

WYRE LOCAL PLAN EXAMINATION

STATEMENT BY WYRE BOROUGH COUNCIL ON THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 3 **Housing and Employment Objectively Assessed Needs (OAN) and Requirements**

Issue 1 – The Housing OAN

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

1.1.1 Yes it does.

1.1.2 The 2014 Strategic Housing Market Assessment (SHMA)¹ and the subsequent Addendum updates² – including the most recent Addendum 3 report³, published in August 2017 – have consistently followed the methodological steps for calculating the OAN as set out within Planning Practice Guidance (PPG). The 2014 SHMA⁴ and its first Addendum⁵ were jointly commissioned by the Fylde Coast authorities, and formed part of the Local Plan evidence base examined in both Blackpool and Fylde. Subsequent addendums for Fylde and Wyre have shared a broadly common approach albeit they have been prepared to a different timetable.

1.1.3 Each successive update to the 2014 SHMA has sought to take account of the latest published datasets and interpretation of the NPPF and PPG as demonstrated through legal judgments and Local Plan Inspectors' conclusions. This highlights that the PPG requires a level of interpretation and judgement in applying the methodology and in the final conclusion of an OAN.

1.1.4 The SHMA and the Addendums have also been updated as necessary to ensure consistency and alignment with other parts of the Council's evidence base, most notably its economic evidence. It should be noted that the methodology in the SHMA and the subsequent Addendums is consistent across all three Fylde Coast Authorities. It has formed the basis for Blackpool's adopted Core Strategy and for the Fylde Local Plan which has reached a post submission modifications stage.⁶

¹ Submission Document Library Reference ED085

² Submission Document Library Reference ED086 and ED087

³ Submission Document Library Reference ED088

⁴ Submission Document Library Reference ED085

⁵ Submission Document Library Reference ED086

⁶ Fylde Council published proposed modifications to the Fylde Local Plan on the 8th February 2018. Consultation ended on 22 March 2018.

- 1.1.5 The OAN of 479 dpa formed the upper end of the OAN range concluded within the Addendum 2 report⁷. This Addendum was commissioned to update the evidence presented in the 2014 SHMA⁸ and the Addendum 1 report⁹ to take account of the then-latest official household projections (2012-based SNHP) and the Employment Land Study Update (ELSU)¹⁰ and subsequent Addendum¹¹. An OAN range of 400 – 479 dpa was concluded. It was noted that this fell within the original wider OAN range identified within the 2014 SHMA (340 – 485 dpa).
- 1.1.6 The OAN range presented in the Addendum 2 report took into account positive demographic adjustments to address evidence of suppressed younger household formation rates, evidence of a modest worsening of market signals and the impact of a notable fall in annual housing supply over more recent years on the official population projections. The concluded range, however, was based on a calculation of the level of housing needed to support the forecast level of job growth identified within the Council's evidence. The established range recognised the sensitivity involved in forecasting future labour-force behaviour and the implications of a projected ageing of the borough's population. In the context of an appreciation of these aspects, and the calculated need for affordable housing, it was recommended that emphasis be placed on the upper end of the OAN range in planning for the provision of housing¹².
- 1.1.7 The OAN figure of 479 dwellings was used by the Council to prepare the 'Publication' draft Wyre Local Plan.
- 1.1.8 In 2017, the Council commissioned a third Addendum (Addendum 3¹³). This took account of the latest available datasets and established the implications for the OAN of 479 dpa which was used by the Council to prepare the Publication draft Wyre Local Plan. The Addendum 3 report took full account of the 2014-based sub-national population and household projections (SNPP/SNHP) as well as the Council's Addendum II to its Employment Land Study (ELS Addendum II¹⁴) which had been commissioned in parallel.
- 1.1.9 The Addendum 3 report validated the continued justification for the application of comparable adjustments to the most up-to-date official demographic projections (2014 SNHP) – to take account of longer-term historic trends and a recovery of the household formation rates of younger households – as well as the application of a separate supply-led adjustment (5%) to respond to evidence of a limited worsening of market signals.
- 1.1.10 In calculating the OAN the Addendum 3 report acknowledged the conclusions of the ELS Addendum II report which forecast of strong job growth over the

⁷ Submission Document Library Reference ED087

⁸ Submission Document Library Reference ED085

⁹ Submission Document Library Reference ED086

¹⁰ Submission Document Library Reference ED105

¹¹ Submission Document Library Reference ED106

¹² Submission Document Library Reference ED087, paragraph 6.49

¹³ Submission Document Library Reference ED088

¹⁴ Submission Document Library Reference ED107

remainder of the plan period (2015 – 2031). In order to support this level of job growth, it was concluded that there would be a minimum need for 415 dwellings per annum. It was acknowledged that the underlying population projections implied by this level of provision would continue to result in a modest decline in the working age population (16 – 64 years) over the plan period. Such a scenario was seen to represent a potential risk in constraining future job growth in the Addendum 2 report. On this basis, it was concluded that allowing for a degree of flexibility in the level of housing needed to support job growth continued to be reasonable and justified to ensure that forecast job growth and future investment is not unduly constrained by housing provision.

1.1.11 On this basis the conclusion was reached that a minimum OAN of 457 dpa reflected the most up-to-date demographic, economic and market signals evidence. This level of provision was also considered to be able to support a significant boosting of the supply of affordable housing which would positively respond to the scale of identified affordable housing needs.

1.1.12 In considering the implications of the updated evidence, the Addendum 3 report acknowledged the uncertainties involved in forecasting future labour-force behaviours, as well as the required application of professional judgement in judging the reasonableness of a market signals adjustment. Accounting for a degree of flexibility in this regard, it was concluded that the upper end of the OAN range identified in the Addendum 2 report (479 dpa) remained a reasonable upper limit of the full need for housing in Wyre. This reflects a high degree of consistency in the scale of assessed need in Wyre through the SHMA evidence base, including the range originally identified in the 2014 SHMA, reaffirming its robustness following the application of the PPG methodology.

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

1.2.1 No it should not be higher.

Supporting job growth

1.2.2 The response to Question 1.1 confirms that the SHMA evidence has taken full account of the need for housing implied when supporting job growth. This has involved taking account of the Council's evidence on the likely change in job numbers in Wyre, as concluded within the ELSU¹⁵ and subsequent Addendums¹⁶.

1.2.3 In the Addendum 2 report, it was concluded that the supply of working age economically active residents (the labour-force) under the demographic projections was lower than the projected job growth concluded in the ELSU and ELSU Addendum 1. A positive adjustment was applied on this basis to

¹⁵ Submission Document Library Reference ED105

¹⁶ Submission Document Library Reference ED106 and ED107

provide the housing needed to support the anticipated growth in jobs. This took the form of a range of housing need (400 – 479 dpa) reflecting the integration of variant labour-force behaviour assumptions acknowledging the uncertainties in forecasting these aspects over a plan period and the acknowledged issues relating to the projected ageing of the authority's labour-force.

- 1.2.4 As acknowledged in the response to Q1.1, it was recommended that emphasis be placed upon the upper end of this range, which subsequently formed the OAN referenced within the Publication and Submission Drafts of the Plan (479 dpa). This recognised in particular that the working age population of Wyre was projected to fall at the lower end of the range (400 dpa), representing a potential risk to supporting the scale of job growth implied within the ELSU. It was also noted that the lower end of the range fell below the upper end of the range of demographic projections modelled, which again presented a risk that it would under-estimate the potential full need for housing.
- 1.2.5 The Addendum 3 report revisited the consideration of the scale of housing need implied as being required to support the updated forecast of job growth presented within the ELSU Addendum 2 report¹⁷. The supporting analysis identified that **a minimum of 415 dpa would be required to support the forecast growth of 160 jobs per annum**¹⁸. This was based on the integration of reasonable and updated assumptions around future labour-force behaviour in the context of the views of Inspectors in a number of Local Plan examinations and S78 Inquiries¹⁹.
- 1.2.6 Reflecting the justification for the Addendum 2 report's emphasis on the upper end of its range, consideration was given to the implications of providing 415 dpa on the age profile of the population. It was identified that such a level of provision would be likely to result in a modest continued decline in the working age population of Wyre. This supported the retention of a level of flexibility in identifying an OAN which was higher than this implied minimum need. It does not, however, suggest that the forecast level of job growth could not be supported through provision of 415 dpa.
- 1.2.7 A sensitivity scenario was presented which applied a more prudent set of labour-force behaviour assumptions, primarily relating to the forecast changes in the economic activity rates of different age groups, including those older cohorts in the workforce. This implied that up to 513 dpa could be required to support the same level of job growth (160 jobs per annum). However, in stark contrast to the 415 dpa scenario, this was predicated on the working age population increasing significantly (by approximately 3,400 persons), with this

¹⁷ Submission Document Library Reference ED107

¹⁸ Submission Document Library Reference ED088, paragraph 4.15 it is noted that the modelling uses a 2015 base date with this scale of job growth forecast over the period 2015 – 2031. Over the full plan-period due to the integration of historic job losses prior to 2015 the ELSU Addendum II report presents a forecast growth of 1,345 jobs over the period 2011 – 2031.

¹⁹ Submission Document Library Reference ED088, paragraph 4.17

reliant on a notably higher level of net migration²⁰. It was considered that this was likely to overstate the implied impact of job growth on migration when considering both the scale and types of jobs forecast to be created and when compared to the full range of demographic projections presented.

- 1.2.8 A degree of flexibility in the identification of the OAN was, however, concluded as continuing to be reasonable to allow for uncertainties in relation to the modelling of future labour-force behaviours. It was considered that **the upper end of the OAN range concluded in the Addendum 2 report (479 dpa) would provide this flexibility in accommodating and supporting future job growth as well as accommodating the full range of demographic projections and a market signals adjustment**. It was considered that there was not an adequately evidence-based justification for suggesting that the need for housing would be higher. Provision at this level would ensure that all of the demographic projections would be met, and likely avoid a marked and sustained fall in the borough's working age population which would risk supporting job growth.

Supporting the delivery of affordable housing

- 1.2.9 The SHMA evidence has consistently identified a need for affordable housing in Wyre. Addendum 3 presents the most recent calculation and identifies an annual need for 134 affordable homes over the next five years. This acknowledges the Council's identified significant existing pipeline of affordable housing supply, estimating the delivery of some 572 affordable homes within the next five years²¹. Assuming this pipeline is delivered within this timeframe the Addendum 3 report calculates that an estimated 189 affordable homes will be needed each year thereafter. Meeting this need in full would require an almost fourfold increase in the average level of affordable housing delivery seen historically in the borough²².
- 1.2.10 The PPG does not explicitly specify how the OAN should be adjusted with regards to the calculated affordable housing need. The PPG does make clear that the need for affordable housing should be '*considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments*'²³.
- 1.2.11 The SHMA evidence has consistently considered this relationship, albeit it has recognised that there is a complex relationship between affordable housing provision and market housing²⁴ as a result of the different methodological

²⁰ Submission Document Library Reference ED088, figure 4.4 compares the resulting age profile of the populations modelled through the application of the variant labour-force behaviours in supporting the growth of 160 jobs per annum.

²¹ As referenced in ED088 (paragraph 6.10) this is based on the Council's analysis of housing commitments as of March 2017.

²² Submission Document Library Reference ED088, figure 6.1 confirms that on average 49 affordable homes have been delivered each year within Wyre between 2004/05 and 2016/17.

²³ PPG Reference ID: 2a-029-20140306

²⁴ Submission Document Library Reference ED087, paragraphs 6.35 and 6.36 and cross-referred at paragraph 7.23 of ED088

approaches prescribed in the PPG for arriving at an estimate of affordable housing need. The Addendum 3 report illustratively identified – on the basis of an assumption that 25% of homes provided would be affordable – an annual requirement for 756 homes to facilitate the delivery of sufficient affordable housing to meet the long-term need for 189 affordable homes per annum. It was observed that this level of implied provision would exceed by some way the highest levels of completions seen in the recent historical period in Wyre²⁵. It is also of note that achieving the Local Plan’s proposed housing requirement would itself represent a notable step-up from the historic levels of completions observed back to 2003, with an average of 265 dwellings completed per annum up to 2017.

1.2.12 The importance of considering affordable housing needs in determining the OAN has been recognised by the High Court, but there is acknowledgement that neither the NPPF nor the PPG require affordable housing need to be met in full:

“The Framework makes clear these needs should be addressed in determining the... [FOAN] but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice. This is because the vast majority of delivery will occur as a proportion of open-market schemes and is therefore dependent for its delivery upon market housing being developed”²⁶

1.2.13 This judgment has been recently upheld by the Court of Appeal, which acknowledged that the need for affordable housing and the OAN were products of ‘separate and different calculations and assessments’ with some overlap inevitable. It confirmed that:

“Planning judgment [is] required in gauging a suitable uplift to take account of the need for affordable housing, without either understating or overstating that need”²⁷

1.2.14 This is evidently the case in Wyre, where the indicative need for affordable housing in the context of open-market delivery would imply an overall housing figure which this planning authority, has on the basis of historic precedent at least, a very limited prospect of delivering in practice and would be significantly in excess of the projected growth in households under any of the demographic projections. The OAN encapsulates positive adjustments to the demographic projections which seek to address the evidenced implications of worsening affordability in the form of an assumed recovery of younger persons’ household formation rates and a separate market signals

²⁵ Submission Document Library Reference ED088, paragraph 7.20. For reference historic rates of development were shown graphically at Figure 5.3 of the same document.

²⁶ [2015] WHC 2464 (Admin): Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government; ELM Park Holdings Ltd

²⁷ Jelson Ltd v Secretary of State for Communities and Local Government and Hinckley and Bosworth Borough Council [2018] EWCA Civ 24, paragraph 36

adjustment. It is also noted that an OAN of 479 represents a 69% adjustment from the 'starting point' of the 2014-based SNHP (283 dpa)²⁸.

1.2.15 Outside of the impact and scale of adjustments applied in the derivation of the OAN, it is also evident that the Council's evidence highlights constraints in achieving the OAN. There is therefore no reasonable justification for suggesting an uplift to the housing requirement beyond the OAN on the basis of supporting the provision of affordable housing.

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?*²⁹

1.3.1 No it should not be.

1.3.2 The OAN concluded in the SHMA evidence base has been calculated following the current PPG methodology. At the current point in time this remains the Government's formal published guidance to which local plan-makers are required to take account.

1.3.3 The Government published a draft revised NPPF for consultation in March 2018. The Government has also published draft PPG as part of the consultation. These include the proposed introduction of a new standard method for calculating local housing need. The proposed method is broadly comparable to that consulted upon by the Government in its consultation on 'planning for the right homes in the right places' which concluded in November 2017³⁰. The Council acknowledges that the indicative OAN for the borough, published as part of this consultation, implied a minimum need for 313 dpa over the period 2016 to 2026.

1.3.4 This figure is some 166 dpa lower than the OAN concluded in the Council's evidence base.

1.3.5 This is a result of the simplified nature of the proposed standard method, which establishes the 'minimum' need figure on the basis of only two inputs; the official trend-based household projections and a formulaic adjustment to take account of the relationship between median house prices and earnings. In contrast to the current PPG, the proposed standard method does not explicitly require an adjustment to be made to take account of supporting future forecast job growth. The proposed standard method does not, however, preclude a Council from applying adjustments to the demographic projections where it considers there to be 'exceptional circumstances'. It equally recognises that some circumstances will justify a higher need figure than suggested by the standard method, which 'relies on past growth trends and

²⁸ Submission Document Library Reference ED088, paragraph 7.35

²⁹ <https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework>

³⁰ DCLG (2017) Planning for the right homes in the right places: consultation proposals

*therefore does not include specific uplift to account for factors that could affect those trends in the future*³¹.

- 1.3.6 Support is also given within the draft PPG to the presentation of housing need as a range where such a justification exists. The draft guidance does not provide an exhaustive list of the circumstances in which such an uplift is justified, but cites the existence of growth strategies and planned improvements in strategic infrastructure as examples.
- 1.3.7 Irrespective of the indicative OAN arising from the standard method and its potential future application, it of note that the consultation on the draft revised NPPF and draft PPG is ongoing until 10 May 2018. There is no guarantee as to the final form of either the proposed standard method for calculating local housing need, or indeed its inclusion within the revised NPPF.
- 1.3.8 Equally, were it to be advanced in its current form, the revised NPPF provides a clear set of transitional arrangements to support its implementation.
- 1.3.9 The documentation published on 5 March 2018 to inform this consultation confirms that *'policies in the previous Framework will apply for the purpose of examining plans where those plans are submitted on or before'* the date which is six months after the date of the revised NPPF's final publication³². The Government's intention to finally publish the revised NPPF *'before the summer'*³³ suggests that Local Plans submitted before the end of this year are expected to be examined based on existing policy and guidance, including the existing PPG and its stepped approach to calculating housing needs.
- 1.3.10 On the basis of the draft transitional arrangements, it is evident that the Government does not expect the Council to update or adjust its evidence with regards to housing need during the ongoing process of examining the submitted Local Plan.

Issue 2 – The Employment OAN

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

2.2.1 Yes it does.

2.2.2 The Council considers that the OAN is supported by robust and credible evidence. The Wyre Employment Land Study Update Addendum II 2017, (ELUA II)³⁴ using the latest 2017 Experian economic forecast recommend an OAN range of between 32 – 47 ha.

2.2.3 The Adjusted Experian Forecast Scenario indicates that in order to support projected job creation over the Plan period, there is a requirement for the provision of 32ha of employment land. This is to provide new job growth of

³¹ MHCLG (2018) Draft Planning Practice Guidance, page 26

³² MHCLG (2018) National Planning Policy Framework: draft text for consultation, Annex 1

³³ MHCLG (2018) National Planning Policy Framework: consultation proposals, p6

³⁴ Submission Document Library Reference ED107

+1,345 jobs (net) between 2011 and 2031, of which 326 are B-Class use jobs. As set out in the ELUA II³⁵ an adjustment to the Experian data was made to reflect the significant job losses in Public Administration and Defence sector at the Norcross DWP site, which had not been adequately factored into the baseline projections. A further adjustment is also made to the energy and chemical sector to reflect the likely net additional job growth of 245 jobs resulting from the Hillhouse Technology Enterprise Zone. This job growth in energy and chemical sector are confirmed job creation that is expected to be new to the borough and is considered conservative in light of further anticipated growth in the sector during the Plan period.

- 2.2.4 Sensitivity testing of the Experian projection were undertaken in 2015³⁶. This considered two additional econometric job projections from Oxford Economics and Cambridge Econometrics. The assessment concluded (section 4.0, page 19-20) that the Experian dataset in light of the sensitivity testing presents a robust basis for the forecasting of the future employment requirement.
- 2.2.5 On the basis of the 'Past Take Up Scenario' plus a reasonable allowance for losses and a margin of choice (or flexibility factor), the employment land requirement at the upper end of the revised OAN range is 47 hectares.
- 2.2.6 Whilst the Adjusted Experian forecast (32ha) will provide land to support projected job creation over the Plan period, this scenario will not necessarily support existing businesses which may not create new jobs but may require additional employment land to support their existing business. Existing businesses need to remain competitive and often need to expand. The expansion of existing businesses can often secure the long term operation of an existing business and thus safeguard existing jobs.
- 2.2.7 It is considered appropriate to consider past take up in determining the employment land requirement. In Wyre, the past take-up scenario (excluding flexibility factor) identifies a need for 43ha of B-Class employment land over the 20-year plan period (excluding an allowance for the flexibility factor)³⁷. This past take-up scenario is based upon updated employment monitoring data produced by the Council following a monitoring review³⁸ which has been back dated to the start of the Plan period. Whilst it is acknowledged that this covers six complete monitoring years and does not cover a complete development cycle, this period of time covers post-recession and may be conservative and not reflective of longer term trends.
- 2.2.8 It should be noted that the three Fylde Coast authorities (Wyre, Blackpool and Fylde Council) have a shared Functional Economic Market and travel-to-work area. Both Blackpool Council in its adopted Core Strategy (2016) and Fylde

³⁵ Submission Document Library Reference ED107, paragraph 2.26-2.43, pages 11-14

³⁶ Submission Document Library Reference ED106

³⁷ Submission Document Library Reference ED107, Table 4.8 page 34

³⁸ Wyre Council undertook a review of the council's employment monitoring to update and refine its approach. Historically, the Council had only monitored employment floorspace take-up on unallocated sites and for the purposes of 2012 and 2015 Employment Land Study, the square metre floorspace was converted to hectare take-up using a 40% plot ratio (see ED103, table 6.1, page 45).

Council in its 'Submission' Local Plan (2017) base their employment OAN on past take-up, projecting forward historic average annual take up over the plan period. In the case of Blackpool Council, a 20% flexibility allowance is also added.

- 2.2.9 It is considered that the past take-up scenario without flexibility (43ha) will provide sufficient levels of B-Class employment land to accommodate the projected levels of job creation and support existing businesses to allow for sustainable levels of growth without constraining the market. This approach is also consistent with the approach taken by the two neighbouring authorities that share a joint economic market. It is also consistent with the NPPF's requirement that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change [paragraph 14]. It also aligns with the Government's objective for the planning system to do '*everything it can to support sustainable economic growth*' [para 19].
- 2.2.10 The Past Take up scenario (without flexibility) is considered to set a realistic level of employment growth for the Plan period to support job creation and existing businesses.

Issue 3 – Alignment between housing and employment OAN

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

3.1.1 Yes there is.

3.1.2 The Addendum 2 Report³⁹ takes into account the findings of the 2015 Employment Land Study Update⁴⁰. Similarly the Addendum 3 Report⁴¹ takes account of the Employment Land Study Update Addendum II⁴² which provides updated evidence of likely job growth based on the 2017 Experian Forecasts. There is therefore alignment between the housing and employment evidence base which has informed the housing and employment OAN figures.

Issue 4 – The Housing Requirement of 8,225 dwellings

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

4.1.1 Yes it does.

4.1.2 The NPPF explains 'positively prepared' in paragraph 182 (first bullet point) as a strategy that seeks to meet objectively assessed development and infrastructure requirements.

³⁹ Submission Document Library Reference ED087

⁴⁰ Submission Document Library Reference ED105

⁴¹ Submission Document Library Reference ED088

⁴² Submission Document Library Reference ED107

- 4.1.3 Although the Council consulted on three strategic options⁴³ in 2015, it became apparent as evidence on highway capacity was emerging that when considered together with extensive areas of flood risk in Wyre, the options to the Council on how to accommodate growth will be limited. The final highway capacity evidence⁴⁴, prepared by Lancashire County Council has placed maximum limits on the scale of residential development that could be accommodated in individual settlements taking into account deliverable mitigation. In order to maximise opportunities in accommodating development needs the Council undertook a local review of the Green Belt in Wyre⁴⁵. There were also three call for sites exercises⁴⁶ 2012, 2014 & 2015. The sites that came through the call for sites in 2012 and 2014 were publicised in the Issues and Options Report in 2015. Where the ‘call for sites’ did not generate sufficient available land in the places where development could be accommodated, the Council identified potential sites and contacted landowners as to the availability of land – this was the case in Forton and Great Eccleston.
- 4.1.4 The Council held meetings with all infrastructure providers to understand the implications for infrastructure from development. This fed into the Infrastructure Delivery Plan⁴⁷ in the first instance and subsequently into individual allocation policies.
- 4.1.5 The Sustainability Appraisal (SA)⁴⁸ process was an integral part of the preparation of the Local Plan to ensure that the most sustainable options were taken forward. (See also response to Matter 1 Issue 3).
- 4.1.6 The Local Plan maximises opportunities within constraints to accommodate development. It has allocated to the maximum ceiling supported by the highway evidence in individual settlements including some of the smaller settlements in the Borough. It is considered that there is no justification that would prevent smaller settlements growing to accommodate development needs provided that provision is made for supporting infrastructure. The Local Plan includes measures to ensure that growth is carried out in a well-planned manner, requiring thus in many instances the preparation of a masterplan, the provision for employment and local facilities. It is evident that the Wyre Local Plan has been positively prepared in line with paragraph 182 in the NPPF.

4.2 Are the highway constraints overstated?

- 4.2.1 No, they are not.

⁴³ Submission Document Library Reference ED054

⁴⁴ Submission Document Library Reference ED094a&b

⁴⁵ Submission Document Library Reference ED109a-d

⁴⁶ 2012 (for any use), 2014 (for any use), 2015 (Gypsy & Traveller and Travelling Showpeople). See Statement of Consultation (section 5 – pages 12-15) (Submission Document Library Reference - SD007a)

⁴⁷ Submission Document Library Reference ED004

⁴⁸ Submission Document Library Reference SD005a&b

- 4.2.2 Within Wyre, Lancashire County Council (LCC) is the local highway authority responsible for the local highway network. Highways England (HE) are responsible for the strategic road network which in Wyre includes the A585(T) which runs from junction 3 on the M55 to Fleetwood.
- 4.2.3 Evidence prepared by HE⁴⁹ shows that junctions on the A585 already operate at capacity and would require improvements to facilitate developments namely Victoria Road roundabout, Norcross roundabout, Skippool roundabout, Shard Bridge junction, Singleton lights junction, Thistleton junction and M55 junction 3.
- 4.2.4 LCC has assessed the capacity of the local highway network from an operational and safety perspective at an appropriate level and has also considered appropriate and deliverable mitigation that would increase the capacity of the network to support development. LCC has taken account planned improvements to the A585(T) by HE and the benefits that they release. It should be noted that the assessment for the purpose of the Local Plan is not a detailed transport assessment as would be carried out for a planning application. The highway evidence is part of a proportionate evidence base as advised in NPPF paragraph 158. It uses best and suitable information on the existing traffic situation and projected future traffic growth at a point in time.
- 4.2.5 National policy requires that Local Plans should be 'effective' and 'justified'⁵⁰ 'Effective' refers to being deliverable over the plan period, and 'justified' to being the most appropriate strategy based on proportionate evidence.
- 4.2.6 The evidence⁵¹ prepared by LCC concludes that the highway network in Wyre is reaching and in several areas has already reached a critical point where additional traffic can no longer be accommodated without resulting to unacceptable severe impacts.
- 4.2.7 With regards to the A6 corridor the main issue is the ability of the M55 junction 1 to accommodate development traffic. Currently traffic queues from the westbound off slip onto the mainline link creating safety and operational concerns. Consequently restriction zones have been defined depending on the proximity and propensity to use the M55.
- 4.2.8 With regards to the Peninsula the main issue is pinch point junctions on the A585(T) which in turn results in traffic queuing on both the strategic and local network approach arms that these junctions have. Thornton, in particular, is affected by pinch point junctions at Victoria Road, Norcross and Skippool, resulting in significant queues which currently cause significant concern. In relation to Poulton-le-Fylde⁵² a bespoke assessment has demonstrated junctions operating above capacity. Thus only limited development can be supported without raising concerns of significant impact.

⁴⁹ Submission Document Library Reference SD090-092

⁵⁰ NPPF paragraph 182.

⁵¹ Submission Document Library Reference ED094 a&b

⁵² Submission Document Library Reference ED096

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?

4.3.1. Yes it would.

4.3.2 This is demonstrated in the evidence prepared by Lancashire County Council⁵³ and Highway England which is summarised above under question 4.2. The evidence is based on the best and suitable information on the existing traffic situation and projected future traffic growth available at a point in time.

4.3.3 It should be noted that as the Council must prepare a Local Plan that it is deliverable, the level of development accommodated in the Local Plan is the appropriate level supported by commensurate evidence on constraints including highway constraints, which can be delivered with a reasonable level of certainty.

4.4. What are the prospects of improvements in highway and transport infrastructure being delivered so that housing and other needs can be fully met?

4.4.1 There is relative certainty that identified highway and transport improvements to support the level of development proposed in the Local Plan will be delivered. The identified improvements are deliverable and cost effective but would not support delivery of the full housing OAN.

4.4.2 The improvements set out in the Poulton-le-Fylde Highway Mitigation Strategy (Appendix C in the Local Plan) and the A6 Corridor Highway Mitigation Strategy (Appendix D in the Local Plan) will be funded through developer contributions in relation to developments in Poulton-le-Fylde and along the A6. Allocated sites with planning permission in those two areas have already contributed towards these two mitigation strategies as appropriate. The benefits resulting from these improvements have been incorporated into the highway assessment.

4.4.3 Highways England (HE) are delivering a major improvement scheme on the A585(T) between the Windy Harbour junction to Skippool roundabout. Although the funding is in place, it is subject to a Development Consent Order (DCO); the DCO application is expected to be submitted this autumn. The scheme is scheduled to be completed in 2022. This will result in improvements to three junctions on the A585(T). As set out in the Infrastructure Delivery Plan (IDP)⁵⁴, HE has also secured funding for improvements to Norcross roundabout. The resulting benefits from

⁵³ Submission Document Library Reference SD094 a&b

⁵⁴ Submission Document Library Reference ED004

improvements on the A585(T) have been included in the highway assessment.

4.5 *Would a different distribution of development avoid severe highway impacts and allow the LP to meet housing needs?*

4.5.1 No it would not.

4.5.2 The highway evidence⁵⁵ has considered the maximum that could be accommodated in Wyre in any one settlement taking into account safety and operational capacity with deliverable mitigation, as set out in Appendices C & D in the Local Plan and the Infrastructure Delivery Plan⁵⁶. The Local Plan has allocated land in the various settlements reflecting the maximum capacity with the exception of Pilling, Fleetwood and Cleveleys.

4.5.3 Pilling lies in Flood Zone 3 and has been ranked as unsuitable for development (red) in the Strategic Flood Risk Assessment (SFRA) Addendum⁵⁷ (chapter 3 and table pages 484-486). Where sites are located mainly or wholly in flood zones 2 and 3, and are subject to high levels of flood risk, and/or development of the site may restrict or prevent future options for flood risk management (including setback of defences and natural flood plain management) they are to be classed as unsuitable for development. The entire settlement lies within Flood Zone 3 subject to high levels of flood risk. Currently there is no guarantee of additional funding towards maintenance of flood defences. Under DEFRA's current methodology it is unlikely that there will be additional public funding in the future for Pilling. The additional quantum of development that would have been supported at Pilling by the highways evidence is 50 dwellings which in itself could not fund improvements to flood defences.

4.5.4 With regards to Fleetwood and Cleveleys, further deliverable sites could not be identified over and above the allocations made. There are no allocations at Cleveleys which is built out.

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

4.6.1 No there is not.

4.6.2 The shortfall of housing does not relate to the lack of land but highway capacity apart of the case of Fleetwood and Cleveleys.

4.6.3 With regards to Cleveleys there is no employment allocation. There are two existing employment areas that are covered by policy EP2 and shown on the Policies Map. The first is St Georges Lane within the town centre on its southern boundary and the second is Dorset Avenue. These are the only

⁵⁵ Submission Document Library Reference SD094 a&b

⁵⁶ Submission Document Library Reference ED004

⁵⁷ Submission Document Library Reference ED112

employment areas at Cleveleys and are fully occupied. Their release for housing would not be appropriate.

- 4.6.4 With regards to Fleetwood the only employment allocation is mixed use site SA3/1 - Fleetwood Dock and Marina. The employment allocation is 7.5 hectares but the policy requires that it should deliver new accommodation for the existing fish and seafood industries at the Dock. The net allocation is around 3.2 hectares. The proposed mix on SA3/1 is considered appropriate. In addition to the 120 dwellings allocated on the site, a further 336 dwellings have been developed at the Dock in recent years. Fleetwood includes some of the most deprived areas in the Borough and therefore economic development and job creation is important to the regeneration of the town.
- 4.6.5 Copse Road is an existing employment area in Fleetwood identified under Policy SP2. Copse Road Employment Area is a long and narrow area of land between the tram line and the A585(T). The 2012 Employment Land and Commercial Leisure Study⁵⁸ concluded that the estate should retain its employment land protection (paragraph 9.76). The majority of the area is occupied with a vacant site in the centre of the estate that it is not considered suitable for housing. (See also Council's response Matter 6, Issue 1 question 1.2)

⁵⁸ Submission Document Library Reference ED103