

Fylde Council,
Planning Policy Team,

SENT BY EMAIL
planningpolicy@fylde.gov.uk
03/09/2020

Dear Sir / Madam,

FYLDE LOCAL PLAN: PARTIAL REVIEW

1. Thank you for consulting with the Home Builders Federation on the Partial Review of the Fylde Local Plan to 2032.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Council are proposing to amend the Local Plan to set out the consideration they have given to the unmet housing need in Wyre. They highlight that the adopted Wyre Local Plan will result in a shortfall of 380 dwellings, which therefore triggers the early review mechanism contained in paragraph 1.27 of the Fylde Local Plan. However, they also identify that the Wyre Local Plan will be subject to a partial review, which includes the objective of meeting the full OAN for Wyre. This has led to the Council proposing to amend paragraph 1.27 to state that a '*Partial Review of the Fylde Local Plan therefore has not needed to incorporate alterations to its strategic policies or housing needs or requirement figure, other than those changes made for other reasons, following consideration of the issue of housing needs in Wyre*'. The HBF is concerned by this particularly as there no evidence available at present to demonstrate that Wyre can meet the housing need within their own area.

Policy DLF1

Proposed policy DLF1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons:

4. The Council proposes to amend this policy to state that the '*Local Plan will provide sites for a minimum of 6,895-8,715 new homes . . . over the plan period to 31 March 2032*'.
5. The HBF is concerned that the policy does not provide a clearly written and unambiguous policy and is therefore not consistent with national policy¹. Providing the housing requirement as a range does not provide clarity and it may not always be clear how this should be

¹ Paragraph 16 of NPPF 2019

considered as part of the decision-making process. The HBF is also concerned that it is not clear whether the figure is a net figure or not.

6. The HBF is concerned by the use of a housing range, which although the text still 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. 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.
7. The Housing Needs and Requirement Background Paper (March 2020) sets out the calculation of the Local Housing Need (LHN) for Fylde using the standard methodology, it identifies a LHN of 275 dwellings per annum (dpa). It also highlights that the evidence for the adopted plan identified an Objectively Assessed Need (OAN) of between 410 and 430dpa, and that the Inspector concluded that the housing requirement figure of 415dpa was sound. The Paper goes on to explain that the LHN will only be applied from 2019/20, and that the adopted figure of 415dpa will be applied to the period 2011/12 to 2018/19, giving a requirement of 6,895 of the plan period.
8. 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. PPG² 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.
9. 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.
10. 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. The Draft Statement of Common Ground (March 2020) highlights that it will be for Wyre to determine whether it reviews its housing requirement figure through the Partial Review. It also identifies disagreement in relation to Fylde’s statement that *‘the revised housing requirement in the Partial Review of the Fylde Local Plan to 2032 allows account to be taken of any need from neighbouring authorities that cannot be met, up to the amount of unmet need from the adopted Wyre Local Plan (2011-2031), should any need that cannot be met exist following Wyre’s Partial Review’*.

² PPG ID: 2a-010-20190220

11. 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.

	2014/15	2015/16	2016/17	2017/18	2018/19	Total	Average
Fylde	207	304	455	470	490	1,926	385

12. As has been previously set out, 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.
13. 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 2,499³ whilst the 2018-based projections show an increase of 4,280⁴.
14. Planning for the Future (March 2020) states that the Government will review the formula for calculating Local Housing Need and is looking to introduce a new approach which encourages greater building and makes sure the country is planning for the delivery of 300,000 new homes a year. The ‘Changes to the current planning system’ (August 2020) document sets out these proposed changes to the standard method for assessing local housing need. These changes include consideration of the existing housing stock and an affordability adjustment that takes into account changes over time. This new method identifies an indicative housing figure of 488dpa⁵ for Fylde, again the consultation identifies that the standard method provides the starting point and not the final housing requirement. This suggests that the housing need for Fylde could be much higher than currently proposed. In addition, the LHN for Wyre calculated using this method will also increase to 383dpa, which could increase the necessity for Fylde to meet their unmet need.
15. The Plan period runs from 2011 until 2032, the HBF are concerned that this does not provide a 15-year period from adoption and will at best only look forward 11 years. This would be contrary to the NPPF⁶ which states that ‘*strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities*’. Therefore, the HBF consider that the Council should look to extend the Plan period, and consider review of any other policies that may be impacted by this need to ensure a 15-year period from adoption.

³ 2014-based household projections 2020 – 37,454, 2030 – 39,953

⁴ 2018-based household projections 2020 – 38736, 2030 - 43016

⁵ Existing Stock 2019 = 39,820, 0.5% of existing stock = 199.1, 2018-based household projections: 2020 = 38,736, 2030 = 43,016, average 428dpa, ratio of median house price: 2009 = 5.23, 2019 = 5.43, adjustment factor $((5.43-4)/4) \times 0.25 + ((5.43-5.23) \times 0.25) + 1 = 1.139375$, LHN: $428 \times 1.139375 = 487.6525\text{dpa}$

⁶ Paragraph 22 of the NPPF

Policy GD4

Proposed policy GD4 is not considered to be sound as it is not positively prepared or consistent with national policy for the following reasons:

16. The Council are proposing to make amendments to the policy for development in the Countryside. The HBF does not consider that this policy is in line with NPPF 2019⁷, which looks for planning policies to be responsive to local circumstances, to support housing developments that reflect local needs and to locate housing where it will enhance or maintain the vitality of rural communities. It then goes on to set more restrictive policies for 'isolated homes in the countryside', these are similar to those currently included in Policy GD4. The HBF consider that this policy should be amended to better reflect the policy set out in NPPF.

Policy H1

Proposed policy H1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons:

17. The Council proposed to amend this policy to state '*the Council will provide for and manage the delivery of new housing by setting and applying 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*'.

18. As has been set out in the response above to Policy DLF1, the HBF do not consider that this amendment is sound. In summary the HBF consider that:

- the policy is not clearly written and it is not clear how the range would be used in the decision making process;
- that the range, and the removal of the word minimum from this version of the policy, would be contrary to the Government's objective to significantly boost the supply of homes;
- that the housing need is higher than that provided by the LHN calculated using the standard method, and therefore the policy is not positively prepared or justified;
- that there remain issues with the unmet need from Wyre, and therefore the policy is not effective; and
- that the plan period is no longer consistent with the NPPF requirements.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. Please keep the HBF informed of the next stage of consultation upon this document and any other planning documents. I am happy to discuss further any of the comments made within this representation with the Council prior to the next stage of consultation. Please use the contact details provided below for future correspondence.

Yours sincerely,



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⁷ Paragraphs 77-79 of the NPPF