

## Comments on Wyre's response to the Inspectors Preliminary views 24.4.18

*Under Matter 3, in response Wyre state: "The employment land OAN is based on the 'Experian adjusted scenario' which would require 415 dwellings (ED088 - SHMA Addendum III section 4, page 23). The higher housing OAN figure of 479 is justified by demographic considerations." (Para 30)*

Wyre state that the Housing OAN figure of 479 houses is justified by demographic reasons. This is not consistent with the SHMA, which clearly states that the OAN range of 400 to 479 dwellings per year is the result of the **forecast level of job growth** within the ELSU (refer para 6.46 – extract below). If the forecast requirement for employment land has been reviewed and reduced since this report, then surely the forecast need for housing needs to be reviewed. Throughout the SHMA the employment data is relied upon, and to dismiss it now as irrelevant, and rely only on demographic evidence, defeats the object of carrying out the SHMA in the first place.

Together with the consultation document issued in September 2017 called 'Planning the right homes in the right places', in which the DCLG recommend, amongst other things, a standard method of calculating local authorities' housing need, where they have arrived at a figure of 313 dwellings per year, it is clear that the OAN figure cannot be seen to be robust or even accurate.

The OAN of 479 dwellings per year is based on outdated information and should be fully reassessed before using it as the fundamental basis for housing policy in Wyre for 20 years.

A Cutts  
24.4.18

### Extract from SHMA

6.46 Supporting the adjusted Experian forecast level of job growth within the ELSU requires a further uplift. This reflects the ageing population of Wyre, which impacts on the future size of the labour force. The analysis has considered a range of labour force sensitivities, which suggests – as a minimum – that 400 dwellings per annum would be needed to support job growth. The range, however – recognising the uncertainties in aligning jobs and houses – extends to 479 dpa, which represents a scenario which does not directly make more marked changes to older persons economic activity rates. This range aligns with the conclusions of the ELSU, although it is noted within this assessment that a higher level of job growth – based on a Policy On scenario or higher job growth forecast by Oxford Economics as referenced in the ELSU Addendum – could generate a greater need for housing if achieved.