failed to provide any evidence that this would be achievable.
- 5.31 The site is currently unavailable and within the ownership of multiple land owners who currently occupy the site. This has the potential to impact upon the lead in time of the site if one landowner is not willing to cooperate. No evidence has been provided that the entire site will be available for development in the long term.
- 5.32 As stated in the Strategic Sites Assessment Paper (2015) the development of this site is also dependent on the provision of relevant facilities and services at Whyndyke Farm and improvements to Junction 4 of the M55 motorway, the timescales for which are currently unknown.
- 5.33 Furthermore, the market competition of other sites coming forward earlier in the plan period within the Fylde-Blackpool Periphery can serve to dampen delivery rates. Our Client therefore contests that this allocation should be removed from the Local Plan as it is potentially unsuitable, unavailable and undeliverable. To ensure the full objectively assessed housing of this plan period are met in full there will be the need for further sites to be allocated.

HSS6 – Land at Lytham St Annes Way, Whitehills

- 5.34 Site HSS6 is situated off Lytham St Annes Way and has planning permission for 150 dwellings. Our Client is aware that development has commenced and accepts that the Site will be deliverable within the plan period.

HS21 – Land to the rear of 11-63 Westgate Road, Squire Gate

- 5.35 Site HS21 was not previously allocated within the Revised Preferred Options document; however, the site is expected to deliver 70 dwellings over the plan period. An application was submitted in August 2012 for the development of 46 apartments and 26 houses (72 dwellings in total), however, this application was never determined. Subsequently, planning permission was approved in July 2016 for the development of 25 dwellings, therefore, 45 dwellings needs to removed from the overall supply figure.

Other Site Allocations within Fylde – Blackpool Periphery

- 5.36 Our Client does not wish to make comments in relation to Sites HS22 and HS23.

Policy SL3 Warton Strategic Location for Development

HSS2 – Blackfield End Farm, Church Road, Warton

- 5.37 Site HSS2 was not previously allocated within the Revised Preferred Options document; however, the site has since been granted outline planning permission at appeal by the Secretary of State in September 2015 for 360 dwellings which is why it is now proposed for allocation. The site is expected to deliver 15 dwellings in 2017 – 2018 and 2030 – 2031, and 30 dwellings per annum from 2018 – 2019 to 2029 – 2030.

- 5.38 Our Client is concerned that the delivery assumptions being applied by the Council relating to the delivery of this site are unrealistic. Whilst outline planning permission has been granted, the applicant (Hallam Land) are a strategic land company, they will need to dispose of the site to a housebuilder/developer, who will need to gain reserved matters approval, undertake site preparation works and implement the required infrastructure. From our Clients experience it is unlikely the site start being deliverable until at least 2019 at best. The site may therefore not be developed in full over the plan period.

HSS7 – Highgate Park, Lytham Road, Warton

- 5.39 Site HSS7 consists of the Former GEC Marconi Factory and adjacent land off Lytham Road in Warton. The Site has planning permission for 254 dwellings. Development commenced on site in 2014, with first completions in 2014/15. Our Client does not contest the deliverability of this site within the plan period.

HS24 – Riversleigh Farm, Warton

- 5.40 Site HS24 was not previously allocated within the Revised Preferred Options document; however, the site benefits from full planning permission for 82 dwellings which is why it is proposed for allocation. Prospect Housing commenced development on site in 2014, with first completions in 2014/15. Our Client does not contest the deliverability of this site within the plan period.

HS25 – Nine Acres Nursery, Harbour Lane Phase 1

- 5.41 Site HS25 was not previously allocated within the Revised Preferred Options document; however, development commenced on this site in 2013 and the 75 dwellings are due to be completed by 2017. Our Client does not contest the deliverability of this site within the plan period.

HS27 – Oaklands Caravan Park, 252 Lytham Road, Warton

- 5.42 Site HS27 was not previously allocated within the Revised Preferred Options document; however, there is currently a pending outline planning application for 53 dwellings (App Ref: 15/0194) on the site which is why it is now proposed for allocation.
- 5.43 Our Client notes that Lancashire County Council has objected to this application on the grounds that the proposed development will have a greater impact than the existing development, on the highway network in terms of highway safety, highway capacity and will lead to greater queue lengths at junctions on the A584. Our Client therefore considers that this site is undeliverable and should be removed as an allocation, until the highway issues have been successfully resolved.

Other Site Allocations within Warton

- 5.44 Our Client does not wish to make comments in relation to Site HS26.

Policy SL4 Kirkham and Wesham Strategic Location for Development

HSS8 – The Pastures, Fleetwood Road, Wesham

- 5.45 Site HSS8 is situated north of Wesham and planning permission has been granted for 264 dwellings on the site and is currently under construction. Our Client does not contest that this site will be delivered within the plan period.

HSS9 – Land north of Blackpool Road, Kirkham

- 5.46 Site HSS9 is bordered by the A583, A585 and the railway line to the west of Kirkham. Our Client was granted reserved matters for the development of 117 dwellings on part of this site. The site is under construction and our Client can confirm this will be delivered within the plan period.
- 5.47 Barratt Homes has planning consent for 180 dwellings on part of the site. The site is under construction and our Client does not contest that this site is deliverable within the plan period.
- 5.48 Morris Homes has a pending planning application for 291 dwellings on the northern part of the site. Our Client does not contest that this site is deliverable within the plan period.

HSS10 – Willowfields, Derby Road, Wesham

- 5.49 Development at site HSS10 commenced in 2008. The development is now complete; however, our Client questions whether all dwellings were delivered within the plan period or whether some dwellings were delivered before. The Housing Trajectory states that 71 dwellings were delivered in 2011-2012, the Council should not include dwellings that were completed before the start of the plan period, if dwellings were completed before 2011 they should be removed from the overall supply.

HS28 – Sunnybank Mill, Kirkham

- 5.50 Site HS28 was not previously allocated within the Revised Preferred Options document; however, it is now proposed to deliver 31 dwellings within the plan period. The site does not currently benefit from planning permission and is currently unavailable with existing commercial uses on the site. The site should therefore be removed from the Council's supply unless further evidence in terms of availability is provided.

Other Site Allocations within Kirkham and Wesham

- 5.51 Our Client does not wish to make comments in relation to Sites HS29, HS30, HS31, HS32, HS33, HS34, HS35 and HS36.

Summary

- 5.52 Our Client has concerns with the deliverability of the Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) strategic sites in terms of the proposed delivery rates and timescales for delivering required infrastructure. The failure to deliver these sites would represent a fundamental failing of the Plan, unless significantly greater provision is found through further allocations.
- 5.53 Our Client is also concerned that Sunnybank Mill, Kirkham (HS28) and Oaklands Caravan Park (HS27) are currently unavailable or unsuitable for development and should therefore be removed as allocations. The delivery rates proposed at Willowfields, Wesham (HSS10) and Blackfield End Farm (HSS2) are considered unrealistic and should be reconsidered in line with our comments above.
- 5.54 The Council has identified enough land to accommodate a supply of 7,891 dwellings, 121 dwellings above the proposed housing requirement. Given our Client's concerns in relation to the deliverability of a number of proposed allocation, it is considered that the Council has failed to provide an adequate land to ensure that the housing requirement is met and to ensure the plan provides sufficient flexibility to adapt to rapid change as required by paragraph 14 the NPPF.

5.55 Our Client considers that the Council must look to allocate additional sites to ensure that if there is a failure to deliver, an ongoing shortfall is avoided. This includes the allocation of sites within rural villages.

EXTRACT FROM SECTION 4 – DISTRIBUTION OF HOUSING

Table 2: Distribution of Development to 2032

No		Total Housing and percentage of total supply	New Employment land
SL1	Lytham and St Annes Strategic Location for Development	2,311 - 29.3%	53.1Ha
SL2	Fylde-Blackpool Periphery Strategic Location for Development	2,310 - 29.2%	49.5 Ha (including Blackpool Airport EZ)
SL3	Warton Strategic Location for Development	840 10.6%	0.0 Ha
SL4	Kirkham and Wesham Strategic Location for Development	1,141 - 14.5%	1.1 Ha
SL5	Non-Strategic Locations for Development	762 - 9.7%	2.4 Ha
	Allowances and unallocated sites	998 - 12.6%	0.0 Ha
	TOTAL	7,891 - 100%	62.0 Ha (including Blackpool Airport EZ)

- 4.1 Our Client continues to support the general principle of adopting a spatial approach to development; however, we remain concerned that the overall proposed housing requirement of 7,700 homes, would fail to meet the full objectively assessed housing needs of the Borough. It therefore automatically follows that the proposed spatial distribution of housing between the four Strategic Locations, Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements is also flawed.
- 4.2 Table 2 above of the Publication Draft Document sets out the Council’s proposed distribution of development. The Council has identified enough land to accommodate a supply of 7,891 dwellings, 121 dwellings above the proposed housing requirement. Our Client is concerned that this is not an adequate buffer to ensure that the housing requirement is met and to ensure the plan provides sufficient flexibility to adapt to rapid change as required by paragraph 14 the NPPF.
- 4.3 It is anticipated that four ‘Strategic Locations’ will deliver 80% (6,602 dwellings) of the Council’s total housing requirement. In principle our Client is in agreement that the four ‘Strategic Locations’ will provide the principle source of employment, services, shops and public transport in the Borough, and are therefore the most suitable and sustainable locations at which to meet a large proportion of the future development needs of the Borough. However, as per our

previous representations, our Client has concerns over assumptions made by the Council in terms of expected delivery rates and whether these larger strategic sites, Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) in particular will deliver the proposed number of dwellings within the plan period.

- 4.4 The large scale of the Fylde-Blackpool Periphery Strategic Location means that it may be developed by multiple housebuilders. Whilst this would increase the overall output of housing units achieved per year in comparison to a smaller sites, the annual delivery rate from these sites must not be overestimated as increased local market competition can serve to dampen delivery rates typically achieved. The rate of delivery from these sites must not therefore be assumed to increase incrementally at a rate which is consistent with sites of one or two developer outlets, but decreased proportionately with each new additional developer to take account of the effects of market saturation. Whilst the application of these recommendations would represent a cautious approach, it would significantly strengthen the position of the Council especially where a 'Strategic Site' achieves exceptional delivery rates.
- 4.5 The Council must also recognise that the delivery of the strategic sites at Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) will be difficult due to their scale and complexity. Such sites may be subject to multiple landownerships, and/or require a significant amount of upfront investment to enable their delivery (such as new road infrastructure, utilities and education provision). Lead-in times for the delivery of these sites can be significantly prolonged, and as a result cannot be reasonably expected to contribute to short term supply needs. A detailed critique of the deliverability of each site within the four Strategic Locations is made within Section 5 of this report.
- 4.6 Our Client contests that the Council must look to allocate additional sites within the Local Plan which are suitable, available and deliverable and will help to achieve the Borough's objectively assessed needs.
- 4.7 The Council should consider allocated sites within Tier 1 and Tier 2 rural settlements such as Elswick as part of the Local Plan process. The allocation of sites in Elswick should not be left until the Neighbourhood Plan, for which there is no certainty will come forward. Allocating more sites within these settlements will ensure more housing comes forward earlier in the plan period. This in turn will help to address the lack of a five year supply currently faced by the local authority. Our Clients land at Mill Lane is suitable, available and deliverable within the first five years of the plan period, it should therefore be allocated within the local plan.

Allowances and Unallocated Sites

- 4.8 Table 2 of the Publication Draft Document allocates 12.6% (998 dwellings) of the total housing requirement to be met through '*allowances and unallocated sites*' over the plan period. As drafted, it is unclear from the policy or supporting text what is included within this allowance.
- 4.9 A review of the Housing Trajectory at Appendix 2 of the Publication Draft Document would indicate 'allowances' include:
- Small site completions from 2011 to 2016 (125 dwellings);
 - Small site commitments and minded to approve sites from 2017 to 2021 (unallocated sites) (383 dwellings);
 - Small sites and windfall allowance (unallocated sites) from 2021 to 2032 (440 dwellings); and
 - Long term empty homes re-entering the market from 2016 to 2020 (50 dwellings).
- 4.10 Our Client considers that Table 2 should be updated to itemise each allowance to provide greater clarity as to what is meant by '*allowances and unallocated sites*'.
- 4.11 Notwithstanding this, our Client wishes to make the following comments in relation to the proposed inclusions of allowances within the housing land supply.

Small Sites Committed and Mined to Approve from 2017 to 2021

- 4.12 The Council includes an allowance of 383 dwellings within the housing supply for small sites which are committed or minded to be approved. It is unclear from the Publication Draft Document and associated evidence base whether this figure suggests all committed sites will be deliverable. In our Client's view a non-delivery allowance should be applied to this figure to take into account the fact not all of the permissions will come forward.

Windfall Allowance

- 4.13 Paragraph 48 of the NPPF is clear that:

"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply..."

- 4.14 Paragraph: 24 Reference ID: 3-24-20140306 of PPG goes on to state that:

"Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area

(using the same criteria as set out in paragraph 48 of the National Planning Policy Framework).

- 4.15 Our Client objects to the inclusion of a windfall allowance within the Council's housing land supply as the Council has failed to provide any compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.
- 4.16 Paragraph 10.23 of the Publication Draft Document states a number of small sites and windfall homes may be built over the plan period based on previous small sites and windfall trends. In our Client's view, the adoption of a robustly prepared and up-to-date Local Plan may result in a reduction in the number dwellings coming forward on windfall sites in contrast to past trends. A sufficient supply of housing land will reduce the need for windfall development coming forward during the plan period. The thorough preparation required in adopting the plan will mean that many potential windfall sites will already be known and allocated by the Council.
- 4.17 Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of windfall allowance is not used as a mechanism to reduce the numbers of sites allocated within the plan.

Long-term Empty Homes

- 4.18 The NPPF indicates that local planning authorities should identify and bring back into residential use empty homes and buildings in line with empty homes strategies and, where appropriate, acquire property by compulsory purchase.
- 4.19 PPG goes on to state that 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 (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans).
- 4.20 In calculating the housing requirement for Fylde, the Council has applied a vacancy rate of 6.6% to the household projection. As stated in paragraph 10.59 of the Publication Draft Document the Council intends to identify and bring back into use empty housing and buildings in line with local housing and empty homes strategies. Whilst this may be the case, the Council has provided no robust evidence to substantiate this claim. Until such time, the inclusion of re-occupation of empty homes cannot be recognised as a legitimate source of supply in terms of

meeting housing need against the housing requirement. It should therefore be removed from the overall supply.

Summary

- 4.21 In summary, our Client is concerned that the Council has not identified sufficient land to meet the Borough's objectively assessed housing need and to ensure that the plan provides flexibility and choice as well as being able to rapidly respond to changing circumstances as required by the NPPF.
- 4.22 Our Client considers the assumptions made by the Council in terms of timescales and expected delivery rates are unrealistic and they must look to allocate additional sites within the Local Plan which are suitable, available and deliverable and will help to achieve the Borough's objectively assessed needs.
- 4.23 The Council has also failed to provide any compelling evidence for the inclusion of windfall sites and re-occupation of long term empty properties within the Council's housing land supply. Until such time, the Council can demonstrate that this is a legitimate source of supply it should be removed from the overall supply.
- 4.24 Overall, our Client objects to the proposed spatial distribution of development as it is not positively prepared, justified, effective or consistent with national policy.

