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Dear Tony Blackburn,

**WYRE LOCAL PLAN PARTIAL REVIEW EXAMINATION: INSPECTORS MATTERS,
ISSUES AND QUESTIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wyre Local Plan Partial Review Inspector's Matters, Issues and Questions.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Council has undertaken a Partial Review, with policies SP1: Development Strategy, SP4: Countryside Areas, HP1: Housing Requirement and Supply, HP3: Affordable Housing, HP4: Exception Sites and EP5: Main Town Centre Uses being reviewed.
4. The HBF would like to comment on the following questions raised by the Inspector as part of their Matters, Issues and Questions.

Yours sincerely,



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Matter 1: Introduction to the Hearings, Legal Compliance, Procedural Requirements, and the Duty to Cooperate

Policies to be covered by Matter 1: Policies SP1 and HP1 (in respect of the DtC and SA)

Main Evidence Base

*SDPR01 – Publication draft Schedule of Revisions to the Wyre Local Plan (2011-2031)
[November 2021]*

SDPR03 – Sustainability Appraisal [November 2021]

SDPR07a, 7b and 7c – Statements of Common Ground and Duty to Cooperate Statements and annexes [April 2022]

SDPR08a, 8b and 8c – Statement of Consultation and annexes [April 2022]

SDPR10 – Statement of Community involvement [updated March 2022]

Issue 1: Consultation and community engagement

The Planning Act requires that the local planning authority (LPA) prepares a Statement of Community Involvement (SCI) and complies with it. The Council recently updated its SCI following a consultation process in April/May 2021 (SDPR10).

- 1. Is there any evidence that the Council has not complied with the SCI, not met the minimum requirements for consultation or that consultation and publicity has otherwise been inadequate at various stages of the LP Partial Review process?*

Issue 2: The Duty to Cooperate

The Planning Act requires that LPAs engage constructively, actively, and on an on-going basis with one another in order to maximise the effectiveness of plan preparation.

SDPR07a, 7b and 7c have been provided by the Council to support its position that the DtC has been complied with.

- 2. Is there any evidence that the Council has not engaged constructively, actively, and on an on-going basis on strategic matters with other LPAs and other relevant bodies?*

Following examination and adoption in December 2021, the Partial Review of the Fylde Local Plan met Wyre's identified unmet housing need of 380 dwellings. Fylde now considers that, with a reduced housing requirement, it no longer needs to assist in meeting unmet needs. It is acknowledged by Wyre that, subject to the reduced housing requirement being accepted, it can meet all of its housing needs.

- 3. Does the LP (and/or the supporting information such as the DtC statement) need to be modified to reflect the position that Wyre can now meet all of its housing need, notwithstanding the provisions of the Partial Review of Fylde Local Plan?*

- 1. The HBF does not consider that the reduced housing requirement is sound and as such considers that there is likely to still be unmet need to be addressed by Fylde. However, if the Inspectors considers that the reduced housing requirement is*

appropriate then it is likely that the DtC Statement will need to be modified to reflect that position.

Issue 3: The Sustainability Appraisal and its consideration of reasonable alternatives

The Council's position is that the SA has considered the need for an assessment of reasonable alternatives and concluded there are no reasonable alternative options to the local housing need of 296 dwellings per annum (dpa). This is on the basis that there are no exceptional circumstances to justify an alternative approach over the standard method.

- 3. Does the SA meet statutory and legal requirements in relation to the assessment of reasonable alternatives? In particular should the SA have assessed, as reasonable alternatives, housing requirements in excess of the local housing need figure?*

Matter 2: Housing Need, Requirement and Supply

This matter explores whether the housing requirement proposed in the 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

Issue 1: Housing Need and Requirement

As indicated above, the WLPPR proposes that the housing requirement should be based on the standard method. 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 Fylde Local Plan Partial Review adopted a similar approach.

That said, 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 delivery¹. 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 homes².

1. *In principle and taking into account the contents of the WLP, is it justified for the WLPPR to use the standard method as a basis for the housing requirement³ rather than undertaking a new housing needs assessment?*

1. The HBF generally supports the Council in using the standard method as the starting point to assess the housing need for the area. However, the HBF considers that the housing need is likely to be higher than the housing requirement currently identified.

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

2. The HBF considers that it is appropriate for the standard method to apply for the plan period, this is considered to be in line with the PPG⁴.

¹ Paragraph: 010 Reference ID: 2a-010-20201216

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

³ The WLPPR uses the standard method for the period 2019/20 to 2030/31

⁴ PPG ID: 2a-012-20190220

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. The HBF considers that the circumstances do exist to support an uplift on the housing figure derived from the standard method. The proposed housing requirement is a significant decrease from the housing requirement in the current Local Plan of 460dpa. It is also significantly below the 433dpa that have been provided on average over the period 2016/17 to 2020/21. The HBF considers that the housing requirement should be increased to better reflect this evidence.

Housing Completions (taken from DLUHC Table 122: Housing Supply, net additional dwellings by LA ⁵)						
	2016/17	2017/18	2018/19	2019/20	2020/21	Average
Wyre	462	370	396	361	576	433

5. The HBF also notes that the adopted Local Plan identified an annual affordable housing need of 134dpa in the first five years up to 2022 and rising to 189dpa thereafter. The Council does not appear to have updated the evidence in relation to the affordable housing need or proposed to amend this identified need within the Local Plan. This identified affordable housing need would be a significant proportion of the proposed housing requirement. The HBF considers that the housing requirement should be increased to allow for this affordable housing need to be met.
6. It is noted that the Council do not propose to amend the employment land requirement, the HBF is concerned that this reduction in the housing requirement will lead to an imbalance between economic development and residential development. The NPPF⁶ is clear that planning policies should seek to address potential barriers to investment such as inadequate housing provision. The HBF considers that the housing requirement should be increased to allow for an appropriate balance between employment and housing, as this will help to create a more sustainable area.
7. The HBF does not consider that the proposed change to the housing requirement is sound, as it is not positively prepared, justified or consistent with national policy.
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?***
8. The HBF considers that the housing requirement should be increased to take into account economic development and growth as set out in the Local Plan, to create choice and competition in the housing market and to meet the demand as shown by the high levels of delivery over the previous five years, to meet affordable housing need as shown in the Local Plan evidence. These considerations are in line with those set out in the PPG⁷ as considerations in relation to when it might be appropriate to plan for a higher housing need figure than the standard method indicates.

⁵ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

⁶ Paragraph 82 NPPF 2021

⁷ PPG ID: 2a-010-20201216

5. ***Do recent levels of delivery in the Council area justify a higher housing requirement⁸?***
9. The HBF considers recent levels of delivery in the Council area justify a higher housing requirement, particularly when considered alongside other factors highlighted above.
6. ***How should the 380 dwellings provided through the Fylde LP Partial Review to meet Wyre's needs be accounted for?***
10. The homes provided through the Fylde LP Partial Review should be considered as part of the housing land supply considerations. They should not be considered as part of the housing need calculation or housing requirement.

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?***
11. The HBF is concerned that the implications of a reduced housing requirement have not been fully taken into account, and could lead to a reduction in the delivery of affordable homes and an imbalance in employment development, and could reduce the sustainability of the area.
8. ***In particular***
 - (a) ***Will the Plan as reviewed deliver the affordable homes needed?***
 12. The HBF is concerned that the plan as reviewed will not 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?***
 13. The HBF is concerned that the reduced figure could constrain jobs and economic growth.
9. ***Would an alternative housing requirement figure, e.g. 479 dpa, be justified, based on up to date evidence?***
14. The HBF considers that an alternative housing requirement figure could be justified based on up to date evidence, including the affordable housing requirement, the provision of employment and the previous housing delivery.
10. ***What implications would there be for the WLP and WLPPR, if an alternative housing requirement figure was justified?***
15. The HBF considers that increasing the housing requirement, could have the potential to increase the provision of affordable homes, and help to support investment and employment opportunities.

⁸ EDPR03 shows delivery at an average of around 478 dpa for the five year period of 2016/17 to 2020/21

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?

16. The HBF does not consider that the employment land requirement should be amended to take 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?

17. The HBF is concerned that the imbalance between the employment land requirement and the housing requirement could potentially create a barrier to investment and employment and development, or could reduce the sustainability of the area.

Issue 3: Housing Supply

EDPR02-04 assess allocations in the WLP and other sources of supply and indicate that there is a supply of 9,423 dwellings against the WLPPR requirement of 7,232 dwellings. The documents indicate that only two allocations (SA1/3 and SA3/1) do not have the benefit of planning permission or a pending application.

The Council has indicated that it will provide an update on housing land supply to reflect the position at 31 March 2022, in advance of the statement deadline.

13. Will the up-to-date housing supply position be clearly shown in the Plan (base date of 31 March 2022)?

18. The HBF considers that this is a question for the Council. However, the HBF considers that it would be beneficial for the up to date housing supply position to be shown in the Plan.

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

19. The HBF does not wish to comment on any of the individual allocations, however, the Council should continue to monitor the allocations to ensure that they are coming forward and to address any issues with the developer or landowner where the sites are not coming forward.

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

20. The HBF does not wish to discuss individual housing sites, however, the HBF would expect the Council to ensure that the housing supply position was sufficient to ensure the existence of a five-year housing supply.

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?

21. The Council propose to include a table which sets out the housing land supply at 31st March 2021. It suggests that the housing land supply for the plan period is 9,423 dwellings, this is made up of completions (3,490), large sites with planning permission (762), small sites with planning permission (including a 10% discount) (363), allocated sites with planning permission (2,573), allocated sites without planning permission (1,885) and a windfall allowance (350). The total housing requirement based on the proposed amended housing figure is 7,232 net dwellings. Therefore, the supply is approximately 130% of the requirement. The HBF considers that it is appropriate for the Council to have a level of flexibility in the supply, this will allow for a range and choice in the market, and it also allows for sites that do not come forward as envisaged this could be at lower densities or over a longer period of time.

Matter 3 – Affordable Housing

The matter considers whether the changes to Policies HP3 and HP4 and the reasoned justification relating to First Homes are consistent with national policy.

Policies to be covered by Matter 3: Policies HP3 and HP4

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 – Appendix 5 [November 2021]

1) *Are Policies HP3 and HP4 (as amended) positively prepared and consistent with national policy?*

1. The HBF considers that the reference to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate.

2) *Is there a need for further explanation within Policies HP3 and HP4 and/or the reasoned justification to indicate how the revised policies will be applied, taking into account the contents of PPG⁹?*

2. The HBF considers it would be beneficial for the justification text to provide more details as to how the policy will be applied. The HBF considers that it would be useful for the justification to set out how the 10% affordable home ownership requirement will be met, for example in areas where the affordable housing proportion is 10% the HBF seeks assurances that the Council are satisfied that this will all be provided through affordable home ownership products. The HBF also considers that it would be beneficial for the Council to be specific in the justification text that the First Homes requirement as set out in the PPG is for 25% of the affordable housing to be First Homes, and for the Council to confirm that they will only be seeking the required minimum discount (30%) and that they will not be changing the price cap (£250,000), and that more detail can be found in the PPG.

⁹ <https://www.gov.uk/guidance/first-homes>

Matter 5 – Other policies

Revisions are also proposed to Policies SP4 and EP5 and the explanation to Policies SP6 and CDMP3 to reflect changes to national policy. Representations also suggest that other policies of the Plan should be updated to reflect recent changes to Government policy e.g. climate change and biodiversity net gain.

Policies to be covered by Matter 5: Policies SP4, SP6, CDMP3 and EP5

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 – Appendix 5 [November 2021]

- 1. Are the changes to Policies SP4 and EP5 and the explanation to Policies SP6 and CDMP3 consistent with national policy?**
- 2. Should other policies of the Plan be updated to reflect recent changes to Government policy e.g. climate change and biodiversity net gain?**
 1. The HBF considers that as the Council has already started a full review of the Plan that it is not necessary to update other policies to reflect other recent changes in Government policy, as these will be covered in the full review.