

**INDEPENDENT EXAMINATION OF THE
FYLDE COUNCIL LOCAL PLAN
INSPECTOR'S MATTERS, ISSUES AND QUESTIONS
(Stage 1 Hearing Sessions)**

Matter 3 – Housing and employment requirements

Hearing Statement on behalf of The Rigby Organisation

March 2017

PWA_15-123_M3

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 3 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 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?

Question 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?

1.5. As is evidenced by reference to our previous submissions and those contained within our responses to the other matters, it is considered that the figure of 370 dpa is NOT soundly based and is NOT supported by robust evidence.

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

1.6. No. It is likely to result in a significant shortfall in meeting the full objectively assessed housing needs.

c. Will it significantly boost housing supply?

1.7. It is of course acknowledged that the figure exceeds recent annual completions by some margin, however past completion rates have consistently failed to meet identified requirements. It is difficult to accept that, in failing to meet the full objectively assessed housing needs identified in the SHMA, that the figure of 370 dpa will significantly boost housing supply. It would seem reasonable to assume that the significance of the boost in supply should be assessed against the FOAHN and only a figure which achieves this can be said to meet this test.

1.8. By contrast a much-increased figure at the upper end, if not above, the identified range set out in the SHMA will certainly more significantly boost housing supply whilst achieving the more fundamental aims required of a local plan.

Question 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

1.9. Whilst the Council considers that allocations within the plan show a supply of specific deliverable sites to meet the housing requirement for five years, the method by which the Council has arrived at this assessment remains lacking in clarity and in some respects does not follow best practice. Even accepting an annual requirement of 370dpa, the Council has sought to make-up the

considerable backlog since the start of the plan over the remainder of the plan period. Other methods of assessing the 5 year housing supply might suggest that this backlog ought properly to be addressed in the proceeding five years, in addition to which the buffer of 20% then ought to be applied. This results in an increased 5 year requirement which is better aligned to the need to boost significantly the supply of housing.

- 1.10. It is also not clear that the Council's assumptions on build-out rates and development start dates are realistic. The reliance on a number of large sites with some significant infrastructure constraints adds to the uncertainty regarding the accuracy of the assumptions. In particular it is understood that Queensway and Whyndyke Garden Village are already subject to slippage and are substantially behind the projected rate of development.
- 1.11. Combining the requirement and supply side issues, would suggest that the Council will in fact be unable to demonstrate a supply of specific, deliverable sites to meet the housing requirement for five years from the point of adoption.

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

- 1.12. Similar concerns exist in respect of the 6-10 year supply, where the reliance on a much smaller number of larger sites increases significantly. Failure to deliver or significant slippage will leave the Council unable to meet its housing needs.

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?

- 1.13. We consider that additional housing allocations are required to address the concerns. The addition of further land allocations in other appropriate locations across the Borough would ensure that there is a greater prospect of minimising the chances that the housing needs will not be met. It will also provide greater levels of flexibility and choice, as highlighted in NPPF.

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.

Question 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?

- 1.14. We do not object to the identified requirement for employment land within the Local Plan, which we believe to be consistent with one of the scenarios examined in the Employment and Premises Study.
- 1.15. However as stated within our comments in relation to the submission version of the Local Plan, we believe that the spatial distribution of new employment allocations is inappropriate and will not fully meet the needs of the Borough. Of the total 62 hectares of new employment land allocations, some 49.5 hectares (82.5%) is located in the Fylde / Blackpool periphery Strategic

Location. Even accounting for the expected delivery of some of the requirements for Blackpool with the Fylde area, there is a disproportionate concentration of employment land in a small area on the very periphery of the Fylde Borough. The Fylde Employment Land and Premises Study identifies other broad locations, particularly those which can take advantage of the proximity to the motorway network and which would support growth in the heart of the Borough and would hence address this imbalance. Given the projected timescales for the delivery of one of the largest identified employment sites within the plan, at Whyndyke Garden Village, it is considered that further specific employment land, outwith the Fylde / Blackpool Strategic Location should be identified within the plan.