

Date: 25.04.18

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Dear Mr Blackburn,

WYRE LOCAL PLAN EXAMINATION: BLACKPOOL COUNCIL RESPONSE TO INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

1. Thank you for consulting Blackpool Council on the Inspector's Matters, Issues and Questions (MIQs) which will form the basis for discussion at the forthcoming hearings. We welcome the opportunity to comment.
2. Please find our comments on the MIQs below. We have only provided responses in relation to the MIQs that have relevance to our original representations and where we think there is a need to provide an additional response.
3. Wyre have provided a summary and response to our representations in the Statement of Consultation Appendix 14 (SD007g). However, this document omits, or does not accurately summarise, some of our key concerns as set out in our original representations. Wyre have not responded to some of our concerns, or in some cases have only provided a very brief response. Please also refer to our original representations to the Publication Draft Wyre Local Plan (ED120 022-0495 pages 7 – 38), which are referred to throughout this response.
4. We would like to confirm that we do not wish to participate at the hearing sessions.

Matter 1: Legal Compliance, Procedural Requirements and the Duty to Cooperate

Issue 2: Compliance with the DtC, particularly in relation to consideration of housing needs

Question 2.1: Is there evidence that the Council has cooperated effectively with adjoining authorities in seeking to meet any unmet housing needs from the District?

5. Blackpool Council's comments on compliance with the DtC can be found in paragraphs 2.1 – 2.11 of our representations (0032/P/01/B2) to the Publication Draft Wyre Local Plan.

6. The housing section of the April 2015 Memorandum of Understanding states that we (the Fylde Coast authorities and Lancashire County Council) will work together to reach a consensus on housing provision across the Fylde Coast sub-region. DtC meetings have been ongoing throughout the Wyre Local Plan preparation process. Paragraph 2.5 of our representations sets out a timeline of key correspondence between Blackpool and Wyre relating to the provision of housing in Wyre.
7. Unfortunately it has not been possible to reach a consensus on housing provision and as stated in paragraph 2.10 of our representations we have significant concerns about the approach proposed to calculating housing need, as set out in the in the Publication Draft Wyre Local Plan and supporting documents.
8. However, notwithstanding these concerns, we would like to draw the Inspector's attention to paragraph 2.10 of our representation, where we set out that there is a commitment in the Blackpool Core Strategy (paragraph 5.23) to work with Wyre and Fylde to ensure that the overall housing needs of the housing market area are met in full.
9. Since submitting our representations a further DtC meeting has taken place on 14 November 2017. At this meeting it was agreed that an appropriate way forward was for the issue of Wyre's OAN and any shortfall to be addressed via the Local Plan examination process.
10. Wyre have provided a summary and response to our representations in relation to the DtC on page 71 of the Statement of Consultation Appendix 14 (SD007g): We would like to provide the Inspector with some additional comments with regard to Wyre's responses.
11. We welcome acknowledgment that the September 2017 Statement of Compliance with the DtC contained errors and that paragraph 5.20 was incorrect because concerns had been raised by Blackpool and Fylde with regard to the identified OAN figure. We acknowledge that paragraph 5.20 has been removed from the January 2018 DtC Statement of Compliance (SD008) and that this revised document does now refer to the fact that concerns have been raised.
12. However, Wyre's response in relation to the DtC meeting on 14 November 2017 does not completely accord with our understanding of what was agreed and it is not reflected in the minutes of the meeting as set out in Appendix 7 of the revised January 2018 DtC Statement of Compliance (SD008). Wyre state that:

"....it was agreed that an appropriate way forward was to allow the Wyre Local Plan examination to determine/confirm the shortfall and then adjoining local authorities will consider if and how they can assist"
13. However, our understanding of what was agreed, as reported in the meeting minutes, was that the issue of Wyre's OAN and any shortfall will now be addressed through the Examination process and that Blackpool and Fylde will put their views forward as such.

In relation to these matters it was further agreed that there is a key issue of strategic planning, local plan review and strategic (sub-regional) highways matters that needs to be a key focus of Fylde Coast DtC discussions post a decision on Wyre's OAN and that whether or not there is an issue of addressing any housing shortfall, moving forward on strategic issues across the Fylde Coast is an important matter for DtC discussions.

14. We would like to emphasise that the latest addenda to the SHMA (ED088 - Turley Addendum 3) and Employment Land Study (ED107 - Lichfields Addendum 2) were not available prior to the workshop on 5 July 2017. These documents took account of the latest data to inform each stage of the OAN methodology and Wyre have made assumptions on the basis of this new data. This included updated evidence on likely job growth (which was significantly lower than previous projections) in Lichfields Addendum 2 and updated data from the 2014-based sub-national population projections and 2014-based sub-national household projections in Turley Addendum 3.
15. We consider that the fact that these addenda were not available prior to the workshop limited its scope and usefulness, because we were only able to make comments on the basis of earlier evidence and any information that was presented to us at the workshop. Lichfields Addendum 2 was published after the workshop in July and Turley Addendum 3 was published in September. Therefore, at the workshop we were unable to comment on these documents, or properly consider the updated data and the assumptions made in relation to this data when deriving the OAN.
16. Wyre have responded to the Inspector's Preliminary Views on Matters and Issues in EL1.001b. In relation to the DtC, the Wyre response states that

"Apart from Lancaster who have published their local plan with a shortfall against their OAN, there has not been any evidence from Blackpool or Preston that they cannot assist. This will be a matter for them to consider when they next review their respective plans".
17. We would like to provide some clarification on this matter from a Blackpool perspective. Following earlier correspondence, on 22 August 2016 we responded formally to Wyre on this issue (Appendix 5 of our representation to the Wyre Local Plan – pages 32-36 of ED120 022-0495). We highlighted in this letter that the adopted Core Strategy sets out a sustainable approach to development in the Borough, and that it considers all three dimensions of sustainable development. We indicated that even if the assumptions that Wyre had made regarding the OAN were sound, we did not have the capacity to provide for Wyre's unmet housing need, without compromising our approach to sustainable development, as set out in the Core Strategy.
18. We highlighted that Blackpool is urban and compact and largely built up to its boundaries, which means that there is limited open space and also a limited supply of future development land. The Core Strategy indicates that much of the open land that does exist to the east of the town has important, landscape, nature conservation and amenity value. These constraints meant that not all of Blackpool's Core Strategy

employment land requirement could be accommodated in the Borough. Therefore, through the DtC Fylde Council agreed to provide 14 hectares of employment land in Fylde to help meet these needs.

19. We also highlighted the fact that Blackpool has an unbalanced housing market, with a concentration of poor quality housing and limited choice of family housing in the inner areas and very high levels of deprivation. As a result the Core Strategy has a dual strategy focus on:

- regeneration within the town centre, resort core and neighbourhoods within the inner area; and
- supporting growth in South Blackpool to help meet housing and employment needs, whilst recognising the important character of remaining lands at Marton Moss

20. We emphasised that there was a focus on housing growth, but that there was also a focus on regeneration of the inner area and that supporting housing growth should not come at the expense of regeneration and the social and environmental dimensions of sustainable development. We directed Wyre to the detailed evidence to support this position in terms of our evidence base at www.blackpool.gov.uk/evidencebase. Therefore, we find it misleading to state that there has not been any evidence from Blackpool that they cannot assist.

Question 2.2: Is the Memorandum of Understanding (MoU) an effective tool to facilitate ongoing engagement with adjoining authorities?

21. We consider the MoU to be an effective tool to facilitate ongoing engagement with adjoining authorities. It formalises the ongoing dialogue and co-operation that currently exists between the four authorities. The DtC is an ongoing process; as issues and the policy approach are agreed other issues will arise which will need to be addressed. There is provision within the MoU for it to be updated and reviewed as appropriate, in accordance with the governance arrangements, in order to reflect changing circumstances. Therefore, the MoU is a flexible tool. The draft National Planning Policy Framework proposes changes to the provisions for cooperation between local authorities on strategic matters and it proposes the introduction of statements of common ground. Consideration will need to be given to these changes when the MoU is reviewed.

Matter 3: Housing and Employment Objectively Assessed Needs (OAN) and Requirements

Issue 1: The Housing OAN

Question 1.1: Does the evidence base support the OAN for housing of 479 dwellings per annum (dpa) or 9580 dwellings for the LP period?

22. Blackpool Council's comments on the appropriateness of the OAN for housing can be found in paragraphs 3.1 – 3.32 of our representations to the Publication Draft Wyre Local Plan (0032/P/02/GC). We do not consider that the evidence base supports the OAN for housing of 479 dwellings per annum or 9580 dwellings for the LP period and this is set out in our representations.
23. Wyre have provided a summary and response to our representations in relation to the calculation of the OAN on page 93 of the Statement of Consultation Appendix 14 (SD007g): We would like to provide the Inspector with some additional comments with regard to Wyre's responses.
24. It should be noted that Wyre's summary omits significant elements of our representations to the Publication Draft Wyre Local Plan and fails to respond to them. It omits our comments on the demographic projection of need relating to the sensitivity of dwelling requirement figures in relation to changes in assumptions and the need for caution and judgement to be applied when interpreting them. It also ignores our comments about the slow recovery of Wyre's economy and the potential implications for housing completions and population growth. The summary omits our query about how the aims and objectives of the Wyre Local Growth Plan have been taken into account, in particular in relation to the aim that residents are able to reside in Wyre and work in Wyre. The summary also ignores our comments on determining the final OAN.
25. In paragraphs 3.22 – 3.24 of our representations we disagreed with the assertion in Turley Addendum 3 that provision at the higher end of the OAN range identified will represent a positive response to the evidenced need for affordable housing in Wyre, because of the context of its likely delivery. In their response Wyre state that there is a significant need for affordable housing and that whilst a separate quantified uplift is not prescribed, this is considered to support a level of flexibility in the OAN and reinforce the importance of an uplift.
26. We agree that there is a need for more affordable housing in Wyre, as evidenced by the Wyre Rural Housing Needs Survey and the Strategic Housing Market Assessment and its addenda. However, this need will not be met by uplifting the OAN because Wyre have not identified enough land to meet the OAN and additional housing will not be delivered in Wyre. The affordable housing need arises in specific locations in Wyre, such as those covered by the Wyre Rural Housing Needs Survey. Any additional housing development

that takes place outside of Wyre will not address the affordable need of households that require affordable housing in the towns and villages of Wyre.

27. In terms of market signals we highlighted that there was limited evidence of an imbalance in housing supply in Wyre and that there was no justification to include a 5% uplift for market signals. In response Wyre state that:

“Albeit limited, market signals show a small imbalance between housing supply and demand hence why the uplift is just 5%. The methodology requires that an uplift is made and this has been concluded by an increasing number of Local Plan Inspectors”.

28. The methodology in Planning Practice Guidance only requires an uplift if this is justified by analysis of appropriate market signals. It also refers to “*areas when an uplift is required*”, which implies that uplifts will not always be required. Paragraph 5.52 of Turley Addendum 3 confirms that Inspectors have concluded elsewhere that adjustments for market signals are not required where the scale of uplift already applied in deriving the OAN would boost supply and provide an appropriate response to market signals. We consider that no uplift is justified in Wyre because there is a very limited imbalance between housing supply and demand and a significant uplift has already been applied in deriving the OAN, which boosts supply.

29. Wyre do not summarise or respond to our comments on determining the final OAN in the Statement of Consultation. However, we would like to reiterate the point that Wyre rely on the upper end of calculations and significant uplifts throughout the calculation process, but still add a further stage to maintain a younger working age population, even though the extra housing would not be delivered in Wyre. There is no justification for this approach.

30. There is also no justification for the final OAN figure of 479 dpa, which has not changed since February 2016, despite the publication of a range of updated evidence. We do not consider that the evidence base supports the OAN for housing of 479 dpa.

Question 1.2: Or should the OAN be higher to support job growth and the delivery of affordable housing?

31. No. We do not consider that the OAN should be higher to support job growth and the delivery of affordable housing. Please refer to our comments in response to Issue 1 Question 1.1 and in paragraphs 3.11 – 3.19 (taking employment land trends into account) of our representations to the Publication Draft Wyre Local Plan (0032/P/02/GC). With respect to job growth the figures are not transparent and appear to have been rebased rather than covering the plan period 2011 – 2031.

32. A higher OAN would not result in additional housing delivery in Wyre, because Wyre have not identified sufficient land to deliver housing to meet the OAN of 479 dpa. Please refer to our comments in response to 3.22 – 3.24 (affordable housing need) of our representations to the Publication Draft Wyre Local Plan (0032/P/02/GC).

Question 1.3: Alternatively should the OAN be lower taking into account the new methodology for calculating housing need proposed within the draft revisions to the NPPF?

33. Whilst the OAN does have to be based on the new methodology, due to the current stage of the Plan, the revised NPPF will be published in July 2018 and any new update of evidence will be required to utilise the standard methodology and this will need to be applied across the three Fylde Coast authorities to ensure consistency across the housing market area. The choice of OAN should be mindful of the implications of the new methodology.

Issue 2: The Employment OAN

Question 2.1: Does the evidence base support the OAN of 43 ha of employment land?

34. No. Please refer to our representations (0032/P/05/OGC) to the Publication Draft Wyre Local Plan (Additional observations and questions regarding the evidence base with respect to the Wyre Employment Land Study Addendum 2017). With respect to the employment land range proposed by Lichfields of 32 – 47 ha, in our representations we stated that it was unclear why the top end of the range (47 ha) is included when the conclusions in paragraph 5.8 of the Employment Land Study Addendum 2017 suggests caution in using past trends, as they do not provide evidence over a full development cycle. We stated that it was unclear how this range translated into an OAN of 43 ha of employment land and that further justification/clarification was needed as to how the 43 ha figure had been arrived at.
35. Wyre have provided a summary and brief response to these representations on page 186 of the Statement of Consultation Appendix 14 (SD007g). Unfortunately some of Wyre's response is omitted from the version of this document that is available online. The response that is set out does not provide adequate justification for an OAN of 43 ha of employment land.

Issue 3: Alignment between housing and employment OAN

Question 3.1: Is there sufficient alignment between the housing and employment OANs?

36. No. Please refer to our representations in paragraphs 3.11 – 3.19 of our representations to the Publication Draft Wyre Local Plan (0032/P/02/GC).

Issue 4: The Housing Requirement of 8,225 dwellings

Question 4.1: Does the shortfall in the housing requirement against the OAN reflect a positively prepared LP and one that is justified?

37. No. We do not consider that the Plan is positively prepared and justified. In order to be positively prepared a plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. The Wyre approach is not based on a strategy that seeks to meet objectively assessed development and infrastructure requirements within Wyre.
38. Instead the approach appears to rely on neighbouring authorities to meet any unmet need, with little regard to infrastructure requirements and constraints outside of Wyre. As we set out in paragraphs 3.11 – 3.19 of our representations (0032/P/02/GC) no discussions have taken place through the DtC in terms of changes to commuting rates and the impact on highways, which could be significant if housing need is met outside of Wyre. As we also stated, the approach taken fails to take account of the Vision and Objectives of the Wyre Local Growth Plan (2014-2017) which has an aim that residents *'be able to reside in Wyre, work in Wyre and ultimately spend in Wyre'*.
39. In order to be justified a plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Wyre have only allocated large housing sites of 25 dwellings or more. This conflicts with the draft NPPF requirement for local planning authorities to ensure that at least 20% of sites identified (allocated) in their plans are of half a hectare or less. It also doesn't encourage custom/self-build housing which may often take place on smaller sites. Wyre do not incorporate a small sites windfall allowance and seem to effectively dismiss the prospect of any additional dwellings coming forward on small sites. Wyre could pursue an alternative strategy involving the incorporation of a small sites windfall allowance, or the allocation of smaller sites. In addition the use of standard build out rates on some allocations (those that Wyre do not predict to be completed during the plan period) would provide for a lower shortfall in the housing requirement against the OAN. Please see our responses to Matter 4 and to Matter 8.

Question 4.2: Are the highway constraints overstated?

40. Paragraphs 5.1 – 5.3 of our representations to the Publication Draft Wyre Local Plan (0032/P/04/OGC) set out our comments on transport issues.
41. With concerns about the traffic impact of Wyre's proposed development, Blackpool Council welcomes Lancashire County Council's recognition of the Plymouth Road (A587) LinSig traffic model, which confirms this key part of the Blackpool highway network to be 'around capacity' currently. Productive dialogue with Wyre Council and Lancashire County Council has commenced regarding future traffic modelling scenarios. It is intended that proposed development traffic flows from the Poulton-le-Fylde Congestion study (Final version only published February 2018) are input to the traffic model to determine the impact at peak times, so as to help inform subsequent discussions about solutions/mitigation.

Question 4.3: In particular would development to meet the OAN result in severe residual cumulative impacts on the highway network having regard to improvements that can be undertaken?

42. Please see response to Question 4.2 above.

Question 4.5 Is there justification for releasing more employment sites for housing in view of the shortfall of housing compared to employment land?

43. Yes. Wyre assume employment land losses of some 0.9 ha per annum. It is likely that at least some of these losses would be to housing development.

Matter 4: Housing Land Supply

Issue 1: Components of Housing Supply

Question 1.4: Should there be a windfall allowance?

44. We consider that there is compelling evidence for Wyre to include a windfall allowance for small sites in the Local Plan. Past completion figures and current planning permission figures show the importance of such sites to housing delivery in Wyre. Please refer to our comments on the need to include a windfall allowance in paragraphs 4.4 – 4.9 of our representations to the Publication Draft Wyre Local Plan (0032/P/03/GC).

Issue 3: Five Year Housing Land Supply

Question 3.2: Generally, are the assumptions about the delivery from commitments and allocations realistic?

45. Paragraphs 4.10 – 4.15 of our representations to the Publication Draft Wyre Local Plan (0032/P/03/GC) set out our concerns about the assumptions made with regard to build out rates on some of the allocations. These are set out in more detail in our responses to Issue 3.3 and to Matter 8.

Question 3.3: Are lead in times and build out rates within the Housing Background Paper realistic?

46. We expressed concern about the build out rates set out within the September 2017 Housing Background Paper, which were unclear and we cited a lack of clarity in their application to individual allocations (0032/P/03/GC). Wyre Council's response to Blackpool's representation on build out rates is set out in Appendix 14 of the Statement of Consultation (SD007g). The response states that the Council's approach to build out

rates is explained in the Housing Background Paper (HBP). Wyre Council have produced a January 2018 Update to the HBP, which provides additional information. This information is summarised in Appendix 15 of the Statement of Consultation and has been taken account of in our responses in relation to individual allocations.

47. Table 14 of the January 2018 HBP sets out standard assumptions on build out rates for sites of various scales with planning permission, but does not indicate whether these apply to single developers, or to multiple developers on larger sites. Paragraph 7.27 then sets out further build out rate assumptions for deliverable allocations, but these assumptions do not appear to fit well with the assumptions in Table 14 and there is no indication of how they were derived. For example, whilst Table 14 indicates that 60 units could be delivered per annum on a site of 251+ units and 45 units could be delivered per annum on a site of 101 – 250 units, paragraph 7.27 suggests that no site (of any size) will deliver more than 40 dwellings per annum from a single developer and that even where two developers are on site the maximum delivery will only be 50 dwellings per annum.
48. There is limited explanation as to why particular build out rates have been assumed for each site, or how many developers are anticipated. In many cases the build out rates do not accord with the standard build out rates in table 14.
49. Our comments on build out rates in paragraphs 4.10 – 4.15 of our representation highlight four allocations (SA1/2 Lambs Road/Raikes Road, SA1/11 North of Norcross Lane, SA3/3 West of Great Eccleston and SA3/4 Forton Extension) where (according to the trajectory in Appendix 2 of the HBP) the housing delivery rate will not be sufficient to ensure site completion over the plan period. This has a significant negative impact on Wyre's ability to meet the objectively assessed housing need that it has identified.
50. Paragraph 7.25 of the January 2018 HBP confirms that there is nothing to prevent sites coming forward in a different manner to that set out in the trajectory and the Local Plan does not propose a restrictive phasing policy to the release of any allocated housing sites. We consider that all four of the allocations could be completed during the plan period if Wyre's standard build out rates were applied. This would result in the delivery of an additional 348 dwellings over the plan period, which could significantly reduce the level of unmet need identified. Further information is set out in our responses to Matter 8.

Matter 8 – Allocations: Fleetwood, Thornton and Norcross

Issue 9: Delivery

Question 9.1: Are the assumptions about the rate of delivery of houses from the allocations realistic?

SA1/2 Lambs Road/Raikes Road

51. The rate of delivery on this site differs from the standard assumptions in the HBP. This allocation has a total capacity of 437 dwellings, but only 360 dwellings are expected to be delivered by 2031, which is a 77 dwelling shortfall.
52. The housing trajectory in the HBP assumes delivery of only 30 dwellings per year from 2024/2025 onwards on this allocation. This is a build out rate that is well below that set out in Table 14 of the HBP, which specifies 60 units per annum for a site of this size. Paragraph 7.27 of the HBP doesn't provide any justification for the build out rate proposed.
53. The allocation is in two separate parcels and is of a size where multiple developers could be anticipated, or a single developer could realistically exceed 30 dwellings per annum (Paragraph 7.27 provides for up to 40 dwellings for a single developer). Therefore, we consider that the build-out rate should be amended upwards to reflect the scale of the allocation and the standard assumptions.

SA1/11 North of Norcross Lane

54. The rate of delivery on this site differs from the standard assumptions in the HBP. This allocation has a total capacity of 338 dwellings, but only 295 dwellings are expected to be delivered by 2031, which is a 43 dwelling shortfall.
55. The housing trajectory in the HBP assumes delivery of only 25 dwellings per year from 2020/2021 onwards (and 20 dwellings in 2019/2020). This is a build out rate that is well below that set out in Table 14 of the HBP, which specifies 60 units per annum for a site of this size. Paragraph 7.27 of the HBP doesn't provide any justification for the build out rate proposed.
56. The allocation is of a size where multiple developers could be anticipated, or a single developer could realistically exceed 25 dwellings per annum (Paragraph 7.27 provides for up to 40 dwellings for a single developer). Therefore, we consider that the build out rate should be amended upwards to reflect the scale of the allocation and the standard assumptions.

Matter 8 – Allocations: Great Eccleston and Over Wyre including Stalmine, Hambleton and Pilling

Issue 9: Delivery

Question: 9.1 Are the assumptions about the rate of delivery of houses from the allocations realistic?

SA3/3 West of Great Eccleston

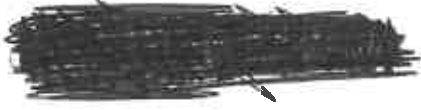
57. The rate of delivery on this site differs from the standard assumptions in the HBP. This allocation has a total capacity of 590 dwellings, but only 450 dwellings are expected to be delivered by 2031, which is a 140 dwelling shortfall.
58. The housing trajectory in the HBP assumes delivery of only 40 dwellings per year from 2022/2023 onwards. This is a build out rate that is well below that set out in Table 14 (60 units per annum for a site of this size) and below the smaller settlement maximum (60 dwellings per annum) that is specified in paragraph 7.27.
59. The allocation is in two large separate parcels and is of a nature and size where multiple developers could be anticipated. Therefore, we consider that the build-out rate should be amended upwards to reflect the scale of the allocation and the standard assumptions.

Matter 8 – Allocations: Forton and Hollins Lane

SA3/4 Forton Extension

60. The rate of delivery on this site differs from the standard assumptions in the HBP. This allocation has a total capacity of 468 dwellings, but only 380 dwellings are expected to be delivered by 2031, which is an 88 dwelling shortfall.
61. The housing trajectory in the HBP assumes delivery of only 40 dwellings per year from 2022/2023 onwards. This is a build out rate that is well below that set out in Table 14 (60 units per annum for a site of this size) and below the smaller settlement maximum (60 dwellings per annum) that is specified in paragraph 7.27.
62. The allocation relates to a number of unconnected land parcels and is of a scale and nature where multiple developers would be expected. Therefore, we consider that the build-out rate should be amended upwards to reflect the scale of the allocation and the standard assumptions.

Yours sincerely

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Ms Jane Saleh - Head of Planning Strategy

