

## **Matter 2 Housing**

***Issue 2 – Have the revisions to Policies DLF1 and H1 and relevant supporting text, in relation to housing needs and the housing requirement, been positively prepared and are they justified, effective and consistent with national policy? Is Policy H2 consistent with national policy?***

- Q1. Policy DLF1 and its supporting text, in the Partial Review, seeks to set out the minimum housing requirement figure as a range of 6,895-8,715 dwellings for the plan period. Policy H1 and its supporting text, as proposed, seeks to set the housing requirement as 415 net new homes per annum between 2011 and 2019, and sets a range of 275-415 net new homes per annum between 2019 and 2032. The Partial Review also includes revisions to Paragraphs 9.13-9.19 on housing provision. My queries are:**
- a. Is the assessment of housing need, using the standard method, consistent with national policy and does it accord with the methodology set out in the Planning Practice Guidance? Are there any 'exceptional circumstances' to justify an alternative approach?**
1. The Fylde Local Plan Partial Review was submitted on 21<sup>st</sup> October 2020. To be entirely consistent with the PPG the methodology should have utilised the household projections for the 10-year period from 2020 to 2030, this would have been in line with the requirement to use the current year as the starting point. It should have also used the median workplace-based affordability ratios from 2019, which have been available since 19<sup>th</sup> March 2020. However, these amendments to the methodology would have made very little difference to the overall conclusion of the LHN calculation, with a figure of 272dpa being the outcome instead of 275dpa.
  2. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It is also noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. National policy identifies that the Standard Method provides a minimum starting point, and that there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG<sup>1</sup> states that these circumstances can include growth strategies for the area; strategic infrastructure improvements; taking unmet need from neighbouring authorities; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.
  3. There have been significant infrastructure improvements in Fylde and the surrounding area, for example the Preston Western Distributor and the A585 Windy Harbour to Skippool improvement scheme. The Preston Western Distributor is scheduled to open early in 2023 and is intended to promote new housing and business development in the area, while increasing capacity on the existing local road network. The A585 Windy Harbour to Skippool improvements are expected to remove the current bottleneck at Five Lane Ends and give the opportunity to improve the A585 Mains Lane/A588 Shard Road junction. The A585 DCO on the 9th April 2020 was granted consent by the Secretary of State.

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<sup>1</sup> PPG ID: 2a-010-20190220

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4. The Fylde Coast SHMA (2014) identified that Fylde, Wyre and Blackpool form a single housing market area (HMA). The Wyre Local Plan was adopted with a housing figure below the OAN and therefore created a shortfall of homes with the HMA of 380 dwellings. Blackpool has not identified any shortfall in their adopted Plan. There is therefore, an unmet need to be met in a neighbouring authority.
5. MHCLG statistics shown in Table 1 below, highlight that 1,926 dwellings have been built over the last five years, at an average of 385dpa, with the numbers increasing year on year, this suggests that the housing need is above the LHN identified by the standard method. The Fylde Local Plan was only adopted in October 2018, so it is likely that the higher figures seen at the end of the period would continue as allocations are brought forward.
6. The Fylde SHMA Addendum 3: Analysis of the OAN using the 2014-based SNPP and SNHP (Turley, May 2017) identifies an OAN of between 410-430dpa. This was assessed as part of the Examination of the Fylde Local Plan (December 2017) and the Inspector considered that a housing requirement of 415dpa was sound (Inspector's Report, September 2018). This evidence and the assessment through the examination process suggest the housing need is higher than the LHN identified by the standard method.
7. It is noted that the 2018-based household projections are now available, and as a comparison, between 2020 and 2030 the 2014-based projections show an increase of 2,499<sup>2</sup> whilst the 2018-based projections show an increase of 4,280<sup>3</sup>.

**b. Is the inclusion of a minimum housing requirement figure as a range justified and effective?**

8. Policy DLF1 proposes to provide sites for a minimum of 6,895-8,715 new homes. Whilst Policy H1 looks to set and apply a housing requirement of 415 net homes per annum for the period 2011-2019 and a housing requirement of 275-415 net homes per annum for the period 2019-2032.
9. The HBF does not consider that the policy is clearly written and unambiguous as required by the NPPF<sup>4</sup>. Providing the housing requirement as a range does not provide clarity and it may not always be clear how this should be considered as part of the decision-making process. The HBF is concerned by the use of a housing range, which although the text in Policy DLF1 states 'a minimum of', still seems to suggest that the top end of the range is a cap and this could limit the development of homes. This is particularly notable in Policy H1 where the word 'minimum' has in fact been removed. The HBF does not consider that this is line with national policy which looks to support the Government's objective of significantly boosting the supply of homes. It is also not in line with the NPPF<sup>5</sup> which states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional*

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<sup>2</sup> 2014-based household projections 2020 – 37,454, 2030 – 39,953

<sup>3</sup> 2018-based household projections 2020 – 38736, 2030 - 43016

<sup>4</sup> Paragraph 16 of NPPF 2019

<sup>5</sup> Paragraph 60 of NPPF 2019

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*circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'.*

10. As set out in response to the previous question, the HBF does not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement for Fylde, it is evident that the actual housing requirement should be higher. The HBF does not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and does not consider that this would be consistent with the NPPF requirement to support the Government's objective to boost the supply of homes. The HBF considers that the clarity of this policy could be improved, and recommend that the range is removed, and that the housing requirement is clearly set out as one net minimum figure in both policies DLF1 and H1. Based on the PPG guidance on the circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates, the HBF would suggest that there is clear evidence that the LHN in Fylde is clearly significantly above the minimum figure provided by the standard method.

**c. Why is 'minimum' proposed to be deleted from Policy H1 criterion a) in relation to the housing requirement figure? Is this consistent with Policy DLF1?**

11. The HBF considers that 'minimum' should not be deleted from Policy H1, and does not consider that the deletion is consistent with Policy DLF1 or the Government's objective to boost the supply of homes.

**d. Overall, are proposed Policies DLF1 and H1 soundly based? Are they clearly written and unambiguous in accordance with paragraph 16 d) of the Framework, and supported by effective explanatory text?**

12. The HBF does not consider that Policies DLF1 and H1 are soundly based for the reasons set out previously. The HBF also does not consider that the policies are clearly written or unambiguous and does not consider them to be in line with the NPPF<sup>6</sup>.

**Q2. What effect, if any, does a minimum housing requirement as a range of 6,895-8,715 net new homes during the plan period, have on the ability of the Council to:**

- a. deliver affordable housing to meet identified needs; and**
- b. achieve its economic ambitions to deliver growth, specifically employment provision and jobs, in line with the overall strategy for the Borough?**

13. The HBF is concerned that the range of homes may reduce the number of homes that are delivered, particularly as the Council are unlikely to take action to assist in the delivery of homes, if the number of homes delivered achieves the bottom end of the range and does not reach the top end of the range. This reduced delivery of homes is likely to mean that less affordable homes are delivered and therefore may not lead to sufficient homes being delivered to meet identified needs. This reduced delivery of homes may also make it harder for the Council to achieve its economic ambitions and to deliver the growth that is set out in the Plan.

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<sup>6</sup> Paragraph 16(d) of NPPF 2019

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- Q3. The National Planning Policy Framework (2019) definition for older people differs from that in the 2012 version in that it now also includes people 'approaching retirement age'. Is Policy H2 and its supporting text, which includes specific requirements for '*Specialist Accommodation for the Elderly*', consistent with this revised definition? Specifically, do the criteria in the policy for defining what development type is '*purpose-built 100% specialist accommodation for the elderly*', accord with national policy and the guidance set out in the Planning Practice Guidance?**
14. The HBF considers that Policy H2 is no longer in line with NPPF definition for older people. The HBF are concerned that the limited definition of what can be considered to be specialist accommodation set out within policy H2 is no longer appropriate and does not accord with the NPPF and PPG which provide both a wider definition of 'older people' and of the types of housing needs they may have.