

INDEPENDENT EXAMINATION OF THE FYLDE COUNCIL LOCAL PLAN

INSPECTOR'S QUESTIONS (Stage 3 Hearing Sessions)

Version 1 – 6 November 2017

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Introduction

Following previous Stage 1 and 2 hearings and the Council's consultation on additional evidence on specific matters carried out between 3 August and 14 September 2017, I now propose a short round of **STAGE 3 HEARINGS**.

The purpose of these hearings is to discuss any matters I consider require further discussion relating to the Council's recent evidence (EL7.002). Therefore only the following questions will be open for discussion at the hearings, unless I decide otherwise. This inevitably involves revisiting some previous matters and issues. Nevertheless I do not intend to open up discussions on any other previous matter, issue or question or allow repetition of previous arguments, unless I consider it necessary to aid discussions. Similar to stages 1 and 2 there will be no discussion of omission sites.

These questions should be read in conjunction with the **Stage 3 Guidance Note** which sets out further information about the examination, hearings and format of any further written statements.

Session 1

Objectively assessed housing and economic development needs

Context

The SHMA Addendum 3 (part of EL7.002) identifies the OAHN figure for Fylde as a range between 410 and 430 dpa. In summary this is set out in the document as follows:

- The 2014-based sub-national household projections (SNHP) (issued in July 2016) figure of 274 dwellings per annum (dpa) (following the application of a vacancy rate) is the starting point for assessing need.
- The application of an adjusted demographic projection, to reflect a longer-term growth scenario (12 years) and to make an allowance for household

formation rates of younger households, takes the figure of need to 351 dpa (an increase of 77 dpa).

- Future jobs growth between 2015 and 2032 is forecast to be in the range of 55-91 jobs per year. No allowance is made for the Enterprise Zones. This results in an uplift of between 57 and 81 dpa. This takes the figure of need to between 408 and 432 dpa.
 - To help address affordability issues a modest uplift applied to the household projection is justified. A 10% adjustment to the 351 dpa would result in a need for 386 dpa. This is below the uplift for jobs growth.
 - The Council has rounded the OAHN to a range of 410-430.
1. Is the OAHN range justified and supported by robust evidence? In particular:
 - a. It has been suggested that due to the affordability ratio within the borough the market uplift should be increased to 20%. Is this higher level supported by evidence?
 - b. Some market signals have not been updated. Are the previous assessments for these still appropriate and based on credible evidence?
 - c. Some representors suggest that large employers in the area are contracting, which would result in a lower housing need. Is this the case and does the evidence support a lower jobs growth forecast?
 - d. Other representors suggest that an allowance for additional jobs growth at the Enterprise Zones should be taken into account in the assessment. Does the evidence support such an allowance? Does the Council's economic strategy rely on growth at the Enterprise Zones? Are the economic and housing strategies aligned within the plan?
 - e. Is a further upward adjustment for the delivery of affordable housing justified?
 2. Does the updated jobs growth assessment have any implications for the overall economic development strategy set out within the plan?
 3. In relation to gypsies, travellers and travelling showpeople, are the housing needs of those people who do not meet the new definition set out in Annex 1 of the national Planning Policy for Traveller Sites included in the SHMA assessments?

Session 2

Housing requirement

1. Based on the submitted new evidence the Council is proposing that the housing requirement for the plan period would be 415 dpa (8,715 dwellings) rather than the 370 dpa currently set out within the plan. On what basis has 415 dpa been determined as the housing requirement figure? Does the evidence support a lower or higher figure?

2. Will this figure ensure that the plan meets the full objectively assessed housing needs identified in the SHMA Addendum 3?

Session 3

Housing – Site allocations, 5 year housing land supply and the settlement hierarchy

1. In the light of the Council's updated site allocations and site delivery methodology:
 - a. Is the amount of housing proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?
 - b. Are the Council's revisions to the methodology for site delivery and adjustments to the build out rates reasonable and justified?
 - c. Is the housing trajectory realistic for each updated allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?
2. It has been suggested that the 10% non-implementation rate should be applied to all sites with planning permission, not just small sites: is this approach justified? What implications, if any, would this have on housing supply, specifically the 5 year housing land supply, if it was applied across the board? Does evidence support the use of a higher 20% non-implementation rate for small sites?
3. In my letter of 3 July 2017 I asked the Council for further clarification on their preferred approach to delivering the identified shortfall in housing delivery using the Liverpool method (across the plan period). In light of the Council's evidence on bringing sites forward for delivery and the availability of additional sites, is the use of the Liverpool method justified?
4. The Council in EL7.002 confirm that they have a 5 year housing land supply (5YHLS) whether Sedgefield (5.1 years) or Liverpool (6.4 years) is used. A recent Council planning policy statement (dated September 2017) produced for an appeal (PINS ref: APP/M2325/W/16/3174723) indicates that the supply is now 4.9 years using the Sedgefield approach or 6.2 years using the Liverpool method. Can the Council comment on their update and its implications for housing land supply within the plan? Will the housing provision have a reasonable prospect of delivering a 5 year housing land supply at the point of adoption of the plan?
5. In the Settlement Hierarchy Note (July 2017) (part of EL7.002), the Council concludes that there is no justification for altering the positions of Wrea Green and Elswick within the settlement hierarchy. Does the evidence support this approach?