



Statement of Consultation

Annex 1- Regulation 18 (Scoping) Consultation Responses

Submission Draft Wyre Local Plan Partial Review (2011-2031)

April 2022



Wyre Council

Partial Review of the Wyre Local Plan 2011-2031

Summary of Responses to the Regulation 18 Consultation, Scope of the Partial Review and Next Steps

May 2020

1. Introduction

The Wyre Local Plan 2011 – 2031 (WLP31) was adopted on the 28 February 2019 and contained within it Policy LPR1. Policy LPR1 required the early partial review of the WLP31 with the objective of meeting the full objectively assessed housing needs over the plan period. Therefore, exactly one year after adoption, Wyre Council undertook a consultation on the scope of a partial review.

This document sets out the reasoning behind that consultation, the responses received, any changes to the scope of the partial review, any action to be taken by the Council and the next steps in the partial review of the WLP31. For completeness each of the responses received is set out in full in the appendix to this document.

2. Purpose of Partial Review

The Council considered it necessary to undertake a partial review for two reasons;

- a. The WLP31 includes Policy includes Policy LPR1 – Wyre Local Plan Review which requires the early partial review of the WLP31 with the objective of meeting the full objectively assessed housing needs over the plan period. The Policy sets out the matters to be included in the partial review including an update of objectively assessed needs and review of transport and highways issues.
- b. The WLP31 was adopted on 28 February 2019, it was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). A revised NPPF was published in February 2019 (NPPF19) and includes Annex 1: Implementation. This part (specifically at §212) states that Plans may need to be revised to reflect policy changes which the replacement framework has made. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan.

In summary the WLP31 requires a review of the local plan and clearly sets out the scope of the review in Policy LPR1. The scope as set out in Policy LPR1 is the scope of the partial review that the Council intends to carry out and it is this scope that has been consulted upon. In addition, and in-line with §212 of NPPF19 the partial review will also include a consideration of matters of conformity between the WLP31 and the NPPF19 and any consequential changes to be made thereafter. This will ensure that any issues of conformity arising from the changed government policy are addressed but does not involve a review of all policies in the WLP31.

3. Consultation

The consultation was launched on 28 February 2020 and ran for a period of just over six weeks until 14 April 2020. The Council contacted all consultees held on the Register of Consultees database; 476 in total. 464 sent by email and 12 by letter.

In addition, the letter (Appendix B) was posted on the Council's website, copies were held at the Council's offices (The Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU) and copies also on display at all libraries throughout the borough of Wyre.

Responses were invited either by email (to planning.policy@wyre.gov.uk) or by post to Planning Policy, Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU. It was made clear to all respondents that all comments will be published, and apart from the name of the sender no other personal information will be publicly available. Any anonymous comments would not be accepted.

In total 15 responses were received, all by email. During the consultation period the Government introduced measures to deal with the outbreak of COVID-19 from 20 March 2020. The Council is not aware of any respondent or consultee being unable to respond to the consultation due to these measures, it is not considered to have had an impact on the findings of the consultation. No responses were received after the deadline, no requests for an extension to the deadline were received.

A summary of the points raised by each respondent is set out in the table below (Appendix A) along with any changes sought and the Council's summary response. All responses received have been read in full and fully taken into account for setting the scope of the partial review of the WLP31.

4. Scope of the Partial Review – Next Steps

The consultation has provided clarity and additional information which has been relied upon to shape the scope of the partial review of the WLP31. The next steps for the partial review of the WLP31 involves the gathering of evidence and the preparation of all necessary accompanying documents for a reviewed local plan. This evidence gathering and preparation of supporting documents will need to be proportionate to the partial review and will of necessity be somewhat less onerous than for the preparation of a new Local Plan.

Therefore, having taken account of all the responses received (at Appendix A) the next steps (in order) will be;

- a. Implementation of the partial review in accordance with the criteria set out in Policy LPR1, namely 1, 2 and 3.
- b. Consideration of matters of conformity with the NPPF19 and production of a schedule of consequential changes to WLP31.

- c. Production, review or update of the following supporting documents taking account of the above points, and the need for proportionality in-line with a partial review;
- I. Sustainability Appraisal Scoping Report
 - II. Sustainability Appraisal
 - III. Strategic Environmental Assessment
 - IV. Equalities Impact Assessment
 - V. Habitats Regulation Assessment
 - VI. Viability Appraisal

5. Appendix Items

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Appendix T – Schedule of Consultees

Appendix A – Table of Consultation Responses, Wyre Council, February 2020

Ref #	Consultee	Method	Date/Time Response Received	Summary of Key text from representation	Summary of Changes sought	Summary of Council Response
1	Louisa Fielden (Avison Young) On behalf of Duchy Homes	Email	14.04.2020 11:06	<p>Duchy Homes object to the removal of the consideration of allocations from the scope of the partial review which is in clear contradiction to the policy that the inspector required for the Plan to be deemed sound.</p> <p>Undertaking an update of Objectively Assess Needs is vital to ensure needs are fully met over the plan period. Should Objectively Assessed Needs identified be higher than that met by the allocations in the adopted Local Plan, then allocations will logically therefore need to be reviewed. Removing the review of allocation from the scope of the review at this stage (i.e. before the updated OAN is known) is unjustified, and pre-judges the outcome of the update to the OAN.</p>	<p>There is a need for the Council to review and consider further/additional site allocations within the Local Plan, dependent on the review of Objectively Assessed Needs and the progress of developments on allocated sites. A review of allocations should be part of the scope for the partial review as required by Policy LPR1 of the Local Plan and NPPG.</p> <p>It is requested that Land at Calder House Lane is included as an allocation...the site represents a logical and sustainable extension to Bowgreave and is suitable, available and achievable site for housing development.</p>	<p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p> <p>Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps.</p>
2	Matt Verlander (Avison Young) On behalf of National Grid	Email	14.04.2020 14:37	<p>Provided details and locations of National Grid gas and electric transmission assets in the borough of Wyre.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>	None	<p>The Council will, as always, continue to engage with National Grid on the progress of the partial review of the WLP31.</p>
3	Nicky Mason Barnacre-with-Bonds Parish Council	Email	23.03.2020 10:15	<p>The Parish Council requests that when Wyre Planning review the objectively assessed housing needs...they consider the latest available data. The ONS has recently published 2016 based Household Projections. These supersede the 2014-based projections which were a key input into Wyre Council's determination of the objectively assessed housing needs.</p> <p>In addition the Government within its National Planning Policy Framework has revised its methodology for calculating local housing needs.</p>	<p>The Parish Council requests that the revised data and methodology are used when determining Wyre Council's objectively assessed housing needs and the allocation of development sites for this review of Wyre Local Plan to 2031.</p>	<p>The first step (of 3) to implementing Policy LPR1 Wyre Local Plan Review will include an update of Objectively Assessed Housing Needs. This will take account of the most up to date government guidance on data sources.</p> <p>The NPPF19 introduced the Standard Method as a means of calculating local housing need; this will be taken into account in completing the first step (of 3) of Policy LPR1 Wyre Local Plan Review.</p>
4	Jane Saleh Blackpool Council	Email	14.04.2020 12:38	<p>... we note that it is not clear at this stage whether Wyre Council will adopt a housing need figure in line with Standard Method or propose a higher level of housing demonstrating exceptional circumstances...welcome continued engagement on housing matters through the Duty to Co-operate.</p> <p>...[with reference to Para 74 of the Inspectors Report] where he raises concerns regarding housing allocations at Inskip and Forton 'In light of the above we consider that the implications of undertaking highways assessments and consideration of sustainable modes of transport can be maximized means that the partial review does require a review of housing site allocations and potentially strategic options (see para 72 of Inspectors report).</p>	<p>Continued engagement on housing need matters through the Duty to Co-operate arrangements.</p> <p>Partial review does require a review of housing site allocations and potentially strategic options.</p>	<p>The Council will, as always, continue to engage with Blackpool Council on the progress of the partial review of the WLP31, making full use of all of the Duty to Co-operate options.</p> <p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p>

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						Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps
5	Stephen Harris (Emery Planning) On behalf of several clients	Email	14.04.2020 15:52	<p>We acknowledge the need for a partial review of the local plan in accordance with Policy LPR1. It is noted from the email circulated to interested parties by the Council that there will be no changes made to allocations already made through the adopted local plan. We fully support this approach.</p> <p>In terms of housing, the standard method should be the starting point for establishing the housing requirement for the Borough. From experience the standard method does not address affordable housing needs in many local plan authority areas, and we see this is an important component of the evidence base. Other potential considerations is whether or not there is a need to uplift the standard method for economic reasons and to take account of the needs of households not including [sic] in the household projects such as C2 institutional uses.</p> <p>The Council will need to consider whether any deliverability issues for key site allocations have arisen and how the current Covid19 restrictions are likely to undermine delivery. This is particularly important for site allocations where the Council requires a Masterplan to be agreed in advance of any planning permission being granted. This policy should be reviewed.</p>	<p>Partial review should not include any consideration of allocations already made.</p> <p>Standard Method should be used as a starting point for reviewing the local housing requirement figure with consideration given to economic matters, affordable housing and institutional accommodation.</p> <p>Deliverability of housing should be reviewed in light of the ongoing response to Covid19.</p>	<p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p> <p>Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps.</p> <p>The NPPF19 introduced the Standard Method as a means of calculating local housing need; this will be taken into account in completing the first step (of 3) of Policy LPR1 Wyre Local Plan Review.</p> <p>A consideration of the deliverability of a five year supply of housing land and the ability of allocations to meet in full any OAN/LHN will be a core element of any Examination in Public on the 'reviewed' WLP31.</p>
6	Mark Evans Fylde Borough Council	Email	09.04.2020 15:49	<p>The consultation letter makes reference to the two triggers that have prompted the need for the Partial Review. The first is the matter of the requirements of the National Planning Policy Framework (February 2019) paragraph 212, for the revision of the plan to reflect policy changes in the new Framework. In this respect, Wyre Council is in a similar position to Fylde Council in that the examination of both plans continued and both were adopted under the transitional arrangement of paragraph 214 of the new Framework. Fylde Council supports the inclusion of this element within the Partial Review and Wyre Council's efforts to ensure that its Local Plan remains compliant with national policy.</p> <p>The consultation letter simply notes that the matters include an update of objectively assessed needs and review of transport and highway issues. However, it will be necessary for the Partial Review to include all elements of the requirements set out in Policy LPR1, even if the conclusion is that certain elements are not required to achieve the objective of the policy.</p> <p>The consultation then invites representations into the scope of the Partial Review but qualifies this by stating:</p>	<p>It will be necessary for the Partial Review to include all elements of the requirements set out in Policy LPR1, even if the conclusion is that certain elements are not required to achieve the objective of the policy.</p> <p>Therefore, the Partial Review cannot dismiss potential sites without assessment until a revised needs assessment has established that no additional sites need to be identified. If a need for additional sites is identified, this will trigger a requirement to review the availability of additional sites.</p>	<p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p> <p>Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps.</p> <p>The consultation letter/email issued by the Council included brevity as a necessity. The letter clearly included appropriate reference to Policy LPR1 of the WLP31. It is plain that no individual could have been misled.</p>

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				<p>'However it should be noted that revisions to allocations, for example, will not fall within the scope of this partial review and will not be taken forward.'</p> <p>This directly contradicts the requirement of part 3 of Policy LPR1. It could be that the part 3 of Policy LPR1 might not be necessary following the assessments in parts 1 and if necessary 2. However, in the absence of any indication at this stage as to the method to be used for the reassessment of housing needs in part 1, the retention of parts 2 and 3 in full is necessary for the Partial Review to comply with the policy. Therefore, the Partial Review cannot dismiss potential sites without assessment until a revised needs assessment has established that no additional sites need to be identified. If a need for additional sites is identified, this will trigger a requirement to review the availability of additional sites.</p>		
7	Edwina Parry Garstang Town Council	Email	14.04.2020 15:38	<p>The Town Council are concerned for the future of Garstang Town Centre. Therefore, we request that the suitability of Policy EP4 (Town, District, Local and Neighbourhood Centres) is fully reviewed. The Town Council would also like to consider the creation of a new Supplementary Planning Document (SPD) for the town centre or a specific allocation, which can hopefully ensure that businesses can bounce back from these unprecedented times. These more targeted powers should protect the Town Centre Primary Shopping Areas from out of town competition, explore 'flexible change of use' to help bring redundant shops back into use and offer more detailed advice for business owners.</p> <p>Without an adopted Cil charging schedule we also want to review how infrastructure funding could be better captured. The Town has a number of large residential, mixed use and employment allocations which will all increase pressure on town centre services and amenities. Therefore, it should be possible to better target funding directly in the areas that will be most affected. This funding could be used to ensure that appropriate linkages are provided between these allocations and the Town Centre to ensure business can best capture the increase expenditure that will be created. The key issues include parking provision in the town centre, cycle and pedestrian access and more long-term strategies such as a park and ride train platform.</p>	<p>A review of Policy EP4 of the WLP31</p> <p>A new Supplementary Planning Document for Garstang Town Centre to address infrastructure funding, parking provision in the town centre and cycle and pedestrian access.</p>	<p>In-line with §212 of NPPF19 the partial review will include a consideration of matters of conformity between the WLP31 and the NPPF19 and any consequential changes to be made thereafter.</p> <p>This will ensure that any issues of conformity arising from the changed government policy are addressed but does not involve a review of all policies in the WLP31.</p> <p>For the avoidance of doubt the Council considers a specific review of the suitability or implementation of Policy EP4 Town, District, Local and Neighbourhood Centres to be outside the scope of this partial review.</p> <p>The representation has not raised any issues of conformity with NPPF19 in relation to Policy EP4 Town, District, Local and Neighbourhood Centres.</p>
8	Jake Salisbury Graham Anthony Associates	Email	14.04.2020 10:38	<p>We request that Policy SP4 (Countryside Areas) is included within the review specifically the hierarchy imposed under criterion 4. The implementation of this Policy creates a number of issues for decision makers and we are aware that the text has been reviewed by an external consultant who deemed it flawed. Given the locational characteristics of Wyre's economy, holiday and residential accommodation are deemed equally if not more important than 'live/work units', tourism destinations or employment units. Thus, the approach taken seems onerous driven by 'viability' alone and the prevention of residential accommodation in unsustainable locations.</p>	<p>A review of Policy SP4 of the WLP31</p>	<p>In-line with §212 of NPPF19 the partial review will include a consideration of matters of conformity between the WLP31 and the NPPF19 and any consequential changes to be made thereafter.</p> <p>This will ensure that any issues of conformity arising from the changed government policy are addressed but does not involve a review of all policies in the WLP31.</p> <p>For the avoidance of doubt the Council considers a specific review of the suitability or</p>

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						<p>implementation of Policy SP4 Countryside Areas to be outside the scope of this partial review.</p> <p>The representation has not raised any issues of conformity with NPPF19 in relation to Policy SP4 Countryside Areas.</p>
9	Warren Hilton Highways England	Email	27.03.2020 16:53	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). We are responsible for the operating, managing capacity, maintaining and improving the SRN - the SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Clearly, highways form an important component of the review, but also note the Inspector's original report comments that (28) "... when discussing the housing requirement, I consider that the highway constraints are overstated" and that in seeking to achieve higher levels of growth there was (74) "the need to focus significant development in locations that can be made sustainable and where the use of sustainable transport modes can be maximised is in my view not given sufficient weight in the [transport evidence] analysis...". It is therefore clear that in securing higher levels of housing growth in the borough, it is the wider sustainability of access by different transport modes that must be considered and therefore inform the Review itself.</p> <p>In this way, there is now a need for Wyre Council to develop an updated transport evidence base to inform the Review, and one that is much broader – considering accessibility by and improvements to sustainable modes more seriously as well as highways.</p> <p>A wider transport impacts and needs study is required as part of the evidence base for the Local Plan review. This study should consider all modes of transport for potential infrastructure solutions to support growth, and not just focus on seeing highways infrastructure as being the only answer without properly exploring any alternatives that could form part of a credible wider solution to increased transport demand associated with the Plan growth.</p> <p>As stated in our comments at the Main Modifications stage, it is important to note that, whilst Highways England wishes to be involved with the development of the Wyre Council's transport evidence for the Local Plan review, we believe that this work should be commissioned and led by Wyre Council with the involvement of both Highways England and other transport and infrastructure providers. The recent government policy announcement contained within its Road Investment Strategy 2 (RIS2): 2020 to 2025 document that the A585 trunk road should be detrunked after completion of the A585 Windy Harbour to Skippool Bypass</p>	<p>It is therefore clear that in securing higher levels of housing growth in the borough, it is the wider sustainability of access by different transport modes that must be considered and therefore inform the Review itself.</p> <p>A wider transport impacts and needs study is required as part of the evidence base for the Local Plan review. This study should consider all modes of transport for potential infrastructure solutions to support growth, and not just focus on seeing highways infrastructure as being the only answer without properly exploring any alternatives that could form part of a credible wider solution to increased transport demand associated with the Plan growth.</p> <p>In this way, there is now a need for Wyre Council to develop an updated transport evidence base to inform the Review, and one that is much broader – considering accessibility by and improvements to sustainable modes more seriously as well as highways.</p> <p>It is for Wyre Council to argue that any new calculation of Objectively Assessed Housing Need reveals that the borough is now meeting its housing need requirement over the remainder of the Plan period. Should this be the case, Highways England sees no need for there to be any updated transport evidence base requirement.</p>	<p>The Council is grateful for the level of detail and clarity provided by Highways England. This detail has been taken into account in setting the scope of this partial review.</p> <p>The position of Highways England, in relation to the need for and level of highways and transport evidence, should the local housing requirement figure be met in full by the WLP31 is welcomed and will inform the next steps of the partial review.</p>

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				<p>improvements in 2023 means that it will be important that Lancashire County Council (Highways) are involved in this process.</p> <p>Notwithstanding this, we note the Council's intention to conduct the Local Plan review in the context of the National Planning Policy Framework (2019), and that this may therefore be informed by the latest housing needs assessment methodology. It is for Wyre Council to argue that any new calculation of Objectively Assessed Housing Need reveals that the borough is now meeting its housing need requirement over the remainder of the Plan period. Should this be the case, Highways England sees no need for there to be any updated transport evidence base requirement.</p>		
10	Matthew Symons Hollins Strategic Land	Email	14.04.2020 16:55	<p>Para. 59 - 61 of the IR [Inspector's Report] set out the why the OAN figure was sought by the Council; it supported the Council's strategy of jobs growth, the scale of affordable housing needs, suppressed younger household formations, modest worsening market signals and a notable fall in housing supply over recent years on population projections. It is of course important that the Council fully considers these matters when assessing the updated OAN via the Standard Methodology.</p> <p>Furthermore, with regards the Standard Methodology, the IR stated that the "the Government is considering how the standard methodology should be adjusted to take into account its objective of ensuring that 300,000 homes are built each year" (para. 63). The Council must also take this into account alongside the PPG, which suggests that a reduction in the OAN resulting from the Standard Methodology need not result in changes to the housing requirement of the LP:</p> <p><i>Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method.</i></p> <p>The IR confirmed that significant additional highways evidence was required to support the OAN and the LP beyond the initial five-year supply. This must be prepared and examined via the LP Review.</p> <p>There is potential that the evidence would demonstrate that the identified supply could not come forward as planned. This must be taken into account during the LP Partial Review as it could result in it being necessary for further allocations to be made.</p> <p>It is understood that the Council considers it unlikely that the Partial Review would need to revise existing allocations or consider new allocations given the requirement to update the OAN i.e. the Council considers that the OAN will fall to such an extent that the current LP allocations will not only provide for the revised OAN but also the required flexibility in the supply.</p>	<p>The Council has also obtained information on delivery from developers when preparing its evidence base for the Annual Position Statement and general monitoring. The LP Partial Review must take all of this into account. The new evidence that has been gathered since adoption of the LP could demonstrate that some allocations have to be revised and that new allocations must be made to deliver the OAN and the flexibility in the supply.</p> <p>...If Wyre and Fylde were to work together to concurrently deliver their Reviews, the unmet need could be secured much sooner. The Fylde Review/Revision would have secured housing allocations that could come forward as soon as the WLP Review were adopted.</p> <p>The Partial Review must plan positively to significantly boost housing. It must be recognised that the Standard Methodology produces a minimum figure and the Review must not result in lower jobs growth, reduced provision against the scale of affordable housing needs or suppressed younger household formations. The Review must also provide flexibility in the supply. Furthermore, it must take the opportunity to provide greater certainty on the LP strategy.</p>	<p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p> <p>Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps.</p> <p>Wyre Council wrote to Fylde Borough Council to explore the possibility of joint working and further alignment of partial reviews in March 2020 (Appendix R) and the response was received in March 2020 (Appendix S). This correspondence has informed the scope of the partial review and the next steps. The Duty to Cooperate, which extends to many other organisations, is a continuous and ongoing process.</p>

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				<p>As stated, the Standard Methodology produces a minimum figure, the Council had strong reasoning for its LP OAN and the Government is seeking to significantly boost housing. Part 1 of the LP Partial Review (updating the OAN) could result in a requirement for further allocations. So too could Part 2 (reviewing highways issues) given the significant amount of evidence that was lacking for the LP examination. There is also the requirement to provide flexibility in the supply.</p> <p>The Council has been working with developers on a number of sites via the Masterplanning process. This process has revealed potential delivery issues, suggesting that allocations may not come forward in full during the plan period as anticipated. The Council has also obtained information on delivery from developers when preparing its evidence base for the Annual Position Statement and general monitoring. The LP Partial Review must take all of this into account. The new evidence that has been gathered since adoption of the LP could demonstrate that some allocations have to be revised and that new allocations must be made to deliver the OAN and the flexibility in the supply.</p> <p>However, if Wyre and Fylde were to work together to concurrently deliver their Reviews, the unmet need could be secured much sooner. The Fylde Review/Revision would have secured housing allocations that could come forward as soon as the WLP Review were adopted.</p>		
11	Nicola Elsworth Homes England	Email	14.04.2020 09:53	Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make at [sic] representations at this point.	None	None
12	Mike Ainsworth Inskip with Sowerby Parish Council	Email	19.03.2020 16:32	The Parish Council feels that nothing has changed since the Local Plan was finalised and that therefore the findings of the Inspectors Report on the Local Plan remain valid as they stand. In particular the Parish Council feel that there is no scope for further development at Inskip above and beyond that catered for in the Plan in the foreseeable future	None	None
13	Melissa Wilson (Lichfields) On behalf of Taylor Wimpey	Email	09.04.2020 16:00	<p>It is fundamental that the Council reviews its policies in order to ensure it has a sufficient supply of housing land to meet its full housing need over the plan period, particularly in light of the under provision of housing in the adopted plan. As such, TW supports the Council's intention to undertake an early partial review to ensure the WCLP is consistent with the most up to date National Planning Policy Framework [the Framework] (February 2019) as well as to ensure the Council is meeting its Objectively Assessed Need [OAN] for housing, in full. This aligns with the advice in §19 of the Inspector's Final Report1 [the Inspector's Report] on the WCLP which stated that "it is recognised that an early review of the Wyre LP will be necessary to ensure OAN is fully met over the Plan period".</p> <p>The Framework (§60) states that to determine the minimum number of homes needed in an area, strategic policies should be</p>	<p>In TW's opinion, the Inspector's requirement for an early review within the plan was to ensure the Plan could be found sound at Examination and the full OAN could be met in the longer term. It should not be used as a mechanism to suppress the adopted housing requirement figure.</p> <p>...TW would advocate there is no need at this time to reconsider the housing requirement. Instead, the Review should focus solely on the reason why the Inspector placed the requirement for a review on the Council, namely to meet its full adopted OAN housing requirement figure over the Plan period.</p>	<p>The wording of the consultation letter could be ambiguous. For the avoidance of doubt a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of this partial review of the WLP31 and will be undertaken in accordance with Policy LPR1 Wyre Local Plan Review.</p> <p>Policy LPR1 Wyre Local Plan Review sets out a 3 step approach to the partial review with any consideration of allocations the final of 3 steps.</p> <p>The NPPF19 introduced the Standard Method as a means of calculating local housing need; this will</p>

Ref #	Consultee	Method	Date/Time Response Received	Summary of Key text from representation	Summary of Changes sought	Summary of Council Response
				<p>informed by a Local Housing Need [LHN] assessment, conducted using the standard method as set out in the Planning Practice Guidance [Practice Guidance], unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. However, Practice Guidance makes it clear that this figure represents only the starting point [Lichfields' emphasis] for identifying housing need:</p> <p>"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour." [Lichfields' emphasis]</p> <p>As part of this early review, if Wyre Council are considering deviating away from their adopted housing requirement, it is imperative that they take the full content of the Framework into account. The Framework therefore makes it clear that Wyre Council will need to look at a variety of factors, and not just the standard method, when calculating housing need. The blind adoption of the LHN figure without regard to any other factors, or consideration of whether there are exceptional circumstances, is not an appropriate start and end point for the Council. In TW's opinion, the Inspector's requirement for an early review within the plan was to ensure the Plan could be found sound at Examination and the full OAN could be met in the longer term. It should not be used as a mechanism to suppress the adopted housing requirement figure.</p> <p>This is especially relevant as the LHN is expected to show a reduction in annual housing requirement (as discussed below) compared to the current, adopted figure. Wyre Council must therefore ensure that this Review is not used as a mechanism to reduce its housing requirement in line with the LHN figure as this will have a knock-on impact on other areas of its planning policy such as economic aspirations, provision of affordable homes and a mix of homes to meet local needs. Therefore, TW would advocate there is no need at this time to reconsider the housing requirement. Instead, the Review should focus solely on the reason why the Inspector placed the requirement for a review on the Council, namely to meet its full adopted OAN housing requirement figure over the Plan period.</p> <p>...it is important that the Council, within the Review, ensures that its housing requirement fully supports the WCLP objectives as reducing the housing requirement will have a knock-on impact in respect of associated growth for the area. It is likely that the Government will soon release an updated standard method calculation, therefore any consideration of pursuing a lower figure (in line with the LHN) would be premature, would not be in accordance with the central theme of the Framework or the wider aspirations from the Government to achieve a high level of housing delivery.</p>	<p>It is important that the Council, within the Review, ensures that its housing requirement fully supports the WCLP objectives as reducing the housing requirement will have a knock-on impact in respect of associated growth for the area.</p> <p>TW would therefore expect to see the Council looking to achieve the upper end of their OAN i.e. 479 dpa and not use this as an opportunity simply to reduce their housing figure without considering the knock-on implications in terms of affordable housing delivery and ability to meet the Council's stated economic ambitions for the plan period. TW welcomes that throughout the preparation of the WCLP, the Council recognised that in order to support economic growth sustainably, there was a need to increase the level of housing provided above the LHN which was detailed in the Strategic Housing Market Assessment [SHMA] 2016. TW would therefore expect the Council to take a similar approach to the WLPR in order to meet its OAN in full. Alongside this it is expected that the Council will provide an updated SHMA as part of the WLPR.</p> <p>In undertaking the WLPR, the Council should also seek to ensure that any remaining unmet need is met within the Housing Market Area through effective cooperation and a robust duty to cooperate strategy. TW is aware that Fylde is also in the process of undertaking a review of its Local Plan, to take into account potential unmet need within Wyre, and therefore the Council should maximise this opportunity and ensure it fully engages with Fylde on this matter.</p> <p>TW would also expect that alongside working with neighbouring authorities, the Council will undertake to test delivering a higher proportion of the unmet need within Wyre itself. TW would expect that the Council would test a range of scenarios for delivering the full OAN itself, including directing development towards the more sustainable settlements to deliver more of its housing need.</p> <p>TW would also expect the Council to review opportunities for proposed allocations (both existing or additional, as required) to deliver the necessary infrastructure through developer obligations. Again, this was not addressed as part of the initial Local Plan preparation.</p> <p>...TW would expect to see updated highway capacity analysis submitted alongside this LPR in</p>	<p>be taken into account in completing the first step (of 3) of Policy LPR1 Wyre Local Plan Review.</p> <p>A consideration of the deliverability of a five year supply of housing land and the ability of allocations to meet in full any OAN/LHN will be a core element of any Examination in Public on the 'reviewed' WLP31.</p> <p>Wyre Council wrote to Fylde Borough Council to explore the possibility of joint working and further alignment of partial reviews in March 2020 (Appendix R) and the response was received in March 2020 (Appendix S). This correspondence has informed the scope of the partial review and the next steps. The Duty to Cooperate, which extends to many other organisations, is a continuous and ongoing process.</p>

Ref #	Consultee	Method	Date/Time Response Received	Summary of Key text from representation	Summary of Changes sought	Summary of Council Response
				<p>There is a clear link between worsening affordability and low levels of housing and unless Wyre commit to delivering a higher level of housing, its affordability issues are likely to remain or even worsen. TW would note that suppressing the housing requirement by pursuing the minimum LHN from the standard method cannot be justified, rather the Council should be looking to support higher level of housing delivery in sustainable locations where it can. Similarly, in order to achieve the economic aspirations set out within the WCLP, and meet the current affordable housing targets, the LHN figure would not be sufficient to support this.</p> <p>TW undertook its own highways analysis as part of its representation at the Examination stage. This is not re-appended here as it is now time-expired. However, the analysis highlighted that the Council's assumptions on the scale of the highway constraints were overstated, this was also reiterated by the Inspector in §19 of the Inspector's Report. The analysis TW undertook set out that the highway network could accommodate additional traffic movements, above that being planned for (i.e. the reduced OAN) without causing a severe impact on the highway network. As such, TW considers that the scope of this element will need to include sufficient, robust and up-to-date capacity modelling. TW also set out that it did not consider that the Council's evidence considered in detail if large scale infrastructure improvements could be put in place to alleviate the highway capacity concerns, which will also need to be addressed.</p> <p>It will be important that the review considers not just those schemes that have been delivered, but also those that will be delivered over the Plan period. These are likely to have an impact on the highway's capacity in the Plan Period. Furthermore, additional mitigation measures could be delivered by future planned developments as part of off-site highway improvements. These improvements could be delivered via S.278 works and significantly improve the highway capacity. Again, TW would expect this to be fully explored by the Council as part of the review and it was noted within the Inspector's Report (§72) that this was missing from the evidence base submitted by the Council in support of the WCLP.</p>	<p>order to fully assess the current situation in respect of transport and highways concerns. This would allow the Council to understand fully what, if any, additional capacity has become available since adoption of the WCLP and ensure the Council has sufficient infrastructure to meets its OAN in full.</p>	
14	Charlie Gill Marine Management Organisation	Email	31.03.2020 09:51	<p>Within the document Wyre Local Plan (2011-2031), we recommend reference to the legal duty to co-operate with the Marine Management Organisation, as well as reference to Marine Planning, the Marine Policy Statement, and the Draft North West Marine Plan which is currently out to public consultation and therefore a material consideration.</p> <p>The following policy topics within the Draft North West Marine Plan have been identified after reading the Wyre Local Plan document. They are provided only as a recommendation and we suggest your own interpretation of the Draft North West Marine Plan is completed.</p> <ul style="list-style-type: none"> Fisheries 	<p>Within the document Wyre Local Plan (2011-2031), we recommend reference to the legal duty to co-operate with the Marine Management Organisation, as well as reference to Marine Planning, the Marine Policy Statement, and the Draft North West Marine Plan which is currently out to public consultation and therefore a material consideration.</p>	<p>The existence of the Marine Management Organisation and the Draft North West Marine Plan may be caught by the scope of NPPF19 §212 and as such a factual update as part of the partial review may be appropriate.</p>

Ref #	Consultee	Method	Date/Time Response Received	Summary of Key text from representation	Summary of Changes sought	Summary of Council Response
				<ul style="list-style-type: none"> • Ports, harbours and shipping • Employment • Tourism and recreation • Biodiversity • Marine Protected Areas • Seascape and landscape • Climate change • Heritage assets 		
15	Elizabeth Knowles Natural England	Email	23.03.2020 14:52	We agree with the proposed scope of the partial review of Wyre Local Plan to 2031 as detailed in the letter dated 28 February 2020. In addition, the Council should also review the Habitats Regulations Assessment and all other environmental reports/assessments associated with the local plan.	...the Council should also review the Habitats Regulations Assessment and all other environmental reports/assessments associated with the local plan.	The Council welcomes the agreement of Natural England to the scope of the partial review of the WLP31 and takes into consideration the need to review the Habitats Regulations Assessment and all other environmental reports and assessments.

Appendix B - Consultation Letter (Reg. 18), Wyre Council, February 2020

Ask for: ~~6222222222~~
Email: Planning.policy@wyre.gov.uk
Tel No: 01253 891000
Our Ref: PR Scoping

Date: 28 February 2020

Dear Sir/Madam,

Public Consultation. Regulation 18.

**The Town and Country Planning (Local Planning) (England) Regulations 2012 No 767
Part 6 (as amended)
Wyre Local Plan to 2031 Partial Review Scoping Consultation**

I am writing to advise you that the Council is consulting on the scope of the partial review of the Wyre Local Plan to 2031 for six weeks from 28 February 2020 to 5.00 pm on 14 April 2020.

The Council considers that it is necessary to undertake a partial review of the plan for two reasons:

- 1) The Wyre Local Plan to 2031 was adopted on 28 February 2019. It was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). A revised NPPF was published in February 2019, Annex 1: Implementation, Paragraph 212 states that Plans may need to be revised to reflect policy changes which the replacement framework has made. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan. Wyre Council is proposing to carry out a partial review.
- 2) The Wyre Local Plan to 2031 includes Policy LPR1 – Wyre Local Plan Review which requires the early partial review of the Wyre Local Plan with the objective of meeting the full objectively assessed housing needs over the plan period. The Policy sets out the matters to be included in the partial review including an update of objectively assessed needs and review of transport and highway issues.

The Council is writing to invite comments on the scope of the partial review. However it should be noted that revisions to allocations, for example, will not fall within the scope of this partial review and will not be taken forward.

This letter is available for inspection on the Council's website and at The Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU and at libraries throughout the Borough. Please visit www.lancashire.gov.uk/libraries for library locations and opening times.

Comments should be made in writing either by email to planning.policy@wyre.gov.uk or by post to Planning Policy, Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU, to be received by the deadline of 5.00 pm on 14 April 2020. **All comments will be published but apart from**

the name of the sender no other personal information will be publicly available. Anonymous comments will not be accepted.

You are receiving this letter because your contact details are held of our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters and/or the contact details are incorrect, please let us know either by phone 01253 891000 or email planning.policy@wyre.gov.uk

Yours faithfully,



Planning Policy Manager.

Appendix C – Consultee 1 (Duchy Homes)

~~CONFIDENTIAL~~

Subject: FW: Representations to the Wyre Local Plan to 2031 Partial Review Scoping Consultation
Attachments: Appendix 1 - Official Copy (Title Plan) - LAN138545.pdf; Appendix 2 - Wyre Council Local Plan Proposed Main Modifications Calder House Lane RM...pdf; Representations to Wyre Council OBO Duchy Homes.pdf

From: ~~CONFIDENTIAL~~ (Avison Young - UK) <~~CONFIDENTIAL~~@avisonyoung.com>
Sent: 14 April 2020 11:06
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: ~~CONFIDENTIAL~~ (Avison Young - UK) <~~CONFIDENTIAL~~@avisonyoung.com>
Subject: Representations to the Wyre Local Plan to 2031 Partial Review Scoping Consultation

Good morning,

Please find attached Representation to the Wyre Local Plan to 2031 Partial Review Scoping Consultation which have been submitted on behalf of Duchy Homes Ltd in relation Land at Calder House Lane (as shown on the enclosed plan).

I would be grateful if you could confirm safe receipt of these representations.

Kind regards,

~~CONFIDENTIAL~~

~~CONFIDENTIAL~~

Planner
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These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

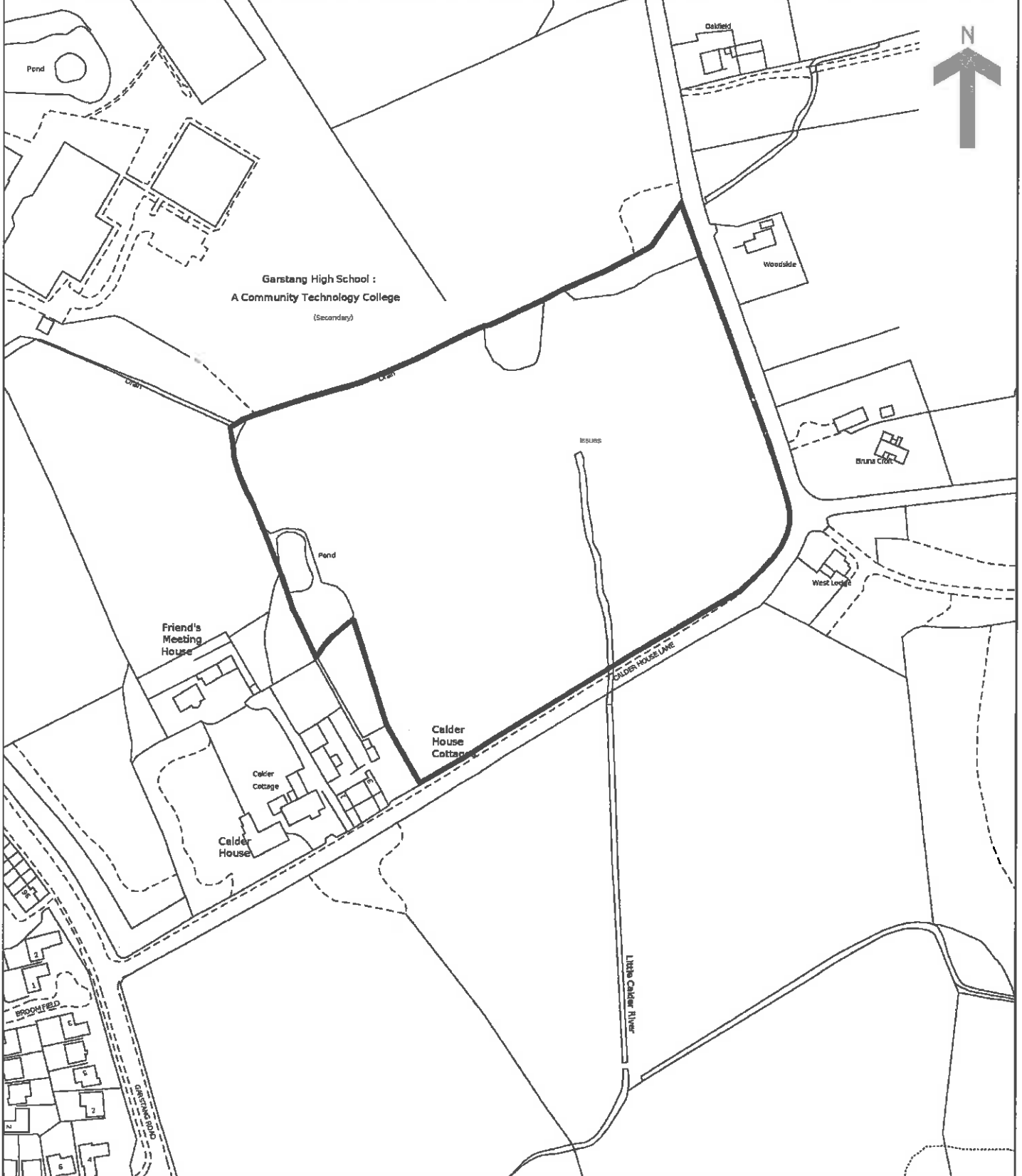
This official copy is issued on 13 March 2020 shows the state of this title plan on 13 March 2020 at 12:06:29. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by the HM Land Registry, Fylde Office .

HM Land Registry
Official copy of
title plan

Title number **LAN138545**
Ordnance Survey map reference **SD5043NW**
Scale **1:2500**
Administrative area **Lancashire : Wyre**



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Our Ref: 04C001029/RM/LF
Your Ref:

14 April 2020

Wyre Council,
Planning Policy
Civic Centre,
Breck Road,
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Norfolk House
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Dear Sir/Madam

Representations to the Wyre Local Plan to 2031 Partial Review Scoping Consultation

These representations are submitted by Avison Young on behalf of Duchy Homes Ltd ("Duchy Homes") to the consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 No 767 Part 6 (as amended) on the Scope of the Partial Review to the Wyre Local Plan to 2031.

The representations have been prepared and are made in the context of Duchy Homes' interest in land at Bowgreave, located within the administrative boundary of Wyre Council. A plan of the land in the interest of Duchy Homes is contained at **Appendix I**. Land at Calder House Lane has been previously promoted through the Local Plan process and the Promotional Document previously submitted by Savills on behalf of Carrick Sports Ltd is contained at **Appendix II**.

The remainder of this document provides Duchy Homes' comments on the proposed scope of the partial review.

Requirement for a Partial Review

Policy LPR1 (Wyre Local Plan Review) of the adopted Wyre Local Plan (2011 – 2031) states that the Local Planning Authority will bring forward a partial review of the Plan from the end of 2019 through to examination by early 2022. The policy states that the following specific matters are to be addressed by the review:

1. An update of Objectively Assessed Housing Needs;
2. A review of transport and highways issues;
3. Allocation of sites to meet the full Objectively Assessed Housing Needs, taking into account 2. above.

Notwithstanding the above, Wyre Council propose to undertake a partial review without considering revisions to allocations or the identification of new sites. Duchy Homes object to the removal of the consideration of

allocations from the scope of the partial review which is in clear contradiction to the policy that the Inspector required for the Plan to be deemed sound.

Undertaking an update of Objectively Assessed Needs is vital to ensure needs are fully met over the plan period. Should the Objectively Assessed Needs identified be higher than that met by the allocations in the adopted Local Plan, then allocations will logically therefore need to be reviewed. Removing the review of allocations from the scope of the review at this stage (i.e. before the updated OAN is known) is unjustified, and pre-judges the outcome of the update to the OAN.

National Planning Practice Guidance (NPPG)¹ states that Local Planning Authorities can consider a number of factors when determining whether a plan or policies within a plan should be updated, including:

- Changes to local circumstances such as a change in Local Housing Need;
- Their Housing Delivery Test performance; and
- Whether issues have arisen that may impact on the deliverability of key site allocations.

Duchy Homes' comments and observations on the above points and their relevance to the proposed scope of the partial review are set out below.

OAN and Housing Delivery Test

Policy SP1 (Development Strategy) and Policy HP1 (Housing Land Supply) commits the Local Planning Authority to delivering a net minimum requirement of 9,200 new market and affordable dwellings over a 20-year period (2011 – 2031), equating to 460 dwellings per annum.

It is noted that the figure of 460 dwellings proposed by the Council is higher than the local housing need figure of 297 dpa calculated using the 'Standard Method'.

However, Paragraph 2 of Planning Practice Guidance states that 'the standard method uses a formula to identify the minimum number of homes expected to be planned for'. Paragraph 10 advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates; including previous levels of delivery where this is significantly greater than the outcome of the Standard Method (which is 297dpa in Wyre).

With regard to the Council's previous annual completions, according to the Housing Delivery Test, Wyre Council are currently delivering completions at an average of 401dpa since 2014. Clearly this figure is well in excess of the OAN figure which if the Council were to adopt and the level of completions maintained, then the Council's supply would be exhausted far earlier than the 20-year plan period.

Moreover, given the consistent delivery of homes above 297dpa, it is clear that there is market demand in the area. To suppress this from the Local Plan target of 460 dpa to the OAN of 297 dpa would clearly be harmful as the OAN should be a minimum figure and not used to suppress growth. This approach would clearly be unsustainable and contrary to Local and National Policy.

On the basis of the above, the average delivery rate over previous years will need to be fully considered in any future housing target and cannot simply be based on the OAN as there are clearly circumstances present which require the actual housing figure to be higher than the standard method indicates. Our client strongly supports the sustainable growth of Wyre. Duchy Homes is fully supportive of the standard methodology but emphasises the outcome of the methodology should be read as a minimum figure. Our client would have no objection to the Local Plan Review identifying a more ambitious quanta of residential development to be delivered over the plan

¹ See 'Plan Making' Paragraph: 065, Reference ID: 61-065-20190723, Revision date: 23 07 2019

period, to ensure the plan is effective in delivering its overall economic, employment and housing growth objectives, and is positively prepared.

Deliverability of Key Site Allocations

Avison Young have undertaken an initial review of all allocations within the adopted Local Plan that propose 100 residential units or more. This review has raised a number of concerns around changes to the deliverability of the allocations since the adoption of the Local Plan, as summarised below.

Allocation SA1/2 – Whilst there are 157 dwellings (Phase 1) with detailed permission, further permissions have been relied upon when assessing the trajectory of delivery at the Local Plan stage and when assessing the site in the Five Year Housing Land Annual Position Statement (FYHLS APS, July 2019), which assumed the delivery of 288 dwellings within 5 years. Phase 2 of the development was refused in September 2019, appealed and subsequently dismissed on 12th March 2020. The appeal was dismissed on the basis of there being no agreed masterplan for the wider allocation, as required by the allocation policy. Whilst it is understood that work is ongoing, there is no timescale for a masterplan being agreed and therefore any further application for dwellings coming forward, whether it be in outline or detail. The refusal and dismissal of the appeal have occurred post the Local Plan's adoption, where the pending application was considered when deciding the allocation and trajectory was realistic. This casts doubt on the site yielding the original dwelling supply assumptions and therefore this allocation needs to be reconsidered and numbers reviewed accordingly.

Allocation SA1/3 – There is no masterplan in place (as required by policy), no developer on board and therefore no planning applications submitted for the site. There is no firm evidence and it is doubtful that the allocation can deliver houses from 2021 onwards as envisaged at the time of adoption. Indeed, the Inspector's Report (January 2020) for the FYHLS APS confirms that 35 houses should be removed from the FYHLS on this basis. This allocation needs to be reconsidered and numbers reviewed accordingly.

Allocation SA1/4 – The trajectory assumed during the Local Plan process suggested that the delivery on this site would commence from 2022/23. There are no detailed planning permissions in place at the time of writing, and it is noted that a viability issue has only just been resolved on part of the site (the appeal for application reference 18/00680/OULMAJ (refusal) was allowed on 1st April 2020). In light of this, the Inspector's Report on the FYHLS APS casts doubt on 68 dwellings in total on the site coming forward within 5 years and it requests these are removed. Duchy Homes agree with this caution and therefore request the allocation is reconsidered and numbers reviewed accordingly.

Allocation SA3/1 – The trajectory assumed at the Local Plan stage assumed the delivery of 120 dwellings within the plan period, with 40 of those in 5 years from adoption. The FYHLS APS in line with the Inspector's Report, pushes this back to have no completions in the first five years. There is no masterplan in place and no firm thoughts² on how to develop the site, which puts the 120 dwellings into doubt as a whole. The site is not coming forward as anticipated at the Local Plan examination stage and therefore the delivery of dwellings within this mixed-use allocation needs to be reviewed.

Site SA1/14 -This site is slated in the Local Plan for delivering 260 units across the Plan period. To date, an application (Ref. 20/00148/FULMAJ) has been made by a national developer and is pending consideration to deliver 88 units on part of the site which they have an option on. However, Table 3 (Allocations with no planning permission) of Wyre Local Plan's FYHLS APS confirms that this site is controlled by multiple landowners and two landowners have withdrawn from this allocation. This withdrawal of these landowners since the Local Plan was adopted will clearly affect the quantum of development that can realistically be delivered on this site and therefore this allocation will need to be reconsidered and numbers reviewed accordingly.

² As confirmed by the Inspector in his report on the FYHLS APS

Site SA3/4 - This site is slated in the Local Plan for delivering 310 units across the Plan period. Part of the site has been the subject of an outline planning application (Ref. 18/00469/OUTMAJ) for 210 dwellings since May 2018 which has been promoted by Hollins Strategic Land. Whilst there is currently no consent in place, Table 3 (Allocations with no planning permission) of the FYHLS APS states that it is Hollins Strategic Land intention is to sell the site once permission is secured. However, there is no evidence of buyer interest which casts uncertainty the timescales and quantum of development ultimately being delivered at the reserved matters stage.

It is also understood that work is ongoing with the masterplan to deliver the allocation but there are multiple landowners and stakeholders involved and there are no known timescales for this to be agreed, and thus timescales for an application for the remaining 100 units to come forward. Numbers will clearly need to be reviewed on this allocation in light of the circumstances set out above.

In summary, it is clear that circumstances around the delivery of some of the allocations have altered since the adoption of the Local Plan, and therefore these need to be fully reviewed and any shortfall in supply needs to be rapidly addressed in order to ensure a sufficient number of dwellings come forward in the plan period to meet the identified need.

Land at Calder House Lane

As part of the review of allocations, there is a need for the Council to consider further/additional site allocations that could meet the additional/unmet need. Duchy Homes Ltd wish to promote their Land at Calder House Lane, Bowgreave, as an additional site for development. We note that the site has previously been submitted to the Council and as such this part of the representations should be read in conjunction with Savills' submissions during the Local Plan process.

Site Description

The site as shown at **Appendix 1** extends to approximately 3.4ha and comprises greenfield agricultural land. It is located immediately adjacent to existing residential development west on Calder House Lane and north/east on Dimples Lane and Bruna Lane. Garstang Community Academy and associated sports facilities are located to the immediate north of the site. Agricultural fields extend to the south, beyond Calder House Lane. The site is in Flood Zone 1 and there are no technical constraints that would impede the development of the site.

A Suitable Site

The land is very well located in terms of connectivity. The village of Bowgreave and its facilities are within 200m and is therefore easily accessible by walking via the footpaths to the south and east of the site. The amenities within the town of Garstang and villages of Catterall and Bonds are also a short distance away. A number of bus stops are located on Garstang Road, 350m east of the site, which accommodate services to Preston City Centre, Blackpool Town Centre and Lancaster, providing access to many employment opportunities and further amenities. The site is located in close proximity to the A6 corridor to the west. In summary, the site is very well located in relation to the existing settlement and is in close proximity to both public and private transport links.

The recently published Wyre Settlement Study places Bowgreave 12th out of 28 in the rank of borough settlements and 4th in the rank of settlements along this A6 corridor. As this ranking is based on considerations of size, accessibility, services, facilities and employment opportunities, it is considered to be a valid indication of sustainability. Indeed, a number of other residential applications³ in Bowgreave have been permitted in recent years taking into account (amongst other considerations) that the settlement is sustainable.

³ See 15/00891/OUTMAJ, 15/00420/OUTMAJ, 15/00928/OUTMAJ

Given the site's surroundings and sustainability credentials, it is ideally suited to residential uses. Indeed, a pre-application meeting was undertaken in April 2016 (ref: 15/00158/PREAPP – see Appendix 3 of **Appendix 2**) whereby the Council confirmed that the principle of residential development on this site would be acceptable. Duchy Homes wish to work with Wyre Council to develop an appropriate residential proposal for the site that reflects the identified needs emerging from the evidence base.

An Indicative Layout is presented in the appended Promotional Document (See Appendix 2 of **Appendix 2**) which demonstrates that a total of 86 dwellings can be accommodated on the site whilst still incorporating an acre of Public Open Space.

Land at Calder House Lane was assessed in the Strategic Housing Land Availability Assessment (SHLAA, 2017) with reference BOW_11 informed by this capacity. An extract of the assessment is set out in the table below.

Table 1: SHLAA Extract

SHLAA Ref	Site name	Location	Size (ha)	NDA (ha)	Cap.	Land type	FZ	SFRA cat.	Exclusion reason
BOW_11	Calder House Lane	Bowgreave	3.56	2.85	86	GF	1	A	In a detached or isolated location.

Whilst the site was considered for allocation, by virtue of its assessment and confirmed in the pre-application response, the site was ultimately 'sieved out' due to the conclusion reached that it is in 'a detached or isolated location'. The SHLAA states at page 11:

"Whether or not a site is so detached or isolated as to require exclusion from further assessment is a matter of planning judgement. In applying this principle regard has been had to defined settlement boundaries in the 1999 Local Plan and the emerging settlement boundaries for the new Wyre Local Plan where these are different. It is noted that at the time of writing the new Local Plan will increase the number of settlements with defined boundaries and this has been taken into account in applying this principle. The identification of a settlement is based on the Wyre Settlement Study, August 2016."

As mentioned above, the site is immediately adjacent to existing residential development and community facilities and Duchy Homes therefore disagree that it is detached or isolated. The adopted Policies Map shows the settlement boundary for Bowgreave (at **Figure 1** below), and when compared with the site's boundary, it is clear that the site is not in a detached or isolated location. A footpath connects the site to the settlement to the east, and there is scope for this to be improved and other measures as part of the allocation/application process⁴.

Figure 1: Policies Map extract (Settlement boundary in black, Land at Calder House Lane outlined in red)

⁴ In line with Paragraph 103 of the NPPF which states "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or **can be made sustainable**, through limiting the need to travel and offering a genuine choice of transport modes."



In addition, the allocation of Land South of Calder House Lane, Bowgreave (ref: SA1/19), immediately south of the site, was deemed acceptable by the Local Plan Inspector and the development of this land will further enclose the site. It is therefore considered that Land at Calder House Lane should be reassessed in this respect.

In summary, the site is within a settlement deemed as sustainable by the Council in committee reports, in a location deemed acceptable by the Local Plan Inspector (by virtue of the allocation of SA1/19) and is not detached or isolated. The site has no known technical constraints that would impede development and it has been demonstrated that 86 dwellings can be accommodated on the site. The site is therefore suitable for development.

An Available Site

There are no legal or ownership constraints on the site that might prohibit or delay development of the site, or any current uses which would need to be relocated. The site is in single ownership and the landowners are willing to release the site for development.

The site is therefore available for accommodating development now, and it is not dependent on any external factors.

An Achievable Site

The site has no known issues or constraints that would prevent it from being developed in a viable manner, once allocated for development. The development of the site would clearly be achievable.

Summary

Duchy Homes' key objective is to ensure the full potential of their land is recognised and they are committed to strongly promoting the Land at Calder House Lane. The site's logical and sustainable location coupled with its complete control by a single owner offers potential opportunities to deliver additional benefits to the local area and region.

Conclusions

To conclude, the scope of the partial review of the Local Plan is not considered to be sufficient to ensure housing needs are met for the entirety of the plan period. There is a need for the Council to review and consider further/additional site allocations within the Local Plan, dependent on the review of Objectively Assessed Needs and the progress of developments on allocated sites. A review of allocations should be part of the scope for the partial review as required by Policy LPR1 of the Local Plan and NPPG. The trend/evidence base demonstrates consistent delivery of 400+ units per annum in recent years which must be factored into the overall assessment exercise and points to the need to ensure a sufficient forward-facing supply of residential allocations. To adopt a restrictive or suppressive approach will only result in unnecessary pressure on land outside settlement limits in years

to come and will render the current plan review ineffective and inconsistent with national policy requirements.

It is requested that Land at Calder House Lane is included as an allocation, as a site that can help deliver the much needed new homes that are now uncertain to be delivered within the plan period from the existing allocations as evidence above. The site represents a logical and sustainable extension to Bowgreave and is a suitable, available and achievable site for housing development.

Duchy Homes look forward to a positive, collaborative and effective working relationship with Wyre Council and other key stakeholders as the review of the Local Plan moves forward.

Yours sincerely



Senior Planner

0161 956 4075

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For and on behalf of Avison Young (UK) Limited

Land at Calder House Lane, Bowgreave

Representations to Proposed Main Modifications
to the Wyre Local Plan

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1. Introduction

- 1.1. This representation is prepared on behalf of our client Carrick Sports Ltd, who are the freehold owners of land at Calder House Lane, Bowgreave. The land is identified on the site location plan (Appendix 1) and deliverability demonstrated on the enclosed illustrative layout (Appendix 2).

This representation is prepared to specifically analyse the 'Soundness' of the Wyre Local Plan Main Modifications document which was issued in order to make the Publication Draft Wyre Local Plan 'sound' based on the Inspector's recommendations, post examination. With the consultation running from 12th September to 24th October 2018.

- 1.2. Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- a) **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it's practical to do so and is consistent with achieving sustainable development.
 - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

¹ Where this relates to housing, such needs should be assessed using a clear and justified method, as set out in paragraph 60 of this Framework.

- 1.3. In 2015, representations were submitted on behalf of our client and this site in order for the site to be considered as a housing allocation within the emerging Wyre Council Local Plan, under the call for sites consultation exercise.
- 1.4. At the time of the submission, no technical work had been progressed with the site, but it was considered that the whole parcel was available and capable of delivering development now in principle.
- 1.5. We have not previously submitted representations to Wyre's Local Plan, this was due to the ongoing status of our application, yet in light of Wyre's revised housing figures and in line with NPPF paragraphs 11 and 35, we are compelled, in the spirit of effective, positive and justified plan making, to explore these figures and make a number of recommendations to help make the any modifications to the Local Plan 'Sound'.

2. Background and Site Deliverability

Site

- 2.1 The site totals circa 3.4 hectares (ha) and is located on land off Calder House Lane, Bowgreave, PR3 1ZE (Grid Reference E:350030 N:443836). The site is located circa 200m to the east of the village of Bowgreave and approximately 14km to the north of Preston.
- 2.2 The site itself is a broadly rectangular edge of settlement greenfield site consisting of agricultural land. Adjacent to the site lies Dimples Lane to the east and Calder House Lane to the south. The site topography is generally flat, with a slight fall from the north east corner of the site.
- 2.3 Access to the site can be taken from Calder House Lane. There is no public access across the site, with the nearest public right of way situated off Dimples Lane. The junction with Garstang Road is covered by an existing 30mph speed limit. Garstang Road (B6430) runs approximately north-south from Catterall to the south through Bowgreave and onto Garstang to the north. The M6 motorway runs north-south in parallel, approximately 1km to the east of the site.

Sustainability

- 2.4 The site is sustainably located in close proximity to the A6 corridor to the west, with the nearest bus stops being located on Garstang Road circa 350m west of the site with half hourly services to Lancaster, Preston and Blackpool.
- 2.5 Local Plan Policy SP1- Development Strategy outlines how the overall planning strategy for the Borough will be one of growth within environmental limits. The spatial approach of the Local Plan is one of sustainable extensions to the towns and rural settlements in accordance with the Boroughs settlement hierarchy within which Bowgreave is defined as a “main rural settlement” to accommodate 1,684 units or 19.5% of the housing requirement over the plan period 2011 to 2031.
- 2.6 Within the Inspector’s response it was written for example:

“Moreover, the need to focus significant development in locations that can be made sustainable and where the use of sustainable transport modes can be maximised is in my view not given sufficient weight in the analysis and highway caps. For example along the A6 corridor affected by the Severe Restriction Zone (n1) there are existing and proposed employment opportunities, a range of services and facilities, particularly in Garstang, and the opportunity to use and build upon sustainable modes of travel.” (Our emphasis, Para 9)²

² Document EL6.003a Inspector’s Post Hearing comments 3rd July 2018.

Background – Deliverability and Developability

- 2.7 This representation does not deal with detailed matters able to be viewed as part of application reference 18/00632/OUTMAJ, yet we would reinforce and reference the strong sustainability, developability and deliverability credentials of the site, which were received and supported both through the pre-application commentary (reference 15/00158PREAPP) received from the council (Appendix 3).
- 2.8 For a site to be considered deliverable³, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years
- 2.9 In addition; for a site to be considered developable⁴, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
- 2.10 To test the deliverability and developability a pre-application request was submitted and formal response returned from the council in February 2016. Prior to the submission of this planning application an exchange of telephone calls was also made between Savills and ██████████ at Wyre Council during April 2018 to confirm the content of the proposed application and suite of documents submitted for consideration.
- 2.11 From this, it became clear that the site is a deliverable and developable site as referenced and confirmed through the positive pre-application feedback in 2016 (Appendix 1). In summary, advice was sought for the proposed development of up to 100 units. The proposed development was considered to be a sustainable proposal which the Council could support subject to resolution of the strategic highways constraints.
- 2.12 The site specific technical constraints were not considered to be insurmountable and the proposal falls within Flood Zone 1. At the time of submission, the Council acknowledged they could not demonstrate a five year supply of housing land.
- 2.13 Further to this, at the time of the pre application consultation the Council were considering including the site as part of their site allocations, which was proposed in the SHLAA 2017 report (under reference Bow_11). Ultimately, it was considered to be a suitable and achievable site.

³ NPPF 2018, Annex 2: Glossary

⁴ NPPF 2018, Annex 2: Glossary

3. Proposed Main Modifications Commentary

- 3.1 There are two main points we wish to raise with our representations in the interests of helping Wyre realise a sound local plan.
- 3.2 Firstly, there should be a correction of the housing figures expressed principally through MM/003-005, MM/021-23 and MM/048. There is an incorrect housing demand (Objectively Assessed Housing Need [OAHN]) figure, an incorrect supply figure and an incorrect calculation regarding how the Local Plan now meets 97% of the OAHN.
- 3.3 Second, we wish to note our support for the inclusion of Draft Policy LPR 1 and all of its references as directly expressed through MM/089-090.

MM/003-5, MM/021-23 and MM/048 – Incorrect Housing Figures

The Correct Objectively Assessed Housing Need

- 3.4 During Examination it was considered that Wyre had not put forward a Local Plan which had been positively prepared. Here the Council's evidence base identified an OAHN of **9,580** dwellings over the plan period (479 dwellings per annum [dpa]). This was the position as of 13th July 2018⁵.
- 3.5 The Proposed Main Modifications now suggests that the OAHN is to be dropped to **9,285**⁶, equating to 464 dpa. With this new OAHN Wyre are now suggesting 97% of their OAHN requirement can be met.
- 3.6 The rationale for Wyre selecting 464 dpa is unclear. The only inference being that this figure is included purely due to it matching the council's new supply figure of 9,285⁷, having found an additional land supply of 1,060 dwellings since the close of the hearings.
- 3.7 Land supply issues aside, which are dealt with next, the 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and in any event shows that Wyre are not planning positively in avoiding the higher figure in the range. Indeed within the Housing Background Paper (updated January 2018) it was written by Turley and highlighted in the SHMA that addressing the demographic, market signals and economic evidence would result in a minimum OAN of 457 dwellings per annum⁸.

⁵ Document EL6.003a Post Hearings Advice Inspector dated 5th July 2018

⁶ Document EL7.001a Proposed Main Modifications Paragraph 4.1.11

⁷ Paragraph 16 (red text) Document EL6.003b Post Hearings Advice Council Response dated 30th July 2018

⁸ Submission Document ED010 page 21 updated January 2018.

3.8 There is an implication that the new OAHN seems reactive and there is a danger that if this new OAHN is adopted it runs the risk of the Local Plan being found unsound due to insufficient justification and in the interests of positive planning.

3.9 Our recommendation is therefore as follows:

Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.

Housing supply

3.10 The Inspector noted deliverable sites totalling 8,224/5 in the plan period. Yet, within the Council’s response it was stated that an additional 1,060 dwellings has been found equating to an overall delivery of 9,285.9

3.11 Set alongside the Local Plan’s previous table. Table 1 of the council’s response sets this new supply out as follows. Please note this includes a Savills Assessment with the detailed trajectory set out at Appendix 4.

	Number of dwellings delivered within plan period (2011-2031) Turley Housing Delivery¹⁰ (Inspector’s agreed position)	Number of dwellings delivered within plan period (2011-2031) Post Hearing position (Wyre’s Assessment)	Number of dwellings delivered within plan period (2011-2031) Post Hearing Assessment (Savills Evaluation)
<i>Completions 1 April 2011- 31 March 2018</i>	1646	2041	2041
<i>Large sites w/ Planning</i>	1212	1056	1056
<i>Allocated sites w/ Planning</i>	2545	2903	2903
<i>Allocated sites without Planning</i>	2482	2359	1971
<i>Small sites w/ planning (discounted 10%)</i>	340	426	426
<i>Windfall allowance</i>	0	500	0
Total	8,225	9285	8397

Table 1 – edited from council’s response documents EL6.003c and Appendix 2 of the Submission Housing Background Paper ED010

⁹ Document EL6.003b Post Hearings Advice Council Response dated 30th July 2018

¹⁰ Table 16 submission Document ED010 updated January 2018

- 3.12 There are two issues here which should be corrected. Firstly, site allocation delivery within the plan period utilising unrealistic build out rates and undevelopable sites and secondly the inclusion of a 500 dwellings windfall allowance.

Site Allocations without planning permission – delivery assumptions

- 3.13 As set out at Appendix 4 there are unrealistic assumptions being made about completions rates and overall site deliverability on the following sites: SA3/1, SA3/4, SA3/3, SA1/5, SA1/3, SA1/16 and SA4. Our rationale is set out within the commentary section of this table.

- 3.14 Our analysis of these key allocations without planning permission shows that many of the sites have too ambitious assumptions over build out rates and lead in periods and there are inclusions of sites where there is no realistic prospect of coming forward within the plan period. We have also updated the table to account for permissions involving these allocations since the January 2018 paper and the extended allocation of SA1/16.

- 3.15 With this evidence we therefore believe a realistic housing supply figure for these allocations is 1,066 dwellings over the plan period against Turley’s comparative figure of 1,577. This equates to a total delivery of 1971 dwellings within allocated sites without planning permission against Wyre’s new figure of 2359.

Windfall Allowance

- 3.16 The matter of including windfalls is in danger of being considered to double count the small sites with planning permission allowance. This double counting was written about and advised against earlier this year within the Turley Housing Background Paper (January 2018):

“In the past the Council adopted a small sites allowance ... This allowance covered small sites which currently had permission and an element of small sites windfalls that were anticipated to arise in the latter part of the five year period.” (Our emphasis, para 7.19).

- 3.17 It goes on to state that whilst the small sites allowance was for 100 dwellings pa the allowance was based on annual average completion rates and within the new trajectory:

“The Council considers it unlikely that windfall delivery will continue in the same manner as has been experienced in the past, primarily due to the significant highways constraints. A windfall allowance was considered but even a small allowance per year results in a large contribution over the Plan period.” (Our emphasis, para 7.21)

3.18 Therefore no windfall allowance was included within the Local Plan and to include now appears odd. It is unclear why the position has now changed, other than to retrospectively boost the supply. In absence of an evidence base explaining why windfalls are suddenly now appropriate a windfall allowance of 500 units should not be counted in the interests of justified and effective plan making.

Recommendation 2: that the supply figure be corrected to 8,397 dwellings over the plan period in the interests of justified and effective plan making.

Recommendation 3: that the percentage of meeting the OAN be reinstated to 87% over the plan period in the interests of justified, positive and effective plan making.

MM/089-90 – Local Plan Review 1

- 3.19 For the avoidance of doubt we support the inclusion of Local Plan Review Policy 1. We are promoting the land at Calder House Lane as an alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.
- 3.20 As explored through the earlier sections of this documents it offers an easily identifiable, deliverable and sustainable solution to help meet the OAHN shortfall in direct accordance with the Inspector's post hearing advice (document reference EL6.003a) in terms of locating new development sustainably on the A6 corridor.
- 3.21 Within this document it was mentioned at paragraph 9 that there is a local need to focus significant development in locations that can be made sustainable and where the use of sustainable transport modes can be maximised. He mentions the A6 corridor and in particular Garstang, which has a range of facilities and infrastructure and as such is a sustainable location for growth. Here he questions whether enough emphasis on sustainably located sites where the use of sustainable transport modes can be maximised in analysing congestion and highway impacts.
- 3.22 As demonstrated through our application the site is clearly a deliverable and developable site and we look forward to discussing the site further with the council at the point of local plan review.

Revisions to the OAHN in light of the Standardised Methodology

- 3.23 No change is recommended to the policy wording, however we would make the point that caution should be exercised with the publication of the Revised NPPF in July 2018. Within this the New Standardised Methodology figures are due in November 2018, thereby replacing the OAHN required since 2012 and moving to the new system of Local Housing Needs Assessments. Yet the figures only apply to Local Plans submitted prior to the 24th January 2019 (paragraph 214).
- 3.24 We therefore feel it is important to address a revised OAHN in light of the Standardised Housing Methodology which is due to come into force. Indeed some council's such as Wyre have automatically taken the figures and included them within housing land supply updates as demonstrated through Wyre's Housing Land Supply Position Statement dated 20th Sept 2018. This now suggests a housing need of 281 dwellings per annum or 5,620. This is some 59% of the correct OAHN set out within the Local Plan.

- 3.25 Within the Council's response on the matter it was made clear that the Local Plan process should not be halted to take account of these revised figures, the implications are 'minor' and as such it does not warrant a review of the current strategy¹¹, including the Local Plan Review Mechanism.
- 3.26 We would echo this sentiment and highlight that ~~Conservative~~ MP, Minister for Housing has specified that the revised housing targets are "very weird" and the Government are undertaking urgent work to look at the issues and to create further guidance. As a result of slower than expected population growth as a result of the past recession, this impacted and reduced the sub-national housing figures, but asks that just because of the population uncertainty local councils should not 'take their foot off the pedal.'¹²
- 3.27 Despite the council looking to perform in its duty in meeting a five year housing land supply through the 20th September 2018 Housing Supply Statement adoption of a lower target is premature. There is every chance figures will be revised upwards with currently 2016 ONS falling some 40% short of national commitment to delivery 300,000 dwellings per annum and the council should not look to evade responsibility when it comes to the review in meeting the correct OAHN figure in 2019.

¹¹ Document EL6.004b – Council response to latest household projections.

¹² Conservation Party Conference 1st October 2018

4. Summary

- 4.1. In summary we make the following recommendations in respect of the Proposed Main Modifications, applicable to the following references MM/003-5, MM/021-23 and MM/048:

*Recommendation 1: that the OAHN be reinstated to **9,580** dwellings over the plan period in the interests of justified and positive plan making.*

*Recommendation 2: that the supply figure be corrected to **8,397** dwellings over the plan period in the interests of justified and effective plan making.*

*Recommendation 3: that the percentage of meeting the OAN be reinstated to **87%** over the plan period in the interests of justified, positive and effective plan making.*

- 4.2. We also wish to record our support for the Local Plan Review mechanisms outlined by draft policy LPR 1 and the provision contained within MM/089 and MM/090.
- 4.3. In stating this support we wish to promote our site as a means to help meet the OAHN shortfall, representing a deliverable and developable site currently being demonstrated through application reference 18/00632/OUTMAJ and as set out within the Inspector's Post Hearing response, contributing to sustainable development along the A6 corridor.

Appendix 1



KEY



Site Location

Land at Calder House Lane, Bowgreave

on behalf of Garstang Golf Club

Note:- Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office Crown copyright licence number 100024244 Savills (UK) Limited. Published for the purposes of identification only and although believed to be correct accuracy is not guaranteed. Contains Google Maps information © Google Maps and database right.



drawing no. SK01
rev -
scale 1:1,250 @ A3
drawn by RM
checked by

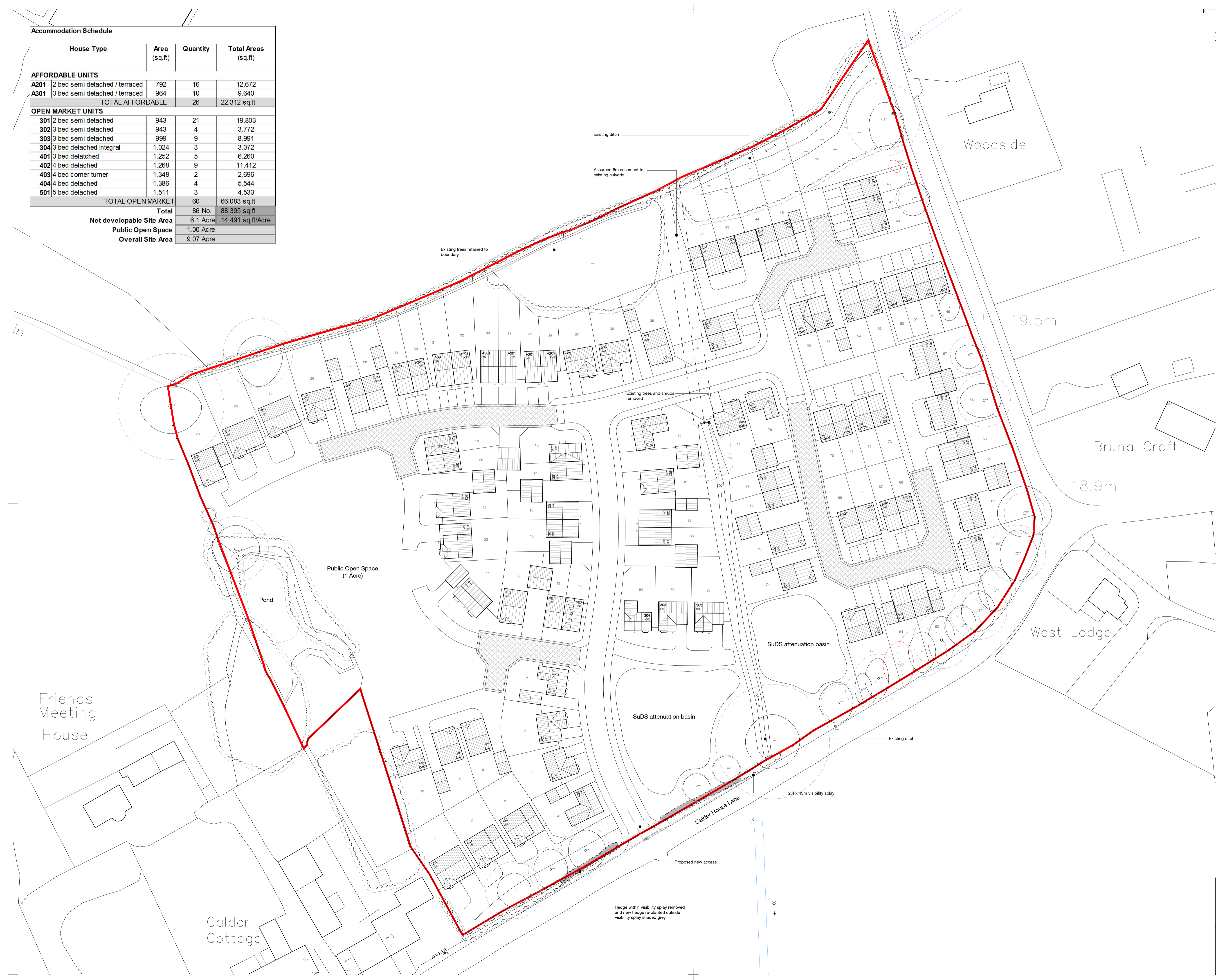
drawing Site location
job no.
date 16 December 2015



Appendix 2

Accommodation Schedule			
House Type	Area (sq.ft)	Quantity	Total Areas (sq.ft)
AFFORDABLE UNITS			
A201 2 bed semi detached / terraced	792	16	12,672
A301 3 bed semi detached / terraced	964	10	9,640
TOTAL AFFORDABLE		26	22,312 sq.ft
OPEN MARKET UNITS			
301 2 bed semi detached	943	21	19,803
302 3 bed semi detached	943	4	3,772
303 3 bed semi detached	999	9	8,991
304 3 bed detached integral	1,024	3	3,072
401 3 bed detached	1,252	5	6,260
402 4 bed detached	1,268	9	11,412
403 4 bed corner turner	1,348	2	2,696
404 4 bed detached	1,386	4	5,544
501 5 bed detached	1,511	3	4,533
TOTAL OPEN MARKET	60		66,083 sq.ft
Total	86 No.		88,395 sq.ft
Net developable Site Area	6.1 Acre		14,491 sq.ft/Acre
Public Open Space	1.00 Acre		
Overall Site Area	9.07 Acre		

Notes | Sketch schemes may be based on plan information of unknown origin and is subject to verification and survey. Contractors must verify all dimensions on site before commencing any work or shop drawings. This drawing is not to be scaled. Use figured dimensions only. Ensure digital versions are printed at 'Actual Size'. Building areas are liable to adjustment over the course of the design process due to ongoing construction detailing developments. Subject to statutory approvals and survey. The bar above is to check that the drawing has been printed to scale.



Rev	Date	Description	Drawn	Checked
C	12.06.18	Annotation amended	CR	GE
B	11.06.18	Attenuation ponds added, tree survey shown	CR	GE
A		Layout revised accordingly	CR	GE
Project: Calder House Lane				
Drawing: Bowgreave				
Client: Savills				
Project Subtitle Description: SUITABLE FOR INFORMATION EIM Subtitle Code: S2				
Status	Preliminary			
Date	05.04.18	2 Riverside Way	325 City Road	London EC2R 2TE
Drawn	CR	LEEDS	LONDON	
Checked	GE	1 013 818 8041	1 0203 803 8002	
Scale (A1)	1:500	www.edwardarchitecture.co.uk		
0682 - EA - A - S001 - C				
				edward architecture

Appendix 3

Pre-Application Delegated Report Sheet

Application Number: 15/00158/PREAPP

Proposal: Pre-application meeting for proposed residential development.

Location: Land At Calder House Lane And
Dimples Lane
Bowgreave
Lancashire

Applicant: Carrick Sports Ltd

Correspondence Address: ~~0113 2700000~~
Savills UK Ltd
29 King St
Leeds
LS1 2HL

Case Officer's Report:

Meeting Date: 11th February 2016

Proposal: advice is sought on a residential development of up to 100 houses on land at Dimples Lane and Calder House Lane in Bowgreave.

1.0 RELEVANT PLANNING HISTORY

1.1 No relevant planning history is identified on the site. It is acknowledged that proposals for other residential schemes are pending determination within Bowgreave and the wider area.

2.0 RELEVANT PLANNING POLICIES

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

2.1 The Framework sets out a presumption in favour of sustainable development (para 14). Sustainability comprises economic, social and environmental dimensions and the planning system is intended to play an active role in the delivery of sustainable development. Local needs and circumstances must be taken into account. Development proposals that accord with the development plan should be approved without delay. Proposals for sustainable development should be supported where possible.

2.2 Twelve core planning principles are identified. These include supporting sustainable economic development to meet local need whilst securing high quality design and a good standard of amenity. The different roles and characters of different areas must be considered and the natural environment should be conserved and enhanced. Full account of flood risk must be taken. Heritage assets must be conserved in a manner appropriate to their significance. The effective use of land is encouraged and patterns of growth must be actively managed to make fullest use of sustainable transport modes.

2.3 Sections 4, 6, 8, 10, 11 and 12 are relevant.

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG):

2.4 The NPPG includes the following sections which are of relevance:

- Conserving the historic environment
- Flood risk and coastal change
- Health and well-being
- Land contamination
- Minerals
- Natural environment
- Planning obligations
- Rural housing
- Transport evidence bases in plan-making and decision-taking
- Travel plans, transport assessments and statements in decision-taking

ADOPTED WYRE BOROUGH LOCAL PLAN (SAVED POLICIES):

2.5 The following policies are of most relevance:

- SP2 - Strategic location for development
- SP13 - Development in the countryside
- SP14 - Standards of design and amenity
- ENV7 - Trees on development sites
- ENV15 - Surface water run-off
- H13 - Open space in new housing developments
- CIS6 - Securing adequate servicing and infrastructure

SUPPLEMENTARY PLANNING DOCUMENT:

2.6 SPG 2 - Trees on development sites

2.7 SPG 4 - Spacing in new housing developments.

EMERGING LOCAL PLAN:

2.8 The following policies are of most relevance:

- CS1 - Spatial strategy for Wyre: distribution of development
- CS2 - Spatial strategy for Wyre: settlement and centre hierarchy
- CS9 - Strategy for Garstang and Catterall
- CS13 - Sustainable development
- CS14 - Quality of design
- CS16 - Transport, accessibility and movement
- CS17 - Infrastructure and community facilities
- CS18 - Green infrastructure
- CS19 - Biodiversity and geodiversity
- CS20 - Housing mix
- CS21 - Affordable housing
- CS24 - The countryside
- CS25 - Flood risk and water resources
- CS28 - The historic environment

3.0 RELEVANT SITE CONSTRAINTS

3.1 Part of the site falls within a Minerals Safeguarding Area. There is a pond, hedgerows and trees on site and the Little River Calder originates above ground on the site. There is also a Listed Building in close proximity.

4.0 PLANNING ISSUES

4.1 The main issues for consideration would be:

- The acceptability of residential development in principle
- Planning obligations
- Housing mix and density
- Residential amenity
- Visual impact
- Ecological and arboricultural impact
- Drainage and flood risk
- Parking and highway safety
- Sustainability considerations

Acceptability of residential development in principle

4.2 The site falls within designated countryside. Policy SP13 aims to protect the intrinsic rural character and appearance of the countryside by restricting new development. Whilst the more recently published National Planning Policy Framework recognises the need to protect the inherent qualities of the countryside, it also expects decision-makers to be proactive in supporting development to deliver the homes, jobs and infrastructure that local communities need. In this way the NPPF carries more weight than the local plan policy and is supportive of development that can be demonstrated to be sustainable. At present the Council is unable to demonstrate a five year supply of housing land and is considering the inclusion of the site as a potential allocation for future housing development as part of the emerging Local Plan. On this basis residential development on the site is considered to be acceptable in principle. It is understood that you would seek to make an application in outline form with only the matter of access for detailed agreement. This approach is considered to be appropriate.

Planning obligations

4.2 Affordable housing provision equivalent to 30% of the residential development proposed would be required. This provision should be made on-site. Please note that the Council is currently undertaking a rural housing needs survey that is due to be published this spring. This may indicate a different requirement for affordable housing provision than at present and so you are advised to contact the Council for further guidance should your submission be after this time.

4.3 A scheme of the size proposed would have the potential to require a contribution towards local education provision. As explained in our meeting, Lancashire County Council as Local Education Authority is unable to participate in pre-application discussions. Any necessary contribution would, however, be calculated in accordance with the County Council's published Education Contribution Methodology which can be found here <http://www.lancashire.gov.uk/council/planning/planning-obligations-for-developers/education-contributions-guidance.aspx>.

4.4 Policy H13 of the adopted Local Plan relates to the provision of public open space as part of new housing developments. A scheme of the size proposed would generate a minimum requirement of 0.004ha per dwelling and this should be provided on-site. As discussed, the provision of play equipment as part of the open space would be desirable but is not a planning policy requirement.

Housing mix and density

4.5 It is recognised that you are only seeking general advice at this time and have not drawn up any kind of indicative site plan. However, in your letter you make reference to the provision of between 90 and 100 new homes. This would equate to a gross housing density of 26.5-29.5 dwellings per hectare. Given the existing ecological features on site and the need to retain these elements, it is considered that this number of properties would give rise to a net housing density that would be excessive and out-of-keeping with the character of Bowgreave. A less intensive scheme would be more appropriate and it is recommended that the density of development be reduced as you move away from the main body of Bowgreave towards Dimples Lane. A density of between 20-25dph would be considered more appropriate.

Residential amenity

4.6 Although not a matter for consideration at this stage, your attention is drawn to the Council's adopted guidance on spacing in new residential developments. This is set out in Supplementary Planning Guidance Note 4 which is available to view on the Council website. It specifies that, for two-storey development, front/rear-to-front/rear separation distances of a minimum of 21m are required with a separation of a minimum of 13m needed between front/rear and side elevations. A minimum of 1m should be provided between the side elevation of a property and its boundary.

Visual impact

4.7 The site is currently open countryside, and there is a public right of way to the north-east. Bowgreave is a small settlement with a predominantly linear character focussed on the B6430. The proposal would be of significant scale and would represent a clear and notable incursion into the open countryside. Visual impact would therefore be a key consideration. A basic landscape and visual assessment should also be provided and this should explain how the site would be screened and how visual impact would be mitigated. Photomontages from key vantage points would be useful. It would be expected that as much of the existing landscaping be retained as possible in order to minimise the visual impact of development.

Heritage impact

4.8 The Bowgreave Friends Meeting House is a Grade II Listed Building to the south-west of the site. It is acknowledged that this is currently well screened from the site but a Heritage Statement would nevertheless be needed in support of any application.

Ecological and arboricultural impact

4.9 As discussed in our meeting, there is a pond within the copse of trees to the west of the site and the Little Calder River originates at ground level at the centre of the site. The land is bounded by hedgerows that appear on the 1845 historic maps and there are a number of trees on site. In particular, those trees along Calder House Lane are of veteran status and therefore of particular arboricultural value. Given the presence of these features, any application would need to be supported by a phase 1 ecological

assessment, a tree survey, an arboricultural impact assessment and a tree protection plan and method statement. The hedgerows and trees should be retained wherever practicable. Any losses would have to be fully justified and mitigated with appropriate replacement planting. Proposed landscaping would have to enhance the rural character of the site with native species. The ecological appraisal should include any necessary mitigation measures and a scheme for biodiversity enhancement.

Drainage and flood risk

4.10 It is noted that the site falls within flood zone 1 and so there would be no requirement for you to demonstrate compliance with the sequential or exceptions tests. A site-specific flood risk assessment and drainage strategy would be required. This should be based on sustainable drainage principles and should show that surface-water run-off from the developed site would not exceed that for the undeveloped site for an equivalent rainfall event. Lancashire County Council is the Lead Local Flood Authority for the Wyre area and has produced some guidance with regard to surface-water management which can be accessed via the following link: <http://www.lancashire.gov.uk/media/657248/LLFA-Standing-Pre-Application-Advice.pdf>.

Access and highway safety

4.11 This was a matter discussed at considerable length in our meeting. Highway capacity is a key issue for the borough and the Council is working closely with Highways England and Lancashire County Council as Local Highway Authority on the development of the emerging Local Plan. The main consideration is the capacity of Junction 1 of the M55 motorway. This junction has seen some improvements in recent years but those works have largely been undertaken to absorb the impact of development in the north Preston area. It is now considered that the junction is operating at capacity and no realistic schemes to extract additional capacity from the junction have been identified. The potential to develop a new motorway junction from the M6 has been considered but it is understood that there would be no national policy support for such a scheme in the absence of a major strategic development proposal of the type that is unlikely to be seen in the borough. In considering this option, the Council and Highways England have been mindful of the essentially rural nature of the A6 corridor and the characters of the settlements it serves. Even were a new motorway junction justified, the delivery of such would be on a timescale that would exceed the emerging Local Plan period and would not assist the assessment of current development proposals. As a result of these key constraints, the Council is unable to allocate additional land within the A6 corridor for residential development.

4.12 As we explained, the County's calculations of capacity take into account three recent, strategic proposals at Nateby Crossing Lane, Joe Lane and Daniel Fold Lane. It is acknowledged that the Nateby Crossing Lane application was refused by Wyre Borough Council's Planning Committee on localised highway safety impacts. An appeal against this determination has been lodged. LCC are of the opinion that the decision is indefensible and that the scheme will come forward, and are therefore maintaining the stance that it should be taken into account as part of any assessment of highway capacity. As explained in the meeting, on the basis of this approach, the County has lodged objections against the current residential development proposals in the area and an application has consequently been recently refused in Barton. To date, this approach has not been tested through appeal. However, even if the County's stance on the Nateby Crossing Lane application was not accepted by the Planning Inspectorate and permissions for other schemes were granted as a result, this would only release a capacity of some 270 new units, and this would be taken up almost entirely by proposals currently in the system.

4.13 In addition to the issues relating to highway capacity, we discussed the sustainability of the site in terms of access to services and also any factors that might outweigh the highway capacity concerns. It was noted that Bowgreave is a relatively small settlement with no shops or community facilities other than the Garstang Academy secondary school. You questioned whether the provision of affordable or retirement accommodation would be looked upon more favourably. As explained, occupants of affordable homes are no less likely to be dependent upon private car use and, if it could be demonstrated that car ownership/use were lower for that type of development, the lack of facilities in Bowgreave would then render the proposal unsustainable. The same is true for retirement accommodation where car ownership may be lower but where occupants would be likely to be less mobile and with a greater vulnerability to social isolation. Again such a scheme would be judged unsustainable. As discussed, it would be possible for LCC to request contributions toward sustainable travel modes in order to improve the connectivity of the site to local community services. However, it is also recognised that resource pressures are likely to mean the withdrawal of subsidies for local, rural bus services which would result in closure where the service is not commercial viable. As such, a contribution towards local sustainable transport provision would not be seen as a realistic solution. No measures were identified that would weigh sufficiently in favour of development so as to outweigh the severe detrimental impact that would arise to the highway network.

4.14 As discussed, Lancashire County Council as the Local Highway Authority is unable to participate in pre-application discussions at the present time and so no comments are available as to the potential impact of the scheme on the local highway network. It is noted that the consultee response in relation to the proposal immediately to the south did not raise any such concerns. The Council cannot, however, offer any additional advice on this matter.

Sustainability considerations

4.15 In our meeting we discussed the potential to provide a facility such as a community shop on the site in order to improve the sustainability credentials of the development and settlement. It is not considered that a scheme of the scale proposed would justify a requirement for any services provision and, if such were proposed, you would need to demonstrate that the development justified the provision in order for any weight to be attached to it. The Council cannot offer any evidence to suggest that either the developments currently proposed when considered cumulatively or Bowgreave as a settlement would be able to support a community facility. Furthermore, given the position of the site on the periphery of the village, it would not be a desirable location for the provision of a village shop. Again, it is not considered that the provision of a community facility would outweigh the harm to highway safety that would arise from the increase in pressure on the network.

Other issues

4.16 Part of the site falls within a defined Minerals Safeguarding Area and so Policy M2 of the Joint Lancashire Minerals and Waste Local Plan is relevant. This policy states that incompatible development will not be supported on land within a minerals safeguarding area unless the applicant can demonstrate that: the mineral is no longer of value or has been fully extracted; the full extent of the mineral could be satisfactorily extracted prior to development; the development is temporary and would not prevent future extraction; there is an over-riding need for the development; the depth of the mineral would make prior extraction unfeasible; or that extraction would cause land stability issues. The

Council would consult Lancashire County Council as the Local Minerals and Waste Authority on this matter and so it would need to be addressed in any submission.

5.0 SUBMISSION REQUIREMENTS

5.1 A full application would require the following:

- Application form
- Fee
- Planning statement
- Design and access statement
- Landscape and visual impact assessment
- Transport assessment including an assessment of accessibility and a draft framework travel plan
- Flood risk assessment
- Phase 1 ecological survey
- Tree survey and arboricultural impact assessment
- Agricultural land classification assessment
- Heritage statement
- Phase 1 study to establish the potential for land contamination
- Location plan
- Access plan
- Indicative layout/parameters plan
- Drainage survey and strategy
- Draft legal agreement including solicitors details and proof of title

5.2 It is recommended that the local Parish Council and local residents be informed and consulted on any proposed scheme prior to the submission of a formal planning application to enable questions and concerns raised at an early stage in the process. A Statement of Community Involvement should be submitted with any formal application.

6.0 OTHER

6.1 Any advice given by Council officers for pre-application enquiries represents their professional opinion but should not be taken as indicating any formal decision by the Council as local planning authority due to the democratic requirements of the application process. Any views or opinions expressed are given in good faith and to the best of the officer's ability, without prejudice to the formal consideration of any planning application following statutory public consultation, site assessment and the evaluation of the information and plans submitted as part of a formal application. Any subsequent alterations to local and national planning policies might affect the advice given and the subsequent formal consideration of the application, especially if some time elapses between the pre-application advice and the submission of an application. The weight that can be given to the pre-application advice will, therefore, diminish over time.

6.2 Please note that the Council will write to Parish/Town Councils and Local Ward Members informing them of the pre-application meeting on a private and confidential basis.

6.3 The details of any pre-application enquiry and responses given are treated in confidence as far as the law will allow. Please be aware that under the provisions of the Freedom of Information Act and the Environmental Information Regulations any information submitted as part of pre-application discussion cannot automatically be deemed to be in confidence as the Council may receive a request for information under

these Acts. If such a request is received the Council will ask you to identify any information that you require not to be disclosed under these Regulations together with any supporting reasons. Please note, however, that the Council shall be responsible for deciding at its absolute discretion whether any information requested is exempt from disclosure under the Regulations.

Case Officer's Signature: 

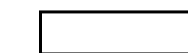
Senior Officer's Signature: 

Date: 4 March 2016

Appendix 4

	Site Name	Planning Application Reference	Planning Application Approval Date	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	Total Completions	Comments
SA3/1	Fleetwood Dock and Marina	N/a	N/a															10	20	20	20	20	20	110	Technical flood mitigation, SSSI and biological heritage site issues resulting in challenging site viability. Requires masterplanning exercise prior to application submission. Unlikely to come forward until 2025 at a rate of 20dpa maximum due to market area.
SA3/4	Forton Extension	18/00469 18/00418	Pending												20	35	35	35	35	35	35	35	35	300	Masterplan to be agreed with Wyre prior to application and site to take into account high pressure gas mains and avoid impact on listed buildings. Outline applications only submitted for 357 dwellings. Pending decisions.
SA3/3	West of Gt Eccleston	15/00576 16/00650	Approved												10	35	35	35	35	35	35	35	35	290	Outline applications only made for 183 dwellings. Build out rates would more likely achieve 35dpa.
SA1/5	South East Poulton	14/00607 16/00444 16/00742 16/01043	20/1/16 2/11/16 5/08/18 17/11/16												25	25	25	25	6					106	Application 16/01043 since has submitted a request for a removal of affordable housing contribution (see application 18/00680). Viability issues due to ground conditions, unclear if application can come forward within plan period. 130 dwellings to be removed from figure.
SA1/3	Land Between Fleetwood Rd North and Pheasant Wood																							0	Former landfill site. In absence of application unclear if site is suitable for development in light of ground conditions and is circa 50% in flood zone 2. Challenging market area for mitigation measures. Considered undeliverable and undevelopable in absence of sufficient evidence base.
SA1/16	West of Cockerham Rd														20	30	30	30	30	30	30	30	30	260	Updated to reflect revised allocation
SA4	Hillhouse EZ																							0	No application lodged. Heavily constrained site with little evidence base. Site is located in flood zone 2 and 3, adjacent to SPA, SSSI, BHS and Ramsar site. Requires masterplan layout prior to application submission. Understood to be contaminated. Challenging market area leading to slower build out rates. Undeliverable and undevelopable.
																						Total	1066		

Appendix 4
Savills Assessment of Housing Delivery in Wyre
23/10/2018



Appendix D – Consultee 2 (National Grid)



Subject: FW: Wyre Local Plan to 2031 Partial Review Scoping Consultation
Attachments: 20.04.14 Wyre Council Local Plan Scoping Mar-Apr 20.pdf; 20.04.14 Wyre Local Plan to 2031 Partial Review Scoping Consultation.pdf

From: National Grid (Avison Young - UK) <nationalgrid.uk@avisonyoung.com>
Sent: 14 April 2020 14:13
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Wyre Local Plan to 2031 Partial Review Scoping Consultation

Dear Sir / Madam

We write to you with regards to the current consultation as detailed above in respect of our client, National Grid.

Please find attached our letter of representation. Please do not hesitate to contact me via nationalgrid.uk@avisonyoung.com if you require any further information or clarification.

Regards



Planner

nationalgrid.uk@avisonyoung.com

avisonyoung.co.uk

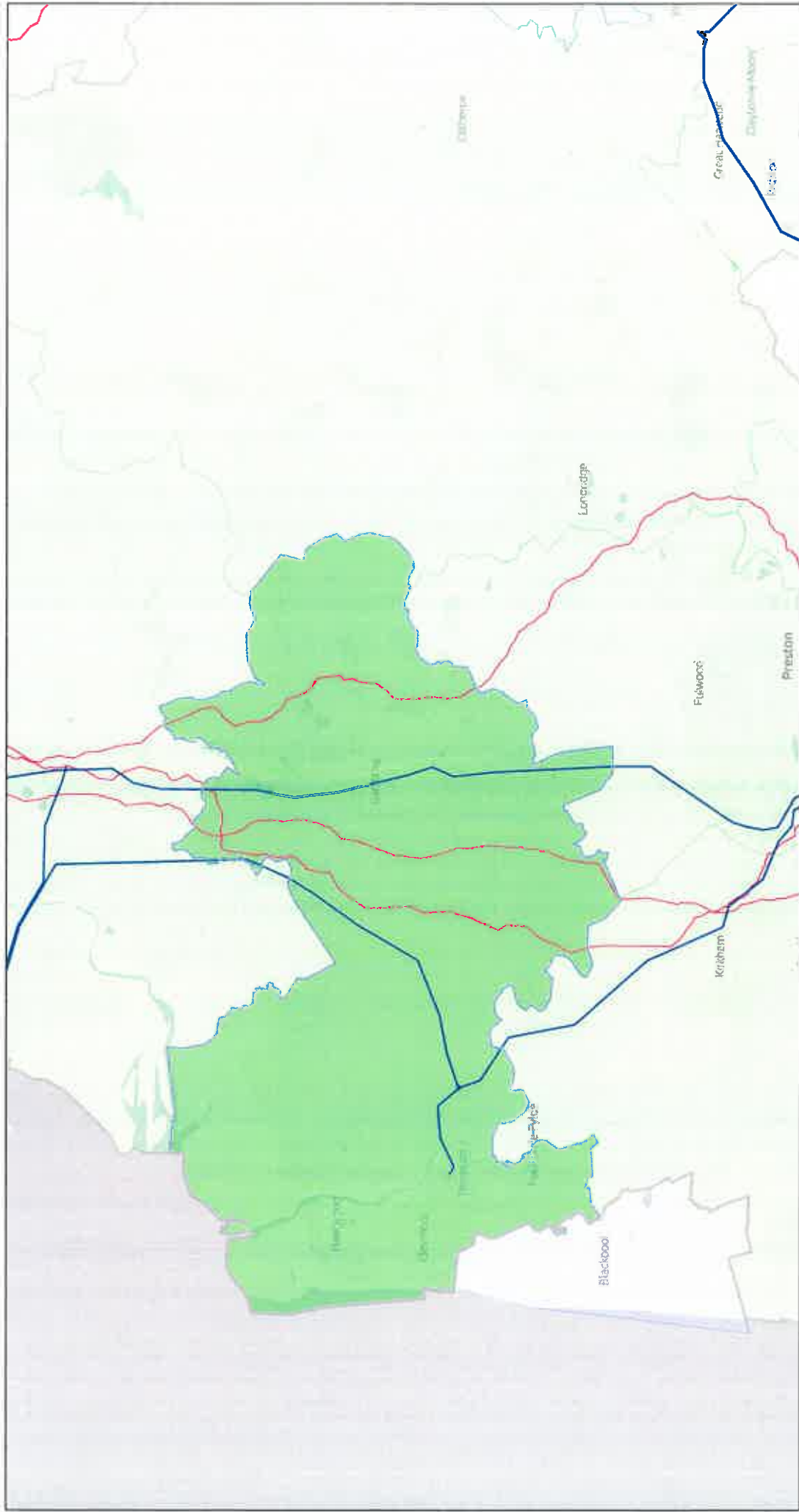
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Wyre Local Plan to 2031 Partial Review Scoping Consultation



14/04/2020, 11:59:02

Electric_Assets_4020

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Electric_Assets_7634

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Gas_Assets_6495

Development_Plan_Monitoring_Consultations_vw_1604

Development_Plan_Monitoring_v2_977_5701

Development_Plan_Monitoring_v2_977

Development_Plan_Monitoring_v2_977_422_9976

1:144,136



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Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
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14 April 2020

avisonyoung.co.uk

Wyre Council
via email only

Dear Sir / Madam

**Wyre Local Plan to 2031 Partial Review Scoping Consultation
March – April 2020
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

National Grid assets within the Development Plan Document area:

Following a review of the above Development Plan Document, we have identified that one or more National Grid assets within the Plan area.

Details of the National Grid assets are provided below.

Electricity Transmission

Asset Description

4TD ROUTE TWR (001 - 070): 400Kv Overhead Transmission Line route: HEYSHAM - PENWORTHAM - STANAH 1
VF ROUTE TWR (001 - 071): 400Kv Overhead Transmission Line route: HEYSHAM - PENWORTHAM - STANAH 1
ZX ROUTE TWR (248R - 444R): 400Kv Overhead Transmission Line route: HEYSHAM- HUTTON - PENWORTHAM 1

Electrical Substation: STANAH 400KV
Electrical Substation: STANAH 132KV

Gas Transmission

Asset Description

Gas Transmission Pipeline, route: CARNFORTH TO TREALES
Gas Transmission Pipeline, route: LUPTON TO BRETHERTON
Gas Transmission Pipeline, route: GRAYRIGG TO SAMLESBURY

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

~~0191 269 0094~~, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

~~0191 269 0094~~, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



~~0191 269 0094~~ MRTPI

Director

0191 269 0094

nationalgrid.uk@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: plantprotection@nationalgrid.com

Cadent Plant Protection Team
Block 1
Brick Kiln Street
Hinckley
LE10 0NA
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>

Appendix E – Consultee 3 (Barnacre-with-Bonds Parish Council)

~~CONFIDENTIAL~~

Subject: FW: Comments - partial review of the Wyre Local Plan to 2031

From: ~~CONFIDENTIAL~~ <clerk@barnacrewithbondsparishcouncil.org>
Sent: 23 March 2020 10:15
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Comments - partial review of the Wyre Local Plan to 2031

Good morning,

Please see below the comments from the Barnacre-with-Bonds Parish Council in relation to the partial review of the Wyre Local Plan to 2031:

The Parish Council requests that when Wyre planning review the objectively assessed housing needs (Housing OAN) they consider the latest available data. The Office of National Statistics (ONS) has recently published 2016 based Household Projections. These supersede the 2014-based projections which were a key input into Wyre Council's determination of the objectively assessed housing needs. The 2016-based household projections suggest reduced household growth in Wyre over the Local Plan period 2011 to 2031 by some 668 households. In addition the Government within its National Planning Policy Framework has revised its methodology for calculating local housing needs.

The Parish Council requests that the revised data and methodology are used when determining Wyre Council's objectively assessed housing needs and the allocation of development sites for this review of Wyre Local Plan to 2031.

Kind regards

~~CONFIDENTIAL~~

Clerk & RFO to Barnacre-with-Bonds Parish Council

Appendix F – Consultee 4 (Blackpool Council)

[Redacted]

Subject: FW: Blackpool Council Response to the Partial Review Scoping Consultation
Attachments: BC response to Wyre partial review dated 14 Apr 2020.doc

From: [Redacted] <[Redacted]@blackpool.gov.uk>
Sent: 14 April 2020 12:28
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: [Redacted] <[Redacted]@wyre.gov.uk>; [Redacted] <[Redacted]@wyre.gov.uk>; [Redacted] <[Redacted]@blackpool.gov.uk>
Subject: Blackpool Council Response to the Partial Review Scoping Consultation

Good Afternoon,

Please find attached Blackpool Council's response to the Local Plan Partial Review Scoping Consultation.

Kind Regards

[Redacted]

[Redacted]
Senior Planning Officer

Planning Strategy Team
Growing Places Department | Blackpool Council | Number One Bickerstaffe Square | Blackpool | FY1 1LZ

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Email secured by Check Point

Date: 14th April 2020

[REDACTED]
Planning Policy Manager
Wyre Council
Civic Centre, Breck Road
Poulton-le-Fylde
FY6 7PU

Direct Line: **[REDACTED]**
Email: **[REDACTED]**@blackpool.gov.uk

Wyre Local Plan Partial Review - Scoping Consultation

Dear **[REDACTED]**

Thank you for inviting Blackpool Council to comment on the scope of the Partial Review for the Wyre Local Plan to 2031.

We note that the review is focussed on the detail set out in adopted policy LPR1 which states:

'The Local Planning Authority will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. This will commence before the end of 2019 with submission of the review for examination by early 2022. Specific matters to be addressed by the review include the following:

1. An update of Objectively Assessed Housing Needs.

2. A review of transport and highway issues taking into account:

(i) housing commitments and updated housing needs;

(ii) implemented and committed highway schemes;

(iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and

(iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.

Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.'

In addition we understand the review will also ensure the plan policies are in line with NPPF 2019 which was published post the adoption of the Local Plan.

In light in what is set out in the scoping consultation email we would like to make the following observations:

We note that it is not clear at this stage whether Wyre Council will adopt a housing need figure in line with the Standard Method or alternatively propose a higher level of housing demonstrating exceptional circumstances. Blackpool Council therefore welcomes continued engagement on this

GROWING PLACES
Blackpool Council
PO Box 17
Blackpool
FY1 1LZ

Contact
T: (01253) 477477
www.blackpool.gov.uk



matter through the Duty to Co-operate.

The consultation email states that revisions to allocations will not fall within the scope of this partial review and will not be taken forward. The Inspector's Report to the Local Plan states: *'As part of the review transport and highway issues would need to be revisited, including the effects of committed highway schemes, the scope for sustainably located sites and additional infrastructure requirements.'*

Blackpool Council understands that most sites would remain relevant however we note what the Inspector appeared to raise concerns regarding housing allocations at Inskip and Forton in Paragraph 74 of his report.

The Inspector also raised concerns over the highways evidence and stated *'With regard to highway capacity, it has had the effect of not only limiting the strategy options but also constraining the ability to meet the OAN. Thus information on highway capacity forms a crucial component of the evidence base. LCC's report (ED094a) is helpful in understanding the constraints of the options and particular settlements/sites. However, it is necessarily a high level primarily desktop assessment. Moreover, although having regard to committed schemes, it does not appear to robustly model how new transport infrastructure could cost effectively limit the significant impacts of development.'*

In light of the above we consider that the implications of undertaking additional highways assessments and consideration of where sustainable modes of transport can be maximised means that the partial review does require a review of housing site allocations and potentially strategic options (refer paragraph 72 of the Inspector's Report).

If you require any further clarification on the issues raised in this letter please do not hesitate to contact me.

Yours sincerely



Head of Planning and Transport Strategy



Appendix G – Consultee 5 (Emery Planning)

~~CONFIDENTIAL~~

Subject: FW: Regulation 18 - LP Review
Attachments: Letter to Wyre LPA - Reg 18 LP Review.pdf

From: ~~CONFIDENTIAL~~ @emeryplanning.com>
Sent: 14 April 2020 15:52
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: ~~CONFIDENTIAL~~ @emeryplanning.com>
Subject: Regulation 18 - LP Review

Dear Sir/Madam

Please find attached letter in relation to the scope for the LP review.

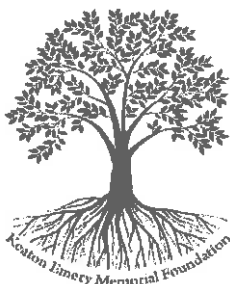
I would be grateful if you would confirm safe receipt.

Kind regards

~~CONFIDENTIAL~~

~~CONFIDENTIAL~~ BA (Hons) MPlan MRTPI
Principal Consultant

Tel: 01625 433 881
Fax: 01625 511 457
Direct dial: 01625 442 787
~~CONFIDENTIAL~~
www.emeryplanning.com



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[REDACTED]

Planning Policy Manager
Wyre Borough Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

14 April 2020

EP ref: 17-366

[REDACTED]

T: 01625 442 786

[REDACTED]@emeryplanning.com

Dear [REDACTED]

Re: Wyre Local Plan Partial Review – Overall scope

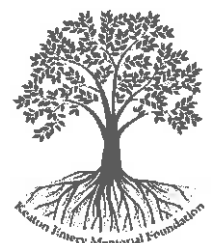
We are instructed on behalf of several clients with site interests across Wyre. We were also involved in the EIP for the adopted local plan and we are familiar with the background to the development plan.

We acknowledge the need for a partial review of the local plan in accordance with Policy LPR1. It is noted from the email circulated to interested parties by the Council that there will be no changes made to allocations already made through the adopted local plan. We fully support this approach.

In terms of housing, the standard method should be the starting point for establishing the housing requirement for the Borough. From experience the standard method does not address affordable housing needs in many local plan authority areas, and we see this is an important component of the evidence base. Other potential considerations is whether or not there is a need to uplift the standard method for economic reasons and to take account of the needs of households not including in the household projections such as C2 institutional uses.

The Council will need to consider whether any deliverability issues for key site allocations have arisen and how the current Covid19 restrictions are likely to undermine delivery. This is particularly important for site allocations where the Council requires a Masterplan to be agreed in advance of any planning permission being granted. This policy should be reviewed. It will also be necessary to consider what actions are required in order to maintain a five-year housing land supply of deliverable sites going

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forwards not only as part of the local plan review but also the Annual Position Statement which we note the Council intends to submit.

We would expect that the Council will carry out its duty to co-operate obligations as part of the local plan review with all neighbouring authorities, which comprise Blackpool, Fylde, Preston and Lancaster. It will be important that the Council allows for early engagement with neighbouring authorities, particularly in terms the overall housing requirement and highways constraints and any unmet needs across the region.

We are keen to engage positively with the emerging local plan review and wish to be kept informed as to progress and future consultations as the relevant evidence becomes available e.g. highways constraints. In the meantime, please do not hesitate to contact us.

Yours sincerely
Emery Planning

 BSc (Hons), MRTPI
Director

Appendix H – Consultee 6 (Fylde Borough Council)

~~CONFIDENTIAL~~

Subject: FW: PR Scoping (Reg 18 Letter)
Attachments: Fylde Council response to Wyre reg 18 consultation.pdf

From: ~~Edith Thomas~~ @fylde.gov.uk>
Sent: 09 April 2020 15:49
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: ~~Edith Thomas~~ @fylde.gov.uk>; ~~Edith Thomas~~ @fylde.gov.uk>; ~~Edith Thomas~~ @fylde.gov.uk>; ~~Edith Thomas~~ @fylde.gov.uk>; ~~Edith Thomas~~ @fylde.gov.uk>; ~~Edith Thomas~~ @fylde.gov.uk>
Subject: PR Scoping (Reg 18 Letter)

Dear sir/madam

Please find attached the response of Fylde Council to your consultation on the Scope of the Partial Review of the Wyre Local Plan (2011-2031).

Kind regards



~~Edith Thomas~~
Principal Planning Officer (Policy)
t: 01253 658419
e: ~~edith.thomas~~@fylde.gov.uk
Fylde Borough Council
www.fylde.gov.uk

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Civic Centre, Breck Road
Poulton-le-Fylde FY6 7PU

Our Ref: Wyre reg 18

Your Ref:

Please Ask For: **[REDACTED]**

Telephone: 01253 658460

Email: **[REDACTED]**@fylde.gov.uk

Date: 09 April 2020

Dear **[REDACTED]**

Wyre Local Plan (2011-2031) Partial Review Scoping Consultation

Thank you for inviting Fylde Council to comment on the scope of the Wyre Local Plan Partial Review. The two councils have maintained dialogue and engagement concerning the progress of our respective partial reviews through the Fylde Coast Duty to Co-operate meetings and through direct engagement between officers, through the governance provided by the Duty to Co-operate Memorandum of Understanding between the Fylde Coast Authorities and Lancashire County Council. We will continue to work with you in relation to cross-boundary strategic matters in support of your Partial Review.

The consultation letter makes reference to the two triggers that have prompted the need for the Partial Review. The first is the matter of the requirements of the National Planning Policy Framework (February 2019) paragraph 212, for the revision of the plan to reflect policy changes in the new Framework. In this respect, Wyre Council is in a similar position to Fylde Council in that the examination of both plans continued and both were adopted under the transitional arrangement of paragraph 214 of the new Framework. Fylde Council supports the inclusion of this element within the Partial Review and Wyre Council's efforts to ensure that its Local Plan remains compliant with national policy.

The second trigger is the requirement of Policy LPR1 of the Wyre Local Plan (2011-2031) for an early Partial Review of the Local Plan. Again the nature of this trigger is similar to that faced by Fylde Council with our own Partial Review, in that it is included within the text of the adopted local plan. Fylde Council supports Wyre Council in bringing forward its Partial Review to address this requirement in its Local Plan, notwithstanding its commencement after the date stipulated in the policy.

The description within the consultation letter of the scope of this element of the Partial Review is limited and does not set out all elements that are required to be part of the Partial Review by Policy LPR1. The text of Policy LPR1 states:

The Local Planning Authority will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. This will commence before the end of 2019 with submission of the review for examination by early 2022. Specific matters to be addressed by the review include the following:

1. An update of Objectively Assessed Housing Needs.
2. A review of transport and highway issues taking into account:
 - (i) housing commitments and updated housing needs;
 - (ii) implemented and committed highway schemes;
 - (iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and
 - (iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.
3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.

The consultation letter simply notes that the matters include an update of objectively assessed needs and review of transport and highway issues. However, it will be necessary for the Partial Review to include all elements of the requirements set out in Policy LPR1, even if the conclusion is that certain elements are not required to achieve the objective of the policy.

The consultation then invites representations into the scope of the Partial Review but qualifies this by stating:

However it should be noted that revisions to allocations, for example, will not fall within the scope of this partial review and will not be taken forward.

This directly contradicts the requirement of part 3 of Policy LPR1. It could be that the part 3 of Policy LPR1 might not be necessary following the assessments in parts 1 and if necessary 2. However, in the absence of any indication at this stage as to the method to be used for the reassessment of housing needs in part 1, the retention of parts 2 and 3 in full is necessary for the Partial Review to comply with the policy. Therefore, the Partial Review cannot dismiss potential sites without assessment until a revised needs assessment has established that no additional sites need to be identified. If a need for additional sites is identified, this will trigger a requirement to review the availability of additional sites.

The Partial Review of the Fylde Local Plan to 2032 examines the issue of unmet need in Wyre that has led to the trigger for Wyre's Partial Review through Policy LPR1. As currently drafted, Fylde's partial review notes that, following Wyre's Partial Review, any need remaining unmet could be met in Fylde, within the housing requirement expressed as a range. The Partial Review of the Fylde Local Plan to 2032 cannot eliminate the need for the provisions of Policy LPR1 to be enacted. The Wyre Partial Review including all the elements required by Policy LPR1 will need to be undertaken in full.

We look forward to the publication of the Wyre Local Plan Partial Review in due course.

Should you have any queries regarding the above, please do not hesitate to contact me.

Yours sincerely



Head of Planning and Housing

Appendix I – Consultee 7 (Garstang Town Council)

~~CONFIDENTIAL~~

Subject: FW: Regulation 18 Letter - Wyre Local Plan 2011-2031

From: info@garstangtowncouncil.org <info@garstangtowncouncil.org>

Sent: 14 April 2020 15:38

To: ~~info@garstangtowncouncil.org~~@wyre.gov.uk; Policy, Planning <Planning.Policy@wyre.gov.uk>

Subject: Regulation 18 Letter - Wyre Local Plan 2011-2031

Good afternoon

Garstang Town Council wish to respond to Regulation 18 Letter - Wyre Local Plan 2011-2031 (Wyre email dated 28/02/2020) as follows:

Garstang Town Council- Scope of Partial Review

The Town Council are concerned for the future of Garstang Town Centre. Therefore, we request that the suitability of Policy EP4 (Town, District, Local and Neighbourhood Centres) is fully reviewed. The Town Council would also like to consider the creation of a new Supplementary Planning Document (SPD) for the town centre or a specific allocation, which can hopefully ensure that businesses can bounce back from these unprecedented times. These more targeted powers should protect the Town Centre Primary Shopping Areas from out of town competition, explore 'flexible change of use' to help bring redundant shops back into use and offer more detailed advice for business owners.

Without an adopted CIL charging schedule we also want to review how infrastructure funding could be better captured. The Town has a number of large residential, mixed use and employment allocations which will all increase pressure on town centre services and amenities. Therefore, it should be possible to better target funding directly in the areas that will be most affected. This funding could be used to ensure that appropriate linkages are provided between these allocations and the Town Centre to ensure business can best capture the increase expenditure that will be created. The key issues include parking provision in the town centre, cycle and pedestrian access and more long-term strategies such as a park and ride train platform.

Please would you acknowledge receipt.

Thanks, ~~info@garstangtowncouncil.org~~

~~info@garstangtowncouncil.org~~

Town Clerk

Garstang Town Council

Tel: ~~01253 722180~~

www.garstangtowncouncil.org

Monday to Thursday

Read here the [Email Contact Privacy Notice](#) which covers all emails sent in to Garstang Town Council and sent by Garstang Town Council

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Email secured by Check Point

Appendix J – Consultee 8 (Graham Anthony Associates)

Subject: FW: Wyre Local Plan Review:

From: [REDACTED]@grahamanthonyassociates.com>

Sent: 14 April 2020 10:38

To: Policy, Planning <Planning.Policy@wyre.gov.uk>

Cc: [REDACTED]@grahamanthonyassociates.com>; [REDACTED]

[REDACTED]@grahamanthonyassociates.com>

Subject: Wyre Local Plan Review:

Good morning, Wyre

Please find attached our representations:

We request that Policy SP4 (Countryside Areas) is included within the review specifically the hierarchy imposed under criterion 4. The implementation of this Policy creates a number of issues for decision makers and we are aware that the text has been reviewed by an external consultant who deemed it flawed. Given the locational characteristics of Wyre's economy, holiday and residential accommodation are deemed equally if not more important than 'live/work units', tourism destinations or employment units. Thus, the approach taken seems onerous driven by 'viability' alone and the prevention of residential accommodation in unsustainable locations. However, this is overly oppressive and out of kilter with the modern planning system, focusing on the inclusion of Part Q permitted development. The scope of the review should look at segregating the conversion of buildings from Policy SP4 and introducing a separate policy similarly to the approach taken by nearby South Lakeland (Development Management Policies, Adopted 28 March 2019).

Policy DM16 – Conversion of Buildings in Rural Areas

Purpose: To set policy and criteria to indicate how and when traditional buildings in rural areas may be converted to other uses.

The conversion and re-use of buildings in the open countryside* for housing, employment, tourism, recreation and community uses will be supported where:

1. the building is of traditional materials and construction, of a traditional design and constructed in a permanent and substantial manner; and
2. the building is capable of conversion without the need for extension, significant alteration or reconstruction; and
3. for residential use the building is redundant or disused, adjacent to or in close proximity to an existing habitable dwelling, and the number of dwellings proposed is appropriate to the surroundings; and
4. safe road access is in place or can be created without damaging the rural character of the surrounding area; and
5. the proposal does not create additional demands for new agricultural buildings; and
6. the building can be serviced by utilities which are, or can be made, readily available; and
7. the design:
 - a. does not result in significantly different external eaves and ridge heights; and
 - b. for residential use, restricts domestic curtilage provision to a level consistent with adjoining buildings and landscape or settlement character; and
 - c. uses original or matching stone or other material in any rebuilding of external walls.

When granting permission under this policy the Council will remove permitted development rights where necessary to protect landscape or settlement character which would normally apply to the building and its curtilage.

*outside Service Centres and the scope of policy DM13 on Development in Small villages and Hamlets.

We also consider that a full review of Policy EP9 (Holiday Accommodation) is necessary given that established holiday parks are obligated to provide the same viability information as new sites. We feel that it would be more appropriate to set some parameters to differentiate such as existing holiday accommodation site's who have been trading for less than 5 years.

Thanks

 MA (Hons) MRTPI

Principal Planner

Graham Anthony Associates

2 Croston Villa, High Street, Garstang, Preston, PR3 1EA.

T: 01995 604514

W: GrahamAnthonyAssociates

Appendix K – Consultee 9 (Highways England)

[REDACTED]

Subject: FW: Regulation 18 Letter
Attachments: HE Letter - Scope of Wyre Local Plan Review.pdf

From: **[REDACTED]** @highwaysengland.co.uk>
Sent: 27 March 2020 16:53
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: **[REDACTED]** @highwaysengland.co.uk>
Subject: RE: Regulation 18 Letter

FAO: Planning Policy Team, Wyre Council

Please find attached response letter from Highways England in response to the Wyre Local Plan to 2031 Partial Review Scoping Consultation.

If you would like to discuss anything about his email, please contact me.

Kind regards,

[REDACTED], Assistant Spatial Planner
Highways England | Piccadilly Gate | Store Street | Manchester | M1 2WD
Tel: **[REDACTED]**
Mob: **[REDACTED]**
Web: www.highwaysengland.co.uk.

[REDACTED]
Planning Policy Manager
Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

[REDACTED]
Assistant Spatial Planner
8th Floor
Piccadilly Gate
Store Street
Manchester M1 2WD

Direct Line: **[REDACTED]**

27 March 2020

Sent Via Email

Dear Sir / Madam,

Wyre Local Plan to 2031 Partial Review Scoping Consultation

Thank you for inviting Highways England to comment as part of the Wyre Local Plan to 2031 Partial Review Scoping Consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). We are responsible for the operating, managing capacity, maintaining and improving the SRN - the SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. **It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.**

The SRN in the area of Wyre predominantly consists of the A585 trunk road (M55 Junction 3 to Fleetwood) along with a section of the M6 motorway running through the east of the borough, although further afield the district is served also by the M55 motorway.

Highways England's approach to engaging with the planning system is governed by the advice and guidance set out in **The Strategic Road Network Planning for the Future - A guide to working with Highways England on planning matters (2015)**.

The document is written in the context of statutory responsibilities as set out in Highways England's Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);
- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable

development ('the Circular').

Highways England notes that the need for there to be an early review of the Wyre Local Plan 2011 – 2031 has its origins in the Inspector's final report into the Local Plan Examination. Highways England was supportive of the Inspector's decision that the Plan be adopted, but subject to an early review to attempt to secure higher levels of housing growth. The resulting Local Plan Policy LPR1 is copied below:

1. *An update of Objectively Assessed Housing Needs.*
2. *A review of transport and highway issues taking into account:*
 - (i) *housing commitments and updated housing needs;*
 - (ii) *implemented and committed highway schemes;*
 - (iii) *the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and*
 - (iv) *(iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.*
3. *Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.*

Clearly, highways form an important component of the review, but also note the Inspector's original report comments that (28) "... when discussing the housing requirement, I consider that the highway constraints are overstated" and that in seeking to achieve higher levels of growth there was (74) "the need to focus significant development in locations that can be made sustainable and where the use of sustainable transport modes can be maximised is in my view not given sufficient weight in the [transport evidence] analysis...". It is therefore clear that in securing higher levels of housing growth in the borough, it is the wider sustainability of access by different transport modes that must be considered and therefore inform the Review itself.

In this way, there is now a need for Wyre Council to develop an updated transport evidence base to inform the Review, and one that is much broader – considering accessibility by and improvements to sustainable modes more seriously as well as highways.

A wider transport impacts and needs study is required as part of the evidence base for the Local Plan review. This study should consider all modes of transport for potential infrastructure solutions to support growth, and not just focus on seeing highways infrastructure as being the only answer without properly exploring any alternatives that could form part of a credible wider solution to increased transport demand associated with the Plan growth.

Where infrastructure needs are identified to facilitate the Council's full OAN growth requirements in a sustainable way, and where measures are not already within the committed programmes of the infrastructure providers concerned, the Council should take the lead in both identifying and promoting those solutions for delivery at the appropriate time within the lifetime of the Plan in consultation with the provider(s) concerned.

As stated in our comments at the Main Modifications stage, it is important to note that, whilst Highways England wishes to be involved with the development of the Wyre Council's transport evidence for the Local Plan review, we believe that this work should be commissioned and led by Wyre Council with the involvement of both Highways England and other transport and infrastructure providers. The recent government policy announcement contained within its Road Investment Strategy 2 (RIS2): 2020 to 2025 document that the A585 trunk road should be detrunked after completion of the A585 Windy Harbour to Skippool Bypass improvements in

2023 means that it will be important that Lancashire County Council (Highways) are involved in this process.

Notwithstanding this, we note the Council's intention to conduct the Local Plan review in the context of the National Planning Policy Framework (2019), and that this may therefore be informed by the latest housing needs assessment methodology. It is for Wyre Council to argue that any new calculation of Objectively Assessed Housing Need reveals that the borough is now meeting its housing need requirement over the remainder of the Plan period. Should this be the case, Highways England sees no need for there to be any updated transport evidence base requirement.

We hope that our comments are useful. If you would like to discuss anything about this letter, please contact me.

Yours faithfully,



Network Development & Planning Team

Email: @highwaysengland.co.uk

Appendix L – Consultee 10 (Hollins Strategic Land)

~~0161 275 2200~~

Subject: FW: Regulation 18 Letter
Attachments: Partial Review Scoping - Consultation Statement.pdf

From: ~~0161 275 2200~~ <~~0161 275 2200~~@hsland.co.uk>
Sent: 14 April 2020 16:55
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: RE: Regulation 18 Letter

Hello,

I've attached our Statement on the Scoping Consultation.

Please could you confirm receipt?

Thanks,
~~0161 275 2200~~

~~0161 275 2200~~ BA MPlan MRTPI
Planning Manager



On behalf of Hollins Strategic Land | Suite 4 | 1 King Street | Manchester | M2 6AW
~~0161 275 2200~~ | ~~0161 275 2200~~ | ~~0161 275 2200~~@hsland.co.uk | www.hsland.co.uk

Local Plan Partial Review Scoping Consultation Statement

Hollins Strategic Land
April 2020

- 1.1 Policy LPR1 of the adopted Wyre Local Plan (WLP) states that WC will bring forward a Partial Review of the Plan with the objective of meeting its full Objectively Assessed Housing Needs (OAHN) and that this should have commenced before the end of 2019 with submission of the review for examination by early 2022. The WLP only managed to make provision for 96% of its identified OAHN.
- 1.2 The LPR must comply with National Policy and Guidance. It must also do as required by policy LPR1:
 1. An update of Objectively Assessed Housing Needs;
 2. A review of transport and highway issues; and,
 3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account the review of transport and highway issues.
- 1.3 Furthermore, the Inspector's Report on the Local Plan states that "*the Review should seek to secure some flexibility in housing supply*" (para. 78).

Update of Objectively Assessed Housing Needs

- 1.4 The Council's 'Five Year Housing Land Annual Position Statement 31 July 2019' (states that "*the Local Housing Need ("LHN") calculated using the Standard Methodology is substantially lower than the housing requirement in the adopted plan. The up to date figure using the standard methodology is 308 dwellings per annum (compared to the adopted Local Plan requirement of 460 dwellings per annum)*" (para. 2.3). The document concludes saying "*The Council is furthermore committed to a partial review of the Local Plan which will commence in 2019 and will update housing needs to align with new Government policy and in particular the application of the standard methodology to assessing local housing need*" (para. 4.4).
- 1.5 The Council will of course be aware that Planning Practice Guidance (PPG) confirms that the standard method "*identifies a minimum annual housing need figure*" and that "*it does not produce a housing requirement figure*" (Ref ID: 2a-002-20190220). Furthermore, the Inspector's Report (IR) on the Local Plan sets out why the Objectively Assessed Need figure of 479 dwellings per annum was justified only last year.
- 1.6 Para. 59 – 61 of the IR set out the why the OAN figure was sought by the Council; it supported the Council's strategy of jobs growth, the scale of affordable housing needs, suppressed younger household formations, modest worsening market signals and a notable fall in housing supply over recent years on population projections. It is of course important that the Council fully considers these matters when assessing the updated OAN via the Standard Methodology.

- 1.7 Furthermore, with regards the Standard Methodology, the IR stated that the “*the Government is considering how the standard methodology should be adjusted to take into account its objective of ensuring that 300,000 homes are built each year*” (para. 63). The Council must also take this into account alongside the PPG, which suggests that a reduction in the OAN resulting from the Standard Methodology need not result in changes to the housing requirement of the LP:

Local housing need will be considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method.

Review of transport and highways issues

- 1.8 The IR confirmed that significant additional highways evidence was required to support the OAN and the LP beyond the initial five-year supply. This must be prepared and examined via the LP Review.
- 1.9 There is potential that the evidence would demonstrate that the identified supply could not come forward as planned. This must be taken into account during the LP Partial Review as it could result in it being necessary for further allocations to be made.

Allocation of Sites

- 1.10 It is understood that the Council considers it unlikely that the Partial Review would need to revise existing allocations or consider new allocations given the requirement to update the OAN i.e. the Council considers that the OAN will fall to such an extent that the current LP allocations will not only provide for the revised OAN but also the required flexibility in the supply.
- 1.11 As stated, the Standard Methodology produces a minimum figure, the Council had strong reasoning for its LP OAN and the Government is seeking to significantly boost housing. Part 1 of the LP Partial Review (updating the OAN) could result in a requirement for further allocations. So too could Part 2 (reviewing highways issues) given the significant amount of evidence that was lacking for the LP examination. There is also the requirement to provide flexibility in the supply.

Providing Greater Certainty

- 1.12 The PPG states that “*the strategic policy-making authority can use subsequent plans and plan reviews as an opportunity to provide greater certainty about the delivery of the agreed strategy*”. The LP Partial Review must take this opportunity.

- 1.13 The Council has been working with developers on a number of sites via the Masterplanning process. This process has revealed potential delivery issues, suggesting that allocations may not come forward in full during the plan period as anticipated. The Council has also obtained information on delivery from developers when preparing its evidence base for the Annual Position Statement and general monitoring. The LP Partial Review must take all of this into account. The new evidence that has been gathered since adoption of the LP could demonstrate that some allocations have to be revised and that new allocations must be made to deliver the OAN and the flexibility in the supply.

Cooperating with Neighbouring Authorities

- 1.14 Para. 1.27 of the adopted Fylde Local Plan commits the Council to an early review to examine the issue of how unmet housing need of Wyre Council should be addressed, working with other authorities adjoining Wyre under the Duty to Cooperate.
- 1.15 The Wyre Review *may* result in Wyre Council being able to meet 100% of its OAN, with flexibility. However, that will not be known until 2022/23. If it is then found that assistance is required from Fylde, the unmet need will have to be delivered via a Fylde LP Review. This, in turn, would take a significant amount of time. The provision of the unmet need will not be secured for a number of years.
- 1.16 However, if Wyre and Fylde were to work together to concurrently deliver their Reviews, the unmet need could be secured much sooner. The Fylde Review/Revision would have secured housing allocations that could come forward as soon as the WLP Review were adopted.

Summary and Conclusions

- 1.17 The Partial Review must plan positively to significantly boost housing. It must be recognised that the Standard Methodology produces a minimum figure and the Review must not result in lower jobs growth, reduced provision against the scale of affordable housing needs or suppressed younger household formations. The Review must also provide flexibility in the supply. Furthermore, it must take the opportunity to provide greater certainty on the LP strategy.
- 1.18 Hollins Strategic Land would welcome the opportunity to discuss these matters in more detail with the Council in light of its ongoing presence in the Borough and its strong track record of delivering much need market and affordable housing.

Appendix M – Consultee 11 (Homes England)

[Redacted]

Subject: FW: Homes England response: Regulation 18 Letter
Attachments: Homes England response.pdf

From: **[Redacted]**@homesengland.gov.uk>
Sent: 14 April 2020 09:53
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Homes England response: Regulation 18 Letter

Hello,

Please find attached the Homes England response.

Kind regards,

[Redacted]

Manager – Partnership & Business Development



0161 200 6171

[Redacted]

1 Mann Island

Liverpool

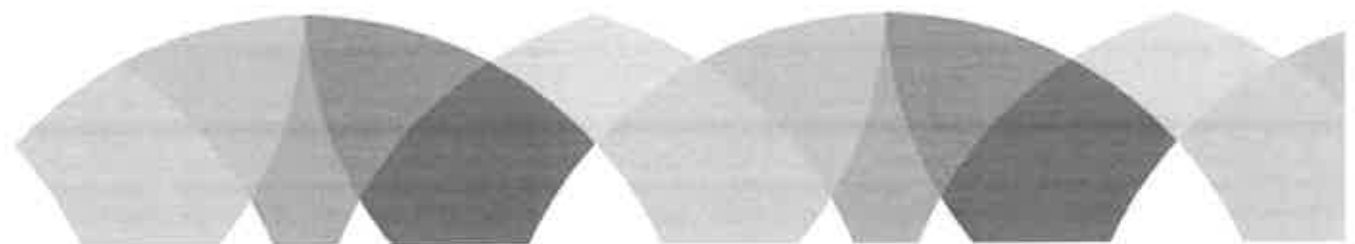
L3 1BP

[Redacted]@homesengland.gov.uk

[@HomesEngland](#)

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We're the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. [Find out more and help make this happen.](#)





Homes
England

Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

14TH April 2020

Dear Sir / Madam,

Consultation on the scope of the partial review of the Wyre Local Plan

Homes England Response

I would firstly like to thank you for the opportunity to comment on the scope of the partial review of the Wyre Local Plan.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England does not have any land holdings affected by the consultation and therefore we do not propose to make at representations at this point. We will however continue to engage with you as appropriate.

Yours faithfully,

~~Corinna Jones~~

Head of Public Sector Land (North West)

Homes England

~~Corinna Jones~~@homesengland.gov.uk

Homes England
1st Floor Churchgate House
56 Oxford Street
Manchester
M1 6EU

0300 1234 500
www.gov.uk/homes-england

OFFICIAL

Appendix N – Consultee 12 (Inskip-with-Sowerby Parish Council)

~~CONFIDENTIAL~~

Subject: FW: Regulation 18 Letter

From: ~~CONFIDENTIAL~~@inskip-with-sowerby.uk>

Sent: 19 March 2020 16:32

To: Policy, Planning <Planning.Policy@wyre.gov.uk>

Subject: RE: Regulation 18 Letter

I am writing on behalf of Inskip-with-Sowerby Parish Council in response to the Wyre public consultation with regards to the scope of the proposed partial review of the Wyre Local Plan. The Parish Council feels that nothing has changed since the Local Plan was finalised and that therefore the findings of the Inspectors report on the Local Plan remain valid as they stand. In particular the Parish Council feel that there is no scope for further development at Inskip above and beyond that catered for in the Plan in the foreseeable future

Kind regards,

~~CONFIDENTIAL~~

Inskip-with-Sowerby Parish Clerk

~~CONFIDENTIAL~~

Appendix O – Consultee 13 (Taylor Wimpey UK Limited)

Subject: FW: Wyre Local Plan - Partial Review Scoping Consultation - Representations on Behalf of Taylor Wimpey UK Limited [NLP-DMS.FID677298]
Attachments: 42026_07 Representations to Wyre Local Plan Review Scoping Consultation 03.04.2020.pdf

From: [REDACTED] <[REDACTED]@lichfields.uk>
Sent: 09 April 2020 16:00
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: [REDACTED] - TW North West <[REDACTED]@taylorwimpey.com>; [REDACTED] <[REDACTED]@lichfields.uk>; [REDACTED] - TW North West <[REDACTED]@taylorwimpey.com>; [REDACTED] - TW North West <[REDACTED]@taylorwimpey.com>
Subject: Wyre Local Plan - Partial Review Scoping Consultation - Representations on Behalf of Taylor Wimpey UK Limited [NLP-DMS.FID677298]

Dear Sir/Madam

On behalf of our Client, Taylor Wimpey UK Limited, please find attached representations to the Wyre Local Plan Partial Review Scoping Consultation.

We would appreciate if you could confirm receipt of these representations, by way of return email.

If you have any questions or require anything further, please get in touch.

Kind regards
[REDACTED]

[REDACTED]
Senior Planner
Lichfields, Ship Canal House, 98 King Street, Manchester M2 4WU
T 0161 837 6130 / 0161 222 2222 / E [REDACTED]@lichfields.uk

lichfields.uk  



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Wyre Council
Planning Policy Team
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

Date: 9 April 2020

Our ref: 42026/07/CM/MWL/18377892v2

Dear Sir / Madam

Wyre Local Plan to 2031 - Partial Review Scoping Consultation

On behalf of Taylor Wimpey UK Limited [TW], Lichfields has prepared representations to the consultation on the scope of the Wyre Local Plan Review [WLPR]. These representations are submitted in the context of TW's land interest in Wyre, namely land at Cockerham Road, Garstang.

TW is seeking to bring forward a high-quality residential development on land at Cockerham Road, Garstang [the Site]. The Site has been included as an allocation for residential development in the Local Plan [Ref: SA1/14] and Taylor Wimpey see their site as the first Phase of the comprehensive development of the allocation. Its development will assist in the delivery of sustainable development in the borough, making a significant contribution towards meeting the need for market and affordable housing in Wyre.

These representations are submitted subsequent to TW's response to the consultation on the now adopted Wyre Council Local Plan [WCLP]. We understand that the Council is seeking views on the scope of the partial review of the Local Plan. TW is keen to work with the Council to achieve an adopted Local Plan that fully meets the housing needs across Wyre and enables the Council to sustainably meet its economic ambitions.

Scope of the Local Plan

It is fundamental that the Council reviews its policies in order to ensure it has a sufficient supply of housing land to meet its full housing need over the plan period, particularly in light of the under provision of housing in the adopted plan. As such, TW supports the Council's intention to undertake an early partial review to ensure the WCLP is consistent with the most up to date National Planning Policy Framework [the Framework] (February 2019) as well as to ensure the Council is meeting its Objectively Assessed Need [OAN] for housing, in full. This aligns with the advice in §19 of the Inspector's Final Report¹ [the Inspector's Report] on the WCLP which stated that *"it is recognised that an early review of the Wyre LP will be necessary to ensure OAN is fully met over the Plan period"*.

¹ Inspector's Report on the Examination of the Wyre Local Plan, 1st February 2019

TW agrees that this is best done utilising the criteria set out in Policy LPR1 of the WCLP, alongside ensuring its consistency with national planning policy. TW generally agrees with the Council's proposed criteria and considers each, in turn below, setting out what the scope of the WLP should cover.

Consistency with National Policy

The WCLP was adopted in 2019 and under the transitional arrangements set out in §214 of the 2018 Framework, it was assessed against the policies in the 2012 Framework. The 2012 Framework has now been superseded, as such the Council must ensure that all policies align with the most up-to-date Framework (2019).

The Framework has undergone significant changes since 2012 but the boosting of housing supply remains a central objective for the UK Government. The 2019 Framework has an unequivocal emphasis on housing delivery and §59 sets out it will “support the Government’s objective of significantly boosting the supply of homes” to meet the Government’s target of delivering 300,000 net additional homes a year. Wyre Council will therefore need to play its part to meeting this objective and provide sufficient additional housing sites within the borough to meet its full OAN (479 dpa) as part of this Review.

A notable change between the Frameworks is the introduction of a ‘standard method’ for calculating local housing need, as discussed below.

The Standard Method

The Framework (§60) states that to determine the minimum number of homes needed in an area, strategic policies should be informed by a Local Housing Need [LHN] assessment, conducted using the standard method as set out in the Planning Practice Guidance [Practice Guidance], unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. However, Practice Guidance makes it clear that this figure represents **only the starting point** [Lichfields’ emphasis] for identifying housing need:

“The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.” [Lichfields’ emphasis]

The Practice Guidance also summarises the approach that should be taken to analysing affordable housing needs. It clearly states that the resultant affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments.

The Practice Guidance also sets out that there will be circumstances when a higher figure than that generated by the standard method might be considered. This is because the standard method does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

“Circumstances which might justify an uplift include where²:

- growth strategies for the area are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

² Practice Guidance Reference ID: 2a-010-20190220

- strategic infrastructure improvements are likely to drive an increase in the homes needed locally; or
- an authority has agreed to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

In addition, there may also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment (SHMA) are significantly higher than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

As part of this early review, if Wyre Council are considering deviating away from their adopted housing requirement, it is imperative that they take the full content of the Framework into account. The Framework therefore makes it clear that Wyre Council will need to look at a variety of factors, and not just the standard method, when calculating housing need. The blind adoption of the LHN figure without regard to any other factors, or consideration of whether there are exceptional circumstances, is not an appropriate start and end point for the Council. In TW’s opinion, the Inspector’s requirement for an early review within the plan was to ensure the Plan could be found sound at Examination and the full OAN could be met in the longer term. It should not be used as a mechanism to suppress the adopted housing requirement figure.

This is especially relevant as the LHN is expected to show a reduction in annual housing requirement (as discussed below) compared to the current, adopted figure. Wyre Council must therefore ensure that this Review is not used as a mechanism to reduce its housing requirement in line with the LHN figure as this will have a knock-on impact on other areas of its planning policy such as economic aspirations, provision of affordable homes and a mix of homes to meet local needs. Therefore, TW would advocate there is no need at this time to reconsider the housing requirement. Instead, the Review should focus solely on the reason why the Inspector placed the requirement for a review on the Council, namely to meet its full adopted OAN housing requirement figure over the Plan period.

Furthermore, on a national scale, the Government’s aspiration to deliver 300,000 homes per year target was re-iterated in MHCLG’s “*Planning for the Future*” document, published immediately after the 2020 budget in March which stated the following:

“Reviewing the formula for calculating Local Housing Need – we will introduce a new approach which encourages greater building within and near to urban areas and makes sure the country is **planning for the delivery of 300,000 new homes a year**”. [page 5]

As such, TW would like Wyre Council to pay heed to the Government’s direction of travel and play its part in delivering the stated ambition of boosting the supply of housing to help address the national housing crisis.

Policy LPR1 – Wyre Local Plan Review

Update of Objectively Assessed Need [OAN]

There is a clear requirement to review policies relating to overall housing provision to ensure that the WLPR meets the housing needs for Wyre in full. It is imperative that the Council is supportive of delivering a higher quantum of development, above its identified requirement to enable it to meet its OAN in full. This will ensure that the WCLP is positively prepared.

The WCLP currently makes provision for 96% of the identified housing OAN and this equates to 460 dwellings per annum [dpa] rather than 479 dpa. TW understands that the evidence base for the WCLP recommended an OAN range of between 400dpa and 479dpa and that the proposed figure is based on the 2016 SHMA which recommended that the OAN is at the upper end of the range. This was in order to

mitigate the risks associated with a declining working age population and supporting higher levels of affordable housing delivery. The SHMA also sets out the need to provide a net 134 affordable dwellings per annum within the first five years and 189 affordable homes beyond this.

With regards to the Inspector's Report, it is evident that the WCLP did not meet the full objectively assessed need in Wyre. The Inspector considered there to be a need for an early review of housing provision to ensure OAN is met in full over the Plan period rather than as a mechanism to pursue an alternative approach. The Inspector's Report (§64) makes it clear that the OAN figure of 479 dpa is justified and notes that the Government is reviewing the calculation for the current standard method (although not relevant under the 2012 Framework) to take account of the objective of ensuring 300,000 homes are built each year.

If Wyre Council were to utilise the Government's current standard method calculation, this would result in a LHN of 304 dpa, which is a reduction of 172 dpa when compared to the adopted figure. This is a significant reduction and one which would likely impact the overall objectives and vision which underpins the WCLP. Section 3 of the WCLP sets out its Vision and Objectives for the borough, including "*being recognised as an aspirational place with a clear focus on delivering sustainable growth*". It is important that the Council, within the Review, ensures that its housing requirement fully supports the WCLP objectives as reducing the housing requirement will have a knock-on impact in respect of associated growth for the area.

As noted above, it is likely that the Government will soon release an updated standard method calculation, therefore any consideration of pursuing a lower figure (in line with the LHN) would be premature, would not be in accordance with the central theme of the Framework or the wider aspirations from the Government to achieve a high level of housing delivery.

Notwithstanding any potential changes, the Framework is clear that this is "minimum starting point" and other issues, such as economic growth, worsening market signals and Wyre specific considerations such as an ageing baseline population should also be taken account. Wyre's 2019 affordability ratio is 6.04³ compared to the north west average of 5.89 which shows a high level of affordability particularly when one considers that banks apply a ratio of approximately 4 when assessing the size of mortgage it will grant, compared to income.

There is a clear link between worsening affordability and low levels of housing and unless Wyre commit to delivering a higher level of housing, its affordability issues are likely to remain or even worsen. TW would note that suppressing the housing requirement by pursuing the minimum LHN from the standard method cannot be justified, rather the Council should be looking to support higher level of housing delivery in sustainable locations where it can. Similarly, in order to achieve the economic aspirations set out within the WCLP, and meet the current affordable housing targets, the LHN figure would not be sufficient to support this.

TW would therefore expect to see the Council looking to achieve the upper end of their OAN i.e. 479 dpa and not use this as an opportunity simply to reduce their housing figure without considering the knock-on implications in terms of affordable housing delivery and ability to meet the Council's stated economic ambitions for the plan period. TW welcomes that throughout the preparation of the WCLP, the Council recognised that in order to support economic growth sustainably, there was a need to increase the level of housing provided above the LHN which was detailed in the Strategic Housing Market Assessment [SHMA] 2016. TW would therefore expect the Council to take a similar approach to the WLPR in order to meet its OAN in full. Alongside this it is expected that the Council will provide an updated SHMA as part of the WLPR.

³ ONS (2020): Median Housing affordability ratio by local authority district, England and Wales, 2019

In undertaking the WLPR, the Council should also seek to ensure that any remaining unmet need is met within the Housing Market Area through effective cooperation and a robust duty to cooperate strategy. TW is aware that Fylde is also in the process of undertaking a review of its Local Plan, to take into account potential unmet need within Wyre, and therefore the Council should maximise this opportunity and ensure it fully engages with Fylde on this matter.

TW would also expect that alongside working with neighbouring authorities, the Council will undertake to test delivering a higher proportion of the unmet need within Wyre itself. TW would expect that the Council would test a range of scenarios for delivering the full OAN itself, including directing development towards the more sustainable settlements to deliver more of its housing need.

A review of transport and highway issues

TW undertook its own highways analysis as part of its representation at the Examination stage. This is not re-appended here as it is now time-expired. However, the analysis highlighted that the Council's assumptions on the scale of the highway constraints were overstated, this was also reiterated by the Inspector in §19 of the Inspector's Report. The analysis TW undertook set out that the highway network could accommodate additional traffic movements, above that being planned for (i.e. the reduced OAN) without causing a severe impact on the highway network. As such, TW considers that the scope of this element will need to include sufficient, robust and up-to-date capacity modelling. TW also set out that it did not consider that the Council's evidence considered in detail if large scale infrastructure improvements could be put in place to alleviate the highway capacity concerns, which will also need to be addressed.

Notwithstanding the comments on the robustness of the previous modelling put forward by the Council, TW is aware that a number of infrastructure schemes have progressed since the adoption of the Local Plan. Lancashire County Highways (who undertook the assessment on the Council's behalf) did not take account of major highway improvements such as the opening of the Broughton Bypass and other schemes including the committed highway improvement schemes within the IDP, the Poulton-le-Fylde Highway Mitigation Strategy, A6 Corridor Mitigation Strategy and other off-site improvements. These, and any others, should be incorporated into the modelling.

TW would also expect the Council to review opportunities for proposed allocations (both existing or additional, as required) to deliver the necessary infrastructure through developer obligations. Again, this was not addressed as part of the initial Local Plan preparation.

It will be important that the review considers not just those schemes that have been delivered, but also those that will be delivered over the Plan period. These are likely to have an impact on the highway's capacity in the Plan Period. Furthermore, additional mitigation measures could be delivered by future planned developments as part of off-site highway improvements. These improvements could be delivered via S.278 works and significantly improve the highway capacity. Again, TW would expect this to be fully explored by the Council as part of the review and it was noted within the Inspector's Report (§72) that this was missing from the evidence base submitted by the Council in support of the WCLP.

Based on the above, TW would expect to see updated highway capacity analysis submitted alongside this LPR in order to fully assess the current situation in respect of transport and highways concerns. This would allow the Council to understand fully what, if any, additional capacity has become available since adoption of the WCLP and ensure the Council has sufficient infrastructure to meet its OAN in full.

Allocation of sites to meet the objectively assessed housing need

TW acknowledges that revisions to allocations is not to be considered within the scope of the WLPR.

As noted above, TW would expect the Council to review strategies for increasing its allocations to meet its full OAN figure of 479dpa. TW would expect the Council to review the potential for spatial distribution strategies for delivering strategic sites which could also deliver large scale infrastructure improvements to also address the transport and highways issues.

Alongside a consideration of additional housing allocations, TW would expect that the Council fully supports its existing allocations and encourages these to be brought forward within the Plan period. As noted above, TW has an allocation under Policy SA1/14 of the WCLP which is deliverable over the Plan period.

Land at Cockerham Road, Garstang

The Site is allocated under Policy SA1/14 and is identified as having a capacity to deliver 260 units. TW submitted a full planning application on this site for 88 units in February 2020 and see this as the first Phase of the overall development and the catalyst to bring forward the entire allocation. TW considers that the allocation of the Site sees the release of a well contained and logical parcel of land from the open countryside, which presents a good opportunity to delivery a sustainable, residential extension to Garstang.

The planning application highlights TW's commitment to delivering the Site and TW is working proactively with the Council to agree the masterplan for the Site. The planning application sets out that development of the Site is compliant with national and local policy and highlights that there are no overriding technical-or environmental constraints that would preclude the Site from being delivered. The delivery of the Site will make a significant contribution towards meeting the need for market and affordable housing within the borough.

As noted above, given that Wyre is not currently meeting its full OAN, it is imperative that it provides adequate support to enable the delivery of sustainable and viable allocations to come forward within the Plan Period.

Conclusion

TW fully supports the Council in undertaking an early review of its Local Plan to ensure that its OAN (479dpa) is met in full. This was the intention of the Inspector for introducing the need for an early review during the Examination of the Plan. However, TW reiterates the importance of the Council working with neighbouring authorities to meet the figure set out in the WCLP, and not using this as an opportunity to reduce its housing requirement in line with the LHN. There is an overarching national need for housing, and as Wyre Council is pursuing economic growth in region, it is well placed to contribute to this housing need. In addition to this, it is important that the Council brings forward its existing allocations as early as possible to start delivering housing on these sites.

Every avenue should be explored in terms of modes of transport, distribution of units to the most sustainable settlements, mitigation and provision of additional highway infrastructure and large-scale development projects to alleviate the Council's perceived highways constraint as part of this Review to further meet its housing need.

TW considers that the criteria set out within Policy LPR1 provides a good basis for the WLPR to allow the Council to review its supporting evidence base to ensure it meets its full OAN for housing as part of this Review. TW has not made comments on any additional aspects to be included as part of the scope at this point but reserves the right to address the contents of the Local Plan Review and associated evidence base as it emerges.


TW requests that its comments set out within this letter are taken into account by the Council when undertaking the WLPR. TW welcomes further engagement with the Council as the WLPR progresses.



Yours faithfully


Senior Planner

Copy

-  - Taylor Wimpey UK Limited
-  - Taylor Wimpey UK Limited
-  - Taylor Wimpey UK Limited

Appendix P – Consultee 14 (Marine Management Organisation)

Subject: FW: Regulation 18 Letter
Attachments: 31-03-2020_Wyre-partial-review-scoping-consultation_CG.docx

From: [REDACTED]@marinemanagement.org.uk>
Sent: 31 March 2020 09:51
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc: SM-MMO-Consultations (MMO) <Consultations.MMO@marinemanagement.org.uk>
Subject: RE: Regulation 18 Letter

Dear Wyre planning policy team,

Many thanks for the opportunity to respond to your scoping consultation on the Wyre Local Plan partial review.

Please find the response from the Marine Management Organisation attached.

Kind regards,

[REDACTED] MSc LLB | Marine Planner (North West) | Marine Management Organisation | HM Government
Email: [REDACTED]@marinemanagement.org.uk | Direct line: [REDACTED] | Int: 73624 | Mobile: [REDACTED]
[REDACTED]
Address: MMO Lutra House, Dodd Way, Walton Summit, Bamber Bridge, Preston, PR5 8BX

[Website](#) | [EMP \(GIS Portal\)](#) | [Twitter](#) | [Facebook](#) | [Linkedin](#) | [Blog](#) | [Instagram](#) | [Flickr](#) | [YouTube](#) | [Pinterest](#)

The **public consultation** on the [draft North East](#), [draft North West](#), [draft South East](#) and [draft South West](#) Marine Plans is open until 20 April 2020 (extended from original closing date of 6 April). Make your representations by following the links.

Explore Marine Plans - [EMP \(digital service\)](#)

To receive marine planning updates and our newsletter enter your details [here](#)

During the current health emergency, the Marine Management Organisation is continuing to provide vital services and support to our customers and stakeholders. We are in the main working remotely, in line with the latest advice from Government, and continue to be contactable by email, phone and on-line. Please keep in touch with us and let us know how we can help you <http://www.gov.uk/mmo>



Marine
Management
Organisation

Marine Planning
MMO Preston
Lutra House, Dodd
Way, Bamber Bridge,
PR5 8BX

T +44 0370 850 6506
www.gov.uk/mmo

Wyre Council
Planning Policy
Civic Centre
Breck Road
Poulton le Fylde
FY6 7PU

31st March 2020

Dear Wyre planning policy team,

MMO Marine Planning response to the Scoping Consultation on Wyre Local Plan Partial Review.

Thank you for giving us the opportunity to comment on the Wyre Local Plan Partial Review Scoping Consultation. The comments provided within this letter refer to the document entitled **Wyre Local Plan (2011-2031)**.

Please ensure this response is read in its entirety as specific comments relating to your consultation can be found in the second section of this document.

Part one – Overview of marine planning and Marine Management Organisation functions

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend from the mean high water spring tides mark (which includes the tidal extent of any rivers and estuary) to the inshore (up to 12nm) and offshore (12 to 200nm or the Exclusive Economic Zone) waters; there is an overlap with terrestrial plans which generally extend from the mean low water springs mark.

Marine plans inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the Draft North West Inshore and North West Offshore Marine Plan is of relevance. The North West Marine Plans cover the area from the Solway Firth border with Scotland to the River Dee border with Wales, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the UK Marine Policy Statement (MPS), unless relevant considerations indicate otherwise. The Draft North West



Inshore and North West Offshore Marine Plan is now a material consideration. As with terrestrial local plans, weighting of draft marine plan policies is covered by paragraph 48 of the National Planning Policy Framework 2019 (NPPF).

Part 2 - Specific comments relating to your consultation

Within the document **Wyre Local Plan (2011-2031)**, we recommend reference to the **legal duty to co-operate with the Marine Management Organisation**, as well as reference to **Marine Planning**, the **Marine Policy Statement**, and the Draft North West Marine Plan which is currently out to public consultation and therefore a material consideration.

The following policy topics within the Draft North West Marine Plan have been identified after reading the Wyre Local Plan document. They are provided only as a recommendation and we suggest your own interpretation of the Draft North West Marine Plan is completed.

- Fisheries
- Ports, harbours and shipping
- Employment
- Tourism and recreation
- Biodiversity
- Marine Protected Areas
- Seascape and landscape
- Climate change
- Heritage assets

The marine planning remit is directly for coastal and marine waters up to the mean high water spring mark where Wyre council extends to the mean low water spring mark (we can supply a GIS layer of the spatial extent for any policy maps if you wish). The area covered by the Wyre Local Plan lies within the North West Marine Plan Area, therefore, it is recommended to ensure your plan is 'sound' that it includes a reference to the Draft North West Marine Plan.

You may find our online guidance, our online Explore Marine Plans System and the Planning Advisory Service soundness self-assessment checklist helpful in completing your interpretation.

Once again, thank you for providing the opportunity to comment.

Yours sincerely,



Marine Planner (North West)

Telephone: 0208 720 3624

Mobile: 

E-mail: @marinemanagement.org.uk

Appendix Q – Consultee 15 (Natural England)

Subject: FW: Regulation 18 Letter
Attachments: NE response to Reg 18 scoping letter.pdf

From: [REDACTED]@naturalengland.org.uk
Sent: 23 March 2020 14:52
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: RE: Regulation 18 Letter

**Public Consultation. Regulation 18.
The Town and Country Planning (Local Planning) (England) Regulations 2012 No 767 Part 6 (as amended)
Wyre Local Plan to 2031 Partial Review Scoping Consultation**

Please find attached Natural England's response to the above planning consultation.

[REDACTED]
Lead Advisor, Planning Casework
Coast and Marine Team
Cheshire, Grtr Manchester, Merseyside & Lancashire Area Team
Natural England
2nd Floor, Arndale House
Manchester, M4 3AQ
Tel: 0208 225 7506

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Date: 23 March 2020
Our ref: 310571



Planning Policy
Wyre Borough Council

Customer Services
Hombeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

planning.policy@wyre.gov.uk

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam

**Public Consultation. Regulation 18.
The Town and Country Planning (Local Planning) (England) Regulations 2012 No 767 Part 6
(as amended)
Wyre Local Plan to 2031 Partial Review Scoping Consultation**

Thank you for your consultation on the above dated and received by Natural England on 28 February 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We agree with the proposed scope of the partial review of Wyre Local Plan to 2031 as detailed in the letter dated 28 February 2020. In addition, the Council should also review the Habitats Regulations Assessment and all other environmental reports/assessments associated with the local plan.

If you have any queries relating to the advice in this letter please contact me on 0208 225 7506.

Yours faithfully

A redacted signature, appearing as a solid black horizontal bar.

Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

**Appendix R – Duty to Co-operate Letter to Fylde Borough Council, Wyre Council, 6
March 2020**

By Email Only:

info@fyldelocalplan.gov.uk; and
consultations@fyldelocalplan.gov.uk

Ask for: ~~01253 891000~~
Email: ~~01253 891000~~@wyre.gov.uk
Tel No: ~~01253 891000~~
Our Ref: DtC

Date: 6 March 2020

Dear ~~01253 891000~~

Duty to Cooperate and the Partial Review of the Fylde Local Plan to 2032

Thank you for providing Wyre Council, alongside other statutory consultees, with a pre-consultation version of a number of documents relating to the partial review of the Fylde Local Plan to 2032. I have been able to respond on a number of matters through a recent Duty to Cooperate (DtC) meeting, in addition to email exchanges and phone conversations between members of your team and my own. This cooperation has been positive, ongoing and constructive and has resulted in some changes to the documents concerned; particularly the Statement of Common Ground (SoCG).

Despite best endeavours there still remain matters where agreement has not been reached by Friday 28 February 2020. I have sought to respond as quickly as possible given your intention to present your proposed partial review to your Planning Committee on 11 March 2020 for a decision on further progress. It may be of benefit if the contents of this letter are put before your Planning Committee on 11 March 2020.

The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy LPR1, the contents of which are incontestable common ground and the confirmation of un-met housing need within Wyre, again incontestable common ground. This un-met need provides (in part) the justification for the review of the Fylde Local Plan to 2032 and a strong link between our two plans and their subsequent review.

Policy LRP1 sets out the steps that need to be undertaken as part of Wyre's Local Plan review in order to ascertain what proportion (if any) of the unmet need can be accommodated in Wyre. As set out above, Fylde's Local Plan review is justified in part by a commitment by Fylde to assisting Wyre meet residual unmet need.

It is therefore my view that the matters to be addressed by Policy LPR1 would most comprehensively be dealt with jointly between our respective authorities. That is, it is my view that our authorities should to work together to identify where the unmet need should be accommodated, and our plan processes need to be properly aligned to accommodate this.

As you will be aware, policy LPR 1 indicates that Wyre's Local Plan Review will include an update of Objectively Assessed Housing Needs.

Since the adoption of Wyre's Local Plan, NPPF 2019 has introduced the Standard Methodology for the purpose of determining the minimum number of homes required in the

area for the purpose of strategic policy making. The adopted policy figure in Wyre's plan is higher than the standard methodology figure. Wyre is required, pursuant to policy LRP1, to update its housing needs assessment for the purpose of the review, and it is this process that will determine Wyre's housing need through the Local Plan Review.

Because the evidence base relating to the Objectively Assessed Need (OAN) that informed both our plans was/is shared and was jointly commissioned; namely the Strategic Housing Market Assessment (SHMA), and because Fylde is considering its own housing needs through its own review, I consider that housing need is an issue that should be jointly considered by our authorities.

Policy LPR1 also requires a review of transport and highway issues, taking into account the matters specified in the policy. Similarly any review of the transport and highways infrastructure matters affecting Wyre could be dealt with jointly given the cross-boundary nature of the road network (both local and strategic), and also given that the outcome of the assessment will assist in informing the authorities of the degree to which Fylde may need to assist Wyre in meeting any unmet needs that cannot be accommodated in Wyre.

I would therefore like to propose that we agree to jointly review the above matters to further inform the partial review of both our plans, providing the opportunity to achieve a consistency of approach between our two authorities and their plans. In my view this is the best way to review our respective plans for our shared housing market area, and to ensure that housing needs are properly planned for and met across the HMA.

I also consider that an alignment of plan making timescales with the potential to more effectively deal with the matter of un-met housing need should be considered.

In the coming weeks I will be seeking quotations from Turley and Lichfields who both provided evidence for the WLP31, and in the case of Turley the SHMA that we both share. I would very much like to include cross boundary assessments of need as part of this/these commission(s) and I await your response to my proposal so that this evidence gathering can begin expediently. I will also be happy to discuss a common plan making timetable with you.

For the avoidance of doubt the full OAN for housing in Wyre is 479 dpa, with the WLP31 providing only 460 dpa; thus establishing the un-met housing need as a matter of recently adopted policy. The housing requirement for Wyre can only be changed through the adoption of a reviewed local plan or through an entirely new local plan. Although the Government has introduced a Standard Method (SM) for the calculation of housing need, this is a starting point and it cannot be assumed that this will represent the final position for Wyre. Therefore we do not consider that reference to potential OANs or housing need figures for Wyre in any of the documents produced as part of your partial review can be accorded any weight at this stage. As set out above, we would however welcome the opportunity to work with you to undertake joint needs assessments for the purpose of our respective Local Plan reviews.

One final matter that I wish to draw your attention to is the fact that it cannot be assumed that Wyre Council, through the partial review process, will be able to meet housing needs in full within the Borough. The Inspector's Report into Wyre's Local Plan made it clear that further consideration needed to be given as to the extent to which any unmet need could be met in Wyre through a review of transport and highway issues. This is reflected in LRP1 (2). Until detailed consideration has been given to this issue through the review process, it has not been established that Wyre can meet any unmet needs within the Borough. Again, we would welcome the opportunity to work with you to undertake a joint review of transport and highway issues to ensure that housing needs are accounted for and met across the HMA.

Finally, I note that Wyre Council are currently consulting on the scope of a partial review. We will continue to seek to discuss any matters arising from that consultation with you in a positive and constructive way.

As always should you wish to discuss the content of this letter further, please do not hesitate to contact myself or indeed any other member of my team. I look forward to continuing the meaningful and ongoing engagement we have.

Regards



Planning Policy and Economic Development Manager

Appendix S – Duty to Co-operate Response from Fylde Borough Council, Fylde Borough Council, 24 March 2020



[REDACTED]

Wyre Council
Civic Centre, Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Our Ref:

Your Ref:

Please Ask For: [REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]@fylde.gov.uk

Date: 24th March 2020

Dear [REDACTED]

Duty to Cooperate and the Partial Review of the Fylde Local Plan to 2032

Thank you for your letter of 6th March 2020 which provides follow up to the earlier email exchanges, telephone conversations and proceedings at the Duty to Co-Operate meeting of 10th February 2020, in relation to our Partial Review and in particular to our Draft Statement of Common Ground.

Fylde Council is grateful for the expression of support, within the opening paragraph of your letter, for the co-operation that has been undertaken between the Councils in support of the Partial Review of the Fylde Local Plan to 2032. We would in turn like to express thanks for the efforts made by Wyre Council, in particular the time spent by you and your staff, in responding to our Draft Statement of Common Ground through a number of iterations and helping reach a common understanding of our respective positions. Fylde Council would wish to express a commitment to a similar level of effort in engagement with Wyre Council to assist you in the preparation of any Partial Review documents as you require and we will, of course, continue to engage with Wyre Council concerning issues remaining or arising within our Partial Review documents, including those raised elsewhere in your letter.

Fylde Council welcomes the letter in providing clarification as to the “direction of travel” of Wyre Council in relation to the strategic matter of housing need, and expresses thanks for the invitation being made at an early stage of Wyre Council’s plan-making process to work jointly, with an amended timetable for Fylde. Whilst Fylde Council does not wish to commit at this stage to the joint commissioning of supporting documents in relation to housing need and highways and transport capacity, we would wish to keep this matter under review, recognising that the Partial Review of the Wyre Local Plan (2011-2031) remains at its earliest stages.

Fylde Council will commit to engagement with consultants undertaking work that is commissioned by Wyre Council as necessary in support of such work. We will engage supportively with Wyre Council in the bringing forward of its Partial Review through ongoing consideration of strategic cross-boundary matters, under the auspices of the Duty to Co-Operate Memorandum of Understanding between the Fylde Coast Authorities and Lancashire County Council.

We look forward to continued positive engagement in respect of our respective plans. Please feel free to contact me at any time for any further clarification or assistance.

In line with current MHCLG advice, we propose to continue with the review process as best we can, but obviously, given current uncertainties, our original timetable will need to be reviewed.

Yours sincerely,



Planning Policy Manager

Appendix T – Schedule of Consultees

Associated British Ports
Avison Young
Barnacre - Planning Ambassador
Barnacre with Bonds Parish Council
Barratt Homes
Barrow Borough Council
Barton Grange
Barton parish council
Barton Willmore
Baxter Group Limited
Bell Ingram
Bellway Homes Ltd
Bilsborrow Post Office & Village Stores
Blackpool Council
Blackpool Transport
Bleasdale Parish Council
Bowland Forest (Higher) Parish Council
Breck Primary School
Broadgrove Planning and Development Ltd
BT
Burlingham Park Ltd
Cabus Parish Council
Cadent Gas Limited
Cardinal Allen Catholic High School
Carleton St. Hilda's Church of England Primary School
Carr Head Primary School
Cass Associates Ltd
Central Lancashire Friends of the Earth
Chipping Parish Council
CLA
Claughton-on-Brock Parish Council
Countryside Properties
De Pol Associates
DfE
EE
Electricity NW
Ellel Parish Council

Elswick Parish Council
Emery Planning
Environment Agency
Fleetwood Civic Society
Fleetwood Parish Council
Fleetwood Town Council
Forest of Bowland Area of Outstanding Natural Beauty Partnership
Forton Parish Council
Forton Women's Institute
Fox Planning Consultancy
Frank Harrington Associates
Frost Planning Ltd
Fylde Council
Garstang Parish Council
garstang ramblers
Garstang Town Council
Graham Anthony Associates
Great Eccleston & District Agricultural Society
Great Eccleston Parish Council
Greater Preston CCG
Hambleton Parish Council
Head of Enterprise Zones (Blackpool Council)
Health and Safety Executive
Highways England
Historic England
Hollins Strategic Land
HollisVincent
Home Builders Federation (HBF)
Homes and Communities Agency
Homes England
Ingle's Dawndew Salad Ltd
inskip-with-sowerby parish council
jennifer Lampert Associates Ltd
JWPC Ltd

Kirkland Parish Council
Lancashire County Council Planning Group
Lancashire Association Of Parish & Town Councils Wyre Area Committee
Lancashire Constabulary
Lancashire County Council
Lancashire County Council Highways
Lancashire County Council, Public Health
Lancashire Enterprise Partnership Ltd
Lancashire Fire & Rescue Service
Lancashire Mind
Lancashire North CCG
Lancashire Public Health
Lancashire Wildlife Trust
Lancashire Wildlife Trust
Lancaster City Council
LCC
LCC & Local MP
Lead Local Flood Authority
Lichfields
Little Eccleston with Larbreck Parish Council
M.O.D.
Marine Management Organisation
Marrons Planning
Maybern Planning and Development
Member of Parliament for Blackpool North and Cleveleys
Member of Parliament for Wyre and Preston North
Moris Homes
Mosaic Town Planning
MP
My Neighbourhood Plan
Myerscough and Bilsborrow Parish Council

Myerscough College
N Vision. Blackpool, Fylde and Wyre Society for the Blind
Nateby parish council
National Grid
NATS
Natural England
Nether Wyresdale Parish Council
Nether Wyresdale Parish Council, Nateby Parish Council, Winmarleigh Parish Council & Cockerham Parish Council
Network Rail
Nexus Planning
NFU North West
NORTH & WESTERN LANCASHIRE CHAMBER OF COMMERCE
NORTHERN EDGE LIMITED
Northern Trust
NPL Group
Office of Rail and Road
Office of the Police and Crime Commissioner
Open Reach
Out Rawcliffe Parish Council, Upper Rawcliffe with Tarnacre Parish Council
Over Wyresdale Parish Council
Overton Parish Council
Persimmon Homes Lancashire
Peter Brett Associates

Catterall Parish Council
Kirkland Parish Council
Pilling Parish Council
Plainview Planning
Poulton-le-Fylde Historical & Civic Society
Stalmine-with-Staynall Parish Council
Preesall Town Council
Preston City Council
Preston City Council Rural North Ward
Property Capital plc
PWA Planning
R & D Gregory
RC Church
Redrow Homes Ltd
Regenda Group
Ribble Valley Borough Council
Richrad Turner & Son
Rossall School
Rowland Homes
Royal Society for the Protection of Birds (RSPB)
Savills (UK) Ltd
Scorton Residents' Association
Sedgewick Associates
Shepherd Planning
Singleton Estates Ltd
Singleton Parish Council
Smith & Love Planning Consultants
Sport England
SSA Planning Limited
St Mary's Catholic Primary School Great Eccleston

St Wulstan and Edmund, Fleetwood, Lancashire
Staining Parish Council
Stalmine Parish
Stalmine-with-Staynall Residents' Association
Steven Abbott Associates
Story Homes
Superdrott Plant Hire
Tetlow King Planning Ltd
The Coal Authority
The Gardens Trust
The Strategic Land Group
The Strategic Land Group Ltd
Theatres Trust
Thornton Action Group
Three
Thurnham with Glasson Parish Council
Treales Roseacre & Wharles Parish Council
Turley
United Utilities
Upper Rawcliffe with Tarnacre Parish Council
Vinnolit Hillhouse Limited
Wainhomes (North West) Limited
Walton & Co (Planning Lawyers) Limited
Winmarleigh Parish
Woodland Trust
Woodplumpton Parish Council
WYG
Wyre Labour Group (if stated as such)
YMCA Fylde Coast