



## Implications of Possible Revisions to the Partial Review Housing Requirement

### 1. Reversion to 415 dpa for 2019-2032

The following consequences would result from modifying the Partial Review to include a housing requirement of 415 for the remainder of the plan period:

- The Council's identified needs of 275 dpa would be met and substantially exceeded;
- As a result there would be a presumption in accordance with the PPG Para:015 Ref ID: 2a-015-20190220 that the housing requirement is sound;
- The backstop position to provide for Wyre Council's unmet need would be satisfied, providing that the plan was further modified to explain the excess of the housing requirement above identified needs
- The development strategy and allocations would be retained in full
- Choosing a figure that is substantially in excess of assessed housing needs could, based on the Council's understanding of likely delivery on sites, result the emergence of a shortfall on 5 year supply within the short to medium term, if the development industry does not deliver as anticipated.
- If this were the case, by operation of §11(d) and Footnote 7 NPPF, the tilted planning balance could apply soon after the adoption of the Partial Review. The sustainable development strategy in the plan would be replaced by an unplanned approach to development throughout the borough, contrary to the objective of a plan-led system in the Framework.
- The delivery of the large strategic sites intended to bring forward most development in the latter years of the plan period would be undermined by competition from medium sized sites including those being advanced by representors to the Partial Review as well as a larger number of smaller less sustainable sites. The effect on delivery of the largest site would also be detrimental to the development strategy of Blackpool, in which it partly lies.
- The housing requirement would support the economic aspirations for the Borough but following the application of the tilted balance there is no clear evidence that the subsequent housing delivery would support the overall strategy of the plan;
- The risk to the delivery of the largest strategic sites through the application of the tilted balance would undermine and probably hamper delivery of the strategic infrastructure on those sites including new schools, strategic areas of public open space and a local centre.

## 2. Revision to 275 dpa for 2019-2032

The following consequences would result from the modification of the Partial Review to make the housing requirement 275 dpa for the remainder of the plan period:

- The Council's identified need for base date 2019-20 of 275 dpa would be met, and the updated identified need for base date 2020-21 of 272 dpa would be exceeded;
- As a result it could be said there would be a presumption in accordance with the PPG Para:015 Ref ID: 2a-015-20190220 that the housing requirement is sound;
- The backstop position to provide for Wyre Council's unmet need would not be met through the housing requirement and therefore it is questionable whether the provisions of FLP32 paragraph 1.27 would be fulfilled. Accordingly, an amendment would require the addition of a further section of text in the policy to explain that the housing requirement would increase in the event that Wyre's Partial Review was adopted with unmet need of up to 380 dwellings. The housing allocations in the plan would remain and therefore sufficient dwellings would be planned for to ensure that a reasonable level of unmet need could be met through the delivery of those sites.
- Providing that the development strategy and allocations are retained in full, the council will be able to facilitate development through a plan led system in accordance with government objectives.
- Choosing a figure that fulfils but does not exceed identified housing needs is highly likely to ensure the Council maintains a five year supply for the remainder of the plan period.
- The most important policies would remain up-to-date and would continue to support the delivery of the sustainable development strategy within the plan.
- The delivery of the large strategic sites intended to deliver the largest part of development in the latter years of the plan period would be supported as essential to the delivery of the sustainable development strategy in the plan.
- The housing requirement would result in a misalignment between the economic development strategy for the plan and the housing requirement. Although in practice a higher level of housing delivery would be likely, the housing requirement would not fully support the overall development strategy in the plan.

Housing need would be established in line with the standard methodology (a primary reason for conducting the review) and would, therefore, align with the figure used in assessing the housing delivery test.

## Conclusion

The Council's proposal for the housing requirement expressed as a range would ensure that the benefits of planning for the higher number in terms of the support for all aspects of the development strategy and provision for all of the existing economic ambitions of the plan would be maintained, as well as provision of the backstop position to address unmet need in Wyre. The inclusion of the lower figure would ensure that needs are met and that the plan strategy is not

compromised. The housing requirement range therefore provides the most effective solution for the Partial Review, and is also positively-prepared, justified and compliant with national policy.