

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****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 for 479 dwellings per annum (dpa) or 9580 dwellings for the Local Plan Period?

- 1.1.1 Whilst in the early stages of plan preparation, housing needs evidence was collated and assessed housing needs across the Fylde Coast Housing Market Area (through the Fylde Coast SHMA), the most recent assessment of housing needs considers the needs of Wyre only. As a result, there is evident disparity in the assessment of housing need undertaken for the Wyre Local Plan in comparison to the Blackpool Core Strategy (now adopted) and the Fylde Local Plan (at the latter stage of examination) despite being the same housing market area. The effects of this in securing the necessary amount of housing and economic investment for each borough within the housing market area is unclear.
- 1.1.2 The latest assessment of housing need for Wyre is set out in the Wyre Addendum 3: OAN Update (published September 2017). The update was produced following the publication of the latest Employment Land Study Update (Addendum II) and takes into account its findings.
- 1.1.3 The use of the 2014 SNHP as the basis for the assessment is sound given that this was the most recent available demographic evidence base at the time of publication. A thorough examination of this evidence base and its suitability in providing an accurate assessment of the demographic housing needs of Wyre is also provided. Adjustments are made on account of constrained household formation which remain evident in projections, and on the basis of previous trends in migration. The result indicates a need for between 351 and 435 dwellings per year to respond to demographic needs. Our Client agrees with the report's conclusions that the demographic needs of Wyre are within this range.
- 1.1.4 An assessment of Market Signals is also included within the supporting evidence. The report tests six market signals, finding Wyre to experience evidence of market suppression with evidence on increases in concealed families. An arbitrary 5% increase to the housing requirement is recommended by the Report in response. This 5% increase is based on a mid-

point adjustment in comparison to authorities which experience similar rates of unaffordability in previous local plan examinations (sampled at between 0 and 9%).

- 1.1.5 Whilst our Client supports the recognition within housing evidence to increase the housing requirement in response to market signals, our Client questions the actual effectiveness of the uplift proposed. There is no discussion within the report as to how the uplift in housing proposed will address the problem of concealed households (the market signal deemed to be constrained). Whilst the affordability of housing stock may be one problem behind this, such households may not be in a position to purchase housing in general. These households may therefore need alternative means of tenure to be provided in order for this to be addressed. Our Client therefore believes that this evidence suggests a greater priority for the Council to deliver its affordable housing need.
- 1.1.6 Updated employment evidence illustrates that the predicted employment growth of the Borough is reduced from the previous assessment. The employment evidence takes into account the assumed job growth at the Hillhouse Technology Enterprise Zone. Overall despite the reported decrease since the 2015 assessment, the number of jobs within Wyre is expected to grow during the plan period.
- 1.1.7 Whilst the projections provide for economic growth over the plan period, the reports authors acknowledge that its adoption will mean that the pre-recession position of the economy will not be reached until 2030 - 22 years following the 2008 recession. A 22-year recovery does not in our Client's view represent an aspirational or positive basis against which to plan for economic and housing development. The Council should aim to close this gap sooner. A higher employment projection should therefore be pursued by the Council.
- 1.1.8 The Addendum II OAN report considers the implication of the employment projection and planned employment supply on housing need. A housing requirement of 415 dwellings is assessed, however this is evidenced to result in a loss of working age population. Our Client does not consider that this provides for a sustainable basis for the Council to plan against, and as such an increased rate of housing delivery is clearly necessary.
- 1.1.9 Our Client is further concerned by the assumptions made within the assessment in relation to the active workforce and double jobbing. Should these not occur, the plan is at significant risk from failing to provide sufficient housing to support its employment growth, increasing the prospect of the failure to achieve this, and/or resulting in changes to the demographic profile, with more fundamental implications for the long-term sustainability of the Borough. In view of this, our Client is supportive of 513 dwellings forming the OAN.

1.2 Should the OAN be higher to support job growth and the delivery of affordable housing?

- 1.2.1 As set out above our Client is concerned that the employment projections supporting the plan provide for a pessimistic picture of the future economy of Wyre, with a comparatively slow return to the size of the economy in the Borough to that experienced prior to the recession. Plan making by the authority should be used by the Council as an opportunity to encourage new investment and enhance the economy of the Borough. As such the Borough Council should plan for an elevated employment land and housing requirement.
- 1.2.2 The Council must ensure that the long-term sustainability of the demographic profile of the Borough is secured. As such the Council should not adopt a housing requirement which would lead to a reduction in the economically active workforce.
- 1.2.3 The assessed level of affordable housing need in Wyre is for 134 dwellings per year over the next 5 years and 189 dwellings thereafter. Assuming market led provision and applying Policy HP3 of the Local Plan, the Council could expect to deliver 123 affordable dwellings per year with the adoption of the proposed housing requirement. This is marginally below the affordable need of the next five years, with the gap widening thereafter.
- 1.2.4 Evidenced market signals illustrate a large increase in concealed households. Whilst increasing general supply may address this need in a limited way, the delivery of sufficient affordable housing would ensure that this is fully accounted for within the Local Plan. Our Client therefore considers that market signals evidence further illustrates the need to maximise affordable housing provision.
- 1.2.5 For these reasons our Client considers that the OAN represents 513 dwellings per year, an uplift of 34 dwellings per year of that identified within supporting evidence.

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

- 1.3.1 The Standardised Methodology for assessing housing need is subject to continuing public consultation by the Government and as a result does not form part of national planning policy. Limited weight should be attached to this approach to defining housing needs at this time, given the potential for this to be altered before forming part of any revised NPPF.

- 1.3.2 Should the Standardised Methodology as proposed be adopted by the Government within the Revised NPPF, it will form the basis against which local planning authorities will be required by national planning policy to derive their housing requirements. Whilst representing a refinement of policy in defining housing need, the delivery of the Standardised Methodology requirement is subject to local conditions and objectives. A Local Planning Authority may use an alternative approach to assessing housing need where this is justified. Therefore, whilst this approach establishes a minimum housing requirement for a local authority, it does not necessarily represent a maximum housing requirement.
- 1.3.3 Referring to the Governments spreadsheet of indicative housing requirements which supported the September 2017 consultation, the application of the Standardised Methodology in Wyre would result in the need for a housing requirement of 313 dwellings per year (98 dwellings per year below that proposed by the Council). For the reasons set out below, our Client does not believe that the Standardised Methodology is appropriate in the case of Wyre:
- The Wyre Local Plan is predicated on promoting jobs growth over the plan period. This is confirmed within the Plan vision and objectives. Evidence supporting the Local Plan illustrates that the adoption of a housing requirement of 415 dwellings per year would result in a decline in the working age population. As such it is clear that the adoption of 313 dwellings per year, would lead to a substantial loss of working age population, threatening the achievement of the aims of the Plan, and increasing the unsustainability of the Borough; and
 - The Affordable Housing Needs of the Borough are significant. The adoption of the Standardised Methodology would reduce the capacity of the local authority to address this source of housing need.

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?

- 2.1.1 Our Client considers that the Council should plan for full delivery of the OAN. Our Client questions the robustness of highways data which evidences the need to restrict housing delivery. Our Client considers there are flaws within the data which could mean that constraints are over emphasised. The adopted spatial strategy is entirely reliant on highways constraints data and has been submitted without critique of its robustness or accuracy.

- 2.1.2 Taking highways data at face value, the Council has relied on this in the selection of its spatial strategy choosing to distribute development across the borough in an effort to avoid over concentration of growth and pressure on the highway network. This has ignored the individual sustainability and accessibility merits of certain locations in regard to their proximity services and facilities, shops, sources and public transport which would reduce the reliance on the car, and the potential benefit their development might have on existing patterns of travel.
- 2.1.3 In our Client's view the spatial strategy adopted may in fact act to artificially constrain the amount of housing which is deliverable without adverse effect, given the reliance on travel which results. The orientation of development to towns in the Fylde Peninsula would represent both a sustainable and positive planning strategy in maximising housing delivery in the context of potential highway constraint.

4.2 Are the highway constraints overstated?

- 2.2.1 The presence of capacity constraints is not unusual or specific for Wyre compared to much of the country and would be considered by most Local Authorities in their Plan making. A key consideration is to consider highways as one part of a sustainable transport strategy.
- 2.2.2 Our Client prepared a critique of the highways evidence prepared by LCC (see Appendix 4). This assessment was submitted alongside our Client's representations to the submission version of the Local Plan. In summary this critique considers the highways evidence prepared by LCC to be flawed for the following reasons:
- Development should be focussed to sustainable locations, encouraging access by foot, resulting in lower trip rates;
 - Modelling should reflect main commuting patterns within and to areas adjoining the Borough which do not use the Strategic Road Network;
 - Existing data and traffic modelling used to inform the assessment by LCC are not comprehensive with some models described as rudimentary;
 - Evidence of road capacity limitations within some towns is not available, as such an examination of this data is not possible raising questions over transparency and the reliability of this evidence;
 - It is unclear whether all mitigation measures proposed have been taken into account within the modelling;

- The modelling process does not account for public transport to allow for modal shift and lower trip rates for sustainable sites located in close proximity to public transport and services and facilities; and
- The Desktop Assessment applied by LCC towards particular sites is not factually correct when considered to specific factors on the ground.

2.2.3 In response, our Client considers that LCC need to review this evidence.

2.2.4 Owing to the shortcomings identified above, our Client considers to a high degree of certainty that a higher housing requirement could be accommodated within the Borough without an adverse effect on the highways network.

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?

2.3.1 LCC will need to reassess the highways implications of accommodating varying amounts of housing within the Borough in response to the comments outlined above, before this figure is known. However, notwithstanding this, our Client believes that there are measures available to the Council to accommodate further housing within the Borough with resulting in severe congestion on the Borough's roads such as adjusting the spatial strategy to concentrate housing delivery at Wyre's most sustainable and accessible locations (such as Poulton-le-Fylde).

2.3.2 It is likely that the A585 corridor will be improved in the lifetime of the Plan and that improvement is likely to result in traffic transferring off local roads offering a wider improvement to highway operation. Alongside these strategic improvements there is reasonable expectation of other local highway improvements to facilitate development.

2.3.3 The highway improvements work alongside the Great North Rail improvements which will improve capacity, reliability and station improvements for journeys from Poulton to Preston and then onto Manchester.

2.3.4 It is unlikely that after these improvements the residual cumulative impacts from development to meet the OAN would result in a severe impact.

4.6 Would a different distribution of development avoid severe highways impacts and allow the LP to meet housing needs?

- 2.4.1 Our Client considers that the adoption of a dispersal strategy would increase reliance on modes of transport for people to access higher order services and concentrations of employment in locations which are likely to be at an increased distance. Whilst the spatial strategy attempts to address this with the distribution of employment along the same means, the local authority holds limited powers to ensure their delivery and secure local employment.
- 2.4.2 Instead the Council should refocus development towards the Fylde Peninsula Towns. This can be achieved through further allocations required to meet the OAN. The Fylde Peninsula is subject to the greatest concentrations of jobs, services and shops within the Borough. The Fylde Peninsula also features the highest concentration of public transport routes, providing a reliable and realistic alternative to the car. As part of a sustainable strategy, development should be located in areas that allow residents to access services, facilities and public transport on foot.
- 2.4.3 Commuting evidence illustrates that the Borough holds the strongest travel connections with Blackpool which adjoins the Fylde Peninsula. Public Transport connections best reflect these connections with two thirds of services orientated to link settlements in the Fylde Peninsula with Blackpool. These facts mean that developments in these parts of the Borough would not be as reliable on the car than other locations within the Borough and their highways impact not as great.
- 2.4.4 Assessed routes deemed to be at or over capacity within the LCC evidence does not consider the links between these settlements and Blackpool. As such development in locations well related to Blackpool and the Fylde Peninsula may not have the same impact on the strategic highway network as other locations within the Borough.