

Fylde Council Local Plan Examination

Stage 3 Hearing Sessions

Session 2: Housing Requirement

12th/13th December 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd. concerning Stage 3, Session 2 (Housing Requirement) of the Fylde Local Plan Examination.
2. The submission is made with respect to the Inspector's *Questions* (V1, 6th November 2017) and supplements the submissions previously made to the Stage 1 Local Plan hearings in March 2017; and subsequent additional representations lodged with Fylde Council on the *Consultation of Additional evidence in Support of the Fylde Local Plan to 2032* (August 2017) (**EL7.002**). Metacre's submissions should therefore be read together and in their entirety.
3. This submission is concerned with:
 - **Session 2, Questions 1 and 2:**

Question 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?

4. It is unclear to Metacre how Fylde Council has determined that the OAN figure should be **415** dpa from the revised range of **408 – 432** dpa recommended in Table 6.1 of *Fylde Addendum 3: Analysis of the OAN in Light of the 2014-based SNPP and SNHP* (May 2017).

5. The Council purports to have arrived at the **415** dpa figure on the basis of a ‘planning judgement’. The *Additional Evidence Consultation* document does not however justify fully why this is the appropriate point within the proposed range to pick.
6. At paragraph 2.22 the Council points to two factors in reaching its conclusion:
 - the reasoning set out in Annex 1 (the *Addendum 3* and *Independent Economic Assessment* evidence); and
 - that the proposed housing requirement of 415 dpa “*represents a step change in historic housing delivery and affordable housing delivery*”.
7. We turn to each factor in turn below.
8. The *SHMA Addendum 3* report concludes an OAN range of **408 – 432** dpa at Table 6.1 with the recommendation at paragraph 6.38 of that Report that the selected OAN should be at the higher end of the range:

“Whilst a range of OAN for housing has been concluded – associated with the range of job growth considered reasonable within the Independent Economic Assessment – it is recognised that this report concludes that it is ‘expected...that the likely level of employment growth will be at the upper end of this range’. It is therefore considered that the full need for housing will be more closely aligned with the upper end of the identified OAN range”. [Our emphasis].
9. The selection of an OAN at the top of the range is also supported by *Addendum 3*’s statement at paragraph 6.47 that worsening affordability and the need to deliver more affordable housing would also support the selection of an OAN at the high end of the range:

“It is considered, however, that in the context of a recognised significant need for affordable housing that this provides further support for placing greater emphasis on the upper end of the OAN range”.
10. *Addendum 3* concludes that the OAN would lead to an approximate doubling of the historic rate of development (210 net dpa 2003 – 2016); but this fails to

account for the fact that delivery in the past has been suppressed by the failure to provide a Local Plan with sufficient and available housing land allocations.

11. Metacre raised concerns on the artificial suppression of housing delivery rates in their Local Plan EiP Hearings Matter 1 submission (paragraph 42 onwards refers).
12. The failure to plan effectively for sufficient housing sites and land has, over a significant time period, been a substantive reason why historic delivery rates are lower than the OAN levels now anticipated. The comparison of historic delivery rates with the proposed OAN is not therefore, in Metacre's view, a realistic justification for setting the figure at **415** dpa. The provision of sufficient land and sites over time would have resulted in a higher average annual completion and delivery rate than that achieved. Comparison of the proposed OAN with the achieved development rate is artificial.

Question 2

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

13. The Council's approach, would, over the 21 year plan period 2011 – 2032 result in potentially some **315 dwellings less** than if the OAN was at the top of the range (in accordance with the *Addendum 3* recommendations).
14. Metacre consider that the proposed **415** dpa OAN is not consistent with the NPPF at paragraph 47 which seeks a significant boost to the housing supply, nor is it a sufficiently positive or proactive approach to ensure housing needs are met. The Council's selected OAN is not therefore consistent with national policy.
15. Despite the clear recommendation and advice in *Addendum 3*, the Council has selected **415** dpa OAN as paragraph 2.20 of the *Additional Evidence Consultation* document records. This is at the low end of the proposed range and (even setting aside the concerns raised about the overall OAN range) does not represent a positive or proactive planning response to resolving long-term

housing requirements, improving the economic sustainability of the Borough (from being a net workforce importer) or helping meet fundamental, acute and worsening affordability issues.

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