This matter considers how the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will be able to maintain a five year housing land supply.

The Council has provided information with its hearing statement to reflect a base date of 31 March 2018.

Delivery from individual sites will be considered during Week 2 of the hearings.

Proposed Main Modifications MM/001, MM/002, MM/021 to MM/023 and MM/090 are relevant to this session

Issues

1. Components of Housing Supply

   1.1 **What is the up to date housing supply position (base date of 31 March 2018)?**
   The Council indicates that up to date figures show that 8,404 dwellings can be delivered in the Plan period. Two allocations are to be deleted as they were under construction at 31 March 2018 and are therefore are included as commitments (SA1/4 and SA1/7).
   **Particular points to be explored:**
   Should the Council ensure that the likely supply is above the Local Plan housing requirement (or OAN) to ensure that there is flexibility built in?
   If so what scale of flexibility should be applied?

   1.2 **What are the components of the housing supply that will meet the housing requirement?**
   MM/022 includes a table showing the components of housing supply.

   1.3 **Are the components of supply clearly shown within the LP?**
   See MM/022.

   1.4 **Should there be a windfall allowance?**
   **Particular points to be explored:**
   Do past completion figures and planning permissions provide the evidence for a windfall allowance?
   The scope for windfall development on sites below the 25 dwelling allocation threshold.
   Are highway constraints a sufficient justification for not including a windfall
allowance?
The acknowledgement that 0.9 ha of employment land will be lost to windfalls per annum.

2. The Housing Trajectory and Housing Implementation Strategy (HIS)

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

**Particular points to be explored:**
- Does MM/090 satisfy the requirements for a housing trajectory and HIS?
- Do MM/090 and the Housing Background Paper constitute a HIS particularly in respect of actions to be taken to remedy shortfalls in provision and monitoring arrangements?
- Should the Housing Background Paper (or a summary of it) be included within the LP to form a HIS?

2.2. Is the approach to making up any shortfall in delivery over the LP period justified (the Liverpool approach)?

The Council’s figures (Appendix B to its hearing statement) show that there would be a 5 year supply using the Sedgefield method (assuming a 5% buffer is applied and based on a housing requirement below the OAN). The Council point out that there are no delivery ceilings or phasing restrictions within the Local Plan.

**Particular points to be explored:**
- Would using the Sedgefield method lead to a risk that the Local Plan would fail?
- The extent of delivery from large sites which may take longer to get out of the ground.
- Would use of the Liverpool approach achieve the objective of boosting significantly the supply of housing and meeting the needs of those who require a new home now?

3. Five Year Housing Land Supply

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

**Particular points to be explored:**
- What period should be used to measure whether there has been persistent under-delivery?
- As the Local Plan period commenced in 2011 should the housing requirement (411 dpa) from that date be used as the measure for delivery between 2011-18?
- Assuming 411 dpa is used delivery was below that figure for every year between 2011 and 2018 apart from 2016/17.
- A comparison with Fylde where a 20% buffer was applied.
- Do any recent appeal decisions assist in relation to the buffer issue?
3.2 Generally, are the assumptions about the delivery from commitments and allocations realistic?

**Particular points to be explored:**
- Are the trajectories shown in Appendix A of the Council’s statement realistic?
- Does the document ‘Start to Finish’ (Lichfields) assist in assessing the veracity of the evidence on rates of delivery?
- Is delivery from smaller settlements of 60 dpa realistic?
- Is delivery of 40 dpa from a single developer realistic?

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

**Particular points to be explored:**
- Are there inconsistencies in the information about build out rates in the Housing Background Paper and how these have been applied? (Table 14 and para 7.27 refer)
- Could some sites that show some delivery beyond 2031 be delivered completely within the Plan period applying standard build out rates?
- Is there a case for a more detailed analysis of lead in times and build out rates (see Lichfields and Barton Wilmore analysis)?

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

**Particular points to be explored:**
- Should a lapse rate be applied to larger sites or should delivery be considered on an individual site basis?
- If no lapse rate is applied for large sites should more flexibility be built into the supply to allow for some sites not coming forward or being delayed?

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

**Particular points to be explored:**
- If the Sedgefield approach and a 20% buffer are applied what measures can be included in the Local Plan to ensure a 5 year supply on adoption of the LP (current calculations show that only 4.6 years supply would be achieved)?

4. The wording of housing supply policies

4.1 Is Policy HP1 clear to the decision maker? (the Council propose modifications in response to the Inspector’s preliminary questions)

**Particular points to be explored:**
MM/002 and MM/023 propose that the housing requirement be expressed as a minimum.
Is Section 2 of Policy HP1 justified and necessary?

Main Evidence Base
ED010 – Housing Background Paper
EL1.001b - Council response to Inspector’s Preliminary Questions
Schedule of Main Modifications

Participants
Wyre Council
JWPC re Ireland & Platt 1026  EL2.002  Stuart Booth
Thornton Action Group 0072  Howard Phillips + Philip Jenkins
Peter Tarrant 0064
Home Builders Federation 0297  EL2.007  Joanne Harding
Ashley Cutts 0127  EL2.008
Emery Planning re Wainhomes NW 0794  EL2.022d  Stephen Harris
Fylde Council 0289  EL2.024  Julie Glaister + Eddie Graves
The Strategic Land Group 0963  Paul Smith
Lichfields re Taylor Wimpey 0363  EL2.028d  Brian O’Connor
De Pol Assoc re Metacre 0962  Alexis De Pol
Hollins Strategic Land 0358  EL2.032  Matthew Symons
Barton Willmore re Story Homes 0360  EL2.035d  Dan Mitchell
Wyre Labour Group of Councillors 0051  Cllr Rob Fail

Statements
Wyre Council
Home Builders Federation
Save Our Scorton Residents Association
Emery Planning
Fylde Council
Blackpool Council
Lichfields
Hollins Strategic Land
Barton Willmore