

**INDEPENDENT EXAMINATION OF THE
FYLDE COUNCIL LOCAL PLAN**

**INSPECTOR'S MATTERS, ISSUES AND QUESTIONS
(Stage 1 Hearing Sessions)**

**Matter 2 – Objectively assessed housing and
economic development needs**

Hearing Statement on behalf of The Rigby Organisation

March 2017

PWA_15-123_M2

1. INTRODUCTION

- 1.1. PWA Planning is retained by The Rigby Organisation (RO) in respect of a number of sites across Fylde Borough, including land within Wrea Green as well as land close to Junction 3 of the M55 Motorway and north of Kirkham / Wesham.
- 1.2. On behalf of RO additional employment land allocations are sought close to M55 Junction 3 as well as additional housing land allocations within the key settlement of Wrea Green.
- 1.3. The statement responds to selected questions set out within Matter 2 of the Inspector's Matters, Issues and Questions. The responses should be read together with the comments previously provided on the submission version of the Local Plan.
- 1.4. This statement is intended to follow the format provided by the Inspector in her MIQs document dated 06 February 2017.

Matter 2 – Objectively assessed housing and economic development needs

Question 11.

Does the identified Fylde Coast HMA provide a robust and appropriate basis for assessing housing needs?

1.5. Yes we consider the Fylde Coast HMA to provide an appropriate basis for assessing housing needs.

Question 12.

The SHMA and its Addendums identify the OAN figure for Fylde as a range, based on the 2012-based sub-national household projections (SNHP). The DCLG released its 2014-based SNHP in July 2016. The Council refers to there being only a 1% difference in projected household numbers between the 2012 and 2014-based projections, though this is over slightly different timescales. Further to my initial questions to the Council (EL1.001a), its response (EL1.001b) indicates that the actual increase is less than 1% taking account of the different periods and it is not considered that this has any significant implications for the OAHN. Is this justified by the evidence? Is the use of the 2012-based sub-national household projections as a ‘starting point’ for identifying the OAHN appropriate? What bearing, if any, would the latest household projections have on the assessment of the OAHN?

1.6. There can be little doubt that, given the availability of the 2014 based sub-national household projections, these should be used as a basis for calculating future housing needs. This approach is required by national guidance. It is neither clear that the increase will be as modest as the Council suggest, nor that this will not have any significant implications for the OAHN, particularly as the Council acknowledge that the figure of 370 dpa represents only a base level of demographic need.

Question 13.

Is the OAHN range of figures identified in the SHMA soundly based?

1.7. There is no fundamental disagreement with the range of figures, however the use of the latest household projections will further reinforce the need to choose a figure at the upper end of the range, if not beyond – taking into account other matters related to the duty to cooperate.

Question 14.

Does the assessment of OAHN take sufficient account of market signals as well as other market indicators in relation to the balance between the demand for and supply for housing?

1.8. The figure for OAHN chosen by the Council does not take sufficient account of market signals, given levels of demand for housing in Fylde and the need to address needs in the neighbouring district of Wyre.

Question 15.

Has the assessment of OAHN taken account of other factors including vacancy rates and second homes?

1.9. We have no further comments.

Question 16.

In relation to affordable housing:

a) Is the SHMA's methodology for assessing affordable housing needs robust and in line with Government guidance?

1.10. We have no reason to dispute this.

b) The Plan recognises that the full amount of affordable housing needed per annum is not deliverable. Has the Council considered the option of a higher housing requirement to assist in delivering more affordable dwellings?

1.11. It does not appear that the Council has given due consideration to an overall increase in the housing requirement in an effort to plan to better meet the affordable housing needs of the Borough. Again this suggests that a higher housing requirement, certainly towards the upper end of the range identified in the SHMA, is called for.

Question 17.

Have the needs of particular groups (e.g. the elderly) and types of housing (e.g. private rented, self-build) been satisfactorily assessed?

1.12. We have no further comments.

Question 18.

Have employment trends been appropriately taken into account? Is the OAHN aligned with forecasts for jobs growth?

1.13. No. There is little evidence that the OAHN is aligned accurately with forecasts for jobs growth, either within the SHMA or the Employment Land Review. The choice to adopt a housing need figure at the lower end of the range is not adequately justified, certainly when considered against realistic forecasts for jobs growth.

Question 19.

In relation to gypsies, travellers and travelling showpeople, and further to the Council's additional evidence provided (EL1.002) following my initial questions (EL1.001a), what is the objectively assessed housing need up to 2032? Is this new identified need soundly based, consistent with national policy and supported by robust and credible evidence? What implications does this have in relation to the housing requirement for gypsies, travellers and travelling showpeople as set out in Policy H5?

1.14. We have no further comments

Issue 4

Are the objectively assessed economic development needs clearly identified, supported by robust and credible evidence and consistent with national policy?

Question 20

Has the functional economic market area been adequately defined?

1.15. We have no further comments.

Question 21

The SHMA assesses a range of economic development forecasts. What are the job needs and role of Fylde economically? What is the objectively assessed economic development need for the Borough?

1.16. This is principally a matter to which the Council can respond.

Question 22

Is the Plan's economic development strategy (based on a continuation of historic land take-up) justified, consistent with national policy and compatible with that for the housing strategy?

- 1.17. The Plan's economic development strategy is based on one of the scenarios identified in the Employment Land and Premises Study (Examination reference ED041a). Whilst this indicates a requirement figure above other scenarios, it has been chosen by the Council in an effort to ensure that the needs of the Borough are adequately met, based on long-run historic land take-up. It is not a matter to which we would raise specific objection.
- 1.18. For reasons stated previously it is not clear that the economic development strategy is adequately supported by the housing strategy. The strategies appear to take broadly opposite stances. For reasons previously indicated it seems evident that the housing strategy needs to be properly aligned to the realistic needs and the intentions of the economic development strategy.