



Wyre Council

**Submission Draft Wyre Local Plan 2018
Statement of Consultation**

Addendum

Proposed Main Modifications

November 2018

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1. Introduction

This Statement of Consultation forms an addendum to the Submission version published in January 2018. It provides details of the formal notification and consultation that took place at the Submission and Proposed Main Modifications stages. It also provides an summary of the representations received to the Proposed Main Modifications and summarises the council's response to the main matters raised.

2. Submission Draft Wyre Local Plan

The Submission Local Plan is the document submitted to the government for examination following the Publication Draft stage. The Submission Local Plan takes into account comments received at Publication stage but is not itself subject to public consultation.

The council submitted its draft Local Plan to the government for Examination on 23 January 2018. In line with Town and Country Planning (Local Planning) (England) 2012 Regulations (SI No.767) Regulation 22 (3), on 31 January the council provided a formal notification to all consultees by e-mail and letter (1,047 recipients) on the Wyre Local Plan database of the fact of submission and the availability of relevant documents. This included letters/e-mail to the specific consultation bodies, Wyre parish and town councils and general consultation bodies, as well as those private individuals held on the local plan database (see Appendix 1.1). The same notification was sent to the Wyre council senior management team and ward members.

The council also made key submission documents as listed in the Notice available for inspection at:

- Wyre Civic Centre
- Fleetwood Library
- Garstang Library
- Knott-End Library
- Poulton-le-Fylde Library
- The Mobile Library

Each deposit location was given copies of the Public Notice and a notice for display publicising the submission (Appendix 1.2).

3. Main Modifications

On 12 September 2018, the council published for public consultation the Wyre Publication Draft Local Plan 2017 Schedule of Main Modifications.

The consultation period was for six-weeks and ended at 5pm 24 October 2018.

The Main Modifications consultation included a suite of documents put on public deposit in the following locations:

- Fleetwood, Garstang, Knott End, Thornton (newly re-opened) and Poulton-le-Fylde libraries.
- Wyre Council Civic Centre reception, Poulton-le-Fylde.
- The rural mobile library and Wyre i-bus.

Documents placed on deposit in the above locations were those previously deposited at earlier stages, plus:

- The Schedule of Main Modifications, including Policies Map
- Sustainability Appraisal Addendum 2018
- Habitats Regulations Assessment August 2018
- Statement of Representations.
- Main Modifications 2018 response form (this was available free for the public to take away).
- Main Modifications 2018 response form guidance note (available free for the public to take away).
- Main Modifications 2018 leaflet/poster (this was available free for the public to take away).

The suite of documents referred to above were placed in the deposit locations on prior to the beginning of the consultation. A poster listing the deposit locations and dates was made available, and displayed, at all deposit locations.

Officers worked closely with staff in all deposit locations to ensure that materials were appropriately located and that materials remained available, including those for the public to take away, during the consultation period.

In light of the important role of the parish and town council's the council again made available to each a set of documents in paper form to use as part of their consultation with their respective communities. The pack consisted of those documents above, including comment forms and guidance notes, posters/leaflets and Statement of Representations.

The above documents were made available to view and download on the council's web site (web address given in the guidance note and leaflet/poster).

Respondents were able to submit responses by the following means:

- Electronically via e-mail direct to the planning policy team at Wyre council
- Directly through the on-line consultation portal hosted on the Wyre council web site;
- By post (or hand) to the planning policy team; and
- By posting comments in special response boxes, located in the reception at the Wyre Civic Centre, Garstang library, Knott-End library, Thornton Library, Poulton-le-Fylde library and Fleetwood (North Albert Street) library.

The comment form was available to download and complete electronically. In one case a request was made to supply the comment form in Word format. This request was complied with.

In addition to the above documents the council also published on its web site (web address given in the guidance note and leaflet/poster):

- EL8.001 Schedule of Additional Modifications August 2018
- EL8.002 Publication Draft Wyre Local Plan 2017 – Tracked Changes (Proposed Modifications), August 2018 (for reference)
- EL8.003 Wyre Borough Council Local Plan Habitats Regulations Assessment Report, August 2018
- EL8.004 Wyre Infrastructure Delivery Plan September 2017 (August 2018 Update)
- EL8.005 Wyre Local Plan Housing Implementation Strategy, August 2018
- EL8.006 Equality Impact Assessment 2017 Addendum (Main Modifications), August 2018
- EL8.007 Level 2 SFRA: Flood Risk Sequential Test Paper: Assessing Flood Risk of Proposed Site Allocations - Addendum SA1/11 North of Norcross Lane, Norcross and SA1/13 Inskip Extension, August 2018
- EL8.008 Green Infrastructure, Open Space, Sport and Recreation Background Paper January 2018 - Addendum, August 2018

The 2018 Main Modifications consultation was publicised in the following ways (Appendix 2). Note that the impact of the General Data Protection Regulations has been to significantly limit the ability of the local plans team to utilise pre-GDPR mailing lists where specific consent to be consulted on local plan matters has not been granted.

1. All consultees (1,027 recipients) on Wyre Local Plan database either written to or emailed by 11 September 2018 (post = 161; email = 866). This included letters to the specific consultation bodies, Wyre parish and town councils and general consultation bodies, as well as those private individuals held on the local plan database.
2. Formal Statement of Representations published and distributed with the consultee letter, made available in the deposit locations and distributed to the parish and town councils,
3. Statutory Public Notice placed in the Blackpool Gazette, Garstang Courier and Fleetwood Weekly News on Wednesday 12 September 2018.
4. e-mail to ward members 11 September 2018 including Statement of Representations, representation form, guidance note and briefing.
5. e-mail to Wyre Council Senior Management Team 11 September 2018 including Statement of Representations and briefing note.
6. Leaflet/poster displayed in the deposit locations and copies made available to the Parish/Town Council's for local dissemination as required.

7. Press release to various newspapers and media contacts including times/dates of events.
8. News release on Wyre Council Home page 12 September 2018
9. Monthly e-newsletter sent 5 September to e-news general list (582 recipients)
10. e-newsletter sent 12 September to e-news consultation contacts (362 recipients)
11. Release on Wyre Council Facebook page (reached 4,813 people) and Twitter account
12. Press coverage – Blackpool Gazette
<https://www.blackpoolgazette.co.uk/news/business/last-chance-to-have-your-say-on-wyres-blueprint-for-the-future-1-9349657>

4. Main Modifications 2018 – Consultation Response

The council has consulted on a schedule of 107 main modifications involving proposed amendments to explanatory text, policy wording and the policies map.

A total of 220 representations were received as valid from 46 individuals and organisations. A significant proportion of responses were made by professional agents on behalf of developer interests and landowners. The council also received two late responses. These have not been considered further.

In summary:

Valid responses = 46

Late (not valid) = 2

Total = 48

At the Main Modifications Stage representations were invited on specific matters, namely:

1. Whether or not the Plan is legally compliant; and
2. Whether or not the Plan is “sound”, that is:

- Positively prepared - This means that the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- Justified - The Local Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
- Effective - The Local Plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities.
- Consistent with national policy - The Local Plan should enable the delivery of sustainable development consistent with the National Planning Policy Framework.

The response form also sought representations on the Sustainability Appraisal Addendum 2018.

The following table summarises the nature of each of the 220 representations:

Question	Responses	Yes	No	Not stated
B1. Do you consider the Local Plan to be legally compliant?	29	21	7	1
C. Do you consider the Local Plan modifications to be “sound”?	171	63	104	4
D. Do you have any comments to make regarding the Sustainability Appraisal?	10			
General comments (i.e. no reference to a specific modification or soundness).	10			
Total	220			

5. Main Modifications (MMs) – Main Matters Raised

A table showing the numerical distribution according to the part of the local plan commented upon (comments on soundness) has been produced at Appendix 3.1 to this report. The council has also produced a summary of the matters raised by each representation received and an appropriate response has been provided – this has been produced as Appendix 3.2.

The council has also published a copy of each representation made – these should be referred to appreciate the full comment made in each case.

Legal Compliance

The council received 29 representations on legal compliance, of which the majority – 21 – considered the Plan to be legally compliant. Of the seven that consider that the plan has failed the test of legal compliance, two offered no supporting narrative.

Of the five that offered further explanation, three were concerned with allocation SA1/13 Inskip Extension, in particular the identification of additional land within the allocation at Dead Dam Bridge. Matters raised in relation to SA1/13 include:

- Failure to co-operate with Fylde Coast authorities on matters relating to housing land supply with particular reference to the relationship between Inskip and Fylde.
- Environmental reports produced by the council are too high level for local impacts to be properly discerned.
- No consultation with the local community on the allocation of the additional land.

Other matters raised outside of SA1/13 concerns include:

- In reference to the Inspector’s Post Hearing Advice (EL6.003b), inconsistency in deeming development to be “disproportionate” at Inskip but not elsewhere, including Poulton-le-Fylde and Garstang.
- The local plan modifications will still exacerbate the areas fundamental problems resulting in a reduced quality of life for residents.
- The number of houses proposed in relation to SA1/8 is unsustainable.

It is the council’s view that these representations although raising pertinent issues from the point of view of those responding do not impact upon the legal compliance of the Local Plan.

Soundness and General Comments

There were 171 comments on the soundness of the Main Modifications. 104 responses were to the effect that the Local Plan is not sound. Respondents were able to identify up to four reasons for non-compliance with the soundness test. Responses against these reasons were:

Reason	Number
Not positively prepared	64
Not justified	49
Not effective	59
Not consistent with national policy	54

The following provides a summary of the matters raised in relation to the content of the Local Plan Main Modifications on the basis of soundness. It is organised by Local Plan chapter and policy. **Please note that this does not cover every issue raised, nor the**

council's full response – please see the council's summary of each representation and full individual response in Appendix 3.2 and the original full representations for further details.

Introduction

MM/001-MM/002

The Introduction details the preparation of the Plan, including reference to legal compliance, the Duty to Cooperate and the process of stakeholder engagement. The council received nine comments on the two relevant MMs, all but one of which were in relation to MM/002. Of the nine responses, five considered the Plan to be sound, with four considering the Plan to be unsound – all of these relating to MM/002 which addresses the Duty to Co-operate. Matters raised include:

- The need to ensure that the proposed local plan partial review will consider the housing need figures across the Fylde Coast authorities in accordance with the new standard methodology for assessing housing needs.
- The partial review should not be secondary to any request for assistance in meeting unmet housing need outside Wyre.
- New text at para. 4.1.5 relating to the Duty to Co-operate does not reflect an agreed position with Blackpool.
- The Local Plan has not been positively prepared, because it does not seek to meet the full Objectively Assessed Housing Need (OAHN).
- The Council has not cooperated effectively with adjoining authorities. To have cooperated effectively, Wyre would have had to achieve its desired result of delivering its unmet need in the wider HMA.
- The timescales for the preparation of the Local Plan partial review are unrealistic.
- There is no mention in the schedule of Main Modifications of any movement since 14 November 2017 demonstrating that Lancaster or Preston are prepared to assist towards meeting the Councils housing needs.

There was some support for the additional wording clarifying the Duty to Co-operate position and support for the early review of the Plan (see Policy LPR1).

Council's Response

Appendix 3.2 provides the council's detailed response to individual representations.

The Inspector in his Post Hearing Advice and having considered all the submitted, written and oral evidence does not direct the council to re-consider the OAHN figure. He refers to the figure of 479 as the OAHN. Comments on the OAHN do not relate to a Main Modification (MM).

The council's compliance with the Duty to Co-operate (DtC) has been considered during the hearing sessions. The Inspector has not raised any issues with regards to the Council's compliance with the DtC in his Post Hearing Advice.

The timetable for the immediate partial review (Policy LPR1) is realistic and in line with the Inspector's direction to submit within 3 years of adoption of the Local Plan. Furthermore MM/002 at paragraph 1.4.7 reiterates the council's commitment to continue engaging with adjoining local authorities with regards to the shortfall of unmet need. The scope of the review is set out in new Policy LPR1 and it is clear that this will include an update of Objectively Assessed Housing Needs. The DtC will apply to the review of the Local Plan. Wyre maintains that the Introduction reflects the position with regards to the Duty to Co-operate and the 'shortfall' against Wyre's OAHN. The review will be undertaken under the auspices of any national standard methodology for calculating housing need extant at the time.

Local Plan Strategy

MM/003

The Local Plan strategy balances competing interests between the protection of the borough's important environmental assets whilst delivering the development that supports the borough's population and businesses. The council proposed a single MM which amended several paragraphs to give greater clarity to strategic intent, including a modified minimum housing delivery figure and reference to continuing engagement with adjoining local authorities to address any shortfall against the Objectively Assessed Housing Need (OAHN)

Of the 14 responses, four considered the Plan to be sound, with ten considering the Plan to be unsound – most relating to the OAHN. Matters raised include:

- Wyre are now able to deliver a housing figure that is within the identified range and as such a shortfall in housing delivery does not exist.
- Amended text in para. 4.1.21 in relation to co-operation with adjoining authorities to address a shortfall in meeting housing needs is therefore not required.
- The proposed early review is predicated on a failure to meet the OAHN. However the deficiency is only 3% of the original 479 figure. This appears approach inconsistent with that taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan where a figure within a range was accepted as the OAHN.
- The OAHN should be met in full. There remains a significant shortfall of 295 dwellings over the plan-period. No evidence of a balancing exercise being carried out for the purposes of paragraph 14(b) of the NPPF.
- It is not clear whether the Council now concedes that there are no highways constraints in terms of the 479dpa figure being met in full.
- The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility. Concern that sites within the housing trajectory will not be built out at the rates envisioned, highlighting a lack of contingency in ensuring that the constrained housing requirement is met.

- Lack of evidence that the windfall allowance can be delivered.
- The 'managed dispersal' strategy is likely to increase reliance on private vehicle and longer distance travel. The Lancashire County Council report is not a sound basis upon which to base a Development Strategy.
- The scale of development proposed is not supported by the necessary infrastructure including employment, and does not fit with the Vision or strategy which emphasises the identity of settlements and contribution of the historic environment to the character of the borough.
- There should be stronger reference to those aspects that contribute to settlement identity/setting. The Plan should recognise that there are instances where the open countryside plays an important role in defining character in addition to its own inherent qualities.
- Disagree that the council has had proper regard to matters such as flood risk and the sustainability of settlements (e.g. Inskip).

There was support for the commitment to an early review to address housing delivery issues and specific support for development at Norcross and in Poulton-le-Fylde.

Council Response

Appendix 3.2 provides the council's detailed response to individual representations.

A key concern of representors relates to the OAHN. The Inspector in his Post Hearing Advice and having considered all the submitted, written and oral evidence has considered this matter. He does not direct the Council to re-consider the OAHN housing figure which he refers to as 479 dwellings p.a. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAHN range is wrong. However, the shortfall amounts to less than a year's supply over the period to 2031 and will be addressed through the immediate partial review of the Local Plan (Policy LPR1). The review will include a review of transport and highway issues as set out in Policy LPR1.

The Inspector's has considered the housing trajectory which was published with the 'Publication' draft Local Plan together with any comments made and has advised some amendments in his Post Hearing Advice. These are reflected in the Housing Trajectory included in the Housing Implementation Strategy (EL8.005). The council has not received any compelling evidence through the consultation on Main Modifications that delivery rates will not be met.

The Plan strategy remains one of 'managed dispersal' albeit altered by the Inspector and transport and flooding have been major considerations in influencing the strategy. The MMs take on board any changes to the Development Strategy as directed by the Inspector having considered all written and oral evidence pre and during the hearing sessions.

The evidence base regarding highway matters will be subject to review as set out in Policy LPR1.

Strategic Policies

MM/004-MM/013

The Strategic Policies set out the overall framework for development in Wyre aiming to ensure that development takes place within environmental limits. The Strategic Policies chapter contains eight policies setting out the development strategy. It establishes policies for strategic designations (including the Green Belt and countryside), viability, infrastructure provision and health.

The council proposes ten modifications that cover the chapter introduction, introductions to policies and the policies themselves. The council has received 35 representations in relation to the Strategic Policies, of which 14 were supportive and 21 consider the Plan to be unsound.

Of the latter, six were in relation to MM/004 and which refers to the Local Plan meeting 97% of the OAN figure, whilst a further seven focused on the development strategy set by Policy SP1 (MM/005). Comments made largely reflect those made under MM/003 and as such it is not necessary to repeat them. Other matters raised focus on matters relating to the protection of the countryside, the setting of settlements and over development along the A6 corridor, and a concern that settlement boundaries will be breached.

Further concerns included a number relating to Policy SP2 Sustainable Development (MM/006):

- The modification to SP2 does not sufficiently reflect the seriousness of the impact of climate change.
- The requirement that all development “contributes positively to overall physical, social, environmental and economic character of the area in which the development is located” is not explained in terms of how this might be achieved and measured.
- The settlement boundaries do not provide a positive approach to meeting development needs. Their use would create a presumption against development even if development was sustainable.

The remaining representations include support for the increase in housing provision (MM/004), text explaining the Green Belt position (MM/007) particularly in relation to land at Poulton-le-Fylde and Norcross, flexibility in relation to the operation of Policy SP6 – Viability (MM/011), and for the policy in relation to the Area of Outstanding natural Beauty (SP5 – MM/010).

Council Response

Appendix 3.2 provides the council’s detailed response to individual representations.

The council’s response on matters relating to the OAHN and supply issues is set out above.

In terms of Policy SP2, this is a strategic policy designed to set the broad strategic framework within which the more detailed policies sit. It reflects the concern of national planning guidance with the three elements of sustainability - economic, social and environmental. The detailed policies of the Local Plan give force to the strategic

requirements of Policy SP2. Section 10 of the Plan establishes a monitoring framework. It is also noted that settlement boundaries are not subject to MMs.

Core Development Management Policies

MM/014 – MM/020

The Core Development Management Policies provide the general development management policy framework. The council propose seven modifications which mostly involve detailed wording changes to policy wording. A total of eight representations have been received on this section of the Plan, of which three consider the Plan to be unsound. The three representations raise the following matters:

- A concern that flood management schemes must be strictly managed (MM/015)
- Proposed additional wording to the text of CDMP3 Design extending the factors that will be considered when considering design issues (MM/016)
- In relation to Policy CDMP4 (Environmental Assets) the definition and examples of “unacceptable cumulative impact” needs to be fleshed out so that residents can measure these impacts (MM/018)

Responses finding the Plan sound, included support for a stronger policy approach to protecting air quality (MM/014 - Policy CDMP1) and for flexibility in the requirement for electric vehicle charging points (MM/020 - CDMP6).

Council’s Response

Appendix 3.2 provides the council’s detailed response to individual representations.

Matters raised by representors considering the Plan to be unsound have been noted but are more general in nature and not sufficiently specific to a Main Modification or promote amendments that are not considered to be appropriate or conflict with national planning policy.

Housing

MM/21 – MM/35

The housing section establishes the housing supply position for the plan period and sets out the requirements for new housing developments including policies on housing mix and affordable housing. The council has made 15 MMs to this section which has generated a total of 32 representations, of which 12 are in support and 20 consider the Plan to be unsound.

17 of the 20 representations considering the Plan to be unsound are concerned with only three MMs that reference the housing supply, itself directly related to the OAHN (MM/021, MM/022 and MM/023). These largely repeat those made in response to the strategic policies detailed above. Additional matters raised include:

- Regarding the delivery of homes which are suitable and capable of meeting the needs for older people, the council should provide further guidance which sets out how it will work with developers and housing associations to deliver the necessary homes (MM/021).

- The Local plan seeks to ensure a mix of housing. Developers are now advertising along the A6 3/4/5 bed homes which will not satisfy the need for smaller homes for young families (MM/021).
- The Sedgefield method is the most appropriate method of making up the shortfall in housing delivery (MM/022)

The remaining three responses raised the following matters:

- Adequate screening required in the location of the allocation for a showpersons yard (SA6).
- Insufficient smaller homes being built.
- Policy HP10 Houses in Multiple Occupation is too onerous in requiring the living conditions of nearby residents to be considered.

Responses finding the Plan sound included support for the council's approach to housing mix, affordable housing and green infrastructure in housing developments.

Council's Response

Appendix 3.2 provides the council's detailed response to individual representations.

The council's response on matters relating to the OAHN and supply issues is set out above. The merits of the Liverpool vs Sedgefield approach was debated during the hearings and the Inspector has reached his conclusions having also considered all other relevant evidence.

Comments in relation to dwelling showpeople, mix and type of properties being built are noted but are not sufficiently specific to the change proposed by the Main Modification. In relation to guidance for housing for older people, this is a matter of implementation rather than policy. In relation to houses in multiple occupation, the modification is a clarification of the policy as expressed in the Publication Draft Local Plan and is considered appropriate.

Economy

MM/036 – MM/046

The economy section of the Plan establishes the employment land supply and policies relating to existing employment areas plus those for town centre and retail uses, renewable energy, telecommunications and security shutters. The council has made eleven MMs to this section. The council received six responses, all considering the Plan to be sound.

Site Allocations

MM/047 – MM/088

The site allocations section of the plan contains seven policies that allocate specific sites for development.

The council has made a total of 42 MMs to the site allocations.

The council received 10 responses that focused on the introduction to the site allocations section and the introductory narrative to Policy SA1 – Residential Development. Of these, eight consider the Plan to be unsound with comments including further references to the failure to meet the OAHN. A view was also expressed that the council's requirement for a masterplan and the requirements of its published guidance on the preparation of masterplans will act as a barrier to delivery.

The council received 25 responses to MMs relating to 11 residential allocations (SA1). Of these, four were supportive whilst 20 considered an allocation to be unsound (one did not state whether the plan is sound or unsound). Of these 20, four related to SA1/13 Inskip Extension, where particular concern was raised about the scale of development and the identification of an additional area of land. There were also similar concerns raised about the allocation of additional land at SA1/16 Cockerham Road, Garstang, whilst developer and landowner interests raised matters relating to individual site requirements as expressed by the relevant policy, or sought an increase in site area to accommodate additional development.

Five representations were made against mixed use allocations (SA3). Of these, four considered the relevant allocation unsound whilst the remaining representation did not express view on soundness. Issues raised included:

- A concern that a requirement for masterplanning is unnecessary and will delay the implementation of development.
- A request that site capacities should be treated termed as “anticipated delivery”.
- A concern that home owner packs in relation to sites in proximity to Morecambe Bay are unnecessary.
- Reference to finished floor levels in relation to sites where there is a flood risk should reflect government guidance (Environment Agency).

A single representation was made against SA4 Hiillhouse and a single representation was made against SA5 Port of Fleetwood, both from the Environment Agency pointing to a need to reflect government guidance in relation to finished floor levels and, in the case of the latter, relating to easement requirements.

In some cases, notably relating to SA1/13 Inskip Extension, representors also sought amendments to allocation boundaries on the Policies Map (MM/094 – MM/108).

Council’s Response

Appendix 3.2 provides the council’s detailed response to individual representations.

The council’s response on matters relating to the OAHN and supply issues is set out above.

The requirement for the preparation of masterplans is not an MM matter and was debated where concerns were raised at the hearing sessions. It is the council's view that the preparation of a masterplan will not affect delivery. The Inspector has examined the housing trajectory with the requirement in mind. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing.

In terms of individual allocations, the council's response can be found in Appendix 3.2. Overall, it is the council's view that the allocations have been appropriately made and properly take into account the Inspector's Post Hearing Advice. In some cases representations raise matters not subject to a MM or matters that have already been subject to the local plan examination.

Monitoring the Local Plan

MM/089 – MM/091

This section of the Plan establishes a monitoring framework for the Local Plan. It also includes a new policy to give force to a partial review of the Local Plan (LPR1 – MM/090). This section generated 17 representations, of which eight were supportive and nine consider the Plan to be unsound. In relation to the latter, comments included:

- There is no shortfall in housing need.
- The proposed local plan review will need to consider the housing need figures across the Fylde Coast authorities in accordance with the new standard methodology for assessing housing needs.
- The need for an immediate local plan review demonstrates that the Plan is not sound. The council failed to ensure it had strong highway evidence. A review does not represent positive planning.
- Commencing the partial review straight so soon after adoption is unrealistic. A revised timetable should be prepared which considers the adoption date of the Local Plan and forecasts a reasonable timetable for the preparation of a review.
- The Council should make every effort to significantly boost the supply of housing within the short-term, and the housing land supply position should far exceed the 5-year minimum figure in order to provide an element of flexibility going forwards
- The review should be carried out immediately upon adoption rather than waiting until the end of 2019.

The review process also found support from a range of interested parties.

Council Response

Appendix 3.2 provides the council's detailed response to individual representations.

Matters relating to the OAHN have been addressed above. The council consider that the timetable for the immediate review is realistic and in line with the Inspector's direction to submit within 3 years of adoption of the Local Plan. The purpose of the review is to consider the issue of unmet need and highway matters. The Duty to Co-operate and the government's standard methodology for calculating housing need will apply to the review of the local Plan. The Plan will be adopted with a five year supply in place.

Sustainability Appraisal

The council has received 10 representations relating to the Sustainability Appraisal Addendum 2018 (SA). Of these, two raised no comments whilst a third identified a typographical error. The remaining seven responses raised a number of matters, including:

- No assessment of the 3% deficiency in delivery associated with 464dpa and whether it will be delivered in Wyre. The Sustainability Appraisal should contain an appraisal of the unmet need (associated with the figure of 479dpa) having to be met in neighbouring authorities.
- The SA does not properly examine the consequences of a shortfall in the OAHN of 295 dwellings. It is not accepted that the impact of not meeting the OAHN is "very small" and that the 464 dpa housing figure will enhance the vitality of small villages as implied by the SA. The failure to meet the OAHN would result in significantly adverse social and economic impacts, including on the need for affordable housing. Section 2 does not address the advantages and disadvantages of addressing the shortfall of 295 dwellings over the plan period.
- Concerns raised regarding the sustainability of the scale of development proposed in Great Eccleston and Inskip.
- The Revised Site Assessment tables in Section 4, in particular for site allocations SA1/8 South of Blackpool Road and SA1/9 South Stalmine, recommend that appropriate ecological surveys are undertaken and where possible, lost habitats are recreated or enhanced. However, the policy wording for both these allocations does not reflect this and the references to ecological mitigation is proposed to be removed.
- Lack of detailed SA. The SA should be amended in light of the Modifications. Changes to Inskip are locally significant. Not clear how the conclusion of a lack of impacts on Inskip has been reached. Lack of recognition in the SA of rural issues/impacts - overly urban focused. Should not be a one-size-sits-all approach. The SA should be updated for rural areas.

Council's Response

Appendix 3.2 provides the council's detailed response to individual representations.

The Sustainability Appraisal Addendum (EL7.002) notes that the differences in housing numbers between the preferred OAHN and the higher and lower options is very small and it is not considered that the differences in assessment are significant in terms of the SA. The Local Plan proposes a new Policy LPR1 that commits the Council to undertake an early partial review of the Local Plan to address the housing shortfall. The partial review will consider an update of the housing OAHN and a review of transport and highway issues. This subsequent review will be supported by a SA.

Matters regarding the sustainability of Inskip and Great Eccleston have already been considered by the Inspector as part of the Local Plan examination process.

An additional modification is proposed to the Local Plan to delete ecological mitigation wording within the site allocations key development considerations. This is proposed for consistency and all site allocations would have to comply with policy CDNP4 Environmental Assets. Therefore, the repetition of this text within some site allocation key development

considerations is considered superfluous. The Council is satisfied that all recommendations in the SA are carried forward within the Local Plan.

The Sustainability Appraisal (SA) has followed a systematic process to evaluate the Local Plan and the site allocations which has informed the development of the Local Plan. Table 3-1 (page 10) of the main SA report (SD005a) sets out the specific requirements that need to be fulfilled and how this has been met through the Local Plan SA. The site allocations have been assessed against the site assessment criteria set out in appendix E. The methodology should not be different for a rural site allocation.

General Comments

The council received ten comments that were not made against a Main Modification. In some cases the respondent simply wished to log a “no comment” response. As these representations do not relate to a Main Modification the council notes the content but has no further comment to make.