

# WYRE LOCAL PLAN PARTIAL REVIEW (2011-2031) EXAMINATION

## STATEMENT BY WYRE BOROUGH COUNCIL ON THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

### MATTER 2 Housing Need, Requirement and Supply

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#### Issue 1 – Housing Need and Requirement

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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 requirement rather than undertaking a new housing needs assessment?***
- 1.1 Yes – the partial update is justified in using the standard method rather than undertaking a new housing needs assessment.
- 1.2 The Implementation of Policy LPR1 Background Paper<sup>1</sup> sets out the council's justification for using the standard method as the basis for the partial update housing requirement.
- 1.3 Paragraph 61 of the National Planning Policy Framework (NPPF) 2021 sets out that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”*.
- 1.4 Although no definition of exceptional circumstances is provided by either national policy or guidance, the PPG<sup>2</sup> does provide a number of paragraphs where alternative approaches could be justified such as where plans cover more than one area; where strategic policy making authorities boundaries do not align with local authority boundaries; where data is not available; or where there are reorganised local authorities. None of these circumstances apply within Wyre Borough. There are no exceptional circumstance to justify an alternative approach to standard method.
- 1.5 The NPPF 2021 glossary defines Local Housing Need as *“the number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework)”*.
- 1.6 The PPG<sup>3</sup> sets out that the use of the standard method for strategic policy making purposes is not mandatory *“if it is felt that circumstances warrant an*

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<sup>1</sup> Evidence document - EDPR02, Chapter 2

<sup>2</sup> Housing and Economic Needs Assessment 013 (Reference ID:2a-013-20201216); 014 (Reference ID:2a-014-20190220) and 039 (Reference ID:039-20201216)

<sup>3</sup> Housing and Economic Needs Assessment 003 (Reference ID:2a-003-20190220)

*alternative approach but authorities can expect this to be scrutinised more closely as examination”.*

1.7 Therefore, using the standard method to calculate the minimum housing need figure is an expectation in both national policy and guidance. The partial update is justified in using the standard method as a basis for the housing requirement. The NPPF and PPG does not support undertaking a new housing needs assessment.

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

2.1 The partial update does not amend the plan period (2011-2031). During the plan period, there will be years where the housing requirement is 460 dpa (2011 to 2018/19) and years where the requirement is 296 dpa (2019/20 to 2031).

2.2 Paragraph 3.7 and 3.8 in the Implementation of LPR1 background paper<sup>4</sup> set out the rationale for applying the standard method from the year (or monitoring period 2019/20).

2.3 The PPG<sup>5</sup> sets out that “*strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process (emphasis added)”.* Wyre council formally commenced its partial update in February 2020 through a Scoping (regulation 18) consultation, within monitoring year 2019/20. Therefore, it is considered appropriate for the standard method calculation to be used from 2019/20 onwards.

2.4 The Fylde Coast<sup>6</sup> is a single housing market area. The Fylde Local Plan to 2032 (incorporating Partial Review) uses the standard method calculation from 2019. For Wyre, applying the housing requirement figure from 2019/20 also ensures consistency with Fylde Council within the shared housing market area.

2.5 The PPG<sup>7</sup> goes on to say, “*The housing need figure generated using the standard method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities*”. It is therefore appropriate to use the standard method calculation from 2021 to take account of the most up to date calculations and back date this to the commencement date of the partial update in 2019/20 when standard method should apply.

2.6 This approach is justified and consistent with the NPPF and PPG.

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<sup>4</sup> Evidence document - EDPR02

<sup>5</sup> Housing and Economic Needs Assessment 008 (Reference ID:2a-008-20190220)

<sup>6</sup> Blackpool Council, Fylde Borough Council and Wyre Council

<sup>7</sup> Housing and Economic Needs Assessment 008 (Reference ID:2a-008-20190220)

**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?**

- 3.1 No, the circumstances do not exist to support an uplift to the housing figure derived from the standard method.
- 3.2 The PPG<sup>8</sup> identifies circumstances in which it might be appropriate to plan for a higher housing need figure than the standard method indicates, stating, “situations where increases in housing need are likely to exceed past trends because of:
- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
  - strategic infrastructure improvements that are likely to drive an increase in the homes needed locally: or
  - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”
- 3.3 The Implementation of Policy LPR1 Background Paper<sup>9</sup> has considered if there are circumstances, in which it may be appropriate to plan for a higher need. It concludes that there are no circumstances in Wyre where this would apply.
- 3.4 There are no cities or urban centres with an uplift located in Wyre borough where an uplift would apply.

**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?**

***Economic Growth Aspirations***

- 4.1 No, there are no economic growth aspirations to justify increasing the housing requirement.
- 4.2 It is clear that the PPG only requires an uplift adjustment where there are specific growth strategies in place to promote and facilitate additional growth, such as housing deals. In Wyre, there are no housing deals or similar arrangements to facilitate additional housing growth in the borough.

***Strategic Infrastructure Improvements***

- 4.3 No, there are no strategic infrastructure improvement that are not already planned for.
- 4.4 There are no strategic infrastructure improvements likely to drive an increase in the homes needed locally. Instead, all infrastructure improvements currently

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<sup>8</sup> Housing and Economic Needs Assessment 010 (ID:2a-010-20201216)

<sup>9</sup> Evidence document - EDPR02, section 3

underway or planned to be implemented in Wyre were identified in the Infrastructure Delivery Plan and underpin the housing allocations currently set out in the WLP31. The infrastructure improvements will not drive growth within Wyre beyond the levels of growth already planned for within WLP31.

- 4.5 No representations have identified any strategic infrastructure improvements that they consider is likely to drive an increase in homes needed locally.

***Choice and competition in the housing market***

- 4.6 No, the housing requirement should not be increased for choice and competition in the housing market. The housing land supply which remains unaltered by this partial update provides significant flexibility over the plan period.
- 4.7 Over the plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dwellings per annum (dpa) (WLP31) between 2011-2018/2019 and 296 net additional dpa (Standard Method) between 2019/20-2031.
- 4.8 The partial update does not make any revisions to the existing housing land supply. The housing requirement does not constrain housing land supply.
- 4.9 There is a projected housing delivery of 9,585 dwellings over the plan period, exceeding the housing requirement of 7,232 by 2,353 dwellings (at 31 March 2022)<sup>10</sup>. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the plan period to allow for choice and competition. Therefore, there is no need for additional allocations to meet the identified housing requirement.

***Affordable housing need***

- 4.10 No, affordability is baked into the standard method. The housing requirement should not be further increased to take into account affordable housing need.
- 4.11 The PPG<sup>11</sup> sets out the methodology for calculating the local housing need using the standard method. In “*step 2 – An adjustment to take account of affordability*” requires an adjustment to be made to the average annual projected household growth figure (calculated at step 1) to take account of the affordability of the area. The assessment of affordability is therefore built into the standard method via the affordability ratio adjustment. There is no need to further uplift the housing requirement to account for affordability.
- 4.12 This approach differs to that of housing OAN that was undertaken for the WLP31, which included consideration of affordability as an uplift as there was no affordability ratio adjustment baked in. That assessment was produced prior

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<sup>10</sup> Please note that these numbers will differ from that included in the Submission Wyre Local Plan (2011-2031) (incorporating partial update of 2022), which were based on the Housing Implementation Strategy, at 31 March 2021.

<sup>11</sup> Housing and Economic Needs Assessment 004 (ID: 2a-004-20201216)

to the introduction of the new standard method approach and subsequent revisions to national planning policy and guidance.

4.13 The PPG<sup>12</sup> identifies circumstances in which it might be appropriate to plan for a higher housing need figure than the standard method indicates, stating, *“situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvement that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.”*

4.14 Whilst acknowledging that the above circumstances justifying an uplift in the local housing need figure are not exhaustive, the council considers the PPG to be instructive on this matter and the affordable housing need is not identified as a circumstance to justify an uplift to local housing need figure. This is because an affordability adjustment is already applied.

4.15 The PPG<sup>13</sup> states *“The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups”*. It goes on to state that *“the household projections that form the baseline of the standard method are inclusive of all households”* and that *“Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies”*.

4.16 The PPG is clear that the standard method is inclusive of the housing needs of all groups and households, including affordable housing. It is also clear that local authorities should reflect the needs of different groups through planning policies rather than via an uplift to the standard method.

4.17 The proposed housing requirement in the partial update does not impact upon the delivery of affordable housing from that found sound in the WLP31, which sought to make progress in addressing affordable housing need.

4.18 It is important to note that the delivery of affordable housing is driven by market housing delivery. Policy HP3 of the WLP31 requires developments of 10 or more (net) dwellings to provide 30% affordable housing, subject to specific viability restrictions in certain settlements reducing the requirement to 10% or nil. Policy SP7 of the WLP31 also includes the exemption where site specific viability results in a reduction or nil affordable housing contributions. The HIS at 31 March 2022 identifies a total supply of 2,351 affordable homes<sup>14</sup> for the plan period.

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<sup>12</sup> Housing and Economic Needs Assessment Paragraph 010 (ID:2a-010-20201216)

<sup>13</sup> Housing Needs of Different Groups Paragraph 001 (ID:67-001-20190722)

<sup>14</sup> A total of 910 affordable housing completions between 2011/12 and 2021/22; a total of 1,441 affordable housing supply between 2022/23 and 2030/31.

- 4.19 Neither the NPPF or the PPG require affordable housing need to be met in full. The WLP31 Inspector's report<sup>15</sup> acknowledges that to meet the long-term affordable housing need in full would require a fourfold increase in affordable housing delivery compared to historic rates and an unrealistic uplift in the overall level of completions. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the WLP31 or that proposed by the partial update. The reasons given in the Inspectors report continues to apply to the partial update and it is noted that there is no requirement in the NPPF or PPG to meet the affordable housing need in full.
- 4.20 The partial update does not prejudice the delivery of existing site allocations in the WLP31, which remain unchanged.

**5. *Do recent levels of delivery in the Council area justify a higher housing requirement?***

- 5.1 No, they do not.
- 5.2 The partial update housing trajectory<sup>16</sup> illustrates projected housing delivery over the plan period. Over the plan period, the trajectory includes 'peaks' and 'troughs' with: lower housing delivery at the start of the plan period; a 'peak' in delivery within the years following in the plan's adoption in 2019, which is further emphasised by the WLP31 not including restrictive site phasing; and a decline in housing delivery at the end of the plan period, which reflects supply being moved forward. This 'peak and trough' projection is also reflected in the WLP31 housing trajectory, which was found sound.
- 5.3 The 'peak' in annual delivery over recent years should not form a new benchmark assessment of need that reflects the shortfall in delivery at the start of the plan period. It is only appropriate to consider previous housing delivery since the start of the plan period in 2011 (11 year period). This is more representative of long-term trends and avoids natural 'peaks and troughs' over the plan period. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the plan period.
- 5.4 Relying on the evidence set out in the HIS<sup>17</sup>, the average level of housing delivery since 2011 is 385 dpa, the council does not consider this to be 'significantly' greater than the outcome of the standard method at 296dpa.
- 5.5 Over the plan period, housing delivery is projected at 9,585 dwellings, exceeding the housing requirement of 7,232 by 2,353 dwellings (at 31 March 2022). This includes significant flexibility in housing land supply over the plan period and does not prejudice the delivery of the existing site allocations in the WLP31, which remain unchanged.

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<sup>15</sup> Evidence document - EDPR08, paragraph 61

<sup>16</sup> Included in the Housing Implementation Strategy, appendix 11, examination library - EL1.006

<sup>17</sup> Examination library – EL1.006

**6. How should the 380 dwellings provided through the Fylde LP Partial Review to meet Wyre's needs be accounted for?**

- 6.1 The partial update meets Wyre's housing need in full.
- 6.2 It would not be appropriate for Wyre's partial update to include an uplift to account for the 380 dwellings, this is already accounted for within Fylde Local Plan to 2032 (Incorporating Partial Review). Fylde and Wyre are part of the same housing market area, to include an uplift in Wyre's partial update would result in double counting.
- 6.3 A main modification<sup>18</sup> is proposed to the duty to cooperate section to acknowledge that Wyre is able to meet its housing needs in full. This would be a material consideration in decision making in Fylde.
- 6.4 Any amendment to Fylde's Council's stated housing requirement is a matter for them and any future review of the Fylde Local Plan to 2032 (Incorporating Partial Review) and has no bearing on the Wyre Local Plan (2011-2031) (incorporation partial update of 2022). It is beyond the powers of Wyre's partial update process to make any changes to the adopted Fylde Local Plan.

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**Issue 2 – Implications of the housing requirement**

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**7. Have the implications of using the reduced housing requirement for the Plan strategy as a whole been taken into account?**

- 7.1 Yes, it has.
- 7.2 The partial update does not make any revisions to the existing housing land supply. The housing requirement does not constrain housing land supply.
- 7.3 The scope of the partial update is established by Policy LPR1 of the WLP31. It is a narrowly focused update which principally directs itself to matters relating to the borough's objectively assessed housing need. A update of the development strategy falls outside the scope of this partial update and no revisions are proposed.
- 7.4 The partial update revises the housing requirement but does not make any revisions to the existing housing land supply, therefore the housing strategy is not altered and does not have implications for the plans strategy as a whole.

**8. In particular,  
(a) Will the Plan as reviewed deliver the affordable homes needed?**

- 8.1 Yes, it will.

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<sup>18</sup> E/MM/13

- 8.2 Neither the NPPF or the PPG require that affordable housing needs are met in full. The WLP31 Inspector's report<sup>19</sup> acknowledges that to meet the long-term affordable housing need in full would require a fourfold increase in affordable housing delivery compared to historic rates and an unrealistic uplift in the overall level of completions. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the WLP31 or that proposed by the partial update. The reasons given in the Inspectors report continues to apply to the partial update and it is noted that there is no requirement in the NPPF or PPG to meet the affordable housing need in full.
- 8.3 The partial update does not prejudice the delivery of existing site allocations in the WLP31, which remain unchanged by the partial update. The proposed housing requirement in the partial update does not impact upon the delivery of affordable housing from that found sound in the WLP31.

*In particular,*

***(b) Will the reduced figure constrain jobs and economic growth, including in connection with initiatives such as the Hillhouse Enterprise Zone?***

- 8.4 No, it will not constrain jobs and economic growth, including at Hillhouse Technology Enterprise Zone (EZ).
- 8.5 A review of the employment strategy falls outside the scope of the partial update.
- 8.6 The employment strategy in the WLP31 supports job creation, allows for the sustainable growth of existing businesses and supports the ambitious growth proposals at the EZ.
- 8.7 The Employment Monitoring Report<sup>20</sup> demonstrates a pattern of continued low employment land uptake in Wyre, falling below that projected in the WLP31. This could be expected due to the lead in time for enabling infrastructure and that 15.1 hectare of a total 32.89 hectares allocation is allocated as part of a mixed use site allocation. Regardless of this, the overall uptake of employment land (including windfall sites) has declined in recent years, which may be associated with economic uncertainty, Covid-19 pandemic and changing working patterns. It is clear that the economic strategy is not delivering as intended, with average completions since 2011 at 1.7 hectares which falls below the objectively assessed employment need of 2.1 hectares<sup>21</sup>.

*EZ*

- 8.8 A masterplan for the EZ was adopted 2018 and included job projections which fed into the Employment Land Study Addendum (2017)<sup>22</sup> that supported the WLP31.

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<sup>19</sup> Evidence document - EDPR08, paragraph 61

<sup>20</sup> <https://www.wyre.gov.uk/evidence-monitoring-information/economy-evidence/4>

<sup>21</sup> The OAEN in WLP31 is 43 hectares, an average of 2.1ha per annum 2011-2031.

<sup>22</sup> <https://www.wyre.gov.uk/downloads/file/696/ed-107-employment-land-study-update-addendum-ii-july-17->



- 8.9 To deliver the ambitious growth projections, unlocking vacant land within the EZ requires significant infrastructure provision, a new dedicated highway access and site remediation.
- 8.10 Since 2017, job projection at the EZ have not materialised; the proposed gas fired power station, which would have also delivered the new highway access; large scale waste to energy plant and the speculative development zone have not materialised. There have also been job losses due to Covid-19 and a key employer has relocated due to supply chain constraints.
- 8.11 Wyre council and the primary landowner, NPL Estates have secured Government funding<sup>23</sup> for some initial infrastructure upgrades, however significant infrastructure is still required. Due to the large scale heavy industrial nature of the major development proposals for the EZ, this can only be brought forward after a prolonged period of pre-development activity, the high cost of this infrastructure, uncertainty in the market and volatility in price subsidy in the energy sector is impacting on securing investor commitment, who are not willing to provide the necessary infrastructure speculatively at risk.
- 8.12 There is also uncertainty regarding the reopening of the Fleetwood-Poulton Railway line that dissects the EZ. In June 2022, the Government announced<sup>24</sup> funding for the development of a Strategic Business Case, which will take over two years to identify the preferred option and associated cost. This will have implications for how the new highway access traverses the rail line; an at-grade crossing or bridge at circa £3.5million. Without the new access, limited development can occur in the EZ.
- 8.13 There is significant economic uncertainty. Job growth remains significantly below 2017 projections considered by the WLP31 and continued uncertainty over new infrastructure remains. Whilst the council are continuing to proactively work with NPL Estates and key stakeholders, revised job projections are necessary.
- 8.14 The council are currently preparing to commission an updated masterplan, including new job and economic projection. The updated job projections for the site and its consequences for the Local Plan will be considered within the full review currently underway. The partial update will not constrain the EZ if infrastructure constraints can be overcome.
- 8.15 The partial update retains all existing residential and employment site allocations from the WLP31 that found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy.

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<sup>23</sup> £0.5 million of grant funding from the Governments Getting Building Fund

<sup>24</sup> The Restoring Your Railway Fund Programme

**9. Would an alternative housing requirement figure, e.g. 479 dpa, be justified, based on up to date evidence?**

9.1 No, it would not.

9.2 Paragraph 61 of the NPPF 2021 sets out that *“to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals”*.

9.3 The NPPG<sup>25</sup> goes on to set out that the use of the standard method for strategic policy making purposes is not mandatory *“if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely as examination”*.

9.4 Therefore, using the standard method to calculate the minimum housing need figure is an expectation in both national policy and guidance.

9.5 The Implementation of Policy LPR1 Background Paper provides the up to date evidence on the housing requirement in accordance with the NPPF and PPG.

**10. What implications would there be for the WLP and WLPPR, if an alternative housing requirement figure was justified?**

10.1 An assessment of the implications of an alternative housing requirement has not been undertaken as part of this partial update, as they are not considered reasonable alternative options.

10.2 It would be the role of the Sustainability Appraisal (SA) to undertake the assessment of the implications as part of considering reasonable alternative options. As set out in response to matter 1, issue 3; the council does not consider there are reasonable alternative options to the local housing need figure of 296dpa.

10.3 To fulfil the requirements of Policy LPR1, the council has brought forward a partial update of the Local Plan with the objective of meeting the full Objectively Assessed Housing Need (now referred to as the Local Housing Need (LHN) as per the 2021 NPPF). For Wyre, no exceptional circumstances exist to justify an uplift to the standard method.

10.4 The assessment of a housing requirement in excess of the local housing need figure of 296dpa, is not a reasonable alternative option and should not be assessed as part of the SA.

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<sup>25</sup> Housing and Economic Needs Assessment 003 (Reference ID:2a-003-20190220)

**11. *Should the employment land requirement be amended taking into account the reduced housing requirement?***

11.1 No, it should not.

11.2 The scope of the partial update is established by Policy LPR1 of the WLP31. It is a narrowly focused update, which principally directs itself to matters relating to the borough's objectively assessed housing need. A review of the employment land requirement falls outside the scope of this partial update and no revisions are proposed.

11.3 It will be the role of the Full Review to consider the implications of the economic strategy and underperforming EZ. The economic strategy is impacted by current economic uncertainty, the consequences of the Covid-19 pandemic and changing working patterns. These matters should be considered as part of a full review.

11.4 It will be the role of the Full Review to consider the economic strategy.

**12. *Are there any significant implications for the soundness of the Plan, if the employment land requirement is not altered?***

12.1 No, there is not.

12.2 The scope of the partial update is established by Policy LPR1 of the WLP31. It is a narrowly focused update, which principally directs itself to matters relating to the borough's objectively assessed housing need. A review of the employment land requirement falls outside the scope of this partial update and no revisions are proposed.

12.3 The partial update does not make any revisions to the existing housing or employment land supply. The housing requirement does not constrain housing or employment land supply.

12.4 The current economic strategy and employment land requirement in the WLP31 was found sound. Since the plans adoption in 2019, the take up of employment land on allocated sites has been slow. This is not unexpected during the initial post adoption phase as the employment supply includes many mixed use site allocations, where the residential element seeks to support the employment element.

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**Issue 3 – Housing Supply**

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

13.1 Yes it will.

13.2 The table<sup>26</sup> set out below summarises the up to date housing supply position (at 31 March 2022) for the plan period (2011-2031):

		Number of Dwellings
a.	Completions 1 April 2011 - 31 March 2022	4,239
b.	Large sites with planning permission at 31 March 2022	691
c.	Small sites with planning permission (discounted by 10%)	295
d.	Allocated sites (Policies SA1, SA3 & SA4) with planning permission	3,068
e.	Allocated sites (Policies SA1, SA3 & SA4) without planning permission	992
f.	Windfall allowance 2025/26 – 2031 (50x 6yrs)	300
	TOTAL	9,585 <sup>27</sup>

13.3 Three main modifications (MM) are proposed to the partial update to provide the up to date housing supply position at 31 March 2022. The following MM are proposed:

Main Modification Reference	Part of Plan
E/MM/14	Chapter 4: Local Plan Strategy, ¶4.1.18
E/MM/16	Chapter 7: Housing, ¶7.2.2
E/MM/35	Appendix E: Housing and Employment Growth

13.4 The MM (E/MM/34) to Appendix E shows the up to date proposed total residential development in each settlement (at 31 March 2022). This includes the delivery of 44 dwellings beyond the plan period. It also excludes a windfall allowance and does not apply a 10% lapse rate to small sites with planning permission, which are included in the Local Plan housing supply (E/MM/16).

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

14.1 No, there is not. The site allocations are overall delivering as expected and there is no conclusive evidence to indicate that the allocations will not be delivered in the remaining nine years of the plan period.

14.2 The partial update sets out the housing requirement in the proposed amended

<sup>26</sup> The summary table is included as Main Modification E/MM/16

<sup>27</sup> As shown in the March 2022 housing trajectory, from a total remaining allocation of 4,104 dwellings only 4,060 are expected to be delivered within the Local Plan period to 2031.

Policy HP1. The requirement is for a minimum of 7,232 net additional dwellings between 2011 and 2031.

- 14.3 The Implementation of Policy LPR1 Background Paper<sup>28</sup> undertook a 'sense check' on the delivery of site allocations against the housing requirement. It identified a net surplus of 244 dwellings above the allocation position. This demonstrates that the allocations will continue to meet the anticipated delivery of 5,192 over the plan period.
- 14.4 The sense check reveals that there are only two allocations which do not currently benefit from a planning permission or have pending planning applications. These two sites, SA1/3 Land between Fleetwood Road North and Pheasant Wood, Thornton and SA3/1 Fleetwood Docks and Marina, Fleetwood together amount to just 273 units from the 5,192 allocated by WLP31.

*SA3/1 Fleetwood Docks and Marina, Fleetwood*

- 14.5 The site is a mixed use allocation for employment and residential. It is allocated for 120 dwellings. There is no evidence that the dwellings will not be delivered in the remaining nine years of the plan period.
- 14.6 The council are working proactively alongside the landowner to facilitate the sites redevelopment and have secured Government funding<sup>29</sup> to unlock the first phase. This includes a purpose built new facility to relocate existing fish processors to unlock the wider site and enabling infrastructure for residential development. The council purchased the new fish park in August 2022. The site clearance and enabling infrastructure is expected to be completed by summer 2023.

*SA1/3 Land between Fleetwood Road North and Pheasant Wood*

- 14.7 Wyre Council sold the site to Eccleston Homes in May 2022<sup>30</sup>. A full planning application for 188 dwellings for the whole site allocation was submitted in July 2022. There is no evidence that the dwellings will not be delivered in the remaining nine years of the plan period.

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

15.1 Yes it does.

- 15.2 The Housing Implementation Strategy (HIS)<sup>31</sup> shows that at 31 March 2022, there is a housing supply position of 11.17 years based on 296dpa. It is considered that it is a robust supply and provides choice and competition in the

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<sup>28</sup> Evidence document – EDPR02, section 5 and appendix 6 (at 31 March 2021 base date)

<sup>29</sup> Getting Building Fund

<sup>30</sup> Wyre Council Cabinet Minutes, 1 June 2022

<https://wyre.moderngov.co.uk/documents/g1731/Printed%20minutes%2001st-Jun-2022%2017.00%20Cabinet.pdf?T=1>

<sup>31</sup> Examination library - EL1.006, page 13-14

market for land and flexibility should allocated sites be delivered at a slower pace than anticipated.

- 15.3 The HIS has been subject to consultation and stakeholder engagement with relevant developers, landowners and agents in relation to their specific sites. Stakeholder engagement has been conducted annually since 2017 with pro-formas for each site recording details on the planning status, expected future housing delivery and notes of previous engagement, their response and matters of agreement.
- 15.4 The consultation and stakeholder engagement process has allowed the council to gain valuable insight into the timelines involved in bringing forward a housing site for development by engaging directly with those who have the most ability to impact upon the delivery of their sites.
- 15.5 This process has provided a robust basis to support the council in preparing its annual five year housing supply statement and demonstrates the existence of a 5 year housing supply. As the HIS makes clear, based on 296 dwellings per annum, there is a five year housing land supply of 11.17 years. There is no reason to doubt that a five year supply exists.
- 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?***
- 16.1 No, there will not be insufficient housing supply. As set out in response to question 15, based on 296 dwellings per annum, there is a five year housing land supply of 11.17 years.
- 16.2 No, there will not be too much flexibility in the supply.
- 16.3 Over the plan period, the partial update housing delivery is projected at 9,585 dwellings, exceeding the housing requirement of 7,232 by 2,353 dwellings. This includes additional flexibility over the plan period and does not prejudice the delivery of the existing site allocations in the WLP31, which remain unchanged. The partial update results in significant flexibility.
- 16.4 At 31<sup>st</sup> March 2022, only SA3/1 Fleetwood Dock and Marina, Fleetwood does not currently benefit from a planning permission or have pending planning applications at SA which amounts to only 120 units from the 5,192 allocated by the WLP31. Therefore, if deallocation was within the scope of the partial update, and it was appropriate to align the housing supply, there would be limited opportunity to undertake meaningful deallocation of site allocations.
- 16.5 The scope of the partial update is established by Policy LPR1 of the WLP31. It is a narrowly focused update, which principally directs itself to matters relating to the borough's objectively assessed housing need. The deallocation of housing allocations falls outside the scope of this partial update and no revisions are proposed.