Hollins Strategic Land

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only:	Date Received	24/10/18	Rep. No.	0358/M/01-05/B1,C

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?

Yes ☑ No ☐ 0358/M/01/B1

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

N/A.

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation.

Main Modification Reference	MM/022, MM/047, MM/083 + MM/090.

Paragraph or Policy Reference	SEE CONSULTATION STATEMENT.

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☑

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If YES please provide additional information below if you wish. If NO please answer question 3b.

n/a.

Please fill out Part F if you need additional space

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☑

Not justified ☑

Not effective ☑

Not consistent with national planning policy ☑

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Please provide precise details of why you believe this Main Modification is not sound:

SEE CONSULTATION STATEMENT.

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

SEE CONSULTATION STATEMENT.

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PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below.

N/A.

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes ☑ No ☐

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

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Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

To continue discussions regarding the main modifications referred to in the Consultation Statement.

Please fill out Part F if you need additional space

Submitting your representation

Representations can be submitted using the on-line form which can be accessed and completed on-line at www.wyre.gov.uk/localplan

The representation form can also be downloaded from www.wyre.gov.uk/localplan

The completed form can be submitted by:

e-mail at planning.policy@wyre.gov.uk or
Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

If you would like assistance in completing your representation or have any other questions about the emerging Wyre Local Plan, please contact the Planning Policy Team by e-mail planning.policy@wyre.gov.uk or by telephone on 01253 887235 or 01253 887231. Forms **must be received by 5pm on 24 October 2018. Late representations CANNOT be accepted.**

In submitting the form, you understand that the information given is to the best of your knowledge correct.

0358/ M/01-05/ B1,C

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Main Modifications

Consultation Statement

Hollins Strategic Land

October 2018

1 Introduction

1.1 This Consultation Statement (CS) provides comments on the following Main Modifications:

- MM022 Housing Land Supply;
- MM047 Masterplan Guidance;
- MM083 Forton Extension; and,
- MM090 Local Plan Review.

1.2 It is demonstrated that it is necessary for the Council to make significant modifications to the Local Plan for it to be found sound, including:

- the windfall allowance must be reduced/removed due to highways capacity constraints;
- the Masterplan requirement for SA1 and SA3 sites must be removed or significantly reduced to ensure a deliverable and developable housing land supply;
- policy SA3/4 and its associated Key Development Considerations must be amended in order to achieve positive planning.

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2 MM022 Housing Land Supply

0358/n/02/c

2.1 MM022 sets out modifications relating to several housing land supply (HLS) matters, including:

- the adoption of a windfall allowance of 50 dwellings per annum (dpa) from 01/04/2021;
- the identification of a HLS of 9285 dwellings over the plan period and a statement that "*there is no planning barrier to the early delivery of sites if circumstances and market conditions allow*";
- the adoption of the Liverpool Method for calculating the 5-year HLS.

Windfall Allowance

2.2 The Council seeks to adopt a windfall allowance of 50 dpa after 31/03/2018. This follows the Inspector's Post Hearing Advice, which stated that "*there is a justification for a windfall allowance within the range of 25-50 dpa*" (para. 20), based on the assessment of completions on non-allocated housing sites of less than 25 dwellings since 01/04/20111 (EL5.012).

2.3 It is acknowledged that document EL5.012 provides evidence which demonstrates significant housing completions on non-allocated sites. However, the permissions will have been granted on the basis of the NPPF tilted balance; the Council did not have an up to date plan or a 5-year HLS for a number of years.

2.4 Furthermore, the emerging Local Plan (eLP) states that it cannot provide its full housing need primarily because of highways capacity issues. There were no such highways capacity issues between 2011/12 and 2017/18. Once adopted, the eLP will have allocated as much land for housing as is possible without there being a severe impact on the highway network. It is therefore considered likely that LCC Highways will object to the windfall schemes during the application processes. The Council must demonstrate whether this is likely, by obtaining a response on the matter from LCC Highways.

2.5 It is for these reasons that Hollins Strategic Land (HSL) considers the windfall allowance should be removed or significantly reduced, at least to 25. This would result in the HLS for the plan period falling and the 5-year supply becoming even more fragile than it already is, but it is considered the realistic approach.

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2.6 Of course, if there is scope for 50 dpa to come forward on sites right across the Borough without a severe impact on highways, there must be scope for the LPA to allocate further land and secure housing in a more efficient, positive and plan-led manner.

5-year Housing Land Supply

2.7 The Council's response to the Inspector's Post Hearing Advice states that the eLP can provide a deliverable HLS of 5.19 years. This equates to only 127 dwellings more than is required and is fragile.

2.8 Furthermore, it is evident that the supply should be reduced for a number of reasons, including:

- Windfall allowance; and,
- Masterplan requirement of policies SA1 and SA3.

Windfall Allowance

2.9 As previously stated, HSL considers that the windfall allowance should be removed or significantly reduced. If it is removed, the HLS reduces to only 5.05 years. If it is reduced to 25 dpa (despite there being significant highways constraints until such time as the LP is reviewed), the supply reduces to only 5.12 years.

Masterplan requirement of policies SA1 and SA3

2.10 The eLP states that "*there is a requirement for the preparation of a Masterplan with regards to sites in Policies SA1 and SA3 proposing more than 50 dwellings*" (para. 9.1.5). MM047 states that the Council will publish guidance on the masterplanning process. However, the Council has recently produced a document entitled 'Guidance on the Preparation of Masterplans' (GPM) (September 2018). This does not feature in the examination library despite the Council informing the Inspector that the draft version would have been made available shortly after the Hearing Sessions finished. The GPM is appended[1] so that the Inspector can consider the full implications of the masterplanning requirement for SA1 and SA3.

2.11 Upon review, it is evident that the GPM places significant requirements on developers and/or land owners of allocated sites. The Council states that it will act as facilitator for the Masterplanning process, but it will not contribute to the costs involved and will require the process to be led by developers/land owners.

[1] Appendix 1: Guidance on the Preparation of Masterplans

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2.12 The GPM requires that the process involves written text and visual material "*supported by a series of technical studies*". It also requires engagement with stakeholders and consultation with the local community as an essential part of the process. The GPM then continues to state that more complex masterplans will be managed by two groups: a landowners group and a stakeholders group. Following all of this, the Masterplan must be produced and approved by the Planning Policy Working Group.

2.13 The costs involved in this process are significant. For example, the production of a series of detailed technical studies to inform a Forton Extension Masterplan would cost approximately £119,250.

Report	Fee estimate
Topographical Survey	£4,950
Ground and Utilities	£5,300
Air Quality*	£5,000
Noise	£4,000
Landscape and Visual Assessment	£7,000
Ecological Survey	£10,000
Tree Survey	£2,000
Flood Risk Assessment and Drainage Strategy	£27,000
Transport Assessment	£52,000
Heritage Statement*	£2,000
TOTAL	**£119,250**

*Fee estimated by HSL

2.14 This is considered excessive and a much more cost-effective Masterplan could be produced in a timelier manner which would still be capable of achieving good place making. This approximate cost does not allow for project management, consultation with the community/stakeholders, or the production of the Masterplan document; a planning consultancy has provided HSL with a quote and this could add another £60,000 to cost of the technical studies. For some landowners who do not have developer backing, the total cost of c. £179,250 could be prohibitive.

2.15 In addition to the cost, the masterplanning process required by the GPM would take a significant amount of time and would undoubtedly slow down housing delivery across the Borough. Document EL8.005 'Housing Implementation Strategy' states that the housing trajectory allows for the masterplanning process. However, HSL considers that the delays caused by the GPM have been underestimated.

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2.16 HSL considers the following timetable provides realistic assumptions for the preparation of a GPM compliant masterplan following adoption of the eLP in March 2019:

Action	No. of months required	Date completed
Initial landowners meeting	3	June 2019
Agreeing fee apportionment	2	August 2019
Appointing project manager for landowners	2	October 2019
Appointing consultants for technical studies	2	December 2019
Undertaking technical studies	3	March 2020
Developing initial framework masterplan	1	April 2020
Landowners meeting to discuss framework masterplan	1	May 2020
Landowners meeting with Council and Stakeholders Group to discuss framework masterplan	3	August 2020
Landowners meeting to discuss feedback and agree way forward	2	October 2020
Production of Masterplan	3	January 2021
Consultation with Council and Stakeholders Group and Community	3	April 2021
Landowners meeting to discuss feedback and agree way forward	2	June 2021
Finalise Masterplan and reach landowner and Stakeholder agreement on final version	3	September 2021
Planning Policy Working Group Approval Process	3	December 2021

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2.17 This timetable does not allow fully for landowner conflict, which is immeasurable and could further delay the production of the Masterplan. However, assuming the timetable is achievable, applications for planning permission would not be submitted until perhaps March 2022.

Action	No. of months required	Date completed
Submission of application for outline permission	3	March 2022
Approval of outline permission	6	September 2022
Submission of Reserved Matters application	6	March 2023
Approval of RM application	4	July 2023
Discharge pre-commencement conditions and **commence on site**	6	**January 2024**

2.18 Document EL8.005 states that development at the Forton Extension and land south of Blackpool Road, Poulton le Fylde, for example, will commence in 2021/22. It states that development will commence on the South Stalmine extension and the Inskip extension in 2022/23. If development on these four sites alone is reasonably pushed back to 2023/24, 160 dwellings are removed from the 5-year HLS.

Plan Period Housing Land Supply

2.19 The aforementioned GPM masterplanning process would also have a knock-on effect on the HLS for the overall plan period. Taking the Forton, Poulton le Fylde, Stalmine and Inskip extensions as an example again, 90 dwellings would move beyond the plan period further impacting on the Council's ability to deliver its housing need.

Summary

2.20 The eLP states that "*there is no planning barrier to the early delivery of sites if circumstances and market conditions allow*". However, it is evident that the masterplanning requirements of the GPM would significantly impact upon the Council's 5-year housing land supply and the delivery of its housing need across the plan period.

2.21 The Inspector has confirmed that the Council has persistently under-delivered for a number of years. It is considered vital that the Council takes the opportunity to deliver housing as quickly as possible in order to respond to the persistent under-delivery and

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to ensure as much of the Council's housing need can be delivered during the plan period. To do this, the Council must remove the Masterplanning requirement wherever possible and/or significantly reduce the GPM requirements.

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3 MM047 Masterplan Guidance 0358/a/03/c

3.1 HSL has previously promoted the removal of the masterplanning requirement for the Forton Extension (SA3/4). This was without having sight of the GPM, which was published following the eLP Hearing Sessions. The comments in the previous section of this CS set out why the GPM will act as a barrier to housing delivery during the initial 5-year period and across the plan period.

3.2 HSL has an application pending for outline permission for 210 dwellings and a neighbourhood centre on land north and south of School Lane, Forton. Having acquired an interest in the site in 2017, HSL is keen to deliver housing in Forton as soon as possible. The application was validated in May 2018 and the proposals would not prejudice the delivery of the Forton Extension. The LPA has informed HSL that any application would not be approved until a Masterplan has been adopted.

3.3 As noted in the previous section of this CS, this could reasonably take until December 2021 if the GPM is followed. HSL has project managed the production of a more cost-effective Masterplan that can achieve good place making and importantly, can deliver housing much earlier in the plan period. The Masterplan is appended[2].

3.4 The Council arranged a landowners meeting for Forton Extension landowners in February 2018[3]. Since that meeting, HSL has sought to drive the masterplanning process forward, despite considering it unnecessary, in an attempt to deliver housing in Forton as quickly as possible.

3.5 The Inspector's Post Hearing Advice made the process simpler, due to the removal of Parcels E and F[4]. Previously, too much land had been allocated for the maximum 468 dwellings sought by the Council. Parcels A – D are not capable of providing the maximum 468 and so the apportionment of development is a simpler exercise. Nevertheless, there remain significant issues that have delayed progress.

3.6 As previously stated, the technical studies required by the LPA for the Forton Extension Masterplan would have cost in the region of £119,250. Neither Parcel B nor D could contribute to this. Parcel B is the Village Hall Committee and does not have the funds to contribute to a masterplan process that will not result in their site being developed, other than for a link road. Parcel D does not have an access and is reliant upon the link road through Parcels A and B, across Winder Lane and across Parcel C; until such

[2] Appendix 2: Forton Masterplan

[3] Representatives for Parcels A – F attended the meeting

[4] Appendix 3: Land Parcels

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time as an access is secured, Parcel D cannot risk significant outlay[5]. The entire cost could not reasonably be absorbed by Parcels A and C.

3.7 HSL subsequently met with representatives of Parcels C and D to discuss how to progress matters, having also spoken with a representative for Parcel E regarding employment provision. It was agreed that a Masterplan could be produced that would achieve good place making but at a manageable and proportionate cost shared between Parcels A and C.

3.8 The Masterplan has been informed by Statements from professional consultants on landscape, ecology, flood risk, drainage, heritage and highways. It demonstrates how the required mix of uses could be developed at the Forton Extension and has the support of Parcels A, C, D and E[6]:

- Parcel A will deliver:
  - 210 dwellings;
  - Neighbourhood centre, comprising:
    - Community hall;
    - Medical facility; and,
    - Convenience store.
  - Significant POS.
- Parcel B will deliver the link road from Parcel A to Winder Lane (it is also possible that Parcel B delivers the community hall and medical facility; this can be resolved in advance of the reserved matters application being submitted for Parcel A)[7];
- Parcel C will deliver 33 dwellings and the link road from Winder Lane to Parcel D;
- Parcel D will deliver:
  - 120 dwellings;
  - POS provision; and,
  - 0.8ha of land for the school extension[8].
- Parcel E will deliver 1ha of employment land in the location suggested by the eLP Inspector.

3.9 The appended Masterplan demonstrates that good place making can be achieved without adhering to the excessive requirements of the GPM. Given the importance of

[5] The access to Parcel D could of course further delay the timetable set out in section 2 of this CS

[6] Parcel B has not been consulted during the masterplanning process. It is anticipated that the Village Hall committee can provide comments during the pending application process for Parcel A.

[7] Should Parcel B decide not to provide the Link Road, alternative access(es) to Parcel D will be proposed at a later stage, in line with para. 7.1 of the GPM.

[8] The school extension can be delivered when Parcel D is developed and temporary measures put in place until such time, as suggested by LCC Education during the LP Hearing Sessions. This would also be compliant with para. 7.1 of the GPM

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delivering housing in Wyre as soon as possible, it is considered that the eLP must be amended to allow for such a Masterplan to be sufficient. To do otherwise would not represent positive planning.

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4 MM083 Forton Extension

0358/m/004/C

4.1 HSL supports the allocation of the Forton Extension, is keen for delivery to take place as quickly as possible in the plan period and for the developable area to be maximised.

Site Area

4.2 HSL considers that this should be extended to 20.50 ha, to incorporate 1ha of land within Parcel E. For the reasons set out in section 3 of this Statement and in the appended Masterplan, HSL considers that the 1ha of employment should be located in Parcel E. The Council should take advantage of a willing land owner who would like to provide employment development as well as the subsequent benefit of releasing 1ha of land within Parcel A for c. 30 dwellings.

Use

4.3 The policy requires that the Forton Extension provides a community hall, convenience store and medical facility, as well as a school extension. This should be clarified under 'Use'.

Housing Capacity

4.4 The appended Masterplan has demonstrated that the Forton Extension can accommodate c. 363 dwellings while achieving good place making. Policy SA3/4 should confirm that this level of housing can be achieved, as a minimum.

Site Delivery

4.5 Section 2 of this Statement has demonstrated that the Forton Extension will not be fully delivered during the plan period if the Council imposes the requirements of the GPM. It is considered that the Council must either:

- Acknowledge the potential for significant delay resulting from the GPM requirements and duly amend the 'Site Delivery' section to confirm that it will not be possible to provide the entirety of the Forton Extension prior to the end of the plan period; or,
- In the interest of efficient delivery, acknowledge that the GPM requirements can be significantly reduced and retain the delivery of the Forton Extension in the plan period.

4.6 It is also considered that delivery could be speeded up even further via an amendment to the Proposals Map to confirm where each of the uses should be located within the Forton Extension. The Council has confirmed that it considers the 1ha of employment should be located within Parcel A (see Key Development Consideration 5) (it should be

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noted that the Council decided this without having undertaken a Masterplan). The appended Masterplan demonstrates that it should be located in Parcel E. The proposals map should confirm the location of the employment land. The Council acknowledges that the school extension should be located in Parcel D. This too can be shown on the Proposals Map. The appended Masterplan demonstrates that the Neighbourhood Centre can be accommodated on Parcel A; this too can be shown on the Proposals Map. The remainder of the Forton Extension allocation can be identified for housing and associated public open space.

4.7 This approach would render the lengthy masterplanning process unnecessary and speed up delivery. It would represent positive planning and allow applications to come forward on each parcel in line with revised Key Development Considerations.

Site description

4.8 This states that the site consists of four parcels of land but this is not obvious from the description or associated plan. For clarity, the parcels (A, B, C, D and E) should be identified.

Key Development Considerations

KDC 1

4.9 For the aforementioned reasons, it is considered that the masterplanning requirement should be removed. If this positive approach is not adopted by the Council, it is considered that the requirements of the GPM must be significantly reduced so that the appended Masterplan could be agreed by the LPA.

4.10 KDC 1 also requires unfettered access between the various parcels. HSL supports this requirement but notes that it is not repeated on other allocations. For consistency, it is considered that this requirement must be rolled out across all allocations.

KDC 3

4.11 This states that "*a landscape buffer along the A6 will be required*". This requirement was initially imposed in response to objections to Parcels E and F being included in the Forton Extension, in order to suggest that those two parcels could be delivered without resulting in Forton merging with Hollins Lane. The Inspector advised that Parcels E and F should be removed from the allocation because of the risk of coalescence and as such, the requirement for a landscape buffer along the A6 is no longer necessary. This is confirmed in the appended Masterplan and to impose such a requirement would unnecessarily further reduce the developable area.

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KDC 4

4.12 This KDC results in further costs and delay to the Masterplanning process by requiring a drainage strategy for the whole Extension to be devised in advance of development being approved. The cost of such an unnecessary exercise is significant. The appended masterplan is informed by Flood Risk/Drainage consultants (Betts Associates) and confirms that KDC 4 cannot be justified.

4.13 The KDC also requires residual surface water to drain to Morecambe Bay via the River Cocker. This requirement is imposed with no supporting evidence and Betts Associates considers that it cannot be justified. It should be removed. Drainage details can be controlled via the planning application process.

KDC 5

4.14 The Council has imposed this requirement without undertaking a masterplanning process and this weakens the Council's case for the GPM process. As previously stated, the 1ha of employment should be located in Parcel E for the reasons set out in the appended Masterplan.

KDC 6

4.15 If KDC 5 can confirm the location of the employment land, it follows that KDC 6 should confirm the location of the school extension land. The council has also confirmed that 0.8ha of land should be made available for the school extension and this could be confirmed in the policy provided it is evidence based. It is understood that LCC Education has confirmed that 0.8ha of land is still required despite the amount of housing falling from 468 to 310 dwellings. However, the basis for this figure has not been provided. It is considered essential that LCC Education justify the amount of land by providing the calculations.

4.16 LCC Education provides consultation responses to applications for outline permissions where the mix of housing is not specified. The responses set out whether a contribution towards school places would be required and are based on the entire development consisting of 4-bedroomed dwellings. It would not be reasonable if this approach has been applied to the Forton Extension.

4.17 At this point, it should be noted that the Inspector asked LCC Education if development could come forward in Forton in advance of the school extension being built. LCC suggested that temporary measures could be put in place for a number of years until such time as Parcel D is developed. It is understood that LCC has since told the LPA that this would not be possible. This has resulted in the LPA stating that it may not be possible for any development to come forward in Forton in advance of the school extension being built. This threatens the delivery of the Forton Extension. Parcel D

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cannot be delivered in its entirety until an access is secured through Parcels A, B and C. As such, contingency measures should be put in place.

4.18 HSL has promoted land north of Forton[9] for development during the eLP process. The land was initially ruled out as the Council thought that high pressure gas pipelines rendered the land undevelopable. The HSE has confirmed that this is not the case. The inclusion of the land north of the village could provide an alternative to Parcel D and would not require a link road through Parcel B. As is proposed for Stalmine, a new school could be created elsewhere in the Forton Extension.

4.19 It is considered that the Council must either:

- Confirm that development can come forward in advance of the School Extension being built; or,
- Allocate land north of Forton as an alternative to Parcel E so that a new school can be provided and the level of housing provision remains at a similar level or increases, benefitting housing delivery across the plan period.

4.20 Of course, there is still an opportunity for the Council to allocate the land north of Forton in any event, to provide much needed additional housing.

KDC 7

4.21 As previously stated, the appended masterplan has demonstrated where the neighbourhood centre should be located and it is considered that the Council has the opportunity to specify the location in policy SA3/4, as it has sought to do for the employment land.

KDC 8

4.22 It is considered that KDC 8 could be made clearer. At present, it states that the Extension must result in no net loss of the overall site area or facilities of the existing recreation ground. A net loss in area of the site is certain should the link road be built through the southern portion of the site. It is considered that the KDC should make reference to the replacement provision resulting in no net loss of existing POS.

KDC 10

4.23 The HSE has confirmed that the pipelines do not impact on the Forton Extension. As such, this KDC is not necessary.

[9] Appendix 4: Land north of Forton

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KDC 11

4.24 KDC 11 lists matters to be taken into account "*in preparing the masterplan and planning application*". This suggests that only one application will be submitted. The KDC should allow for multiple applications.

4.25 It is also considered unnecessary to refer to the Minerals Safeguarding Area and Source Protection Zone 3 given the site will be allocated for development.

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5 MM090 Local Plan Review

0358/m/05/c

5.1 Policy LPR1 requires a Local Plan Review to be undertaken before the end of 2019 and as soon as possible after the adoption of the Local Plan. This follows the Inspector's advice, which presented the Council with two options:

1. Suspend the examination to robustly review the highway and transport evidence; or,
2. Build a review mechanism into the LP, committing the Council to submission of the review within 3 years of the adoption of the LP.

5.2 It is acknowledged that the Inspector presented these two options with a view to the Council being able to adopt a LP without the need for significant delay. However, it is considered that the need for an immediate review demonstrates that the LP is not sound.

5.3 The Council was aware of the highways capacity issues throughout the eLP process. Representatives from the Council attended the Fylde Local Plan Examination in March 2017 to challenge the Duty to Cooperate and request assistance for its unmet housing need. Various consultation responses throughout the Wyre eLP process highlighted issues with the LCC Highways evidence. Wyre Council evidently had ample time to ensure a strong highways evidence base to inform its eLP but failed to do so.

5.4 "*Whilst Inspectors are generally willing to find a plan sound where one or two finite issues remain unresolved and are relatively peripheral to the main thrust of the plan*" (Inspector's Interim Findings on Wale of Aylesbury Local Plan 2013-2023 examination), HSL considers that the inability to meet the housing need is an issue central to the Plan. The highways evidence and housing need are not finite issues and cannot be considered as peripheral to the main thrust of the plan.

5.5 Furthermore, it is considered that Option 2 does not represent positive planning. The Council is not able to meet its housing need over the plan period and has sought assistance from the neighbouring authority of Fylde. Option 2 will require the submission of the LPR by early 2022. It can be reasonably assumed that the examination process will result in the LPR being adopted towards the end of 2022. If, as LCC Highways expects, the Review finds that the housing cannot be accommodated on the highway network, Fylde will then commence work on a Review of its Local Plan in order to find suitable housing sites. This process could reasonably take another 2 – 3 years, with adoption of the Fylde LP not taking place until 2025/26.

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5.6 Option 1 would undoubtedly result in the unmet need being delivered much quicker and would represent a positive planning solution.

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6 Conclusions

6.1 This CS has demonstrated that it is necessary for the Council to make significant modifications to the Local Plan for it to be found sound, including:

- the windfall allowance must be reduced/removed due to highways capacity constraints;
- the Masterplan requirement for SA1 and SA3 sites must be removed or significantly reduced to ensure a deliverable and developable housing land supply;
- policy SA3/4 and its associated Key Development Considerations must be amended in order to achieve positive planning.

6.2 Hollins Strategic Land would welcome the opportunity to discuss this CS with the Council's Planning Policy department and would like to participate in future Hearing Sessions should the Inspector consider them necessary.

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Appendix 1

Guidance on the Preparation of Masterplans

Guidance on the Preparation of Masterplans

V1.1
September 2018

1.0 Introduction

1.1 This Guidance on the Preparation of Masterplans sets out Wyre council's requirements for the preparation and approval of masterplans as required by the Wyre Local Plan.

1.2 The Local Plan at paragraph 9.1.5 requires the preparation of 'masterplans' for certain residential and mixed use allocations before planning permission will be granted. The nature of these sites varies from purely residential (50+ dwellings) to more complex mix use sites of several hundred dwellings. In some cases these allocations represent a significant extension to an existing settlement.

1.3 Allocated sites will contribute significantly towards meeting the borough's identified development needs in the period up to 2031. Although meeting housing and other needs is a requirement of national planning policy, it is important that the development that comes forward on these sites takes place in a manner that respects and integrates well with the existing settlement. It is also important that new developments create high quality environments – including the provision of green infrastructure - for future occupiers and existing residents. In addition, a number of allocations require the careful planning of supporting infrastructure such as education and health provision. Also whilst some sites are in single ownership, others involve several landowners. The requirement for a masterplan is therefore essential to ensure that each site is brought forward in a comprehensive and cohesive manner that contributes to the creation of sustainable places. The preparation of a masterplan will require the collaboration of all landowners and stakeholders and consultation with local communities.

1.4 Where an approved masterplan is required for a specific site this is identified in the allocation policy for that site as a Key Development Consideration.

2.0 What is the purpose of this guidance?

2.1 This Guidance is set out in the form of answers to a series of questions. It has been considered and endorsed by the Planning Policy Working Group[1] and approved by Wyre council Cabinet.

2.2 The Guidance has been prepared to assist landowners/developers and stakeholders in preparing masterplans where this is required by the Wyre

[1] The Planning Policy Working Group is a cross party advisory group set up to assist in the preparation of the Local Plan.

Local Plan. The Guidance also serves to ensure that there is transparency for local communities with regard to the process of masterplan preparation.

3.0 What is a masterplan?

3.1 "*Master plans are about setting out a vision for an area undergoing change and a strategy for implementing that vision. They are about taking the initiative in terms of design, layout, houses, jobs and services… Critically, they must show local people what an area might look like in the future.*" (Our towns and cities: the future - Delivering an Urban Renaissance, DETR, 2000)

3.2 Masterplanning is about place making. A good masterplan should tell a 'story' about the place as it is now and how it will be in the future through the development of the site in question.

3.3 A masterplan is a document that – through plans, drawings and text - will determine key aspects of the future development such as the:

- Distribution and interrelationship of activities/uses.
- Relationship between spaces and buildings (existing and new).
- Degree of 'permeability' – visual and physical.
- Best location of different type of uses.
- Movement networks within and out with the site.
- Provision of infrastructure.

3.4 The foundation of a masterplan is a good understanding of the site and its surroundings.

3.5 Developing a masterplan will be a collaborative process between landowners and stakeholders involving setting a shared vision, agreeing objectives and priorities, generating options and resolving issues. The process will include effective community engagement and consultation.

3.6 Preparing a masterplan often involves applying urban design principles to the site in question with the aim of producing drawings, images and text which combine to provide illustrations of the layout, form and character of the development.

3.7 Relevant urban design principles include –

a. Achieving connections and links – a place that is safe but easy to get to and move through
b. Creating clear development blocks

c. Creating a public realm where public and private spaces are clearly distinguished
d. Ensuring legibility – a place that is easy to understand with gateways and landmarks
e. Ensuring mix of uses where relevant
f. Protecting and, where appropriate, enhancing, the environment and biodiversity
g. Creating a rich and delightful visual experience
h. Achieving flexibility and adaptability - a place that can respond to changing needs.

4.0 How is a masterplan going to be used in the planning process?

4.1 Planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The policy requirement for an approved masterplan where required through a site allocations policy will therefore have a significant weight in determining a planning application.

4.2 The Local Plan requires development proposals on sites which require a masterplan to be in line with the relevant approved document. The approved masterplan itself will therefore be a material consideration of significant weight in the determination of planning applications.

5.0 What should a masterplan contain?

5.1 The extent and contents of a masterplan, and the process by which it is produced, will depend on the scale and complexity of development proposed. The council will therefore adopt a proportionate approach to its requirements for masterplanning. For instance where a site is in a single ownership and a single use is proposed, with no supporting on site infrastructure required, such as a school, health facility or community and shopping facilities, the masterplan could take the form of an enhanced design and access statement containing more detail than is usually the case and written with reference to the Masterplan policy requirement and this guidance.

5.2 Where a site of more significant scale – over 100 dwellings – or a mix of uses is being considered, a more detailed document will be required.

5.3 However, all masterplans should include written text and 'visual' material including, as appropriate, plans, drawings and photographs. All masterplans should demonstrate a clear vision and rationale for the design of the

development supported by the appropriate evidence. All masterplans should establish spatial principles relating to land use, transport, design and green infrastructure and provide the framework for the development for the whole site. All masterplans should identify as appropriate how the Key Development Considerations for the site in question are, or can be, addressed.

5.4 The masterplan should be supported by a series of technical studies which provide a robust evidence base for the masterplan. The extent and depth of these studies will depend on the nature of the site in question, with more complex and larger scale sites requiring a more in-depth supporting evidence base. The relevant 'Key Development Consideration' and the Core Development Policies of the Local Plan should be a starting point in determining what technical studies are needed.

5.5 The written text should cover where appropriate and relevant:

- Site description and context including a plan showing the physical area of the masterplan and the wider context.
- Planning policy context.
- Summary of the main findings / issues from the technical assessments, including a reconnaissance plan.
- Strategic vision for the site and series of development objectives.
- The masterplan framework which will guide the quantum and layout of development across the site and address matters such as residential density.
- Development principles which will guide development relating to for example transport, green infrastructure, design including built form and public realm.
- Framework for delivery including infrastructure requirements.
- A phasing plan.

6.0 Does the masterplan need to cover an area with an extant planning permission?

6.1 The masterplan will need to cover the whole allocation inclusive of land with planning permission. An extant planning permission can be implemented, however where the planning permission lapses a subsequent application will need to be prepared in accordance with an approved masterplan.

6.2 A landowner with an unimplemented planning permission will be invited to participate in the masterplanning exercise. The final masterplan may or may not reflect the planning permission. That landowner will effectively have two options until the planning permission lapses.

6.3 In circumstances where an existing permission has been granted but a new application is submitted for a scheme that materially differs from that approved, the requirement for a masterplan will apply taking into account the advice contained in this guidance and key development considerations in the relevant Local Plan allocation policy. The new application will need to comply with an existing masterplan where one has been prepared or an appropriate masterplan covering the whole allocation will be required before the new application can be determined.

7.0 What are the implication of a landowner not participating in the masterplanning process?

7.1 A landowner may not be willing to participate in the exercise because the development of the site is not an immediate priority. In such circumstances the masterplan must consider the entire allocation and set down the framework for more detail work at a later stage for the parcels of land involved. The masterplan must ensure that the required mix of uses is planned for rather than deferring provision to the later stage.

8.0 What is the process for producing a masterplan?

8.1 Masterplanning is the process by which key elements of the development and its context are identified. When a planning application is submitted most key decisions would have been made as part of the masterplanning exercise.

8.2 Producing a masterplan is the responsibility of the landowner(s) / developer(s) with input from relevant stakeholders. The role of the council is primarily to facilitate and steer the process, host necessary meetings, ensure a robust and effective document and that due process is followed to give the masterplan credence.

8.3 The outcome is a document which forms a material consideration of significant weight in the determination of planning application(s). Engagement with stakeholders and consultation with the local community is an essential part of the process.

Working arrangements

8.4 For more complex masterplans, it is envisaged that the process will be managed by two groups – a) Landowners Group and b) Stakeholder Group. In relation to relatively simple developments of less than 100 dwellings and where there is no on site infrastructure requirement a masterplan which meets the requirements of this guidance as to its content can be prepared without the need of specific landowner and stakeholder group meetings. In these

cases the masterplan must be supported by evidence of separate engagement with stakeholders.

a) Landowner Group

8.5 The Landowners Group will consist of the landowner(s) of the site in question and/or their appointed agent(s). This will include developers who have options on the land in question. The council will call the inaugural meeting and further meetings to ensure progress on the preparation of the masterplan. The purpose of the group is to agree:

- Working relationship between landowners and assignment of responsibilities
- Budget/resources
- Timetable
- The commissioning of survey work and technical studies

8.6 In most cases where the land is in more than one ownership, the landowners/ agents/ developers will need to separately appoint a surveyor/property consultant who will advise on an 'equalisation' agreement (i.e. the distribution of costs and values).

b) Stakeholder Group

8.7 The Stakeholder Group will consist of landowners, council officers and relevant ward Members, the Parish or Town Council where relevant and any relevant stakeholder organisations such as Highways England, Environment Agency, United Utilities, Lancashire County Council Highways Authority and Education Authority.

8.8 The purpose of the Stakeholder Group is to discuss and progress –

- A vision for the masterplan
- Scope of the evidence base
- Main issues to be addressed
- Master planning options
- Design principles
- Consultation exercise
- The draft masterplan for submission to the council for approval.

Key elements of the process

Understanding the place

8.9 Before starting planning the change for an area, it is necessary to look at how it works now, how it came to be that way, and how this understanding can be applied to shaping its future.

8.10 Understanding a place means much more than looking at a pattern of land uses at a point in time: you need to develop a rounded and inclusive view of how a place works.

Visioning

8.11 The vision is an expression of what a place could be like in the future. It a fundamental part of the masterplanning process.

8.12 It describes the kind of place we want covering the physical, economic and social elements.

8.13 A vision is about the future and it must be flexible enough to cope with change over time as the project progresses.

Reconnaissance / site surveys / technical work

8.14 **Site surveys** are detailed studies carried out to give an understanding and verify site information. Detailed surveys will focus on specific issues. A walkover survey will be essential and should include a photographic survey. This work will constitute a site appraisal(s).

8.15 The Landowner Group will need to identify and appoint necessary specialist consultants to undertake survey/technical work (to be agreed with the council), which might include:

- Topographical survey, including ground conditions
- Environmental protection matters such as ground contamination, air quality and noise
- Landscape and visual assessment incorporating a townscape and character appraisal
- Phase 1 habitat survey
- Tree and hedges survey
- Open space analysis, to cover the immediate area
- Flood risk assessment
- Transport assessment
- Heritage assessment including archaeological survey

- Utility services – electricity, gas, sewerage, drainage, water supply
- The requirement for community facilities in the immediate area, including educational provision.

8.16 Information should be prepared or obtained in a format which can be readily shared and used – map/plan form in most cases - wherever possible. There should be a series of maps or plans that feed into a site appraisal map.

8.17 Surveys, technical reports and documents relating to consultation will be published as part of the masterplan.

Public engagement and consultation

8.18 The input of the local community through engagement and public consultation in masterplanning is essential. Where there is a parish or town council it is expected that on-going engagement will be through membership of the Stakeholder Group. Wider public involvement is likely to be through consultation on masterplan options. The consultation undertaken should be appropriate to the nature of the masterplan (see para. 5.1 above). However, all consultation undertaken as part of the masterplanning process should be effective and the approach to be employed should be discussed and agreed at the Stakeholder Group. It should:

- Take place for a minimum period of three weeks;
- Be appropriately publicised, using existing community networks and organisations as appropriate;
- Include drop in session(s) in the local area;
- Set out the conclusions from the various studies on a map form; and
- Set out options where reasonable options exist.

8.19 In relation to less complex masterplans relating to allocations of less than 100 dwellings engagement with the relevant Parish or Town Council and / or relevant ward Member should be undertaken before the draft masterplan is finalised and published for public consultation.

8.20 It is important that the consultation process is open and transparent. To this end, the council will make available for viewing and downloading copies of the consultation material (including consultation form) on its web site. Consultation responses should only be sent to the council (planning policy team). Consultation responses will be placed on the council's web site (with personal details removed). Following public consultation there should be a transparent audit trail of how representations have been considered. The council will make available the responses received (with personal details removed) to the Landowners Group or their representatives who should produce a summary of the main matters raised and prepare an appropriate

response. The summary and response should be reported to the council and stakeholder group. The council will consider the appropriateness of the response to the issues raised when considering the masterplan for approval.

Approval process

8.21 All masterplans required under Local Plan allocation policies will be subject to internal consultation with members sitting on the Planning Policy Working Group, (PPWG) with a recommendation to Cabinet or Portfolio Holder as appropriate. A meeting of the PPWG will be held to consider all masterplans for development of over 100 dwellings or where otherwise considered to be necessary. Council Officers will present the masterplan to the PPWG in such circumstances.

8.22 For the avoidance of doubt, this approach will apply to all masterplans, regardless of the type or level of detail involved, including those that may be considered to be enhanced design and access statements. Where a site lies within a ward that is not represented on the PPWG, the relevant ward member will be consulted.

8.23 Approval of Masterplans will be by Cabinet other than where a masterplan relates to a residential allocation of over 50 dwellings and up to 100 dwellings where the allocation policy includes no specific infrastructure requirements such as a new school, health facility or other community and shopping facilities. In such cases approval is delegated to the Planning and Economic Development Portfolio Holder.

8.24 Approved masterplans will be a material planning consideration when considering relevant development proposals.

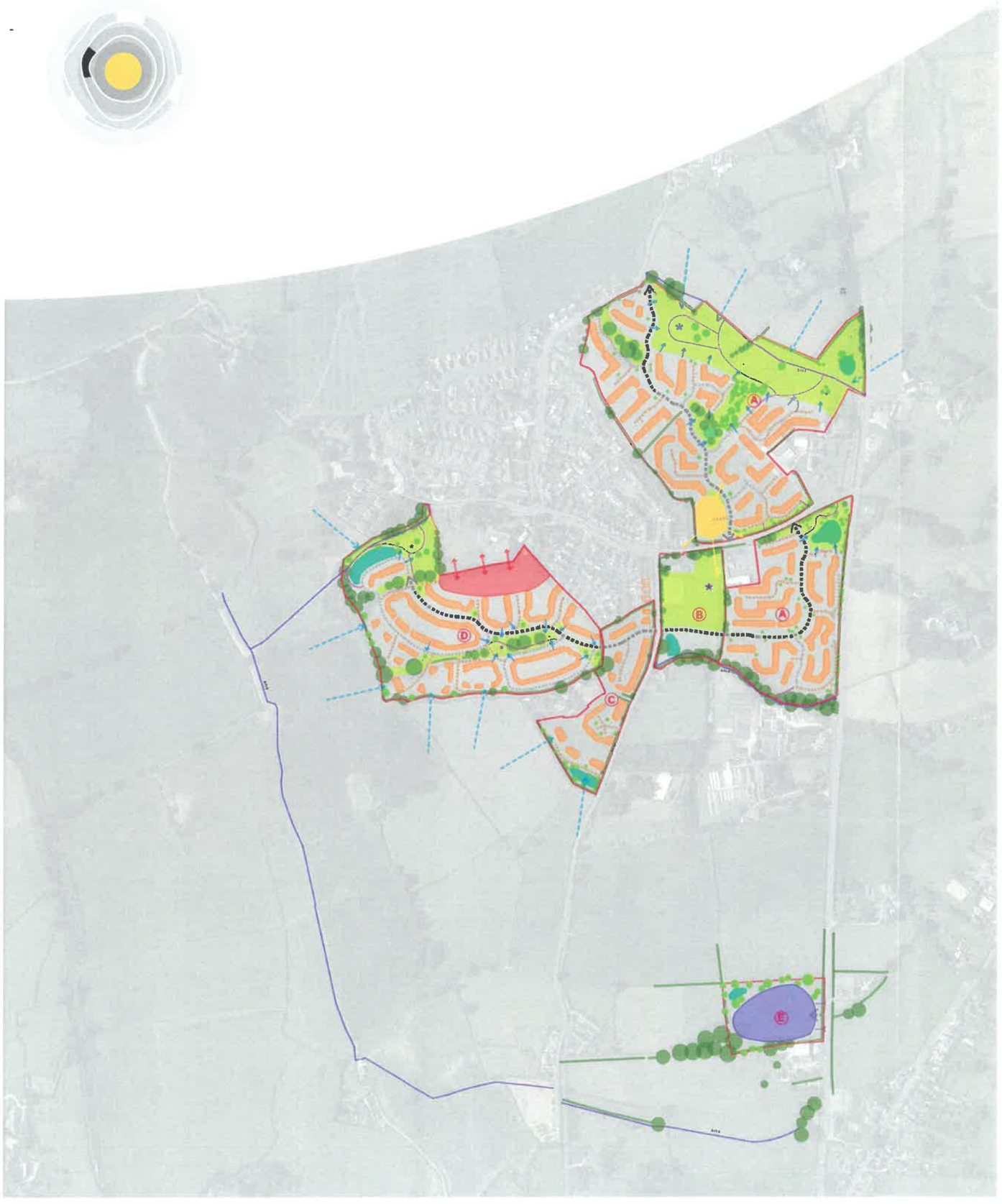
9.0 What happens if the council does not approve a masterplan?

9.1 If the council is of the view that a masterplan is in some way inappropriate or lacking in some respect, it will be referred back to the Landowner Group for further consideration. It may be necessary to bring the stakeholders together to resolve any outstanding matters prior to re-submission to the council for further consideration.

9.2 If a planning application is submitted without an approved masterplan, consideration will need to be given as to whether or not the application prejudices the comprehensive development of the allocation and delivery of a masterplan.

Appendix 2

Forton Masterplan



Masterplan

Forton Extension
Wyre

Date: October 2018
N0535(100)001

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Kathryn Sather & Associates
Heritage Conservation Consultants

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Produced by: Influence Environmental Ltd
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The emerging Wyre Local Plan (eLP) proposes to allocate land for the Forton Extension, comprising of at least 310 dwellings, 1ha of employment land, public open space and a neighbourhood centre to include a small convenience store, community hall and health facility.

Policy SA3/4 of the eLP states that the Forton Extension is to be brought forward in line with a Masterplan to be produced covering the whole of the site and that the Masterplan must be agreed by the Local Planning Authority prior to the granting of planning permission for any part of the site.

This Masterplan has been produced by Influence Environmental Limited in response to eLP policy SA3/4 and on behalf of Hollins Strategic Land, Christopher Hewitt, Edward, Ian and Catherine Potter and Rachel Thompson, the Diocese of Lancaster and Mr. John Carr (Parcels A, C, D and E respectively).

Influence Environmental Ltd is a landscape and design consultancy. Their masterplan design has been informed by a strong appreciation of the character of the land parcels and surrounding areas and an understanding of the constraints and opportunities offered.

The Masterplan is also informed by advice from the following consultants:

- Flood Risk and Drainage – Betts Associates;
- Heritage – Kathryn Sather Associates;
- Highways and connectivity – Croft Transport; and,
- Ecology – ERAP.

As a result, the Masterplan is based on a comprehensive evidence base and can be relied upon to provide a sustainable and deliverable extension to Forton.

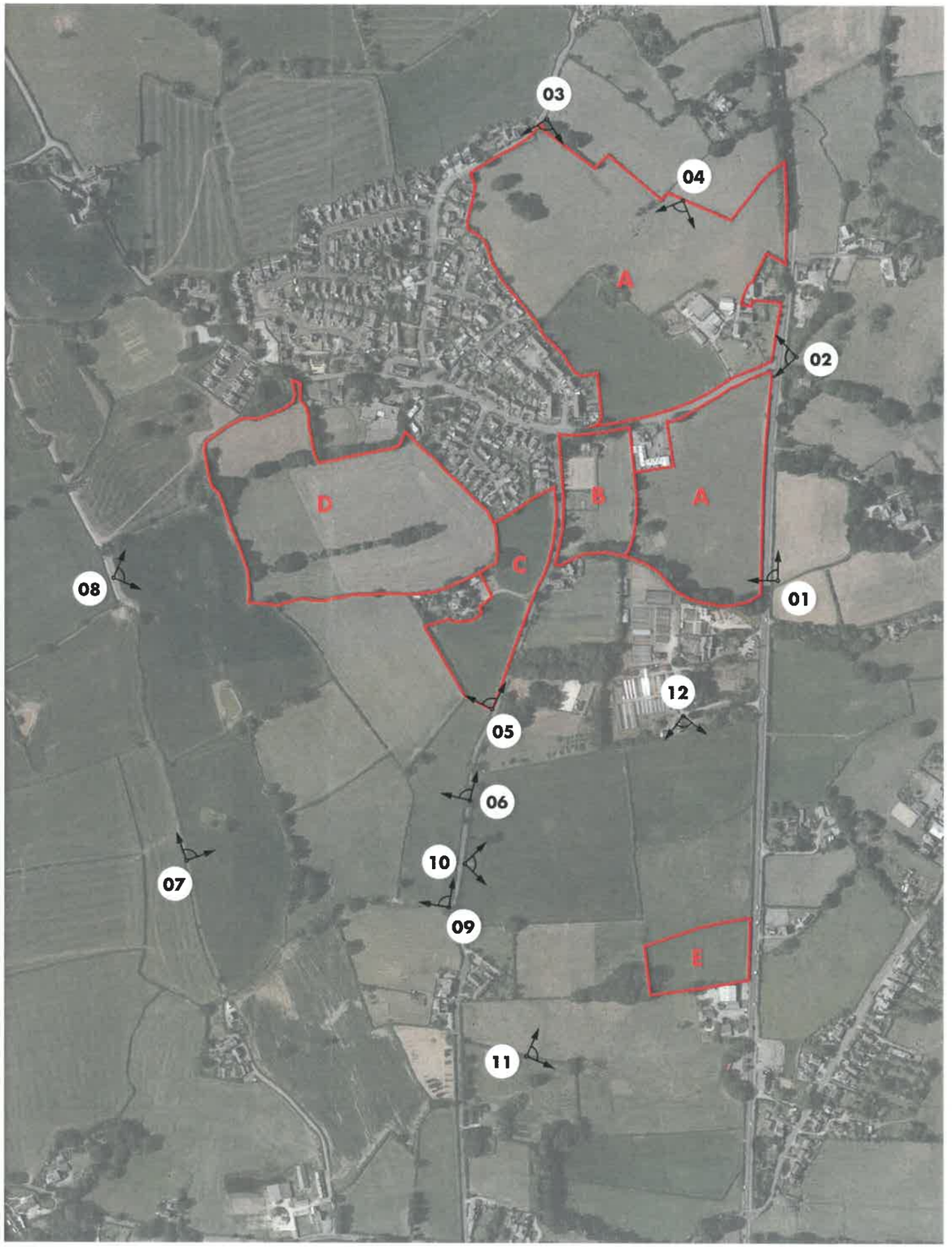
The Site
Forton is a village and civil parish in the Wyre District of Lancashire, close to the Forest of Boland. It is located approximately ten kilometres from Lancaster and 1.5km to the west of the M6. The A6 Preston Lancaster Road runs close to the east of the settlement.

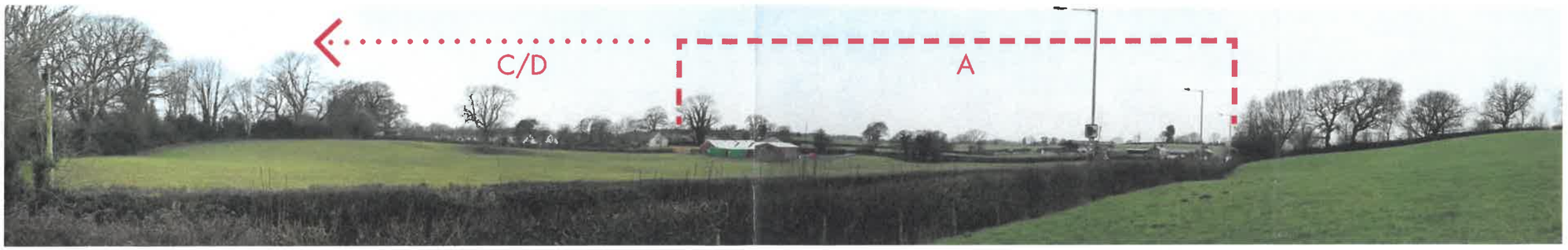
The settlement is located within the Coastal Plain Character Area 15e Forton-Garstang_Catterall, as noted in the Lancashire County Councils Landscape Character Assessment 'A Landscape Strategy for Lancashire'. This is described as a gently undulating landscape of rural farm land dominated by improved pasture and scattered with historic halls, farms and woodland. A network of land links the nearby villages, although the A6 provides a fast route along the edge of the character area.

To gain an appreciation of the characteristics of the sites and surrounding areas field studies have been carried out.
This has helped gain an understanding of how topography and existing vegetation patterns both limit visibility and help define a strong framework for the sites.

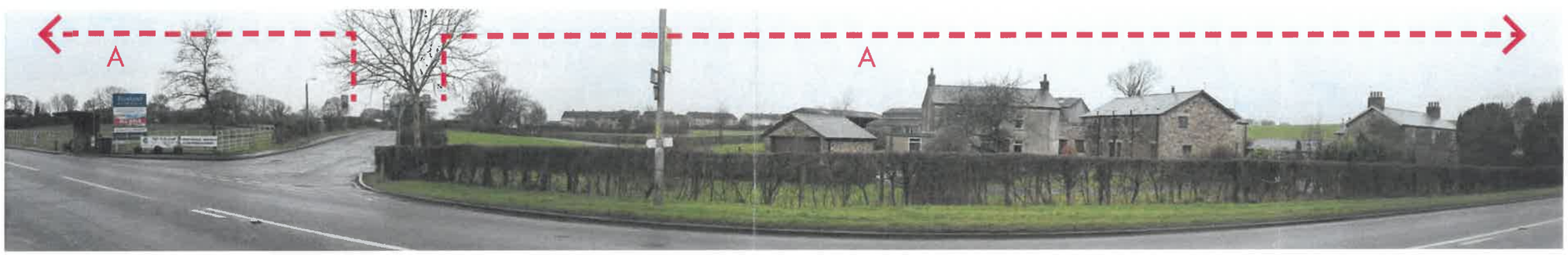
The vernacular of built form and the use of local materials and landscape components which gives the area a sense of place will be referenced to help inform design work going forwards.

The earliest part of the existing settlement is based around the junction of School and Wallace Lane, at the location of the village Hall and School and Congregational Chapel. Outer lying farm and cottage buildings are also evident on early mapping. The mid twentieth century saw an influx of new residential development in the village, with further parcels of land developed. Whilst earlier built form and landscape details incorporated local stone, later additions to the village utilise brick and render in their facades.



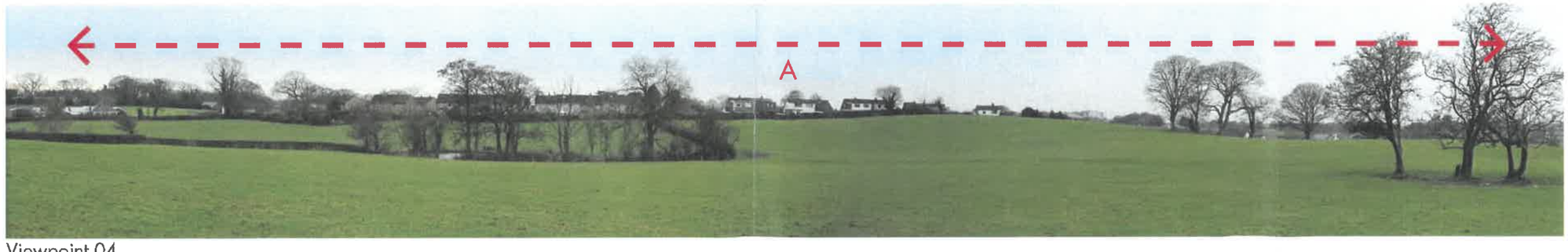


Viewpoint 01



Viewpoint 02

Viewpoint 03



Viewpoint 04

Viewpoint 05

Viewpoint 06

Viewpoint 07

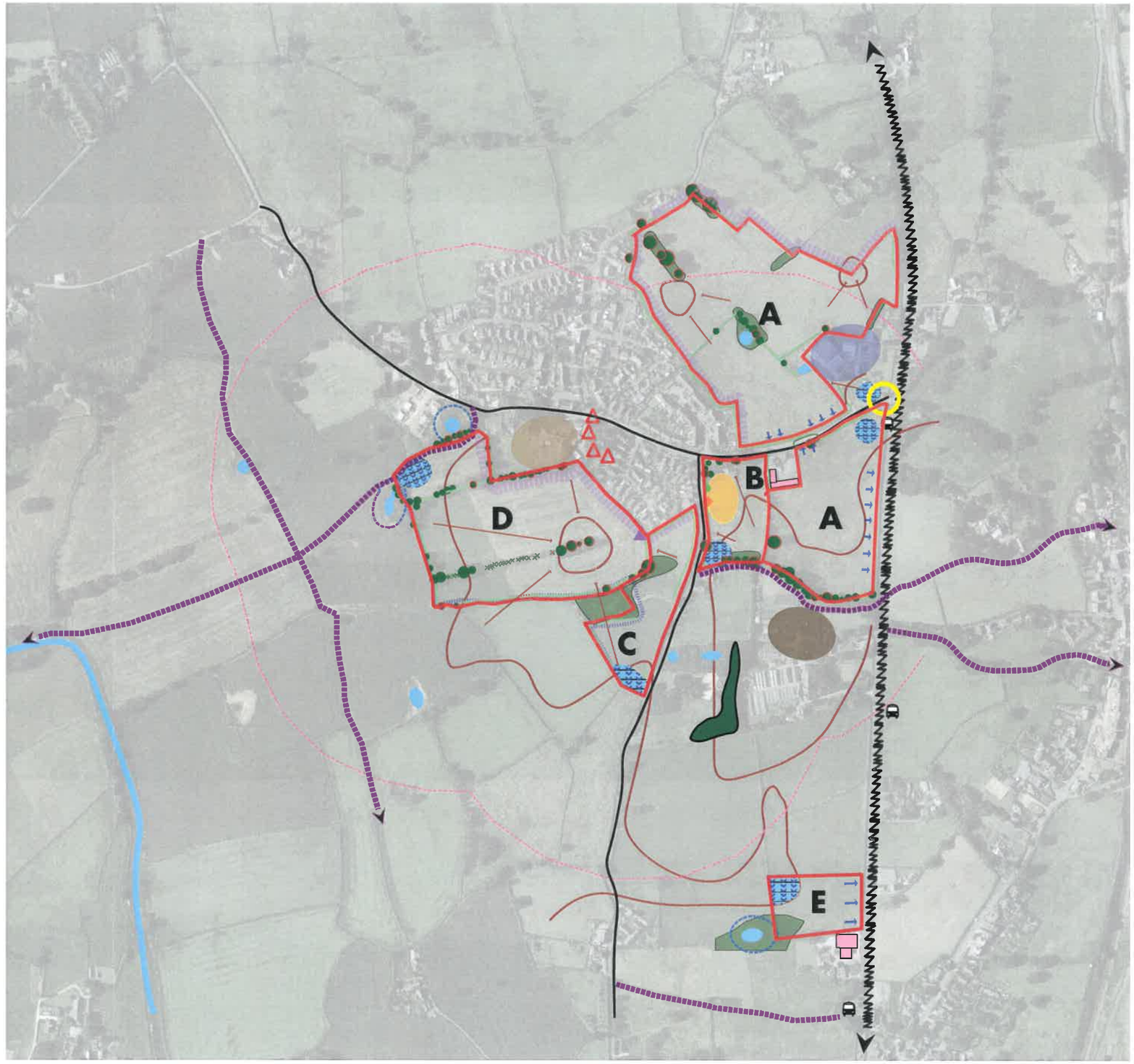
Viewpoint 08

Viewpoint 09

Viewpoint 10

Viewpoint 11

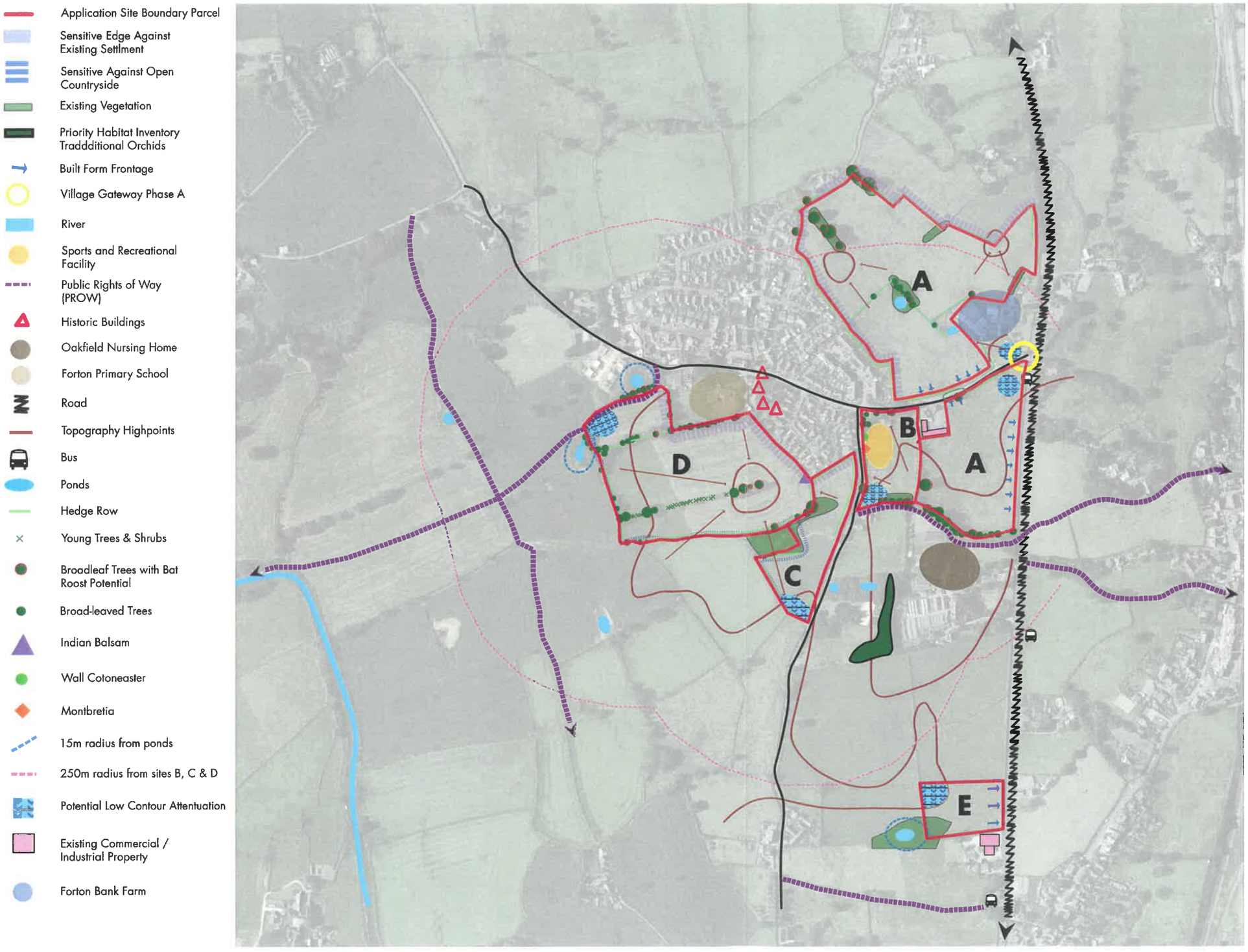
Viewpoint 12



- Application Site Boundary Parcel
- Sensitive Edge Against Existing Settlment
- Sensitive Against Open Countryside
- Existing Vegetation
- Priority Habitat Inventory Tradditional Orchids
- Built Form Frontage
- Village Gateway Phase A
- River
- Sports and Recreational Facility
- Public Rights of Way (PROW)
- Historic Buildings
- Oakfield Nursing Home
- Forton Primary School
- Road
- Topography Highpoints
- Bus
- Ponds
- Hedge Row
- Young Trees & Shrubs
- Broadleaf Trees with Bat Roost Potential
- Broad-leaved Trees
- Indian Balsam
- Wall Cotoneaster
- Montbretia
- 15m radius from ponds
- 250m radius from sites B, C & D
- Potential Low Contour Attentuation
- Existing Commercial / Industrial Property
- Forton Bank Farm

Site Constraints

- Development should consider existing mature landscape;
- Visually sensitive residential receptors in close proximity;
- Development massing should respond to higher contours within the site;
- Adjacent Public Rights of Ways have views of the site;
- Proposed layout will need to respond to Farm House adjacent to site C;
- Protection and Maintenance of mature landscape should be considered;
- The potential ecological sensitivity of existing water bodies;
- Provision of access required through parcel B to serve higher residential capacities for parcel D.



Site Opportunities

- Limited visibility for residential receptors;
- Existing landscape vegetation and topology limits views from PROWs;
- Mature Landscape provides character by creating a strong landscape framework;
- Areas of the site have clear views of the Bleasdale Moors in the East;
- Opportunity to incorporate SUDs attenuation to lowest gradient of site;
- The sites provide a central point for the primary school and other amenities;
- Opportunity to use the typology of the existing builds in Forton to expand the village;
- No flood risk has been identified;
- Connection to PROWs;
- Good connectivity to motorway;
- Access to public transport;
- Opportunity to plan cohesively;
- Ponds & watercourses provide potential amenity & biodiversity enhancement;
- Established commercial / industrial development adjacent to parcel E.

Masterplan
The masterplan is informed by the parcels and the nature of the surrounding settlement and countryside. It responds to the local topography and is informed by the well defined mature hedgerow and trees that sit within the sites.

The development will be seen as an 'organic' extension of the existing settlement and importantly create a transition between the settlement edge and surrounding open countryside. An understanding of the relationship and key views between the two areas is fundamental in developing the plan.

A landscape and green infrastructure framework will incorporate structured tree planting and on-site open space to allow for formal and informal play and pedestrian and cycle connectivity linking with the wider area. The positioning of these spaces will respond to new countryside edges and also the location of existing mature trees. These areas provide opportunity for sustainable drainage and the use of native trees, shrubs and wildflowers will help assimilate the development into the landscape and enhance biodiversity. Where possible, existing mature trees and hedgerow will be retained and protected.

Within the new residential development, various densities and consideration of surface materials will help create defined character areas. Hierarchy of roads will help define clear and natural movement through the site.

The proposed development will consist a total of 363 dwellings across Parcels A, C & D. Parcel A with 210 dwellings and a Neighbourhood Centre; Parcel B with a Community Hall and a potential road link; Parcel C with 33 dwellings and a potential road link connecting Parcels C and B; Parcel D with 120 dwellings and a School Extension; Parcel E with 1 Hectare of employment. The proposed development also consists of approximately 50,000m2 out of the 196,000m2 as Public Open Space (POS), which is well in excess of the green infrastructure requirement. This equates to approximately 25% of all the proposed Parcels.

Neighbourhood Centre
The Neighbourhood Centre is located so that it is accessible to existing Forton residents and future occupiers of the Forton Extension. It will form the heart of the village, opposite the existing bowling club, public open space and play provision. This, together with the strategically cited public open space across the Extension, will also aid social cohesion between existing and new residents.

Employment
The eLP Inspector's Post Hearing Advice suggested that the Council should allocate 1ha of employment land at the southern end of Parcel E, adjacent to Ashmead, or to the east of Jesmond Dene on Parcel A. The Council considers that the employment should

be located to the east of Jesmond Dene because being "close to the facilities in the new neighbourhood centre will benefit future workers" and it would "also better relate to the main area of housing growth and encourage walking and cycling".
This Masterplan proposes that the employment is located north of Ashmead, within Parcel E and there are a number of reasons for this:

- Parcel E adjoins existing employment and a café, representing a logical extension.
- There is limited employment at Jesmond Dene, which also encompasses a residential bungalow.
- The employment at Parcel E could come forward independently of the residential development within Parcel A.
- The flood risk and drainage advice for Parcel A demonstrates that an attenuation pond is required in the north eastern corner of the land south of School Lane. The Design Code for Parcel A also shows that the pond, associated public open space and cottage style residential development would provide an attractive gateway to the village.
- Whilst employment units could be designed in a sensitive manner, they would not be capable of providing as attractive a gateway as cottage-style residential development.

- The delivery of housing should be given significant weight. If employment were located in Parcel A, it would mean that residential development would need to be accessed through an employment site. This would undoubtedly reduce the attractiveness of the Forton Extension to housebuilders and therefore has the potential to impact on delivery rates and the housing trajectory.
- Parcel E would provide greater flexibility in terms of what form of employment could be provided in Forton given the lack of risk for conflict between residential and employment uses. The potential for conflict at Parcel A may limit occupancy to B1 uses, for example. Noise, disturbance and heavy goods vehicles movements would not be appropriate within a residential area.
- Parcel E would still be within 700m approximately of the Neighbourhood Centre and there would be easy and safe pedestrian routes along the A6, via PRoW 2-11 4 and via Winders Lane.

Parcel B
Parcel B is land under the control of the village Hall Committee and could not contibute towards the cost of production of the masterplan. In any event, Parcel B is only required for the Link Road between Parcels A, C & D; no other built development would take place on Parcel B.

School Extension
Accommodated in the heart of the development, Lancashire County Council Education Department states that 0.8ha of land will be required for a school extension. This is located within Parcel D, adjoining the existing school grounds. There is potential for the extension to be accessed via Parcel D or via the existing School Lane access. This can of course be considered in more detail when the planning application for Parcel D is submitted.

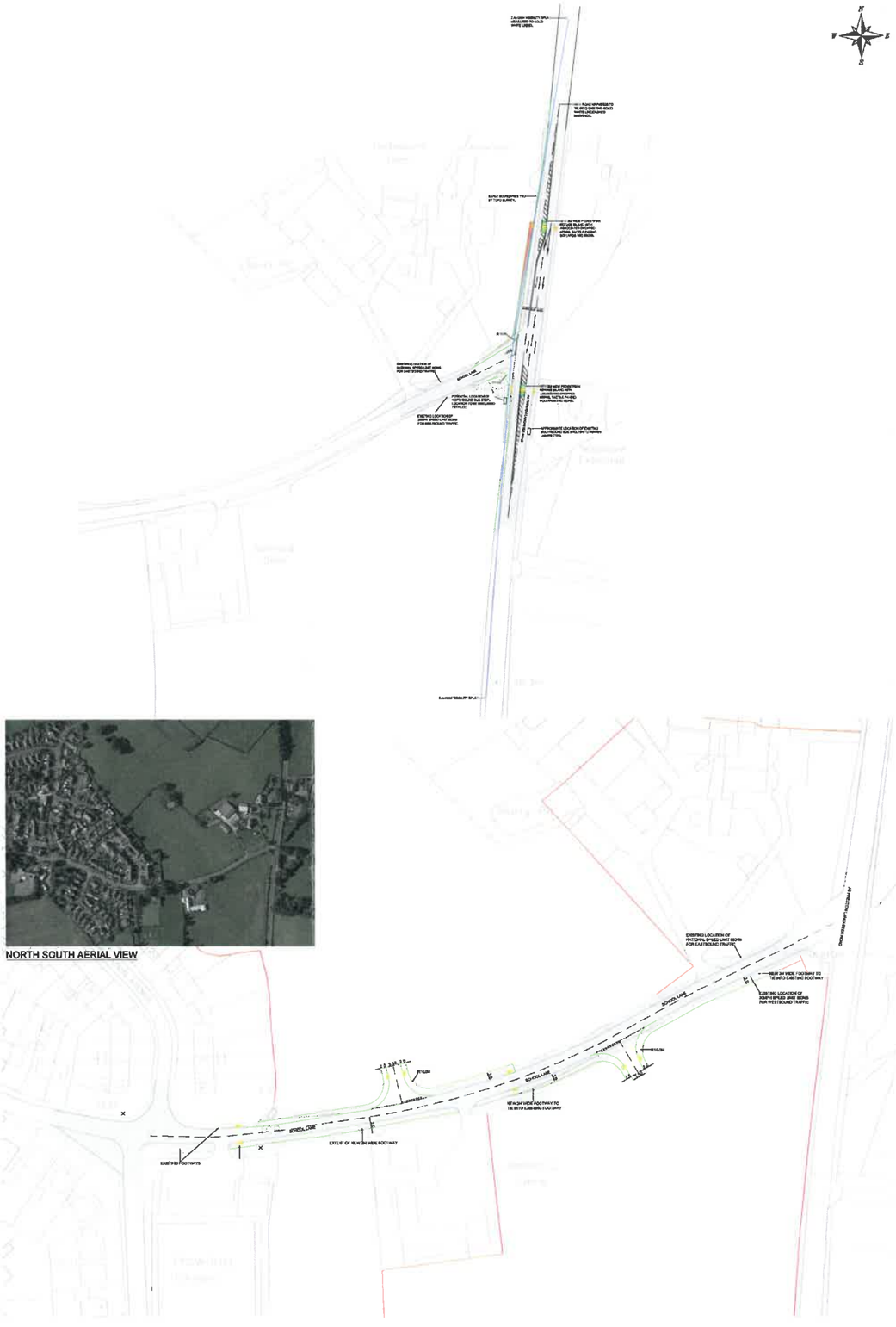
Hydrology
A Sustainable Drainage Assessment to support the masterplan has been undertaken by Betts Hydro Consulting Engineers. This has identified *the surface water and foul water drainage options in accordance with planning policy and the sustainable drainage hierarchy for all four of the allocation sites in the emerging Local Plan. Surface water management has been proposed for all parcels to minimise loading on any of the proposed outfall locations, by mimicking the existing situations on each site where practical the risk of increasing flood risks downstream can be minimised.* Further technical details will be provided during any subsequent planning applications. Suggestions for SUDs/ attenuation ponds have been incorporated into the Masterplan.

Heritage
Kathryn Sather Associates have produced a heritage statement to support the development. This notes that *there are four listed structures within the vicinity of the development site allocated in the masterplan. These are: the United Reformed Church; the Tomb of James Aray, Southeast of the United Reformed Church; the Building to the Northwest of the United Reformed Church and the Mounting Block in the Courtyard Wall of the United Reformed Church. The four heritage assets are primarily experienced from School Lane to the north and from within the immediate churchyard area.*
The impact of proposed development as set out in the masterplan upon the setting of the Grade II listed structures has been assessed using Historic England guidance and using a heritage impact assessment methodology based upon the International Council on Monuments and Sites (ICOMOS) Guidance. Under this guidance the listed structures have Medium level of significance. The magnitude of change on the setting of the heritage assets is assessed as Negligible. Overall the impact on the setting and significance of the heritage assets has been assessed as Neutral.

Summary
The key principles that have guided this plan are:

- Character - a place with its own identity, but one which responds to the character of the surrounding environment;
- Continuity and Enclosure - a place where public and private spaces are clearly distinguished;
- Quality of public realm - a place with attractive an successful outdoor areas, one which provides amenity, recreation, biodiversity and sustainability benefits;
- Ease of movement - a place that is easy to get to and move through;
- Legibility - a place that has a clear image and is easy to understand;
- Diversity - a place with variety and choice.

The development of a masterplan that encompasses adjoining land parcels gives the opportunity to create a cohesive vision for the existing settlement and the surrounding area.



NORTH SOUTH AERIAL VIEW

Transport

An Access and Connectivity statement has been produced by Croft Transport Planning & Design with regards to access, capacity of the local road network and connectivity to the village and other land parcels. This report concludes that:

- *The proposed points of access will comply with current design standards and provide suitable infrastructure for pedestrians and cyclists;*
- *Demonstrates that such access junctions would not give rise to any highway or safety issues;*
- *Confirms that through careful and complementary design, the infrastructure associated with the Forton Masterplan will provide a well-integrated and sustainable development and provide a high standard of pedestrian and cyclist connectivity throughout;*
- *Potential improvements to the A6/school Lane junction will be subject to detailed discussions with the highway's officers at LCC;*
- *The site is located close to good pedestrian links and public transport networks and is therefore ideally situated to encourage trips by sustainable modes of travel, which will be encouraged through the implementation of Travel Plans for each development;*
- *The proposals will provide a sustainable development and in any event the impact would not be severe, as is the test in paragraph 109 of the National Planning Policy Framework.*

Ecology

ERAP Ltd Consultant Ecologists have produced an Ecological Synopsis and Guidance for the Site. This includes:

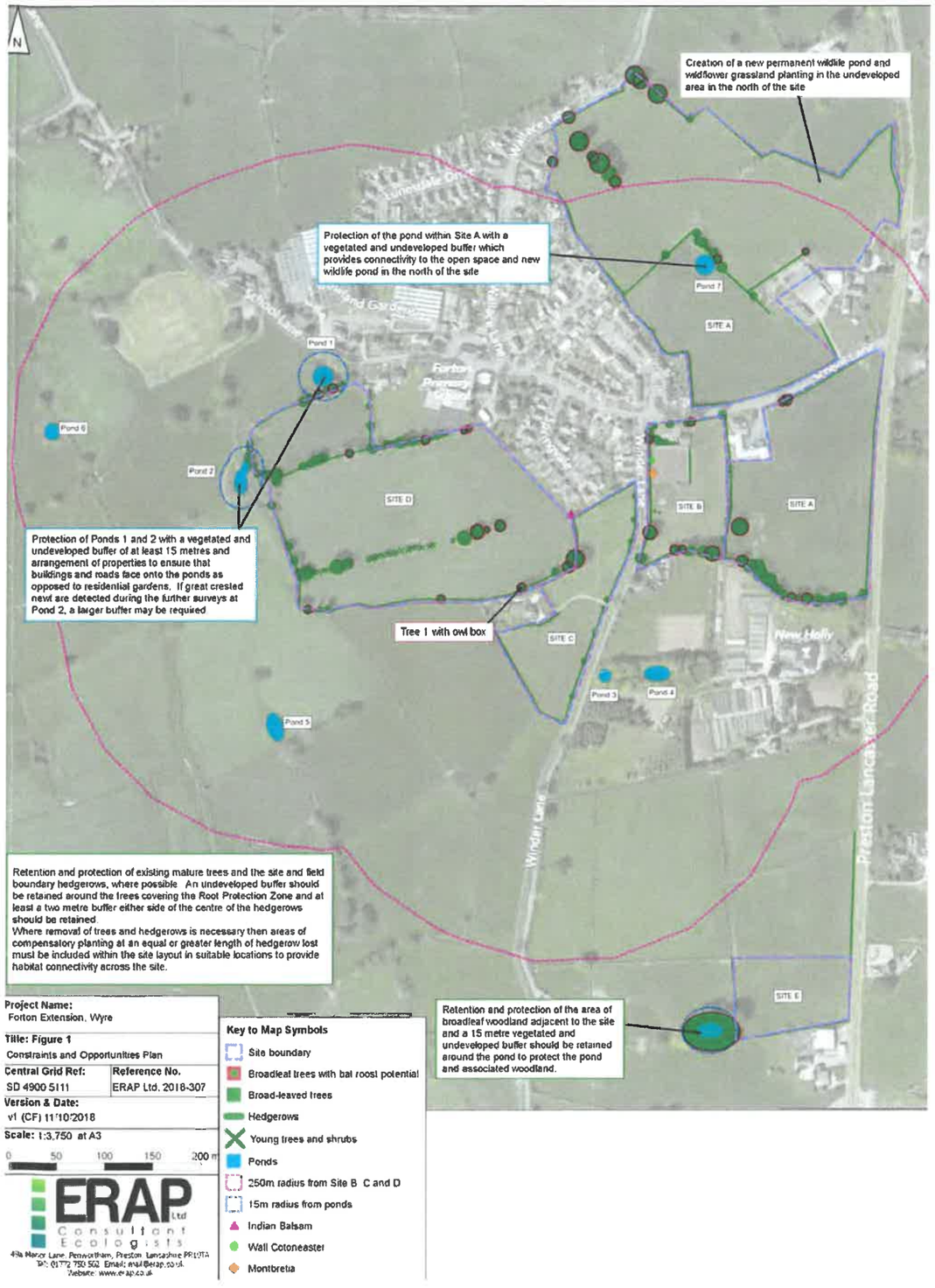
- A data search and desktop study;
- A walkover survey of Sites B, C and D and reference to the surveys completed at Sites A and E;
- Scope of survey required to facilitate a planning application at the site; and
- An ecological constraints and opportunities plan.

The Report also notes:

- None of Sites A to E have statutory or non-statutory designation for nature conservation;
- The proposals do not match any of the criteria for which the Local Planning Authority would be required to consult with Natural England on likely impacts.

A Constraints and Opportunities Plan to inform the site masterplan for Sites A to E has been presented and incorporated in the Section 3 Figures of this document. Ecological recommendations will ensure a sympathetic scheme with minimal impacts on the existing habitats within the site and surrounding the site, provide opportunities to enhance the ecological interest at the site and seek a biodiversity gain.

Recommendations arising from the report will be incorporated in the masterplan and the development design as it progresses.



5 Hard Landscape Palette

A hard landscape palette of natural materials that weather well will help to connect the new development with the existing settlement and provide legibility to the spaces.

- Hierarchy of materials defines access routes through site;
- Gravel driveways/ tegula paving and cobble thresholds define various character areas with the site and help imply degrees of privacy;
- Local vernacular dressed stone is utilised to assimilate the development into the surrounding area;
- Post and rail fencing is indicative of the area;
- Amenity areas utilise natural timber play equipment;
- Permeable materials to be utilised where possible.

- Well established, existing mature hedgerows and trees help define landscape framework;
- Existing mature trees incorporated within new public open spaces offer character and shade;
- Soft landscaping to road junctions create green nodes throughout the development;
- Attenuation ponds and swales offer potential landscape amenity and enhanced biodiversity;
- Proposed use of native hedgerow and trees and use of native wildflowers and marginal species enhance biodiversity on the site and help assimilate the development into the surrounding area;
- Incorporation of native hedgerow trees helps soften views of the development from open countryside.

Conclusion

Policy SA3/4 of the eLP states that the Forton Extension is to be brought forward in line with a Masterplan to be produced covering the whole of the site and that the Masterplan must be agreed by the Local Planning Authority prior to the granting of planning permission for any part of the site.

In summary this proposed Masterplan would:

- Follow the principles established in response to the sites context, constraints and opportunities;
- Provide a logical extension to existing development in a location with access to the existing highway network and sustainable modes of transport;
- Make efficient use of land close to the edge of existing development with dwelling types, sizes and tenures that are consistent with local housing needs;
- Protect and reinforce existing landscape features and enhance biodiversity without negative impact to the wider landscape character;
- Meet the overall objectives of creating inclusive and sustainable development by providing high quality housing appropriate to its location;
- Respect the unique qualities of this site, with the aim to create a safe and secure environment for residents and visitors.

In line with Emerging 'Policy SA3/4: Forton Extension' of the Wyre Local Plan, the development incorporates landscape and green infrastructure, working with existing features such as footpaths, hedgerows and trees.

The Masterplan sets out parameters for development that would provide a firm basis for planning applications to be brought forwards on the individual sites at a later stage, with the overall aim of producing cohesive development at Forton.

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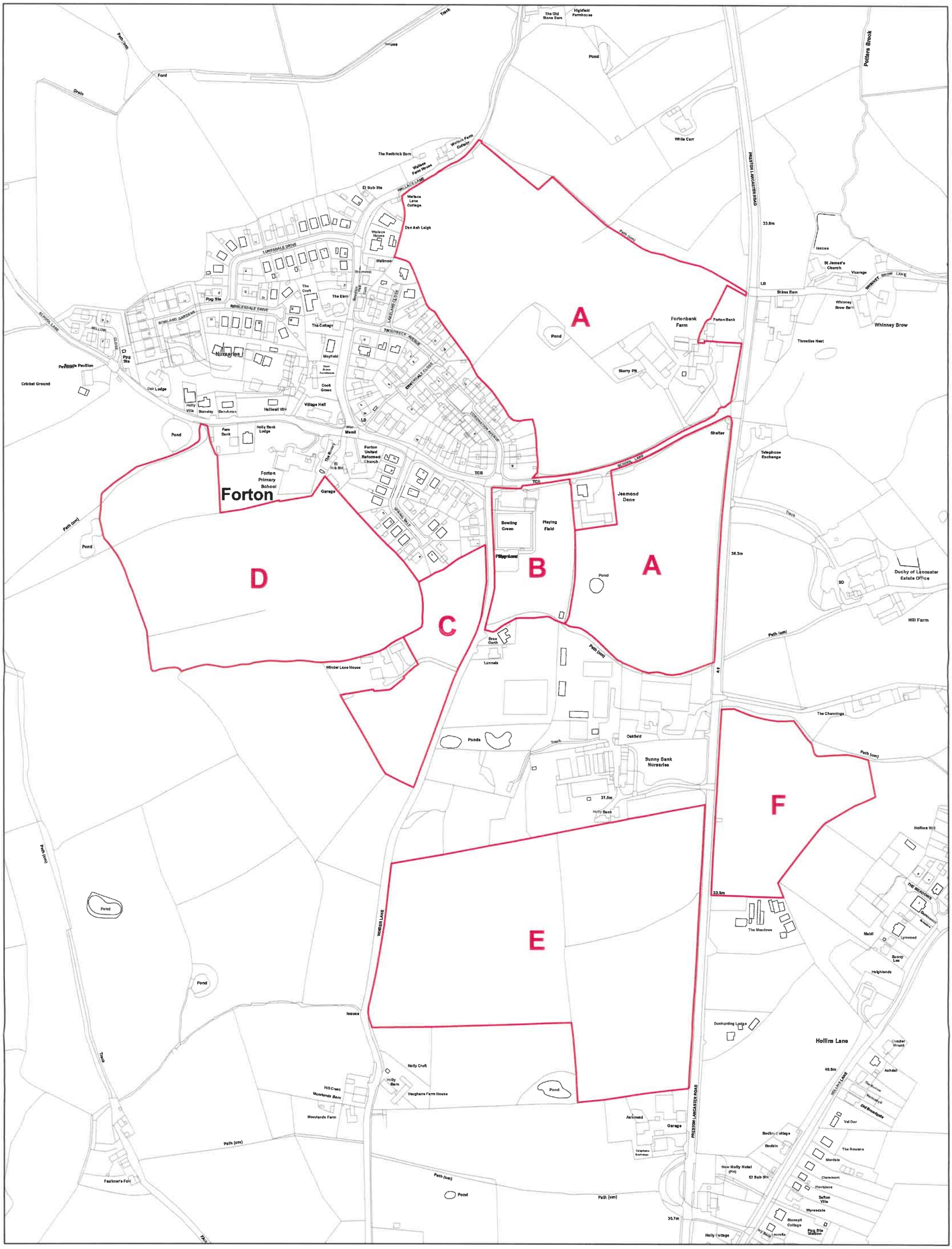
Figure 2

Appendix 3

Land Parcels



Site SA3/4 - Forton Extension, Forton (land ownership)

A = Christopher Hewitt
B = Village Hall and Recreation Ground Committee
C = Edward, Ian and Catherine Potter and Rachel Thompson
D = Diocese of Lancaster
E = John Carr
F = Margret Rowlands and Susan Redmayne

N

Date: 23/02/2018

Appendix 4

Land north of Forton

Forton

Nurseries

Wallace Farm Cottage

Brookfield Farm

White Carr

Potters Brook

Fortonbank Farm

Whinney Brow

Cricket Ground

Forton Primary School

Jesmond Dene

Playing Field

Winder Lane House

Hill Farm

The Bramblings

Hollins Hill

Sunny Bank Nurseries

The Meadows

Haighlands

Hollins Lane

Moorlands Farm

Vaughans Farm House

Ashmead

Faulkner's Fold

Glenroyd

Forton Lodge

Issues

Issues Track

Drain

Path

Track

Iss

PW

PH

War Meml

WALLACE LANE

SCHOOL LANE

WHINNEY BROW LANE

TROUTBECK

WINDER LANE

FAULKNERS LANE

34m

32m

36m

41m

39m

HSL HOLLINS STRATEGIC LAND

Forton 1:7500

Drawing Ref: 02

Taylor Wimpey UK Ltd C/o Lichfields

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received	24/10/18	Rep. No.	0363/M/01-11/B1,C

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?

Yes ☑ No ☐ 0363/M/01/B1

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

N/A

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation. 0363/M/01-11/C

Main Modification Reference	MM/

Paragraph or Policy Reference	Please see written representations.

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☑

For Office Use Only: Date Received		Rep. No.	

If YES please provide additional information below if you wish. If NO please answer question 3b.

Please see written representations.

Please fill out Part F if you need additional space

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☑

Not justified ☐

Not effective ☑

Not consistent with national planning policy ☐

For Office Use Only: Date Received		Rep. No.	

Please provide precise details of why you believe this Main Modification is not sound:

Please see written representations.

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

Please see written representations.

For Office Use Only: Date Received		Rep. No.	

PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below.

N/A

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes ☑ No ☐

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

For Office Use Only: Date Received		Rep. No.	

Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

Please see written representations.

Please fill out Part F if you need additional space

Submitting your representation

Representations can be submitted using the on-line form which can be accessed and completed on-line at www.wyre.gov.uk/localplan

The representation form can also be downloaded from www.wyre.gov.uk/localplan

The completed form can be submitted by:

e-mail at planning.policy@wyre.gov.uk or
Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

If you would like assistance in completing your representation or have any other questions about the emerging Wyre Local Plan, please contact the Planning Policy Team by e-mail planning.policy@wyre.gov.uk or by telephone on 01253 887235 or 01253 887231. Forms **must be received by 5pm on 24 October 2018. Late representations CANNOT be accepted.**

In submitting the form, you understand that the information given is to the best of your knowledge correct.

LICHFIELDS

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

Date: 24th October 2018
Our ref:
Your ref:

Dear Sir / Madam

Wyre Local Plan – Consultation on the Schedule of Proposed Main Modifications

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

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 a draft allocation in the emerging Local Plan [Ref SA1/16]. Its development would assist in the delivery of sustainable development within the borough, making a significant contribution towards meeting the need for market and affordable housing.

These representations are subsequent to TW's response to the Matters, Issues and Questions [MIQs] raised by the Inspector in relation to the Examination in Public [EiP], and previous consultations on the Wyre Council Local Plan [WCLP]. It is a statutory requirement that every Development Plan document is submitted for an independent examination to assess whether it is "sound". Section 19 of the 2004 Act states, that in preparing a Development Plan document, a local planning authority must have regard to a number of matters including national policies and advice contained in guidance issued by the Secretary of State. Such guidance currently exists in the form of the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [Practice Guidance]. Although a revised Framework was published in July 2018. It outlines that plans submitted before the 24th January 2019 will be examined against the provisions of the Framework (2012)[1].

There is no statutory definition of "soundness". However, the Framework[2] (2012) states that to be sound a Local Plan should be:

1 **Positively Prepared:** The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from

[1] National Planning Policy Framework - §214
[2] National Planning Policy Framework - §182

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neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

2 **Justified:** The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

3 **Effective:** The Plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities.

4 **Consistent with National Policy:** The Plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Our responses to the Main Modifications are set out below and are considered in the context of the aforementioned tests of soundness in the Framework (2012).

Main Modifications

Main Modification MM/002
The 'Duty to Cooperate'

0363/M/02/C

MM/002 proposes to amend the wording associated with the 'Duty to Cooperate'. Additional paragraphs are proposed which set out that the WCLP does not meet its identified housing need in full. It notes that whilst the Council has sought to engage with neighbouring authorities there has been no firm agreement as to how and where Wyre's unmet need will be provided.

TW considers that the Council should meet its full Objectively Assessed Need [OAN] for housing. Whilst the Council's evidence base seeks to demonstrate that it has effectively cooperated with adjoining authorities, TW disagrees with this assertion and has concerns over the effectiveness of the cooperation during the early stages of plan preparation. This limited engagement with neighbouring authorities has not enabled Wyre to meet its unmet need within the housing market areas [HMA]. Notwithstanding, TW acknowledges the Inspector's decision and is generally supportive of building an early review mechanism into the WCLP to enable the Council to meet its unmet need.

TW is generally supportive of the commitment to an early review provided it is carried out at the appropriate time. TW has concerns that the commencing the partial review so soon after the adoption of the WCLP is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the WCLP and forecasts a realistic timetable for the preparation of a review. Furthermore, in preparing the review of the WCLP, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy.

Overall, TW has some concerns regarding the effectiveness of MM/002 on the premise that the Council has failed to cooperate effectively with adjoining authorities. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the WCLP which has been time expired since 2006.

Tests of Soundness

MM/002 needs to be amended to ensure that it meets the following tests of soundness in accordance with the Framework[3]:

[3] National Planning Policy Framework - §182

1 **Positively Prepared** – The WCLP has not been positively prepared, because it does not seek to meet the full housing OAN.

2 **Effective** – The Council has not cooperated effectively with adjoining authorities. To have cooperated effectively, Wyre would have had to achieve its desired result of delivering its unmet need in the wider HMA. Furthermore, whilst an early review mechanism has been built into the WCLP, the timescales for the preparation of a Local Plan review are unrealistic.

Suggested Change

To ensure that the MM/002 meets the tests of soundness, TW recommends the following amendments:

1 A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review too soon after the adoption of the WCLP;

2 Additional text is provided with MM/002 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.

Main Modification MM/004 Strategic Policies

0363/M/03/C.

MM/004 seeks to amend the introductory text to the Strategic Policies section of the WCLP. The MM sets out that the WCLP will make provision for 97% of its housing OAN. This is an increase from the previous 87% but still presents a shortfall.

Whilst TW supports the measures that have been incorporated in the plan by virtue of the MM to enable the Council to meet the majority of its housing OAN, it has concerns regarding the remaining unmet need. As set out in the response to MM/002, TW supports the Inspector's recommendation to build in an early review mechanism, to enable it to meet its unmet need. TW strongly recommends that additional text is included within MM/004, which set out that the Council will commit to an early review to ensure that it able to meet its unmet need. As part of the review, the Council will seek to engage with authorities in the HMA and will carry out a robust and effective duty to cooperate to ensure it is able to meet its unmet need.

Tests of Soundness

MM/004 needs to be amended to ensure that it meets the following tests of soundness in accordance with the Framework[4]:

1 **Positively Prepared** – The WCLP has not been positively prepared, because it does not seek to meet the full housing OAN.

2 **Effective** – The Council has not cooperated effectively with adjoining authorities. To have cooperated effectively, Wyre would have had to achieve its desired result of delivering its unmet need in the wider HMA.

Suggested Change

To ensure that the MM/002 meets the tests of soundness, TW recommends the following amendment:

[4] National Planning Policy Framework - §182

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1 Additional text is input into MM/004 which sets out that the Council will commit to an early review, and that it will seek early engagement opportunities with the HMA through a robust and effective duty to cooperate to ensure it is able to meet its unmet need.

Main Modification MM/020 Policy CDMP6

0363/M/04/C

MM/020 proposes to amend Part 2 of Policy CDMP6 (Accessibility and Transport) which relates to the provision of Electric Vehicle Charging [EVC] points within new developments. Part 2 is amended to include reference to; 'where practical' developments should make appropriate provision for EVC charging points. TW supports the degree of flexibility that this MM proposes for Part 2 of the Policy. The proposed MM ensures that a sufficient degree of flexibility can be exercised by the applicant and decision taker when considering whether the provision of EVC points are necessary in the context of a development.

Main Modification MM/021 Housing

0363/M/05/C

MM/021 proposes to amend the introductory text to the Housing section of the WCLP. The MM proposes to insert a paragraph which references that the WCLP will seek to ensure a mix of housing is delivered which is commensurate with the identified need. This includes the delivery of housing which is appropriate for older people or people with restricted mobility.

As set out in the representations submitted to the consultation on the WCLP Publication Draft, TW acknowledges the need to provide suitable housing for all age cohorts provided that the identified need is based on robust and sound evidence. The Practice Guidance[5] is clear that authorities *"should take account of evidence that demonstrates a clear need for housing for people with specific housing needs."*

Regarding the delivery of homes which are suitable and capable of meeting the needs for older people, the Practice Guidance states that *"Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling')."*

To ensure that the policy is effective, TW requests that further guidance is provided, which sets out how the Council will work with developers and housing associations to deliver the necessary homes.

Tests of Soundness

MM/021 needs to be amended to ensure that it meets the following tests of soundness in accordance with the Framework[6]:

1 **Effective** – MM/021 does not present a clear guidance as to how the Council proposes to work with developers to ensure that an appropriate mix of housing, to meet identified need is delivered.

Suggested Change

To ensure that the MM/021 meets the tests of soundness, TW recommends the following amendment:

1 Guidance is provided as to how the Council proposes to work with developers and housing associations to deliver the necessary homes which are suitable for older people, and people with restricted mobility.

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[5] National Planning Practice Guidance - ID: 56-005-20150327

[6] National Planning Policy Framework - §182

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Main Modification MM/022 Housing Land Supply

0363/M/06/C

MM/022 seeks to amend the reasoned justification which supports Policy HP1 (Housing Land Supply). The MM sets out an updated housing land supply position for the borough as at the 31st March 2018. The table sets out the components of the supply and their contributions towards borough's overall housing land supply position.

In relation to the proposed windfall allowance, the Framework[7] makes it clear that *"local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens".*

WBC has always delivered units on windfall sites. In the absence of an up to date Local Plan the majority of the Council's supply has taken place on windfall sites. Notwithstanding, WBC is anticipating that windfall sites will only form a small element of future supply once the plan is adopted. TW consider that this is a sensible and robust judgement, given the unreliable nature of supply from windfall sites post adoption of the plan.

Further modifications are proposed under MM/022. This includes additional text which references the Liverpool approach for accounting for previous under delivery in the context of calculating the 5-year housing land supply position. Dealing with past under delivery since the base date of the Plan is necessary for Wyre, however TW has concerns over the direct reference made in the WCLP to the 'Liverpool' method as an approach to managing previous under delivery in the borough. The Framework[8] requires plans to be positively prepared on a strategy which seeks to meet the objectively assessed need. Whilst TW accepts the Inspectors opinion that the Liverpool approach is acceptable and justified at this point in time, it is considered that the 'Liverpool' method for dealing with previous under delivery in the longer term does not reflect this principle. Furthermore, the Practice Guidance[9] states that where authorities are unable to address past shortfalls over a 5-year period, they may need to reconsider their approach to bringing land forward, and the assumptions which they make.

In this regard, TW considers that the reference to the 'Liverpool' method should be omitted from the WCLP. This is on the basis that the 'Liverpool' method undermines the principles of the Framework which requires development plans to be positively prepared and meet their objectively assessed need.

Tests of Soundness

MM/022 needs to be amended to ensure that it meets the following tests of soundness in accordance with the Framework[10]:

1 **Positively Prepared** – The reference to the Liverpool approach is omitted from the MM.

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[7] National Planning Policy Framework - §48

[8] National Planning Policy Framework - §182

[9] National Planning Practice Guidance – ID: 3-044-20180913

[10] National Planning Policy Framework - §182

LICHFIELDS

Suggested Change

To ensure that the MM/021 meets the tests of soundness, TW recommends the following amendment:

1 MM/022 is amended to omit reference to the Liverpool approach.

Main Modification MM/023 Policy HP1

0363/M/07/C

MM/023 proposes to amend the wording of Policy HP1 (Housing Land Supply), which sets out that a 'minimum' of 9,285 net additional dwellings will be delivered over the plan period which equates to 'at least' 464 dwellings per annum.

TW supports the references to 'minimum' and 'at least' in the context of delivering the housing requirement. As the WCLP is only proposing to meet 97% of its identified housing OAN, it is important that the housing requirement is seen as an absolute minimum figure. 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 housing OAN in full. This will ensure that the WCLP is considered positively prepared in the context of the Framework[11], and that it is seeking to meet its OAN in full.

Main Modification MM/024 Housing Mix

0363/M/08/C

MM/024 proposes to amend the reasoned justification associated with the Policy HP2 (Housing Mix). The MM seeks to provide flexibility in relation to the requirements for new developments to make provision for the ageing population and people with restricted movement. Text has been included into the reasoned justification which states:

> *"The Policy does not seek to impose any specific Building Regulation 'optional standards' but instead provide a flexible framework for the provision of appropriate housing to cater for the needs of ageing population and people with restricted mobility"*

TW supports the degree of flexibility which has been incorporated into the reasoned justification of Policy HP2. The proposed MM will ensure that the Policy is effective, in the context of the Framework[12] whilst retaining a degree of flexibility in the provision of appropriate housing, capable of meeting the need for older people, and those with restricted mobility.

Main Modification MM/065 Site SA1/16 – West of Cockerham Road, Garstang

0363/M/09/C

MM/065 amends the boundaries and increases the capacity of draft allocation SA1/16. The Site is now identified as having the capacity to deliver 260 dwellings. TW strongly supports this MM, and the extension of the allocation boundary and the inclusion of land to the north and west. As proposed, the allocation will see the release of a well contained and logical parcel of land from the open countryside, which presents the opportunity to deliver a sustainable, residential extension to Garstang. The extension of the allocation boundary enables the site to deliver an additional 160 dwellings, which would make a significant contribution towards meeting the need for market and affordable housing within the borough.

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[11] National Planning Policy Framework - §182

[12] National Planning Policy Framework - §182

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TW supports the inclusion of additional text into Development Consideration 8, which states:

> *"If the Local Planning Authority is satisfied that land is not needed as a result of approved school expansions to provide sufficient additional places at local primary schools to address the impacts of developments in Garstang and surrounding area, a contribution should be made towards the expansion of existing school."*

As set out in the response to the MIQs, TW commissioned an Education Report to assess the capacity of the existing primary schools within the catchment area for the site. The closest primary school to the Site is Garstang Community Primary. This school is set on 2.5ha site which is considered large enough to accommodate a three-form entry school that has the capacity to accommodate up to 630 places. Furthermore, the report goes on to evidence that there is a combined surplus capacity of 73 primary school places within Garstang Community Primary School, Garstang St Thomas Primary School and, St Mary's and Michael's Primary. When utilising LCC's Child Yield multipliers this number of pupils is the equivalent of 192 new four-bedroom dwellings, or 456 new three-bedroom dwellings.

Given the existing potential capacity within Garstang Community Primary, and its capability of being expanded, securing financial contributions towards its upgrading is a far more effective way of meet the identified need, than developing and creating a standalone single form entry new school. Extending Garstang Community Primary School would be more logical than delivering an entirely new and separate school. Namely, the necessary infrastructure is in place to facilitate its operation together with a management system. Furthermore, it would be difficult to establish a new school in such proximity to Garstang Community Primary School which is already well established.

In this context, it is not necessary to expect the Site to make the provision of land for a primary school. There is no evidence to justify why land for a new primary school needs to be made available on the Site. Furthermore, there is existing capacity within other primary schools included within the catchment area, and there is the opportunity to extend Garstang Community Primary, utilising contributions made from S.106 Agreements.

Tests of Soundness

MM/065 needs to be amended to ensure that it meets the following test of soundness in accordance with the Framework[13]:

1 **Effective** – Development consideration 8 is not effective as it is clear that a new primary school is not necessary on the site, give existing capacity and the ability to extend Garstang Community Primary.

Suggested Change

To ensure that the MM/065 meets the tests of soundness, TW recommends the following amendment:

1 MM/065 is amended to read:

> *"A financial contribution is made towards the expansion of Garstang Community Primary School"*

[13] National Planning Policy Framework - §182

LICHFIELDS

Main Modification MM/090 Policy LPR1

0363/M/10/C

MM/090 proposes to add a new policy – Policy LR1 (Wyre Local Plan Review). The Policy sets out that the Council will be required to bring forward a partial review of the WCLP with the objective to meeting its housing OAN in full. It sets out that the review must commence before the end of 2019, with submission and examination by early 2022.

As set out in response to MM/002 and MM/004, TW has concerns regarding the Council's unmet need. However, it supports the Inspector's recommendation to build an early review mechanism into the WCLP as a measure to ensure that the Council can address its unmet need. This is on the premise that an early review is carried out at the appropriate time. TW has concerns that commencing the partial review straight so soon after adoption is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the WCLP and forecasts a reasonable timetable for the preparation of a review. Furthermore, in preparing the review of the WCLP, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy.

Overall, TW has some concerns regarding the effectiveness of MM/090. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the WCLP which has been time expired since 2006.

Tests of Soundness

MM/090 needs to be amended to ensure that it meets the following tests of soundness in accordance with the Framework[14]:

1 **Effective** – The Council has not cooperated effectively with adjoining authorities. To have cooperated effectively, Wyre would have had to achieve its desired result of delivering its unmet need in the wider HMA. Furthermore, whilst an early review mechanism has been built into the WCLP, the timescales for the preparation of a Local Plan review are unrealistic.

Suggested Change

To ensure that the MM/090 meets the tests of soundness, TW recommends the following amendments:

1 A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review immediately, post adoption of the WCLP;

2 Additional text is input into MM/090 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.

Main Modification MM/103 Site SA1/16 – West of Cockerham Road, Garstang

0363/M/11/C

MM/103 amends the draft allocation boundary of SA1/16 to include land the land to the north and west. As set out in the response to MM/065, TW strongly supports the extension of the allocation boundary and the inclusion of land to the north and west. As proposed, the allocation will see the release of a well contained

[14] National Planning Policy Framework - §182

parcel of land from the open countryside, which presents the opportunity to deliver a sustainable, residential extension to Garstang. The extension of the allocation boundary enables the site to deliver an additional 160 dwellings, which would make a significant contribution towards meeting the need for market and affordable housing within the borough.

It is considered that the extension of the draft allocation boundary is justified, as it will see the release of a well contained site, with no overriding technical or environmental constraints, and can be delivered within the first 5 years of the plan period. The MM is considered effective as it will ensure that the WCLP is able to meet a higher percentage of its OAN than originally proposed in the Publication Draft. It is considered that the proposed MM meets the tests of soundness as set out in the Framework[15].

Conclusion

Overall, whilst TW broadly supports the provisions of the WCLP, it has concerns regarding the soundness of the MM for the reasons stated. TW requests that the suggested changes set out within this letter are taken into account by the Council when amending the WCLP. TW welcomes further engagement with the Council as part of the preparation of the WCLP. Should the Council have any questions, or wish to discuss the details included within this letter further, please do not hesitate to contact either myself or my colleague Brian O'Connor.

Yours faithfully

[15] National Planning Policy Framework - §182

0385/m101/GC

Phillips, Daniel

From: Crompton, Rachel <[redacted]>
Sent: 15 October 2018 13:14
To: Policy, Planning
Cc: Graham, Alistair
Subject: Ref ID: 0385 Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Team,

Thank you for this invitation to review your proposed modifications.

Having worked through them with our District Lead Officer last week from the lead local flood authority perspective, I can now confirm that we've no comments to make.

Best wishes,

Rachel

Rachel Crompton
Flood Risk Manager
Community Services
Lancashire County Council
T: [redacted]
M: [redacted]
www.lancashire.gov.uk

From: Policy, Planning [mailto:Planning.Policy@wyre.gov.uk]
Sent: 11 September 2018 11:18
To: Crompton, Rachel [redacted]>
Subject: Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Dear Sir/Madam

Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Personal Local Plan ID: 0385

In September 2017 the council undertook a six week public consultation on the Publication Draft Wyre Local Plan. In response, the council received representations from 763 individuals and organisations.

The council submitted the Plan to the government on 23 January 2018 which was the start of the Local Plan Examination. Public hearings held from 15 May 2018 to 5 June 2018. In response to issues raised within the representation and by the Examination Inspector, and taking into account the Inspector's Post Hearings Advice, published in July 2018, Main Modifications to the Local Plan are now proposed.

The council is now inviting representations on the Main Modifications to the Publication Draft Wyre Local Plan and the accompanying Sustainability Appraisal Addendum 2018 over a six week period from **12 September 2018 to 5.00pm 24 October 2018.**

C/o De Pol Associates

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received	24/10/18	Rep. No.	0398/M/01-02/BLC

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?

Yes ☑ No ☐ 0398/M/01/B1

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation.

Main Modification Reference	**MM/ 057**

Paragraph or Policy Reference	policy SA1/8

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☑

0398/M/02/C

For Office Use Only: Date Received		Rep. No.	

If YES please provide additional information below if you wish. If NO please answer question 3b.

Please fill out Part F if you need additional space

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☑

Not justified ☑

Not effective ☐

Not consistent with national planning policy ☑

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received		Rep. No.	

Please provide precise details of why you believe this Main Modification is not sound:

The Inspector's Post Hearing Advice Note recommends in paragraph 27 that allocation SA1/8 is in an accessible location within walking distance of the town centre and railway station. That there is scope to provide walking and cycling links across the site, which combined with Green Infrastructure would make walking and cycling from the site and other areas to the north and west of the site more attractive. It also states that a larger number of houses would allow a greater contribution to the Poulton-le-Fylde Highway Mitigation Strategy and off-site sustainable transport measures. Moreover, the recomendation is that notwithstanding the highways cap, the Council should reassess the capacity of the allocation and take the opportunity to make best use of the site, increasing the numbers to be delivered.

The main modification has conseqently increase the dwelling capacity from 154 to 300 dwellings. However, there are constraints affecting the site with regards to flood risk, the railway line and the need to provide land for a new primary school and a car park, which may constrain deliverability on this land. This could be resolved by extending the allocation to include the land to the north west, as shown edged in red on the attached plan.

Even if the current allocation is able to deliver 300 dwellings, at paragraph 7 the Inspector's Advice Note states that the highway evidence informing the suggested caps to housing is based on a high level desktop assessment, without robustly modelling the effectiveness of new transport infrastructure in limiting impacts of development. It is understood from the highway evidence informing the suggested caps, that the majority of Lancashire County Council's (LCC) highway concerns also relate to the south of Poulton-le-Fylde and in particular along the A586 corridor. Given that the majority of site allocations are located in this area LCC have not given significant consideration to highway operation to the north of Poulton-le-Fylde. The location of the suggested expansion land is such that traffic is likely to distribute north towards the A585 rather than south along the A586 corridor and there is no published evidence of substantial network issues in the immediate vicinity of the site. Bearing in mind that the Local Plan as modified is still not delivering the full OAN for housing, an even greater amount of housing would therefore be appropriate in this location, delivered through this extension to the current allocation boundary.

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

The extension of the boundary to allocation SA1/8 to include land to the north west, as shown on the attached plan, together with a corresponding increase in the number of dwellings to be delivered from this allocation.

For Office Use Only: Date Received		Rep. No.	

PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below.

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes ☑ No ☐

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

For Office Use Only: Date Received		Rep. No.	

Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

To promote our client's allocation and provide details on delivery and the status of survey work.

Please fill out Part F if you need additional space

Submitting your representation

Representations can be submitted using the on-line form which can be accessed and completed on-line at www.wyre.gov.uk/localplan

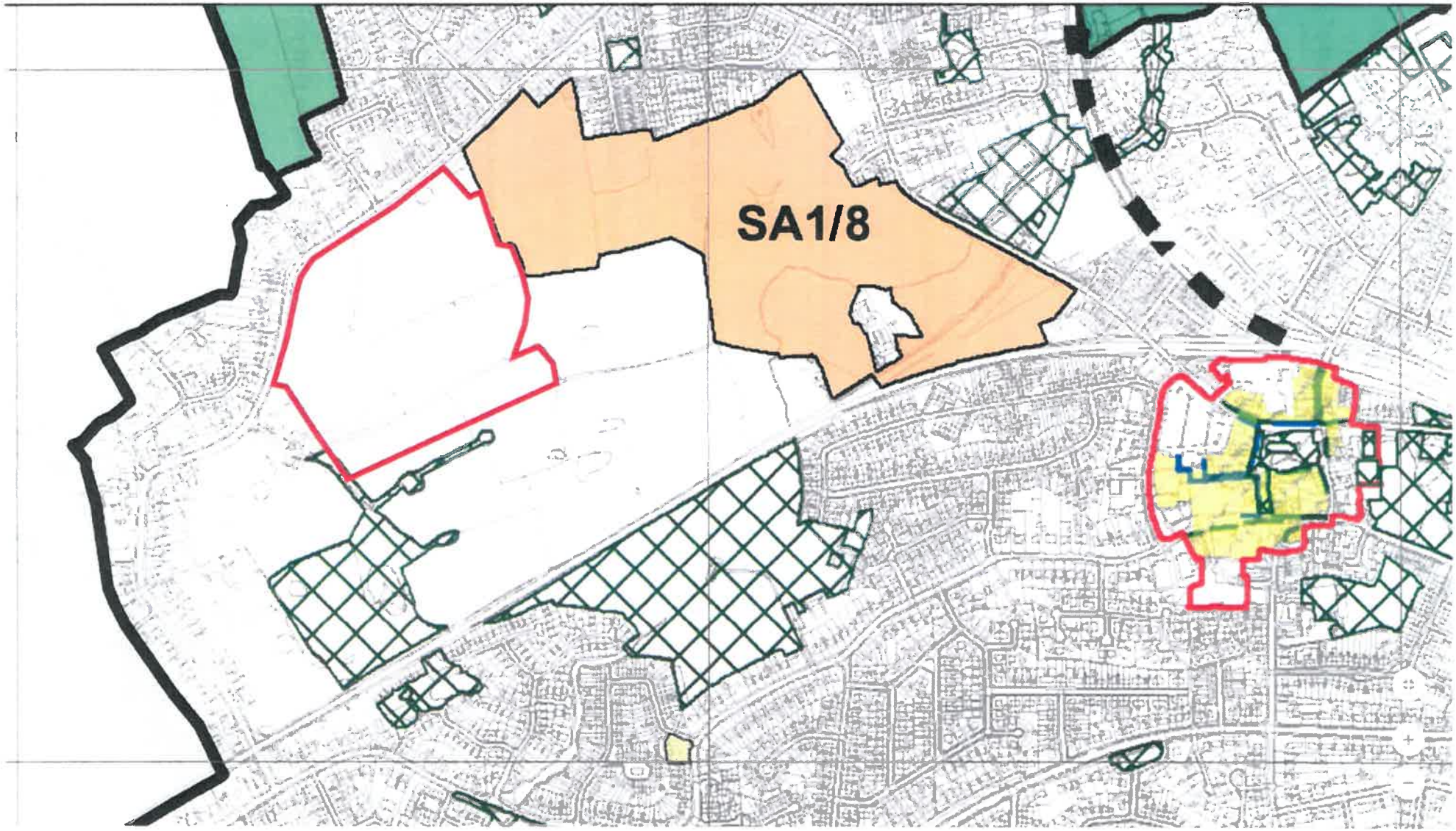
The representation form can also be downloaded from www.wyre.gov.uk/localplan

The completed form can be submitted by:

e-mail at planning.policy@wyre.gov.uk or
Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

If you would like assistance in completing your representation or have any other questions about the emerging Wyre Local Plan, please contact the Planning Policy Team by e-mail planning.policy@wyre.gov.uk or by telephone on 01253 887235 or 01253 887231. Forms **must be received by 5pm on 24 October 2018. Late representations CANNOT be accepted.**

In submitting the form, you understand that the information given is to the best of your knowledge correct.



Proposed extension to allocation SA1/8

Cabus Parish Council

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received	23/10/18	Rep. No.	0458/01-03/Bl.C

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? 0458/M/01/B1

Yes X☐ No ☐

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation.

Main Modification Reference	MM/065 & MM/103

Paragraph or Policy Reference	MM/065 Amend Site Area to read: "~~5.81~~ 14.52 Hectares" Amend Site Capacity to read: "~~100~~ 260 dwellings" MM/103 Amend Settlement Boundary (SP1), Strategic Area of Separation (SP1), Countryside Are (SP4 and Mixed Use Development (SA3)

MM/065 - 0458/M/02/C

MM/0103 - 0458/M/03/C

For Office Use Only: Date Received		Rep. No.	

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☐X

If YES please provide additional information below if you wish. If NO please answer question 3b.

Please fill out Part F if you need additional space

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☐

Not justified X

Not effective ☐

Not consistent with national planning policy ☐

For Office Use Only: Date Received		Rep. No.	

Please see Part F.

Please provide precise details of why you believe this Main Modification is not sound:

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

For Office Use Only: Date Received		Rep. No.	

MM/065

Amend Site Area to read – as per original draft: "5.81 ~~14.52~~ Hectares"

Amend Site Capacity to read – as per original draft: "100 260 dwellings"

MM/103

Amend Settlement Boundary (SP1), Strategic Area of Separation (SP1), Countryside Are (SP4 and Mixed Use Development (SA3)

PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

For Office Use Only: Date Received		Rep. No.	

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below.

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes X☐ No ☐

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

For Office Use Only: Date Received		Rep. No.	

Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

Please fill out Part F if you need additional space

Submitting your representation

Representations can be submitted using the on-line form which can be accessed and completed on-line at www.wyre.gov.uk/localplan

The representation form can also be downloaded from www.wyre.gov.uk/localplan

The completed form can be submitted by:

e-mail at planning.policy@wyre.gov.uk or
Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

If you would like assistance in completing your representation or have any other questions about the emerging Wyre Local Plan, please contact the Planning Policy Team by e-mail planning.policy@wyre.gov.uk or by telephone on 01253 887235 or 01253 887231. Forms **must be received by 5pm on 24 October 2018. Late representations CANNOT be accepted.**

In submitting the form, you understand that the information given is to the best of your knowledge correct.

For Office Use Only:	Date Received		Rep. No.	

PART F – ADDITIONAL INFORMATION

ONLY use this part of the form if you require additional space to complete your representation to the questions listed in parts B to E of the representation form. Please attach a separate sheet for each question.

Please add your personal ID number (if known) 0458

Personal Details		**Agent Details (if applicable)**	
First Name	Louise	First Name	
Last Name	Banton	Last Name	
Organisation (if relevant)	Cabus Parish Council	Organisation	

Which question are you adding additional information to?	
If additional information is in relation to Part B or C, please state the relevant Main Modification reference number and relevant paragraph or policy reference.	**MM/065 & MM/103** **MM/065** **Amend Site Area to read: "~~5.81~~ 14.52 Hectares"** **Amend Site Capacity to read: "~~100~~ 260 dwellings"** **MM/103** **Amend Settlement Boundary (SP1), Strategic Area of Separation (SP1), Countryside Are (SP4 and Mixed Use Development (SA3)**

Additional Information:
Whilst we note the Planning Inspectorate's comments as follows:

Site SA1/16 – West of Cockerham Road, Garstang
32.The development may need to deliver a primary school. In this respect it is questionable whether sufficient land has been allocated to allow delivery of the school and 100 dwellings. Moreover for the reasons given in paragraph 7-9 and based on the existing highways evidence base there is scope for a modest increase in housing delivered in Garstang. Additional land to the west of the allocation is well-contained and could be considered to not have significant landscape attributes. The technical constraints identified in the SHLAA (access, electricity lines, public right of way) can be overcome by master planning. Questions were raised about delivery at the hearings but the larger site is being promoted by a national housebuilder. I recommend the extension of the allocation so that it has an overall capacity of 200+ dwellings (MM).

For Office Use Only: Date Received		Rep. No.	

We also note the following: -

1. The response of Wyre Borough Council with regards to the requirements in respect to the delivery of a primary school in this location: "*If the Local Planning Authority is satisfied that land is not needed....., a contribution should be made towards the expansion of existing schools.*"

2. The response of Wyre Borough Council (letter dated 4 October 2018) to the Planning Inspectorate's letter dated 1 October 2018 in which Wyre Borough Council rejects the use of the latest (ONS 2016) Household Projections in favour of the existing 2014-based Projection. The 2016 projections suggest reduced household growth in Wyre by some 12.5% (668 households over the period 2011-2031) compared with the 2014-based projections.

3. That Cabus Parish Council has responded thus to previous consultations concerning SA1/16:

   Draft Local Plan Consultation response Oct 2017:

   "Site allocation at SA1/16 by Six Ways crossing. As per the 2015 Local Plan Issues and Options Paper Consultation response - this site, within Cabus, remains inappropriate for development as it is a virgin greenfield site with no utilities and development here will contribute to the infrastructure challenges which already exist."

   Issues and Options Consultation response July 2015:

   "Area 10_97 - virgin Greenfield site within no utilities" – this was the original site allocation which reflects the same amount of land designated for potential development as MM065, but which was reduced in size as a result of that consultation (to 5.81 Hectares). Area 10_97 became SA1/16 in the Draft Local Plan).

We are disappointed that Wyre Borough Council has amended the Settlement Boundary to the West of Cockerham Road to accommodate an increase to the site allocation area of SA1/16 (from 5.81 to 14.52 Hectares) and site capacity (from 100 to 260 dwellings).

We feel there is a justified argument to be made NOT to include MM/065 and MM/103 on the following basis:

1. that the latest (2016) Household Projections suggest a 12.5% reduction compared with the 2014-based projections – the proposed site capacity increase from 100 to 260 is excessive and unnecessary
2. that it is highly unlikely that the delivery of a new Primary School would ever materialise on SA1/16, even if the suggested justification for increasing the site area is to accommodate such a facility
3. *"The larger site is being promoted by a national housebuilder"*. Clearly the Planning Inspectorate has access to information which we, as consultees, don't - but the wishes (or promotional activities) of national housebuilders should not be dictating our site allocations for Local Planning purposes

P Barnett C/O Emery Planning

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received	24/10/18	Rep. No.	0473/M/01-03/B1 C+D

PART B – LEGAL COMPLIANCE (MAIN MODIFICATIONS AND SUSTAINABILITY APPRAISAL ADDENDUM 2018 ONLY)

Q1 Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?

Yes ☑ No ☐ 0473/M/01/B1

Please provide your comment on legal compliance below. If you consider the Main Modifications to the Local Plan and/or Sustainability Appraisal Addendum 2018 not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific Main Modification reference numbers if required.

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

Q2 To which Main Modification does your representation on soundness relate? Please insert the relevant references in the boxes provided below. Please use a separate Part C continuation form for each additional Main Modification representation.

Main Modification Reference	MM/ 05

Paragraph or Policy Reference	SP1

0473/M/02/C

Q3a Do you consider this Main Modification to be "sound"?

Yes ☐ No ☑

For Office Use Only: Date Received		Rep. No.	

If YES please provide additional information below if you wish. If NO please answer question 3b.

Please fill out Part F if you need additional space

Q3b If you do <u>not</u> consider this Main Modification to be sound, please specify on what grounds (see guidance note for additional information):

(Please tick one or more boxes as appropriate)

Not positively prepared ☑

Not justified ☐

Not effective ☑

Not consistent with national planning policy ☑

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received		Rep. No.	

Please provide precise details of why you believe this Main Modification is not sound:

A key test of soundness is whether the site selection process is sound and whether the site allocations will meet the development requirements.

The modifications to the Local Plan respond to the Local Plan Inspectors Report and his comments with regard to the failure to ensure that the identified objectively assessed housing need (479dpa) is met in full. The Inspector raised concerns that the highways evidence has not justified the Councils constrained approach to meeting the OAN through the Local Plan.

Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. The Local Plan as amended would now seek to deliver 9,285 dwellings over the plan-period and this would equate to 464 dpa; there would remain a shortfall of 295 dwellings over the plan-period in terms of the OAN. This means that the identified needs of 295 households would not be met through the local Plan, which is a significant shortfall.

The shortfall of 295 households should be seen within the context of the Boroughs significant affordable housing needs, which equate to between 134 and 189 affordable houses per annum as set out through the SHMA. There is also a significant need for older persons accommodation which is not met by the plan.

Please fill out Part F if you need additional space

Q3c Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording. Please fill out Part F if you need additional space.

We consider further sites should be allocated. Our client considers that their land would be appropriate. Their recent outline planning permission was for the creation of a retirement village that will provide 200 no. one and two bed assisted living dwellings with access applied for off the A6 Preston Lancaster New Road (all other matters reserved).

The retirement dwellings proposed fall within Class C3 of the Use Classes Order. 30% of the proposed units would be provided as affordable housing (60 units). However the application was refused (Ref: 17/00743/OULMAJ) solely on sustainaibilty and landscape impact. We consider both issues can be overcome particularly as greenfield land is required.

With regard to traffic generation due to ongoing capacity issues on the wider A6 corridor, LCC have requested that the occupancy age from the development is limited to a minimum age of 70. The assumption being that many residents of this age would not be working or making visits to / from the site at peak times and thus not materially impacting on the local highway network at peak times. The Appellant is willing to accept this minimum age requirement and this can be secured by way of condition. Therefore these 200 dwellings can come forward without any highway support.

It is noted that the officer report for 17/00743 states:

"In terms of the Emerging Wyre Local Plan, the site was identified at the Issues and Options stage as having potential for development. It was identified as being suitable for housing. As set out above, the Council needs to identify land in order to meet its housing and associated needs and this will require the development of greenfield sites on the edge of existing settlements. Linked to the highways evidence provided for the Emerging Local Plan, the A6 corridor within Wyre between Barton and Cabus can only accommodate a finite level of additional residential development beyond those sites already committed / with planning permission. Subsequently not all sites identified at the Issues and Options stage, including this one, were taken forward and proposed for allocation in the Submission Document. This site is not therefore identified in the Emerging Local Plan as being required to deliver the Council' s housing need over the plan period to 2031. Nor is it identified to meet any other need, including employment."

Clearly that posiiton has changed and therefore we submit this representation for consideration going forward.

A location and illustrative plan is attached.

For Office Use Only: Date Received		Rep. No.	

PART D – SUSTAINABILITY APPRAISAL ADDENDUM 2018

Q4 – If you wish to comment on the Sustainability Appraisal Addendum 2018 please make your representation below. 0473/M/03/D

The Addendum Sustainability Appraisal considers the OAN and reasonable alternatives at Section 2 of the document (pages 2 and 3). In Section 1, the document suggests that the Council has identified a 464dpa figure as the housing requirement on the basis that it falls within the 'OAN range'. However, the Council and the Local Plan Inspector have both identified the OAN for Wyre equates to 479dpa. It should be made clear that the 464dpa figure falls short of the full OAN and would result in the needs of 295 households not being met over the plan-period.

We are not aware of any reasoned justification for the 464 dpa figure.

Section 2 of the Sustainability Appraisal Addendum discusses two reasonable alternatives to the 464dpa figure i.e. the OAN in full of 479dpa and 457dpa. The Environmental, Social and Economic impacts are discussed and a summary is provided and this concludes that the differences between the three scenarios are 'very small'; on this basis the 464dpa approach is endorsed as it would provide a: 'sufficient quantity of development in rural locations to potentially enhance the vitality of small village centres whilst providing good scope for avoiding more severe impacts on natural environment Objectives."

We do not consider that the failure to meet the needs of 295 households would result in very small impacts. We consider that the failure to meet the needs of these households would result in significantly adverse impacts in terms of the social and economic roles of sustainable development.

The failure to meet the needs of 295 households would have significantly adverse social consequences for those identified households, and it would exacerbate adverse market signals across the Borough as supply falls short of meeting identified needs e.g. affordability ratio and house prices.

The failure to the meet the needs of 295 households would result in significantly fewer affordable units over the plan-period (89 affordable units based upon 30% provision), and this should be seen within the context of the Boroughs identified affordable housing needs (i.e. between 134 and 189 dpa as per the SHMA) and would have adverse social consequences. There is also a signifiacnt need for older persons which needs to be provided for.

Section 2 of the Sustainability Appraisal Addendum does not make any reference to the advantages or disadvantages of addressing the shortfall of 295 dwellings over the plan-period. With regard to social impacts, the document only discusses the potential for development supporting local services and 'accessibility' to services and the economic impacts are only discussed within the context of the vibrancy and vitality of rural settlements. This falls short of a proper assessment of the likely impacts arising from the reasonable alternatives.

It is not considered that the Sustainability Appraisal Addendum provides a sound basis for assessing the likely effects arising from such scenarios or justificiton for not meetung the OAN of 479 dwellings.

Please fill out Part F if you need additional space

PART E – NEXT STEPS

Q5a Do you wish to participate at an oral part of the examination if the Inspector considers that further hearings are necessary?

Yes ☑ No ☐

Please note that the process for undertaking the examination, including subjects/matters to be addressed and participants, will be decided by the Inspector.

For Office Use Only: Date Received		Rep. No.	

Q5b If you wish to participate at an oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

We have raised a number of fundamental concerns on meeting the development requirement and our client's site is well placed to asisst in meeting that need.

Please fill out Part F if you need additional space

Submitting your representation

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The representation form can also be downloaded from www.wyre.gov.uk/localplan

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e-mail at planning.policy@wyre.gov.uk or
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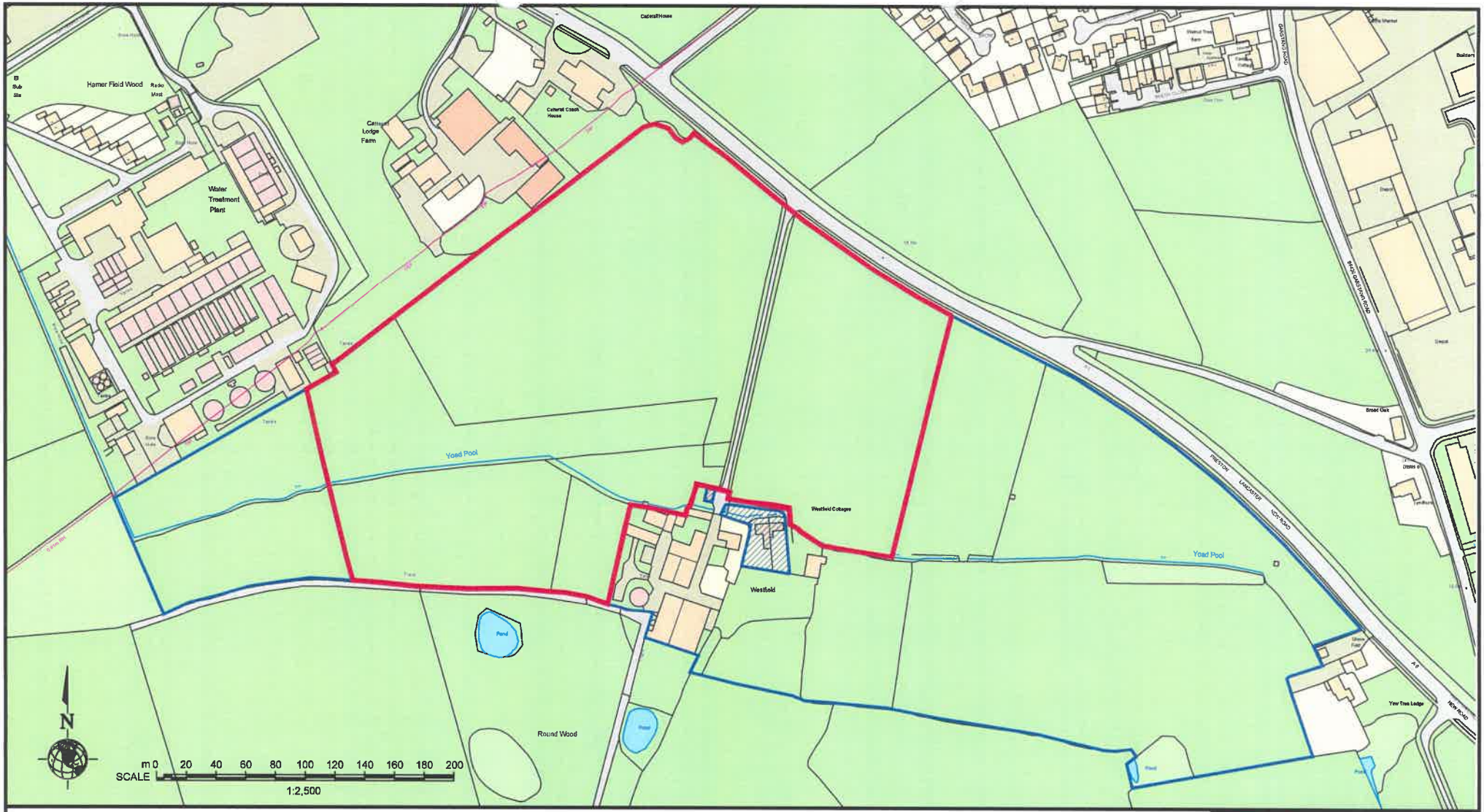


AREA NOT WITHIN CLIENT OWNERSHIP

LOCATION PLAN

WESTFIELD FARM, PRESTON LANCASTER NEW ROAD, CATTERALL, PRESTON, PR3 0PU

GA ASSOCIATES
2 CROSTON VILLA
HIGH STREET
GARSTANG
PRESTON
PR3 1EA
T: 01995 604514
E: Info@GrahamAnthonyAssociates.com
W: www.GrahamAnthonyAssociates.com

MR BARNETT

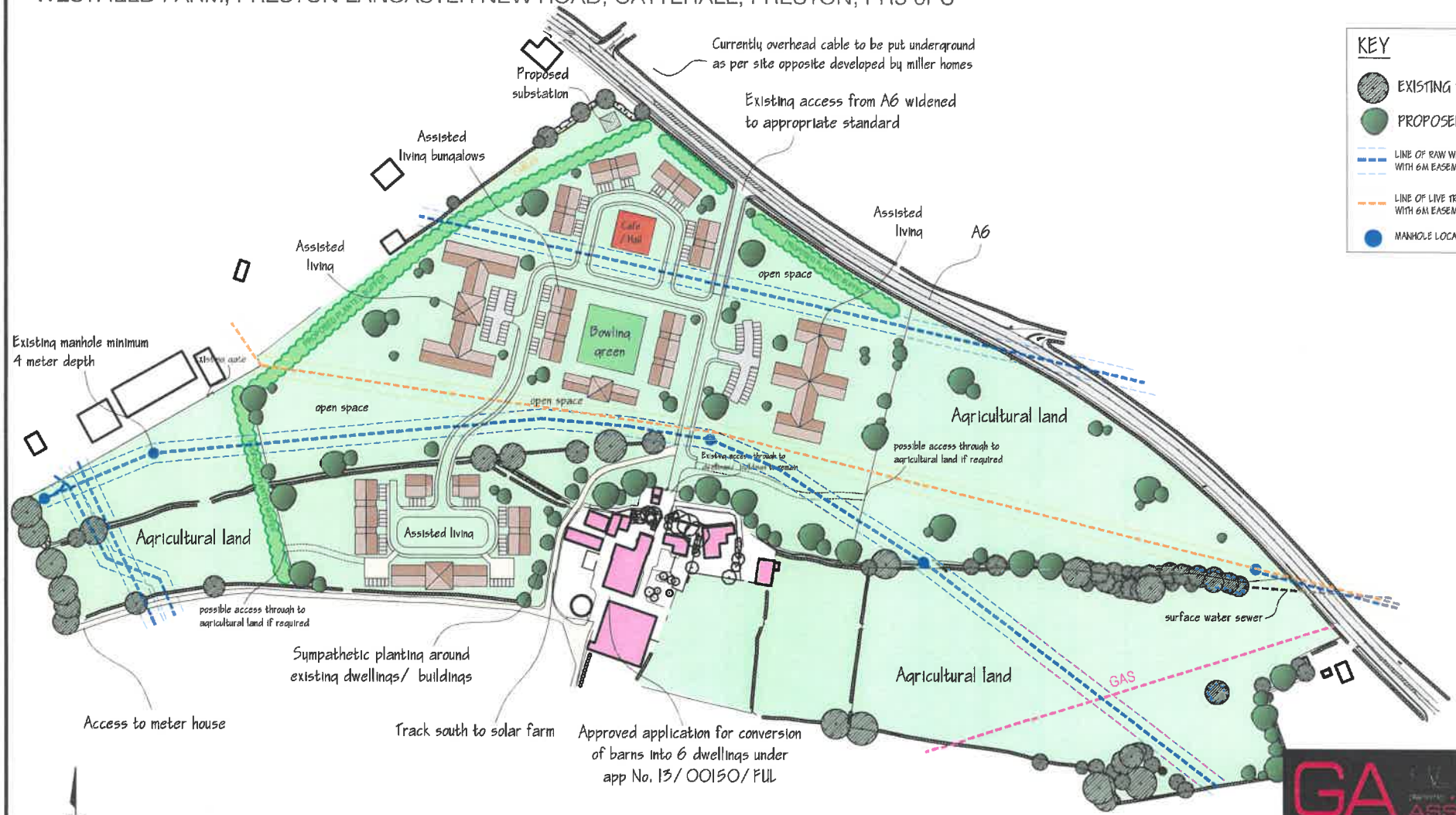
PLANNING PURPOSES ONLY

LOCATION PLAN
WESTFIELD FARM, PRESTON LANCASTER NEW ROAD,
CATTERALL, PRESTON, PR3 0PU

GA3047-LP-01	1:2500 (A3)	MAY 17

PROPOSED SITE PLAN

WESTFIELD FARM, PRESTON LANCASTER NEW ROAD, CATTERALL, PRESTON, PR3 0PU



GA ASSOCIATES

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PR3 1EA

T: 01995 604514
E: info@GrahamAnthonyAssociates.com
W: www.GrahamAnthonyAssociates.com

MR BARNETT

PLANNING PURPOSES ONLY

PROPOSED SITE PLAN
WESTFIELD FARM, PRESTON LANCASTER NEW ROAD,
CATTERALL, PRESTON, PR3 0PU

GA3047-PSP-01-C | 1:2500 (A3) | MAR '17

0545/M/01-18/C, GC

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	6
Response Date	22/10/18 14:15
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mrs
First name (required)	Edwina
Last name (required)	Parry
Organisation (if relevant)	Garstang Town Council
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

	Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database
Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant?	Yes
Main modification reference, MM:	Reference will appear in the text
Paragraph or policy reference:	Reference will appear in the text
Do you consider this main modification to be "sound"?	No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

DRAFT WYRE LOCAL PLAN –PROPOSED MAIN MODIFICATIONS.

PUBLIC CONSULTATION REPRESENTATION FORM PART C SOUNDNESS (MAIN MODIFICATIONS ONLY)

RESPONSE INTRODUCTION.

Section 1.3 of the Publication Draft suggests that the Plan should be read as a whole and we are taking that opportunity. Every development on the A6 corridor is of significant interest to Garstang and its limited infrastructure.

0345|m|01|c

MM/002. Section 1.4, Duty to Cooperate. There is no mention in the schedule of Main Modifications of any movement since 14 November 2017 demonstrating that Lancaster or Preston are prepared to assist towards meeting the Councils housing needs. On the contrary it is likely that Wyre is informally assisting its neighbouring cities.

0545|m|02|GC

Section 2 Spatial Portrait. 2.4.4. SHMA notes there is a shortage of smaller properties yet eye witnesses attest to seeing developers advertising 3/4/and 5 bedroom houses. There should be a requirement to have regard to SHMA.

2.9.2 An identified challenge is accommodating growth and change with high quality design which responds positively to local character and new development that is integrated with its surroundings and creates a sense of place and protects local distinctiveness and heritage.

The opportunity to explain practical measures has not been taken.

Section 3. The vision is one of balancing sustainable growth and environmental considerations.

3.2.13. Outside the Peninsula, rural areas continue to thrive and retain their character. "Garstang is a vibrant Market Town servicing surrounding rural areas. Growth in some areas has been accommodated in sensitive ways."

Modifications might have included examples of what "character" and "sensitive" growth would look like.

LOCAL PLAN STRATEGY.

0545/m/03/c

MM/003. Section 4.1.11. It is disputed that the strategy is "managed"; it is expedient or more colloquially trying to pour a quart into a pint pot. It does not sit easily with the Vision Statement. 4.4 4. The strategy envisages that an essential characteristic is the multiplicity of settlements each with its own identity. This historic environment contributes to the character of the place and fosters community spirit. Nobody could disagree with this aspiration but the reality of heavy development increased by the Modifications does not sit easily with it and is unlikely to receive public approval. MM/004 the provision of development 0545/m/04/c
in the A6 corridor is increased but little attempt at providing high technology employment which will 0545/m/05/c
retain the workforce in Wyre. MM/005 states that new build development will take place within, existing, settlement boundaries. The increase of dwellings will automatically extend settlement boundaries until the draft plan is produced in the next decade. We wish to see evidence that settlement boundaries 0545/m/06/c
have not been breached.MM/006,SP2, requires that all development "contributes positively to overall physical, social, environmental and economic character of the area in which the development is located" without explaining in practical terms how this might be achieved and measured. MM/009 para 5.5, 0545/m/07/c
Countryside areas, the new wording stresses the open and rural character of the countryside is intrinsic to the identity of and sense of place. Enshrined in SP4. A string of development along the west of the A6 between the Cockerham Road and Longmoor Lane will soon obscure the once peaceful rural setting by the combined impact of over 500 dwellings and a convenience store. Residents are unlikely to accept the justification. There must be a more imaginative solution to the location of new housing. Appendix E demonstrates that the Borough is becoming two regions separated by acres of unbuilt, sparsely populated mid- lands where a town the size of Milton Keynes could be dropped into without anybody noticing. All that is preventing a long term solution is the limit of our imaginations. SP 8, 0545/m/08/c
Health MM/013. There is a lacuna specifying what "public health" issues that development might adversely have impact on. The authors of the report must have an idea what they are thinking of and we need to know.

CORE DEVELOPMENT MANAGEMENT POLICIES

0545/m/09/c

1 Flood risk and Surface water management. MM/015. It is generally known by those in Flood Prevention Groups that these schemes are not managed strictly following the completion of the development. A legally binding and, importantly, enforceable, agreement must be written into 0545/m/10/c
any scheme. CDMP 4, Point 15, MM/018, "development will have no unacceptable cumulative impact on landscape character "within or outside settlement boundaries" etc. Any restriction is welcome but the definition and examples of "unacceptable cumulative impact" needs to be fleshed out so that residents can measure these impacts. We argue that developments such as the Cockerham Road and Nateby Fields that combine to form 500 new families, 1,000 extra cars and associated movement is a prime example of what this policy is designed to prevent.

0545/m/11/c
HOUSING; MM/021 Section 7.1.4. The Local plan seeks to ensure a mix of housing. We have mentioned earlier that developers are now advertising along the A6 3/4/5 bed homes which will not satisfy the need for smaller homes for young families.

0545/m/12/c
HP3 Affordable Housing. MM/026. We support the revised policy that these dwellings need to be integrated into the development and subject to conditions in Planning Consents that are inflexible.

Section 7.9. Accommodation for Travelling Showmen. Mm/031 and MM/032 0545/m/13/c

Although not in Garstang Parish, Conway is situate at the Northern Toll Bar and the entrance to Garstang. We naturally wish to see strict screening conditions that are enforced to ensure that the site is not in conflict with its essential rural surroundings. The present site at Utopia Park is a mix of caravans and motor homes and large HGVs and trailers carrying fairground equipment and is open to view from the River Wyre footpath.

Section 8 ECONOMY. MM/036 to MM/046 0545/m/14/GC

Garstang is the only Key Service Centre and Main Town in the Rural Area. The nearest equivalents are Poulton le Fylde in the West, Fulwood, Preston in the South and Scotforth Lancaster in the North all ten miles or so distant. There are 4 Rural Service Centres in central rural together with several rural settlements either straddling the A6 or just off. The A 6 is their lifeline to Garstang for medical matters, library professional services and a variety of shops and super stores and the only secondary school located in neighbouring Bowgreave. The distance between the Wyre boundary at Forton in the North and the boundary in the South at Barton is just over 10 miles and it is inevitable that the majority of families moving to new homes will rely on Garstang. This brings both opportunities and problems of access and capacity which the policy does not fully address.

9 SITE ALLOCATIONS MM/063 to MM/076

0545/M/15/C

MM/047

9.1.2. We seek clarification of the meaning of the deleted last sentence beginning" In view of the fact that due to highway constraints dwelling numbers are maximum....." Did this mean that there could be no more development and if so what has changed?

0545/M/16/C

MM/065

SA1/16. Cockerham road. Though not in the parish of Garstang this and other sites to the North and the south have significant impact on services and the environment that have been overlooked. We are extremely concerned that it is now proposed to allocate 260 homes on this triangular site in a quiet clearly rural backwater of the borough especially as the land immediately to the south fronting the A6 has permission for 269/270 a combined total of in excess of 500 homes and 1,000 families and associated vehicles. Although these sites are partly justified by the comment that they are only half a mile from Garstang centre, ie, walking distance it should not be forgotten that even if speed limits are reduced the volume of traffic on the A6 is such that if you wish to live to a ripe age you do not attempt to cross it. This site fails the test of cohesion with its parent community and its impact on the landscape and its special quiet and highly valued Nateby Crossing Lane.

0545/M/17/C

MM/066

SA 1/17. South of Prospect Farm MM/066. The increase in homes is justified entirely on the basis of having to find additional numbers rather than for reason of an attractive site lay out with room to breathe and move. The site will become indistinguishable from any other.

0545/M/18/C

MM/067

SA 1/18. Kepple Lane has experienced perhaps the greatest change since the present plan was approved in 1999. It is a narrow road with twists and turns and a very busy medical centre half way down on the south side. It does not lend itself to traffic measures and the primary school and the unsighted canal bridge are serious points of conflict between children, pedestrians and vehicles. Additional allocations have no justification and they fail the Vision test.

END.

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.	Yes

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

0616/M/01-02/B1, C

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	7
Response Date	22/10/18 15:40
Status	Submitted
Submission Type	Web
Version	0.1
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	mr
First name (required)	John
Last name (required)	Hallas
Organisation (if relevant)	Claughton on Brock Parish Council
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? Yes

0616/M/01/B1

Main modification reference, MM: 010

0616/M/02/C

Paragraph or policy reference: 5.6.3

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

Not effective

Please provide precise details of why you believe this main modification is not sound:

I have no specific issue with the main body of the modification wording however I consider that more needs to be stated. I acknowledge that the Policy SP5 is to protect from proposed damaging or potentially destructive development proposals and applications, irrespective of whether they are within or outside of the AONB or both. However my concern is to ensure that policies are capable of adjusting and adapting to meet the needs of the local economy as we are living in a volatile and changing world both economically and environmentally. The policies that are included in the local plan and particularly those such as SP5 need to have the capability to enable the Planning and Development Officers the leeway to respond to changes in Central Government Policies. In this specific instance I would highlight Agricultural Policy - as we simply do not know what this will be in a 'Post Brexit Britain'.

Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

I would like to suggest that the revised wording might be as follows (my additions are in italic font):

...Amend Policy SP5, Point 1 to read:

"The landscape and scenic beauty of the Forest of Bowland AONB will be protected from any development which would affect the character, appearance and setting of the AONB. *The processes of planning and development decision making must also seek to both accommodate the requirements and demands of both the local economy and new or modified central government economic, agricultural, ecological or other relevant policies."*

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.	No

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

0645/M/01-012/C

Recd 23/10/18

NETHER WYRESDALE PARISH COUNCIL

0645

Dear Sir/Madam

LOCAL PLAN MODIFICATION PROPOSALS AUGUST 2018 – CONSULTATION

The Parish Council is in receipt of the Publication Draft Wyre Local Plan – Proposed Modifications 2018.

The revised policy intentions haven been considered by the Parish Council. The major proportion of these are supported by the Parish and it is pleased that the Local Plan is proceeding to adoption so as to give more certainty to the local community as regards planning policy and future intentions as regards development options and safeguards.

The comments made are not for the most part relating to the substance or overall intent of the policy modifications and so it is debateable whether the recommendations made relate to overall matters of soundness or not. They do primarily seek to expand on the policy wording so as to give the policies greater clarity and focus.

The comments made relate to Table A: Written Statement. The responses are in the context of those policies that have most relevance to the Parish. It is hoped that the response is comprehensive without the need to fill out the lengthy response forms that were issued.

The Modification number is given below and where appropriate the paragraph reference. Included is a commentary with the wording underlined a suggested change to the proposed Modification wording.

MM/03 0645/M/01/C

4.1.5 Tis modification is generally supported, relating to settlement identity. However, in the last line the Parish Council would like to see a stronger reference/addition to those aspects that contribute to settlement identity expanded. In the last line is should read "protects the overall character of Wyre and in many cases is an important factor in providing the identity, character and landscape setting of individual settlements".

Note : The Parish Council is not suggesting the setting of particular settlements should be a designation, rather it should recognise that there are instances where the open countryside plays and important role in defining character in addition to its own inherent qualities. The importance of setting could be considered in the case of individual settlements studies be carried out in the future. In addition the issue of setting can also be a material consideration in assessing the potential impact of development on heritage assets in which countryside can play and important and integral part of such consideration.

MM/03 0645/M/01/C

4.1.11 This refers to managed dispersal. The suggested wording is..." The Council has not based the strategy solely on the highways evidence albeit that was a major consideration. It has taken account of other evidence including issues of flood risk, the locational sustainability of existing settlements to accommodate development, the need to protect the intrinsic value of countryside landscapes and the character and setting of individual communities". With regards to the latter.....

The expanded policy wording would refer to other important material planning considerations affecting the appropriate locations for development as proposed within the plan.

4.1.25 The Parish Council supports this Modification, but would add.... 'Countryside designation' after "The Green Belt.....". 0645/m/011/C

MM/06 0645/m/02/C

Within the Para. "Add new Point 1 before Point 4 to read"

All development should contribute.....development is located. Where development fails to meet this development criteria, it will be deemed as unsustainable and will be refused.

MM/09 0645/m/03/C

The Parish Council supports the Modification. However, within the Paragraph 'Amend Policy SP4, Point 1' the PC considers the wording to be:

"The open rural character of the countryside will be recognised for its intrinsic character, beauty and landscape role it can play in defining the character and setting of individual rural settlements. Development which.....

MM/010 0645/m/04/C

Policy Modification strongly supported.

MM/16 0645/m/05/C

The Parish Council would suggest changes of the wording as follows.

All development must be designed to enhance and respond to the distinctive character of the area as defined.....having regard to density, siting, layout, form, scale, height, proportion, visual characteristics, orientation, landscaping and use of materials.

MM/017 0645/m/06/C

The Parish Council strongly supports this Modification.

MM/019 0645/m/07/C

The Parish Council supports this Modification.

MM/022 0645/m/08/C

The Parish Council supports the Modification and particularly the 'Liverpool Method' to address the supply shortfall rather than the 'Sedgefield Method' to ensure more realistic delivery and certainty proposed within the development within the strategy and associated policies of the Local Plan.

MM/028 0645/m/09/C

The PARISH Council supports tis Modification.

MM/044 AND MM/046 — 0645/m/011/C

The Parish Council supports the Modifications.

0645/m/010/C

MM/089

0645/m/012/C

The Parish Council supports the proposed 'housing position' and the comment that states "This Local Plan includes sufficient land to meet identifies needs in the first five years post adoption".

The Parish Council hopes that the comments and suggested wording amendments can be reasonably accommodated in amendments to the final Modifications.

Yours Faithfully

For Nether Wyresdale Parish Council

0654/M/01-03/B1,C,D

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	5
Response Date	21/10/18 20:40
Status	Submitted
Submission Type	Web
Version	0.1
Please add your personal ID number (if known)	0654
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mr
First name (required)	James
Last name (required)	Procter
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

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Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? No 0654/M/01/B1

Please provide your comment on legal compliance below. If you consider the main modifications to the Local Plan, and/or the Sustainability Appraisal Addendum 2018, not to be legally compliant, please state clearly your reasons and explain how legal compliance can be achieved. Please refer to specific main modification reference numbers if required.

SA1/13:-

We strongly oppose the modification for the following reasons.

1 We are very concerned about the seemingly u-turn on land adjacent to Dead Dam Bridge as we understand that this was originally removed from consideration due to the location of the North West Ethylene Pipe and possible flooding. Then it would seem that this may be the area for the Village Green and now the proposal is for a "modest allocation of 70 houses". 70 houses is not a modest allocation. The amendment seems to be hinged around the email from Gerard Adderley, Health and Safety Executive. There also seems to be confusion around the safe distance between the boundary of the pipeline and housing. Please see extract from Ben Wallace's letter which states 125m. In Gerard Adderley's email HSE it states that should a planning application be submitted for this site an "advise against" response may be received and it appears to state that this would be overruled which is rather alarming as safety must come first.

When we purchased our property we were informed of an Easement by the Solicitor (see attached) and understood that no permanent structure could be placed on the described land.

-

In the HSE email it does mention that any proposals should be discussed with Essar Oil UK as they may have their own restrictions on developments within a certain proximity of the pipeline. Has this been done?

We were under the impression that space around the pipeline was required for maintenance and repair. The pipeline is now over 50 years old and the chances of repair or even replacement is going to increase as years go by. Who knows as well what fracking may do to the pipe if it is granted at Roseacre Wood as the pipe will never have been tested for such ground movement.

We also understand from Inskip and Sowerby Parish Council that there is also an additional gas pipe on this land.

The Villagers safety is paramount and should come above anything else.

Main modification reference, MM: SA1/13 0654/M/02/C

Do you consider this main modification to be "sound"? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

- Not positively prepared
- Not justified
- Not effective
- Not consistent with national planning policy

Please provide precise details of why you believe this main modification is not sound:

1 Existence of North West Ethylene Pipe - existence of Easement/space required around pipeline for maintenance and repair.
2 Flood Risk

The land adjacent to Dead Dam Bridge was initially removed from the Plan due to existence of North West Ethylene pipe and flood risk.

1 Please see map regarding Easement which covers a large proportion of the land to the South.
2 Flooding is a concern not only around Dead Dam Bridge area but also from Upper River Wyre, Brock. This was a major problem only last Friday whe[redacted] very close to our property – was described as "flooding possible – be prepared". This was after only a few hours of heavy rain during Storm Callum. With the potential of future storms/heavy rain this has got to be considered as this area is very close to the proposed development. In fact more housing could also magnify the problem with more concrete areas and less soakaways. Our garden floods during heavy rain already and the area close to our property has been a problem, the Farmer has in the past dug up the field and worked on the drains. Government flood map shows this area to be very close to Flood zones 2 and 3.

We have encountered problems obtaining Home Insurance and found that most Companies will not cover us as they state we are in a flood risk area. There has only been one company that has granted us flood cover – all others have said they would only cover us minus flood cover. We understand that homeowners at the north side of the land have also had problems obtaining home insurance cover. If we are having problems at the north and south of the proposed development then surely new homeowners will also have the same problems.

With the existence of 2 gas pipes and flood risk area we fail to see how this land can be the most suitable place to build 70 houses in Inskip or Wyre as a whole.

The original proposal on land to the North of Preston Road was a greater distance from flood zones and is on higher ground.

Please specify any further modifications needed to make this Main Modification sound and explain why this is the case. It will be helpful if you are able to put forward your suggested revised wording.

I think the original suggestion was that Inskip had a great opportunity to enhance amenities with a Village Green. Where is this going to be located and what size?

Please don't let this become just a small grassed area squeezed into the middle of a housing estate. If in fact the suggested village green ever becomes a reality at all.

Great local examples of innovative open spaces are Kepple Lane Park which holds many Community events/Pilling Dog Field/Wrea Green. The Village Green could really put Inskip on the map.

Do you wish to make an additional individual representation on "soundness" of the Local Plan? No

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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If you wish to comment on the Sustainability Appraisal Addendum 2018, please make your representation below.

0654/M/03/D

We really don't think there is a demand for more housing in the Village and understand that the recent new houses aren't selling quickly even with huge incentives.

There is no bus service in the evenings and limited at weekends. If this additional housing went ahead there would be another 200 plus cars travelling on the narrow local roads. This along with the possibility of fracking traffic - the roads become an even greater hazard for walkers/cyclists/horse riders. We have also expressed our opposition to fracking directly to Wyre Borough Council in the past.

Existing householders' privacy doesn't seem to be taken into consideration either with new houses being built very close to existing houses with no buffer zones of trees and greenery to help soften the impact on the landscape and avoid houses and gardens being overlooked.

The Village will be changed forever from a local farming community to a commuter village. Wildlife will be affected as their habitat is diminished. We currently have the pleasure of seeing bats/owls/birds of prey/pheasants/hedgehogs to name a few that visit our land.

Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.

No

If you wish to participate at the oral part of the examination, if held, it would be useful if you can explain why you think this is necessary.

Not necessary as all the relevant points have been made in here.

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

Personal Local Plan ID: 0654

Please see below extract from Ben Wallace's letter which states 125m:-

> **The Parish Council proposed that this new development be located to the south and west of the village's only pub, the Derby Arms. This would make the pub more central in the village and improve its viability as a business. However, this proposal was rejected by Wyre Council principally due to the proximity of the North West Ethylene Pipeline which runs nearby. I am told this was despite assurances from the Health and Safety Executive that that unlimited housing could be built beyond a 125m boundary from the pipeline's location.**

Gerard Adderley's email below:-

Sent: 30 May 2018 09:53
To: Harris, Len
Subject: Urgent Local Plan Enquiry - Dead Dam Bridge at Inskip

Hello Len

Your query regarding the North West Ethylene Pipeline and the Dead Dam Bridge site at Inskip has been referred to me; sorry that we were unable to meet the deadline for your meeting.

The information which you have provided from Essar Oil UK (via Bell Ingram Design), identifies that the North West Ethylene Pipeline was constructed using heavy-walled pipe in the vicinity of the village of Inskip.

The extent of the heavy-walled pipe on either side of the plot of land identified as Dead Dam Bridge is such that the HSE consultation zones which apply in the vicinity of that particular site are:
Inner zone = 5 metres
Middle zone = 5 metres
Outer zone = 50 metres

Based on these zones, HSE would not advise against the granting of planning permission for housing and a Village Green on this site as long as:

a) These are located more than 5 metres from the pipeline;
b) The area within 5 metres of the pipeline contains only open space, landscaping, gardens, etc and there are no features or facilities, such as children' play equipment, which could lead to the public gathering in this area
c) The Village Green is not used to stage events which could lead to more than 1,000 people being present at any one time; HSE would advise against the granting of planning permission for an outdoor use by the public development of that size within any of the consultation zones.

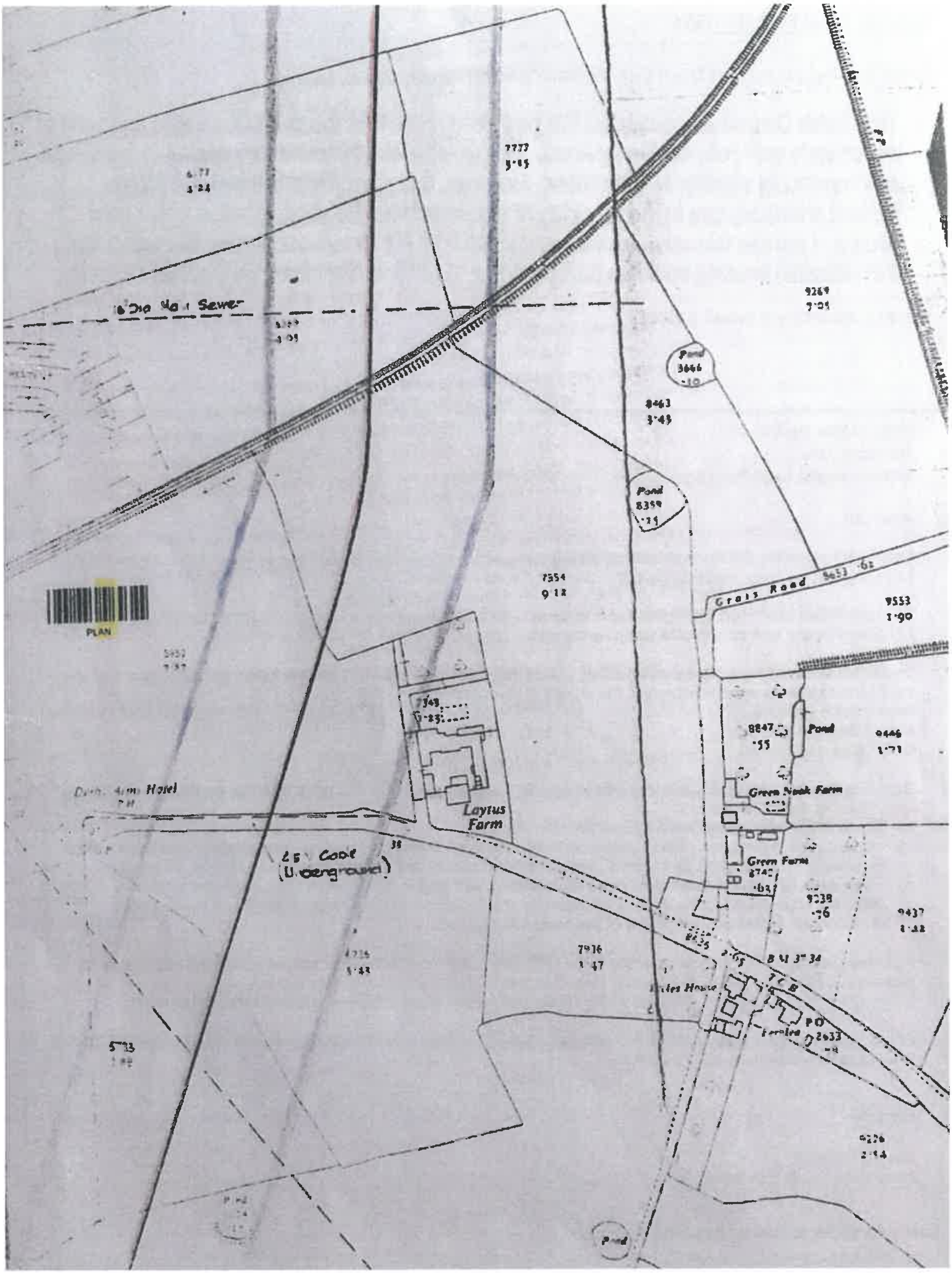
As these reduced zones are not reflected in the HSE Planning Advice Web App, should a planning application be submitted for this site, an 'advise against' response may be received. If so, please contact lupenquiries@hsl.gsi.gov.uk and explain the background regarding the thick-walled section of the pipeline,

Any proposals should also be discussed with Essar Oil UK, as they may have their own restrictions on developments within a certain proximity of the pipeline.

Regards

Gerard Adderley
Health and Safety Executive

Extract below showing Easement area:-



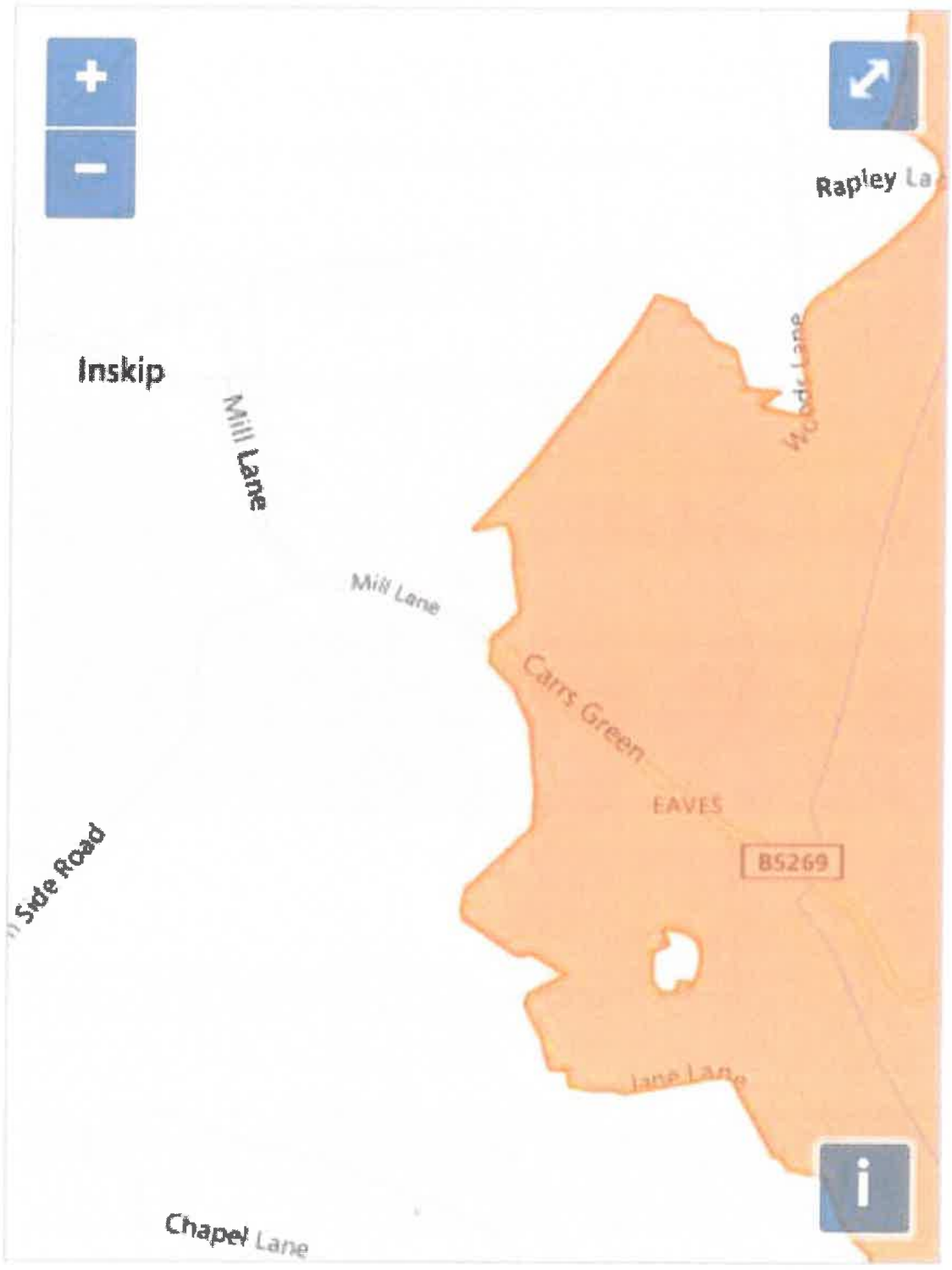
Sewer
PLAN
Pond
Laytus
Farm
Green Nook Farm
Green Farm
Hotel
P O

BT 20:02

flood-wa...ice.gov.uk SHARE

Flooding is possible - be prepared

Upper River Wyre, Brock



What to do before, after and during a

0659/M/01-03/B1, C, D

Inskip with Sowerby Parish Council

inskip-with-sowerby.org.uk

Part A – Personal Details

Personal ID: 0659
Name: Mike Ainsworth, Parish Clerk
Organisation: Inskip-with-Sowerby Parish Council
Address: [redacted]
Postcode: [redacted]
Email: [redacted]
Phone: [redacted]

I am content for my personal details to be recorded on the council's Local Plan consultation database

Date of Representation: 20th October 2018

0659/M/01/B1

Part B – Legal Compliance (Main Modifications and Sustainability Appraisal Addendum 2018 only)
Q1. Do you consider the proposed Main Modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant: Inskip-with-Sowerby Parish Council are unaware of any legal non-compliance in the production of the Publication Draft Wyre Local Plan Main Modifications and Sustainability Appraisal Addendum 2018.

Part C – "Soundness" (Main Modifications Only)
Q2. To which Main Modification does your representation on soundness relate? Please insert the relevant references:

Main Modification Reference:
Paragraph or Policy Reference:
MM/062: Site Allocation SA1/13 – Inskip Extension

0659/M/02/C

Q3a. Do you consider this Main Modification to be "sound": No

Q3b. If you do not consider this Main Modification to be sound, please specify on what grounds:
~~Not positively prepared~~ **/ Not justified /** ~~Not effective~~ **/ Not consistent with national planning policy**

MM/062 proposes allocating an additional 155 dwellings at the settlement of Inskip over the period of the Local Plan. Inskip is a small rural settlement in the heart of the Fylde countryside. Inskip-with-Sowerby Parish Council consider that the proposed scale of development will destroy the essential character of the rural settlement, is not reasonable, and is ***NOT JUSTIFIED***.

The Parish Council agree with the Planning Inspector in his Post-Hearing Advice (Main Modifications), which states at Para. 30 that *"there are a number of adverse impacts that would arise from this allocation – notably effect on the character and appearance of the village and its countryside surroundings"* but also at Para. 31 that: *"a modest scale of allocation would be justified to enhance and maintain the vitality of the village"*.

Inskip with Sowerby Parish Council

inskip-with-sowerby.org.uk

The Parish Council assert that the revised allocation for Inskip is not in accordance with the Inspectors Post Hearing Advice (Main Modifications). As stated in our submission in in 2017 response to the original Publication Draft Wyre Local Plan the settlement of Inskip has consisted of no more than 236 dwellings for many years prior to the recent development of 27 additional dwellings on land south of Preston Road. The proposed growth of the core Inskip settlement by allocating a further 155 dwellings by the completion of the Wyre Local Plan period in 2031 represents a 77% increase and can only be described as a massively disproportionate and unsustainable scale of development.

The lack of local infrastructure makes the level of development proposed at Inskip unsustainable and ***NOT CONSISTENT WITH NATIONAL PLANNING POLICY***.

The "Wyre Local Plan Issues and Options" in June 2015 stated at Para. 6.27 that "the release of site on the edge of all rural settlements would need to be carefully considered to ensure that the expansion of these settlements is not disproportionate and does not have an unacceptable impact on the character of rural areas". The proposed expansion of Inskip fails these criteria. In response to the earlier "Wyre Local Plan Issues and Options" the Inskip-with-Sowerby Parish Council advised that any expansion of the core Inskip settlement be restricted to approximately 50 additional dwellings.

The moderate expansion of the housing stock at Inskip proposed by the Parish Council reflects the infrastructure deficit at Inskip and reflects public opinion. As stated in in our submission in in 2017 response to the original Publication Draft Wyre Local Plan the Inskip Extension proposal is unsustainable owing to concerns with highways and with lack of local infrastructure, services and job opportunities as follows:

Highways: No consideration has been made as to the highways load on the rural lanes generated by the additional dwellings. Specific consideration should be given to the main route out of Inskip towards the north, which is Pinfold Lane, a narrow "moss lane" with deep ditches and sharp right-angled turns totally unsuited to heavy vehicles or to high volumes of traffic. There are regular accidents currently and doubling the size of the village can only make the risk of serious road traffic accidents significantly worse.

There is a ***lack of local infrastructure and services*** at Inskip:

- Nearest Health Centre and Dentist are 4 miles away in Great Eccleston;
- Nearest hospital and ambulance station is at Fulwood some 6 miles distant;
- Extended response times for all emergency services;
- Nearest shops are also at Great Eccleston some 4 miles distant;
- Nearest supermarkets are at Kirkham and Fulwood (some 6 miles distant), or Garstang and Poulton (about 8 miles to each);
- No locally based taxi service;
- Very limited bus service (only every two hours and only during the day on weekdays towards Preston and Great Eccleston, but no bus service direct to Poulton, Garstang, or Kirkham);
- Secondary school students are bussed to either Garstang and Broughton (with some bussed to Kirkham or Poulton);
- There are no transport facilities for 16 to 18 year olds attending college.

And the ***very limited job opportunities***:

- Local job opportunities limited to farming and a few local industrial units offering very modest levels of pay;
- Most working age people have to commute out for work;
- Many commute 20, 40, 60, or more miles to work and back each weekday;
- The nearest train station is 6 miles distant at Kirkham, which is on a branch line some way distant from the West Coast Coat Main Line;
- Nearest access to the motorway network is M6 Junction 32 at Fulwood.

In conclusion, Inskip-with-Sowerby Parish Council agree with the Planning Inspector who states at Para. 30 of his Post Hearing Advice (Main Modifications) that the "*relative remoteness from many services and sources of employment, reliance on the private car for most trips which would involve relatively long journeys along a network of rural B and C roads, encouragement of commuting and implications for climate change. Cumulatively these adverse impacts indicate to me that the scale of allocations would be too large*".

Concern was also raised at the wording of **Key Development Consideration (1)**, which states that "*the development should incorporate a small village green*". Inskip-with-Sowerby Parish Council feel that a proposal for a "small" village green does not match the Parish Council vision for the development of the village, which has been presented to Wyre officials on a number of occasions over the last few years whilst the Local Plan has matured.

In an email dated 7th November 2016 during consultative discussions between Wyre Council and the Parish Council prior to the publication of the Draft Wyre Local Plan the Inskip-with-Sowerby Parish Council articulated a vision of a Village Green that would be a focus for the village community: "*any such green would, like that at Wrea Green, need to be large enough (3-4 acres) to support a cricket field...like Wrea Green, a village pond might form part of the picture and ideally consideration should also be given to a parcel of land fronting the green being reserved for a Village Hall / Sports Pavilion, an amenity our village has never benefited from. The siting of a Village Hall / Pavilion here would complement & dovetail with many community uses that could be housed on the green itself*".

The proposed provision of a "small" village green does not adequately reflect the aspiration for a village green that could support a cricket field and act as a hub for village events and it is recommended that the word "small" is removed from the text.

Key Development Consideration (1) also states that "*the land immediately to the west of the school should only be used for an extension to the primary school*". This infers that land immediately to the north of the school might be used for housing development. At no stage in the consultative discussions with Inskip-with-Sowerby Parish Council prior to the publication of the Draft Wyre Local Plan had housing development on land immediately to the north or the west of the school been proposed and it is recommended that the wording is amended for clarity.

Q3c. Please specify any further modifications needed to make this Main Modification sound and explain why this is the case:

1) The Wyre Local Plan needs to offer a level of development that is sustainable and is commensurate with the extremely modest infrastructure delivered in this remote rural setting – up to 55 additional dwellings maximum rather than the current proposed 155 additional dwellings;

2) Key Development Consideration (1) to be amended to read: "*The development should incorporate a* ~~***small***~~ *village green. The land immediately to the* ***north and*** *west of the school should only be used for an extension to the primary school*" in order to allow the Main Modification to accurately reflect the vision proposed for Inskip.

0659/m/03/D

Part D – Sustainability Appraisal
Q4. If you wish to comment on the Sustainability Appraisal Addendum 2018, please make your representation below:
No comments raised.

Part E – Next Steps
Q5a. Do you wish to participate at the oral part of the examination: Yes

Q5b. If you wish to participate at the oral part of the examination it would be useful if you can explain why you think this is necessary.

Inskip-with-Sowerby Parish Council object to the proposed Inskip Extension on the basis that there is no local demand for the level of development prescribed in the Main Modification 2018, that the proposed level of development is disproportionate and is not sustainable. Inskip-with-Sowerby Parish Council feel duty bound to represent local opinion through the public examination process.

0671|M|01-02|B1, D

Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	11
Response Date	23/10/18 14:03
Status	Submitted
Submission Type	Web
Version	0.1
Please add your personal ID number (if known)	
	0671
Are you responding as an agent?	No

PERSONAL DETAILS

Please provide your personal details (or your client's details if you are an agent).

Title	Mr
First name (required)	Glyn
Last name (required)	Stead
Organisation (if relevant)	Little Eccleston with Larbreck Parish Council
Address (required)	[redacted]
Postcode (required)	[redacted]
E-mail address	[redacted]
Telephone Number	[redacted]

Please indicate below whether or not you wish your personal details to be recorded for the purposes of progressing local planning in Wyre. Unless you indicate otherwise below, your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan and other local planning documents that may be produced. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at planning.policy@wyre.gov.uk or 01253 887231.

Yes - I WOULD like my personal details to be recorded on the council's local plan consultation database

0671/m/01/B1

Do you consider the proposed main modifications to the Local Plan, including the Sustainability Appraisal Addendum 2018, to be legally compliant? Yes

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

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If you do not consider this main modification to be sound, please specify on what grounds (see guidance note for additional information):(please tick one or more boxes as appropriate)

If you wish to comment on the Sustainability Appraisal Addendum 2018, please make your representation below.

0671/M/02/D

With specific regard to the 'Sustainability Appraisal Addendum 2018' (Page 77) 'Little Eccleston with Larbreck Parish Council' believes that items 2. Education; 3. Health; 4. Housing; 5. Access; and 6. Economy; which are currently represented as being GREEN should all in fact be reflected as being RED, for the following reasons:

2. Education - The primary school referred to, does not have the capacity to accept children from another 568 new homes which are intended to be built.

3. Health - The GP surgery referred to is already at 'capacity', servicing the needs of Great Eccleston, Little Eccleston, Elswick and Inskip, with waiting times of up to a month, to be seen by a doctor.

4. Housing - The provision of another 568 new homes will only be detrimental in respect of the limited school provision, inadequate GP surgery provision and will provide an additional burden to the road network and to essential services (gas, water, electricity, telephony).

5. Access - There is not a railway station / rail link and bus service provision has already been greatly reduced, due to Lancashire County Council withdrawing subsidies to the majority of rural areas in the county. Private operators do not consider this rural area to be a cost-effective bus route.

6. Economy - there are not employment opportunities in the area which will sustain adult owners of another 568 new homes and, inevitably, this will result in even more adults travelling out of the area to work, causing further road congestion, greater damage to the road networks and to the environment.

Glyn Stead

Vice-Chairman

Little Eccleston with Larbreck Parish Council

Do you wish to participate at the oral part of the examination if the Inspector considers that further hearings are necessary? Please note that the process for undertaking the examination, including subjects/ matters to be addressed and participants, will be decided by the Inspector.

No

If you would like a copy of your representation please select YES. A copy will be sent to your email address provided in section A (or postal address if no email address is provided).

Yes

Rec'd 24/10/18

0676/M/01-07/C,GC

Our ref: NO/2012/103607/CS-04/EW1-L01
Your ref: EL7

Date: 24 October 2018

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

Dear Sir/Madam

WYRE PUBLICATION DRAFT LOCAL PLAN – PROPOSED MAIN MODIFICATIONS CONSULTATION

Thank you for referring the above to us for consultation.

We have reviewed information available and insofar as it relates to our remit we have the following comments:-

Site allocations

We note the amendments to the proposed site allocations and we have no concerns.

The Level 2 SFRA: Flood Risk Sequential Test Paper (document reference EL8.007) considers the risk of flooding to amended allocations SA1/11 Norcross and SA1/13 Inskip Extension, and we are satisfied with its content. - 0676/M/01/GC

General comments

We also note that amendments have been made to Key Development Considerations for the several site allocations:

- There are references to surface water being drained into named watercourses, which are designated Main Rivers. Where outfalls are proposed directly into Main Rivers the developer will require an Environmental Permit for Flood Risk Activities.
- Where open space buffers are to be provided alongside watercourses, the text could be more robust by referring to green and blue infrastructure and how the provision and enhancement of such assets can provide multifunctional benefits.

0676/M/02/GC

0676/M/03/GC

0676/M/044/C

Document Ref	EL7.001a
Document Page Number	Page 38
Mod Ref	MM/050
Publication Page number	Page 82
Part of Plan	Site Allocations (SA1/1 West of Broadway, Fleetwood)
Modified text (deleted text shown as strikethrough, additional text shown underlined).	*Amend Key Development Consideration 1 to read:* *".....lifetime of the development. ~~An FRA must be carried out and t~~ The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the ~~undefended~~ design flood **of <0.5% change of flooding** level plus an allowance for climate change for the life of the development. Where finished floor levels cannot be set above **~~the 1 in 200 year plus climate change flood this~~** level, the developer....."*
EA Comment 1	**~~of <0.5% change of flooding~~** There is a typing error in this text ('change' should be 'chance'), however we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the ~~undefended~~ appropriate 'design flood' ~~of <0.5% change of flooding~~ level plus an allowance for climate change for the life of the development.
EA Comment 2	**~~the 1 in 200 year plus climate change flood this~~** ~~'this'~~ has been shown as strikethough in error. This sentence should read: Where finished floor levels cannot be set above ~~the 1 in 200 year plus climate change flood~~ this level, the developer....."

0676/M/052/C

Document Ref	EL7.001a
Document Page Number	Page 54
Mod Ref	MM/080
Publication Page number	Page 140 - 141
Part of Plan	Site Allocations (SA3/1 Fleetwood Dock and Marina)
Modified text (deleted text shown as strikethrough, additional text shown underlined).	*Amend Key Development Consideration 4 to read:* *".....lifetime of the development. ~~An FRA must be carried out and t~~ The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the ~~undefended~~ design flood **of <0.5% change of flooding** level plus an allowance for climate change for the life of the development. Where finished floor levels cannot be set above **~~the 1 in 200 year plus climate change flood~~ this** level, the developer....."*

EA Comment	~~**of <0.5% change of flooding**~~ There is a typing error in this text ('change' should be 'chance'), however we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the ~~undefended~~ appropriate 'design flood' ~~of <0.5% change of flooding~~ level plus an allowance for climate change for the life of the development.

/0676/M/06/C

Document Ref	EL7.001a
Document Page Number	Page 57
Mod Ref	MM/085
Publication Page number	Page 151
Part of Plan	Site Allocations (SA4 – Hillhouse Technology Enterprise Zone, Thornton)
Modified text (deleted text shown as strikethrough, additional text shown underlined).	*Amend Key Development Consideration 1 to read:* *"Finished floor levels must be above the ~~undefended~~ design flood **~~of <0.5% change of flooding~~** level plus an allowance for climate change for the life of the development. Where finished floor levels cannot be set above **~~the 1 in 200 year plus climate change flood~~** **this** level, the developer……."*
EA Comment	~~**of <0.5% change of flooding**~~ There is a typing error in this text ('change' should be 'chance'), however we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the ~~undefended~~ appropriate 'design flood' ~~of <0.5% change of flooding~~ level plus an allowance for climate change for the life of the development.

/0676/M/07/C

Document Ref	EL7.001a
Document Page Number	Page 58
Mod Ref	MM/086
Publication Page number	Page 153
Part of Plan	Site Allocations (SA5 - Port of Fleetwood, Fleetwood)
Modified text (deleted text shown as strikethrough, additional text shown underlined).	*Amend Key Development Consideration 4 to read:* *"…..lifetime of the development. ~~An FRA must be carried out and t~~ The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the ~~undefended~~ design flood **~~of <0.5% change of flooding~~** level plus an allowance for climate change for the life of the development. Where finished floor levels cannot be set above **~~the 1 in 200 year plus climate change flood~~** **this** level, the developer……."*

	New Key Development Consideration to read: *"2. Copse Brook is a designated Main River. The prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the watercourse and 16 metres from the quay wall…"*
EA Comment 1	~~**of <0.5% change of flooding**~~ There is a typing error in this text ('change' should be 'chance'), however we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the ~~undefended~~ appropriate 'design flood' ~~of <0.5% change of flooding~~ level plus an allowance for climate change for the life of the development.
EA Comment 2	**New Key Development Consideration** We wish to clarify that Copse Brook is a culverted non-tidal Main River and that the 16 metre easement is in relation to the top of the bank/quay wall of the River Wyre and landward toe of any Environment Agency tidal flood defences. As such, we would suggest the new text should be revised as follows: The River Wyre and Copse Brook are designated Main Rivers and subject to the requirements of the Environmental Permitting (England and Wales) Regulations 2016. An Environmental Permit from the Environment Agency is therefore required for any proposed works or structures in, under, over or within 8 metres of the edge of the Copse Brook culvert, and 16 metres of the top of the bank/quay wall, or landward toe of the Environment Agency flood defences, of the tidal River Wyre…

We trust the above is of assistance to you. If you have any comments or queries relating to any of these comments, please do not hesitate to contact us.

Yours faithfully

Mr Alex Hazel
Planning Advisor - Sustainable Places Team

Tel: [redacted]
E-mail: CLPlanning@environment-agency.gov.uk

End

0684/M/01/GC

0684

Riley, Fiona

From: Policy, Planning
Subject: Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

From: Tim Bettany-Simmons [mailto:[redacted]
Sent: 09 October 2018 11:32
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: RE: Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Dear Mr Thow,

Thank you for your consultation on the Proposed Main Modifications. The Canal & River Trust (the Trust) have reviewed these modifications and have no comments to make on them.

It is unfortunate that the Trust would appear to have missed the previous consultations stages on the Local Plan and as such have missed the opportunity to ensure that the Lancaster canal is catered for within the Plan. This said as I have received this email, hopefully all future policy consultations will be received.

Kind regards

Tim Bettany-Simmons BA (HONS), MSc, MRTPI
Area Planner / Cynlluniwr Ardal

M
E
W www.canalrivertrust.org.uk

Canal & River Trust / Glandwr Cymru,
Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP

From: Policy, Planning <Planning.Policy@wyre.gov.uk>
Sent: 11 September 2018 11:19
To: Tim Bettany-Simmons [redacted]
Subject: Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Dear Sir/Madam

Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Personal Local Plan ID: 0684

In September 2017 the council undertook a six week public consultation on the Publication Draft Wyre Local Plan. In response, the council received representations from 763 individuals and organisations.

The council submitted the Plan to the government on 23 January 2018 which was the start of the Local Plan Examination. Public hearings held from 15 May 2018 to 5 June 2018. In response to issues raised within the representation and by the Examination Inspector, and taking into account the Inspector's Post Hearings Advice, published in July 2018, Main Modifications to the Local Plan are now proposed.

The council is now inviting representations on the Main Modifications to the Publication Draft Wyre Local Plan and the accompanying Sustainability Appraisal Addendum 2018 over a six week period from **12 September 2018 to 5.00pm 24 October 2018.**