

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 4: Housing Land Supply****Issue 1: Components of Housing Supply***1.1 What is the up to date housing supply position (base date of 31 March 2018)*

1.1.1 The Matters, Issues, and Questions Paper prepared for the Examination, advises under Matter 4, that the Council have indicated that information outlining housing monitoring will be updated to reflect a base date of 31st March 2018. This information will be made available in advance of the hearing. At the time of writing, this evidence has not been made available and as a result we have not had the opportunity to review or comment on this updated position. Our Client therefore requests the opportunity to review and comment on the 31st March 2018 base date data should this be made available for the purposes of the Local Plan examination.

1.3 Are the components of supply clearly shown within the Local Plan?

1.2.1 There are three tables within the Local Plan which sets out how the housing requirements of the Local Plan are to be delivered. This is provided within the unnamed table on Page 33 of the Local Plan; the distribution of development set out within Policy SP1 of the Local Plan; and Policy SA1 of the Local Plan.

1.2.2 Whilst the information is available within the Local Plan in relation to supply and delivery, this is not readily available within a single part of the Local Plan. As such the user is required to refer to differing parts of this document, reducing the Plan's clarity and increasing its complexity. The affect is to reduce the accessibility and transparency of the document, and this may harm its effective implementation. Modifications are needed to ensure clarity.

1.2.3 Our Client considers that the inclusion of a Housing Trajectory within this document will help address this issue. The housing trajectory provides a single source of information which sets out how the Local Plan is to be delivered, including previous completions, committed supply and allocated sites.

1.4 Should there be a windfall allowance?

- 1.3.1 Paragraph 48 of the NPPF sets out that where justified by evidence, Council's may make an allowance for windfall sites within the five-year supply. The Council explain in Paragraph 7.21 of the Housing Background Document that no windfall allowance is applied within the Local Plan despite the Council's claim of previous evidence of windfall delivery. The Council acknowledge that windfall delivery recorded within evidence would not necessarily continue into this plan period, but ultimately resolve that no windfall allowance is included due to the fact that the accommodation of additional housing to those allocated within the plan would be contrary to highways constraints evidence.
- 1.3.2 Our Client believes that it is up to Council as to whether there are sufficient merits to introduce a windfall allowance or not. Provided that evidence sufficiently supports this component of supply and there is no double counting with sites already included within the supply, our Client believes that the inclusion of a Windfall allowance would be acceptable in principle.
- 1.3.3 Our Client is however concerned by indications raised by the Council that it would not permit any additional development within the plan period, other than that allocated or identified through the Local Plan. Our Client does not believe that highways constraints are sufficient to demonstrate the need for a moratorium on development in the Borough. The approach is inconsistent with the presumption in favour sustainable development outlined by Paragraph 14 of the NPPF and creates for a highly inflexible and anti-development development plan. The suggested highway constraints have never been subject to consultation and no alternative positions have been considered. It is questionable whether this evidence takes into account capacity released by Highways England improvements to the strategic road network.

Issue 2: The Housing Trajectory and Housing Implementation Strategy

2.1 Does the Housing Background Paper satisfy the requirement for a housing trajectory and HIS as required by Paragraph 47 of the NPPF?

- 2.1.1 Whilst the publication of this evidence is welcomed by our Client (further to our request in our representations to the submission version of the Local Plan), it is considered that this information should be included as an Appendix to the Local Plan, to confirm the deliverability of the plan, and to ensure that the Council have something to monitor the successful

implementation of this once adopted. The information included within the Housing Background Paper should therefore be transferred to the Local Plan by way of a Main Modification.

2.2 Is the approach to making up shortfall in delivery over the Local Plan Period justified (the Liverpool Approach)?

- 2.2.1 Our Client objects to the adoption of the 'Liverpool' approach for meeting plan shortfall. Our Client does not accept that the absence of a Local Plan and prevailing market conditions has substantially influenced the Council's failure to meet its housing need in full. The Green Belt within Wyre covers just 2.6% of the Local Authority, and as such the adoption of a new Local Plan is not fundamental to unlocking large areas for development. Monitoring of completions since the start of the plan period illustrate an improving picture in completions since those experienced at the height of the economic recession. The bottom line is that the Council has consistently failed to release enough land for development.
- 2.2.2 As set out in our Matter 3 Hearing Statement our Client does not accept that Highways Constraints are as significant as evidenced by LCC. Our Client considers that the pursuit of an alternative spatial strategy, similar to that of the Fylde Peninsula Option identified at the Issues and Options Stage, will help achieve the heightened delivery required over the plan period to secure the delivery of the full housing needs of the Borough without resulting in severe impacts on the Highway Network.
- 2.2.3 For the reasons set out above, our Client does not believe that there is a sufficient justification for the Council to adopt the Liverpool approach for meeting unmet housing need. The approach is neither justified nor positively prepared.
- 2.2.4 In response, consistent with Paragraph 035 reference ID:3-035-20140306 of PPG and the priority of the NPPF to boost housing land supply, our Client considers that the Sedgefield approach should be applied.
- 2.2.5 The implication of the above, increases the five-year requirement of the Wyre Local Plan by 820 dwellings (based on the proposed housing requirement of 411 dwellings per year).

Issue 3: Five Year Housing Land Supply

3.1 Should a 5% or 20% buffer be used to calculate the housing land supply position?

- 3.1.1 Table 12 of the Housing Background Paper January 2018 Update provides a record of the net completions achieved within the Borough since 2000/2001. The table suggests that over this period the Council has achieved completions which are significantly in excess of its adopted housing requirement, with delivery falling below this level in just 4 years, including those years which were most effected by the economic recession. However, this record of delivery is based against a housing requirement which is based on the now revoked North West RSS, is substantially out-of-date, and has not been prepared in accordance with the requirements of the NPPF. The RSS figure does not therefore provide an appropriate basis against which to examine the performance of the delivery of housing in the Borough as it represents a different strategy.
- 3.1.2 Table 12 also illustrates delivery of housing against the proposed OAN and housing requirement of the emerging Local Plan. Measured against both figures it is clear that the amount of recorded completions has been insufficient with an accumulated shortfall of between 820 and 1,228 dwellings identified. Against the plan requirement, a shortfall is recorded in 5 out of 6 of the monitoring years, whereas the identified OAN has not been achieved in any year since the start of the plan period. This record illustrates that the Council holds a persistent record of under delivery and as such, applying Paragraph 47 of the NPPF, a 20% buffer taken from the end of the plan period should be applied by the Council to its five-year supply calculation.
- 3.1.3 As set out above, in relation to the discussion on Sedgefield/Liverpool, our Client does not accept that constraints raised by the Council are sufficient reason for the application of a 5% buffer due to challenges of deliverability.
- 3.1.4 Table 8 of the Housing Land Monitoring Report (March 2017) illustrates that the amount of new planning permissions being granted by the Council has substantially increased over the last 3 years, with 780 dwellings granted in 2014/15, 919 dwellings granted in 2015/16 and 1378 dwellings granted in 2016/17. In 2016/17 sites with a sufficient capacity for three times the proposed housing requirement were granted. This is also over 1,000 dwellings higher than level of supply granted in 2013/14.

- 3.1.5 Furthermore Appendix 3 of the Housing Background Monitor illustrates that there is now double the consented amount of land within the Borough than that which has typically been experienced at any stage between 2004/05 and 2014/15.
- 3.1.6 Collectively this information shows that there is a capacity within the market to respond to supply needs of the Council. The information outlined above is clearly contrary to the statement provided by the Council in Paragraph 6.11 of the Housing Background Paper January 2018 Update. As a result, it is considered that the achievement of a 20% buffer to the housing requirement is deliverable.

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

- 3.2.1 In broad terms, our Client agrees with the trajectory of commitments and allocations over the plan period as set out within the Appendices of the Housing Background Paper.
- 3.2.2 Several sites are noted to deliver throughout the plan period. This includes strategic sites at Norcross Lane (SA1/11), Forton (SA3/4), Great Eccleston (SA3/3), Inskip (SA1/13), Garstang Road (SA1/6) and Lambs Road (SA1/2), which collectively deliver 1,979 dwellings (20% of the total supply).
- 3.2.3 The protracted delivery of these sites means that they are more susceptible to changes in the market which might occur during the plan period. As such delivery rates of these sites may increase or slow dependent on prevailing market conditions which might be beyond the control of the Council. The Council can plan positively for this by planning a buffer to the housing land supply to ensure a greater degree of certainty that the development requirements of the Local Plan will be challenged.
- 3.2.4 At present the Wyre Local Plan provides a contingency of just 395 dwellings (4.8%) against the proposed housing requirement – however notably provides for an under supply against the assessed objectively assessed need of 965 dwellings (90% of this assessed housing need). Setting aside the evident under provision made by the Local Plan in the context of the assessed housing need, our Client is concerned that this buffer in supply is too limited in order to secure the deliverability of the Plan. The Plan makes no allowance for the non-delivery of large sites, as such there is little to prevent the failure of the plan should several allocations or commitments not come forward as or when envisaged. Our Client considers that a 10% buffer at least should be planned for in order to better secure the deliverability of the Plan. Further sites should be identified to provide for this buffer (including omission sites).

3.3 Are lead in times and build out rates within the Housing Background Paper Realistic?

- 3.3.1 Table 14 of the Housing Background Paper sets out the Council's assumed lead-in times and build out rates where these have not been provided by the developer. The Table is based on planning judgement but is considered by the Council to align to actual experience.
- 3.3.2 Whilst our Client does not object to revising lead-in times and build rates in accordance with site specific information, there is an absence of information provided within supporting tables in Appendix 2. As such it is unclear where the Council has applied assumptions and where the Council has applied information supplied by developers.
- 3.3.3 Where information is provided by developers, the Council should not accept this at face value, but rather consider alongside this information factors such as local market area as well as site specific issues which may need to be overcome ahead of delivery (i.e. infrastructure provision or phasing). In promoting site interests, it is not always the case that information provided is realistic, as the aim is to demonstrate the deliverability and value of the Site to the Council.
- 3.3.4 Our Client is concerned about the simplicity of the Council's assumptions in relation to lead-in rates, especially in the context of larger development sites. Our Client considers that there is need for the Council to differentiate between scales of development within its lead-in assumptions given that larger sites in general experience increased complexity due to issues such as infrastructure, landownership and legal requirements. Our Client also notes that the Council have not expressed what the lead-in time is for sites which do not benefit from planning consent.
- 3.3.5 In the table below, we set out the lead-in times, which we considered are realistic. This is based on previous experience in dealing with planning applications both locally and across the wider North West. The lead-in times set out within this table closely reflect those which are implemented by Cheshire East, Warrington and Wigan Councils. As such these are considered to be a sound guide for the Council to plan against.

Table 1: Modified Lead-in Times

	1-49 dwellings	50-149 dwellings	150-499 dwellings	500+ dwellings
Full Planning/Reserved Matters	6 months	9 months	12 months	12 months
Site awaiting s.106 (Full planning permission)	9 months	12 months	18 months	N/A
Outline Planning Permission	12 months	18 months	24 months	24 months
Sites awaiting S.106 (outline planning permission)	18 months	24 months	30 months	36 months
Pre-submission	24 months	36 months	42 months	48 months

3.3.5 In relation to build rates, it is unclear on what basis the assumed delivery for sites of 100 dwellings or more has been reached by the Council. No justification is provided by the Council for the increased build rate assumed. It is not typical for a site of less than 250 dwellings to be developed by more than a single developer and this will be subject to site by site conditions and how the site is being promoted for the landowner.

3.3.6 For sites of more than 250 dwellings, it should not be assumed by the Council that with an additional outlet, delivery would increase proportionately. This is because market competition can have the effect of dampening rates of delivery with developments often self-financed against the rate of sales. As such where the rate of delivery is typically 30 dwellings per year, the Council should not expect this to increase to 60 dwellings per year where there is an additional developer. A cautious but realistic approach would be to assume a delivery rate of 50 dwellings per year.

3.4 Is the approach to lapse rates realistic (10% for small sites, no lapse rate for larger sites)?

3.4.1 Table 15 and Appendix 3 of the Housing Background Paper January 2018 update provide an account of lapsed planning permissions within Wyre since 2004/05. The evidence illustrates that over this period an average of 30 dwellings per year are lost from the supply on account of lapsed planning permissions. Footnotes to this information illustrates that generally the

lapses in planning permission are from small sites, though occasionally this includes “major” developments.

- 3.4.2 On account of this information our Client considered that there is not necessarily a requirement of a lapse rate for large planning consents to be included within the Local Plan. However, looking over the remaining 12 years of the plan period the Council cannot assume that all sites permitted or allocated will come forward as envisaged. Evidenced lapsed planning consents at large sites recorded by the Council, illustrate that Wyre is not immune to this. As such there is need for the Council to ensure that there is flexibility within its housing land supply in contrast to the housing requirement. This provides further need for the Council to ensure that there is a sufficient buffer to the housing requirement. A 10% buffer to the requirement should be planned for.

3.5 Will there be a five-year supply of deliverable housing sites on adoption of the Local Plan?

- 3.5.1 Our Client does not consider that there will be a 5-year supply on adoption of the Local Plan. In response there is a need for the Council to identify further sites which are available, deliverable and achievable within the next five years. Such options available to the Council include our Clients interests Land South of Blackpool Road, Poulton-le-Fylde (allocation reference SA1/8) and Land at Oldfield Carr Lane, Poulton-le-Fylde (an omission site).
- 3.5.2 In arriving at this conclusion, we rely on conclusions made in relation to shortfall and buffer as set out in response to questions 2.2 and 3.1 of this Matter Statement, applying the Sedgefield approach in response to meeting acknowledged shortfall in housing (within 5 years) and applying a 20% buffer from the end of the plan period (for evidence of persistent under delivery) to the residual five year requirement.
- 3.5.3 In Table 2 (overleaf) we set out the five-year housing land supply position of the Borough with reference to the proposed housing requirement, assessed OAN and recommended OAN as set out in our Matter 3 Hearing Statement (i.e. Barton Willmore Scenarios as expressed in Table 2). As concluded above it is clear that the Council is unable to demonstrate a five-year land supply and as such further sites are needed in order for the Council to secure a five-year supply upon adoption of the Local Plan.

Table 2: Wyre Five Year Land Supply Position

	WBC Position	Barton Willmore Scenarios		
		WBC Proposed Housing Requirement	WBC OAN	BW OAN
Base 5-year requirement	2055	2055	2395	2565
Residual need (shortfall)	295 (Liverpool)	820 (Sedgefield)	1228 (Sedgefield)	1432 (Sedgefield)
Buffer	118 (5%)	575 (20%)	725 (20%)	799 (20%)
Residual five year requirement	2468 (494 dpa)	3450 (690 dpa)	4348 (870 dpa)	4796 (959 dpa)
Deliverable supply	3172	3172	3172	3172
Supply (Years)	6.4	4.6	3.6	3.3