

WYRE LOCAL PLAN PARTIAL REVIEW (2011-2031) EXAMINATION

Agenda

Session 2 – Tuesday 27 September 2022 (to follow Session 1)

Matter 2

Housing Need, Requirement and Supply

Participants

Wyre Council - Fiona Riley, Steve Smith, Len Harris, and Philip Robson (Barrister)
Home Builders Federation - Joanne Harding,
Wainhomes - Stephen Harris, Emery Planning
Gladman Developments Ltd - Michael Dinn
Fylde Council - Mark Evans and Eddie Graves

This matter explores whether the housing requirement proposed in the Wyre Local Plan Partial Review (WLPPR) is appropriate to meet the needs of the area and whether the housing supply position is up to date.

Policies to be covered by Matter 2: Policies SP1 and HP1

Main Evidence Base

SDPR01 – Publication draft Schedule of Revisions to the Wyre Local Plan (2011-2031) [November 2021]
EDPR02 – Implementation of Policy LPR1 Background Paper [November 2021]
EDPR03 – Housing Implementation Strategy Partial Review [November 2021]
EDPR04 – Authorities Monitoring Report
EL1.006 – Housing Implementation Strategy [2022]

Statements

Wyre Borough Council [EL3.002]
Gladman Developments Ltd [EL2.001b]
Home Builders Federation [EL2.002c]
Wainhomes [EL2.003]
Lichfields [EL2.004]
CPRE [EL2.005]
Fylde Council [EL2.006]

Potential Main Modifications (MMs)

Draft Schedule of MMs [EL3.006]

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Background

The adopted Wyre Local Plan (WLP) did not meet the full Objectively Assessed Housing Needs (OAHN), setting a requirement of 9,200 dwellings or 460 dwellings per annum (dpa) against an OAHN of 9,580 dwellings, a shortfall of 380 dwellings. The main justification for a lower requirement was highways capacity. However, the WLP included Policy LPR1 which required that the Council bring forward a partial review of the WLP with the objective of meeting the full OAHN. In the meantime the Fylde Local Plan Partial Review (FLPPR) has been adopted and includes provisions for meeting the 380 dwelling unmet need¹. The Council has progressed and submitted this partial review in accordance with the timetable set by Policy LPR1.

Issue 1: Housing Need and Requirement

Notwithstanding the objective of Policy LPR1 in relation to OAHN, the WLPPR proposes a significantly lower housing requirement, based on a local housing need assessment, using the standard method set out in national guidance. As a result the WLPPR contains a housing requirement of 7,232 net additional dwellings - 296 dpa for the period 2019/20 to 2030/31, 460 dpa for the period between 2011/12 and 2018/19. It is noted that the FLPPR adopted a similar approach.

The National Planning Policy Framework (the Framework) and Planning Practice Guidance (PPG) support a significant boost in housing supply and indicate that alternative approaches to using the standard method may be justified. The documents refer to the circumstances where a higher figure might be appropriate. The non-exhaustive circumstances referred to in the PPG include growth strategies, strategic infrastructure, and unmet need from neighbouring authorities. Reference is also made to previous housing delivery². The PPG also notes that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes³.

1. *In principle and taking into account the contents of the Wyre Local Plan (WLP), is it justified for the WLPPR to use the standard method as a basis for the housing requirement⁴ rather than undertaking a new housing needs assessment?*

1a. *In particular can the approach be justified taking into account the contents of paragraph 062 of the PPG?⁵*

2. *If the use of the standard method is justified, for what period should it apply?*

¹ <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/adopted-fylde-local-plan-to-2032-incorporating-partial-review/>

² Paragraph: 010 Reference ID: 2a-010-20201216

³ Paragraph: 024 Reference ID: 2a-024-20190220

⁴ The WLPPR uses the standard method for the period 2019/20 to 2030/31

⁵ Reference ID 61-20190315

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3. *Taking into account that the standard method should be taken as the minimum, do the circumstances exist to support an uplift on the housing figure derived from the standard method?*
4. *For example, should the housing requirement be increased to take into account economic growth aspirations, strategic infrastructure improvements, choice, and competition in the housing market, and/or affordable housing need?*
5. *Do recent levels of delivery in the Council area justify a higher housing requirement⁶?*
6. *How should the 380 dwellings provided through the Fylde LP Partial Review to meet Wyre's needs be accounted for?*
In considering this question, the Inspector notes the points made by Fylde Borough Council (pages 3-4 of EL2.006) which will be discussed.

Issue 2: Implications of the housing requirement

7. *Have the implications of using the reduced housing requirement for the Plan strategy as a whole been taken into account?*
8. *In particular*
 - (a) *Will the Plan as reviewed deliver the affordable homes needed?*
 - (b) *Will the reduced figure constrain jobs and economic growth, including in connection with initiatives such as the Hillhouse Enterprise Zone?*
9. *Would an alternative housing requirement figure, e.g. 460 or 479 dpa, be justified, based on up to date evidence?⁷*
10. *What implications would there be for the WLP and WLPPR, if an alternative housing requirement figure was justified?*

The WLP includes a requirement to deliver a minimum of 43 hectares of employment land between 2011-31 reflecting the Objectively Assessed Employment Need. The WLPPR does not propose any changes to the employment land requirement.

11. *Should the employment land requirement be amended taking into account the reduced housing requirement?*
12. *Are there any significant implications for the soundness of the Plan, if the employment land requirement is not altered?*

⁶ EL1.006 shows delivery at an average of around 518 dpa for the five year period of 2017/18 to 2021/22 and some 385 dpa from the start of the Plan period (2011/12)

⁷ It is noted that housing supply for the overall plan period would exceed the housing requirements of 460 dpa (9200 dwellings – WLP) or 479 dpa (9580 dwellings – OAN based on 2017 evidence)

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Issue 3: Housing Supply

EDPR02-04 assessed allocations in the WLP and other sources of supply and indicate that there was a supply of 9,423 dwellings against the WLPPR requirement of 7,232 dwellings, at 31 March 2021.

The Council has provided an update on housing land supply to reflect the position at 31 March 2022 (EL1.006 and EL3.002). This shows an overall supply for the Plan period of 9,585 dwellings. In terms of five year supply calculations, the Council's position is that against the requirements of the WLP, there are 6.74 years supply and against the WLPPR some 11.17 years supply. The Draft Schedule of MMs reflects the up-to-date housing land supply position for the Plan period (see in particular E/MM/14, E/MM/16, and E/MM/35). The schedule also proposes removing references to a Housing Implementation Strategy as such a document is no longer referred to in the Framework (see E/MM/18, E/MM/19, and E/MM/33).

13. Taking into account the Draft MMs referred to above, will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2022)?

14. Is there any evidence that allocations in the WLP overall are not coming forward as projected?

The Council's statement indicates that there were only two allocations that which did not benefit from planning permission or a pending application at the base date of 31 March 2022 (SA3/1 and SA1/3). Since then an application has been submitted on SA1/3.

14a. Is the stated position on allocations consistent with the information provided in EL1.006 (Appendices 5 and 10 - more than 2 allocations appear to be without planning permission or applications pending)?

15. Does the evidence base support the Council's housing supply position, including the existence of a 5 year housing supply?

As noted above, the Housing Implementation Strategy [2022] (EL1.006) indicates that against the requirements of both the WLP and WLPPR, housing land supply would be significantly above five years.

15a. What would be the position in terms of 5 year housing land supply if the housing requirement was based on an OAHN of 479 dpa and the Sedgfield approach was applied to any shortfall?

16. On the basis that the housing requirement remains as set out in the WLPPR, is there likely to be insufficient or too much flexibility in the supply?