

**Fylde Local Plan Partial
Review Examination
Matter 2
Housing
Matter 3
Other revisions
Hearing Statement
On behalf of Home Farm Ltd**

1.0 INTRODUCTION

- 1.1 Cassidy + Ashton are retained by Home Farm Ltd [HF].
- 1.2 In respect to the Local Plan Review, HF are promoting the allocation of additional land at Lytham St Annes, one of the Key Service Centres within the Borough. Details of the promoted site and adjacent land available are set out as Appendix CA1 [a and b]. The land set out within the red line is the subject of a current planning application ref. 16/1025.
- 1.3 The format of this statement follows the Inspector's own Matters Issues and Questions dated 29th January 2021. Notwithstanding the Council's previous calculation of housing supply, we have taken the opportunity to review some of the commitments and provide updates on these in Appendix CA2.
- 1.4 Overall it is our position that due to the impacts of Covid and the volatility of the economy there is likely to be a shortfall in housing supply within the next five years. When the need to provide for Wyre's a shortfall is added to this, there is a requirement to identify additional land for development within Fylde. The most suitable site for development in the whole of the Borough is the land shown at Appendix CA1(a) which is in a sustainable location as part of the largest settlement within the Borough. It will also assist in the delivery of the Heyhouses to M55 Link Road but is also capable of early development through access initially taken from the south east corner of the site. It is genuinely available to make a significant contribution of up to 500 dwellings to the housing land supply within Fylde.

2.0 INSPECTOR'S QUESTIONS

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?**

2.1 It is acknowledged that the NPPF expects plan making authorities to use the standard method for assessing local housing need, although it is also noted that the standard method simply identifies a minimum annual housing need figure. It does not produce a housing requirement figure. However, it also noted that use of the standard method is not mandatory and in this respect it is worth noting that neighbouring authorities have not universally applied the standard method in their own calculations. As an example Blackpool have relied upon the housing need calculated in their Core Strategy on the basis that:

3.4 *The Core Strategy figure reflects the assessed needs of the future population, the level of housing considered realistic to deliver in the Borough and alignment of housing growth to economic prosperity. It also supports the Government's objective of significantly boosting the supply of housing [Blackpool Local Plan, Housing Topic Paper, January 2021][Appendix CA3].*

2.2 The PPG provides examples of exceptional circumstances where a divergence from the standard method is appropriate. These include:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or

- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

2.3 In addition to this, the PPG states:

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

2.4 In terms of growth strategies Fylde works with Blackpool and Wyre and alongside the Lancashire Enterprise Board in promoting economic growth. This is reflected by their involvement in the Blackpool Airport Enterprise Zone, which is a joint initiative between Blackpool and Fylde and seeks to create up to 5,000 jobs over the next 25 years, and the Warton element of the Lancashire Enterprise Zone [Appendix CA4]. This level of growth is not reflected in the housing proposals for Fylde and reliance on the standard method would be detrimental to this target.

2.5 Furthermore, the approval and proposed start in 2021 of the Heyhouses-M55 Link Road which itself is intended to improve connectivity for Lytham St Annes, the Blackpool Airport Enterprise Zone, the Warton element of the Lancashire Enterprise Zone and new housing development is a clear example of a strategic infrastructure improvement which does not only indicate a reason for moving away from the standard method but also reinforces the need to concentrate new housing development in the vicinity of Lytham St Annes as an accessible Key Service Centre and the largest settlement in the Borough.

2.6 Finally, we have already made reference to the unmet need for Wyre Borough in our submission for Matter 1 but it is clear that this provides further justification for divergence from the standard method.

2.7 For these reasons it is therefore suggested that there are exceptional circumstances that exist that indicate that Fylde should not use the standard method for the calculation of their housing need.

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

2.8 The inclusion of a minimum housing figure as a range is confusing and fails to provide the certainty required in a plan led system. The Council justifies this by providing the lower figure as the result of the standard method calculation, yet referring to the higher figure as being derived from calculations undertaken during the preparation of the local plan which the Council still clearly consider are relevant

or otherwise they would not have made any reference to them. Given there are exceptional circumstances in existence that indicate the standard method is not appropriate for Fylde, the local plan should simply continue with the higher figure.

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?

2.9 It is noted that whereas the word minimum is retained in Policy DLF1 it is proposed to be deleted from Policy H1. Again, this is inconsistent and confusing. Any housing land requirement should be expressed as a minimum to ensure there is no shortfall and to enable other sites to come forward if the supply falls below the required five-year figure. It would also be consistent with the Government's commitment to ensure more new homes are delivered.

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?

2.10 Para. 16 d) of the NPPF requires that development plan policies are clear and unambiguous. This is clearly not the case for Policy H1 in particular and to a lesser extent, Policy DLF1.

2.11 Policy H1 and its explanatory text does not clearly justify why it has a range as a minimum housing requirement and it is clear that the most appropriate way forward would be to apply the higher figure as a minimum to provide clarity and certainty. No harm would result from applying the higher figure, particularly given the Council's economic aspirations and forthcoming infrastructure improvements and it would address the issues and concerns in respect to future affordable housing provision, housing for the elderly and other housing needs such as self build housing.

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

2.12 The delivery of affordable homes in Fylde has been below the required rate for a number of years. A reduction in the housing requirement to a minimum rate of 275 dwellings per annum for the remainder of the plan period would have a further catastrophic effect on affordable housing delivery as it would equate to only about 81 affordable dwellings per year given the standard rate set out in the local plan of 30%. However, given the large number of small sites within the Borough and the failure to secure 30% on many sites due to viability issues, this figure would in fact be significantly lower. The impact of

this would be an escalation of housing need within the borough with no way of addressing this until the end of the plan period.

2.13 The impact of this will be particularly acute in Lytham St Annes which is not only the largest settlement in the Borough but also the least affordable as acknowledged in para. 2.25 of the adopted Local Plan. Furthermore, the largest commenced site in the Borough, Queensway, is now for sale and there is significant doubt over its future delivery. Given the affordability issues in Lytham St Annes this will only serve to exacerbate the critical issue in terms of a lack of affordable housing delivery in this part of the Borough in a Tier 1 Key Service Centre.

2.14 In order to secure affordable housing within the Borough and in particular in Lytham St Annes it is therefore essential that the higher figure of 415 new homes per annum at the very least is maintained as a starting point, subject to an updated calculation of housing land supply.

b. achieve its economic ambitions to deliver growth, specifically employment provision and jobs, in line with the overall strategy for the Borough?

2.15 As outlined in our response to Q1(a) above, Fylde, working alongside Blackpool and other groups have ambitious plans for economic growth as demonstrated by their key involvement in the Blackpool Airport Enterprise Zone which aims to create 5,000 new jobs. Furthermore, support for new infrastructure and the Lancashire Enterprise Partnership is an inherent part of the Council's economic strategy.

2.16 This anticipated rate of growth, which would appear to be greater than that allowed for in previous years, is not matched by any ambition in respect to new housing provision. Rather it coincides with a potential significant fall in the minimum requirement.

2.17 The result of this is a potential shortage of good quality new homes which would be counter productive to the growth ambitions of the Council.

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?

2.18 It is noted that no changes are envisaged to Policy H2.

2.19 The NPPF defines Older People as:

People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

- 2.20 This is different from Policy H2 which only refers to the elderly and therefore it is suggested that the NPPF would override Policy 2 in consideration of matters pertaining to older people. This could have significant development management implications in the determination of planning applications and the provision of sufficient housing to meet the needs of this cohort – significantly increasing demand and having a consequential impact upon the housing requirement.

3.0 APPENDIX

APPENDIX CA1a – Location of Promoted Site

APPENDIX CA1B – Location of Promoted Site and Adjoining Land

APPENDIX CA2 – Updates on Housing Land Supply

APPENDIX CA3 – Extract from Blackpool Local Plan Housing Topic Paper

APPENDIX CA4 – Economic Prosperity Board Agenda 17 December 2017

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