



Gladman Developments Ltd

Fylde Local Plan Examination

Stage 3 Hearing Statement

Session 1 – Objectively Assessed Housing and Economic Development Needs

Q1. 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 the evidence?

1.1 Gladman have no specific comments on this question.

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

1.2 Gladman have no specific comments on this question.

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

1.3 Gladman have no specific comments on this question.

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 with the plan?

1.4 Whilst there remains concerns over the timing, scale and additionality of new employment opportunities at the Blackpool Airport and Warton Enterprise Zones, it is clear that these two initiatives have the potential to make a significant contribution to the authority's economy. In this regard, the Council's updated Independent Economic Assessment (EL7.002) notes how past rates of employment growth in the borough, when combined the two Enterprise Zone sites, point to a

need to plan for future job growth at the upper-end of the 55 – 91 job per annum range that is now suggested by the latest employment modelling prepared for the Council by Amion Consulting.

1.5 There is a need to ensure that the Council plans for sufficient housing development to support this level of economic growth, and that the supply of future housing land does not act to inhibit the future prosperity of the Fylde authority area. In this respect, the Council's SHMA Addendum 3 (EL7.002) notes how an OAN figure of 397 - 408 dpa would be required to align with the bottom end of the authority's job growth range, whilst 421 – 432 dpa would be needed to provide a sufficient labour force to support the creation of 91 jobs per annum over the remainder of the Local Plan period.

1.6 Consequently, the Council's own evidence base continues to suggest that an OAN figure of 415 dpa would be insufficient to support the future economic potential of borough. More specifically, it advocates a housing target that would align with the top of the OAN range of 410 – 430 dpa now suggested by the Council's latest SHMA Addendum 3 work.

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

1.7 The PPG on Housing and Economic Development Needs Assessments makes clear that an increase in the total housing figure included in the Local Plan should be considered where it could help deliver the required number of affordable homes in an authority (PPG ID: 2a-029).

1.8 In this regard, the Council's SHMA Addendum 3 reiterates how there would be a need to deliver in excess of 800 homes per annum to meet Fylde's affordable housing needs in full, whilst at a rate of 30% affordable housing provision, an OAN figure of 415 dpa would result in the delivery of just over half of the 249 affordable units that are required in the borough annually.

1.9 Whilst noting that this level of provision would represent a welcome uplift on historic completions of affordable housing within the authority area, the scale of the borough's affordable housing needs lends further weight to the case for planning for a future housing target that falls at the top of the Council's identified OAN range.

Q2. Does the updated jobs assessment have any implications for the overall economic development strategy set out in the Plan?

1.10 Gladman have no specific comments on this question.

Q3. 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?

1.11 Gladman have no specific comments on this question.

Session 2 – Housing Requirement

Q1. 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?

2.1 Whilst Gladman welcome the Council's decision to revisit its proposed housing target, we submit that a figure of 415 dpa is still too low to meet Fylde's full objectively assessed needs. This figure sits below the mid-point of the 410 – 430 dpa OAN range now suggested by the Council's updated evidence base, and would appear to be inconsistent with securing sufficient housing to support the future economic needs of the borough area.

2.2 Gladman are unclear as to why a revised target of 415 dpa has been selected by authority, when the Council's own evidence base suggests that a housing requirement at the 'upper-end' of its revised OAN range should be pursued through the Local Plan. Pursuing a higher housing requirement would provide more opportunity to address Fylde's affordable housing needs, and would provide greater scope to support future economic developments at the Blackpool Airport and Warton Enterprise Zone sites.

2.3 Increasing the Council's housing target to a minimum of 430 dpa, to align with the top of the Council's revised OAN range, would require a uplift of just 15 dpa, or 315 dwellings in total over the period 2011 – 2032. It is unclear why the authority have neglected to plan for this higher figure, in light of the marginal increase in overall housing provision this would require. The Council have provided no robust evidence to justify their decision to select a target of 415 dpa, or departing from the advice of their own consultants.

2.4 In accordance with paragraph 47 of the National Planning Policy Framework (The Framework), the Council should identify an appropriate housing target for the borough on the basis of an independent and objective assessment of Fylde's future housing needs. It should not seek to predetermine or overlook the findings of this assessment, in preference for selecting a housing target that it has already decided to be deliverable.

Q2. Will this figure ensure that the plan meets the full objectively assessed housing needs identified in the SHMA Addendum 3?

2.5 In order to meet Fylde's full objectively assessed needs and be found sound at Examination, Gladman submit the overall housing requirement should now be revised to a conservative minimum of 430 dpa, equivalent to a requirement to provide 9,030 dwellings over the period 2011 – 2032. This would be consistent with the findings of the Council's evidence base, and would ensure the

Local Plan is positively prepared, taking account of the borough's objectively assessed development needs.

- 2.6 Gladman note that since the conclusion of the Stage 2 Examination hearings and the publication of the Inspector's previous conclusions on the Duty to Cooperate, Wyre Borough Council has published its emerging Local Plan for Regulation 19 consultation. This identifies a shortfall of 1,356 dwellings against the authority's full objectively assessed needs that will need to be addressed through joint working with neighbouring authorities, including Fylde.
- 2.7 In light of the clarification that has now been provided on Wyre's unmet housing needs, there may be a requirement to re-consider how this issue is addressed through Fylde's current Local Plan process. There may also be a need to consider how it will influence the requirement for a future Local Plan review.
- 2.8 Accordingly, Gladman submit that the Council must now take proactive steps to identify sufficient housing sites to ensure the delivery of a minimum OAN of 430 dpa, or 9,030 homes in total, over the Local Plan period.

Session 3 – Housing – Site Allocations, 5 Year Housing Land Supply and the Settlement Hierarchy

Q1. In 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?**

3.1 Gladman are aware that other members of the development industry have provided detailed representations on the updated forecasts and delivery assumptions that have been applied to the Council’s housing trajectory.

3.2 Whilst we have no further comments to make on these questions, or to supplement our latest representations on the authority’s Additional Evidence consultation in September 2017, we endorse the concerns that have been raised by other parties in relation to the vulnerability of the Council’s housing land supply position, in the short term and over the duration of the emerging Local Plan period.

Q2. 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?

3.3 Notwithstanding any further changes that may be required to the delivery assumptions that underpin the Councils’ housing land supply work, Gladman note that the Council’s five year housing land supply would reduce to **5.81 years** when a 10% non-implementation allowance is applied to the authority’s claimed supply of deliverable housing sites (3,710 - 371 = 3,339), and the Liverpool approach is used to address the borough’s current housing land supply shortfall against an OAN of 415 dpa.

3.4 The Council’s claimed supply would further reduce to **just 4.59 years** when the applying the same assumptions, and using the Sedgfield approach to dealing with the Council’s current housing land supply shortfall over the next five years.

- 3.5 As set out within our responses to Questions 2 and 3 above, Gladman believe that a conservative housing target for the Fylde borough area would be a minimum of 430 dpa, to align with the upper end of the authority's revised OAN evidence base.
- 3.6 When using this figure as the basis for the Council's five year housing land supply assessment, alongside a blanket 10% non-implementation allowance, the Councils' five-year housing land supply would reduce to **5.57 years** under the Liverpool methodology, and **4.36 years** using the Sedgefield approach.
- 3.7 Whilst not a specific requirement of national planning guidance, Gladman believe that applying a 10% non-implementation allowance or lapse rate to the Council's claimed supply of deliverable housing sites would introduce a greater degree of realism to the authority's housing land supply calculation, reflecting the likelihood that all sites, and not just small scale opportunities, have the ability to come forward at a slower rate than expected, or deliver fewer homes than originally envisaged.

Q3. 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?

- 3.8 Whilst national planning guidance is not prescriptive over which approach local planning authorities should use to address a housing land supply shortfall, there is a clear preference in both the Framework and PPG on Housing and Economic Development Needs Assessment to make good any undersupply in housing provision as soon as practicably possible.
- 3.9 This would accord with the Framework's aim of delivering a step-change in housing delivery, and the requirement for local planning authorities to boost significantly the supply of housing (paragraph 47). It would also align with the requirements of the PPG, which advocates that Councils should seek to deal with any undersupply via the 'Sedgefield' method, to achieve these key objectives for the planning system:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to Cooperate" (PPG ID 3-035)

- 3.10 Failing the to address the undersupply of housing that has already accrued in the borough within five years, without good reason, would only serve to create further barriers for households looking to access the housing market, whose needs will continue to go unmet.

3.11 It would be particularly unjustified where there are additional suitable housing sites that could readily be developed and come forward in the short term to meet Fylde's full objectively assessed needs.

Q4. 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?

3.12 Whilst this is principally a matter for the Council to respond to, the updated supply figures contained within the Council's September 2017 Planning Policy Statement further emphasise the fragility of the Council's five-year housing land supply position.

3.13 The effect of applying a blanket 10% non-implementation rate to the Council's housing land supply assessment, and using a minimum OAN of 430 dpa as the basis for the calculation, would only serve to further reduce the Council's land supply under a Liverpool scenario, and exacerbate the authority's five-year shortfall when Sedgefield is applied.

3.14 The updated land supply positions reported by the Council's September 2017 Planning Policy Statement lend additional support to the case for identifying additional housing sites in the Fylde borough area, that have the ability to come forward in the short-term and deliver further housing in sustainable locations to meet the authority's full objectively assessed needs.

Q5. 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?

3.15 Gladman have no specific comments on this question.