



HALLAM LAND MANAGEMENT LTD

FYLDE COUNCIL LOCAL PLAN

EXAMINATION HEARING STATEMENT

SESSION 1: OBJECTIVELY ASSESSED HOUSING AND ECONOMIC DEVELOPMENT NEEDS

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1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Hallam Land Management (HLM) to make representations to the Fylde Local Plan Stage 3 Examination Hearings. HLM have land interests within the Fylde District.
- 1.2 This statement provides a response to the questions set forward for Session 1: Objectively assessed housing and economic development needs.

2. SESSION 1: OBJECTIVELY ASSESSED HOUSING AND ECONOMIC DEVELOPMENT NEEDS

Question 1: Is the OAHN range justified and supported by robust evidence?

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 ratio supported by evidence?

- 2.1 Determining the OAHN should be centred around taking a positive approach to planning for housing in Fylde. The level of housing requirement must be set at a level that reflects the market signals of the borough as well as the borough's demographic need.
- 2.2 The market signals indicate that there is a need for an uplift in the demographically based figure. From looking at the evidence provided in the Fylde Addendum 3: Analysis of the OAN in light of the 2014-based SNPP and SNHP (May 2017), the mean and lower quartile sales prices have increased over the period of 2001 – 2016. The mean sales prices have increased by 125% and the lower quartile house prices have increased by 147% over this period. Fylde experienced the largest increase in comparison to the other boroughs in the HMA (Preston, South Ribble, Wyre and Blackpool). In addition, the affordability ratio has also increased by 82% over the period 2001 – 2016 from 3.57 in 2001 to 6.50 in 2016.
- 2.3 In order to respond to the above evidence, Addendum 3 suggests that the application of a 10% adjustment should be applied which HLM fully support. A 10% adjustment is considered to represent a reasonable upper limit to any such adjustment in the context of the updated market signals evidence.

b) Some market signals have not been updated. Are the previous assessment for these still appropriate and based on credible evidence?

- 2.4 It is noted that some of the market signals data is up to date; house prices, rents and affordability, however, overcrowding and concealed families' data only goes as far as 2011. Having said that, the data is taken from census data and therefore we accept that this is a credible data source and evidence.

c) Some representors suggest that large employers in the area are contracting, which would result in lower housing need. In this the case and does the evidence support a lower jobs growth forecast?

- 2.5 HLM have no comment to make on this issue.

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?

- 2.6 The proposed Enterprise Zones form a key part of the economic growth strategy for the borough and therefore the additional housing should be delivered to encourage, promote and support this strategy.

- 2.7 The Blackpool and the Fylde Framework for Inclusive Growth and Prosperity highlights the genuine opportunities to generate thousands of new jobs in the decades ahead, delivering the economic growth needed to close the performance gap. These opportunities include the delivery of three Enterprise Zones at Blackpool Airport, Hillhouse (Fleetwood) and Warton (Lancashire Enterprise Zone).
- 2.8 Throughout the Local Plan preparation, the role of the Enterprise Zone has been clearly set out and their importance has been highlighted as a key mechanism to bolster the economy. In particular the Lancashire Enterprise Zone in Warton is identified as having the potential to improve the economic and physical connectivity of Fylde. Across the two sites; Samelsbury and Warton, the EZ will directly create up to 6,000 highly skilled jobs and a further 5,000 to 7,000 will be created within the local supply chain.
- 2.9 National guidance confirms that housing strategies within Local Plan must take account of economic aspirations, with paragraph 158 of the NPPF stating that:
- 'Local Planning Authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals'.*
- 2.10 The NPPG also states at paragraph 2a-018-20140306:
- 'Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses'.*
- 2.11 Admittedly, there is a degree of uncertainty from the Council as to when the three EZ's will be delivered, however, at present, there is a complete disregard for any potential job growth, which raises some serious concerns. Indeed, the Local Plan should aim to facilitate such growth and target new homes where jobs are expected to be delivered. There needs to be a certain degree of acceptance that the Enterprise Zones will come forward at some point during the plan period, and consequently, the OAHN should appropriately reflect this.
- 2.12 Currently, there is a level of uncertainty as to how the Council will respond if the EZ's come forward during the plan period, as no provision has been made for this scenario. If the Council are unable to provide sufficient housing to support the growth of these Enterprise Zones during this plan period, there is a concern that this will slow down growth and discourage further investment.
- 2.13 For a Local Plan to be positively prepared, the housing and economic growth of the borough appropriately aligned. The OAHN of the borough should correspond with the level of growth proposed rather than working retrospectively. To plan for housing, without taking into account the employment growth in the borough and vice versa, is unsound and contrary to the vision and aspirations of the borough.

2.14 The assumptions in the AMION report (May 2015) create a need for between 410 and 430 dpa, concluding that the growth should be at the upper end of this range. The Council's suggested OAHN of 415 dpa is not at this upper end but below even a mid-point figure. If the potential of the Enterprise Zones was taken into consideration and both the housing and economic strategies were aligned, this would lead to an OAHN of between 440 – 450 dpa.

e) Is a further upward adjustment for the delivery of affordable housing justified?

2.15 Annex 1 of the Objectively Assessed Housing and Economic Development Needs considers the issue of affordable housing. The need for affordable housing is acknowledged to be 249 homes per annum (this figure has been taken from Addendum 1 of the 2013 SHMA). It is assumed that 30% of the housing requirement will be affordable housing and as such, this would suggest that between 120 and 130 affordable homes could be delivered per annum. Indeed, this presents a shortfall of between 119 and 129 affordable homes per annum.

2.16 Despite this shortfall of between 48% and 52% of affordable homes, the Council have not made any adjustments to reduce the gap between the affordable housing need and the affordable requirement.

2.17 The Council's position, as set out in the Consultation on Additional Evidence Document, states that whilst it is apparent between 120 and 130 affordable dpa will not meet the need for affordable housing in full, it will make a significant positive contribution. The Council believe that meeting the full calculated need for affordable housing is not justifiable or realistic.

2.18 As stated in the NPPG, paragraph 29, ref ID: 2a-029;

*'The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. **An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes**.' (my emphasis)*

2.19 As such, HLM recommends that the Council should increase the market housing requirement beyond the current OAHN in order to provide a greater number of affordable dwellings, which will significantly reduce the existing shortfall.

Question 2: Does the updated jobs growth assessment have any implications for the overall economic development strategy set out within the plan?

2.20 HLM have no comments on this issue.

Question 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?

2.21 HLM have no comments to make on this issue.