

For Office Use Only:

Date Received

23/10/18

Rep. No.

0995/M/01-06/B

Inskip Residents Action Group

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

0995/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.

MM 062, MM102, MM003, MM005, MM049

Site INS-07 directly east of the Derby Arms public house in Inskip was rejected from further consideration as a development site early in the plan making process due significantly to the presence of the North West Ethylene Pipeline which crosses the site, and its (then) associated restrictive Consultation Zone widths. Inskip Parish Council published its 'Vision' for the village with plans for the site in autumn 2014 which was rejected shortly thereafter. No further engagement or consultation with either the Parish Council or the Local Community took place until late summer of 2018 when Wyre Borough Council on prior confirmation that the consultation zone widths had been reduced, announced its intention to allocate the site with 70 dwellings for housing development.

Consequently, concerning the site in the intervening period, no regard has been paid to National Policy and advice contained in guidance issued by the Secretary of State, particularly (but not exclusively) concerning "early and meaningful engagement of neighbourhoods" (NPPF Para.155), as is required by the Planning and Compulsory Purchase Act 2004, Provision 19.2a) The above Main Modifications are Legally Non-Compliant in this regard.

Allocation of Site INS-07 and its 70 dwellings is legally non-compliant and premature. It should be withdrawn from the local plan.

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/062
Paragraph or Policy Reference	Site Allocations (SA1/13 – Inskip Extension) Pages 104 and 105 of SD001 Publication Draft

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

Yes No

0995/M/02/C

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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 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

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

The revised allocation for Inskip (155 Dwellings) is not in accordance with the Inspector's Main Modification at para. 31 of his Advice to Wyre Borough Council (WBC). Within para. 31 he calls for 'a modest scale of allocation confined to the area which already has planning permission and the land allocated either side of the school (MM)'.

The proposed allocation of 155 properties, represents a **two-thirds increase** in the core settlement of the village. The real scale of development in the village in the life of this plan should take account of the 27 properties under construction at Ash Meadows, bringing the total to 182 (see Appendix E Table - Housing and Employment Growth in amended Local Plan EL8.002), a massive **77% increase** in the core settlement housing stock. These figures are **not 'modest'** under any reasonable assessment and will leave the Inspector's concerns summarised in his Advice, intact. The allocation therefore does not accord with the Inspector's Advice.

In para.31 of his Advice the Inspector goes on to invite the Council to **consider** whether a modest allocation on site INS 07, east of the Derby Arms Public House would be justified. No figures or numbers of houses are referred to and this site is clearly not a recommended Main Modification from the Planning Inspector.

Continued on Part F Continuation Form (MM/062)

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.

Amend Site Area to equal area of existing sites with planning permission.

Reason: Site INS – 07 proposed deleted under Q3b above.

Amend Site Capacity to equal capacity of existing sites with planning permission.

Reason: Site INS – 07 proposed deleted under Q3b above.

Amend Site Description to read: "The allocation consists of three parcels - - - - -"

Reason: Fourth parcel INS – 07 proposed deleted under Q3b above.

Amend Key Development Consideration (KDC) 1 to read: "The three parcels should be - - - -"

Reason: Fourth parcel INS – 07 proposed deleted under Q3b above.

Delete KDC 9a (see EL7.001a p48)

Reason: No longer relevant. Applies to northern parcel of land, deleted under MM/102

Delete KDC 9d (see EL7.001a p48)

Reason: Fourth parcel INS – 07 proposed deleted under Q3b above.

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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.

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.

Participation in further parts of the Examination is to be undertaken by members of Inskip with Sowerby Parish Council.

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.

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PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

Please use this part of the form if you wish to make additional representations on the “soundness” of the Publication Draft Wyre Local Plan Main Modifications 2018.

Please add your personal ID number (if known)

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

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/049

Paragraph or Policy Reference Site Allocations 9.2
Table after 9.2.3
Residential Developments

0995/1/003/c

Q3a Do you consider this Main Modification to be “sound”?
Yes No

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

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Rep. No.

Please fill out Part F if you need additional space

Q3b 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:

It is impacted by proposed changes to MM/062. Please see case at Q3b of MM/062.

Please fill out Part F if you need additional space

For Office Use Only: Date Received

Rep. No.

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.

Amend Table – SA1 Residential Development after 9.2.3 to read:

SA1/13	Inskip Extension, Inskip	55	55
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Please fill out Part F if you need additional space.

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PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

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Please add your personal ID number (if known)

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

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/003
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Paragraph or Policy Reference	Appendix E to EL8.002
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0995/m/004/c

Q3a Do you consider this Main Modification to be “sound”?

Yes 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

For Office Use Only: Date Received

Rep. No.

Q3b 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:

It is impacted by proposed changes to MM/062. Please see case at Q3b of MM/062.

Please fill out Part F if you need additional space

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Rep. No.

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.

Change Table at Appendix E, entry for Inskip to read:

Inskip	20	0	62	0	82	1.0	0	0
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Please fill out Part F if you need additional space.

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PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

Please use this part of the form if you wish to make additional representations on the “soundness” of the Publication Draft Wyre Local Plan Main Modifications 2018.

Please add your personal ID number (if known)

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

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/102
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Paragraph or Policy Reference	SA1/13 – Inskip Extension
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Q3a Do you consider this Main Modification to be “sound”?

Yes No

0995/n/os/c

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

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Q3b 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:

It is impacted by proposed changes to MM/062. Please see case at Q3b of MM/062.

Please fill out Part F if you need additional space

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Rep. No.

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.

Amend Settlement Boundary (SP1), Countryside Area (SP4) and Residential Development (SA1) to correlate with deletion of site INS-07 (in the south east of the village) from the local plan.

Please fill out Part F if you need additional space.

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PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

Please use this part of the form if you wish to make **additional** representations on the “soundness” of the Publication Draft Wyre Local Plan Main Modifications 2018.

Please add your personal ID number (if known)

0995

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

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/005
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Paragraph or Policy Reference	Strategic Policies SP1 Development Strategy Table at Policy SP1 Point 2
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Q3a Do you consider this Main Modification to be “sound”?

Yes No

0995/1/26/c

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

For Office Use Only:	Date Received	<input type="text"/>	Rep. No.	<input type="text"/>
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Q3b 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:

It is impacted by proposed changes to MM/062. Please see case at Q3b of MM/062.

Please fill out Part F if you need additional space

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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.

Amend table at SP1 Point 2, Fourth Row, Main Rural Settlements to correlate with deletion of site INS – 07 in the south east of Inskip village.

Please fill out Part F if you need additional space.

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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)

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

Which question are you adding additional information to?	Part C Q3b
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/062 Site Allocations (SA1/13 – Inskip Extension) Pages 104 and 105 SD001 Publication Draft

Continued from MM/0062 Representation Form Parts C Q3b

WBC have responded to this invitation by adding an allocation of 70 dwellings to the new site INS-07 and incorporating this into the Inspector’s MM above, when it is not their prerogative to do so. The Borough Council have taken the Inspectors’ suggestion and interpreted it in a totally unacceptable and misleading way which may also be illegal.

Two key issues now arise from this action:

1. The allocation of 70 dwellings to Site INS-07, a 30% increase in the core settlement housing stock is **not ‘modest’** as required. It appears to be application of the maximum allocation the site can tolerate with no justification as to its appropriateness for the village going forward.
2. The allocation of housing on Site INS-07 has been introduced apparently in haste without full consideration of the circumstances and history of this site. Council records will show that the site was highlighted as a key community resource by the PC in its ‘Vision’ for the village, communicated to the Head of Planning Services in November 2014, some four years ago at an early stage in Local Plan preparation.



PC Vision Letter to
WBC 171114.docx

Attached at the end (DP)

Around that time INS-07 was rejected as a development site due in part to the proximity of the North West Ethylene Pipeline. No consultation concerning the site has taken place with either the PC or the Local Community since 2014. Once again, the village is faced with a site proposal and an allocation imposed ‘out of the blue’ without warning and very late in the planning process. Small wonder that the southern part of the village is up-in-arms and angry. Why has nothing been learned by the Council about ‘Engagement’ from

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the recent debacle over the deleted northern site (MM/102)?

With the site's prime location at a natural focal point in the village and the NWEF Consultation Zones now reduced in width, it is premature to assign INS-07 directly to housing development. A major change such as this was not the subject of public examination. What is required is firstly some meaningful engagement with the PC and the Community with reconsideration of the other potential uses for the site as outlined in the PC's Vision for the village (2014), and heeding of the growing view that a Village Green should be sited in close proximity to this focal point and to the Derby Arms public house.

To proceed without full inclusion of the PC and the Community would be to contravene the 2012 NPPF at paragraph 155 and to trample an opportunity to enhance the character of Inskip village.

Site INS-07 and its allocation of 70 dwellings should be deleted from the plan and full consultation with the PC and the Community conducted as to the 'best value' use of the site for the future of the village. The PC's Vision for the village should be re-visited so as to inform this process.

Inskip Residents Action Group

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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)

0995

Personal Details		Agent Details (if applicable)	
First Name	Paul	First Name	
Last Name	Desborough	Last Name	
Organisation (if relevant)	Inskip Residents Action Group (IRAG)	Organisation	

Which question are you adding additional information to?	Part A Personal Details
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.	

Additional Information:

I am Paul Desborough, Coordinator of the Inskip Residents Action Group (IRAG), set up to give collective voice to issues and concerns which threaten our village, its rural way of life and character so that the collective element might carry more influence than the sum of the individual parts.

I am making the attached Representation concerning Main Modifications to the Draft Local Plan for Wyre on the Group's behalf.

The Group currently has a membership of 71 villagers.

Signed: *P H Desborough*

PH Desborough

Date: 16th October 2018

For Office Use Only: Date Received

Rep. No.

INSKIP-WITH-SOWERBY PARISH COUNCIL

17 November 2014.

David Thow
Head of Planning Services
Wyre Borough Council
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

Dear Mr Thow,

Emerging Local Plan - Inskip

May I firstly offer our heartfelt thanks for meeting with members of the Parish Council (PC) and listening to our views. Since then we have held our own 'in house' discussions and have met with a landowner before finalising the proposals as follows:

As part of a community steeped in agriculture the PC feel duty bound to protect the best of the agricultural land that forms part of our village. With that fundamental principal in mind we totally reject all those sites (except for one small area) currently put forward by Metacre as shown on your plans 'Call for Site Submission' and 'Potential Sites'.

Given the foregoing the PC suggest that there is far more merit, and potential gain to the village, in confining any future development to that land of a lesser agricultural quality in the proximity of the Derby Arms.

We are in agreement with the comment made by Mr Payne that our village lacks quality and see this as an opportunity to address that. Following lengthy discussion and debate the PC has a vision for the future of our community that we ask that you give careful consideration to.

As a principle part of our 'vision' we would like to see the Derby Arms become part of a focal point that would give Inskip an identity in keeping with its rural status. In order to achieve that we would like to see the creation of a village green, ideally of a size sufficient to play cricket on similar to that at Wrea Green. We would suggest this should be located on field no 5852 that we understand is in Metacre's ownership. This site (for a village green) is crucial to our vision.

Housing could then be sited around the 'green' both as frontage development and in short cul-de-sacs and we would ask that a suitable mix of cottage and larger executive

style homes would be most appropriate given the status we are seeking to give the green. We would also ask that consideration be given to a parcel of land fronting the green being reserved for a Village Hall, an amenity our village has never benefited from. The siting of a Village Hall here would compliment/dove-tail with many community uses that could be housed on the green itself.

Such a development would 'fill the gap' between Dead Dam Bridge and Laytus Hall Farm to the east/north-east of the B5269 so now we turn our attention to the opposite side of Preston Road.

All the land abutting the Derby Arms forms part of Higham Side Farm and following discussions with the owner, Mr D. Cooper, it would be made available for development. The PC are looking at field No. 4551 immediately north of the car park with frontage to Preston Road and part of field No. 3345 to the west thereof with frontage to Higham Side Road (for clarification these are now one field, the original field boundary being removed). The PC are not advocating that the whole of field No. 3345 (shown to be 8.94 acres) be developed but perhaps half of it.

We would then suggest that the aforesaid development be linked to the existing development by frontage development between Dead Dam Bridge and 'Homestead', Mill Lane. That being part of field No. 3460 owned by and put forward by Metacre. For the avoidance of doubt we should point out that Preston Road becomes Mill Lane between Dead Dam Bridge and School Lane before reverting to Preston Road again.

That then leaves the land to the south of Higham Side Road and Preston Road and the PC would be willing to consider some partial frontage development. We understand these fields are rented, we assume from Metacre, but a Land Registry search would confirm.

The PC would also ask that ANY development include 'Starter Homes' available to rent and buy (outright and possibly shared) together with an element of single storey dwellings (bungalows) for sale and rent to help meet the requirements of those elderly residents who wish to downsize without leaving the village.

In putting forward these proposals the PC have also taken into account other considerations:

- 1) When the PC conducted a survey earlier this year in response to the Planning Application for forty houses on Preston Road a number of residents responded identifying this part of the village as being best suited for future development.
- 2) Such a scheme (as proposed) would help safeguard the future of the village pub (Derby Arms) that has been at risk in recent years by bringing it 'into' the village rather than leaving it isolated 'outside' as it is now.
- 3) It may possibly help the creation of a retail outlet in this vicinity that would not only serve the village but those employed in the Nightjar Way Industrial Area.
- 4) Such development would be within walking distance of Nightjar Way that not only provides jobs but also has a Children's Nursery sited there.
- 5) Would be in closest proximity to the sewage works whereby any sewer upgrades would not be disruptive to the existing part of the village.

- 6) Could lead to the properties on Carrs Green being connected to the main sewer alleviating years of drainage issues that remain unresolved despite best efforts of the PC and WBC.
- 7) This proposal by the PC would have the least impact on the existing residents.

To conclude we hope you will 'buy-in' to our 'vision' and that we can work together to our mutual benefit and any opportunity to continue this dialogue would be most appreciated.

Yours sincerely

Phil James
Chairman
Inskip-with-Sowerby Parish Council

[Redacted signature block]

1015

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

22nd October, 2018

Dear Sir/Madam

Objection to the Draft Local Plan Main Modifications - Inskip.

Part A - Personal Details

Personal ID:

Name: Philip A. James

Organisation: not relevant

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

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:
As far as I am aware.

1015/M/
01/101

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

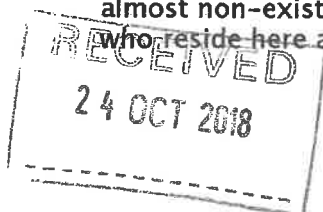
1015/M/02/C

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:

The proposed addition of 155 dwellings (MM/062) does not conform with the Inspector's advice that only a 'modest' increase of homes be provided in Inskip. Wyre Borough Council have already permitted the construction of 55 of those dwellings, in addition to the previously approved 27 dwellings, so to add a further 100 is totally unacceptable. Enough is enough!

To increase the size of Inskip any further is unsustainable. The village has no facilities bar a primary school, a public house, two churches and a youth club. The village has no medical facilities, no shops, a very limited bus service that I'm sure has been detailed by others and a poor road network, no A roads, just one B road and a series of 'country lanes'. The lack of local employment opportunities and almost non-existent public transport facilities means most of those of working age who reside here are forced to travel to other centres by private car.



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

- 1) As stated above, Wyre Borough Council have already committed 55 dwellings to Inskip and enough is enough!
- 2) A more robust protection, for educational purposes only (not housing development), should be made to the land immediately abutting St Peter's School. I make particular reference to that land immediately to the west and north of the school grounds though there would be merit in also excluding that to the east. The school is a vital part of village life, the protection of which in both the short and long terms should not be underrated or undermined.

Part D – Sustainability Appraisal

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

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.

The proposed level of development is disproportionate and is not sustainable at this present time. Wyre Borough Council's current proposed modifications, in respect of Inskip, lack vision and seem designed to pacify a major land owner while helping meet the housing numbers imposed on the council by central government. Inskip has already been subjected to two ill-thought housing developments increasing the local housing stock by 82 units. I urge a halt be made to any further development now before any more unwanted and unwarranted damage is done to our environment.

Yours faithfully,

A large, dense, and somewhat illegible handwritten signature in black ink, appearing to be written with a ballpoint pen. The signature is written over the name Philip A. James.

Philip A. James



1055/M/01-02/GC
D

By email to: planning.policy@wyre.gov.uk

Our ref:
PL00179209

Your ref:

18 Sept 18

Dear Mr Thow,

1055/M/01/GC

Publication Draft Wyre Local Plan – Proposed Main Modifications 2018

Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

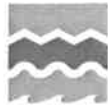
If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[Redacted signature]

Emily Hrycan
Historic Environment Planning Adviser (North West)
Historic England
Telephone: [Redacted]
e-mail: [Redacted]





Historic England

By email to: planning.policy@wyre.gov.uk

Our ref:
PL00179263

Your ref:

18 Sept 18

Dear Mr Thow,

1055/M/02/D

Wyre Local Plan - Sustainability Appraisal Addendum 2018

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

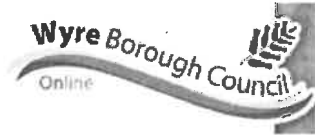
Yours sincerely,

Emily Hrycan
Historic Environment Planning Adviser (North West)
Historic England
Telephone:
e-mail:



Historic England, Suite 3.3, Canada House, 3 Chepstow Street, Manchester M1 5FW
Telephone 0161 242 1416 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





Comment

Event Name	Publication Draft Wyre Local Plan Main Modifications 2018
Comment ID	13
Response Date	23/10/18 17:10
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	Ms
First name (required)	Barbara
Last name (required)	Sumner
Address (required)	[REDACTED]
Postcode (required)	[REDACTED]
E-mail address	[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
--	-----

1058/m/01/BL

1058/m/02/c

Main modification reference, MM: MM/065

Paragraph or policy reference: SA1/16

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

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

Although I support the building of a new school on the proposed site I do have concerns regarding its access and surrounding traffic issues. After looking at the plan it seems to me that traffic approaching the school from both Garstang and the A6 will look to use the Cockerham/ Croston road traffic light junction as a primary route. I believe this will create a potentially hazardous traffic situation as this junction is already very busy and will only get worse with the introduction of the school and surrounding housing development, especially at peak times when residents will be going to and from the school and the housing development.

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 see the solution to this traffic problem in the adjacent development 'Land West of A6 16/00241/ OULMAJ'. By using the proposed roundabout on this development as an access route to the new school, the majority of traffic which will be approaching the school from the south will be able to use this roundabout to quickly and safely enter and access the school and the housing development; and by doing so avoid the Cockerham/ Croston Road traffic light junction, preventing further congestion on an already busy junction. I actually think traffic approaching the school and development from the North via the A6 would be better suited to go straight on through the traffic lights and then enter the school via the roundabout. This would prevent further congestion turning right at the Cockerham/ Croston Road traffic light junction.

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)

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.

It is encouraging to see that a new school has been proposed on this location and I fully support this. As long as this new school has easy and safe access, which I think the proposed roundabout on Land West of A6 16/00241/ OULMAJ would ensure.

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).

No

J. Keadman 1059/M/01-02/B1,C

For Office Use Only: Date Received	<input type="text"/>	Rep. No.	1059/M/01-02/B1,C
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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 1059/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.

THE ONLY OBJECTION HERE BEING THE NUMBER OF PROPOSED HOUSES WOULD BE UNSUSTAINABLE

Please fill out Part F if you need additional space

PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY)

1059/M/02/C

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/
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Paragraph or Policy Reference	
-------------------------------	--

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

Yes No

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Rep. No.

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

THE ONLY QUESTIONABLE POINT IS ON THE FLOODING ASPECT.

PROPOSED BUILDING LAND IS VITAL TO DRAINAGE, AS IT IS NEEDED FOR THIS PURPOSE. OTHERWISE, THERE COULD BE DIRE CONSEQUENCES.

Please fill out Part F if you need additional space

Q3b 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

For Office Use Only: Date Received

Rep. No.

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.

- 1) ROAD CONGESTION AND DANGER.
- 2) G.P. AND DENTAL PRACTICES IN THIS AREA, THEIR PATIENT LISTS ARE AT MAXIMUM CAPACITY.
- 3) BLACKPOOL ROAD IS THE MAIN ROUTE FOR EMERGENCY VEHICLES, ESPECIALLY BLUE-LIGHT AMBULANCES.

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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.

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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 BE LISTENED TO WOULD BE ADVENTUROUS.
LETTERS CAN BE IGNORED, AS CAN EMAILS.

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 C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

Please use this part of the form if you wish to make additional representations on the “soundness” of the Publication Draft Wyre Local Plan Main Modifications 2018.

Please add your personal ID number (if known)

Personal Details		Agent Details (if applicable)	
First Name		First Name	
Last Name		Last Name	
Organisation (if relevant)		Organisation	

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/
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Paragraph or Policy Reference	
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Q3a Do you consider this Main Modification to be “sound”?

Yes 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

For Office Use Only: Date Received	<u>24/10/18</u>	Rep. No.	<u>1060/M/01-10/21</u>
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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

1060/M/01/181

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	<u>MM/ 003-5, 021-23 and 048</u>
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Paragraph or Policy Reference	References to the OAHN figure, Housing Supply figure and % of supply delivering on the OAHN figure.
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1060/M/02-09/C

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

Yes No

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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 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

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Rep. No.

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

Firstly, there should be a correction of the housing figures expressed principally through MM/003-005, MM/021-23 and MM/048. There is an incorrect housing demand (Objectively Assessed Housing Need [OAHN]) figure, an incorrect supply figure and an incorrect calculation regarding how the Local Plan now meets 97% of the OAHN.

Please refer to our accompanying representations for further information regarding these figures.

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.

In summary we make the following recommendations:

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

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

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

Please refer to our accompanying representations for further information regarding these figures.

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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.

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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 discuss the Housing Land Supply, OAHN and how the Local Plan is delivering on meeting its OAHN.

We would also wish to discuss how the land at Calder House Lane can assist in meeting the OAHN as an appropriate allocation.

Please refer to the enclosed representations for additional information.

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:

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Post to Planning Policy Team, Wyre Council, Breck Road, Poulton-le-Fylde, FY6 7PU.

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

For Office Use Only:	Date Received	<input style="width: 90%;" type="text"/>	Rep. No.	<input style="width: 90%;" type="text"/>
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PART C – SOUNDNESS (MAIN MODIFICATIONS ONLY) – CONTINUATION FORM

Please use this part of the form if you wish to make additional representations on the “soundness” of the Publication Draft Wyre Local Plan Main Modifications 2018.

Please add your personal ID number (if known)

Personal Details		Agent Details (if applicable)	
First Name		First Name	Rob
Last Name		Last Name	Moore
Organisation (if relevant)		Organisation	Savills (UK) Ltd

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/ 089 and 090
------------------------------------	-----------------

106/A/09-019C

Paragraph or Policy Reference	LPR 1
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Q3a Do you consider this Main Modification to be “sound”?

Yes No

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

For the avoidance of doubt we support the inclusion of Local Plan Review Policy 1. We are promoting the land at Calder House Lane as an alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.

As explored through the earlier sections of this documents it offers an easily identifiable, deliverable and sustainable solution to help meet the OAHN shortfall in direct accordance with the Inspector’s post hearing advice (document reference EL6.003a) in terms of locating new development sustainably on the A6 corridor.

No change is recommended to the policy wording, however we would make the point that caution should be exercised with the publication of the Revised NPPF in July 2018. Within this the New Standardised Methodology figures are due in November 2018, thereby replacing the OAHN required since 2012 and moving to the new system of Local Housing Needs Assessments. Yet the figures only apply to Local Plans submitted prior to the 24th January 2019 (paragraph 214).

For further information please refer to our enclosed representations.

Please fill out Part F if you need additional space

For Office Use Only: Date Received

Rep. No.

Q3b 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:

Please fill out Part F if you need additional space

PUBLICATION DRAFT WYRE LOCAL PLAN MAIN MODIFICATIONS 2018 REPRESENTATION FORM

For Office Use Only: Date Received

Rep. No.

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.

Land at Calder House Lane, Bowgreave

Representations to Proposed Main Modifications
to the Wyre Local Plan

Contents

1.	Introduction	1
2.	Background and Site Deliverability	3
3.	Proposed Main Modifications Commentary	5
4.	Summary	11

Appendix 1 – Site Location Plan

Appendix 2 – Illustrative Masterplan

Appendix 3 – Pre-application advice

Appendix 4 – Savills Local Plan Delivery Assessment

1. Introduction

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

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

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

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

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

2. Background and Site Deliverability

Site

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

Sustainability

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

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

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

Background – Deliverability and Developability

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

³ NPPF 2018, Annex 2: Glossary

⁴ NPPF 2018, Annex 2: Glossary

MM/003 - 1060/M/02/C
004 - 1060/M/03/C
005 - 1060/M/04/C



Land at Calder House Lane, Garstang

MM/021 - 1060/M/05/C
022 - 1060/M/06/C
023 - 1060/M/07/C
049 - 1060/M/08/C

3. Proposed Main Modifications Commentary

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

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

The Correct Objectively Assessed Housing Need

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

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

⁶ Document EL7.001a Proposed Main Modifications Paragraph 4.1.11

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

⁸ Submission Document ED010 page 21 updated January 2018.

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

3.9 Our recommendation is therefore as follows:

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

Housing supply

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

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

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

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

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

¹⁰ Table 16 submission Document ED010 updated January 2018

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

Site Allocations without planning permission – delivery assumptions

- 3.13 As set out at Appendix 4 there are unrealistic assumptions being made about completions rates and overall site deliverability on the following sites: SA3/1, SA3/4, SA3/3, SA1/5, SA1/3, SA1/16 and SA4. Our rationale is set out within the commentary section of this table.
- 3.14 Our analysis of these key allocations without planning permission shows that many of the sites have too ambitious assumptions over build out rates and lead in periods and there are inclusions of sites where there is no realistic prospect of coming forward within the plan period. We have also updated the table to account for permissions involving these allocations since the January 2018 paper and the extended allocation of SA1/16.
- 3.15 With this evidence we therefore believe a realistic housing supply figure for these allocations is 1,066 dwellings over the plan period against Turley's comparative figure of 1,577. This equates to a total delivery of 1971 dwellings within allocated sites without planning permission against Wyre's new figure of 2359.

Windfall Allowance

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

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

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

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



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

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

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

MM/089 - 1060/M/09/C
MM/090 - 1060/M/010/C

MM/089-90 – Local Plan Review 1

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

Revisions to the OAHN in light of the Standardised Methodology

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

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

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

¹² Conservation Party Conference 1st October 2018

4. Summary

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

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

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

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

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



Appendix 1

KEY

Site Location



Land at Calder House Lane, Bowgreave
 on behalf of Garstang Golf Club

Note: Reproduced from the Ordnance Survey Map with the permission of the Controller of H.M. Stationery Office. Crown copyright licence number: 100024244. Savills UK Limited, published for the purposes of this information only and although it is shown as being correct, accuracy is not guaranteed. Contains: 2013 Ordnance Survey data and information right.

drawing no. 5401
 new
 scale 1:1,250 @ A3
 drawn by RM
 checked by



drawing site location
 job no. 11
 date 10 December 2015





Appendix 2

Appendix 3

Pre-Application Delegated Report Sheet

Application Number: 15/00158/PREAPP

Proposal: Pre-application meeting for proposed residential development.

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

Applicant: Carrick Sports Ltd

Correspondence Address: c/o Rob Moore
Savills UK Ltd
29 King St
Leeds
LS1 2HL

Case Officer's Report:

Meeting Date: 11th February 2016

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

1.0 RELEVANT PLANNING HISTORY

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

2.0 RELEVANT PLANNING POLICIES

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

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

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

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

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG):

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

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

ADOPTED WYRE BOROUGH LOCAL PLAN (SAVED POLICIES):

2.5 The following policies are of most relevance:

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

SUPPLEMENTARY PLANNING DOCUMENT:

2.6 SPG 2 - Trees on development sites

2.7 SPG 4 - Spacing in new housing developments.

EMERGING LOCAL PLAN:

2.8 The following policies are of most relevance:

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

3.0 RELEVANT SITE CONSTRAINTS

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

4.0 PLANNING ISSUES

4.1 The main issues for consideration would be:

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

Acceptability of residential development in principle

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

Planning obligations

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

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

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

Housing mix and density

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

Residential amenity

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

Visual impact

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

Heritage impact

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

Ecological and arboricultural impact

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

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

Drainage and flood risk

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

Access and highway safety

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

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

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

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

Sustainability considerations

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

Other issues

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

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

5.0 SUBMISSION REQUIREMENTS

5.1 A full application would require the following:

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

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

6.0 OTHER

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

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

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

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

Case Officer's Signature: S. Parker

Senior Officer's Signature: Lydia Harper

Date: 4 March 2016



Appendix 4

