

Fylde Council Local Plan to 2032

FYLDE BOROUGH COUNCIL STATEMENT

MATTER 5

HOUSING – SITE ALLOCATIONS AND DELIVERY

Stage 2 Hearing Sessions

June 2017



Contents

Matter 5	Housing – Site Allocations and Delivery	Page
<i>Issue – Does the Plan set out a positively prepared strategy for the supply and delivery of housing that is justified, effective and consistent with national policy?</i>		
1.	In relation to the 5 year supply does the Plan clearly set out annual targets, completions to date, the approach to catching up the shortfall and the buffer to be applied?	6
2.	Appendix 2 of the Plan includes a housing trajectory for the Plan period. In light of the Council’s recent evidence this is proposed to be updated. However is it necessary to include site specific details given it may quickly become out of date? Should a housing trajectory graph be included in the Plan?	8
<u>Site Allocations – Policies SL1 – SL5</u>		
3.	In light of further planning permissions that have been brought to my attention, do these policies need updating with new sites?	9
4.	Policy SL5 relates to sites that are not within Strategic Locations for Development (SLD). Is its inclusion within the chapter on SLD appropriate and effective?	9
5.	The policies refer to masterplans and design codes for each site without planning permission in the case of Policies SL1 and SL2 and specific strategic sites without planning permission for Policies SL3 and SL4. Are these justified and consistent with Policy M1?	10
6.	Is the methodology for site assessment and selection robust and justified?	10
7.	Are the proposed housing site allocations in Policies SL1-SL5 justified and deliverable? Are the delivery rates for the sites reasonable and achievable?	11
8.	In Policy SL5 no sites are listed for Elswick as these will be determined as part of the Neighbourhood Plan (NP). What is the timescale for the NP and is this approach justified?	20

Policy H1

9.	H1b refers to performance monitoring in relation to housing delivery. Can the Council clarify the purpose of the rolling 3 year review period and how 'the delivery of uncommitted sites will be adjusted' if completions targets are missed by 20%? Is this justified and effective?	21
----	---	----

Policy H2 – Density and mix of new residential development

10.	A minimum density of 30 dph is proposed under Policy H2. Is this justified across all development sites, whether small or large?	21
-----	--	----

11.	Does the policy adequately address the needs of different groups in the community in accordance with the first two bullet points in paragraph 50 of the Framework?	22
-----	--	----

12.	Should the policy include specific reference to the proportion of dwellings to be provided by size? Is this justified or could the data become out-of-date during the Plan period? Is it clear what proportions of dwelling size would be required in different locations?	23
-----	--	----

13.	The policy requires the delivery of at least 20% of homes on sites of 20 or more dwellings to be designed to accommodate the elderly. Is this justified and based on robust evidence?	24
-----	---	----

14.	Is the requirement for specialist accommodation to include compliance with the optional technical standard for wheelchair adaptable dwellings justified and based on robust evidence of identified need? Has the impact of applying these standards on viability of schemes been considered? (Also see Policy GD7)	25
-----	--	----

15.	Evidence set out in supporting text to Policy H2 states that rural areas have significantly fewer 1 and 2 bedroom homes than other parts of the Borough. Therefore whilst H2 states that 50% of developments of 10 or more dwellings should be 1-3 bed, 33% of home in rural settlements should be 1-2 bed. What is the source of this?	26
-----	---	----

16.	Does the policy provide sufficient flexibility to react to market forces?	26
-----	---	----

Policy H4 – Affordable housing

17.	It has been suggested that Policy H4 should be amended so that residential developments at the Fylde-Blackpool periphery should provide financial contributions for affordable housing to be spent in Blackpool. Has this approach been considered by the Council and is it reasonable?	27
18.	Under tenure the policy refers to the provision of starter homes. Is this appropriate in light of the Housing White Paper?	27

Policy H5 – Gypsies, Travellers and Travelling Showpeople’s Sites

19.	In light of the new needs evidence (<i>Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update 2016 (EL1.002)</i>) what implication does this have for Policy H5?	28
-----	---	----

Policies H6 and H7 – Homes in the Countryside

20.	Do these policies apply to the countryside, Areas of Separation and the Green Belt? Is this clear within the policies?	28
21.	Is Policy H6 consistent with paragraph 55 of the Framework?	28
22.	Is the increase in size of a replacement or extended home by no more than 33% of the ground floor area of the original home justified and based on robust evidence?	29
Appendix 1	Housing Trajectory Summary Tables	Separately

Matter 5 – Housing – Site Allocations and Delivery

Issue – Does the Plan set out a positively prepared strategy for the supply and delivery of housing that is justified, effective and consistent with national policy?

1. In relation to the 5 year supply does the Plan clearly set out annual targets, completions to date, the approach to catching up the shortfall and the buffer to be applied?

1.1 The Housing Trajectory (Appendix 2) sets out the yearly requirement and the total provision for each year, including completions in years 1 to 5. The shortfall from years 1 to 5 is shown incorporated within a raised requirement figure for years 6 to 21.

1.2 A revised Housing Trajectory has been provided with the Council's letter to the Inspector of 10th May; however, this omitted the final three rows on the last page as shown in the original plan Trajectory.

1.3 An Appendix to this document includes a revised Housing Trajectory, with the three rows reinstated, and a fourth row added to show cumulative performance through the plan period. The revised Housing Trajectory shows the Council's new annual Housing Requirement of 415, total plan requirement of 8715, and how this is to be delivered over the plan period. Years 1-6 show the figure of 415 as the requirement, with the shortfall accrued up to that point (a total of 952 homes) being spread over the remainder of the plan period giving an annual requirement for the remainder of the plan period of 478 homes.

1.4 The Council produces an annual Five Year Housing Supply Statement, which considers the ongoing supply of sites against the requirement. The Council has released its statement for the base date 31st March 2017, assessed against the new housing requirement of 415 homes per annum. However, in advance of the completion of the Examination of the Local Plan, the latest Five Year Housing Supply Statement uses the Sedgefield method of calculating the supply, based on the requirement to deal with the backlog over 5 years; this is the approach the Council has taken in relation to the determination of planning applications, based on the absence of an up-to-date Local Plan in place.

1.5 The Fylde Local Plan to 2032 adopts the Liverpool approach to the backlog, dealing with backlog over the plan period. This is based on the greater certainty as to delivery of sites provided for by the Local Plan. In this respect, it is important to note that the Fylde Local Plan to 2032, in contrast with some Local Plans that have been adopted, provides a supply of housing sites, with an allowance for small site windfalls, to deliver the housing requirement for the whole Local Plan period in full, rather than merely relying on SHLAA sites for the latter years of the plan period. The Liverpool

approach has been supported by many Local Plan Inspectors, including those who have examined the Blackpool Core Strategy 2015 and the Preston Local Plan 2012-26 (Site Allocations and Development Management Policies DPD) (adopted July 2015) (pages 46-47). These documents will be added to the Council's website as additional evidence documents.

1.6 Additional summary tables of the last three lines of the Housing Trajectory have been produced to show the effect of the Liverpool and Sedgefield methods of calculating the five-year supply on the plan, attached as an Appendix to this document. The Liverpool table shows the initial requirement of 415; for years 7-11 this figure is elevated to include the 20% buffer, giving a figure of 574 homes per annum, whilst the remainder of the plan period provides for the rest of the shortfall, giving a requirement of 431 homes per annum. The Sedgefield table shows the five year requirement in years 7-11 of 726 homes annually, with the requirement subsequently reducing to 354.

1.7 Although the assumptions in the plan provide for in excess of the Sedgefield requirement for four of the first five years, for the plan to rely on the Sedgefield method for its five year supply calculation would put the effectiveness of the plan at risk, as such numbers are far in excess of the record delivery rates of developers across the borough. The figure of 455 homes delivered in 2016-17 is the highest delivered: previously the highest figure was 394 in 2007/2008. The threat of the plan's housing policies being rendered out-of-date at a relatively early stage in the plan period, and the presumption in favour of sustainable development being invoked, could lead to a plethora of less suitable sites coming forward, threatening the delivery of the sites in the plan and the development strategy with it. The Council is clear therefore that targets for the delivery of housing in the plan should be based on the Liverpool method.

1.8 Paragraphs 10.15 to 10.19 of the plan explain the approach to delivery of the housing target. The paragraphs require some revisions in order to accord with the proposed annual requirement of 415 homes, and updates to the supply. Changes are suggested as follows:

10.15 *Councils are required to have a five year supply of housing land available (SHLAA, 2015). Where an authority is unable to demonstrate a five year supply, applications for housing development will be decided with regard to policy NP1, the 'presumption in favour of sustainable development'. Unless there is an overriding reason why an application should be refused, the Council may find it difficult to resist development which it may consider unsuitable for other reasons. The housing supply will be reviewed at least annually as part of the Council's Authority Monitoring Report.*

Housing Delivery

10.16 *The historic rate of delivery of new homes in Fylde, before the recession, averaged around 250 homes each year. The annual housing requirement for Fylde is ~~370~~ 415 dwellings per annum. A calculation of ~~370~~ 415 dwellings per annum for 21 complete calendar years from 1 April 2011 to 31 March 2032 produces an overall housing requirement figure of ~~7,768~~ 8,715 for the Plan period. The Council has identified sufficient sites, including an allowance*

for small sites and windfalls, to provide a supply figure of ~~7,891~~ 8,793 homes over the Plan period.

10.17 The supply provides a small amount of headroom above the housing requirement for the Plan period:

- Requirement: ~~7,768~~ 8,715 homes
- Proposed supply: ~~7,891~~ 8,793 homes

The proposed supply will provide approximately ~~376~~ 419 homes over 21 years which amounts to an extra ~~6~~ 4 homes per year.

10.18 The housing requirement figure relates to all types of housing including apartments, family housing and housing for specific needs such as the elderly and includes both market and affordable housing. The allocation of new homes over the Plan period to 2032 is set out in policy **H1** below.

10.19 The trajectory at **Appendix 2** sets out in detail when it is anticipated that individual sites will deliver homes, throughout the plan period to 2032. The Council's annual monitoring of housing completions has revealed that since the start of the Local Plan period a shortfall of ~~802952~~ homes has accrued. Planning application commitments amount to ~~5,087~~ 5,320 homes as at 31 March ~~2016-2017~~. This means that is ~~65%~~ 61% of the plan period's requirement already has planning permission. Completions are anticipated to increase as larger sites commence delivery. The shortfall of ~~802952~~ homes has been spread over the remainder of the plan period and added onto the annual requirement figure of ~~370~~ 415 homes resulting in an annual requirement figure of ~~420478~~ homes from ~~2016~~2017-2032.

2. Appendix 2 of the Plan includes a housing trajectory for the Plan period. In light of the Council's recent evidence this is proposed to be updated. However is it necessary to include site specific details given it may quickly become out of date? Should a housing trajectory graph be included in the Plan?

2.1 The site specific details in the Housing Trajectory are considered beneficial. The plan as published and submitted relies to a considerable degree on the schedule of identified sites for its delivery. Whilst this is achieved through Policies SL1 – SL5, explanation of the delivery of such a number of sites is best achieved through the tabulation that is provided by the Housing Trajectory. This allows sites where delivery is complete, partially complete, about to start or coming forward later to be clearly distinguished, without recourse to excessive narrative which on over 70 sites would come to dominate the plan.

2.2 A housing trajectory graph has not been included as the Council considers that the information in the final rows of the Trajectory provides a clear indication of the profile of delivery against the requirement.

Site Allocations - Policies SL1-SL5

3. In light of further planning permissions that have been brought to my attention, do these policies need updating with new sites?

3.1 The Council agrees that it would be sensible to add the new approved sites to the policies, for the sake of consistency and to recognise the contribution of those sites to the delivery of the plan.

3.2 The updated Housing Land Supply Trajectory (EL5.003g) includes within its listing the following additional sites which it is proposed to number as follows, in accordance with the modifications schedule submitted on 3rd May 2017. The following sites should also be added to Policy SL1:

- Westmoreland House HS58;
- Land to east of Sefton Road HS59;
- Valentine Kennels HS60;
- Roseacre, Wildings Lane HS61;
- Keenans Mill HS62;
- Dalmeny Hotel HS65.

The following sites should be added to Policy SL3:

- Land North of Freckleton Bypass HSS12;
- Clifton House Farm HSS13.

The following sites should be added to Policy SL4:

- Brook Farm Dowbridge HS57;
- Campbells Caravans HS63.

The following site should be added to Policy SL5:

- Land West of Church Road Weeton HS64.

3.3 In addition, some adjustments are needed to the total numbers to be delivered on sites, again these are listed within the modifications schedules.

3.4 Revised proposed modification schedules will be prepared to follow this submission.

4. Policy SL5 relates to sites that are not within Strategic Locations for Development (SLD). Is its inclusion within the chapter on SLD appropriate and effective?

4.1 Policy SL5 is necessary in order to allocate and identify sites outside the strategic locations for development that will make a contribution to the plan total. Individually, the sites within the non-strategic locations are not of strategic importance, however, taken as a whole, they represent a significant element of the overall Development Strategy. Therefore the inclusion of Policy SL5 is warranted.

5. The policies refer to masterplans and design codes for each site without planning permission in the case of Policies SL1 and SL2 and specific strategic sites without planning permission for Policies SL3 and SL4. Are these justified and consistent with Policy M1?

5.1 The requirement for masterplanning is intended to apply to all strategic sites within strategic locations. Masterplans may not necessarily be established in detail at the stage of making an outline application, but are required for all strategic sites within the strategic locations in order that a coherent form of development is produced that optimises the creation of healthy communities, by maximising the potential for new residents to gain sustainable access to services, co-ordinating green infrastructure networks and ensuring mutual benefits from the development for existing neighbouring areas and the wider settlement. This is following the principles set out in the Framework in paragraphs 61, 69, 70, 73, 35, 38 and the core principles in paragraph 17.

5.2 It is recognised that the existing wording has created confusion as to when the masterplanning and design code elements of Policies SL1 – SL4 are intended to apply. It is therefore suggested that the wording of each policy should be altered as follows:

Masterplans and approved design codes for each strategic site listed above (where they do not have full planning permission for the whole site) ...

5.3 This clarifies that this requirement is not intended to apply to non-strategic sites. Policy M1 should also be amended:

Masterplans and design codes will be prepared by the prospective developers, with the approval of the Council for each ~~allocation~~ Strategic Site within the Strategic Locations for Development named in policy **DLF1**.

6. Is the methodology for site assessment and selection robust and justified?

6.1 The sites included within the plan are principally sites with planning permission, or sites where the council has resolved to grant permission. Some of the former were granted permission on appeal. However, almost all sites have appeared at some point within the formal selection process, and the process that has been undertaken is robust.

6.2 There have been four 'calls for sites' undertaken by the Council. The first was April 2007. The second was 17 January 2008 until 15 February 2008. A third call for sites was made as part of the consultation on the SHLAA which lasted from 4 March to 6 April 2010. Sites were also put forward as part of the Issues, Vision and Objectives consultation which took place from 7 February – 25 March 2011, the Issues and Options consultation which took place from 7 June – 19 July 2012 and the Preferred Option consultation in summer 2013. Following the call for non-strategic sites in January to February 2015, the details of approximately 140 sites were submitted to the council for due consideration, including both strategic and non-strategic sites. Non-strategic sites are capable

of accommodating up to 99 new homes. All sites put forward have been included as part of the assessment of sites.

6.3 Sites selected as potentially deliverable (suitable, available and achievable) have then been assessed further through the Strategic Site Assessment (ED028a to ED028g) in the case of sites of strategic size (at least 100 homes) or through both that and the Site Assessment Background Paper (ED004) for all sites.

6.4 In parallel to the site assessment process, further iterations of the plan itself, the Preferred Option 2013 (EL3.002) and the Revised Preferred Option 2015 (EL3.003) have been subject to consultation and Sustainability Appraisal. This has provided the opportunity for issues with particular sites to be raised, and other sites to be put forward.

6.5 The Strategic Site Assessment (ED028a to ED028g) considered each strategic site or potential strategic site against a range of sustainability indicators. Document SD028b shows the overall results. A detailed assessment of the sites is provided through the site portfolios in documents ED029c to ED029g, with a recommendation.

6.6 The Site Assessment Background Paper (ED004) provides a detailed explanation of the overall site selection process. It includes a summary of the sites considered for inclusion in the plan at the time of the preparation of the Publication Version. Each site is considered in relation to deliverability of the site, its sustainability and the deliverability of supporting infrastructure. A recommendation is provided, with reasons.

6.7 The Sustainability Appraisal of the Publication Version Local Plan provides a further assessment of the sites in relation to sustainability objectives. This includes a detailed site appraisal through scoring (SD004c, Appendices H and I), and a consideration of the reasonable alternatives (SD004c, Appendix J).

6.8 The portfolio of sites that has resulted from the process provides for the delivery of a balanced strategy over the four strategic locations. The individual sites are deliverable, and will individually and as a group contribute to the delivery of sustainable development.

7. Are the proposed housing site allocations in Policies SL1-SL5 justified and deliverable? Are the delivery rates for the sites reasonable and achievable?

7.1 The site allocations in the plan, with the exception of one significant allocation, are sites for which planning permission has been granted or the Council has resolved to grant planning permission. The delivery rates on each site derive from the assumptions used in the Council's annual Five Year Housing Supply Statement (EL1.008 is the interim version). These assumptions have been previously detailed in the response to the Stage 1 MIQs, Matter3, question 24 (EL2.025c, pages 6 and 7). The Council considers the assumptions robust.

7.2 The status of individual sites is set out below:

Policy SL1:

7.3 HSS1 Queensway, St. Annes is a large site on the northern fringe of St. Annes, which is the only area where there is a significant opportunity for major greenfield development adjacent to Lytham St. Annes, the largest settlement in the borough. Outline planning permission for 1,150 homes was granted in 2012. Reserved matters approval for 110 homes on the western part of the site was granted in 2015 and development has commenced. The site is owned by Kensington Developments. A reserved matters application for 927 dwellings is being considered. Delivery of the site will also drive the delivery of the M55 to Heyhouses Link Road, which will have very considerable benefits for the accessibility of Lytham and St. Annes generally. The overall site includes an area to mitigate impacts on ecology, and the provision of a site for a primary school.

7.4 MUS4 Heyhouses Lane is a site within the urban area of St. Annes, on the site of a large area of former government offices. Part of the site is under construction, whilst an outline permission for 160 homes on a further part of the site has been approved. The development of the site has also included a Booths supermarket, a public house (both completed) and a 76-bed care home is under construction.

7.5 HSS3 Lytham Quays, Lytham is a site almost complete, on previously developed land. The site has been constructed during the first part of the plan period.

7.6 HS1 Queen Mary School is a site on a previously-developed former school site within the Lytham and St Annes urban area, which has been completed in the early part of the plan period.

7.7 HS2 Jubilee House, East Beach, Lytham is a major refurbishment of a “legacy” office building and construction of new buildings to provide a combination of modern office space and 20 apartments. The refurbishment of the building is complete but the remaining parts of the development are to follow. A single planning permission covers all parts of the scheme. The site remains owned by the developer, and there are no obstacles to the apartments coming forward immediately.

7.8 HS3 Ashton Nurseries, Mythop Road, Lytham. An application has been received in May 2017 for 12 dwellings.

7.9 HS4 The Gables, 35-39 Orchard Road is a previously-developed site in central St. Annes, where the original buildings have been cleared. The site has been bought by a developer who has made a new full application for 19 apartments which was approved in March 2017. Application has since been made to discharge ten conditions. It is anticipated that construction will start in 2017.

- 7.10 HS5 7-8 St. George's Square, St Annes is an HMO with permission for conversion to flats, originally granted in 2011. The scheme was delivered in 2016-2017.
- 7.11 HS6 68 North Promenade and 1 Sandgate for which planning permission was granted in March 2013 for redevelopment of 2 houses to construct 14 apartments.
- 7.12 HS7 Petros House is a former office building in central St. Annes. Prior approval for change of use was granted in August 2014, and a planning permission for the details of physical alterations was granted in May 2016. Construction is now underway.
- 7.13 HS8 35-37 South Promenade is a previously-developed site on which a development of extra-care apartments for the elderly has been constructed by McCarthy and Stone, since the beginning of the plan period. It is now complete.
- 7.14 HS9 23-33 Fairhaven Road is a previously developed site with planning permission for a development of 32 apartments. The development is under construction.
- 7.15 HS10 34-36 Orchard Road is a site near the town centre for which outline planning permission was granted in 2015 for a development of 14 apartments. Construction has commenced very recently.
- 7.16 HS11 The Galleries, Kingsway is a site in the centre of Ansdell, for which permission was granted in November 2015 for the construction of 10 apartments within a former commercial building. The previous use of the building has now ceased.
- 7.17 HS12 Fairways, Heeley Road is a derelict former garage site in the urban area of St. Annes, for which the council has resolved to grant outline planning permission subject to a section 106 agreement for 20 dwellings. It is anticipated that a further application will be made for this site shortly, and being in a derelict condition there is no prospect of its former use being re-established.
- 7.18 HS13 Kingsway Garage is a commercial site in Ansdell, within a wider residential area, for which the council has resolved to grant outline permission subject to a section 106 agreement, for redevelopment to provide 30 apartments of sheltered housing for the elderly. The site was offered for sale at auction in December 2016 and it is believed that it did change hands.
- 7.19 HS14 AXA, Lytham is an existing business use in central Lytham; the Council has resolved to grant outline planning permission subject to a section 106 agreement for redevelopment to provide 45 dwellings. Prior approval has been sought to demolish the building but the form and type of any further application or proposal is not yet known.
- 7.20 HS15 Land W of Ballam Road is a settlement edge site on the northern fringe of Lytham. The Council has resolved to grant full planning permission for 12 dwellings subject to a Section 106

agreement, which has since been signed. There also exists a permission for 9 units. Development has commenced.

7.21 Developments at the sites HS16 353 Clifton Drive North, HS17 Hastings Point, HS18 Former FBC Depot, HS19 1 Lord Street and HS20 Former Kwik Save have been completed since the beginning of the plan period.

7.22 The following sites should be added to Policy SL1 for completeness, in response to permissions granted since publication:

7.23 HS58 Westmoreland House is an existing office building within St. Annes Town Centre (CHECK) for which prior approval was granted under class O of the GPDO for change of use to 25 residential apartments in June 2016. A subsequent planning application has been approved in November 2016 for physical alterations in connection with the development.

7.24 HS59 Land to east of Sefton Road is a previously developed site within the urban area surrounded by a mix of uses, for which full planning permission has been granted in July 2016 for redevelopment for 12 apartments. Construction is well advanced.

7.25 HS60 Valentine Kennels is a site outside the existing settlement of St Annes, partially enclosed within the adjacent proposed site HSS1 Queensway. Planning permission was granted in March 2017 for 53 dwellings. Inclusion of this site is a change requested by Emery Planning in their representation on behalf of Ideal Corporate Solutions Ltd.

7.26 HS61 Roseacre, Wildings Lane is also located outside the existing settlement of St. Annes, close to site HS60, and also partially enclosed by site HSS1 Queensway. The Council resolved to grant full planning permission for 45 homes in November 2016.

7.27 HS62 Keenans Mill is a former industrial site within a mixed area of St Annes. Full planning permission was granted in February 2017 for the erection of 26 residential units. Pre-conditions have been discharged and construction is underway.

7.28 HS65 Dalmeny Hotel is a site for the redevelopment of buildings at the rear of the hotel site, on land fronting Clifton Drive, St Annes. The Council resolved in March 2017 to grant outline planning permission for 34 homes subject to a section 106 agreement for a contribution to off-site affordable housing.

The current position on sites in Policy SL2:

7.29 HSS4 Coastal Dunes is a large previously-developed site that was formerly the Pontins Holiday Camp. The southern part of the site is under construction, whilst permission for the northern part of the site was granted in March 2017. Due to its location and extent, the site has been subject to Appropriate Assessment under the Habitats Regulations with mitigation for the

development secured through the provision of a warden. The developer Persimmon Homes has made considerable efforts in this process and is fully committed to the site.

7.30 MUS1 Cropper Road East is a greenfield site, located within the Whitehills area close to the M55 junction 4. Parts of the site have come forward as successive parcels of land. The site is under construction by Wainhomes.

7.31 MUS2 Whyndyke Farm is a large greenfield site to the north of the M55 Junction 4, with a small part extending into Blackpool. The site has been accepted as one of the Government's programme of Healthy New Towns. The Council has resolved to grant outline planning permission subject to a section 106 agreement.

7.32 HSS5 Cropper Road West is a greenfield site in the Whitehills area of the Fylde-Blackpool Periphery, directly adjacent to the Cropper Road East site. The site will come forward through the developer Wainhomes, who has control of the whole site. A planning application is expected shortly, but in advance of this, the developer has provided supporting statements and information within their representation to the plan (SD013d pages 1437-1442 and 1465-1515) including evidence of the necessary preliminary work it has undertaken in relation to flood risk/drainage and an indicative masterplan. The site forms a crucial element in delivering a critical mass of housing development in the Whitehills area to provide for a Local Centre to be brought forward, and for the area as a whole to represent sustainable development.

7.33 HSS6 Lytham St Annes Way is a greenfield site in the Whitehills area of the Fylde-Blackpool Periphery. The majority of the site is completed, but a single parcel of land remains.

7.34 HS21 Rear of 11-63 Westgate Road is a previously developed site within the existing Squires Gate Lane urban area of the Fylde-Blackpool Periphery. A part of the original site has now been subsumed into the redevelopment of an adjacent former office building for a Lidl supermarket; a revised scheme for the remainder of the site for 25 homes was approved in November 2016. Policy SL2 and the Housing Trajectory are to be amended to reflect this: the amendment was included within the Schedule of Proposed Minor Modifications (SD014) submitted for information with the plan. Construction of the scheme is well underway.

7.35 HS22 Former Clock Garage is a previously developed site close to the Fylde-Blackpool Periphery area on the A583. A reserved matters application for the site is pending consideration.

7.36 HS23 South of Bridgeside is a previously-developed site for 22 homes within the existing Squires Gate Lane urban area of the Fylde-Blackpool Periphery. Permission was granted in February 2014; application for discharge of remaining pre-conditions was approved in February 2017. The site is likely to be delivered in the short-term; the homes are being advertised on the site.

The current position on sites in Policy SL3:

7.37 HSS2 Blackfield End Farm is a greenfield site located on the northern fringe of Warton. Outline planning permission was granted at appeal for 360 homes in September 2015; a reserved matters application was received in February 2017 for the whole site, as was an application for discharge of conditions; these remain pending consideration. Delivery according to the Housing Trajectory remains likely.

7.38 HSS7 Highgate Park is a previously developed site in Warton with full planning permission for 254 homes, currently under construction, and will continue to be built out over the next 9 years of the plan period.

7.39 HS24 Riversleigh Farm is a site within Warton for 82 homes, with construction well advanced and continuing to deliver.

7.40 HS25 Nine Acres Nursery is a part greenfield, part previously-developed site within Warton. Development of the main phase of 66 homes is complete, however, the residual area remains developable, and is likely to come forward as a separate site.

7.41 HS26 George's Garage is a previously-developed site within the existing built-up area of Warton. Full planning permission was granted in January 2015 for a scheme of 16 affordable homes; a subsequent approval in June 2015 varied this to allow a scheme of 12 market and 4 affordable dwellings. The site is very likely to come forward but it may be for a smaller number of dwellings.

7.42 HS27 Oaklands Caravan Park is an existing holiday caravan/chalet site on the fringe of the existing built-up area of Warton. The Council resolved on 6th January 2016 to grant outline planning permission for up to 53 homes, subject to a section 106 agreement to secure affordable housing, open space and a commuted sum towards education provision. It is acknowledged that the owners have made a subsequent application to change touring caravan pitches to static caravan pitches; nevertheless, it remains likely that redevelopment for residential use will take place.

7.43 The following sites should be added to Policy SL3 for completeness, in response to permissions granted since publication:

7.44 HSS12 Land North of Freckleton Bypass, Warton is a greenfield site to the east of Warton, for which outline planning permission was granted at appeal in February 2017 for 350 homes. A condition restricts the development to 15% of homes prior to the completion of the Preston Western Distributor Road: this is reflected in the Revised Trajectory.

7.45 HSS13 Clifton House Farm, Lytham Road, Warton is a greenfield site in the western part of Warton; outline planning permission was granted for 115 homes at appeal in February 2017. A condition restricts the development to 15% of homes prior to the completion of the Preston Western Distributor Road: this is reflected in the Revised Trajectory.

The current position on sites in Policy SL4:

7.46 HSS8 The Pastures is a greenfield site on the northern edge of Wesham, with permission for 264 homes in total. The whole site has full planning permission; reserved matters approval for the second phase of the site was granted in February 2016. Delivery of the site is in progress, by Rowland Homes.

7.47 HSS9 Land North of Blackpool Road is a greenfield site sometimes known as the Kirkham Triangle, bounded by the A583, railway line and sports pitches. The site has three developers: two have commenced construction, whilst the full application for the third remains pending consideration and is likely to be considered by the Council's Planning Committee shortly.

7.48 HSS10 Willowfields is a site in Wesham for 113 homes, which has been completed in the early part of the plan period.

7.49 HS28 Sunnybank Mill is an existing traditional industrial site in Kirkham, for which redevelopment is proposed. Planning permission was granted on 15th May 2017 for 23 affordable homes on part of the site; the remainder of the site will be available for development for 29 further homes.

7.50 HS29 Crossacres is a site for 106 homes that was mainly constructed before the start of the plan period: the plan included the residual 13 units, the last 4 units of which were completed in 2016-17.

7.51 HS30 Pennine View is a previously developed site in Wesham, on which 12 units can be delivered. The planning permission has lapsed, but the site remains deliverable. The site is shown as delivering in year 5 from the current time, in line with the 5-year supply methodology.

7.52 HS31 Former Fylde Council Offices was completed in 2016-17.

7.53 HS32 West End Residential Park is an extension to an existing residential caravan park. An application for 29 residential park homes was approved in March 2017.

7.54 HS33 Arundel Lodge Nursing Home, HS34 Crossroads, Kirkham, HS35 Henthorne Builders and HS36 St George's Hotel have all been completed in the early part of the plan period.

7.55 The following sites should be added to Policy SL4 for completeness, in response to permissions granted since publication:

7.56 HS57 Brook Farm Dowbridge is a greenfield site on the edge of Kirkham, for which outline planning permission was granted in January 2017 for 170 homes (previously a permission had been granted for part of the site for 95 homes, which is reflected in the Schedule of Proposed Minor Modifications SD014).

7.57 HS63 Campbells Caravans is a previously-developed site on the edge of Kirkham, for which the Council has resolved on 8th February 2017 to grant outline planning permission for 30 dwellings subject to a section 106 agreement for the provision of affordable housing, public realm works and a schools contribution.

The current position on sites in Policy SL5:

7.58 HS37 The Refuge Freckleton is a site with full planning permission for 11 homes, granted in December 2016, on a previously-developed site within Freckleton. Conditions have been discharged and the site is now under construction.

7.59 HS38 Rear of High Meadows Freckleton is a previously developed site in the corner of an existing housing estate, which will provide 13 dwellings.

7.60 HS51 Newton Hall is an allocated site on the southern edge of Newton suitable for 86 homes. The site has landowner support.

7.61 HS52 Cobweb Barn Newton is a site on western fringe of Newton. The site boundary has been adjusted; the extended site could accommodate 54 dwellings.

7.62 HS39 South of Chain Lane Staining was completed in 2016-17.

7.63 HS40 Kings Close Staining is a site for 30 homes, for which reserved matters approval was granted in May 2016. Application has been made to discharge pre-conditions, and construction has now commenced.

7.64 HS41 Thornfield Caravan Park Staining is an existing holiday caravan site within the developed area of the village of Staining. The site is an allocation in the plan, following submission by the site owners to the 2015 Call For Sites. The site will deliver 28 homes.

7.65 HS42 Baines Farm Staining and HS43 Adjacent 18 Chain Lane Staining have both been completed in the early part of the plan period.

7.66 HSS11 Off Willow Drive Wrea Green (now 86 corrected in document SD014 at submission to reflect the latest permission) is a site for 86 homes including 26 affordable units. Reserved matters permission was granted in October 2016, and application to discharge conditions has been made since. Construction has commenced.

7.67 HS44 Adjacent Richmond Avenue Wrea Green is a site for 54 homes that is almost complete, with delivery of the last units expected in the current year.

7.68 HS45 Rear of 45 Bryning Lane Wrea Green is a site for 25 dwellings granted outline approval at appeal in April 2014. A subsequent full application for 36 homes remains currently pending.

7.69 HS46 North View Farm Wrea Green is a site for 42 homes. There is permission for the whole site and construction is underway.

7.70 HS47 Land North of North View Farm Wrea Green is a site on the edge of Wrea Green, adjacent to site HS46, on which an application had been made for 15 homes and the Council had resolved to grant permission subject to a Section 106 agreement. However, the application was withdrawn in late 2016 by the developer. It is understood that the site owner still wishes the site to be put forward for development, and as the site is clearly capable of being brought forward, the site has been retained as an allocation in the plan.

7.71 HS48 Former Wareings' Site Wrea Green has been completed early in the plan period.

7.72 HS49 North of Preston Old Road Clifton is a site for 74 homes for which reserved matters permission was granted in February 2017. Applications to discharge conditions on the outline consent have been made. It is anticipated that development will commence at an early stage.
LATEST?

7.73 HS50 East of Rowan Close Clifton is a site for 30 homes. The Council resolved in September 2015 to grant outline planning permission subject to a section 106 agreement for affordable housing and commuted sums for schools and open space.

7.74 HS53 Singleton Village is an allocation based on an earlier scheme to provide 15 homes and a retail unit along with some open space provision. Although the scheme has been withdrawn, it is clear that 15 homes could be delivered within the site, and the site should therefore remain allocated in the plan.

7.75 HS54 The Laurels and Willow House Weeton is a site for 20 homes that has now been completed.

7.76 HS55 The Rowans has been completed in the early part of the plan period.

7.77 HS56 Sunnydale Nurseries Little Eccleston is a previously-developed site. An earlier outline permission for 25 homes existed; however the Council has since resolved (in February 2017) to grant full planning permission for 41 homes subject to a section 106 agreement to secure affordable housing and education provision. The Revised Trajectory EL5.003g shows the updated position, which will also be amended in Policy SL5.

7.78 The following site should be added to Policy SL5 for completeness, in response to permissions granted since publication:

7.79 HS64 West of Church Road Weeton is a site for 25 homes for which outline planning permission was granted on 1st June 2017 (it remains shown as minded to approve on the Revised Trajectory EL5.003g which has a base date of 31st March 2017).

7.80 Delivery rates for sites in the plan are shown in the trajectory. These are based on assumptions which have been previously explained in the Council's Stage 1 MIQ response (EL2.025c) paragraphs 24a.3 and 24a.4. The approach was developed through a steering group involving representatives from the development industry and environmental groups in accordance with SHLAA Practice Guidance 2007 produced by DCLG, now incorporated into PPG.

7.81 Some developers' consultants, through their submissions, have challenged the inclusion of certain sites. Comments on these sites are necessary:

Fairways Heeley Road is not in use as a garage as stated by one respondent, but is in a very derelict condition. It is believed that this may have been a case of "mistaken identity" as there is a working garage on a corner site further along St. David's Road;

Kingsway Garage was offered for sale by auction in December 2016;

Axa: a prior notification for the demolition of the existing building has been made;

Westgate Road: the Council has already acknowledged that the scheme for 70 dwellings would not come forward, and this was included in document SD014 at submission, with a correction of the figure to 25;

West End Residential Park has since (March 2017) been granted planning permission for 29 residential park homes;

7-8 St George's Square has been developed in 2016-2017

7.82 It should be noted that Inspectors have accepted the inclusion of deliverable SHLAA sites, in addition to allocations and commitments, in determining whether councils have a 5-year deliverable supply of housing land for the purposes of Local Plans. The Fylde Local Plan includes sufficient committed and allocated sites that the need to consider beyond, to SHLAA sites, is not necessary.

8. In Policy SL5 no sites are listed for Elswick as these will be determined as part of the Neighbourhood Plan (NP). What is the timescale for the NP and is this approach justified?

8.1 There is no set timescale for the Elswick NP. The Neighbourhood Area has been approved and Elswick Parish Council are currently working on a document to meet with Regulation 14 of the Neighbourhood Planning Regulations. The Council could have proposed the allocation of land within the Plan for housing at Elswick, however the Parish Council have always expressed a keen ambition to develop a NP and as part of that process allocate land at Elswick which they wished to see developed. This approach is considered justified and is in line with the ambitions of the Localism Act

and the aspirations of the Government as set out in the Housing White Paper 'Fixing out broken housing market'.

8.2 As the neighbourhood plan has not yet been produced (even in draft), consideration has to be given to the stage at which the housing requirements of Elswick will be met. In this respect the Council must make a judgement on any proposals put before it. In cases where sites have been put forward, the Council has determined the applications with regard to the adopted plan, the Framework and the emerging Local Plan. This situation has not prevented sites being brought forward, although the uncertainty for applicants is understood. Sites brought forward have been assessed on their merits. A site for 24 homes will be considered between the submission of this document and the hearing sessions.

Policy H1

9. H1b refers to performance monitoring in relation to housing delivery. Can the Council clarify the purpose of the rolling 3 year review period and how 'the delivery of uncommitted sites will be adjusted' if completions targets are missed by 20%? Is this justified and effective?

9.1 H1b is the Council's self-imposed Housing Delivery Test, devised in advance of the Housing White Paper. The rolling three year review is intended to allow for peaks and troughs in delivery, in the same way as that proposed in the White Paper (A.109 onwards). Delivery of uncommitted sites could involve granting planning permissions for additional sites, where the applicant provided clear and robust evidence of early delivery.

9.2 As the Government has put forward a more complex suite of consequences for under-delivery, this policy may need to include reference to any such emerging requirement.

Policy H2 - Density and mix of new residential development

10. A minimum density of 30 dph is proposed under Policy H2. Is this justified across all development sites, whether small or large?

10.1 The application of a density standard is necessary to prevent the profligate use of land and to ensure that development sites can make the fullest possible contribution to the fulfilment of the housing needs of the borough. This is in accordance with the new Government Guidance provided by the Housing White Paper, paragraphs 1.51-1.53 and A66-A70.

10.2 A policy which applied different net density standards for different sizes of site, or provided exceptions for certain site sizes, would create perverse incentives for developers to bring forward sites in either smaller or larger parcels (according to where the advantage would lie) than would be the optimum for the use of the site. It would also be inequitable, resulting in a small number of very

low density dwellings which would consequently have grossly inflated value due to their scarcity, whilst occupiers of all other development would have to be content with the applied standard.

10.3 The density proposed in the policy has been tested through the viability assessment of the plan. The viability assessment demonstrates that the requirement for at least 30dph does not threaten the viability of sites.

10.4 It is considered that the imposition of a higher general minimum standard would not have been effective, as the requirement would result in development discordant with the existing settlements and result in a lower standard of amenity on new developments which would affect the marketability of new dwellings and hence their deliverability. However, where a developer proposes a higher density, the policy allows for this, but provides criteria to prevent potential harmful effects of badly-planned higher density development.

10.5 The expected standard of 30dph is one that is widely employed by other local planning authorities and best practice, including earlier government guidance.

10.6 The West Lancashire Local Plan 2012-2027 (adopted October 2013) Policy RS1 sets a requirement for a minimum density of 30dph subject to the specific context for each site.

11. Does the policy adequately address the needs of different groups in the community in accordance with the first two bullet points in paragraph 50 of the Framework?

11.1 Policy H2 requires a broad mix of types and sizes of home, suitable for a broad range of age groups, on all sites, reflecting the demographics and housing requirements of the borough identified in the SHMA. This is in line with the requirement of paragraph 50 for local planning authorities to plan for a mix of housing based on demographic trends, market trends and the needs of different groups.

11.2 The SHMA (ED021) shows estimates of the sizes of properties required in paragraph 7.22 (page 124). This reflects the impacts of the changes in household types, shown by the modelling on pages 117-119 of the SHMA. Policy H2 makes specific requirements on the mix, drawing from the evidence in the SHMA: this is considered in more detail in the response to question 12. By requiring a mix reflecting the needs based on different household types, the plan will provide for the needs of these groups.

11.3 The Specialised Housing Background Paper considers the particular needs of the elderly, drawing on the SHMA. The policy makes specific provision for the elderly, including those with mobility/self-care/visual impairment issues. This provision involves specific requirements of developers, which will deliver units of accommodation specifically suitable for the elderly, providing

mitigation for their mobility issues, through the plan period, and therefore contribute to meeting the needs of this group. More detail is given in the answer to questions 13 and 14.

11.4 Custom and self-builders are supported by a section of policy H2, where proposals to provide plots are encouraged. The policy gives a presumption of support on sites suitable for housing, subject to the general requirements of the policy and other policies of the plan.

11.5 In respect of the second bullet of paragraph 50, relating to the housing required in particular locations, the mix required in Policy H2 has been written in recognition that there are issues of affordability in the rural settlements, and that the existing mix in those settlements is skewed towards larger units of accommodation. The policy requirement for developments in rural settlements to include at least 33% 1- or 2-bedroom properties will contribute towards some degree of correction of these imbalances, providing more effectively for the need in those locations.

12. Should the policy include specific reference to the proportion of dwellings to be provided by size? Is this justified or could the data become out-of-date during the Plan period? Is it clear what proportions of dwelling size would be required in different locations?

12.1 The policy is necessary because it is apparent that a number of developers prefer to bring forward schemes for a very narrow range of dwelling types/sizes, most commonly all-large or all-very-large. To allow the borough to develop on this basis would not deliver the wide choice of high quality homes or create sustainable, inclusive and mixed communities as required by paragraph 50 of the Framework.

12.2 The requirement for a mix of dwelling sizes specifically set out in the policy is intended to give greater weight to the requirement than the alternative of, for instance, cross-referring to the SHMA (ED021). The proportions of dwelling sizes required are not drawn directly from the SHMA, but instead represent a compromise position. Table 7.22 on page 124 of the SHMA shows the estimated sizes of properties required, using floorspace ranges which allow analysis to be drawn from types of household that occupy them (figure 7.20 on page 123 of the SHMA). Based on the households that are projected to require accommodation, only 24% will require a home of 90 square metres or larger (3 or 4 bedroom family semi-detached home or detached house), whereas 48% will require a home of less than 69 square metres (1 or 2 bedroom flat or small mews house). The data from Table 7.22 of the SHMA are repeated in Table 6 of the plan (page 102). The Local Plan Policy H2 has provided built-in flexibility from this position, requiring 50% of any development to be 1,2 and 3 bedroom homes, and additionally 33% of homes in and adjacent to the rural settlements to be 1 and 2 bedroom properties, reflecting additionally the scarcity of existing smaller units of accommodation in those settlements (as shown in Table 5 on page 102 of the plan) and the affordability problem that partly derives from this.

12.3 The existing balance of dwelling sizes and the need identified by the SHMA clearly indicate a need to encourage the development of at least a contribution of smaller homes in all developments. This is what the policy will achieve, whilst representing a compromise position that will allow developers to provide a significant proportion of larger homes that form an important part of their strategies. The policy includes the ability to alter the mix later in the plan period if future assessments determine that a change is necessary; however, as it is likely that Local Plans will be subject to compulsory periodic review, such review is likely to include consideration of this issue.

13. The policy requires the delivery of at least 20% of homes on sites of 20 or more dwellings to be designed to accommodate the elderly. Is this justified and based on robust evidence?

13.1 The Specialised Housing Background Paper ED029, pages 15-23, considers the issue of accommodation for the elderly, drawing on evidence from the SHMA, ONS and other sources. The proportion of the borough's population aged 65 and over will increase from 28% to 36.6% by 2030. All of the borough's growth in population over the plan period will be accounted for by people aged 65 and above. The existing provision of specialised accommodation for the elderly consists of approximately 1,100 sheltered housing units and approximately 1,100 care home places. Although data is not available on the suitability of the existing housing stock, nationally only 5.3% of existing dwellings have all four "visitability" features necessary even as a visitor to a dwelling, and which equate to the M4(1) standard required of all new dwellings. There is therefore a need for new developments to contribute to improving the suitability of the housing stock for the elderly.

13.2 A contribution from new sites in order to maintain balanced sustainable communities is in accordance with paragraph 50 of the Framework. A proportion of 20% of new homes to be specifically designed to accommodate the elderly will be enough that it will make a genuine contribution. The threshold is sufficient that the policy will not result in the need for bespoke dwellings on sites. The proportion is reasonable so that developments remain viable, and this has been tested within the Viability Assessment Update (SD006); the proportion would not dominate general sites. There is freedom for developers to determine how they meet the requirement.

13.3 The West Lancashire Local Plan adopted in 2013 also sets out a requirement for 20% of homes, in its case for sites of 15 or more homes, to be designed specifically to accommodate the elderly. In the case of West Lancashire this is layered on top of a requirement for all new dwellings to be built to the Lifetime Homes Standard, which approximates in effect to the accessible/adaptable standard M4(2) although there are differences between them in the actual measures. The West Lancashire Local Plan was therefore found sound with stricter measures overall than proposed in the Fylde Local Plan, although this was prior to the introduction of the new building regulations part M, which requires all new homes to meet the standard M4(1) "visitability" dwellings, requiring accessibility to habitable rooms and sanitary facilities on the entrance storey.

14. Is the requirement for specialist accommodation to include compliance with the optional technical standard for wheelchair adaptable dwellings justified and based on robust evidence of identified need? Has the impact of applying these standards on viability of schemes been considered? (Also see Policy GD7)

14.1 The Specialised Housing Background Paper (ED029) considers the different standards that could be required. These range from M4(1), the basic Building Regulations standard, to M4(3B) which is designed for immediate use by a wheelchair user. It goes on to provide evidence of the number of elderly people in the borough projected to have specific difficulties that may lead them to require specialist accommodation. By the end of the plan period, there will be over 9,600 elderly people unable to manage at least one self-care activity; there will be approx. 2500 elderly blind or partially sighted people; and there will be over 5,400 elderly people with a problem with daily mobility activities. Although such people may choose to continue to live in their existing homes, provision of accommodation that is more suitable will widen the choices available to them, and accords with Strategic Objective 1 of the plan and paragraphs 9, 50 and 159 of the Framework.

14.2 The background paper then relates this to the existing supply of accommodation for the elderly. There are approximately 1100 units of sheltered accommodation and 1100 care home spaces. The wider housing stock is considered: nationally, only 5.3% of homes have all four “visitability” features, which are essential even for visiting access for someone with mobility problems: this equates broadly to the requirements of standard M1, the new building regulations standard that applies automatically to all new dwellings.

14.3 The conclusion is that new development will need to contribute to increasing substantially the stock of dwellings that are genuinely suitable for people with significant specialist requirements. In this regard, the potential alternative requirement of standard M4(2) would result in a larger stock of conventional dwellings with some additional circulation space, but would not address the need for accommodation that genuinely attempts to provide for the needs of the elderly, by providing continuity of accommodation when the situation is reached where mobility problems become severe. For this to be achieved, the standard M4(3A) is required. This requires provision for lift access between levels (which could typically be in the form of a convertible cupboard; provision for structural support is also needed). It should be noted that where the accommodation is all at ground level, standard M4(3A) is very easy to achieve.

14.4 The result of the policy as proposed would be the provision of up to approx. 1,200 additional homes capable of adaptation for someone with mobility problems by 2032. The form that units of accommodation may take is not specified, which allows for developers to tailor their offer to the market, whether small units suitable for individuals or couples to large units designed for extended families, whether bungalows, flats or houses, whether small groups, large blocks or individual units peppered through the site. Given that there will be over 30,000 people of 65 and over in Fylde in 2030, it is anticipated that this area of the market will be seen as an opportunity by developers.

14.5 The Viability Assessment (SD006) includes, in Appendix 1, an assessment of the actual costs involved in meeting the standard M4(3A). This is then factored into the overall assessment of viability made. The assessment as a whole concludes that the overall scale of obligations, standards and policy burdens contained in the plan are not of such a scale that they cumulatively threaten the sites in the plan to be developed viably.

15. Evidence set out in supporting text to Policy H2 states that rural areas have significantly fewer 1 and 2 bedroom homes than other parts of the Borough. Therefore whilst H2 states that 50% of developments of 10 or more dwellings should be 1-3 bed, 33% of home in rural settlements should be 1-2 bed. What is the source of this?

15.1 Table 5 on page 102 of the plan is drawn directly from ONS Census (2011) data, Neighbourhood Statistics.

15.2 The approach taken in respect of Policy H2 is explained in the response to question 12. Almost half of the overall housing need across the borough according to the SHMA is for small units of accommodation. In the rural areas the issue is compounded by the lower proportions of the existing stock that are small dwellings. The requirement for 33% of homes in rural areas to be 1-2 bedroom homes therefore reflects the particular imbalance in those areas.

16. Does the policy provide sufficient flexibility to react to market forces?

16.1 The requirements of Policy H2 do not require developers to meet the precise requirements of housing needs as set out within the SHMA; instead, the Council has put forward requirements for housing mix that are a compromise between these and the preferences of developers, which have generally been for larger units of market housing. This has been explained in more detail above in the response to question 12.

16.2 The broad mix of homes is required, but it is not specified how this should be achieved, and density may vary within the whole site, provided that the overall figure meets the 30dph requirement.

16.3 The requirements for accommodation for the elderly are not prescriptive of form and type; it is left for individual developers to decide how they will seek to meet the requirement. Given the number of elderly in the borough by the end of the plan period, it will be very much in their own interest to include accommodation that is both marketable to and meets the needs of the older generations.

Policy H4 - Affordable housing

17. It has been suggested that Policy H4 should be amended so that residential developments at the Fylde-Blackpool periphery should provide financial contributions for affordable housing to be spent in Blackpool. Has this approach been considered by the Council and is it reasonable?

17.1 The need for affordable housing within the Borough of Fylde is substantial, amounting to 249 affordable homes per annum. To achieve this number of dwellings through provision of 30% of on-site affordable housing would require delivery of over 800 dwellings per annum, which is totally unrealistic based on past completion rates. Therefore, there is an imperative to deliver affordable housing to meet the needs of Fylde Borough.

17.2 Nevertheless, the policy has been phrased in such a way as to allow the Council to continue in further discussions with Blackpool Council, under the Duty to Co-Operate, with a view that contributions could be spent in Blackpool if that were considered the most effective approach in particular cases. The policy states that “In circumstances where the Council considers that affordable housing would be most appropriately provided off-site...the Council will require...”: therefore the policy gives the Council the authority to determine whether off site contributions would be most appropriate. How the off-site contributions would be spent is not specified.

17.3 Further discussions on the issue are continuing through the leadership board of the two councils. Although there are circumstances in which the spending of contributions in Blackpool could be reasonable, it is not considered appropriate that it be formally written into policy, which would commit the Council to this action irrespective of circumstances.

18. Under tenure the policy refers to the provision of starter homes. Is this appropriate in light of the Housing White Paper?

18.1 The Housing White Paper, whilst indicating that the statutory starter homes requirement is not to be invoked, nevertheless includes starter homes within the list of models that fall within the definition of affordable housing, in the box on page 100 of the document. Once this new definition is in place, there would not be a need for the reference to “affordable housing/starter homes” in the first paragraph of the policy, as starter homes would simply be a subset of the broad suite of affordable housing products. In the section with the heading “Tenure”, the reference to the number of starter homes to meet the starter homes requirement will be superfluous. To ensure flexibility and in the light of the emerging new definition, it is suggested that the whole of the first paragraph below the heading “Tenure” is removed from the policy. In paragraph 10.64, the sentence which begins “Regulations will impose...” should be deleted as this will not now happen.

Policy H5 – Gypsies, Travellers and Travelling Showpeople’s Sites

19. In light of the new needs evidence (*Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update 2016 (EL1.002)*) what implication does this have for Policy H5?

19.1 Planning Policy for Travellers’ Sites (PPTS) requires councils to make their own assessment of need and to use this to set pitch and plot targets to address the likely needs of travellers, as defined within Appendix 1 of the PPTS, in their area. The new evidence provides the assessment of need. On page 16 of document EL1.002 it sets out that there is a current and future need of 3 pitches over the plan period. The plan allocated 5 pitches on two sites. The study identifies no need for travelling showpeople’s sites within the plan period.

19.2 However there is a need to modify the wording of the plan in order that the policy reflects the up-to-date evidence. It is proposed that the initial paragraph, including the four bullet points, is deleted in its entirety. The initial sentence of the third paragraph could be altered to read:

“Where there is need from travellers and travelling showpeople in the borough, in either case meeting the definition in Appendix 1 of the Planning Policy for Traveller Sites 2015, which is identified during the plan period and is additional to that identified by the Blackpool, Fylde and Wyre Gypsy and Traveller Accommodation Assessment Update 2016, where existing sites are insufficient to meet the need, planning permission for new Gypsies, Travellers and Travelling Showpeople’s sites will be granted where aa of the following criteria can be met: “

(to be followed by criteria a to j as at present).

Policies H6 and H7 – Homes in the Countryside

20. Do these policies apply to the countryside, Areas of Separation and the Green Belt? Is this clear within the policies?

20.1 The countryside area on the proposals map, relating to Policy GD4, is shown as green colouring. The Areas of Separation and Green Belt are shown by different forms of hatching applied over this green. Therefore, Policies H6 and H7 apply equally to Green Belt and Areas of Separation as they do to other areas only designated as Countryside Area.

20.2 In the case of each policy, as the plan is designed to be read as a whole, the general requirements of Policies GD2, GD3 and/or GD4, as appropriate, will continue to apply, in addition to the requirements of Policies H6 and H7.

21. Is Policy H6 consistent with paragraph 55 of the Framework?

21.1 Paragraph 55 sets out examples of special circumstances in which isolated new homes in the countryside could be acceptable. In the particular case of essential accommodation for a rural

worker, Policy H6 sets out criteria a. to d. in order to further specify the special circumstance that would justify the exception to the general policy restriction. These are the essential need for the permanent attendance of the worker on site, the absence of other existing accommodation that could meet the need, the ability of the business to support the employment of the worker and the suitability of the size and siting of the proposed dwelling. These criteria are intended to help achieve the objectives of paragraph 55 of the Framework.

21.2 In the case of a building of exceptional design, a criterion is added to those in the Framework, to protect the local environment.

21.3 The third category of isolated new homes that would be acceptable under Policy H6 combines the example in the Framework of the optimal use of the heritage asset with that for re-use of redundant or disused buildings. For clarity and consistency with the Framework, these could be separated, by the following change:

3. Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or

4. Where the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting

if considered necessary.

22. Is the increase in size of a replacement or extended home by no more than 33% of the ground floor area of the original home justified and based on robust evidence?

22.1 Over-large and poorly designed extensions and outbuildings can adversely impact upon the openness and attractiveness of rural areas. In addition, the replacement of smaller properties with significantly larger dwellings diminishes the supply of smaller properties available for purchase and so the range of sizes of dwellings available for purchase in the rural area may be limited. The policy is proposed in order to prevent grossly disproportionate dwellings resulting from either the extension or replacement of original small and medium sized homes in the countryside. Monitoring has revealed many examples where the Council has been unable to resist development, even with the previous Local Plan policy, that have resulted in harmful highly prominent impacts in the countryside, as well as a loss of smaller homes in the rural area. Between 2003 and 2016, 51% of completions for rural dwellings in the countryside were for dwellings with 4 or more bedrooms. As the erection of new dwellings in the countryside is generally restricted, the significant extension of properties is eroding the stock of smaller properties available for purchase by people on a limited budget who may have a need to live in the rural area. Policy HL4 of the existing Fylde Borough Local Plan seeks to restrict the volume of new extensions or replacement dwellings to between 25-33% of the original dwelling. The proposed restriction of the proportional increase over the footprint of the original dwelling is intended to simplify implementation of this policy. Whilst the policy also requires

any replacement or extension to a property to be of a suitable design, the application of a restriction based upon increased footprint would also assist in preventing, for example, inappropriate flat roofed extensions where the volume of the proposed roof space would exceed that set out in the policy. The proposed policy will provide a means of ensuring that the particular impacts of increasing scale will be considered as well as the more generic impacts of design and effect on character are considered. The two elements of the policy are intended to be considered in tandem, rather than as wholly discrete criteria, in order to develop effective solutions for sensitively extending homes in rural areas. The policy would allow the reasonable expansion of existing homes whilst maintaining a wide choice and mix of homes in the rural area in line with Paragraph 50 of the Framework.