

# RESPONSE to the Consultation

## on Additional Evidence in Support of the Fylde Local Plan To 2032. Submitted by Fred Moor. (Local Resident)

It must therefore be the case that aspects of the plan, such as the scale of employment land required, are nothing more than a chosen forecast - a selected prophecy - (*from wholly conflicting evidence*) regarding what might happen in the future.

And none of the evidence, new or old, takes adequate account of the growing international warnings of the effect that automation and robotics will have on 'employment' as we currently understand it.

By choosing to use a 'historic take-up' model as the basis of its calculation in preference to the other six models using equally valid evidence on employment and labour supply as a basis, Fylde selected a methodology that said it needed to approximately double its employment land requirement - rather than recognise the evidence of the other six models - two of which show a need for no increase, and four of which show a need for about one quarter of the land that has already been identified to become available under existing plans.

The new evidence<sup>10</sup> simply shows that Fylde's selected preference to use the historic take-up model has been perpetuated, but the deckchairs haven't been moved around a little.

I trust Mr Guest will deal with the employment land issue in more detail, so at this time I have confined my comments to the broad-brush overall reason why I believe the plan is unsound in relation to employment land required.

## **4. UNSOUND AFFORDABLE HOUSING EVIDENCE**

### **4.1 INTRODUCTION**

The shift to choosing a 'growth agenda' for employment land illustrates the selective adoption of a preferred course from conflicting evidence. But crucially, it also impacts on the number of houses that are said to be needed.

The underpinning logic is that the vision of very significant growth in employment in Fylde will bring the requirement for a lot more houses.

Fylde's asserted annual dwelling need increased from the 155 dwellings a year that was set out in the *2001 to 2016 Joint LCC Structure Plan*, to 306 in the draft regional Spatial Strategy. It is now said to be 415<sup>11</sup>

At a superior level, the new evidence shows the latest increase is attributable to two main factors.

- **Demand for residential in-migration to Fylde from elsewhere in the UK, and;**
- **to meet the prophecy of economic growth that Fylde's Mk3 'Vision Statement' hopes to see.**

I recognise the futility of attempting to calculate a need that ultimately depends on the build-out rates chosen by developers. Developers or their agents can effectively bank something like a 100-fold increase in agricultural land value when planning permission is granted for residential use, whilst choosing to build it over periods much greater than five years. This prevents councils from being able to demonstrate holding a five year supply of deliverable planning permissions, which in turn allows developers to secure further landbanking permissions at appeal - simply because they may have chosen to adopt slow build-out rates on sites for which they have already been granted planning permission by FBC.

<sup>10</sup> Consultation Invitation [EL7.002 Annex 1 Fylde Addendum 3 paras 4.41 to 4.49]

<sup>11</sup> Consultation Invitation [EL7.002 Page 10 paras 2.21 onward]

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It seems to me that under such a regime, attempting to use any form of serious calculation to justify a need for any level of housing numbers ought to be viewed in a light similar to alchemy.

It is a rigged game. The figures are entirely meaningless and under the control of developers, not the Council.

But nowhere is the validity and meaninglessness of housing figures more evident than in the issue of Affordable Housing where the new evidence proves that:

- **the stated evidential need for affordable housing is not met by this plan**
- **the evidence has been disregarded in favour of an arbitrary number that has no evidential basis. It is however falsely described variously as ‘a significant positive contribution’<sup>12</sup> and a ‘significant uplift’<sup>13</sup>**
- **the affordable housing numbers proposed in the plan do not meet the stated requirements of the NPPF**

## **4.2 BACKGROUND**

The evidence I presented to the first hearing<sup>14</sup> set out in detail the wholly fallacious basis of the supposed 'need' that Fylde adopted around the year 2000 (and later updated with a further increase) as its requirement for 'affordable' housing.

I pointed out that the *'Introduction'* section of Fylde's extant Local Plan published the dichotomy between the former Lancashire County Council's *'Joint Lancashire Structure Plan' (2001 to 2016)* - which showed that Fylde had an annual need for just 155 dwellings **of \*all types\*** and the Fordham report that had been commissioned by Fylde to *"significantly boost" [my wording]* its housing numbers.

Fordham said Fylde needed a preposterous and impossible 420 of this 115 total to be 'affordable' dwellings.

Fordham subsequently conceded that the *"Survey of Housing Need and Desire"* Fylde had commissioned him to undertake at the turn of the millennium was not intended to be a measurement of practical need for 'affordable' housing, it was intended for benchmarking purposes - to put Fylde into context with other Councils who had used the same particular methodology for similar surveys. Fylde was being fitted-in to show its ranking in that survey.

He admitted his study was not a survey of practical housing need and said the real practical need was not more than one tenth of the 420 affordable houses year he said was 'needed' in Fylde.

That would mean the real need for 'affordable' houses in Fylde would be not more than 42 dwellings a year.

But his survey had conflated desire with need and, because more or less everyone who was asked if they would like a subsidised rent said yes they would, he was correct in saying the 'need and desire' was 420 affordable houses a year.

Fylde took this figure and (for political survival purposes) dropped the *"and desire"* words to make it become *the 'Fylde Survey of Housing Need'*.

The Council wrongly treated it as a practical housing need.

<sup>12</sup> Consultation Invitation [EL7.002 Para 2.8] and Annex 1 Fylde Addendum 3 page 98 Para 6.43]

<sup>13</sup> Consultation Invitation [EL7.002 Annex 1 Fylde Addendum 3 page 98 Para 6.43]

<sup>14</sup> [EL2.004 (i)]

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The real practical need of 42 or less per year sat well within the 150 houses of all types prescribed for Fylde in the LJP, (and would thus have resolved the dichotomy of 420 a year from 150 houses of all types).

Subsequently, Fylde's Planning Policy Scrutiny Committee met on 12th October 2006, and resolved that a new in-depth housing needs survey be commissioned to inform the preparation of the Interim Housing Policy which would soon be needed.

So in February 2007, with the Regional Spatial Strategy (RSS) emerging, and an intention to produce an "Interim Housing Policy", Fylde commissioned an update of its Fordham 2002 Housing Needs Survey. On 10 April 2008 they considered a new report "*Housing Needs and Demand Study*" in response to the (then) impending requirement to undertake a Strategic Housing Market Assessments<sup>15</sup>

Under the heading "Conclusions on Housing Needs (Housing Needs Assessment Model)" the new report said "*The annual net need for affordable housing is now 568 dwelling compared with 420 in 2002. The assessment figure is very close to the assessment provided by DTZ in the draft Strategic Housing Market Assessment of 610 (which has yet to be reported to Members).*"

This further preposterous increase was mostly attributed to "*rapidly rising house prices and rising market rents in the intervening period.*"

So because they had used the same logic, and Fylde's house prices had risen (and rents had followed), less people were able to afford to buy or rent a house in Fylde. So the 'need' for 'affordable' housing had "increased notably"

The (then) emerging RSS said Fylde would need 306 dwellings a year of all types, and the report to FBC noted that "*It is clear that the full need for affordable housing cannot be met by any percentage figure based on the Draft Regional Spatial Strategy figure of 306 pa. Fordham recommends that a borough-wide percentage target of 40% affordable housing on private sector sites could be adopted and has been by Councils with similar scale problems elsewhere.*"

In June 2008 Fylde<sup>16</sup> introduced a new "Interim Housing Policy". Its aims sought to *reconcile "the numerical requirements contained in (draft) RSS" and "to maximise the provision of affordable dwellings to be developed in the interim period to meet identified needs."*

It tacitly accepted that Fylde could not meet the 'evidential need' for Affordable Housing but sought to make an effort toward it by requiring 30% of all housing development over a de-minimus threshold to be delivered as 'Affordable Housing'.

The report considered the type of affordable accommodation needed and concluded that 97% should be available as affordable rented housing.

It should be noted that this was at a time when the 'evidence' showed that not 30%, but something closer to an impossible 200% of Fylde's RSS housing target was needed just for Affordable Housing

It was all a complete nonsense.

Also in 2007 the three Fylde Coast local authorities of Blackpool, Wyre and Fylde had commissioned a Fylde Coast Strategic Housing Market Assessment to be carried out by DTZ consultants. Their final report was completed in early 2008 and adopted by the Council during the summer of 2008. The report included an assessment of the future need for affordable housing. It

<sup>15</sup> [FBC Planning Policy Scrutiny Committee 10 April 2008 item 6]

<sup>16</sup> [FBC Planning Policy Committee Agenda 5 June 2008]

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concluded that an additional 600 units of affordable rented accommodation would be required each year in Fylde Borough.

These two surveys were carried out independently of each other and were said to have used different sources of data. Both were said to have been carried out following the latest and most appropriate government guidance at the time. Fylde's officers said it was *"of interest to note that although independent of each other, the conclusions on affordable housing need of both surveys are very closely aligned"*.

They said<sup>17</sup> *"The Council considers that the surveys referred to above **provide a robust evidence base** to demonstrate the need for the provision of additional affordable housing in the borough."* [My emphasis]

Fylde's acceptance of this 'robust evidence' was used to justify the introduction of the '30% Affordable' requirement on development sites.

On 27th May 2010, the Secretary of State (SoS) for Communities and Local Government issued a letter confirming the Government's intention to abolish RSS.

Fylde decided to continue to operate its Interim Housing Policy and also decided that future policy formulation should be undertaken jointly with Blackpool, Wyre and Lancashire County Council to establish a housing supply based on the Sub-regional Housing Market Area.

On 19 December 2011 Fylde's Local Development Framework Steering Group considered a report on 'affordable' housing (item 5). It noted that:

*"The last work on affordable housing needs was carried out in late 2007, and included an update of the 2002 Housing Needs Survey and a Housing Needs Assessment for Fylde as part of the Fylde Coast Strategic Housing Market Assessment (SHMA).*

*It is proposed that new work to review the current requirement for affordable housing consists of:*

- *An updated Housing Needs Assessment based on the standard CLG methodology and carried out in-house. This would use secondary information sources to estimate the total need across the borough and would supersede the existing estimate of need from the Fylde Coast SHMA. An initial draft Assessment is attached as Appendix 1 to this report.*
- *A new Rural Housing Needs Survey that will seek information directly from the public on their housing needs. This would also be carried out in-house, although would require temporary additional capacity. The survey would cover the rural areas of the borough, split into 4 zones, and the urban areas of Kirkham / Wesham and Warton / Freckleton. The survey would provide fine-grained information on housing needs in each locality outside of the largest urban area (Lytham St Anne's)."*

Then, on 22 May 2013 Fylde's Development Management Committee received a report that advised

*"Central government, through a series of Ministerial announcements, changes in policy and changes to legislation, has expressed a concern that the delivery of infrastructure, in particular affordable housing, secured by Section 106 agreements is stalling development and, thereby the economic recovery of the country."*

Legislation was introduced to allow developers to request to sell all housing units at market value prices if they could show the development would not be viable if the 'affordable' requirement was

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<sup>17</sup> [FBC Planning Policy Scrutiny Committee 9 October 2008 page 16]

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enforced. The legislation allowed the applicant to appeal directly to the Secretary of State against the decision of the authority or its failure to issue a decision.

Unsurprisingly, a new industry sprang up to prepare non-viability claims for developers and land agents, and the 30% 'affordable' requirement suffered a significant decline in delivery on the ground.

In December 2013 (with a final version issued in February 2014) Fylde received the "Fylde Coast Strategic Housing Market Assessment" (ED.021) which was said to have produced a NPPF-compliant SHMA to update the evidence base of housing needs and demand across the Fylde Coast.

In effect this replaced all the previous data on affordable housing need and it was said to be compliant with the latest legislation at the time.

It noted that reform of welfare payments would impact on the need for 'affordable' housing and that the authors saw two components to affordable need

- **whether - and to what extent - there was a backlog of pent-up need to be addressed in each of the Fylde Coast Authorities, and**
- **the annual extent of new need that was predicted to arise, (and it set out to address both of these over the following five years).**

### **4.3 BACKLOGGED NEED**

At Para 9.25 it noted "... that a 'backlog' of historically accumulated affordable housing need has been generated in both Blackpool and Wyre. However, this is not the case in Fylde, where there is only a very limited imbalance between supply and demand."

**In fact their findings showed a need of ONLY four 'affordable' houses a year in Fylde in order to clear the backlog over 5 years (p 144)**

Based on both Fordham and DTZ's research, Fylde's previous 'robust evidence' had shown a need for 568 to 600 affordable houses a year - but the Council had been delivering far fewer than this.

When this figure was viewed through the prism of affordable housing 'viability reductions' that had been applied to very significant numbers of dwellings on Fylde's development sites, and to the constraints of the RSS in setting Fylde's target for housing at **\*341 dwellings of all types\*** per year, I imagine the finding of a backlogged need of only 4 affordable houses a year must have come as something of a shock to Fylde's planners.

### **4.4 NEWLY ARISING NEED**

In terms of newly arising need, the 2013 SHMA report (Para 9.28) noted "*The calculation, presented in Figures 9.2, 9.5 and 9.8, demonstrates that there is a deficit of social lettings available to meet the annual level of new affordable housing need arising annually across all the Local Authorities.*"

The figure for **\*new\*** 'affordable' housing need in Fylde was given as 204 'affordable' homes a year (but because of a 'rounding' situation, the final figure was shown as a combined net need of (204+4 =) 207 'affordable' houses a year'

It should be noted that this 2013 SHMA need of 207 differed fundamentally from Fylde's previous calculations of around 600 a year.

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The report's authors took the 207 they had found as being the new annual need for affordable housing in Fylde, then reverse engineered the figures to establish (at 30% delivery) how many houses would have to be built each year for five years to deliver the 207 affordable ones that were said to be needed.

They found that Fylde would have to build 3,455 dwellings over a five year period. (equal to 691 houses a year).

This figure may not have been accurate though, because Fylde had (what some might see as) a rather curious way of calculating the numbers.

Fylde's first Interim Housing Policy illustrated their method of calculation by giving an example of a situation where a developer wanted to put the affordable houses on a different site. It said

***"E.g. where 100 market dwellings are being provided on the primary site, (at a rate of 30% affordable housing) 43 affordable dwellings (not 30) should be provided on the second site. This is to reflect the fact that 30% of all dwellings (on both sites) should be affordable i.e. 43 is 30% of 143."***

So it's possible that in some circumstances, Fylde would actually need to build something like  $(3,455+207) = 3,662$  houses over a 5 year period to deliver what Fylde's IHP considered to be 30% of the total as 'affordable' houses.

And in any case the 30% delivery rate for affordable housing was nowhere near being met because the Government had introduced the concept of viability appeals for developers who were asked to provide affordable housing. The aggressive use of such appeals meant that Fylde's 30% was never going to be met anyway.

Para 9.34 of the final 2014 version notes that (even) the 3,455 was not realistic and says *"... This is extremely unlikely to be realised and therefore this level of provision should not be reasonably expected to be realised. It does, however, highlight that there is a substantial need for affordable housing across the Fylde Coast and that planning policy will need to reflect this issue in providing for a potential uplift in provision. This is considered in more detail in section 11 of this SHMA."*

**I argue what it shows is the same thing that Fordham's research showed, that the real practical need for ADDITIONAL BUILT DEVELOPMENT is only between 1% and 10% of the 420 a year he cited in Fylde's benchmarking study.**

**The real practical need was not more than 42 affordable dwellings a year.**

And as the new evidence<sup>18</sup> shows ***"Less than 40 affordable dwellings were delivered in Fylde in 2015/16, with a long term average of 38 units per annum"***

**One has to consider why it might be that Fylde's backlogged shortage of affordable housing was found to be ONLY 4 dwellings a year when:**

- **they said they needed to provide 600 a year,**
- **they had been providing an average of 38 a year, and**
- **there was only an actual real life backlog of 4 a year!**

The need for affordable houses to be built has been, and continues to be, consistently over-stated in Fylde

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<sup>18</sup> Consultation Invitation [EL7.002 Para 2.7 and Housing Land Availability Schedule, base date 31 March 2016, Fylde Borough Council]

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In part this was due to the presence of Government Commissioners who arrived in Fylde to take charge of its housing policy around the turn of the Millennium, and because Fylde sensed a need for a housing policy change that would ensure its independent political survival.

It must also be due in part to Government - because alternative means of delivering social housing are being under-stated - or even disregarded altogether. (No account is being taken of the process by which market rents charged by private sector landlords become 'affordable' by paying housing benefit to those whose income is insufficient to fund market value rental).

Para 9.35 of the final 2014 version goes some way to shedding light on this issue when it says *"It is also important to recognise that the net need figure for affordable housing above does not reflect the role of the private rented sector in currently meeting affordable need (recognising that this tenure is not classified as affordable housing in the NPPF). In reality it is more than likely that private rented stock will continue to play a role in meeting a proportion of needs going forward and its current role is considered in more detail in the following sub-section. Some need may also be met outside of the planning system, through other methods of delivery such as grant funded schemes, which would play an important role in the delivery of affordable housing."*

If Turley are correct in this statement, what we appear to have here is the ludicrous situation where the NPPF - in denying that housing-benefit-supported-private-rentals produce housing that is affordable for those who can not afford market rents - is actually one of the point sources of the gross over-stating of need for 'affordable' homes. The NPPF's position demands more affordable homes are built than are actually needed.

## **4.5 THE LATEST EVIDENCE ON AFFORDABLE HOUSING**

And the latest evidence **STILL** does not provide the number of 'affordable' houses that the evidence demands. The annual 120 to 130 dwelling 'affordable housing' figure being settled on after considering the new evidence<sup>19</sup> has been derived not from the evidence of 'affordable' housing need, but from calculating the number of dwellings Fylde wants to see built to support the illusory level of employment growth it has set out in its vision of the future.

The 2013 SHMA<sup>20</sup> said Fylde needed 207 (or 220 based on the 'Fylde system' of calculation) 'affordable' dwellings a year.

The 2014 updated modelling<sup>21</sup> increased the overall net annual affordable housing need from 207 a year, to 249 a year which - when reverse engineered - gives a need for a total of what the report describes at Para 6.43 as being *"in excess of 800 homes per annum"* It is, in fact, 830 dwellings a year (or 1079 a year using the *Fylde system* of calculation) that need to be built in order to meet Fylde's 'affordable' housing need.

But the latest proposal<sup>22</sup> meets neither the 830 (nor the 1079) dwellings a year that are said to be necessary to meet the affordable housing needed in Fylde.

Instead - and in an admission of how preposterous these numbers **STILL** are - a number that is thought to be an acceptable number of overall dwellings has been set, and the proposal suggests that an affordable housing number which is 30% of this, and in the region of 120 to 130 dwellings a year, should be accepted.

<sup>19</sup> Consultation Invitation [EL7.002 Para 2.8] and Annex 1 Fylde Addendum 3 page 98 Para 6.45]

<sup>20</sup> ED021 – Figure 9.6

<sup>21</sup> ED022 – Paragraph Para 6.7 and 6.16

<sup>22</sup> Consultation Invitation [EL7.002 Para 2.8] and [Annex 1 Fylde Addendum 3 page 98 Para 6.43]

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This number has NOTHING to do with the 'supposed' EVIDENCE of the affordable housing need.

It is a number plucked from thin air.

How on earth can that be considered a valid rationale within a plan based on evidence?

How may it be said to be sound?

There is an ongoing and fundamental flaw in the relationship between market value and affordable housing in Fylde, and until this is corrected the numbers will NEVER be right.

Consider this:

If Fordham's stated real practical need for affordable housing in Fylde is assumed to be at the top of his estimated range in 2002 i.e. 42 'affordable dwellings' a year, and this figure is reverse engineered, the result (at 30% affordable) is that Fylde has a need for around 140 dwellings of all types. This is not anywhere near 800.

On my calculations, the most recent evidence says the reverse engineered housing need (at 30% affordable) is not 800 but 830 dwellings a year (or possibly 1,079 if Fylde's 'curious calculation' method is adopted). That's what the evidence tells us.

So how can this plan be based on evidence when it ignores it?

But the final, even bigger nail in the coffin of Fylde's fallacious affordable housing numbers is the statement in the NPPF's section 6 (*Delivering a wide choice of high quality homes*), which says:

**"47. To boost significantly the supply of housing, local planning authorities should:**

- ***use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;....."***

If Fylde's affordable housing number must meet the full, objectively assessed need for affordable housing - *which the latest evidence says is at least 249 dwellings a year* - how can it possibly be the case that 130 affordable dwellings a year are now proposed meet the requirement of the NPPF?

And if the requirements of the NPPF are not met, how may the plan be regarded as being sound?

## **5. CONCLUSIONS**

The Consultation invitation [EL7.002] itself says:

it "supports **\*forecast likely\*** employment growth" (Para 2.2). *Forecasts are not evidence.*

it "**\*provides a response\*** to market signals evidence" (Para 2.2). *Choosing a specific response is not evidence.*

**it admits the demographic evidence has been "uplifted"** (*i.e. the evidence has been modified*) - to "*recognise the importance of supporting job growth*" and to "*respond to market signals*" (Para 2.3). *As I say, these are both choices, neither is evidence.*

Para 2.6 says: "*The Local Plan is seeking to **significantly boost** the delivery of housing, as well as representing a significant uplift on the long-term historic rate of delivery.*"

This is driven directly by the Plan's 'Vision Statement' which, again, is not evidence. (*And in fact the word 'boost' - which vivified the unrecorded decision to change to a growth strategy - was only added to the Plan's Vision Statement in a late stage of the Plan. From memory I think it was just before the second public consultation the Revised Preferred Options version*)

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A 'significant boost' in housing numbers like this, should require proven justification to be credible. However, as EL7.002 (Para 2.6) goes on to say *"The purpose of these uplifts clearly being to support a positive level of employment growth in Fylde over the remainder of the Plan period."* This is a desire, not evidence.

I believe it means that Fylde expects a growth in the need for employment land that is wholly at odds with the evidence of six of the seven studies undertaken. I believe this option has been intentionally 'selected' to produce an apparent justification for an unpublished political decision to increase housing numbers, irrespective of what the real interpretation of the evidence ought to be.

I believe the **\*evidence\*** supporting the chosen option for employment land is not evidence at all.

The chosen option is based on a vision for growth – **and a vision is not evidence.**

Six of the seven methods of calculating employment land need showed either a status quo or a decline in land needed for employment. But all six of these calculations were discounted in favour of one that demonstrated growth in the need for employment land.

This is eloquently explained in Minority Report 2<sup>23</sup> where one critic of Fylde's selective application of the studies was told *"Paragraph 10.39 of the FELPS explains why BE Group have recommended using the historic take-up trends. Ultimately, in other comparable local authority areas they have discounted the use of employment and labour supply models which have generated unusually negative outcomes. **From a Fylde perspective negative outcomes do not square with the vision in the Fylde Local Plan to 2030, Part 1 - Preferred Options (June 2013)**"*(my emphasis)

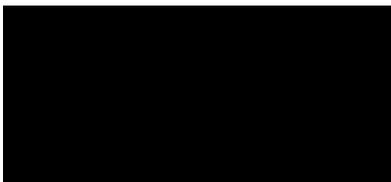
The calculation of Fylde's employment land need has employed the wrong methodology to produce this result. The broader evidence in this regard shows it to be an unreliable selection made from conflicting evidence.

The overall housing numbers (which, in part, Fylde uses to justify with the same evidence) are also therefore unreliable.

And the mis-calculation of 'Affordable Housing' numbers in Fylde is little short of a scandal. This mistake has dogged Fylde's housing requirement for 15 years. The evidence on affordable housing was manipulated to ensure the Council's political survival, and has nothing to do with reality.

Furthermore, the NPPF's current requirement for Fylde to **meet the full, objectively assessed need for affordable housing** is not anywhere near being complied with by these latest proposals. The plan seeks to provide only about half of the evidence-based need for Affordable Housing .

How such a plan might be considered 'sound' is beyond my comprehension.



(Ref No: 14)

Dated:

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<sup>23</sup> Minority Report 2: Page 7 Para 43 (v) [Examination document SD013c-Part3, Submission 37 page 1045]

