

SENT BY EMAIL
Planningpolicy@fylde.gov.uk
08/09/2021

Dear Planning Policy Team,

PARTIAL REVIEW FYLDE LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Partial Review of the Fylde Local Plan 2032 – Schedule of Proposed Main Modifications consultation.
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 HBF would like to submit the following comments on the proposed Main Modifications.

MM1: Paragraph 1.26 - 1.27 & MM5: Paragraphs 9.13-9.14, 9.16-9.17 and 9.19

4. The HBF considers that it is appropriate for the plan to ensure that it contributes to the issue of addressing unmet need in Wyre. Therefore, the amendment of this text to address this issue is appropriate. However, the HBF remains concerned that the housing requirement is not sufficient and should be increased; and does not consider this element of the amendment to be sound.

MM2: Policy DLF1 – Development Locations for Fylde, MM5: Paragraphs 9.13-9.14, 9.16-9.17 and 9.19, MM6: Policy H1 – Housing Delivery and Allocation of Housing Land

5. The HBF considers that the amendment to remove the range of the housing requirement is appropriate and adds clarity to the policy. However, the HBF does not consider that the housing requirement is sound and considers that the housing requirement should be increased.
6. 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. PPG¹ states that these circumstances can include growth strategies for the area; strategic

¹ PPG ID: 2a-010-20190220



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.

7. Whilst the housing requirement has been increased above the minimum LHN identified by the standard method in order to meet the unmet demand from Wyre it has not been increased any further to account for other elements of increased need and demand, identified by the high levels of delivery since 2016, the SHMA and the more recent household projections.

Future Engagement

8. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
9. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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