



## **Wyre Council**

**Submission Draft Wyre Local Plan 2018**

**Proposed Main Modifications**

**Statement of Consultation**

**Addendum**

**Appendix 3.2**

**November 2018**

**WYRE LOCAL PLAN  
STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018  
APPENDIX 3.2  
RESPONSES TO THE MAIN MODIFICATIONS  
Table 1 - Introduction**

**The representation summaries use as much of the original wording as possible, however in the interests of brevity and proportionality, this has not always been possible. In all cases, reference should be made to the original representation for the full details.**

This set of spreadsheet tables provides:

Table 1	Introduction
Table 2	Representations Index by name/organisation
Table 3	Full index of representations
Table 4	Summary of representations on legal compliance
Table 5a	Summary of the Main Modifications representations (soundness) (Unique Reference Order)
Table 5b	Summary of the Main Modifications representations (soundness) (Main Modification Reference Order)
Table 6	Summary of representations on the Sustainability Appraisal
Table 7	Summary of general comments
Table 8	Responses on appearance at the sitting session of the Public Examination

Individual representors have been allocated a unique reference number, e.g. 0001.  
Each representation has been given a unique reference number consisting of:

personal ID/local plan stage (M for Mods)/representation number/type of representation code

The type of representation code is as follows:

- B1 - Legal Compliance
- C - Soundness
- GC - General Comment
- D - Sustainability Appraisal

A number of representors have indicated that they do not wish to be contacted further about the Local Plan process. This is indicated by \* against the name of that person in Table 1 and Table 2 and the designation DNC (Do Not Contact)

Representations have been logged against the part of the Plan stimulated by the respondent unless the council has considered that the detail of the response is better recorded against an alternative part of the Plan.

WYRE LOCAL PLAN			
STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018			
APPENDIX 3.2			
RESPONSES TO THE MAIN MODIFICATIONS			
Table 2 - by Representor Name/Organisation			
ID	Name	Organisation	Agent
0023	Robert Cooke	n/a	n/a
0032	Jane Saleh	Blackpool Council	n/a
0051	Robert Fail	Wyre Labour Group of Councillors	n/a
0072	Howard Phillips	Thornton Action Group	n/a
0172	Trudie Webster	Ingle's Dawndew Salad	Katie Delaney, Maybern Planning and Development
0222	Ric Dumbleton	n/a	n/a
0290	Mark Evans	Fylde Council	n/a
0297	Joanne Harding	Home Builders Federation	n/a
0343	Warren Hilton	Highways England	n/a
0358	Matthew Symonds	Hollins Strategic Land	n/a
0363	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields
0385	Rachel Crompton	Local Lead Flood Authority	n/a
0398	Alexis De Pol	De Pol Associates	n/a
0458	Dr Louise Banton	Cabus Parish Council	n/a
0473	Mr P Barnett	n/a	Stephen Harris, Emery Planning
0454	Edwina Parry	Garstang Town Council	n/a
0616	John Hallas	Claughton on Brock Parish Council	n/a
0645	n/a	Nether Wyresdale Parish Council	n/a
0654	James Procter	n/a	n/a
0659	Mike Ainsworth	Inskip-with-Sowerby Parish Council	n/a
0671	Glyn Stead	Little Eccleston with Larbreck Parish Council	n/a
0676	Alex Hazel	Environment Agency	n/a
0684	Tim Bettany-Simmons	The Canal & River Trust	n/a
0766	Andrew, Robert & Amanda Chippendale	AR & A Chippendale Farming Partnership	n/a
0774	Bruce Ramsden	n/a	n/a
0785	John Carr	n/a	GA Associates
0794a	n/a	Wainhomes	Chris Betteridge, De Pol Associates
0794b	n/a	Wainhomes	Stephen Harris, Emery Planning
0808	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP
0845	Elizabeth Knowles	Natural England	n/a
0902	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Associates
0930	Robin Buckley	Redrow Homes Ltd	Graham Trehwella, Cass Associates Ltd
0937	n/a	Bourne Leisure Ltd	Nathan Matta, Lichfields
0941	John Fleming	Gladman Developments Ltd	n/a
0944	n/a	Applethwaite Ltd	Graham Love, Smith and Love Planning Consultants
0947	J and R Parkinson	n/a	Graham Love, Smith and Love Planning Consultants
0953	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants
0962	n/a	Metacre	Alexis De Pol, De Pol Associates
0963	Paul Smith	Strategic Land Group	n/a
0987	Elaine Deegan	n/a	John Knight
0995	Paul Desborough	Inskip Residents Action Group	n/a
1015	Philip James	n/a	n/a
1055	Emily Hrycan	Historic England	n/a
1058	Barbara Sumner	n/a	n/a
1059	Jane Readman	n/a	n/a
1060	n/a	Carrick Sports Ltd	Rob Moore, Savills

<b>WYRE LOCAL PLAN</b>							
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<b>APPENDIX 3.2</b>							
<b>RESPONSES TO THE MAIN MODIFICATIONS</b>							
<b>Table 3 - Full Index of Representations</b>							
<b>Personal ID</b>	<b>Unique Ref</b>	<b>Name</b>	<b>Organisation</b>	<b>Agent</b>	<b>Mod Ref.</b>	<b>Local Plan Ref./SA (D) Ref/Other</b>	<b>Code</b>
0023	0023/M/01/B1	Robert Cooke	n/a	n/a	n/a	n/a	B1
0032	0032/M/01/C	Jane Saleh	Blackpool Council	n/a	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0032	0032/M/02/C	Jane Saleh	Blackpool Council	n/a	MM/003	Local Plan Strategy	C
0032	0032/M/03/C	Jane Saleh	Blackpool Council	n/a	MM/004	Strategic Policies (5.1 Introduction)	C
0032	0032/M/04/C	Jane Saleh	Blackpool Council	n/a	MM/021	Housing (7.1 Introduction)	C
0032	0032/M/05/C	Jane Saleh	Blackpool Council	n/a	MM/048	Site Allocations (9.2 Residential Developments)	C
0032	0032/M/06/C	Jane Saleh	Blackpool Council	n/a	MM/089	Monitoring the Local Plan	C
0032	0032/M/07/C	Jane Saleh	Blackpool Council	n/a	MM/090	LPR1 Wyre Local Plan Review	C
0051	0051/M/01/B1	Robert Fail	Wyre Labour Group of Councillors	n/a	n/a	n/a	B1
0051	0051/M/02/C	Robert Fail	Wyre Labour Group of Councillors	n/a	MM/003	Local Plan Strategy (Appendix E)	C
0051	0051/M/03/C	Robert Fail	Wyre Labour Group of Councillors	n/a	MM/006	Policy SP2 Sustainable Development	C
0051	0051/M/04/C	Robert Fail	Wyre Labour Group of Councillors	n/a	MM/013	Policy SP8 Health and Well-Being	C
0051	0051/M/05/C	Robert Fail	Wyre Labour Group of Councillors	n/a	MM/014	Policy CDMP1 Environmental Protection	C
0051	0051/M/06/C	Robert Fail	Wyre Labour Group of Councillors	n/a	MM/024	Housing (7.3 Housing Mix)	C
0072	0072/M/01/B1	Howard Phillips	Thornton Action Group	n/a	n/a	n/a	B1
0072	0072/M/02/C	Howard Phillips	Thornton Action Group	n/a	MM/099	Policies Map SA1/2 Lambs Road/Raikes Road, Thornton	C
0072	0072/M/03/C	Howard Phillips	Thornton Action Group	n/a	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton	C
0172	0172/M/01/B1	Trudie Webster	Ingle's Dawndew Salad	Katie Delaney, Maybern Planning and Development	n/a	n/a	B1
0172	0172/M/02/C	Trudie Webster	Ingle's Dawndew Salad	Katie Delaney, Maybern Planning and Development	MM/022	Housing (7.2 Housing land Supply)	C
0222	0222/M/02/C	Ric Dumbleton	n/a	n/a	n/a	n/a	C
0290	0290/M/01/C	Mark Evans	Fylde Council	n/a	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0290	0290/M/02/C	Mark Evans	Fylde Council	n/a	MM/003	Local Plan Strategy	C
0290	0290/M/03/C	Mark Evans	Fylde Council	n/a	MM/004	Strategic Policies (5.1 Introduction)	C
0290	0290/M/04/C	Mark Evans	Fylde Council	n/a	MM/021	Housing (7.1 Introduction)	C
0290	0290/M/05/C	Mark Evans	Fylde Council	n/a	MM/048	Site Allocations (9.2 Residential Developments)	C
0290	0290/M/06/C	Mark Evans	Fylde Council	n/a	MM/089	Monitoring the Local Plan	C
0290	0290/M/07/C	Mark Evans	Fylde Council	n/a	MM/090	LPR1 Wyre Local Plan Review	C
0290	0290/M/08/D	Mark Evans	Fylde Council	n/a	n/a	n/a	D
0297	0297/M/01/C	Joanne Harding	Home Builders Federation	n/a	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0297	0297/M/02/C	Joanne Harding	Home Builders Federation	n/a	MM/003	Local Plan Strategy	C
0297	0297/M/03/C	Joanne Harding	Home Builders Federation	n/a	MM/004	Strategic Policies (5.1 Introduction)	C
0297	0297/M/04/C	Joanne Harding	Home Builders Federation	n/a	MM/005	Policy SP1 Development Strategy	C
0297	0297/M/05/C	Joanne Harding	Home Builders Federation	n/a	MM/022	Housing (7.2 Housing land Supply)	C
0297	0297/M/06/C	Joanne Harding	Home Builders Federation	n/a	MM/023	Policy HP1 Housing Land Supply	C
0297	0297/M/07/C	Joanne Harding	Home Builders Federation	n/a	MM/024	Housing (7.3 Housing Mix)	C
0297	0297/M/08/C	Joanne Harding	Home Builders Federation	n/a	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	C
0297	0297/M/09/C	Joanne Harding	Home Builders Federation	n/a	MM/034	Policy HP9 Green Infrastructure in New Residential Developments	C
0297	0297/M/10/C	Joanne Harding	Home Builders Federation	n/a	MM/089	Monitoring the Local Plan	C
0297	0297/M/11/C	Joanne Harding	Home Builders Federation	n/a	MM/090	LPR1 Wyre Local Plan Review	C
0297	0297/M/12/C	Joanne Harding	Home Builders Federation	n/a	MM/091	Table 10.1	C
0343	0343/M/01/C	Warren Hilton	Highways England	n/a	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0343	0343/M/02/C	Warren Hilton	Highways England	n/a	MM/003	Local Plan Strategy	C

RESPONSES TO THE MAIN MODIFICATIONS							
Table 3 - Full Index of Representations							
Personal ID	Unique Ref	Name	Organisation	Agent	Mod Ref.	Local Plan Ref./SA (D) Ref/Other	Code
0343	0343/M/03/C	Warren Hilton	Highways England	n/a	MM/005	Policy SP1 Development Strategy	C
0343	0343/M/04/C	Warren Hilton	Highways England	n/a	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	C
0343	0343/M/05/C	Warren Hilton	Highways England	n/a	MM/036	Economy (8.2 Employment Land Supply)	C
0343	0343/M/06/C	Warren Hilton	Highways England	n/a	MM/037	Policy EP1 Employment Land Supply	C
0358	0358/M/01/B1	Matthew Symonds	Hollins Strategic Land	n/a	n/a	n/a	B1
0358	0358/M/02/C	Matthew Symonds	Hollins Strategic Land	n/a	MM/022	Housing (7.2 Housing land Supply)	C
0358	0358/M/03/C	Matthew Symonds	Hollins Strategic Land	n/a	MM/047	Site Allocations	C
0358	0358/M/04/C	Matthew Symonds	Hollins Strategic Land	n/a	MM/083	SA3/4 Forton Extension	C
0358	0358/M/05/C	Matthew Symonds	Hollins Strategic Land	n/a	MM/090	LPR1 Wyre Local Plan Review	C
0363	0363/M/01/B1	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	n/a	n/a	B1
0363	0363/M/02/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0363	0363/M/03/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/004	Strategic Policies (5.1 Introduction)	C
0363	0363/M/04/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/020	Policy CDMP6 Accessibility and Transport	C
0363	0363/M/05/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/021	Housing (7.1 Introduction)	C
0363	0363/M/06/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/022	Housing (7.2 Housing land Supply)	C
0363	0363/M/07/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/023	Policy HP1 Housing Land Supply	C
0363	0363/M/08/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/024	Housing (7.3 Housing Mix)	C
0363	0363/M/09/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/065	SA1/16 West of Cockerham Road, Garstang	C
0363	0363/M/10/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/090	LPR1 Wyre Local Plan Review	C
0363	0363/M/11/C	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang	C
0385	0385/M/01/GC	Rachel Crompton	Lancashire County Council - Local Lead Flood Authority	n/a	n/a	n/a	GC
0398	0398/M/01/B1	Alexis De Pol	De Pol Assoc.	n/a	n/a	n/a	B1
0398	0398/M/02/C	Alexis De Pol	De Pol Assoc.	n/a	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde	C
0458	0458/M/01/B1	Dr Louise Banton	Cabus Parish Council	n/a	n/a	n/a	B1
0458	0458/M/02/C	Dr Louise Banton	Cabus Parish Council	n/a	MM/065	SA1/16 West of Cockerham Road, Garstang	C
0458	0458/M/03/C	Dr Louise Banton	Cabus Parish Council	n/a	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang	C
0473	0473/M/01/B1	Mr P Barnett	n/a	Stephen Harris, Emery Planning	n/a	n/a	B1
0473	0473/M/02/C	Mr P Barnett	n/a	Stephen Harris, Emery Planning	MM/005	Policy SP1 Development Strategy	C
0473	0473/M/03/D	Mr P Barnett	n/a	Stephen Harris, Emery Planning	n/a	Section 1, Section 2	D
0545	0545/M/01/C	Edwina Parry	Garstang Town Council	n/a	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0545	0545/M/02/GC	Edwina Parry	Garstang Town Council	n/a	n/a	Spatial Portrait	GC
0545	0545/M/03/C	Edwina Parry	Garstang Town Council	n/a	MM/003	Local Plan Strategy	C
0545	0545/M/04/C	Edwina Parry	Garstang Town Council	n/a	MM/004	Strategic Policies (5.1 Introduction)	C
0545	0545/M/05/C	Edwina Parry	Garstang Town Council	n/a	MM/005	Policy SP1 Development Strategy	C
0545	0545/M/06/C	Edwina Parry	Garstang Town Council	n/a	MM/006	Policy SP2 Sustainable Development	C
0545	0545/M/07/C	Edwina Parry	Garstang Town Council	n/a	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4 Countryside Areas	C
0545	0545/M/08/C	Edwina Parry	Garstang Town Council	n/a	MM/013	Policy SP8 Health and Well-Being	C
0545	0545/M/09/C	Edwina Parry	Garstang Town Council	n/a	MM/015	Policy CDMP2 Flood Risk and Surface Water Management	C
0545	0545/M/10/C	Edwina Parry	Garstang Town Council	n/a	MM/018	Policy CDMP4 Environmental Assets	C
0545	0545/M/11/C	Edwina Parry	Garstang Town Council	n/a	MM/021	Housing (7.1 Introduction)	C
0545	0545/M/12/C	Edwina Parry	Garstang Town Council	n/a	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	C
0545	0545/M/13/C	Edwina Parry	Garstang Town Council	n/a	MM/032	Policy HP8 Accommodation for Gypsy, Travellers and Travelling Showpeople	C
0545	0545/M/14/GC	Edwina Parry	Garstang Town Council	n/a	n/a	Economy section	GC
0545	0545/M/15/C	Edwina Parry	Garstang Town Council	n/a	MM/047	Site Allocations	C

RESPONSES TO THE MAIN MODIFICATIONS							
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Personal ID	Unique Ref	Name	Organisation	Agent	Mod Ref.	Local Plan Ref./SA (D) Ref/Other	Code
0545	0545/M/16/C	Edwina Parry	Garstang Town Council	n/a	MM/065	SA1/16 West of Cockerham Road, Garstang	C
0545	0545/M/17/C	Edwina Parry	Garstang Town Council	n/a	MM/066	SA1/17 Land South of Prospect Farm, Garstang	C
0545	0545/M/18/C	Edwina Parry	Garstang Town Council	n/a	MM/067	SA1/18 South of Kepple Lane, Garstang	C
0616	0616/M/01/B1	John Hallas	Claughton on Brock Parish Council	n/a	n/a		B1
0616	0616/M02/C	John Hallas	Claughton on Brock Parish Council	n/a	MM/010	Strategic Policies (5.6 Forest of Bowland AONB) and Policy SP5 Forest of Bowland AONB	C
0645	0645/M/01/C	n/a	Nether Wyresdale Parish Council	n/a	MM/003	Local Plan Strategy	C
0645	0645/M/02/C	n/a	Nether Wyresdale Parish Council	n/a	MM/006	Policy SP2 Sustainable Development	C
0645	0645/M/03/C	n/a	Nether Wyresdale Parish Council	n/a	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4 Countryside Areas	C
0645	0645/M/04/C	n/a	Nether Wyresdale Parish Council	n/a	MM/010	Strategic Policies (5.6 Forest of Bowland AONB) and Policy SP5 Forest of Bowland AONB	C
0645	0645/M/05/C	n/a	Nether Wyresdale Parish Council	n/a	MM/016	Policy CDMP3 Design	C
0645	0645/M/06/C	n/a	Nether Wyresdale Parish Council	n/a	MM/017	Core Development Management Policies (6.5 Environmental Assets)	C
0645	0645/M/07/C	n/a	Nether Wyresdale Parish Council	n/a	MM/019	Policy CDMP5 Historic Environment	C
0645	0645/M/08/C	n/a	Nether Wyresdale Parish Council	n/a	MM/022	Housing (7.2 Housing land Supply)	C
0645	0645/M/09/C	n/a	Nether Wyresdale Parish Council	n/a	MM/028	Policy HP6 - Rural Workers Accommodation in the Countryside	C
0645	0645/M/10/C	n/a	Nether Wyresdale Parish Council	n/a	MM/044	Economy (8.9 Holiday Accommodation) and Policy EP9	C
0645	0645/M/011/C	n/a	Nether Wyresdale Parish Council	n/a	MM/046	Economy 8.11 and Policy EP11 Protection of Community Facilities in Rural Areas	C
0645	0645/M/012/C	n/a	Nether Wyresdale Parish Council	n/a	MM/089	Monitoring the Local Plan	C
0654	0654/M/01/B1	James Procter	n/a	n/a	MM/102	Policies Map SA1/13 Inskip Extension	B1
0654	0654/M/02/C	James Procter	n/a	n/a	MM/102	Policies Map SA1/13 Inskip Extension	C
0654	0654/M/03/D	James Procter	n/a	n/a	n/a	SA1/13	D
0659	0659/M/01/B1	Mike Ainsworth	Inskip-with-Sowerby Parish Council	n/a	n/a	n/a	B1
0659	0659/M/02/C	Mike Ainsworth	Inskip-with-Sowerby Parish Council	n/a	MM/062	SA1/13 Inskip Extension	C
0659	0659/M/03/D	Mike Ainsworth	Inskip-with-Sowerby Parish Council	n/a	n/a	n/a	D
0671	0671/M/01/B1	Glyn Stead	Little Ecclestone with Larbreck Parish Council	n/a	n/a	n/a	B1
0671	0671/M/02/D	Glyn Stead	Little Ecclestone with Larbreck Parish Council	n/a	n/a	Page 77	D
0676	0676/M/01/GC	Alex Hazel	Environment Agency	n/a	n/a	SFRA Sequential Test (EL8.007)	GC
0676	0676/M/02/GC	Alex Hazel	Environment Agency	n/a	n/a	n/a	GC
0676	0676/M/03/GC	Alex Hazel	Environment Agency	n/a	n/a	n/a	GC
0676	0676/M/04/C	Alex Hazel	Environment Agency	n/a	MM/050	SA1/1 West of Broadway, Fleetwood	C
0676	0676/M/05/C	Alex Hazel	Environment Agency	n/a	MM/080	SA3/1 Fleetwood Dock and Marina	C
0676	0676/M/06/C	Alex Hazel	Environment Agency	n/a	MM/085	SA4 Hillhouse Technology Enterprise Zone, Thornton	C
0676	0676/M/07/C	Alex Hazel	Environment Agency	n/a	MM/086	SA5 Port of Fleetwood	C
0684	0684/M/01/GC	Tim Bettany-Simmons	The Canal & River Trust	n/a	n/a	n/a	GC
0766	0766/M/01/B1	Andrew, Robert & Amanda Chippendale	AR & A Chippendale Farming Partnership	n/a	n/a	n/a	B1
0766	0766/M/02/C	Andrew, Robert & Amanda Chippendale	AR & A Chippendale Farming Partnership	n/a	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang	C
0774	0774/M/01/B1	Bruce Ramsden	n/a	n/a	n/a	n/a	B1
0774	0774/M/02/C	Bruce Ramsden	n/a	n/a	MM/052	SA1/3 Land Between Fleetwood Road North and Pheasant Wood, Thornton	C
0785	0785/M/01/C	John Carr	n/a	GA Associates	MM/083	SA3/4 Forton Extension	C
0794a	0794a/M/01/B1	n/a	Wainhomes	Chris Betteridge, De Pol Assoc.	n/a	n/a	B1

RESPONSES TO THE MAIN MODIFICATIONS							
Table 3 - Full Index of Representations							
Personal ID	Unique Ref	Name	Organisation	Agent	Mod Ref.	Local Plan Ref./SA (D) Ref/Other	Code
0794a	0794a/M/02/C	n/a	Wainhomes	Chris Betteridge, De Pol Assoc.	MM/049	Site Allocations (9.2 Residential Developments)	C
0794a	0794a/M/03/C	n/a	Wainhomes	Chris Betteridge, De Pol Assoc.	MM/058	SA1/9 South Stalmine	C
0794a	0794a/M/04/C	n/a	Wainhomes	Chris Betteridge, De Pol Assoc.	MM/100	Policies Map SA1/9 South Stalmine	C
0794b	0794b/M/01/B1	n/a	Wainhomes	Stephen Harris, Emery Planning	n/a	n/a	B1
0794b	0794b/M/02/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/003	Local Plan Strategy	C
0794b	0794b/M/03/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/004	Strategic Policies (5.1 Introduction)	C
0794b	0794b/M/04/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/005	Policy SP1 Development Strategy	C
0794b	0794b/M/05/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/021	Housing (7.1 Introduction)	C
0794b	0794b/M/06/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/022	Housing (7.2 Housing Land Supply)	C
0794b	0794b/M/07/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/090	LPR1 Wyre Local Plan Review	C
0794b	0794b/M/08/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton	C
0794b	0794b/M/09/C	n/a	Wainhomes	Stephen Harris, Emery Planning	MM/058	SA1/9 South Stalmine	C
0794b	0794b/M/010/D	n/a	Wainhomes	Stephen Harris, Emery Planning	n/a	Section 2	D
0794b	0794b/M/011/GC	n/a	Wainhomes	Stephen Harris, Emery Planning	n/a	n/a	GC
0808	0808/M/01/B1	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	n/a	n/a	B1
0808	0808/M/02/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/001	Introduction (1.1 Introduction)	C
0808	0808/M/03/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0808	0808/M/04/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/003	Local Plan Strategy	C
0808	0808/M/05/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/005	Policy SP1 Development Strategy	C
0808	0808/M/06/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/007	Strategic Policies (5.4 Green Belt)	C
0808	0808/M/07/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	C
0808	0808/M/08/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/021	Housing (7.1 Introduction)	C
0808	0808/M/09/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/022	Housing (7.2 Housing land Supply)	C
0808	0808/M/10/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/023	Policy HP1 Housing Land Supply	C
0808	0808/M/11/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	C
0808	0808/M/12/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/035	Policy HP10 Houses in Multiple Occupation	C
0808	0808/M/13/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/047	Site Allocations	C
0808	0808/M/14/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde	C
0808	0808/M/15/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/089	Monitoring the Local Plan	C
0808	0808/M/16/C	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	MM/090	LPR1 Wyre Local Plan Review	C
0845	0845/M/01/D	Elizabeth Knowles	Natural England	n/a	n/a	Section 4	D
0845	0845/M/02/D	Elizabeth Knowles	Natural England	n/a	n/a	Section 4	D
0845	0845/M/03/GC	Elizabeth Knowles	Natural England	n/a	n/a	n/a	GC
0902	0902/M/01/B1	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Assoc.	n/a	n/a	B1
0902	0902/M/02/C	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Assoc.	MM/005	Policy SP1 Development Strategy	C
0902	0902/M/03/C	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Assoc.	MM/022	Housing (7.2 Housing land Supply)	C
0902	0902/M/04/C	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Assoc.	MM/023	Policy HP1 Housing Land Supply	C
0902	0902/M/05/C	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Assoc.	MM/090	LPR1 Wyre Local Plan Review	C

RESPONSES TO THE MAIN MODIFICATIONS							
Table 3 - Full Index of Representations							
Personal ID	Unique Ref	Name	Organisation	Agent	Mod Ref.	Local Plan Ref./SA (D) Ref/Other	Code
0930	0930/M/01/B1	Robin Buckley	Redrow Homes Ltd	Graham Trehwella, Cass Associates Ltd	n/a	n/a	B1
0930	0930/M/02/C	Robin Buckley	Redrow Homes Ltd	Graham Trehwella, Cass Associates Ltd	MM/002	Introduction (1.4 The Duty to Cooperate)	C
0937	0937/M/01/B1	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	n/a	n/a	B1
0937	0937/M/02/C	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	MM/006	Policy SP2 Sustainable Development	C
0937	0937/M/03/C	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4 Countryside Areas	C
0937	0937/M/04/C	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	C
0937	0937/M/05/C	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	MM/014	Policy CDMP1 Environmental Protection	C
0937	0937/M/06/C	n/a	Bourne Leisure Ltd.	Nathan Matta, Lichfields.	MM/043	Economy (8.9 Holiday Accommodation) and Policy EP9 Holiday Accommodation	C
0941	0941/M/01/C	John Fleming	Gladman Developments Ltd	n/a	MM/006	Policy SP2 Sustainable Development	C
0941	0941/M/02/C	John Fleming	Gladman Developments Ltd	n/a	MM/022	Housing (7.2 Housing land Supply)	C
0941	0941/M/03/C	John Fleming	Gladman Developments Ltd	n/a	MM/090	LPR1 Wyre Local Plan Review	C
0944	0944/M/01/C	n/a	Applethwaite Ltd	Graham Love, Smith and Love Planning Consultants	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde	C
0944	0944/M/02/C	n/a	Applethwaite Ltd	Graham Love, Smith and Love Planning Consultants	MM/003	Local Plan Strategy	C
0944	0944/M/03/C	n/a	Applethwaite Ltd	Graham Love, Smith and Love Planning Consultants	MM/007	Strategic Policies (5.4 Green Belt)	C
0947	0947/M/01/C	J and R Parkinson	n/a	Graham Love, Smith and Love Planning Consultants	MM/066	SA1/17 Land South of Prospect Farm, Garstang	C
0953	0953/M/01/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/003	Local Plan Strategy	C
0953	0953/M/02/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/007	Strategic Policies (5.4 Green Belt)	C
0953	0953/M/03/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/036	Economy (8.2 Employment Land Supply)	C
0953	0953/M/04/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/049	Site Allocations (9.2 Residential Developments)	C
0953	0953/M/05/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/060	SA1/11 - North of Norcross Lane, Norcross	C
0953	0953/M/06/C	n/a	Telereal Trillium	Graham Love, Smith & Love Planning Consultants	MM/101	Policies Map - SA1/11 - North of Norcross Lane, Norcross	C
0962	0962/M/01/B1	n/a	Metacre	Alexis De Pol, De Pol Associates	n/a	n/a	B1
0962	0962/M/02/C	n/a	Metacre	Alexis De Pol, De Pol Associates	MM/062	SA1/13 Inskip Extension	C
0962	0962/M/03/C	n/a	Metacre	Alexis De Pol, De Pol Associates	MM/079	SA3 Mixed Use Development	C
0962	0962/M/04/C	n/a	Metacre	Alexis De Pol, De Pol Associates	MM/082	SA3/3 Land West of Great Eccleston	C
0963	0963/M/01/B1	Paul Smith	Strategic Land Group	n/a	n/a	n/a	B1
0963	0963/M/02/C	Paul Smith	Strategic Land Group	n/a	MM/054	SA1/5 South East Poulton, Poulton-le-Fylde	C
0987	0987/M/01/B1	Elaine Deegan	n/a	John Knight	n/a	SA1/13	B1
0987	0987/M/02/C	Elaine Deegan	n/a	John Knight	MM/003	Local Plan Strategy	C
0987	0987/M/03/C	Elaine Deegan	n/a	John Knight	MM/062	SA1/13 Inskip Extension	C



RESPONSES TO THE MAIN MODIFICATIONS							
Table 3 - Full Index of Representations							
Personal ID	Unique Ref	Name	Organisation	Agent	Mod Ref.	Local Plan Ref./SA (D) Ref/Other	Code
0987	0987/M/04/C	Elaine Deegan	n/a	John Knight	MM/005	Policy SP1 Development Strategy	C
0987	0987/M/05/C	Elaine Deegan	n/a	John Knight	MM/049	Site Allocations (9.2 Residential Developments)	C
0987	0987/M/06/D	Elaine Deegan	n/a	John Knight	n/a	n/a	D
0995	0995/M/01/B1	Paul Desborough	Inskip Residents Action Group	n/a	n/a	SA1/13	B1
0995	0995/M/02/C	Paul Desborough	Inskip Residents Action Group	n/a	MM/062	SA1/13 Inskip Extension	C
0995	0995/M/03/C	Paul Desborough	Inskip Residents Action Group	n/a	MM/049	Site Allocations (9.2 Residential Developments)	C
0995	0995/M/04/C	Paul Desborough	Inskip Residents Action Group	n/a	MM/003	Local Plan Strategy	C
0995	0995/M/05/C	Paul Desborough	Inskip Residents Action Group	n/a	MM/102	Policies Map SA1/13 Inskip Extension	C
0995	0995/M/06/C	Paul Desborough	Inskip Residents Action Group	n/a	MM/005	Policy SP1 Development Strategy	C
1015	1015/M/01/B1	Philip James	n/a	n/a	n/a	n/a	B1
1015	1015/M/02/C	Philip James	n/a	n/a	MM/062	SA1/13 Inskip Extension	C
1055	1055/M/01/GC	Emily Hrycan	Historic England	n/a	n/a	n/a	GC
1055	1055/M/02/D	Emily Hrycan	Historic England	n/a	n/a	n/a	D
1058	1058/M/01/B1	Barbara Sumner	n/a	n/a	n/a	n/a	B1
1058	1058/M/02/C	Barbara Sumner	n/a	n/a	MM/065	SA1/16 West of Cockerham Road, Garstang	C
1059	1059/M/01/B1	Jane Readman	n/a	n/a	n/a	n/a	B1
1059	1059/M/02/C	Jane Readman	n/a	n/a	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde	C
1060	1060/M/01/B1	n/a	Carrick Sports Ltd	Rob Moore, Savills	n/a	n/a	B1
1060	1060/M/02/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/003	Local Plan Strategy	C
1060	1060/M/03/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/004	Strategic Policies (5.1 Introduction)	C
1060	1060/M/04/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/005	Policy SP1 Development Strategy	C
1060	1060/M/05/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/021	Housing (7.1 Introduction)	C
1060	1060/M/06/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/022	Housing (7.2 Housing land Supply)	C
1060	1060/M/07/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/023	Policy HP1 Housing Land Supply	C
1060	1060/M/08/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/048	Site Allocations (9.2 Residential Developments)	C
1060	1060/M/09/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/089	Monitoring the Local Plan	C
1060	1060/M/010/C	n/a	Carrick Sports Ltd	Rob Moore, Savills	MM/090	LPR1 Wyre Local Plan Review	C

WYRE LOCAL PLAN						
STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018						
APPENDIX 3.2						
RESPONSES TO THE MAIN MODIFICATIONS						
TABLE 4 - Summary of Representations on Legal Compliance (B1)						
Unique Ref	Name/Organisation	Legally compliant? Y/N	Mod Ref.	Local Plan Ref.	Legal Compliance - Summary of Representation	Response
0023/M/01/B1	Robert Cooke	n/a	n/a	n/a	There is a conflict between what may be legally compliant and what is not. Wyre has to meet "targets" but face criticism from the Inspector for the siting of some development and the use of agricultural land. He even mentions its character and beauty. There is also argument over the exact number of houses which should be built. Fylde is generally a low-income area yet new-builds being marketed at eye-watering prices. Yet it is not the Council which sets the market price. The Inspector designated the development at Inskip as "disproportionate", but the term could equally be applied to Poulton-le-Fylde and Garstang. The Inspector mentioned the danger of flooding at Inskip. No mention of flooding caused by the development on Garstang Road East, Poulton. The developers all seemed to think there would be no traffic problem wherever they built. I wonder why?	Comments noted but do not impact on the legal compliance of the Local Plan.
0051/M/01/B1	Robert Fail , Wyre Labour Group of Councillors	N	n/a	n/a	Although the modifications may have resulted in some improvements in policy, if the draft local plan is approved it will still exacerbate the area's fundamental problems resulting in a reduced quality of life for residents. As such the modifications have not made the plan itself legally compliant. The comments made by the group on 01.11.17. are therefore still valid and appropriate.	Comments noted but do not impact on the legal compliance of the Local Plan.
0072/M/01/B1	Thornton Action Group	Y	n/a	n/a	No comment.	Noted.
0172/M/01/B1	Ingle's Dawndew Salad	N	n/a	n/a	No comment.	Noted.
0222/M/01/B1	Ric Dumbleton	Y	n/a	n/a	No comment.	Noted.
0358/M/01/B1	Hollins Strategic Land	Y	n/a	n/a	No comment.	Noted.
0363/M/01/B1	Jessica Bond, Taylor Wimpey UK Limited	Y	n/a	n/a	No comment.	Noted.
0398/M/01/B1	Alexis De Pol	Y	n/a	n/a	No comment.	Noted.
0458/M/01/B1	Cabus Parish Council	Y	n/a	n/a	No comment.	Noted.
0473/M/01/B1	Mr P Barnett	Y	n/a	n/a	No comment.	Noted.
0616/M/01/B1	Claughton on Brock Parish Council	Y	n/a	n/a	No comment.	Noted.
0654/M/01/B1	James Procter	N	MM/102	SA1/13	Concerned about the u-turn on the land at Dead Dam bridge as understood originally removed from consideration due to the location of the North West Ethylene pipeline and possible flooding. 70 houses is not a modest allocation. Allocation hinges on an e-mail from the Health and Safety Executive. Confusion about safe distance from the pipeline - Ben Wallace letter states 125m. Concerned that an "advise against" response from the HSE would be overruled - alarming as safety must come first. When purchased our property informed by solicitor of an easement that would prevent development. Have discussions with Essar Oil been undertaken. Space will be required for maintenance. Concerned about the age of the pipeline and possible impact of fracking (ground movement). Understand that there is an additional gas pipe on the land. The Villagers safety is paramount and should come above anything else.	Comments noted but do not impact on the legal compliance of the Local Plan. As indicated by the HSE, the pipeline consultation distances are significantly reduced from those previously understood to be the case hence they have indicated that the "advise against" advice no longer applies. Agents acting on behalf of Essar Oil have confirmed the required easement is 3m each side of the pipeline. There is a high pressure gas pipeline east of the allocated land at Dead Dam Bridge. This does not impact upon the development of the land.
0659/M/01/B1	Inskip-with-Sowerby Parish Council	Y	n/a	n/a	The Parish Council are unaware of any legal non-compliance.	Noted.
0671/M/01/B1	Little Eccleston with Larbreck Parish Council	Y	n/a	n/a	No comment.	Noted.
0766/M/01/B1	AR & A Chippendale Farming Partnership	Y	n/a	n/a	No comment.	Noted.
0774/M/01/B1	Bruce Ramsden	N	n/a	n/a	No comment.	Noted.
0794a/M/01/B1	Wainhomes	Y	n/a	n/a	No comment.	Noted.
0794b/M/01/B1	Wainhomes	Y	n/a	n/a	No comment.	Noted.
0902/M/01/B1	Pipecroft Ltd	Y	n/a	n/a	No comment.	Noted.

STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018						
APPENDIX 3.2						
RESPONSES TO THE MAIN MODIFICATIONS						
TABLE 4 - Summary of Representations on Legal Compliance (B1)						
Unique Ref	Name/Organisation	Legally compliant? Y/N	Mod Ref.	Local Plan Ref.	Legal Compliance - Summary of Representation	Response
0930/M/01/B1	Redrow Homes Ltd	Y	n/a	n/a	No comment.	Noted.
0937/M/01/B1	Bourne Leisure Ltd.	Y	n/a	n/a	No comment.	Noted.
0962/M/01/B1	Metacre	Y	n/a	n/a	No comment.	Noted.
0963/M/01/B1	Strategic Land Group	Y	n/a	n/a	No comment.	Noted.
0987/M/01/B1	John Knight	N	n/a	SA1/13	<p>A. The Planning and Compulsory Purchase Act 2004 at Sections 19 and 20 of the Act set out those matters which the Local Plan must have regard to. These include three matters of particular concern to Inskip which are:</p> <ol style="list-style-type: none"> <li>1. National policies and advice contained in guidance issued by the Secretary of State (this would include the NPPF and National Planning Practice Guidance notes particularly regarding the need for sustainable development to be demonstrated for appropriate locations for new housing development as well as assessment of the quality and capacity of infrastructure)</li> <li>2. Any other local development document which has been adopted by the authority (this would include an out of date Statement of Community Involvement and other related policies set out in the existing Borough Local Plan for example);</li> <li>3. The resources likely to be available for implementing the proposals in the document (this would include the our previous concerns about the lack of sustainability for further development of 70 dwellings in Inskip.</li> </ol> <p>B. Localism Act - The failure to co-operate (under the Localism Act) between Wyre Council and the Fylde area authorities over a number of cross-boundary matters has been a constant area of concern. In respect of housing land supply, the matter remains unresolved. The location of Inskip is critical in this regard in that it relates more closely to villages and other settlements within Fylde Council area rather than Wyre. The area around Inskip is effectively a peninsular within the wider Fylde area. The lack of cross-boundary co-operation especially about housing land supply has in our view not supported any objective views about the future housing needs of this area.</p> <p>C. Environmental legislation - In terms of environmental legislation the supporting documents in respect of compliance with national and European legislation were published by the Borough Council. It is concluded that the Environmental reports were at such a high level of strategy that the impact on the village of Inskip could not be disaggregated and assessed. An objection to the Wyre Local Plan can be lodged on these grounds based on previous evidence brought by the Inskip community.</p> <p>Legal compliance can be achieved by accepting our suggested amendments to the proposed Main Modifications.</p>	Although the Inspector has yet to publish his final report in his Post Hearing Advice, his comment with regard to legal compliance, procedural requirements and the Duty to Co-operate is limited to a matter relating to the Sustainability Appraisal. The Inspector has raised no other matter in relation to these aspects of the local plan process. The representation submitted does not highlight any matters materially different from those already expressed in response to the Publication Draft Local Plan.
0995/M/001/B1	Paul Desborough, IRAG	N	n/a	SA1/13	Dead Dam Bridge site (INS_07) originally rejected owing to presence of the North West Ethylene Pipeline. Inskip Vision with plans for the site rejected by the council. No further consultation with the local community has taken place. No regard to the advice of the NPPF to early and meaningful engagement. Therefore modifications MM/062, MM/102, MM/003, MM/005 and MM/049 relating to allocation SA1/13 are legally non-compliant and premature.	The allocation of land at Dead Dam Bridge has been made as a result of a request by the Local Plan Inspector to consider whether the land should be identified as part of the wider allocation. This the council have done. The Modifications process allows for public comment to be made on this and the other Main Modifications. The Inspector will consider representations received and the council's response. He will then act accordingly. The council have acted in a legally compliant manner throughout the local plan process.
1015/M/01/B1	Philip James	Y	n/a	n/a	Legally compliant as far as is aware.	Noted.
1058/M/01/B1	Barbara Sumner	Y	n/a	n/a	No comment.	Noted.
1059/M/01/B1	Jane Readman	N	n/a	n/a	The only objection being the number of proposed houses would be unsustainable.	Noted.
1060/M/01/B1	Carrick Sports	Y	n/a	n/a	No comment.	Noted.

WYRE LOCAL PLAN								
STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018								
APPENDIX 3.2								
RESPONSES TO THE MAIN MODIFICATIONS								
Table 5a- Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Unique Reference Order)								
Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0032/M/01/C	Blackpool Council	MM/002	Introduction (1.4 The Duty to Cooperate)	Para. 1.45 Para. 1.47	N	<p>The modified text set out in MM/002 gives the impression that a plan review may be secondary to a further request for assistance from neighbouring authorities. New paragraph 1.4.5 in MM/002 states that "A duty to cooperate meeting was held on 14 November 2017 with all adjoining authorities. It was agreed that adjoining local authorities will consider if and how they can assist Wyre with the housing shortfall once the quantum of the shortfall has been agreed through the Wyre Local Plan examination." This is not a position that Blackpool agreed to at this meeting. At the meeting it was agreed that the issue of Wyre's OAN and any shortfall would be addressed through the examination process and that Blackpool (and Fylde) would put their views forward as such. We do not consider the OAN figure of 479 to be justified and dispute some of the assumptions made that restricted housing capacity over the plan period.</p> <p>We do not consider new paragraph 1.4.7 in MM/002 is needed because amended paragraph 1.4.5 (beginning "The Duty to Cooperate Statement sets out...") summarises the situation with regard to the Duty to Cooperate. In addition, as set out in our representations to the Publication Draft Local Plan (paragraphs 2.5 – 2.9) we had some concerns about the timing of the provision of evidence to support Wyre's approach, which is not reflected in the text in new paragraph 1.4.7.</p> <p>Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.</p>	<p>The primary focus in both MM/002 and MM/003 should be on the review mechanism. We suggest that new paragraph 1.4.5 in MM/002 is deleted.</p> <p>Acknowledge that a review of local housing need may be required to reflect this change to national policy.</p>	<p>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 OAN housing figure. He refers to the figure of 479 as the OAN. The Inspector has considered the arguments advanced by Blackpool. The comments on the OAN do not relate to a MM. Adjoining local authorities are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks.</p> <p>Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other duty to cooperate actions. Wyre maintains that paragraph 1.4.5 reflects what was discussed at the 14 November 2017. Following months of disagreement about the OAN and the 'shortfall' it was agreed that these are matters for the Wyre Local Plan examination.</p> <p>Paragraph 1.4.5 is correct and reflects the statement in the recently adopted Fylde Local Plan at paragraph 1.27- "Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development."</p> <p>New paragraph 1.4.7 is appropriate and refers to the Wyre's efforts under the Duty to Co-operate with regards to the housing shortfall. The detail of these efforts is more appropriately covered in the Statement of Compliance with the Duty to Co-operate.</p> <p>It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.</p>
0032/M/02/C	Blackpool Council	MM/003	Local Plan Strategy		N	<p>The modified text set out in MM/003 gives the impression that a plan review may be secondary to a further request for assistance from neighbouring authorities. Amended paragraph 4.1.21 of MM/003 which before making any reference to the partial review mechanism states that "The Council is committed to on-going engagement with adjoining local authorities with regards to meeting the shortfall outside Wyre in adjoining local authorities. This is a matter of consideration for the Local Plans of adjoining local authorities". This text is not required.</p> <p>MM/003 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.</p> <p>Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.</p>	<p>The primary focus in MM/003 should be on the review mechanism. Delete suggested additional text to para. 4.1.21 beginning "The council is committed.....".</p> <p>Delete reference to meeting 97% of the OAN.</p> <p>Acknowledge that a review of local housing need may be required to reflect this change to national policy.</p>	<p>Adjoining LAs are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks.</p> <p>Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other duty to cooperate actions.</p> <p>Wyre is required to engage with adjoining local authorities regarding the shortfall through the Duty to Co-operate requirements. The inserted text in paragraph 4.1.21 is correct and appropriate. The review is referred to in new paragraph 4.1.22.</p> <p>The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan.</p> <p>Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.</p> <p>MM /003 relates to the Local Plan Strategy and therefore a focus on the review is not appropriate.</p> <p>It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.</p>
0032/M/03/C	Blackpool Council	MM/004	Strategic Policies (5.1 Introduction)		N	<p>MM/004 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.</p>	<p>Delete reference to meeting 97% of the OAN.</p>	<p>The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan.</p> <p>Reference to meeting 97% of the OAN is factually correct.</p> <p>Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.</p>
0032/M/04/C	Blackpool Council	MM/021	Housing 7.1 Introduction		N	<p>MM/021 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.</p>	<p>Delete reference to meeting 97% of the OAN.</p>	<p>The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan.</p> <p>Reference to meeting 97% of the OAN is factually correct.</p> <p>Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.</p>

## STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018

## APPENDIX 3.2

## RESPONSES TO THE MAIN MODIFICATIONS

Table 5a- Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Unique Reference Order)

Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0032/M/05/C	Blackpool Council	MM/048	Site Allocations (9.2 Residential Developments)		N	MM/048 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.	Delete reference to meeting 97% of the OAN.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.
0032/M/06/C	Blackpool Council	MM/089	Monitoring the Local Plan		N	MM/089 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.  Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.	Delete reference to meeting 97% of the OAN.  Acknowledge that a review of local housing need may be required to reflect this change to national policy.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.  It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.
0032/M/07/C	Blackpool Council	MM/090	LPR1 Wyre Local Plan Review		N	If there is no shortfall in the OAN, this would bring into question the need to for a partial review of the plan as set out in MM/090 (and referred to in MM/002, MM/003 and MM/089).  Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.	Acknowledge that a review of local housing need may be required to reflect this change to national policy.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. This position is aligned with the Inspector's position that a shortfall exists and that an immediate partial review is necessary. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0051/M/02/C	Robert Fail, Wyre Labour Group of Councillors	MM/003	Local Plan Strategy	Para. 4.1.11	N	The modification to para 4.1.11. suggests that the necessary infrastructure for the scale of housebuilding proposed is being provided but this is not the reality of the situation. The A585 and other roads in Fleetwood and Thornton Cleveleys will be severely impacted by the plan and the proposed Mains Lane bypass and future junction alterations at Norcross and Cleveleys will do nothing to address the issue.. The employment, commute and congestion issues are not being addressed, they will make the problems worse and this will deter new employers. The plan does not provide the employment for the projected population increase.	Altering para 4.1.11. will have little effect. A major modification is required based on a fundamental change of strategy to deliver a transport infrastructure and economic growth to Wyre as a prelude to housing.	The matters raised against MM/003 are not new matters and have been considered as part of the examination process previously. The Council is committed to an immediate partial review of the Local Plan which will include a review of transport and highway issues.
0051/M/03/C	Robert Fail, Wyre Labour Group of Councillors	MM/006	Policy SP2 Sustainable Development		N	The IPCC report shows unprecedented changes are needed to limit global warming. The modification does not sufficiently reflect the seriousness of the impact of climate change.	It is unclear what the design requirements would be, therefore the requirements need to be more prescriptive.	The comment is general and does not relate to the changes made in MM/006
0051/M/04/C	Robert Fail, Wyre Labour Group of Councillors	MM/013	Policy SP8 Health and Well-Being		Y	The housing allocations are not consistent with this policy. The transport infrastructure will not support the level of development proposed. Development of housing allocations in Thornton Cleveleys and Poulton will increase congestion and result in a deterioration in air quality on local roads. The health and well being of residents in the area is not being considered.	The wording is not unreasonable but the housing allocations in Thornton Cleveleys contravene the policy and should be reconsidered.	The comment is general and do not relate to the change made by MM/013.
0051/M/05/C	Robert Fail, Wyre Labour Group of Councillors	MM/014	Policy CDMP1 Environmental Protection		Y	The housing allocations are not consistent with this policy. The transport infrastructure will not support the level of development proposed. Development of housing allocations in Thornton Cleveleys and Poulton will increase congestion and result in a deterioration in air quality on local roads. The health and well being of residents in the area is not being considered.	The wording is not unreasonable but the housing allocations in Thornton Cleveleys contravene the policy and should be reconsidered.	The comment is general and do not relate to the change made by MM/013.
0051/M/06/C	Robert Fail, Wyre Labour Group of Councillors	MM/024	Housing (7.3 Housing Mix)		N	The Plan recognises a shortage of smaller properties in Wyre but despite the evidence published in the SHMA new developments don't reflect the needs of the community.	To inform future policy changes the supply and demand of each housing type needs to be monitored and the policy adjusted where required.	The comment is general and do not relate to the change made by MM/013.
0072/M/02/C	Thornton Action Group	MM/099	Policies Map SA1/2 Lambs Road/Raikes Road, Thornton		N	Thornton Action Group fully supports the classification of the land between Raikes Road and the Wyre Estuary as Green Infrastructure with the added protection that this gives against development but urge that the area to the south and east of Stanah School which is subject to a covenant be also classed as Green Infrastructure. The Covenant refers to keeping this land for recreational use.	Designate additional land at Stanah as Green as Green Infrastructure.	Support for the designation of countryside as GI at Stanah is noted. The designation of the covenanted land is not subject to a MM and therefore outside the scope of this consultation.

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Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0072/M/03/C	Thornton Action Group	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton		N	Why retain the proposal for a new road between Slicock's Corner and Raikes Road as a possibility? This indicates the existing roads will not be able to cope with the additional traffic created by the 360 houses and a primary school on SA 1/2. Also, increased traffic along these roads which will result from the 400 houses to be built in North Thornton. This new link is in the wrong place and would not alleviate the problems on Lamb's Road/ Skippool Road. This matter needs to be urgently reconsidered.	See summary of representation.	The requirement for a link road has been a necessity of the allocation since Publication Deposit stage. The examination and hearings have given opportunity for this matter to be considered. The modification clarifies that this requirement remains unless satisfactorily demonstrated otherwise. The rationale for the link road is set out in the council's response to Matter 8 document library reference EL3.008a. The MM provides flexibility in the Local Plan.
0172/M/02/C	Ingle's Dawndew Salad	MM/022	Housing (7.2 Housing Land Supply)		N	Considers that the Sedgfield method is the most appropriate method of making up the shortfall in housing delivery.	Allocate land at Ingle's Dawndew Salad for residential development as proposed at Publication Draft stage.	The merits of the Liverpool vs Sedgfield approach was debated during the hearings and the Inspector has reached his conclusions having also considered all other relevant evidence. The reference to the land at Ingle's Dawndew Salad is not a new comment but relates to an omission site put forward at Publication stage.
0222/M/02/C	Ric Dumbleton	n/a	n/a		Y	No comment.	n/a	Noted.
0290/M/01/C	Fylde Council	MM/002	Introduction (1.4 The Duty to Cooperate)	Para 1.4.5 Para. 1.4.6 Para. 1.4.7	N	Paragraphs 1.4.5 to 1.4.8 as proposed for modification give the clear impression that the review would be secondary to a (further) request for assistance in meeting unmet housing need outside Wyre. This is not justified.  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.	Paragraph 1.4.5 should be deleted. The wording to paragraph 1.4.7 should remove the first part of the sentence: "Although...provided for," and should begin with "The Duty to Cooperate Statement..." The last two sentences of that paragraph should be removed altogether. Paragraph 1.4.8 should be revised to read "...which brought the housing land supply closer to the identified housing OAHN within the OAHN range indicated by the evidence. However due to the outstanding shortfall deficiency and the existing position that no adjoining authority is able to assist Wyre in meeting unmet needs, the Local Plan includes a review mechanism..." This last sentence only need remain at all if the Inspector still considers that the OAHN is not met.	Adjoining LAs are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks. Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other Duty to Co-operate actions. The amendments made under MM/003 do not give the impression that the commitment for immediate partial review is secondary to another action. Therefore the amendments introduced in MM/003 remain appropriate. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0290/M/02/C	Fylde Council	MM/003	Local Plan Strategy		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.  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.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%. The need for the local plan review to accord with the new standard methodology should be acknowledged within the modifications.	The 'shortfall' is determined by considering the housing figure against the OAHN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0290/M/03/C	Fylde Council	MM/004	Strategic Policies (5.1 Introduction)		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach.
0290/M/04/C	Fylde Council	MM/021	Housing 7.1 Introduction		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach.

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0290/M/05/C	Fylde Council	MM/048	Site Allocations (9.2 Residential Developments)		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach.
0290/M/06/C	Fylde Council	MM/089	Monitoring the Local Plan		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.  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.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0290/M/07/C	Fylde Council	MM/090	LPR1 Wyre Local Plan Review		N	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 the review to accord with the new standard methodology should be acknowledged within the modifications.	It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0297/M/01/C	Home Builders Federation	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to insert new paragraphs in relation to the Duty to Cooperate, the OAN and the Local Plan Review adds clarity and is beneficial.	n/a	Noted.
0297/M/02/C	Home Builders Federation	MM/003	Local Plan Strategy	Para. 4.1.21	Y	Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to paragraph 4.1.21 in relation to a commitment to ongoing engagement is valuable. The commitment to an early review and therefore the modification to paragraph 4.1.21 is also supported.	n/a	Noted.
0297/M/03/C	Home Builders Federation	MM/004	Strategic Policies (5.1 Introduction)		Y	The HBF are supportive of the proposed amendment and the increase in the proportion of provision of the housing OAN.	n/a	Noted.
0297/M/04/C	Home Builders Federation	MM/005	Policy SP1 Development Strategy		Y	The HBF are generally supportive of the proposed modification to Policy SP1, point 3, including the addition of 'a minimum' and the increase in the housing requirement.	n/a	Noted.
0297/M/05/C	Home Builders Federation	MM/022	Housing (7.2 Housing Land Supply)	Para. 7.2.5 Para. 7.2.6 Para. 7.2.7	N	Concerns in relation to a windfall allowance, as set out previously. However, the need to avoid double counting is supported. <b>Paragraph 7.2.5</b> states that the most appropriate way to deal with any shortfall since 1 April 2011 is for the shortfall to be met over the remainder of the Local Plan period. Consider that it is preferable to address any shortfall in delivery as soon as possible and preferably using the Sedgfield method, and that the Council should be actively working with homebuilders to deliver homes and reduce the shortfall. Agree with the addition of test to <b>paragraph 7.2.6</b> to states that the figure in Policy HP1 is expressed as a minimum and there is no planning barrier to the early delivery of sites if circumstances and market conditions allow. Do not consider it is necessary to add the additional line at the end of paragraph 7.2.6 stating that the Sedgfield approach is not realistic, and it would lead to the Plan becoming out of date after adoption. It is considered that the final sentence is not effective as it adds little to the plan, and that it does not support a positively prepared plan as the issue identified could be resolved through the proactivity of the Council and housebuilders. New <b>paragraph 7.2.7</b> - whilst it is considered that based on previous definitions of persistent under-delivery the 20% buffer would be appropriate it is noted that going forward this plan will be used in decision making alongside the 2018 NPPF. The 2018 NPPF provides details as to what buffer should be applied and in what circumstances. It is therefore queried if the addition of this paragraph is necessary or appropriate.	See summary of representation.	The merits of the Liverpool vs Sedgfield approach was debated during the hearings and the Inspector has reached his conclusions having also considered all other relevant evidence. The support to the amendments to paragraph 7.2.6 is noted. The last sentence in paragraph 7.2.6 is the conclusion reached by the Inspector (paragraph 21 in his Post Hearing Advice) and provides justification for the use of the 'Liverpool' approach. The sentence does not have any bearing on whether the Local Plan is positively prepared or not. The Local Plan is examined against the 2012 NPPF but as stated in paragraph 7.2.7 the position with regards to the buffer may change. The paragraph is considered appropriate.

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Table 5a- Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Unique Reference Order)

Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0297/M/06/C	Home Builders Federation	MM/023	Policy HP1 Housing Land Supply		Y	The HBF is supportive of the addition of 'a minimum', the addition of 'at least' and the increase in the housing requirement, within point 1 of Policy HP1. The HBF also supports the deletion of point 2 of the policy.	n/a	Noted.
0297/M/07/C	Home Builders Federation	MM/024	Housing (7.3 Housing Mix)		Y	The HBF supports the recognition within the text that the policy does not seek to impose any specific Building Regulation 'optional standards' but that it provides a flexible framework.	n/a	Noted.
0297/M/08/C	Home Builders Federation	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	Para. 7.4.2 HP3	Y	The amendment to paragraph 7.4.2 and to Policy HP3 to increase the threshold to 11 or more dwellings is supported.	n/a	Noted.
0297/M/09/C	Home Builders Federation	MM/034	Policy HP9 Green Infrastructure in New Residential Developments		Y	The amendment to Policy HP9 to increase the threshold to 11 or more dwellings is supported.	n/a	Noted.
0297/M/10/C	Home Builders Federation	MM/089	Monitoring the local plan		Y	The HBF is generally supportive of the proposed modifications particularly reference to the Housing Implementation Strategy and the Local Plan Review.	n/a	Noted.
0297/M/11/C	Home Builders Federation	MM/090	LPR1 Wyre Local Plan Review		Y	The HBF are supportive of the identification of the need to review the plan and the identification of clear timescales for that to happen.	n/a	Noted.
0297/M/12/C	Home Builders Federation	MM/091	Monitoring the local plan	Table 10.1	Y	The HBF generally supports the proposed modifications to the monitoring framework, and consider that this will help to ensure that monitoring is more effective.	n/a	Noted.
0343/M/01/C	Highways England	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	Highways England is supportive of the Inspector's suggestion that the new Local Plan be subject to early review. Highways England wishes to be involved with this process, and will be happy to assist the Council through the provision of knowledge and existing modelling information relating to the bypass scheme and the operation of the wider strategic road network within the area likely to be affected by the Local Plan.	None.	Noted.
0343/M/02/C	Highways England	MM/003	Local Plan Strategy		Y	We note that the planned housing and employment growth levels and distribution to be delivered during the Plan period is observed to be significant (equating to an increase of 1061 residential units, which equates to a rise of 11%). However, this increase is observed to be reasonable in the context of the requirement for the Council to increase its OAHN target for the plan period.	None.	Noted.
0343/M/03/C	Highways England	MM/005	Policy SP1 Development Strategy		Y	A noteworthy observation is the reduction of 305 dwellings dispersed throughout the small rural settlements which is offset by a larger increase in the Urban Towns (146) and in Garstang itself (196 dwellings). The increase in Garstang is itself substantial due to existing issues associated with the cumulative level of proposed growth along the A6 corridor and the overall impact on the SRN itself (M6 Junction 33 and/or M55 Junction 1). Although the A585 provides accessibility to the Urban Towns where an increase in both housing and employment has been proposed, the relatively small scale of development is unlikely to significantly impact the operation of the SRN due to the expectation of trips also being dispersed throughout the local road network.	None.	Noted.
0343/M/04/C	Highways England	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para. 5.7.3	Y	The inclusion of amended wording in para. 5.7.3 is welcomed and, although vague regarding the specification of what would constitute such circumstances, the proposed amendment would enable development where impact assessment indicate a severe impact to be challenged appropriately in line with policy set out within the Local Plan.	None.	Noted.
0343/M/05/C	Highways England	MM/036	Economy (8.2 Employment Land Supply)		Y	The loss of 2ha of employment land, in which the development use class is not specified, is not observed to be of material significance to Highways England.	None.	Noted.
0343/M/06/C	Highways England	MM/037	Policy EP1 Employment Land Supply		Y	The reduction of employment land by 1.58 in the rural areas is not projected to have a noticeable impact on either the Local or Strategic Road Networks.	None.	Noted.



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0358/M/02/C	Hollins Strategic Land	MM/022	Housing (7.2 Housing Land Supply)	N	<p>Windfall allowance - although EL5.012 provides evidence which demonstrates significant housing completions on non-allocated sites permissions will have been granted on the basis of the NPPF tilted balance as the Council did not have an up to date plan or a 5-year HLS for a number of years. Once adopted, the eLP will have allocated as much land for housing as is possible without there being a severe impact on the highway network. It is therefore considered likely that LCC Highways will object to the windfall schemes during the application processes. The Council must demonstrate whether this is likely, by obtaining a response on the matter from LCC Highways.</p> <p>Five year supply - will be reduced as a result of concerns regarding the windfall supply and the requirement for masterplanning. Plan period housing land supply - masterplanning process will have a knock-on effect moving some delivery beyond the Plan period, further reducing the ability of the council to deliver its housing needs.</p>	Windfall - the windfall allowance should be removed or significantly reduced, at least to 25. This would result in the HLS for the plan period falling and the 5-year supply becoming even more fragile. Masterplanning - remove the masterplanning requirement or reduce the masterplanning guidance requirements.	<p>The Inspector having considered the evidence submitted pre and during the hearings including highway evidence has concluded that a windfall allowance for sites of less than 25 dwellings can be made. As indicated by the representor, allocations such as SA3/4, may deliver a higher figure than the minimum in the allocation policies.</p> <p>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 guidance follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements in the guidance is commensurate with submitting an outline planning application. For a person with the right experience in preparing a masterplan it is not a complicated process. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing.</p>
0358/M/03/C	Hollins Strategic Land	MM/047	Site Allocations	N	The council's requirement for a masterplan and the requirements of it's published guidance on the preparation of masterplans will act as a barrier to delivery. Masterplan for SA3/4 submitted.	Amend SA3/4 to allow for the submitted masterplan to be sufficient.	<p>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.</p> <p>The guidance follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements in the guidance is commensurate with submitting an outline planning application. For a person with the right experience in preparing a masterplan it is not a complicated process. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing. The masterplan process and is not a barrier to development and the guidance has been helpful elsewhere in the Borough.</p> <p>Whether the submitted document is an acceptable masterplan is not a matter for the Local Plan process and specifically the consultation on the proposed MMs.</p>
0358/M/04/C	Hollins Strategic Land	MM/083	SA3/4 Forton Extension	N	<p><b>Site area</b> - this should be extended to include land south of Sunnybank Nurseries for employment use as opposed to the location suggested by the council. Reasons include it would adjoin an existing employment use and cafe, there is limited employment use at Jesmond Dean (the area of the council's preferred location), the employment parcel can come forward independently of the rest of the allocation, land at the council's preferred location is required to manage drainage, employment in the council's preferred location will not deliver an attractive gateway, the council's preferred location would require residential development to be accessed through an employment site, parcel E provides greater flexibility in terms of suitable employment uses, parcel E to the south has the advantage of a lack of conflict with adjoining land uses and parcel is will be accessible to the neighbourhood centre.</p> <p><b>Use</b> - this should reflect the uses required by the Key Development Considerations (KDCs).</p> <p><b>Housing capacity</b> - the attached masterplan demonstrates delivery of circa 363 dwellings. This should be reflected in the site capacity (as a minimum figure).</p> <p><b>Site delivery</b> - the council should acknowledge that the requirements of the masterplanning process will delay delivery. The council should confirm where each of the required uses should be located, including the location of employment within land to the south of Forton.</p> <p><b>Site description</b> - the individual land parcels should be individually designated (A, B C etc)</p> <p><b>KDC1</b> - The masterplan requirement should be removed or the requirements of the council's guidance should be reduced. The requirement to avoid ransom strips should be rolled out across all other allocations.</p> <p><i>(continued on the next line)</i></p>	See summary.	<p><b>Site area</b> - the Council considers that the greater benefit arises from locating the employment element close the main area of housing growth, close to facilities in the new neighbourhood centre (which it will support and is likely to be significantly closer to than parcel E) and close to the A6, whilst maintaining the full integrity of the Strategic Area of Separation between Forton and Hollins Lane south of Sunnybank Nurseries. The council considers that there is no justification for assuming that employment and residential uses cannot be located in proximity to each other off School Lane nor that the relationship between the uses, including access points, cannot be appropriately designed, nor that the development of employment uses in the council's suggested location will hinder the delivery of the allocation, or will employment be restricted in terms of end use. The matter raised regarding drainage is one of detail. The council has no access to the technical information behind the masterplan and as such is unable to provide any necessary challenge. Although the submission appears to suggest that the landowner supports the use of this land for employment use, no evidence has been supplied to support this position and the submission made on behalf of that owner to this Modifications consultation (0785/M/01/C) does not make any such support clear. The council has considered the arguments put forward in the attached "masterplan" in favour of allocating the land to the south for employment, but finds no compelling reasons for amending the allocation as proposed to be modified that override the sustainable benefits of locating the employment use at the Village.</p> <p><b>Use</b> - 'Use' is not the subject of an MM. Site SA3/4 is correctly allocated for mixed employment and residential uses. Other uses required in the KDCs are ancillary.</p> <p><b>Housing capacity</b> - capacity is a minimum figure. A higher figure that is considered acceptable through the masterplan and planning application stages could be delivered.</p> <p><i>(continued on the next line)</i></p>

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					<p><b>KDC3</b> - the need for a landscape buffer along the A6 stems from concerns relating to the original allocation boundary which has been amended by the Inspector. A buffer will reduce the developable area on the remaining land and is no longer necessary.</p> <p><b>KDC4</b> - the need for a drainage strategy across the whole allocation is an unnecessary cost, will lead to further delay and is not justified based on information gained as a result of developing the attached masterplan. The need to drain into Morecambe Bay is not supported by evidence, is not justified and should be removed.</p> <p><b>KDC5</b> - the requirement for the employment element of the allocation to be located at Forton Village has not been subject to a masterplanning process. Land to the south should be allocated instead as set out in the attached masterplan.</p> <p><b>KDC6</b> - if the council can confirm the location of the employment land it should confirm the location of the school extension land. The education authority should justify the land take required. The seeming need to provide the education provision in advance of development threatens the delivery of the allocation. Land to the north of the village could be allocated to accommodate the additional education provision and would mean a link road through parcel B would not be required. A similar approach has been taken in Stalmine. Alternatively this land could be allocated for residential development.</p> <p><b>KDC7</b> - The location of the neighbourhood centre should be specified within the allocation.</p> <p><b>KDC8</b> - This should be made clearer that any development of the recreation ground should lead to no net loss of public open space.</p> <p><i>(continued on next line)</i></p>	See summary	<p>The following matters raised by the representor are not matters covered in an MM but new matters which should have been raised at publication stage: -</p> <p>The request for the naming of individual parcels (Site Description);</p> <p>Removal of Masterplan requirement (KDC1)</p> <p>The representor's requirement for Policy SA3/4 to be prescriptive as to the location of the ancillary uses (KDC6).</p> <p>The content of the Council's Guidance on the preparation of masterplans is not a matter of the Local Plan examination.</p> <p><b>KDC1</b> - the MM regarding ransom strips was considered necessary following discussions during the hearing sessions and the matter being raised as of particular concern that could affect delivery. Policy CDMP3 criterion f) seeks to prevent ransom strips in general and would apply in relation to the preparation of masterplans consideration of planning applications. <b>The Council does not consider it necessary that the particular requirement is replicated on all allocation policies but would not object if the Inspector considers it appropriate.</b></p> <p><b>KDC3</b> - the need for a landscape buffer along the A6 stems from the discussion at the hearing sessions and it is referred to in 'Working list of modifications from Local Plan hearings week 2' (EL5.029). As stated it was agreed at the hearing sessions to revise the wording submitted to the examination (EL5.028) to be expanded to also cover the provision of green infrastructure/buffer along the A6. The buffer is unrelated to the deleted parcel of land and it is still necessary to protect the amenities of future residents with regards to noise and pollution. It is also necessary to lessen the visual impact along the A6.</p> <p><i>(continued on next line)</i></p>	
					<p><b>KDC10</b> - given the fact that the gas pipeline will have no effect on the development, the need to refer to the Health and Safety Consultation Zones is no longer necessary.</p> <p><b>KDC11</b> - seems to infer that only one planning application will be submitted. It should be amended to allow for multiple applications. It is also not necessary to refer to Minerals Safeguarding Areas or Source Protection Zone 3 as the site will be allocated for development.</p>	See summary	<p><b>KDC4</b> - The need for a drainage strategy across the whole allocation was raised by United Utilities (Submissions EL1.009a&amp;b) and a proposed amendment requiring a drainage strategy was submitted at the hearing (EL5.026) and the Council maintain that a drainage strategy for the allocation is necessary to avoid future flooding incidences. The Representor does not explain why a drainage strategy is not justified and does not confirm that consultation with United Utilities on their suggested approach was undertaken. The requirement for the development to drain into Morecambe Bay is a clarification as to the destination of 'existing water courses' previously referred to in KDC4. The updated IDP in Appendix 3 show that existing watercourses in the locality drain into Morecambe Bay via the River Cocker. In essence this is not a new requirement.</p> <p><b>KDC5</b> - the requirement for the location of the employment element at Forton Village stems from the council's response to the Inspector's Post Hearing Advice.</p> <p><b>KDC6</b> - the approach to school provision at Stalmine is different because the existing school cannot expand due to an existing planning permission for development up to its boundary. The allocation internal road system is a matter for the masterplan. Suggested additional land has not been considered through the examination process and is not the subject of a MM.</p> <p><b>KDC8</b> - on the Policies Map the recreational ground is shown as existing GI. Therefore any loss will need to be replaced in accordance with Policy CDMP4.</p> <p><b>KDC10</b> - is still relevant to the allocation as the pipeline remains and as such any advice from the HSE should be taken into account in the development of the allocation.</p> <p><b>KDC11</b> - it is accepted that there is a typing error in KDC11 which should read '...and planning application(s)'. The allocation does not negate the need to take into account the fact that the land lies within a mineral safeguarding area and a Source Protection Zone 3 of abstraction boreholes in preparing the masterplan and any subsequent planning application.</p>	
0358/M/05/C	Hollins Strategic Land	MM/090	LPR1 Wyre Local Plan Review	N	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. If, as the highway authority expects, the review finds housing cannot be accommodated on the highway network, Fylde will need to review their plan with consequent delay in delivery. Option 1 put forward by the Inspector would mean unmet need being delivered quicker and would represent a positive planning solution.	n/a	It is accepted in case law that a local plan can be found sound taking into account an immediate partial review. [Grand Union Investment Ltd v Dacorum BC (2014)]. In any event whether the Council reviews or suspends the Plan is a matter for the Council to decide and it is not part of the consultation on MMs. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness.	

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0363/M/02/C	Jessica Bond, Taylor Wimpey UK Limited	MM/002	Introduction (1.4 The Duty to Cooperate)		N	<p>Whilst the Council's evidence base seeks to demonstrate that it has effectively cooperated with adjoining authorities, TW disagrees with this assertion and has concerns over the effectiveness of the cooperation during the early stages of plan preparation. This limited engagement with neighbouring authorities has not enabled Wyre to meet its unmet need within the housing market areas [HMA]. Notwithstanding, TW acknowledges the Inspector's decision and is generally supportive of building an early review mechanism into the Local Plan to enable the Council to meet its unmet need provided it is carried out at the appropriate time. TW has concerns that commencing the partial review so soon after the adoption of the Local Plan is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the Local Plan and forecasts a realistic timetable for the preparation of a review. Furthermore, in preparing the review of the Local Plan, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy.</p> <p>Overall, TW has some concerns regarding the effectiveness of MM/002 on the premise that the Council has failed to cooperate effectively with adjoining authorities. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the current Local Plan which has been time expired since 2006.</p>	A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review too soon after the adoption of the Local Plan; Additional text should be provided with MM/002 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.	The Council's compliance with the Duty to Co-operate 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 review 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 LAs with regards to the shortfall of unmet need. The scope of the review is set out in new Policy LPR1. The DtC will apply to the review of the Local Plan.
0363/M/03/C	Jessica Bond, Taylor Wimpey UK Limited	MM/004	Strategic Policies (5.1 Introduction)		N	<p>Supports the measures that have been incorporated in the plan by virtue of the MM to enable the Council to meet the majority of its housing OAN, it has concerns regarding the remaining unmet need. As set out in the response to MM/002, TW supports the Inspector's recommendation to build in an early review mechanism, to enable it to meet its unmet need. TW strongly recommends that additional text is included within MM/004, which set out that the Council will commit to an early review to ensure that it able to meet its unmet need. As part of the review, the Council will seek to engage with authorities in the HMA and will carry out a robust and effective duty to cooperate to ensure it is able to meet its unmet need. The Local Plan has not been positively prepared, because it does not seek to meet the full housing OAN. 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.</p>	Additional text should be input into MM/004 which sets out that the Council will commit to an early review, and that it will seek early engagement opportunities with the HMA through a robust and effective duty to cooperate to ensure it is able to meet its unmet need.	The Council's commitment to an immediate review is set out in policy terms (Policy LPR1). There is no need for any further text. The review will need to comply with DtC requirements. Comments regarding the Council's compliance with the DtC are not relevant to the MMs. The Council's compliance with the DtC was considered at the hearing sessions and the Inspector has not raised any issues.
0363/M/04/C	Jessica Bond, Taylor Wimpey UK Limited	MM/020	Policy CDMP6 Accessibility and Transport	Part 2	Y	Support amendment to Part 2 to include reference to; 'where practical' developments should make appropriate provision for EVC charging points. Support the degree of flexibility that this MM proposes for Part 2 of the Policy. The proposed MM ensures that a sufficient degree of flexibility can be exercised by the applicant and decision taker when considering whether the provision of EVC points are necessary in the context of a development.	None	Noted.
0363/M/05/C	Jessica Bond, Taylor Wimpey UK Limited	MM/021	Housing 7.1 Introduction		N	<p>TW acknowledges the need to provide suitable housing for all age cohorts provided that the identified need is based on robust and sound evidence. The Practice Guidance (ID: 56-005-20150327) is clear that authorities "should take account of evidence that demonstrates a clear need for housing for people with specific housing needs."</p> <p>Regarding the delivery of homes which are suitable and capable of meeting the needs for older people, the Practice Guidance states that "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling)." To ensure that the policy is effective, TW requests that further guidance is provided, which sets out how the Council will work with developers and housing associations to deliver the necessary homes.</p> <p>Effective – MM/021 does not present a clear guidance as to how the Council proposes to work with developers to ensure that an appropriate mix of housing, to meet identified need is delivered.</p>	Guidance is provided as to how the Council proposes to work with developers and housing associations to deliver the necessary homes which are suitable for older people, and people with restricted mobility.	Paragraph 7.1.4 in MM/021 presents introductory text to the Policies in chapter 7. It is not its purposes to set detail guidance. This is a matter for supplementary guidance.

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0363/M/06/C	Jessica Bond, Taylor Wimpey UK Limited	MM/022	Housing (7.2 Housing Land Supply)		N	<p>Support approach to windfall allowance and refer to para 48 of the Framework. WBC has always delivered units on windfall sites. In the absence of an up to date Local Plan the majority of the Council's supply has taken place on windfall sites. Notwithstanding, WBC is anticipating that windfall sites will only form a small element of future supply once the plan is adopted. TW consider that this is a sensible and robust judgement, given the unreliable nature of supply from windfall sites post adoption of the plan.</p> <p>Dealing with past under delivery since the base date of the Plan is necessary for Wyre, however TW has concerns over the direct reference to the 'Liverpool' method as an approach to managing previous under delivery in the borough. The Framework (para 182) requires plans to be positively prepared on a strategy which seeks to meet the objectively assessed need. Whilst TW accepts the Inspectors opinion that the Liverpool approach is acceptable and justified at this point in time, it is considered that the 'Liverpool' method for dealing with previous under delivery in the longer term does not reflect this principle. Furthermore, the Practice Guidance (ID: 3-044-20180913) states that where authorities are unable to address past shortfalls over a 5-year period, they may need to reconsider their approach to bringing land forward, and the assumptions which they make.</p>	TW considers that the reference to the 'Liverpool' method should be omitted from the WCLP. This is on the basis that the 'Liverpool' method undermines the principles of the Framework which requires development plans to be positively prepared and meet their objectively assessed need.	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. The Inspector concludes in his Post Hearing Advice (paragraph 21) that the use of the 'Liverpool' approach is justified.
0363/M/07/C	Jessica Bond, Taylor Wimpey UK Limited	MM/023	Policy HP1 Housing Land Supply		Y	<p>TW supports the references to 'minimum' and 'at least' in the context of delivering the housing requirement.</p> <p>As the Local Plan is only proposing to meet 97% of its identified housing OAN, it is important that the housing requirement is seen as an absolute minimum figure. It is imperative that the Council is supportive of delivering a higher quantum of development, above its identified requirement to enable it to meet its housing OAN in full. This will ensure that the Local Plan is considered positively prepared in the context of the Framework (para 182), and that it is seeking to meet its OAN in full.</p>	None	Noted.
0363/M/08/C	Jessica Bond, Taylor Wimpey UK Limited	MM/024	Housing (7.3 Housing Mix)		Y	TW supports the degree of flexibility which has been incorporated into the reasoned justification of Policy HP2. The proposed MM will ensure that the Policy is effective, in the context of the Framework whilst retaining a degree of flexibility in the provision of appropriate housing, capable of meeting the need for older people, and those with restricted mobility.	None	Noted
0363/M/09/C	Jessica Bond, Taylor Wimpey UK Limited	MM/065	SA1/16 West of Cockerham Road, Garstang	KDC8	N	<p>Support the MM, and the extension of the allocation boundary and the inclusion of land to the north and west. Supports the inclusion of additional text into KDC 8, which states: "If the Local Planning Authority is satisfied that land is not needed as a result of approved school expansions to provide sufficient additional places at local primary schools to address the impacts of developments in Garstang and surrounding area, a contribution should be made towards the expansion of existing school." As set out in the response to the MIQs, TW commissioned an Education Report to assess the capacity of the existing primary schools within the catchment area for the site. Garstang Community Primary is considered a large enough site to accommodate a three-form entry school that has the capacity to accommodate up to 630 places. There is a combined surplus capacity of 73 primary school places within Garstang Community Primary School, Garstang St Thomas Primary School and, St Mary's and Michael's Primary. Given the existing potential capacity within Garstang Community Primary, and its capability of being expanded, securing financial contributions towards its upgrading is a far more effective way of meet the identified need, than developing and creating a standalone single form entry new school. Extending Garstang Community Primary School would be more logical than a new separate school - infrastructure is in place to facilitate its operation together with a management system. Furthermore, it would be difficult to establish a new school in such proximity to Garstang Community Primary School which is already well established. In this context, it is not necessary to expect the allocation to make the provision of land for a primary school. There is no evidence to justify why land for a new primary school needs to be made available on the allocation. Furthermore, there is existing capacity within other primary schools included within the catchment area, and there is the opportunity to extend Garstang Community Primary, utilising contributions made from S.106 Agreements.</p>	TW recommends the following amendment to MM/065 to read: "A financial contribution is made towards the expansion of Garstang Community Primary School"	No new evidence has been submitted. MM/065 was put forward following discussions at the hearing. KDC8 as proposed to be amended provides flexibility in the Policy. The suggested amendment to MM/065 is too prescriptive and inappropriate. Whether a school is needed is a matter for the Masterplan.

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Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0363/M/10/C	Jessica Bond, Taylor Wimpey UK Limited	MM/090	LPR1 Wyre Local Plan Review		N	<p>TW has concerns regarding the Council's unmet need. However, it supports the Inspector's recommendation to build an early review mechanism into the Local Plan as a measure to ensure that the Council can address its unmet need. This is on the premise that an early review is carried out at the appropriate time. TW has concerns that commencing the partial review straight so soon after adoption is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the Local Plan and forecasts a reasonable timetable for the preparation of a review. Furthermore, in preparing the review of the WCLP, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy.</p> <p>Overall, TW has some concerns regarding the effectiveness of MM/090. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the WCLP which has been time expired since 2006.</p>	<p>TW recommends the following amendments:  - A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review immediately, post adoption of the WCLP;  - Additional text is input into MM/090 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.</p>	<p>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. The DtC will apply to the review of the local Plan. No further text is necessary.</p>
0363/M/11/C	Jessica Bond, Taylor Wimpey UK Limited	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		N	<p>TW strongly supports the extension of the allocation boundary and the inclusion of land to the north and west. As proposed, the allocation will see the release of a well contained parcel of land from the open countryside, which presents the opportunity to deliver a sustainable, residential extension to Garstang. The extension of the allocation boundary enables the site to deliver an additional 160 dwellings, which would make a significant contribution towards meeting the need for market and affordable housing within the borough.</p> <p>It is considered that the extension of the draft allocation boundary is justified, as it will see the release of a well contained site, with no overriding technical or environmental constraints, and can be delivered within the first 5 years of the plan period. The MM is considered effective as it will ensure that the WCLP is able to meet a higher percentage of its OAN than originally proposed in the Publication Draft. It is considered that the proposed MM meets the tests of soundness as set out in the Framework (para 182).</p>	None	Noted.
0398/M/02/C	Alexis De Pol	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	<p>The Inspector's Post Hearing Advice recognises SA1/8 as a sustainable location. There is scope to provide linkages through the site to areas of land to the west. The Inspector states that a greater number of houses would allow a greater contribution to the Poulton Highway Mitigation Strategy and accepts that SA1/8 should accommodate a greater number of dwellings. However there are concerns that there are constraints affecting the site - flood risk and need for a new school and car park - that may constrain the delivery of the site. Even if this is not the case, the Inspector has identified that the highway evidence is high level without robustly modelling the effectiveness of new transport infrastructure in limiting the impact of development. It is understood that the majority of the highway concerns relate to the south of Poulton. Sufficient consideration has not been given to highway operation in the North of Poulton. Suggests the allocation of land to the west of SA1/8 - traffic from this location is likely to distribute north towards the A585 rather than south to the A586. No published evidence of substantial network issues in the immediate vicinity of the site. Local plan is not delivering the full OAHN and as such the proposed site would deliver a greater amount of housing.</p>	Allocate additional land west of SA1/8 for residential development.	<p>The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). Household projections are not housing requirements and it cannot be assumed that the projections translate to a specific implication for a particular site. The amendment to KDC 7 regarding the need for a new primary school on-site has been made in consultation with the Local Education Authority and should not be read as meaning that a new school will not be provided. Advice of the LEA will be sought as part of the Masterplanning process. The site was promoted by Taylor Wimpy through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.</p>
0458/M/02/C	Cabus Parish Council	MM/065	SA1/16 West of Cockerham Road, Garstang		N	<p>We are disappointed that Wyre Borough Council has amended the Settlement Boundary to the West of Cockerham Road to accommodate an increase to the site allocation area of SA1/16 (from 5.81 to 14.52 Hectares) and site capacity (from 100 to 260 dwellings). We feel there is a justified argument to be made NOT to include MM/065 and MM/103 on the following basis: 1. that the latest (2016) Household Projections suggest a 12.5% reduction compared with the 2014-based projections – the proposed site capacity increase from 100 to 260 is excessive and unnecessary 2. that it is highly unlikely that the delivery of a new Primary School would ever materialise on SA1/16, even if the suggested justification for increasing the site area is to accommodate such a facility 3. "The larger site is being promoted by a national housebuilder". Clearly the Planning Inspectorate has access to information which we, as consultees, don't - but the wishes (or promotional activities) of national housebuilders should not be dictating our site allocations for Local Planning purposes</p>	<p>Amend Site Area to read – as per original draft: "5.81 14.52 Hectares"  Amend Site Capacity to read – as per original draft: "100 260 dwellings"</p>	<p>The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). Household projections are not housing requirements and it cannot be assumed that the projections translate to a specific implication for a particular site. The amendment to KDC 7 regarding the need for a new primary school on-site has been made in consultation with the Local Education Authority and should not be read as meaning that a new school will not be provided. Advice of the LEA will be sought as part of the Masterplanning process. The site was promoted by Taylor Wimpy through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.</p>

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0458/M/03/C	Cabus Parish Council	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		N	We are disappointed that Wyre Borough Council has amended the Settlement Boundary to the West of Cockerham Road to accommodate an increase to the site allocation area of SA1/16 (from 5.81 to 14.52 Hectares) and site capacity (from 100 to 260 dwellings). We feel there is a justified argument to be made NOT to include MM/065 and MM/103 on the following basis: 1. that the latest (2016) Household Projections suggest a 12.5% reduction compared with the 2014-based projections – the proposed site capacity increase from 100 to 260 is excessive and unnecessary 2. that it is highly unlikely that the delivery of a new Primary School would ever materialise on SA1/16, even if the suggested justification for increasing the site area is to accommodate such a facility 3. "The larger site is being promoted by a national housebuilder". Clearly the Planning Inspectorate has access to information which we, as consultees, don't - but the wishes (or promotional activities) of national housebuilders should not be dictating our site allocations for Local Planning purposes	Amend Settlement Boundary (SP1), Strategic Area of Separation (SP1), Countryside Area (SP4 and Mixed Use Development (SA3)	The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). The Inspector having considered all submitted written and oral evidence has concluded that it was appropriate to extend the boundaries of site SA1/16 to accommodate additional development to meet identified needs. Household projections do not translate to housing requirements but form the starting point in calculating housing need. As explained in the Council's letter to the Inspector (EL6.004b) an annualised reduction of 33 households compared to the 2014 household projections do not represent a meaningful change. The Council is committed to an immediate partial review of the Local Plan which will consider need based on the Government's standard methodology and applying the relevant household projections. It is not clear why it is thought that the primary school will not be delivered. The Policy allows for the on or off-site provision of additional education provision as appropriate. The site was promoted by Taylor Wimpy through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.
0473/M/02/C	Mr P Barnett	MM/005	Policy SP1 Development Strategy		N	Although the modification increases the housing requirement by over 1,000 additional dwellings, there is still a significant shortfall against the OAHN of 295 households. This has to be seen in the context of significant affordable housing needs and a significant need for older persons housing.	Proposes a new residential allocation at Catterall for retirement village of some 200 houses (plans attached to representation).	The Inspector has not directed the Council to make additional allocations. Furthermore, the suggested site was not proposed at Publication Draft Local Plan stage and it is not an omission site. The representation does not make valid comments on the proposed MMs.
0545/M/01/C	Garstang Town Council	MM/002	Introduction (1.4 The Duty to Cooperate)		N	There is no mention in the schedule of Main Modifications of any movement since 14 November 2017 demonstrating that Lancaster or Preston are prepared to assist towards meeting the Councils housing needs. On the contrary it is likely that Wyre is informally assisting its neighbouring cities.	n/a	As indicated in MM/002 paragraph 1.4.5 the outcome of the last meeting was to await the confirmation of the housing figure and any shortfall through the Wyre Local Plan examination. There have not been any further DtC meetings on this matter. The Council will need to comply with the DtC requirement through the review of the Local Plan.
0545/M/03/C	Garstang Town Council	MM/003	Local Plan Strategy	Para 4.1.11	N	It is disputed that the strategy is "managed"; it is expedient or more colloquially trying to pour a quart into a pint pot. It does not sit easily with the Vision Statement. The strategy envisages that an essential characteristic is the multiplicity of settlements each with its own identity. This historic environment contributes to the character of the place and fosters community spirit. Nobody could disagree with this aspiration but the reality of heavy development increased by the Modifications does not sit easily with it and is unlikely to receive public approval.	n/a	Noted. Comments are not specific to a MM/003. Paragraph 4.1.11 clarifies the strategy. The terms 'manage' adds clarity to the document.
0545/M/04/C	Garstang Town Council	MM/004	Strategic Policies (5.1 Introduction)	Para 5.1.1	N	The provision of development in the A6 corridor is increased but little attempt at providing high technology employment which will retain the workforce in Wyre.	n/a	The comment does not relate to MM/004. The increase of development along the A6 is not significant that would require further employment allocations.
0545/M/05/C	Garstang Town Council	MM/005	Policy SP1 Development Strategy		N	States that new build development will take place within, existing, settlement boundaries. The increase of dwellings will automatically extend settlement boundaries until the draft plan is produced in the next decade. We wish to see evidence that settlement boundaries have not been breached.	n/a	The comment is not specific and appears to be more related to policy implementation.
0545/M/06/C	Garstang Town Council	MM/006	Policy SP2 Sustainable Development	Point 1	N	Requires that all development "contributes positively to overall physical, social, environmental and economic character of the area in which the development is located" without explaining in practical terms how this might be achieved and measured.	n/a	Policy SP2 is a strategic policy designed to set the broad strategic framework within which the more detailed policies. It reflects the concern of national planning guidance with the three elements of sustainability - economic, social and environmental. The detailed policies of the Plan give force to the strategic requirements of Policy SP2. Section 10 of the Plan establishes a monitoring framework.
0545/M/07/C	Garstang Town Council	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4	N	The new wording stresses that the open and rural character of the countryside is intrinsic to the identity of and sense of place. A string of development along the west of the A6 between the Cockerham Road and Longmoor Lane will soon obscure the once peaceful rural setting by the combined impact of over 500 dwellings and a convenience store. Residents are unlikely to accept the justification. There must be a more imaginative solution to the location of new housing. Appendix E demonstrates that the Borough is becoming two regions separated by acres of unbuilt, sparsely populated mid-lands where a town the size of Milton Keynes could be dropped into without anybody noticing. All that is preventing a long term solution is the limit of our imaginations.	n/a	The representation appears to be concerned with the implementation of Policy SP4 and the impact of development on the countryside at Garstang rather than a comment on the wording of the modification itself. The Local Plan balances a wide range of needs and requirements, including meeting development needs and the protection of the countryside.
0545/M/08/C	Garstang Town Council	MM/013	Policy SP8 Health and Well-Being		N	There is a lacuna specifying what "public health" issues that development might adversely have impact on. The authors of the report must have an idea what they are thinking of and we need to know.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0545/M/09/C	Garstang Town Council	MM/015	Policy CDMP2 Flood Risk and Surface Water Management		N	It is generally known by those in Flood Prevention Groups that these schemes are not managed strictly following the completion of the development. A legally binding and, importantly, enforceable, agreement must be written into any scheme.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification. "These schemes" is not clearly defined.

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0545/M/10/C	Garstang Town Council	MM/018	Policy CDMP4 Environmental Assets		N	"development will have no unacceptable cumulative impact on landscape character "within or outside settlement boundaries" etc. Any restriction is welcome but the definition and examples of "unacceptable cumulative impact" needs to be fleshed out so that residents can measure these impacts. We argue that developments such as the Cockerham Road and Nateby Fields that combine to form 500 new families, 1,000 extra cars and associated movement is a prime example of what this policy is designed to prevent.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0545/M/11/C	Garstang Town Council	MM/021	Housing 7.1 Introduction	Para 7.1.4	N	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.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0545/M/12/C	Garstang Town Council	MM/026	Housing (7.4 Affordable Housing) and	HP3	Y	We support the revised policy that these dwellings need to be integrated into the development and subject to conditions in Planning Consents that are inflexible.	n/a	Noted.
0545/M/13/C	Garstang Town Council	MM/032	Policy HP8 Accommodation for Gypsy, Travellers and Travelling Showpeople		N	<i>Refers to MM/031 and MM/032 but logged as MM/032 as the comments refer to the allocation</i> Although not in Garstang Parish, Conway is situate at the Northern Toll Bar and the entrance to Garstang. We naturally wish to see strict screening conditions that are enforced to ensure that the site is not in conflict with its essential rural surroundings. The present site at Utopia Park is a mix of caravans and motor homes and large HGVs and trailers carrying fairground equipment and is open to view from the River Wyre footpath.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification. Conditions are a matter for the development management process.
0545/M/15/C	Garstang Town Council	MM/047	Site Allocations	Para 9.1.2	N	We seek clarification of the meaning of the deleted last sentence beginning" In view of the fact that due to highway constraints dwelling numbers are maximum....." Did this mean that there could be no more development and if so what has changed?	n/a	The highway evidence submitted by Lancashire County Council established maximum numbers which could be supported by the local highway network with certain deliverable improvements. The Inspector having considered the submitted evidence considered that some additional development could be supported. Furthermore additional highway assessments need to be carried out by way of an immediate review of the Local Plan in order to determine whether further development to meet the full Objectively Assessed Need for Housing can be supported.
0545/M/16/C	Garstang Town Council	MM/065	SA1/16 West of Cockerham Road, Garstang		N	Though not in the parish of Garstang this and other sites to the north and the south have significant impact on services and the environment that have been overlooked. We are extremely concerned that it is now proposed to allocate 260 homes on this triangular site in a quiet clearly rural backwater of the borough especially as the land immediately to the south fronting the A6 has permission for 269/270 a combined total of in excess of 500 homes and 1,000 families and associated vehicles. Although these sites are partly justified by the comment that they are only half a mile from Garstang centre, i.e., walking distance it should not be forgotten that even if speed limits are reduced the volume of traffic on the A6 is such that if you wish to live to a ripe age you do not attempt to cross it. This site fails the test of cohesion with its parent community and its impact on the landscape and its special quiet and highly valued Nateby Crossing Lane.	n/a	The Inspector has concluded that it is appropriate to extend allocation SA1/16 to accommodate an additional 160 dwellings. Garstang is a sustainable settlements with a range of services and facilities and employment opportunities.
0545/M/17/C	Garstang Town Council	MM/066	SA1/17 Land South of Prospect Farm, Garstang		N	The increase in homes is justified entirely on the basis of having to find additional numbers rather than for reason of an attractive site lay out with room to breathe and move. The site will become indistinguishable from any other.	n/a	The Local Plan includes policies to ensure that development is of high quality
0545/M/18/C	Garstang Town Council	MM/067	SA1/18 South of Kepple Lane, Garstang		N	Kepple Lane has experienced perhaps the greatest change since the present plan was approved in 1999. It is a narrow road with twists and turns and a very busy medical centre half way down on the south side. It does not lend itself to traffic measures and the primary school and the unsighted canal bridge are serious points of conflict between children, pedestrians and vehicles. Additional allocations have no justification and they fail the Vision test.	n/a	The amendment to the capacity of site SA1/18 (MM/067) reflect the two permissions on the site.
0616/M/02/C	Claughton on Brock Parish Council	MM/010	Strategic Policies (5.6 Forest of Bowland AONB) and Policy SP5 Forest of Bowland AONB	Para 5.6.3 SP5	N	No specific issue with the modification wording however I consider that more needs to be stated. Policy SP5 is to protect from proposed damaging or potentially destructive development proposals and applications, irrespective of whether they are within or outside of the AONB or both. My concern is to ensure that policies are capable of adjusting and adapting to meet the needs of the local economy as we are living in a volatile and changing world both economically and environmentally. The policies need to have the capability to enable the Planning and Development Officers the leeway to respond to changes in Central Government Policies. In this specific instance I would highlight Agricultural Policy - as we simply do not know what this will be in a 'Post Brexit Britain'.	I suggest revised wording (additions are in italic font):  Amend Policy SP5, Point 1 to read:  "The <u>landscape and scenic beauty of the</u> Forest of Bowland AONB will be protected from any development which would affect <u>the</u> character, appearance and setting <u>of the AONB</u> . <i>The processes of planning and development decision making must also seek to both accommodate the requirements and demands of both the local economy and new or modified central government economic, agricultural, ecological or other relevant policies.</i> "	The representation raises issues not previously raised and not directly relating to the changes to the policy under MM/010.  In any event the suggested wording is not necessary or appropriate. In determining planning applications the Local Authority must take into account relevant material considerations which may include the matters suggested as an amendment to the policy.

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0645/M/01/C	Nether Wyresdale Parish Council	MM/003	Local Plan Strategy	Para. 4.1.4 Para. 4.1.11 Para. 4.1.25	N	<p>Para. 4.1.5 - This part of the modification is generally supported however, in the last line the Parish Council would like to see a stronger reference/addition to those aspects that contribute to settlement identity expanded. 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. The importance of setting could be considered in the case of individual settlement studies be carried out in the future. In addition the issue of setting can also be a material consideration in assessing the potential impact of development on heritage assets in which countryside can play an important and integral part of such consideration.</p> <p>Para. 4.1.11 - Expand the policy wording to refer to other important material planning considerations affecting the appropriate locations for development as proposed within the plan.</p> <p>Para. 4.1.25 - Modification supported but would add a reference to the countryside.</p>	<p>Para. 4.1.5 - the last line should be modified to read "protects the overall character of Wyre and in many cases is an important factor in providing the identity, character and landscape setting of individual settlements".</p> <p>Para. 4.1.11 - amend wording to read - "The Council has not based the strategy solely on the highways evidence albeit that was a major consideration. It has taken account of other evidence including issues of flood risk, the locational sustainability of existing settlements to accommodate development, the need to protect the intrinsic value of countryside landscapes and the character and setting of individual communities. With regard to the latter.....".</p> <p>Para. 4.1.25 - add.... 'Countryside designation' after "The Green Belt.....".</p>	<p><b>It is noted that this representation appears to relate to para. 4.14 not 4.1.5.</b> The Council does not support the amendment as supported. It is not concise and clear. <b>However it would not object to the addition of 'character and landscape setting of individual settlements' so that the sentence would read "... Protects the overall character of Wyre, the identity of separate communities and the character and landscape setting of individual settlements" if the Inspector considers it improves clarity.</b></p> <p>The suggested amendments to paragraph 4.1.11 are not considered necessary and do not add anything to the plan.</p> <p>The suggested amendment to paragraph 4.1.25 is not considered necessary.</p>
0645/M/02/C	Nether Wyresdale Parish Council	MM/006	Policy SP2 Sustainable Development	Point 1	N	Amend the new Point 1 to read (see underlined text below for additional wording) "All development should contribute.....development is located. <u>Where development fails to meet this development criteria, it will be deemed as unsustainable and will be refused</u> ".	See summary.	The suggested amendment is not considered necessary or appropriate. Development proposals fall to be considered against the local plan as a whole and any other material considerations.
0645/M/03/C	Nether Wyresdale Parish Council	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4, point 1	N	The Parish Council supports the Modifications to Policy SP4. Point 1 should be amended (suggested additional wording underlined) as follows: "The open rural character of the countryside will be recognised for its intrinsic character, beauty <u>and landscape role it can play in defining the character and setting of individual rural settlements.</u> Development which....."	See summary.	The suggested to Policy SP4 Point 1 is not in line with the NPPF and therefore not supported.
0645/M/04/C	Nether Wyresdale Parish Council	MM/010	Strategic Policies (5.6 Forest of	SP5	Y	Policy Modification strongly supported.	None.	Noted.
0645/M/05/C	Nether Wyresdale Parish Council	MM/016	Policy CDMP3 Design		N	The Parish Council would suggest changes of the wording as follows (see crossed out and underlined text below). All development must be designed to <del>respect or enhance</del> <u>and respond to the distinctive character of the area as defined</u> .....having regard to <del>issues including</del> density, siting, layout, <del>form</del> , scale, height, <del>massing, proportion, visual characteristics</del> , orientation, landscaping and use of materials.	See summary.	The suggested amendment is not considered necessary or appropriate. The policy is not intended to offer a comprehensive list of design matters to be considered, indicated by the use of the word "including". Further the suggested amendments have not been clearly or sufficiently justified. It is not appropriate to delete 'and minimise energy consumption'
0645/M/06/C	Nether Wyresdale Parish Council	MM/017	Core Development Management Policies (6.5 Environmental Assets)		Y	Modification strongly supported.	None.	Noted.
0645/M/07/C	Nether Wyresdale Parish Council	MM/019	Policy CDMP5 Historic Environment		Y	Policy Modification supported.	None.	Noted.
0645/M/08/C	Nether Wyresdale Parish Council	MM/022	Housing (7.2 Housing Land Supply)		Y	The Parish Council supports the Modification and particularly the 'Liverpool Method' to address the supply shortfall rather than the 'Sedgefield Method' to ensure more realistic delivery and certainty proposed within the development within the strategy and associated policies of the Local Plan.	None.	Noted.
0645/M/09/C	Nether Wyresdale Parish Council	MM/028	Policy HP6 - Rural Workers Accommodation in the Countryside		Y	Policy Modification supported.	None.	Noted.
0645/M/10/C	Nether Wyresdale Parish Council	MM/044	Economy (8.9 Holiday Accommodation) and Policy EP9	EP9	Y	Policy Modification supported.	None.	Noted.



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0645/M/011/C	Nether Wyresdale Parish Council	MM/046	Economy 8.11 and Policy EP11 Protection of Community Facilities in Rural Areas	EP11	Y	Policy Modification supported.	None.	Noted.
0645/M/012/C	Nether Wyresdale Parish Council	MM/089	Monitoring the Local Plan		Y	The Parish Council supports the proposed 'housing position' and the comment that states "This Local Plan includes sufficient land to meet identifies needs in the first five years post adoption".	None.	Noted.
0654/M/02/C	James Procter	MM/102	Policies Map SA1/13 Inskip Extension		N	Objects to the allocation at Dead Dam Bridge. 1) Ethylene pipeline - easement/space needed for maintenance and repair - see map attached to representation 2) Flood risk - concern about flooding from Upper River Wyre. Recent experience of flood warning resulting from Storm Callum. More housing could magnify the problem - more concrete and less soakaways. Own garden floods in heavy rain. Difficulty of obtaining insurance to cover flood risk as in a flood risk area. Two gas pipelines and flood risk - fail to see how the land can be a suitable place to built 70 houses. Original allocation north of Preston Road on higher ground was a greater distance from the flood zone and is on higher ground.	Original suggestion was that Inskip had a great opportunity to enhance amenities with a village green. Where is this going to be located and what size? Please don't let it become a small grassed area squeezed into the middle of a housing estate.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south west of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site.  The site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development.  The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply.  The land to the south west of Inskip is largely in Flood Zone 1 and has been considered through the Strategic Flood Risk Assessment (ED112) and Sequential Test (EL8.007). Policies exist in the Plan to address flood risk matters. The Key Development Considerations attached to SA1/13 requires housing to be built outside of Flood Zones 2 and 3.  The council has confirmed with representatives of the pipeline operator that the easement is 3m either side of the pipeline. The representor has submitted a plan claiming to show an "easement" that is clearly wider than 3m. There is no documentation that supports this contention.  A second pipeline is mentioned. There is a high pressure gas pipeline east of the adjacent Lataus Farm. Due to the separation distance it has no bearing on the allocated site.
0659/M/02/C	Inskip-with-Sowerby Parish Council	MM/062	SA1/13 Inskip Extension	KDC1	N	An additional 155 dwellings will destroy the essential character of the rural settlement, is not reasonable, and is NOT JUSTIFIED. The Parish Council agree with Para. 30 and Para. 31 of the Planning Inspector's Post Hearing Advice (Main Modifications) and assert that the revised allocation for Inskip is not in accordance with the Inspectors Post Hearing Advice (Main Modifications). The proposed growth represents a 77% increase which is a massively disproportionate and unsustainable scale of development. The lack of local infrastructure makes the level of development proposed at Inskip unsustainable and NOT CONSISTENT WITH NATIONAL PLANNING POLICY. The proposed expansion of Inskip fails the criteria set at Para. 6.27 of the "Wyre Local Plan Issues and Options" in June 2015 at which time the Parish Council advised that any expansion should be restricted to approximately 50 additional dwellings. As stated in in our submission to the Publication Draft Wyre Local Plan, the Inskip Extension proposal is unsustainable owing to concerns with highways (i.e. highway loads, deep ditches, volume of traffic and accidents etc.), lack of local infrastructure and services (i.e. health, shop, limited bus routes etc.) and job opportunities (i.e. commuting, no train station etc.) Concern also raised regarding wording of KDC1 which states that "the development should incorporate a small village green". Inskip-with-Sowerby Parish Council feel that a proposal for a "small" village green does not match the Parish Council vision which has been discussed with Wyre Council a number of times (inc. email dated 7th November 2016). KDC1 also states that "the land immediately to the west of the school should only be used for an extension to the primary school". This infers that land immediately to the north of the school might be used for housing development which has not been discussed.	1) The Wyre Local Plan needs to offer a level of development that is sustainable and is commensurate with the extremely modest infrastructure delivered in this remote rural setting – up to 55 additional dwellings maximum rather than the current proposed 155 additional dwellings;  2) Key Development Consideration (1) to be amended to read: "The development should incorporate a small-village green. The land immediately to the north and west of the school should only be used for an extension to the primary school" in order to allow the Main Modification to accurately reflect the vision proposed for Inskip.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south west of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site.  The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply.  The reference to a "small" village green is appropriate taking into account that 55 dwellings in the allocation already have planning permission.  The comment regarding the land to the west of the school does not relate to a proposed modification. That part of KDC1 is as was set out in the Publication draft Local Plan.

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Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0676/M/04/C	Environment Agency	MM/050	SA1/1 West of Broadway, Fleetwood		n/a	There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change for the life of the development.  'this' has been shown as strikethrough in error. This sentence should read: Where finished floor levels cannot be set above the 1-in-200-year plus climate change flood- <u>this</u> level, the developer....."	See summary.	The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.  The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of <0.5% change of flooding level plus an allowance for climate change ...."
0676/M/05/C	Environment Agency	MM/080	SA3/1 Fleetwood Dock and Marina	KDC4	n/a	There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change for the life of the development.	See summary.	The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.  The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of <0.5% change of flooding level plus an allowance for climate change ...."
0676/M/06/C	Environment Agency	MM/085	SA4 Hillhouse Technology Enterprise Zone, Thornton	KDC3	n/a	There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change for the life of the development.	See summary.	The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.  The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of <0.5% change of flooding level plus an allowance for climate change ...."
0676/M/07/C	Environment Agency	MM/086	SA5 Port of Fleetwood	KDC2 KDC (NEW)	n/a	1. There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change for the life of the development.  2. We wish to clarify that Copse Brook is a culverted non-tidal Main River and that the 16 metre easement is in relation to the top of the bank/quay wall of the River Wyre and landward toe of any Environment Agency tidal flood defences. As such, we would suggest the new text should be revised as follows: The River Wyre and Copse Brook are designated Main Rivers and subject to the requirements of the Environmental Permitting (England and Wales) Regulations 2016. An Environmental Permit from the Environment Agency is therefore required for any proposed works or structures in, under, over or within 8 metres of the edge of the Copse Brook culvert, and 16 metres of the top of the bank/quay wall, or landward toe of the Environment Agency flood defences, of the tidal River Wyre...	See summary.	The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.  The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change ...."  The Council suggest that a further amendment would be appropriate to state – "KDC2. <u>The River Wyre and Copse Brook are</u> is designated Main Rivers. The prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the edge of the Copse Brook Culvert, and 16 metres of the top of the bank/quay wall, or landward top of the Environment Agency flood defences, of the tidal River Wyre. An open space buffer should be provided to protect the watercourse from detrimental impacts.
0766/M/02/C	AR & A Chippendale Farming Partnership	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		Y	We support a new primary school at this proposed site. A number of local schools have issues regarding access and parking, and new developments will lead to overcrowding of existing schools. A new school is the best solution to facilitate these problems and helps to supply the demand for new school places in the area. Therefore in order to deliver a primary school, we agree with the inspectors recommendation to extend the boundaries of site allocation SA1/16 to the west of Cockerham Road, Garstang.	None	Noted.
0774/M/02/C	Bruce Ramsden	MM/052	SA1/3 Land Between Fleetwood Road North and Pheasant Wood, Thornton	KDC4	N	KDC4 contains a double negative wording regarding flood risk	See summary	The council acknowledge a typographical error in the wording of KDC4 (the word "no" should be crossed out in the modification) and will amend so that the text reads  "Parts of the western and southern boundaries lie within Flood Zones 2 and 3 where housing will not be permitted".

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0785/M/01/C	John Carr	MM/083	SA3/4 Forton Extension		N	Removal of land south and east of Sunnybank Nurseries is contrary to the NPPF 2018 para's 7-10 (achieving sustainable development), 16 and 35 (plan making), section 9 (promoting sustainable transport) and section 12 (achieving well designed places) and hence unsound. The removal of said land will preclude the creation of sustainable links - including improved pedestrian and cycling - between Forton and Hollins Lane. The land occupies a strategic location between the two settlements. The proposed deletion fails to adequately consider "sustainable development". Residents of Hollins Lane would be segregated from the facilities - existing and proposed - in Forton. Would leave existing residents of Hollins Lane almost entirely dependent on car ownership. Disagree with the rationale for the deletion of said land on the basis of coalescence. No set criteria for assessing coalescence. In allocating the land Wyre council considered that development of the land would not create coalescence. The council sought to mitigate concerns about coalescence through the suggested provision of green infrastructure prior to the commencement of hearings. Forton and Hollins Lane are physically separated by the A6. The scale of the two settlements and distance between them is so slight that typical coalescence concerns are not applicable. Lack of any distinctive character or style within the locality which would warrant the need for segregation. Developing the land would still provide the scope to prevent unacceptable visual and physical coalescence. Facilitating sustainable development outweighs the need to preserve the separation between Forton and Hollins Lane. Further, the land is considered to be the most logical for community service provision given its equidistant location.	Allocate the land proposed to be removed.	The Inspector has considered the all written and oral evidence, pre and during the hearing sessions in relation to the soundness of the allocation in policy SA3/4 and concluded that the allocation of the subject land is contrary to the principles of soundness and should be removed from the allocation.
0794a/M/02/C	Wainhomes	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Given the highway position, the capacity of allocations should not be limited to a total as there is the potential for sites to deliver more housing. Limiting housing does not boost the housing land supply in accordance with the NPPF.	Delete "Total Capacity" and replace with "anticipated delivery".	The terminology "Total site capacity" is not subject to a Main Modification. In any event the suggested change is not appropriate. Also modifications MM/005 and MM/023 make it clear that the housing figure of 9,285 dwellings over the plan period is a "minimum". This is unrelated to any highway position.
0794a/M/03/C	Wainhomes	MM/058	SA1/9 South Stalmine		N	Given the highway position, the capacity of SA1/9 should not be limited to a total as there is the potential for sites to deliver more housing. Limiting housing does not boost the housing land supply in accordance with the NPPF. The requirement for home owner packs is unreasonable given the distance between the site and Morecambe Bay, with no direct link.	Delete "Site Capacity" and replace with "anticipated delivery".	The terminology "Total site capacity" is not subject to a Main Modification. In any event the suggested change is not appropriate. Also modifications MM/005 and MM/023 make it clear that the housing figure of 9,285 dwellings over the plan period is a "minimum". This is unrelated to any highway position.  The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217).
0794a/M/04/C	Wainhomes	MM/100	SA1/9 South Stalmine		Y	Supports the proposed alteration to allocation SA1/9 as a more accessible extension to Stalmine. In control of a major housebuilder which will provide for the delivery of the site.	n/a	Noted.

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0794b/M/02/C	Wainhomes	MM/003	Local Plan Strategy		N	<p>Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full.</p> <p>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.</p> <p>An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full.</p> <p>The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.</p>	See summary.	<p>The shortfall amount to less than a year's supply over the period to 2031 and will be addressed through the immediate review of the Local Plan.</p> <p>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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met.</p> <p>The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal.</p> <p>It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.</p>
0794b/M/03/C	Wainhomes	MM/004	Strategic Policies (5.1 Introduction)		N	<p>Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full.</p> <p>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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.</p>	See summary.	<p>The shortfall amount 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.</p> <p>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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy.</p> <p>The representor provides no new evidence why delivery rates will not be met.</p> <p>The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal.</p> <p>It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.</p>

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0794b/M/04/C	Wainhomes	MM/005	Policy SP1 Development Strategy		N	Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full. 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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.	See summary.	The shortfall amount 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. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0794b/M/05/C	Wainhomes	MM/021	Housing 7.1 Introduction		N	Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full. 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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.	See summary.	The shortfall amount 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. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0794b/M/06/C	Wainhomes	MM/022	Housing (7.2 Housing Land Supply)		N	The Housing Implementation Strategy (2018) provides for a new methodology for calculating the 5-year housing land supply, and this is reflected through Main Modification MM/22. The Council's housing land supply position would be marginal even with the benefit of the Liverpool Method in terms of addressing the backlog. The threshold in terms of achieving a deliverable 5-year housing land supply is 3,340 dwellings based on the Council's methodology. It would take for 133 dwellings to fail to be delivered over the 5-year period for the housing land supply position to fall short of 5-years. The Council's approach serves to emphasise the absence of contingency and the risks in terms of the plan becoming out-of-date subsequent to adoption when the 5 year supply is assessed against the deliverability test in the revised NPPF and PPG. Our reading of the NPPF and PPG is that paragraphs 73b and 74 would not apply to this plan when read alongside the PPG (ref 3-049-20180913). Even if it did the period of grace is limited.	n/a	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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The Council is committed to an immediate review of the Local Plan which includes updating housing need in line with the latest Government Guidance. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.

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0794b/M/07/C	Wainhomes	MM/090	LPR1 Wyre Local Plan Review		N	Acknowledge the potential benefits arising from the incorporation of a Local Plan Review mechanism e.g. securing a plan-led system. However, it would only serve a meaningful planning purpose where the plan secures a robust 5-year housing land supply and developable supply over the plan-period; otherwise, the plan is likely to become out-of-date shortly after adoption and the benefits of incorporating a Local Plan Review mechanism will not be realised.  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. However, the Council's 5-year housing land supply position upon adoption of the emerging local plan would be marginal and against the less onerous revised and PPG. It is not clear that the Council has exhausted all options to ensure that a more robust 5-year housing land supply could be achieved.	In terms of the actual wording Policy LPR1 of the Local Plan, we would suggest that the wording should be revised to emphasise that the OAN should be met in full as a minimum; the OAN should not represent a ceiling to housing development. In terms of part 2 of this policy, the review of the transport and highway issues should fully reflect the concerns raised by the Inspector at paragraph 13 of his Report e.g. the modelling should be more robust and LCC's approach to severe congestion should be reviewed. It is not sufficient to simply say that the Council will undertake a review of housing and highway scheme commitments as per 2(i, ii, iii and iv) of this policy; this policy should provide sufficient confidence that the Council will undertake a thorough review of the evidence base with regards to highways constraints alongside LCC.	The Local Plan when adopted will have a five year land supply. The Representor provides no new evidence to indicate why the Local Plan will become out of date soon after adoption. It is also not reasoned why the Local Plan review will not be realised. The suggested alterations to Policy LPR1 are not meaningful or appropriate. Whether the updated OAN is met in full would be a matter of consideration by the review based on updated evidence. The proposed policy is sufficiently robust and detailed.
0794b/M/08/C	Wainhomes	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton		N	Support revised wording to the allocation policy in relation to highway infrastructure and education provision, but remaining lack of clarity on the evidence for the latter. Attempts made to engage with the Education Authority to ascertain their requirements but limited response.	n/a	Noted. Evidence for requirement for education provision has been the subject of the public hearings. The Policy as proposed to be modified allows for flexibility in terms of the nature of provision. The council is unable to comment on contact between the representor and Education Authority.
0794b/M/09/C	Wainhomes	MM/058	SA1/9 South Stalmine		Y	Support revised site boundary and flexibility in relation to education provision.	n/a	Noted.
0808/M/02/C	Story Homes	MM/001	Introduction (1.1 Introduction)		Y	Support modification	None	Noted.
0808/M/03/C	Story Homes	MM/002	Introduction (1.4 The Duty to Cooperate)	Para. 1.4.8	Y	Support inclusion of para 1.4.8 committing the Council to early review and Submission of partial review by early 2022	None	Noted.
0808/M/04/C	Story Homes	MM/003	Local Plan Strategy	Para. 4.1.11 Para. 4.1.18	N	Object to Council's continued reference to transport, flooding and a 'managed dispersal' strategy as proposed in para 4.1.11. Clear from Post Hearing advice that LCC Report (ED094a) is high-level desktop assessment and does not robustly model how new transport infrastructure could cost effectively limit the significant impact of development. Para 9 states 'managed dispersal' strategy is likely to increase reliance on private vehicle and longer distance travel. LCC report not sound basis upon which to base a Development Strategy.  Inspector's note is clear that flood risk not an overriding concern.  Seek clarification at para 4.1.18 and inserted appendix E, housing requirements are minimums and not capped totals.	Appendix E column "total" should be replaced with "Minimum Expected Number of New Homes in Each Settlement" given that housing requirements are minimums and not capped totals.	The strategy remains a 'managed dispersal' strategy 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.  Appendix E is not a new table but an updated version of the table previously following paragraph 4.1.18. The table in Appendix E is for information. It is clear in policies SP1 and HP1 that housing figures are a minimum.
0808/M/05/C	Story Homes	MM/005	Policy SP1 Development Strategy		Y	Support modification regarding change to housing requirement.	None	Noted.
0808/M/06/C	Story Homes	MM/007	Strategic Policies (5.4 Green Belt)	Para. 5.4.2 Para. 5.4.4	Y	Support clarification at para 5.4.2 that the Green Belt at Blackpool Road does not fulfil any Green Belt function.  Support clarification at para 5.4.4 that exceptional circumstances exist for removal of land from Green Belt.	None	Noted.
0808/M/07/C	Story Homes	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para. 5.7.2 Para. 5.7.3 SP6	Y	Support modification that recognises flexibility in development format might be needed on site by site basis.	None	Noted.
0808/M/08/C	Story Homes	MM/021	Housing 7.1 Introduction	Para. 7.1.4	Y	Support para. which recognises that a wide range of housing is needed.	None	Noted.

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0808/M/09/C	Story Homes	MM/022	Housing (7.2 Housing Land Supply)		N	The windfall threshold of "less than 25 dwellings" is unclear - windfall is windfall. Agree that the windfall allowance should only take effect from 31 March 2021 to avoid double counting. Disagree with the use of the 'Liverpool' method as the basis for dealing with a shortfall. The Inspector has concluded that there is no evidence to support flooding and highway constraints to delivery. 'Sedgefield' method more appropriate. The council could undertake a call for sites exercise to identify the additional land it requires. The argument at para. 7.2.6 that the 'Sedgefield' method is not appropriate because the Plan would become out of date quickly after adoption is counterintuitive when the council has committed to undertaking an early review. The 'Liverpool' method is incompatible with an early local plan review. The Story Homes site at Blackpool Road can yield more homes than suggested by the council. The inclusion of a 20% buffer at para. 7.2.7 is supported.	See summary of representation.	The introduction of a windfall allowance for sites of less than 25 dwellings is in line with the Inspector's conclusions at paragraph 20 of his Post Hearing Advice.  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. No new matters are raised in the representation.
0808/M/10/C	Story Homes	MM/023	Policy HP1 Housing Land Supply		Y	Support changes to housing figures	None	Noted.
0808/M/11/C	Story Homes	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	HP3	Y	Support modification to HP3 regarding affordable housing	None	Noted.
0808/M/12/C	Story Homes	MM/035	Policy HP10 Houses in Multiple Occupation		N	The new test of harm to the living conditions of existing residents would require an audit of said living conditions before any impact can be measured - too onerous.	See summary of representation.	MM/035 does not introduce a new test but replaces the expression in criterion a) 'amenity of neighbouring properties' to improve the clarity of the document. This is in line with the Inspector's suggestion in his Preliminary view (EL1.001a paragraph 51)
0808/M/13/C	Story Homes	MM/047	Site Allocations	Para. 9.1.2 Para. 9.1.6	Y	Supports the deletion of the reference to highway caps.  The council's masterplan guidance is cumbersome and unclear in respect of the council's responsibility as the custodian of each masterplan. Unclear who is responsible for each masterplan and whether the council has the resources and expertise to produce the documents. Does not affect the soundness of the local plan but it is important to clarify 9.1.6 as this could frustrate delivery.	See summary of representation.	This is not a comment relevant to the MM/047 with regards to paragraph 9.1.6. Consequently it is not clear what amendment to paragraph 9.1.6 the representor requires.  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 masterplan guidance is clear that the role of the council is that of a facilitator and that the production of masterplan documents is the responsibility of landowners and their agents. It follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements the guidance is commensurate with submitting an outline planning application. To a person with the right experience in preparing a masterplan it is not a complicated process. The preparation of a masterplan will not delay delivery if landowner /developers work together and employ consultants with the right expertise. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing.
0808/M/14/C	Story Homes	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	Supports the release of SA1/8 from the Green Belt - agrees that exceptional circumstances exists to warrant its removal. It is a sustainable site in a sustainable location. However: Unclear how the revised yield of 300 properties has been derived. The allocation boundary could be extended to include more land for homes, car park (if justified) and school. The car park is not required to justify the allocation - part of a wider initiative and would attract more traffic to the town centre. Its purpose is unclear. Remove references to making (undefined) cycle and pedestrian improvements outside of the area. The contribution to a new drain at Skippool Creek is undefined and could adversely affect viability. Undefined highway contributions could adversely affect viability. Object to the additional key development consideration regarding home owner packs (relating to impacts on Morecambe Bay European nature conservation site) - unenforceable and unjustified.	See summary of representation. Extend allocation boundary to enable sufficient land for the school to be included.	The new yield of 300 was calculated using the same basic methodology as all other allocations but assumes a higher net developable area outside of the flood zone on the assumption that the flood zone will be the location of a significant amount of the green infrastructure. The capacity takes into account the need for a new school and car park and need to avoid housing in the area of Flood Zone 2 and 3. The council has taken into account the submitted indicative schemes and the fact that a different dwellings mix and layout could increase the density and capacity of the site. The council has not prepared an indicative design studies for any allocations and this matters has not previously been raised. The representor does not indicate that the proposed capacity is inappropriate and has not put forward an alternative capacity for the site. There is no need for the allocation to be extended to accommodate the school. The request to extend the boundaries of the allocation is not a valid comment on the MM. The requirement for the provision of a car park as part of Poulton-le-Fylde Highway Mitigation Strategy and as part of Policy SA1/8 the is not matter covered by the MM and therefore not a valid comment at this stage. The comment relating to pedestrian and cycle connectivity outside the site does not relate to a MM change and therefore it is not a valid comment.  <b>Continued on the line below</b>

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								There is no requirement for a new drain at Skippool Creek. The requirement for contribution towards the replacement of the tidal flap is not a new matter. This comment does not relate to a MM change and therefore it is not a valid comment. The Poulton-le-Fylde Highway Mitigation Strategy has been accepted and it is right that it remains a live document taking into account new evidence. The Local Plan includes a policy relating to viability. The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217.
0808/M/15/C	Story Homes	MM/089	Monitoring the Local Plan	Para. 10.4.2	Y	Supportive of the additional text at sections 10.2 to 10.4. Paragraph 10.4.2 needs to clarify that the early review needs to be submitted for Examination by early 2022 in line with the Inspector's comments.	Clarify para. 10.4.2.	Policy LPR1 refers to the submission for examination by early 2022 hence no further amendment is required.
0808/M/16/C	Story Homes	MM/090	LPR1 Wyre Local Plan Review		Y	Supportive of Policy LPR1.	None.	Noted.
0902/M/02/C	Pipercroft Ltd	MM/005	Policy SP1 Development Strategy		N	The addition of 'a minimum' to the text relating to the housing target is welcomed. However, there are still significant concerns that the Local Plan sets a housing target which will not deliver the OAHN for the borough. There are additional sites within the borough that are currently available and deliverable, and their allocation could enable the Council to deliver the OAHN during the plan period.	Allocate more housing sites to meet the OAHN.	The shortfall will be addressed through the review of the Local Plan. The Inspector has concluded that this is an appropriate way forward.
0902/M/03/C	Pipercroft Ltd	MM/022	Housing (7.2 Housing Land Supply)		N	The Sedgefield method would be preferable in order to meet the shortfall in housing delivery as soon as possible, as required by Government policy. Furthermore, there are additional sites available which could be developed in the short term.	Use of the Sedgefield method for calculating housing land supply.	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. No new matters are raised in the representation.
0902/M/04/C	Pipercroft Ltd	MM/023	Policy HP1 Housing Land Supply		N	Significant concerns that the Local Plan will not, as a minimum, meet the OAHN and therefore cannot be considered to meet the needs of the borough during the Plan period. There are additional sites in the borough which are available and deliverable, allocating some of these sites could enable to the Council to meet the OAHN. Notwithstanding the above, the addition of 'a minimum' to the overall housing target and 'at least' to the annual requirement is supported. The deletion of point 2 of the policy is also welcomed.	The allocation of additional housing sites to at least meet the OAHN.	The Local Plan provides for 97% of the OAN. The small outstanding shortfall (of less than a year's supply) will be addressed through the review.
0902/M/05/C	Pipercroft Ltd	MM/090	LPR1 Wyre Local Plan Review		N	There are significant concerns about an early review of the Local Plan and in particular the timescales for the review. As the LPA has accepted that the current proposed Local Plan will not meet the OAHN for the borough, the review should take place as a matter of urgency. Even with the Main Modifications proposed, the Local Plan will not meet the identified housing needs of the borough. If the review of the Local Plan is not submitted until 2022, for at least 3 years the borough will be operating with a Local Plan which does not meet the identified OAHN, this could have significant implications for the delivery of housing.	Our view remains, that Option 1 in the 'Inspector's Post Hearing Advice – Main Modifications and Related Matters' (paragraph 11) would be more appropriate. This would involve a robust review of the highway and transport evidence at this stage. This would ensure that when that the Local Plan is sound when it is adopted and would not require early review. If policy LPR1 is included point 3 the requirement should be for the allocation to sites to meet the OAHN should be the minimum.	Whether the Council review or suspends the Plan is a matter for the Council to decide and it is not part of the consultation on MMs. As concluded by the Inspector, the review provides an appropriate mechanism to address the small shortfall of less than a year's supply.
0930/M/02/C	Redrow Homes Ltd	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	The Local Plan review stage emphasis should be on locations which are best located in terms of access to sustainable modes of transport rather than on a distribution of development that is predominantly governed by highway capacity. New housing in the future in particular should be in the most sustainable locations and, where necessary, be accompanied by investment in sustainable transport infrastructure.  The Monitoring Local Plan policy would be helpful and more transparent if the programme for review could be more precise (for instance Quarter 1 of 2019 and Quarter 1 of 2022). The review will need to meet the housing OAN (to accord with NPPF, para 35a) but there is an opportunity to be more ambitious with greater emphasis for the locations of new housing placed on sites which can be linked to existing modes of sustainable travel and on the potential for investment to enhance sustainable transport. Highway constraints should be a secondary consideration.	Greater clarity on the programme for review (see Policy LPR1).	It is considered that Policy LPR1 provides sufficient certainty that a review will take place and provides an indication of timescales. It will be the role of a revised Local Development Scheme to provide the additional detail.



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0937/M/02/C	Bourne Leisure Ltd.	MM/006	Policy SP2 Sustainable Development	Point 4	Y	The modification which adds a new criterion to Policy SP2 which states "maximise the use of previously developed land "is endorsed and considered to be an appropriate strategy consistent with national policy. The change in market conditions and customer demands means it is important for existing sites to be able to adapt and change effectively.	None	Noted
0937/M/03/C	Bourne Leisure Ltd.	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4	Y	The amendment to Policy SP4 is consistent with the modification to Policy EP9 by referring to "holiday accommodation" rather than "extensions to holiday accommodation". Tourism plays a key role in the Wyre economy. It is important that a favourable approach to existing or new tourism development is given. The modification is consistent with national policy.	None	Noted
0937/M/04/C	Bourne Leisure Ltd.	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para 5.7.2 SP6	Y	The deletion of Policy SP6, Point 4 and the additional wording in para 5.7.2. to maintain the confidentiality of commercial information is endorsed. It is important to protect the commercial interests of applicants in order to ensure they are able to maintain their competitiveness and develop their businesses and thereby support the local economy. The tourism industry plays a key role in the Wyre economy. The modification is consistent with national policy.	None	Noted
0937/M/05/C	Bourne Leisure Ltd.	MM/014	Policy CDMP1 Environmental Protection	Point 1	Y	The modified wording to Point 1 (d) (ii) is endorsed to provide more stringent control over development which would result in, or contribute to, a deterioration in air quality. The Cala Gran site is in close proximity to a waste recycling centre so it is important for new development applications to take into full consideration any potential impact which poor air quality may have on existing leisure and tourism facilities and visitor accommodation. The modification is consistent with national policy.	None	Noted
0937/M/06/C	Bourne Leisure Ltd.	MM/043	Economy (8.9 Holiday Accommodation) and Policy EP9 Holiday Accommodation	8.9 EP9	Y	The amendment to Policy EP9 and title 8.9 is consistent with the modification to Policy SP4 by referring to "holiday accommodation" rather than "extensions to holiday accommodation". Tourism plays a key role in the Wyre economy. It is important that a favourable approach to existing or new tourism development is given. The modification is consistent with national policy.	None	Noted
0941/M/01/C	Gladman Developments Ltd	MM/006	Policy SP2 Sustainable Development		N	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.	Further modifications are required to ensure flexibility is built into the WLP in accordance with the presumption in favour of sustainable development. This is important to meet housing needs in full and positively respond to opportunities beyond settlement boundaries which may arise over the plan period and to assist in meeting its housing needs in full.	The settlement boundaries are not subject to a MM.
0941/M/02/C	Gladman Developments Ltd	MM/022	Housing (7.2 Housing Land Supply)		N	The Liverpool approach does not appear to be consistent with the requirements of national policy. The approach seems at odds with the approach to significantly boost the supply of housing to spread past housing delivery failure over a longer period into the future when it should have already been delivered. Furthermore, the Local Plan does not seek to meet full housing needs over the plan period. Any further delay in meeting unmet housing needs is failing to meet those households who need both market and affordable homes since the start of the plan period. There are households who need homes now and it is unreasonable to expect them to wait until later in the plan period when the housing should have already been delivered. The reference to the Liverpool method via modification is not considered to be justified given the previous shortfall in housing delivery that has already accumulated.	The Plan should make clear that the Sedgfield method be used for the purposes of calculating housing land supply to ensure housing shortfall is addressed as soon as possible.	The merits of the Liverpool vs Sedgfield approach was debated during the hearings and the Inspector has reached his conclusions having also considered all other relevant evidence.  No new matters are raised in this representation. There is sufficient land to meet the needs for at least the next five years when the revised Local Plan would have been adopted.
0941/M/03/C	Gladman Developments Ltd	MM/090	LPR1 Wyre Local Plan Review		N	Welcome the inclusion of MM/090 which requires a review of the WLP to meet its OAN in full.  The Council will be aware of the changes made to national policy with regards to the introduction of the standardised methodology for calculating housing needs. The standardised methodology represent a starting point as it only provides the base requirement and the minimum levels of housing need that is required. In undertaking a review of housing needs, the Council will need to consider the baseline need alongside its aspirations for economic growth and any unmet needs of neighbouring authorities through a statement(s) of common ground. Further, the standardised approach is under review by Government and is subject to further change.  Although the principle of undertaking a review is supported, the proposed wording does not require the authority to undertake a review resulting in the estimated time scales potentially slipping. The review should be carried out immediately upon adoption rather than waiting until the end of 2019.	The policy wording should be amended such as that proposed in the North West Leicestershire Local Plan which states:  The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed out of date. "	It is not considered appropriate or necessary to adopt the wording from the NW Leicestershire Local Plan. No information is provided to justify the wording of the policy. It is considered excessive to find the whole Local Plan and every policy therein as out of date because of slippage in the review programme. Such outcome does not serve to ensure that development needs are met in a sustainable way.

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0944/M/01/C	Applethwaite Ltd	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	Attention is drawn to the Inspectors Post Hearing Advice Note which states: 1. The failure to plan for enough new housing is a key concern; 2. The OAN is a robust figure and the Local Plan must do all it can to meet identified housing need; 3. Poulton is a sustainable and suitable location for housing growth ; 4. New housing delivery can be focused in sustainable locations with good public transport including Poulton. The increase to the site capacity from 154 to 300 dwellings of SA1/8 is welcomed but there is no explanation of what evidence the figure is based on and how it has been calculated. Each of the housebuilders with interest in SA1/8 has prepared a layout scheme illustrating the type and quantum of development and added together the total yield is higher than 300 dwellings. A sufficient quantum of development must be realised to provide the on and off site physical and community infrastructure to support the delivery of new housing. The Inspector notes that a larger number of houses would allow a greater contribution to the Poulton Highway Mitigation Strategy and off site sustainable transport measures. Extending the allocation would also accommodate sufficient land for a primary school. KDC1 of SA1/8 remains unchanged but Applethwaite believe the site can be delivered independently and does not need to be part of a masterplanning process.	It is requested that site allocation SA1/8 is extended so it has an overall site capacity of at least 500 dwellings.	The new yield of 300 was calculated using the same basic methodology as all other allocations but assumes a higher net developable area outside of the flood zone on the assumption that the flood zone will be the location of a significant amount of the green infrastructure. The capacity takes into account the need for a new school and car park and need to avoid housing in the area of Flood Zone 2 and 3. The Council has also taken into account the submitted indicative schemes which also cover land that is not allocated. The quantum of development on the indicative layouts relating to the allocation is less than 300, however a different dwellings mix and layout could increase the density and capacity of the site. The Inspector having considered all written and oral evidence, has not indicated to the Council in his Post Hearing Advice that consideration should be given to extending the boundaries of the site to accommodate additional development. The MM does not alter the Masterplanning requirements for the development of the site.
0944/M/02/C	Applethwaite Ltd	MM/003	Local Plan Strategy	Para 4.1.13	Y	Applethwaite strongly supports the modification which recognises the potential to maximise the use of sustainable transport modes in Poulton and the ability of the town to accommodate additional development above the limit set in the highway evidence.	None	Noted
0944/M/03/C	Applethwaite Ltd	MM/007	Strategic Policies (5.4 Green Belt)	Para. 5.4.2 Para. 5.4.4.	Y	Applethwaite strongly supports the addition of the paragraphs which provide a clear and improved explanation of why exceptional circumstances exist to justify the alteration of the green belt boundary at Poulton including the part of site allocation SA1/8. Applethwaite agrees that the land makes an important contribution to meeting the housing OAN in Wyre and if the land was not released from the green belt the shortfall in meeting the housing OAN would increase as there is no alternative site that could deliver equivalent housing capacity.	None	Noted
0947/M/01/C	J and R Parkinson	MM/066	SA1/17 Land South of Prospect Farm, Garstang		N	There is scope to enlarge the proposed allocation by including the adjoining land with a capacity of up to 50 no. dwellings. The Inspector considers the A6 highway constraint as overstated such as that additional growth can be supported at Garstang. The Plan is not sound as submitted and main modifications are needed to make it sound, the Inspector is clear in his Post Hearing Advice note that; 1. The failure to plan for enough new housing is a key concern; 2. The OAN is a robust figure and the Local Plan must do all it can to meet identified housing need; 3. Garstang is a sustainable and suitable location for housing growth; 4. New housing delivery can be focused in sustainable locations with good public transport including Garstang within the A6 Severe Restriction Zone. 5. There is scope for a 'modest increase' in housing growth in Garstang based on the current highway evidence base but this is not quantified as an additional number of houses beyond the proposed Main Modifications MM/066 and MM/065. We support the increase from 53 to 70 but there is an opportunity to increase to 120 dwellings. This differs to the approach taken in respect of SA1/16 and MM/065 where the allocation has been maximised. A further modification to MM/066 should be made as site SA1/17 is suitable for housing development, is available and can be delivered. Builders have expressed interested. This would enable the adopted Local Plan a greater proportion of the OAN to be delivered and reduce the unmet need to be deferred to the Local Plan Review.	It is requested that the boundary of the proposed housing site allocation SA 1/17 - Land south of Prospect Farm, west of the A6, Garstang is modified on the Policies Map to include the omitted land to the south (identified on the plan accompanying our representations in response to the Publication Draft Local Plan) as the residual frontage part of SHLAA site ref. GST_74.  The omitted land has a capacity of up to 50 no. dwellings which would increase the capacity of the modified allocation from 70 no. (per MM/066) to 120 no. dwellings.	The Inspector has not directed the Council to look at making additional allocations. This is a matter for the review of the Local Plan.
0953/M/01/C	Telereal Trillium	MM/003	Local Plan Strategy	Para. 4.1.9 Para. 4.1.16	Y	Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ	None	Noted.
0953/M/02/C	Telereal Trillium	MM/007	Strategic Policies (5.4 Green Belt)	Para 5.4.4	Y	Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ. However, the proposed wording of Paragraph 5.4.4 is incorrect as the outline planning permission is for mixed residential, retail / leisure and employment development and it does not prescribe the location of any of the permitted uses. The part of the site identified may therefore be developed for commercial use and not residential use.	Amend the last sentence of Paragraph 5.4.4 to read; "This parcel of land has outline planning permission for mixed use development."	<b>The Council supports providing further clarification at 5.4.4 that the outline planning permission is for mixed use, including residential. The Council suggest that a further amendment would be appropriate to state –</b> <b>"5.4.4. ... This parcel of land is part of an has outline planning permission for mixed use development, including residential development which contributes towards meeting the housing OAN"</b>

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0953/M/03/C	Telereal Trillium	MM/036	Economy (8.2 Employment Land Supply)	Table 8.2 Footnote 52	Y	Telereal Trillium and McDermott Homes fully support Footnote 52 of Table 8.2 which acknowledges and sanctions the net loss of the employment floorspace at Clarke House within the proposed site allocation SA1/11.	None	Noted.
0953/M/04/C	Telereal Trillium	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	Y	The current reserved matters application and Clarke House planning application propose 224 no. dwellings combined and further applications on the residual, excluding the part of the site which benefits from detailed planning permission for retail and leisure development, could deliver at least 14 no. further dwellings and potentially more than 90 no. units if sheltered housing / retirement apartments were delivered.	Whilst the Site Capacity is a minimum figure, the figure should be increased to 330 dwellings to take account of this potential.	The figure of 300 takes account of the indicative scheme submitted with the outline permission which shows 70 sheltered accommodation dwellings on the parcel of land released from the Green Belt. The figure also take account of the scheme submitted for reserve matters on the remainder of the site (excluding the land with planning permission for retail). It is not necessary to increase the figure as the 300 is a minimum and there is no certainty at this stage that 330 can be delivered. In fact the representor indicates above that the parcel of land released from the GB could be developed for non-residential uses under the existing outline permission.
0953/M/05/C	Telereal Trillium	MM/060	SA1/11 - North of Norcross Lane, Norcross	KDC6	Y	The current reserved matters application and Clarke House planning application propose 224 no. dwellings combined and further applications on the residual, excluding the part of the site which benefits from detailed planning permission for retail and leisure development, could deliver at least 14 no. further dwellings and potentially more than 90 no. units if sheltered housing / retirement apartments were delivered. Whilst the Site Capacity is a minimum figure, the figure should be increased to 330 dwellings to take account of this potential.  In addition, a minor further revision is required to KDC6 as the proposed wording is incorrect in light of the current planning and reserved matters applications and the consultation responses received from the local highway authority and Highways England, which both raise no objection to the proposed means of vehicular access to the proposed residential part of the site from the existing access on White Carr Lane.	Amend Site Capacity to read; 330 dwellings  Amend Site Delivery to read; (Planning reference 17/00268/OULMAJ)  Amend KDC6 to read; "New and/or retained accesses from White Carr Lane and Norcross Lane will be required."	In relation to the site capacity, see response above in relation to MM/049.  In relation to site delivery, planning application 17/00268/OUTMAJ received planning permission in April 2018 to vary four planning conditions associated with planning application 13/00200/OUTMAJ. The site delivery commentary should only refer to the outline planning permission (13/00200/OUTMAJ) that covers the majority of the site, reference to a subsequent permission that varies four of its planning conditions is not considered necessary as they do not materially alter the extent of the planning permission.  KDC6 does not inhibit access from White Carr Lane in addition to Norcross Lane. <b>Following subsequent planning applications for residential development that agreed access to the residential development, KDC6 is superfluous and the Council proposes a further amendment to delete KDC6.</b>
0953/M/06/C	Telereal Trillium	MM/101	Policies Map - SA1/11 - North of Norcross Lane, Norcross		Y	Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ	None	Noted.
0962/M/02/C	Metacre	MM/062	SA1/13 Inskip Extension		Y	The proposed main modification would help to deliver the borough's housing needs in a positive and sustainable manner. Initial survey work on the amended allocation demonstrates that the proposed number of dwellings can be delivered whilst avoiding the pipeline (INS_07) and area of flood risk.	n/a	Noted.
0962/M/03/C	Metacre	MM/079	SA3 Mixed Use Development		N	Additional highway assessments undertaken as part of planning applications may demonstrate that additional housing can be delivered within an allocation boundary. This being the case, it would be unjustified to limit the capacity of allocations to the "total" identified in the table. Site capacity is a technical issue to be considered on a site by site basis. Plan wording should be more flexible to allow more houses to be delivered where acceptable and subject to local plan policies and material considerations.	Change "Total Site Capacity" to "Anticipated Delivery". It should be clarified that the identified capacity is not a ceiling to development.	The terminology "Total site capacity" is not subject to a Main Modification.. Modification MM/005 makes it clear that the housing delivery of 9,285 dwellings over the plan period is a "minimum". Hence site capacities may be greater than shown in the plan depending on the relevant material considerations.
0962/M/04/C	Metacre	MM/082	SA3/3 Land West of Great Eccleston	KDC7	N	Allocation fully supported, but two concerns: 1) the terminology of "site capacity" should be more flexible to allow for a greater number of dwellings to come forward where acceptable. 2) the requirement for home owner packs in unnecessarily onerous given the distance between the site and Morecambe Bay, with no direct link.	Change "Total Site Capacity" to "Anticipated Delivery". It should be clarified that the identified capacity is not a ceiling to development. Delete reference to home owner packs.	The terminology "Total site capacity" is not subject to a Main Modification. Modification MM/005 makes it clear that the housing delivery of 9,285 dwellings over the plan period is a "minimum". Hence site capacities may be greater than shown in the plan depending on the relevant material considerations.  The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217).
0963/M/02/C	Strategic Land Group	MM/054	SA1/5 South East Poulton, Poulton-le-Fylde	KDC5	N	Draining into a watercourse is encouraged under the Sustainable Drainage Systems (SuDS) hierarchy. However, the policy as drafted does not reflect the specific conditions of the site (i.e. the lowest parts/levels of the site). To achieve a drainage solution which discharges solely into the watercourses could require a significant increase in levels adjacent to these properties which may not be acceptable for other urban design reasons.	To ensure the policy provides sufficient flexibility for this to be taken into account in the design of any development, while still ensuring that the SuDS hierarchy is reflected in the design, we would proposed that the words "...where possible" should be added to the end of the first sentence of Key Development Statement 5. For clarity, the resultant policy would therefore read: "Residual surface water run-off should drain into the river Wyre via Oldfield Carr Lane watercourse and Main Drain where possible."	The requirement for the development to drain into the watercourse (KDC 5 in the 'Publication' draft) is subject to an MM and therefore the comment is not a valid comment on the MMs.  Any deviation from the policy is possible but it would need to be justified. The proposed amendment is not necessary and could be viewed as watering down the policy. The developer should maximise the opportunities for draining into the watercourse and then other options in line with the hierarchy set out in Policy CDM2 in order to properly drain a site in a sustainable manner.

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0987/M/02/C	Elaine Deegan	MM/003	Local Plan Strategy	Para. 4.1.11 and table (Appendix E)	N	Object strongly to the following sentence: It has taken account of other evidence such as flood risk as well as the sustainability of different places. With regards to the latter the Local Plan includes specific requirements as part of allocations for the provision of infrastructure to support the scale of proposed development in different settlements.	Request a revised wording as follows: It has taken account of some other evidence such as flood risk as well as the sustainability of selected settlements.  The remaining text should be deleted as it does not reflect the Planning Inspector's views such as the constraints in Inskip he refers to.  Amend table (new appendix E) to reflect a suggested reduction in supply in Inskip to 82 houses (20 built 2011-2018 and 62 with planning permission).	It is factually the case that the Local Plan has taken into account flood risk and the sustainability of all settlements in developing the local plan strategy. This has been evidenced in documents such as the Strategic Flood Risk Assessment (ED110, ED111, ED112 and ED113) and Settlement Study (ED114 AND ED115).  The amendment to paragraph 4.1.11 is accurate and appropriate. The suggested amendment is incorrect as it ignores land without planning permission.	
0987/M/03/C	Elaine Deegan	MM/062	SA1/13 Inskip Extension		N	In relation to the allocation of SA1/13 at Inskip: <b>Not positively prepared</b> - there is no agreement with adjoining Fylde authorities on housing needs. The proposed development of 70 dwellings to the south of Inskip village is unsustainable due to the lack of infrastructure, services and facilities as confirmed by the Planning Inspector in his July 2018 Advice Note. <b>Not Justified</b> - the approach to Inskip taken in the MMs reflects a lack of any strategy, a failure to propose any reasonable alternatives to the new site allocation proposed for 70 homes and is based on no further evidence other than that considered at the examination and there rejected by the Inskip community then confirmed by the planning Inspector in his Advice Note. <b>Not effective</b> - there has been a failure of Wyre Council and adjoining Fylde area councils to agree over a period of many years about housing land supply issues and other matters including the priority for strategic investment in infrastructure, services and facilities across the Fylde peninsula which has not resulted in effective plan making or decision making. The issues have been well documented in the Local Plan process and show a failure to comply with this requirement. <b>Not consistent with national policy</b> - The Plan should enable delivery of sustainable development in accordance with policies in the framework (NPPF 2018). In the case of Inskip, The Planning Inspector in his July 2018 Advice Note identifies a number of adverse impacts that would arise from this allocation and that cumulatively these adverse impacts indicate that the scale of allocations would be too large. We would agree with his comments in full and would request the Borough Council to do likewise. <i>[continued on the next line]</i>	Amend the allocation capacity to reflect existing permitted schemes (82 dwellings).  Amend Site Description to read: "The allocation consists of three parcels of agricultural land in a flat topography – to the west of the village."  Amend Key Development Consideration 1 to read: Development is limited to a total of 82 dwellings in Inskip due to recognised Planning constraints. The housing allocation comprises land to the west of the village in accordance with an extant planning permission under course of construction. The three parcels should be considered as a single site to be brought forward in line with a masterplan to be produced covering the whole allocation. The masterplan must be agreed by the local planning authority prior to the granting of planning permission for any part of the site. The land immediately to the west of the school should only be used for an extension to the primary school. The development should incorporate an appropriate and dedicated access to the farm to the south and south-east of the School.  Omit any reference to the village green or its siting.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply. The site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development. This representation provides no new evidence to suggest that development of the Dead Dam Bridge site would be inappropriate. The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either site of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest".  The capacity of the Dead Dam Bridge portion of the allocation was calculated using the same methodology as other allocations in the Local Plan and assumes no housing is built in the Flood Zone.  <i>[continued on the next line]</i>	
						<b>0987/M/03/C continued</b> The proposed allocation is out of scale with the existing village and does not reflect the Inspector's Advice that any allocation should be modest. The allocation of land at Dead Dam Bridge is not a specific modification requested by the Inspector (it is outside of the scope of his suggested Main Modifications and therefore of questionable legality), it has not been subject to community consultation, and is contrary to the constraints identified by the Inspector. There is no evidence demonstrating how the figure of 70 extra dwellings has been derived.  Village green - the local plan should not be specific in directing that the village green should be located at the northern end of the village.	see above	<b>0987/M/03/C continued</b> The Local Plan is not specific as to the location of the village green which is a matter for the masterplan. The Council considers that a small village green is still appropriate and reference should not be omitted as suggested by the representor.	
0987/M/04/C	Elaine Deegan	MM/005	Policy SP1 Development Strategy		N	Reduce the Inskip allocation to 82 dwellings.	Amend figures in text and tables to reflect the suggested reduction in the Inskip allocation to 82 dwellings.	The council do not accept that the modified allocation at Inskip should be further amended.	
0987/M/05/C	Elaine Deegan	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Reduce the Inskip allocation to 82 dwellings.	Amend figures in text and tables to reflect the suggested reduction in the Inskip allocation to 82 dwellings.	The council do not accept that the modified allocation at Inskip should be further amended.	

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0995/M/002/C	Paul Desborough, IRAG	MM/062	SA1/13 Inskip Extension		N	Revised allocation is not in accordance with the Inspector's Main Modification at para. 31 of his Advice which calls for a modest allocation based on existing permissions. Allocation of 155 dwellings is a two thirds increase in the size of the village. The 27 already under construction brings the figure to 182 - a 77% increase in the housing stock. These figures are not "modest" and will leave the Inspector's concerns intact. Although the Inspector invites the council to consider the allocation of INS_07, this not a recommended Main Modification from the Inspector. Wyre council have taken this suggestion and interpreted it in an unacceptable and misleading way which might be illegal. The allocation of 70 dwellings is not "modest" and there is no justification as to its appropriateness for the village. It has been introduced in haste without full consideration of the circumstances and history of the site which was put forward to Wyre council by the Parish council as a key community resource (attachment included). No consultation has taken place. Has been imposed out of the blue. It is a major change not subject to public examination.	Delete INS_07. The Parish Council and local community should be consulted as to the best value use for the site. The Parish Council's Vision should be reinstated. Amend site capacity to reflect the existing residential permissions. Amend the site description and KDC 1 to refer to three parcels. Amend KDC9a and no longer relevant as it applies to the deleted part of the allocation and KDC9d which relates to the area (INS_07) suggested for deletion.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The Inspector asked the Council to consider this site in light of his conclusions about Inskip. The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either site of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest". The Dead Dam Bridge site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development. Furthermore the additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply. The inclusion of site INS-07 in the allocation is part of MM/062 and hence is subject to the MM public consultation. The Council does not consider that new issues have been raised in relation to allocation of INS_07 to warrant debate at hearing sessions. <b>The council accepts that KDC9a has been included in error and should be deleted as it no longer impacts on the allocation as proposed to be modified.</b>
0995/M/03/C	Paul Desborough, IRAG	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Amend table after 9.2.3 to reflect a suggested 55 dwelling capacity for Inskip resulting from the deletion of INS_07.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
0995/M/04/C	Paul Desborough, IRAG	MM/003	Local Plan Strategy	Para. 4.1.11 and table (Appendix E)	N	Amend new Appendix E to reflect suggested changes to SA1/13 (i.e. the deletion of INS_07).	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
0995/M/05/C	Paul Desborough, IRAG	MM/102	Policies Map SA1/13 Inskip Extension		N	Amend settlement boundary to reflect suggested deletion of INS_07 from the allocation.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
0995/M/06/C	Paul Desborough, IRAG	MM/005	Policy SP1 Development Strategy		N	Amend table to reflect the deletion of INS_07.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
1015/M/02/C	Philip James	MM/062	SA1/13 Inskip Extension		N	Proposed 155 dwellings does not accord with the Inspector's advice for a "modest" increase. Is in addition to 27 already approved. Lack of or limited social and public transport infrastructure. Lack of employment opportunities. Forcing people to travel by car.	The 55 dwellings approved is sufficient - enough is enough. There should be more robust protection for land for education purposes abutting St Peter's school - protection should extend to land immediately east of the school. The school is a vital part of village life the protection of which in the short and long term should not be underrated or undermined.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The Inspector asked the Council to consider this site in light of his conclusions about Inskip. The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either site of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest".  The provision for a new school at Inskip (KDC7) has not been amended by MM/062
1058/M/02/C	Barbara Sumner	MM/065	SA1/16 West of Cockerham Road, Garstang		N	I support the building of a new school but have concerns regarding its access and surrounding traffic issues. 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. This will create a potentially hazardous traffic situation as this junction is already very busy and will only get worse with new development, especially at peak times.	The solution to this traffic problem is to use the proposed roundabout from the adjacent development 'Land West of A6 16/00241/OULMAJ' as an access route to the new school. 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 preventing further congestion turning right at the Cockerham/ Croston Road traffic light junction	The comments are not sufficiently specific to the change proposed by the Main Modification. A new school was proposed on this site in the 'publication' draft Local Plan. An appropriate access to the new school will be determined as part of the Masterplanning process for the site and it is a consideration that could be raised in relation to the Masterplanning process for site SA3/5. It should be noted that the A6 Corridor Highway Mitigation Strategy includes improvements to the Cockerham / Croston Road traffic light junction (initiative 2).
1059/M/02/C	Jane Readman	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	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.	1) Road congestion and danger 2) GP 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.	The comments are not sufficiently specific to the change proposed by the Main Modification.

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1060/M/02/C	Carrick Sports Ltd	MM/003	Local Plan Strategy	N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings. The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive. 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 (see table submitted with the representation). 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. 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. 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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>	
1060/M/03/C	Carrick Sports Ltd	MM/004	Strategic Policies (5.1 Introduction)	N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>	

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1060/M/04/C	Carrick Sports Ltd	MM/005	Policy SP1 Development Strategy		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>
1060/M/05/C	Carrick Sports Ltd	MM/021	Housing 7.1 Introduction		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. 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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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. 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RESPONSES TO THE MAIN MODIFICATIONS

Table 5a- Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Unique Reference Order)

Unique Ref	Name/ Organisation	Mod Ref	Part of Plan	Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
1060/M/06/C	Carrick Sports Ltd	MM/022	Housing (7.2 Housing Land Supply)	N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. 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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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. 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1060/M/07/C	Carrick Sports Ltd	MM/023	Policy HP1 Housing Land Supply	N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. 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## RESPONSES TO THE MAIN MODIFICATIONS

Table 5a- Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Unique Reference Order)

Unique Ref	Name/ Organisation	Mod Ref	Part of Plan	Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
1060/M/08/C	Carrick Sports Ltd	MM/048	Site Allocations (9.2 Residential Developments)	N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>
1060/M/09/C	Carrick Sports Ltd	MM/089	Monitoring the Local Plan	Y	Support for the proposed early local plan review but cautions against using the current standard methodology which may be amended by the government.	Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.	<p>As part of the immediate review the council will consider government guidance relating to the calculation of housing need extant at the relevant time.</p> <p>The proposed site at Calder House Lane has not been considered through the examination process and is not the subject of a modification. It is therefore inappropriate to consider its allocation at this stage.</p>
1060/M/010/C	Carrick Sports Ltd	MM/090	LPR1 Wyre Local Plan Review	Y	Support for the proposed early local plan review but cautions against using the current standard methodology which may be amended by the government.	Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.	<p>As part of the immediate review the council will consider government guidance relating to the calculation of housing need extant at the relevant time.</p> <p>The proposed site at Calder House Lane has not been considered through the examination process and is not the subject of a modification. It is therefore inappropriate to consider its allocation at this stage.</p>

WYRE LOCAL PLAN								
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Table 5b - Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Main Modification Reference Order)								
Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0808/M/02/C	Story Homes	MM/001	Introduction (1.1 Introduction)		Y	Support modification	None	Noted.
0032/M/01/C	Blackpool Council	MM/002	Introduction (1.4 The Duty to Cooperate)	Para. 1.45 Para. 1.47	N	<p>The modified text set out in MM/002 gives the impression that a plan review may be secondary to a further request for assistance from neighbouring authorities. New paragraph 1.4.5 in MM/002 states that "A duty to cooperate meeting was held on 14 November 2017 with all adjoining authorities. It was agreed that adjoining local authorities will consider if and how they can assist Wyre with the housing shortfall once the quantum of the shortfall has been agreed through the Wyre Local Plan examination." This is not a position that Blackpool agreed to at this meeting. At the meeting it was agreed that the issue of Wyre's OAN and any shortfall would be addressed through the examination process and that Blackpool (and Fylde) would put their views forward as such. We do not consider the OAN figure of 479 to be justified and dispute some of the assumptions made that restricted housing capacity over the plan period.</p> <p>We do not consider new paragraph 1.4.7 in MM/002 is needed because amended paragraph 1.4.5 (beginning "The Duty to Cooperate Statement sets out...") summarises the situation with regard to the Duty to Cooperate. In addition, as set out in our representations to the Publication Draft Local Plan (paragraphs 2.5 – 2.9) we had some concerns about the timing of the provision of evidence to support Wyre's approach, which is not reflected in the text in new paragraph 1.4.7.</p> <p>Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.</p>	<p>The primary focus in both MM/002 and MM/003 should be on the review mechanism. We suggest that new paragraph 1.4.5 in MM/002 is deleted.</p> <p>Acknowledge that a review of local housing need may be required to reflect this change to national policy.</p>	<p>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 OAN housing figure. He refers to the figure of 479 as the OAN. The Inspector has considered the arguments advanced by Blackpool. The comments on the OAN do not relate to a MM. Adjoining local authorities are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks.</p> <p>Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other duty to cooperate actions. Wyre maintains that paragraph 1.4.5 reflects what was discussed at the 14 November 2017. Following months of disagreement about the OAN and the 'shortfall' it was agreed that these are matters for the Wyre Local Plan examination.</p> <p>Paragraph 1.4.5 is correct and reflects the statement in the recently adopted Fylde Local Plan at paragraph 1.27- "Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development."</p> <p>New paragraph 1.4.7 is appropriate and refers to the Wyre's efforts under the Duty to Co-operate with regards to the housing shortfall. The detail of these efforts is more appropriately covered in the Statement of Compliance with the Duty to Co-operate.</p> <p>It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.</p>
0290/M/01/C	Fylde Council	MM/002	Introduction (1.4 The Duty to Cooperate)	Para 1.4.5 Para. 1.4.6 Para. 1.4.7	N	<p>Paragraphs 1.4.5 to 1.4.8 as proposed for modification give the clear impression that the review would be secondary to a (further) request for assistance in meeting unmet housing need outside Wyre. This is not justified.</p> <p>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.</p>	<p>Paragraph 1.4.5 should be deleted. The wording to paragraph 1.4.7 should remove the first part of the sentence: "Although...provided for," and should begin with "The Duty to Cooperate Statement..." The last two sentences of that paragraph should be removed altogether. Paragraph 1.4.8 should be revised to read "...which brought the housing land supply closer to the identified housing OAN within the OAN range indicated by the evidence. However due to the outstanding shortfall-deficiency and the existing position that no adjoining authority is able to assist Wyre in meeting unmet needs, the Local Plan includes a review mechanism..." This last sentence only need remain at all if the Inspector still considers that the OAHN is not met.</p>	<p>Adjoining LAs are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks. Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other Duty to Co-operate actions. The amendments made under MM/003 do not give the impression that the commitment for immediate partial review is secondary to another action. Therefore the amendments introduced in MM/003 remain appropriate.</p> <p>It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.</p>
0297/M/01/C	Home Builders Federation	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to insert new paragraphs in relation to the Duty to Cooperate, the OAN and the Local Plan Review adds clarity and is beneficial.	n/a	Noted.
0343/M/01/C	Highways England	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	Highways England is supportive of the Inspector's suggestion that the new Local Plan be subject to early review. Highways England wishes to be involved with this process, and will be happy to assist the Council through the provision of knowledge and existing modelling information relating to the bypass scheme and the operation of the wider strategic road network within the area likely to be affected by the Local Plan.	None.	Noted.

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Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0363/M/02/C	Jessica Bond, Taylor Wimpey UK Limited	MM/002	Introduction (1.4 The Duty to Cooperate)		N	Whilst the Council's evidence base seeks to demonstrate that it has effectively cooperated with adjoining authorities, TW disagrees with this assertion and has concerns over the effectiveness of the cooperation during the early stages of plan preparation. This limited engagement with neighbouring authorities has not enabled Wyre to meet its unmet need within the housing market areas [HMA]. Notwithstanding, TW acknowledges the Inspector's decision and is generally supportive of building an early review mechanism into the Local Plan to enable the Council to meet its unmet need provided it is carried out at the appropriate time. TW has concerns that commencing the partial review so soon after the adoption of the Local Plan is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the Local Plan and forecasts a realistic timetable for the preparation of a review. Furthermore, in preparing the review of the Local Plan, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy. Overall, TW has some concerns regarding the effectiveness of MM/002 on the premise that the Council has failed to cooperate effectively with adjoining authorities. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the current Local Plan which has been time expired since 2006.	A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review too soon after the adoption of the Local Plan; Additional text should be provided with MM/002 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.	The Council's compliance with the Duty to Co-operate 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 review 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 LAs with regards to the shortfall of unmet need. The scope of the review is set out in new Policy LPR1. The DtC will apply to the review of the Local Plan.
0545/M/01/C	Garstang Town Council	MM/002	Introduction (1.4 The Duty to Cooperate)		N	There is no mention in the schedule of Main Modifications of any movement since 14 November 2017 demonstrating that Lancaster or Preston are prepared to assist towards meeting the Councils housing needs. On the contrary it is likely that Wyre is informally assisting its neighbouring cities.	n/a	As indicated in MM/002 paragraph 1.4.5 the outcome of the last meeting was to await the confirmation of the housing figure and any shortfall through the Wyre Local Plan examination. There have not been any further DtC meetings on this matter. The Council will need to comply with the DtC requirement through the review of the Local Plan.
0808/M/03/C	Story Homes	MM/002	Introduction (1.4 The Duty to Cooperate)	Para. 1.4.8	Y	Support inclusion of para 1.4.8 committing the Council to early review and Submission of partial review by early 2022	None	Noted.
0930/M/02/C	Redrow Homes Ltd	MM/002	Introduction (1.4 The Duty to Cooperate)		Y	The Local Plan review stage emphasis should be on locations which are best located in terms of access to sustainable modes of transport rather than on a distribution of development that is predominantly governed by highway capacity. New housing in the future in particular should be in the most sustainable locations and, where necessary, be accompanied by investment in sustainable transport infrastructure.  The Monitoring Local Plan policy would be helpful and more transparent if the programme for review could be more precise (for instance Quarter 1 of 2019 and Quarter 1 of 2022). The review will need to meet the housing OAN (to accord with NPPF, para 35a) but there is an opportunity to be more ambitious with greater emphasis for the locations of new housing placed on sites which can be linked to existing modes of sustainable travel and on the potential for investment to enhance sustainable transport. Highway constraints should be a secondary consideration.	Greater clarity on the programme for review (see Policy LPR1).	It is considered that Policy LPR1 provides sufficient certainty that a review will take place and provides an indication of timescales. It will be the role of a revised Local Development Scheme to provide the additional detail.
0032/M/02/C	Blackpool Council	MM/003	Local Plan Strategy		N	The modified text set out in MM/003 gives the impression that a plan review may be secondary to a further request for assistance from neighbouring authorities. Amended paragraph 4.1.21 of MM/003 which before making any reference to the partial review mechanism states that "The Council is committed to on-going engagement with adjoining local authorities with regards to meeting the shortfall outside Wyre in adjoining local authorities. This is a matter of consideration for the Local Plans of adjoining local authorities". This text is not required.  MM/003 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.  Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.	The primary focus in MM/003 should be on the review mechanism. Delete suggested additional text to para. 4.1.21 beginning "The council is committed.....".  Delete reference to meeting 97% of the OAN.  Acknowledge that a review of local housing need may be required to reflect this change to national policy.	Adjoining LAs are required to consider any requests for assistance in establishing their Local Plan housing requirements under both the 2012 and 2018 National Planning Policy Frameworks. Wyre Council is committed to an immediate partial review of the Local Plan with a clear timetable. This is not a matter of priority with regards to other duty to cooperate actions. Wyre is required to engage with adjoining local authorities regarding the shortfall through the Duty to Co-operate requirements. The inserted text in paragraph 4.1.21 is correct and appropriate. The review is referred to in new paragraph 4.1.22. The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls. MM /003 relates to the Local Plan Strategy and therefore a focus on the review is not appropriate. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.

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0051/M/02/C	Robert Fail, Wyre Labour Group of Councillors	MM/003	Local Plan Strategy	Para. 4.1.11	N	The modification to para 4.1.11. suggests that the necessary infrastructure for the scale of housebuilding proposed is being provided but this is not the reality of the situation. The A585 and other roads in Fleetwood and Thornton Cleveleys will be severely impacted by the plan and the proposed Mains Lane bypass and future junction alterations at Norcross and Cleveleys will do nothing to address the issue.. The employment, commute and congestion issues are not being addressed, they will make the problems worse and this will deter new employers. The plan does not provide the employment for the projected population increase.	Altering para 4.1.11. will have little effect. A major modification is required based on a fundamental change of strategy to deliver a transport infrastructure and economic growth to Wyre as a prelude to housing.	The matters raised against MM/003 are not new matters and have been considered as part of the examination process previously. The Council is committed to an immediate partial review of the Local Plan which will include a review of transport and highway issues.
0290/M/02/C	Fylde Council	MM/003	Local Plan Strategy		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.  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.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%. The need for the local plan review to accord with the new standard methodology should be acknowledged within the modifications.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0297/M/02/C	Home Builders Federation	MM/003	Local Plan Strategy	Para. 4.1.21	Y	Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to paragraph 4.1.21 in relation to a commitment to ongoing engagement is valuable. The commitment to an early review and therefore the modification to paragraph 4.1.21 is also supported.	n/a	Noted.
0343/M/02/C	Highways England	MM/003	Local Plan Strategy		Y	We note that the planned housing and employment growth levels and distribution to be delivered during the Plan period is observed to be significant (equating to an increase of 1061 residential units, which equates to a rise of 11%). However, this increase is observed to be reasonable in the context of the requirement for the Council to increase its OAHN target for the plan period.	None.	Noted.
0545/M/03/C	Garstang Town Council	MM/003	Local Plan Strategy	Para 4.1.11	N	It is disputed that the strategy is "managed"; it is expedient or more colloquially trying to pour a quart into a pint pot. It does not sit easily with the Vision Statement. The strategy envisages that an essential characteristic is the multiplicity of settlements each with its own identity. This historic environment contributes to the character of the place and fosters community spirit. Nobody could disagree with this aspiration but the reality of heavy development increased by the Modifications does not sit easily with it and is unlikely to receive public approval.	n/a	Noted. Comments are not specific to a MM/003. Paragraph 4.1.11 clarifies the strategy. The terms 'manage' adds clarity to the document.
0645/M/01/C	Nether Wyresdale Parish Council	MM/003	Local Plan Strategy	Para. 4.1.4 Para. 4.1.11 Para. 4.1.25	N	Para. 4.1.5 - This part of the modification is generally supported however, in the last line the Parish Council would like to see a stronger reference/addition to those aspects that contribute to settlement identity expanded. 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. The importance of setting could be considered in the case of individual settlement studies be carried out in the future. In addition the issue of setting can also be a material consideration in assessing the potential impact of development on heritage assets in which countryside can play an important and integral part of such consideration.  Para. 4.1.11 - Expand the policy wording to refer to other important material planning considerations affecting the appropriate locations for development as proposed within the plan.  Para. 4.1.25 - Modification supported but would add a reference to the countryside.	Para. 4.1.5 - the last line should be modified to read "protects the overall character of Wyre and in many cases is an important factor in providing the identity, character and landscape setting of individual settlements".  Para. 4.1.11 - amend wording to read - "The Council has not based the strategy solely on the highways evidence albeit that was a major consideration. It has taken account of other evidence including issues of flood risk, the locational sustainability of existing settlements to accommodate development, the need to protect the intrinsic value of countryside landscapes and the character and setting of individual communities. With regard to the latter.....".  Para. 4.1.25 - add.... 'Countryside designation' after "The Green Belt.....".	<b>It is noted that this representation appears to relate to para. 4.14 not 4.1.5.</b> The Council does not support the amendment as supported. It is not concise and clear. <b>However it would not object to the addition of 'character and landscape setting of individual settlements' so that the sentence would read "... Protects the overall character of Wyre, the identity of separate communities and the character and landscape setting of individual settlements" if the Inspector considers it improves clarity.</b>  The suggested amendments to paragraph 4.1.11 are not considered necessary and do not add anything to the plan.  The suggested amendment to paragraph 4.1.25 is not considered necessary.

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0794b/M/02/C	Wainhomes	MM/003	Local Plan Strategy		N	<p>Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full.</p> <p>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.</p> <p>An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full.</p> <p>The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.</p>	See summary.	The shortfall amount to less than a year's supply over the period to 2031 and will be addressed through the immediate review of the Local Plan. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representer provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0808/M/04/C	Story Homes	MM/003	Local Plan Strategy	Para. 4.1.11 Para. 4.1.18	N	<p>Object to Council's continued reference to transport, flooding and a 'managed dispersal' strategy as proposed in para 4.1.11. Clear from Post Hearing advice that LCC Report (ED094a) is high-level desktop assessment and does not robustly model how new transport infrastructure could cost effectively limit the significant impact of development. Para 9 states 'managed dispersal' strategy is likely to increase reliance on private vehicle and longer distance travel. LCC report not sound basis upon which to base a Development Strategy.</p> <p>Inspector's note is clear that flood risk not an overriding concern.</p> <p>Seek clarification at para 4.1.18 and inserted appendix E, housing requirements are minimums and not capped totals.</p>	Appendix E column "total" should be replaced with "Minimum Expected Number of New Homes in Each Settlement" given that housing requirements are minimums and not capped totals.	The strategy remains a 'managed dispersal' strategy 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.  Appendix E is not a new table but an updated version of the table previously following paragraph 4.1.18. The table in Appendix E is for information. It is clear in policies SP1 and HP1 that housing figures are a minimum.
0944/M/02/C	Applethwaite Ltd	MM/003	Local Plan Strategy	Para 4.1.13	Y	Applethwaite strongly supports the modification which recognises the potential to maximise the use of sustainable transport modes in Poulton and the ability of the town to accommodate additional development above the limit set in the highway evidence.	None	Noted
0953/M/01/C	Telereal Trillium	MM/003	Local Plan Strategy	Para. 4.1.9 Para. 4.1.16	Y	Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ	None	Noted.
0987/M/02/C	Elaine Deegan	MM/003	Local Plan Strategy	Para. 4.1.11 and table (Appendix E)	N	Object strongly to the following sentence: It has taken account of other evidence such as flood risk as well as the sustainability of different places. With regards to the latter the Local Plan includes specific requirements as part of allocations for the provision of infrastructure to support the scale of proposed development in different settlements.	<p>Request a revised wording as follows: It has taken account of some other evidence such as flood risk as well as the sustainability of selected settlements.</p> <p>The remaining text should be deleted as it does not reflect the Planning Inspector's views such as the constraints in Inskip he refers to.</p> <p>Amend table (new appendix E) to reflect a suggested reduction in supply in Inskip to 82 houses (20 built 2011-2018 and 62 with planning permission).</p>	It is factually the case that the Local Plan has taken into account flood risk and the sustainability of all settlements in developing the local plan strategy. This has been evidenced in documents such as the Strategic Flood Risk Assessment (ED110, ED111, ED112 and ED113) and Settlement Study (ED114 AND ED115).  The amendment to paragraph 4.1.11 is accurate and appropriate. The suggested amendment is incorrect as it ignores land without planning permission.
0995/M/04/C	Paul Desborough, IRAG	MM/003	Local Plan Strategy	Para. 4.1.11 and table (Appendix E)	N	Amend new Appendix E to reflect suggested changes to SA1/13 (i.e. the deletion of INS_07).	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.

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1060/M/02/C	Carrick Sports Ltd	MM/003	Local Plan Strategy		N	The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings. The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive. 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 (see table submitted with the representation). 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. 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. 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 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.  Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.	The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply. Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.
0032/M/03/C	Blackpool Council	MM/004	Strategic Policies (5.1 Introduction)		N	MM/004 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.	Delete reference to meeting 97% of the OAN.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.
0290/M/03/C	Fylde Council	MM/004	Strategic Policies (5.1 Introduction)		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach.
0297/M/03/C	Home Builders Federation	MM/004	Strategic Policies (5.1 Introduction)		Y	The HBF are supportive of the proposed amendment and the increase in the proportion of provision of the housing OAN.	n/a	Noted.
0363/M/03/C	Jessica Bond, Taylor Wimpey UK Limited	MM/004	Strategic Policies (5.1 Introduction)		N	Supports the measures that have been incorporated in the plan by virtue of the MM to enable the Council to meet the majority of its housing OAN, it has concerns regarding the remaining unmet need. As set out in the response to MM/002, TW supports the Inspector's recommendation to build in an early review mechanism, to enable it to meet its unmet need. TW strongly recommends that additional text is included within MM/004, which set out that the Council will commit to an early review to ensure that it able to meet its unmet need. As part of the review, the Council will seek to engage with authorities in the HMA and will carry out a robust and effective duty to cooperate to ensure it is able to meet its unmet need. The Local Plan has not been positively prepared, because it does not seek to meet the full housing OAN. 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.	Additional text should be input into MM/004 which sets out that the Council will commit to an early review, and that it will seek early engagement opportunities with the HMA through a robust and effective duty to cooperate to ensure it is able to meet its unmet need.	The Council's commitment to an immediate review is set out in policy terms (Policy LPR1). There is no need for any further text. The review will need to comply with DfC requirements. Comments regarding the Council's compliance with the DfC are not relevant to the MMs. The Council's compliance with the DfC was considered at the hearing sessions and the Inspector has not raised any issues.
0545/M/04/C	Garstang Town Council	MM/004	Strategic Policies (5.1 Introduction)	Para 5.1.1	N	The provision of development in the A6 corridor is increased but little attempt at providing high technology employment which will retain the workforce in Wyre.	n/a	The comment does not relate to MM/004. The increase of development along the A6 is not significant that would require further employment allocations.

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0794b/M/03/C	Wainhomes	MM/004	Strategic Policies (5.1 Introduction)		N	<p>Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full.</p> <p>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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.</p>	See summary.	The shortfall amount 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. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review. [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
1060/M/03/C	Carrick Sports Ltd	MM/004	Strategic Policies (5.1 Introduction)		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply. Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.
0297/M/04/C	Home Builders Federation	MM/005	Policy SP1 Development Strategy		Y	The HBF are generally supportive of the proposed modification to Policy SP1, point 3, including the addition of 'a minimum' and the increase in the housing requirement.	n/a	Noted.
0343/M/03/C	Highways England	MM/005	Policy SP1 Development Strategy		Y	A noteworthy observation is the reduction of 305 dwellings dispersed throughout the small rural settlements which is offset by a larger increase in the Urban Towns (146) and in Garstang itself (196 dwellings). The increase in Garstang is itself substantial due to existing issues associated with the cumulative level of proposed growth along the A6 corridor and the overall impact on the SRN itself (M6 Junction 33 and/or M55 Junction 1). Although the A585 provides accessibility to the Urban Towns where an increase in both housing and employment has been proposed, the relatively small scale of development is unlikely to significantly impact the operation of the SRN due to the expectation of trips also being dispersed throughout the local road network.	None.	Noted.
0473/M/02/C	Mr P Barnett	MM/005	Policy SP1 Development Strategy		N	Although the modification increases the housing requirement by over 1,000 additional dwellings, there is still a significant shortfall against the OAHN of 295 households. This has to be seen in the context of significant affordable housing needs and a significant need for older persons housing.	Proposes a new residential allocation at Catterall for retirement village of some 200 houses (plans attached to representation).	The Inspector has not directed the Council to make additional allocations. Furthermore, the suggested site was not proposed at Publication Draft Local Plan stage and it is not an omission site. The representation does not make valid comments on the proposed MMs.

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0545/M/05/C	Garstang Town Council	MM/005	Policy SP1 Development Strategy		N	States that new build development will take place within, existing, settlement boundaries. The increase of dwellings will automatically extend settlement boundaries until the draft plan is produced in the next decade. We wish to see evidence that settlement boundaries have not been breached.	n/a	The comment is not specific and appears to be more related to policy implementation.
0794b/M/04/C	Wainhomes	MM/005	Policy SP1 Development Strategy		N	Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full. 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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.	See summary.	The shortfall amount 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. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0808/M/05/C	Story Homes	MM/005	Policy SP1 Development Strategy		Y	Support modification regarding change to housing requirement.	None	Noted.
0902/M/02/C	Pipecroft Ltd	MM/005	Policy SP1 Development Strategy		N	The addition of 'a minimum' to the text relating to the housing target is welcomed. However, there are still significant concerns that the Local Plan sets a housing target which will not deliver the OAHN for the borough. There are additional sites within the borough that are currently available and deliverable, and their allocation could enable the Council to deliver the OAHN during the plan period.	Allocate more housing sites to meet the OAHN.	The shortfall will be addressed through the review of the Local Plan. The Inspector has concluded that this is an appropriate way forward.
0987/M/04/C	Elaine Deegan	MM/005	Policy SP1 Development Strategy		N	Reduce the Inskip allocation to 82 dwellings.	Amend figures in text and tables to reflect the suggested reduction in the Inskip allocation to 82 dwellings.	The council do not accept that the modified allocation at Inskip should be further amended.
0995/M/06/C	Paul Desborough, IRAG	MM/005	Policy SP1 Development Strategy		N	Amend table to reflect the deletion of INS_07.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.



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0051/M/03/C	Robert Fail, Wyre Labour Group of Councillors	MM/006	Policy SP2 Sustainable Development		N	The IPCC report shows unprecedented changes are needed to limit global warming. The modification does not sufficiently reflect the seriousness of the impact of climate change.	It is unclear what the design requirements would be, therefore the requirements need to be more prescriptive.	The comment is general and does not relate to the changes made in MM/006
0545/M/06/C	Garstang Town Council	MM/006	Policy SP2 Sustainable Development	Point 1	N	Requires that all development "contributes positively to overall physical, social, environmental and economic character of the area in which the development is located" without explaining in practical terms how this might be achieved and measured.	n/a	Policy SP2 is a strategic policy designed to set the broad strategic framework within which the more detailed policies. It reflects the concern of national planning guidance with the three elements of sustainability - economic, social and environmental. The detailed policies of the Plan give force to the strategic requirements of Policy SP2. Section 10 of the Plan establishes a monitoring framework.
0645/M/02/C	Nether Wyresdale Parish Council	MM/006	Policy SP2 Sustainable Development	Point 1	N	Amend the new Point 1 to read (see underlined text below for additional wording) "All development should contribute.....development is located. <u>Where development fails to meet this development criteria, it will be deemed as unsustainable and will be refused</u> ".	See summary.	The suggested amendment is not considered necessary or appropriate. Development proposals fall to be considered against the local plan as a whole and any other material considerations.
0937/M/02/C	Bourne Leisure Ltd.	MM/006	Policy SP2 Sustainable Development	Point 4	Y	The modification which adds a new criterion to Policy SP2 which states "maximise the use of previously developed land "is endorsed and considered to be an appropriate strategy consistent with national policy. The change in market conditions and customer demands means it is important for existing sites to be able to adapt and change effectively.	None	Noted
0941/M/01/C	Gladman Developments Ltd	MM/006	Policy SP2 Sustainable Development		N	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.	Further modifications are required to ensure flexibility is built into the WLP in accordance with the presumption in favour of sustainable development. This is important to meet housing needs in full and positively respond to opportunities beyond settlement boundaries which may arise over the plan period and to assist in meeting its housing needs in full.	The settlement boundaries are not subject to a MM.
0808/M/06/C	Story Homes	MM/007	Strategic Policies (5.4 Green Belt)	Para. 5.4.2 Para. 5.4.4	Y	<p>Support clarification at para 5.4.2 that the Green Belt at Blackpool Road does not fulfil any Green Belt function.</p> <p>Support clarification at para 5.4.4 that exceptional circumstances exist for removal of land from Green Belt.</p>	None	Noted.
0944/M/03/C	Applethwaite Ltd	MM/007	Strategic Policies (5.4 Green Belt)	Para. 5.4.2 Para. 5.4.4.	Y	Applethwaite strongly supports the addition of the paragraphs which provide a clear and improved explanation of why exceptional circumstances exist to justify the alteration of the green belt boundary at Poulton including the part of site allocation SA1/8. Applethwaite agrees that the land makes an important contribution to meeting the housing OAN in Wyre and if the land was not released from the green belt the shortfall in meeting the housing OAN would increase as there is no alternative site that could deliver equivalent housing capacity.	None	Noted

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0953/M/02/C	Telereal Trillium	MM/007	Strategic Policies (5.4 Green Belt)	Para 5.4.4	Y	Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ. However, the proposed wording of Paragraph 5.4.4 is incorrect as the outline planning permission is for mixed residential, retail / leisure and employment development and it does not prescribe the location of any of the permitted uses. The part of the site identified may therefore be developed for commercial use and not residential use.	Amend the last sentence of Paragraph 5.4.4 to read; "This parcel of land has outline planning permission for mixed use development."	<b>The Council supports providing further clarification at 5.4.4 that the outline planning permission is for mixed use, including residential. The Council suggest that a further amendment would be appropriate to state – "5.4.4. ... This parcel of land is part of an has outline planning permission for mixed use development, including residential development which contributes towards meeting the housing OAN"</b>
0545/M/07/C	Garstang Town Council	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4	N	The new wording stresses that the open and rural character of the countryside is intrinsic to the identity of and sense of place. A string of development along the west of the A6 between the Cockerham Road and Longmoor Lane will soon obscure the once peaceful rural setting by the combined impact of over 500 dwellings and a convenience store. Residents are unlikely to accept the justification. There must be a more imaginative solution to the location of new housing. Appendix E demonstrates that the Borough is becoming two regions separated by acres of unbuilt, sparsely populated mid- lands where a town the size of Milton Keynes could be dropped into without anybody noticing. All that is preventing a long term solution is the limit of our imaginations.	n/a	The representation appears to be concerned with the implementation of Policy SP4 and the impact of development on the countryside at Garstang rather than a comment on the wording of the modification itself. The Local Plan balances a wide range of needs and requirements, including meeting development needs and the protection of the countryside.
0645/M/03/C	Nether Wyresdale Parish Council	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4, point 1	N	The Parish Council supports the Modifications to Policy SP4. Point 1 should be amended (suggested additional wording underlined) as follows: "The open rural character of the countryside will be recognised for its intrinsic character, beauty and landscape role it can play in defining the character and setting of individual rural settlements. Development which....."	See summary.	The suggested to Policy SP4 Point 1 is not in line with the NPPF and therefore not supported.
0937/M/03/C	Bourne Leisure Ltd.	MM/009	Strategic Policies (5.5 Countryside Areas) and Policy SP4	SP4	Y	The amendment to Policy SP4 is consistent with the modification to Policy EP9 by referring to "holiday accommodation" rather than "extensions to holiday accommodation". Tourism plays a key role in the Wyre economy. It is important that a favourable approach to existing or new tourism development is given. The modification is consistent with national policy.	None	Noted
0616/M/02/C	Claughton on Brock Parish Council	MM/010	Strategic Policies (5.6 Forest of Bowland AONB) and Policy SP5 Forest of Bowland AONB	Para 5.6.3 SP5	N	No specific issue with the modification wording however I consider that more needs to be stated. Policy SP5 is to protect from proposed damaging or potentially destructive development proposals and applications, irrespective of whether they are within or outside of the AONB or both. My concern is to ensure that policies are capable of adjusting and adapting to meet the needs of the local economy as we are living in a volatile and changing world both economically and environmentally. The policies need to have the capability to enable the Planning and Development Officers the leeway to respond to changes in Central Government Policies. In this specific instance I would highlight Agricultural Policy - as we simply do not know what this will be in a 'Post Brexit Britain'.	I suggest revised wording (additions are in italic font): Amend Policy SP5, Point 1 to read: "The <u>landscape and scenic beauty of the</u> Forest of Bowland AONB will be protected from any development which would affect <u>the</u> character, appearance and setting of <u>the AONB</u> . <i>The processes of planning and development decision making must also seek to both accommodate the requirements and demands of both the local economy and new or modified central government economic, agricultural, ecological or other relevant policies.</i> "	The representation raises issues not previously raised and not directly relating to the changes to the policy under MM/010. In any event the suggested wording is not necessary or appropriate. In determining planning applications the Local Authority must take into account relevant material considerations which may include the matters suggested as an amendment to the policy.
0645/M/04/C	Nether Wyresdale Parish Council	MM/010	Strategic Policies (5.6 Forest of Bowland AONB) and Policy SP5 Forest of Bowland AONB	SP5	Y	Policy Modification strongly supported.	None.	Noted.
0343/M/04/C	Highways England	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para. 5.7.3	Y	The inclusion of amended wording in para. 5.7.3 is welcomed and, although vague regarding the specification of what would constitute such circumstances, the proposed amendment would enable development where impact assessment indicate a severe impact to be challenged appropriately in line with policy set out within the Local Plan.	None.	Noted.
0808/M/07/C	Story Homes	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para. 5.7.2 Para. 5.7.3 SP6	Y	Support modification that recognises flexibility in development format might be needed on site by site basis.	None	Noted.

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0937/M/04/C	Bourne Leisure Ltd.	MM/011	Strategic Policies (5.7 Viability) and Policy SP6 Viability	Para 5.7.2 SP6	Y	The deletion of Policy SP6, Point 4 and the additional wording in para 5.7.2. to maintain the confidentiality of commercial information is endorsed. It is important to protect the commercial interests of applicants in order to ensure they are able to maintain their competitiveness and develop their businesses and thereby support the local economy. The tourism industry plays a key role in the Wyre economy. The modification is consistent with national policy.	None	Noted
0051/M/04/C	Robert Fail, Wyre Labour Group of Councillors	MM/013	Policy SP8 Health and Well-Being		Y	The housing allocations are not consistent with this policy. The transport infrastructure will not support the level of development proposed. Development of housing allocations in Thornton Cleveleys and Poulton will increase congestion and result in a deterioration in air quality on local roads. The health and well being of residents in the area is not being considered.	The wording is not unreasonable but the housing allocations in Thornton Cleveleys contravene the policy and should be reconsidered.	The comment is general and do not relate to the change made by MM/013.
0545/M/08/C	Garstang Town Council	MM/013	Policy SP8 Health and Well-Being		N	There is a lacuna specifying what "public health" issues that development might adversely have impact on. The authors of the report must have an idea what they are thinking of and we need to know.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0051/M/05/C	Robert Fail, Wyre Labour Group of Councillors	MM/014	Policy CDMP1 Environmental Protection		Y	The housing allocations are not consistent with this policy. The transport infrastructure will not support the level of development proposed. Development of housing allocations in Thornton Cleveleys and Poulton will increase congestion and result in a deterioration in air quality on local roads. The health and well being of residents in the area is not being considered.	The wording is not unreasonable but the housing allocations in Thornton Cleveleys contravene the policy and should be reconsidered.	The comment is general and do not relate to the change made by MM/013.
0937/M/05/C	Bourne Leisure Ltd.	MM/014	Policy CDMP1 Environmental Protection	Point 1	Y	The modified wording to Point 1 (d) (ii) is endorsed to provide more stringent control over development which would result in, or contribute to, a deterioration in air quality. The Cala Gran site is in close proximity to a waste recycling centre so it is important for new development applications to take into full consideration any potential impact which poor air quality may have on existing leisure and tourism facilities and visitor accommodation. The modification is consistent with national policy.	None	Noted
0545/M/09/C	Garstang Town Council	MM/015	Policy CDMP2 Flood Risk and Surface Water Management		N	It is generally known by those in Flood Prevention Groups that these schemes are not managed strictly following the completion of the development. A legally binding and, importantly, enforceable, agreement must be written into any scheme.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification. "These schemes" is not clearly defined.
0645/M/05/C	Nether Wyresdale Parish Council	MM/016	Policy CDMP3 Design		N	The Parish Council would suggest changes of the wording as follows (see crossed out and underlined text below). All development must be designed to <del>respect or enhance</del> <u>and respond to the distinctive character of the area as defined</u> .....having regard to <del>issues including</del> density, siting, layout, <del>form</del> , scale, height, <u>massing, proportion, visual characteristics</u> , orientation, landscaping and use of materials.	See summary.	The suggested amendment is not considered necessary or appropriate. The policy is not intended to offer a comprehensive list of design matters to be considered, indicated by the use of the word "including". Further the suggested amendments have not been clearly or sufficiently justified. It is not appropriate to delete 'and minimise energy consumption'
0645/M/06/C	Nether Wyresdale Parish Council	MM/017	Core Development Management Policies (6.5 Environmental Assets)		Y	Modification strongly supported.	None.	Noted.
0545/M/10/C	Garstang Town Council	MM/018	Policy CDMP4 Environmental Assets		N	"development will have no unacceptable cumulative impact on landscape character "within or outside settlement boundaries" etc. Any restriction is welcome but the definition and examples of "unacceptable cumulative impact" needs to be fleshed out so that residents can measure these impacts. We argue that developments such as the Cockerham Road and Nateby Fields that combine to form 500 new families, 1,000 extra cars and associated movement is a prime example of what this policy is designed to prevent.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0645/M/07/C	Nether Wyresdale Parish Council	MM/019	Policy CDMP5 Historic Environment		Y	Policy Modification supported.	None.	Noted.
0363/M/04/C	Jessica Bond, Taylor Wimpey UK Limited	MM/020	Policy CDMP6 Accessibility and Transport	Part 2	Y	Support amendment to Part 2 to include reference to; 'where practical' developments should make appropriate provision for EVC charging points. Support the degree of flexibility that this MM proposes for Part 2 of the Policy. The proposed MM ensures that a sufficient degree of flexibility can be exercised by the applicant and decision taker when considering whether the provision of EVC points are necessary in the context of a development.	None	Noted.

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0032/M/04/C	Blackpool Council	MM/021	Housing 7.1 Introduction		N	MM/021 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.	Delete reference to meeting 97% of the OAN.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.
0290/M/04/C	Fylde Council	MM/021	Housing 7.1 Introduction		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach.
0363/M/05/C	Jessica Bond, Taylor Wimpey UK Limited	MM/021	Housing 7.1 Introduction		N	TW acknowledges the need to provide suitable housing for all age cohorts provided that the identified need is based on robust and sound evidence. The Practice Guidance (ID: 56-005-20150327) is clear that authorities "should take account of evidence that demonstrates a clear need for housing for people with specific housing needs."  Regarding the delivery of homes which are suitable and capable of meeting the needs for older people, the Practice Guidance states that "Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling". To ensure that the policy is effective, TW requests that further guidance is provided, which sets out how the Council will work with developers and housing associations to deliver the necessary homes.  Effective – MM/021 does not present a clear guidance as to how the Council proposes to work with developers to ensure that an appropriate mix of housing, to meet identified need is delivered.	Guidance is provided as to how the Council proposes to work with developers and housing associations to deliver the necessary homes which are suitable for older people, and people with restricted mobility.	Paragraph 7.1.4 in MM/021 presents introductory text to the Policies in chapter 7. It is not its purposes to set detail guidance. This is a matter for supplementary guidance.
0545/M/11/C	Garstang Town Council	MM/021	Housing 7.1 Introduction	Para 7.1.4	N	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.	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification.
0794b/M/05/C	Wainhomes	MM/021	Housing 7.1 Introduction		N	Although the Council had previously considered that it was not possible to meet the full OAN due to highways constraints, the Main Modifications referenced above now incorporate over 1,000 additional dwellings into the trajectory. However there would remain a significant shortfall of 295 dwellings over the plan-period in terms of the OAN which would only serve to exacerbate unmet affordable housing needs across the Borough. The Council's approach should also be seen within the context of the low levels of new housebuilding over a prolonged period of time. It is important that the emerging local plan seeks to significantly boost the supply of homes in accordance with the requirements of the NPPF, and the OAN is met in full. It is not clear whether there are additional houses that could be identified at this stage in order to meet the OAN in full.  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. An informed judgement cannot be made as to the 295 dwelling shortfall and whether this amount of additional housing would result in significant and demonstrable adverse consequences when assessed against the benefits of meet the OAN in full. The housing trajectory set out through Appendix 1 of the Housing Implementation Strategy (2018) provides no flexibility; it seeks to deliver 9,285 dwellings over the plan-period. It is inevitable that sites within the housing trajectory, both large and small, will not be built out at the rates envisioned. This highlights the risks and lack of contingency in ensuring that the constrained housing requirement is met. The Council's approach to windfall sites is to incorporate 50dpa into the housing trajectory from the year 2021 i.e. the upper range of what the Inspector considered appropriate. No objection to a windfall allowance but the evidence base including highways need to demonstrate that this can be delivered.	See summary.	The shortfall amount 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. 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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The delivery of 9,280 dwellings compared with 9,580 has been assessed through the Sustainability Appraisal. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0808/M/08/C	Story Homes	MM/021	Housing 7.1 Introduction	Para. 7.1.4	Y	Support para. which recognises that a wide range of housing is needed.	None	Noted.

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1060/M/05/C	Carrick Sports Ltd	MM/021	Housing 7.1 Introduction		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>
0172/M/02/C	Ingle's Dawndew Salad	MM/022	Housing (7.2 Housing Land Supply)		N	<p>Considers that the Sedgefield method is the most appropriate method of making up the shortfall in housing delivery.</p>	<p>Allocate land at Ingle's Dawndew Salad for residential development as proposed at Publication Draft stage.</p>	<p>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. The reference to the land at Ingle's Dawndew Salad is not a new comment but relates to an omission site put forward at Publication stage.</p>
0297/M/05/C	Home Builders Federation	MM/022	Housing (7.2 Housing Land Supply)	Para. 7.2.5 Para. 7.2.6 Para. 7.2.7	N	<p>Concerns in relation to a windfall allowance, as set out previously. However, the need to avoid double counting is supported.</p> <p><b>Paragraph 7.2.5</b> states that the most appropriate way to deal with any shortfall since 1 April 2011 is for the shortfall to be met over the remainder of the Local Plan period. Consider that it is preferable to address any shortfall in delivery as soon as possible and preferably using the Sedgefield method, and that the Council should be actively working with homebuilders to deliver homes and reduce the shortfall.</p> <p>Agree with the addition of test to <b>paragraph 7.2.6</b> to states that the figure in Policy HP1 is expressed as a minimum and there is no planning barrier to the early delivery of sites if circumstances and market conditions allow.</p> <p>Do not consider it is necessary to add the additional line at the end of paragraph 7.2.6 stating that the Sedgefield approach is not realistic, and it would lead to the Plan becoming out of date after adoption. It is considered that the final sentence is not effective as it adds little to the plan, and that it does not support a positively prepared plan as the issue identified could be resolved through the proactivity of the Council and housebuilders.</p> <p>New <b>paragraph 7.2.7</b> - whilst it is considered that based on previous definitions of persistent under-delivery the 20% buffer would be appropriate it is noted that going forward this plan will be used in decision making alongside the 2018 NPPF. The 2018 NPPF provides details as to what buffer should be applied and in what circumstances. It is therefore queried if the addition of this paragraph is necessary or appropriate.</p>	<p>See summary of representation.</p>	<p>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.</p> <p>The support to the amendments to paragraph 7.2.6 is noted. The last sentence in paragraph 7.2.6 is the conclusion reached by the Inspector (paragraph 21 in his Post Hearing Advice) and provides justification for the use of the 'Liverpool' approach. The sentence does not have any bearing on whether the Local Plan is positively prepared or not.</p> <p>The Local Plan is examined against the 2012 NPPF but as stated in paragraph 7.2.7 the position with regards to the buffer may change. The paragraph is considered appropriate.</p>
0358/M/02/C	Hollins Strategic Land	MM/022	Housing (7.2 Housing Land Supply)		N	<p>Windfall allowance - although EL5.012 provides evidence which demonstrates significant housing completions on non-allocated sites permissions will have been granted on the basis of the NPPF tilted balance as the Council did not have an up to date plan or a 5-year HLS for a number of years. Once adopted, the eLP will have allocated as much land for housing as is possible without there being a severe impact on the highway network. It is therefore considered likely that LCC Highways will object to the windfall schemes during the application processes. The Council must demonstrate whether this is likely, by obtaining a response on the matter from LCC Highways.</p> <p>Five year supply - will be reduced as a result of concerns regarding the windfall supply and the requirement for masterplanning. Plan period housing land supply - masterplanning process will have a knock-on effect moving some delivery beyond the Plan period, further reducing the ability of the council to deliver its housing needs.</p>	<p>Windfall - the windfall allowance should be removed or significantly reduced, at least to 25. This would result in the HLS for the plan period falling and the 5-year supply becoming even more fragile. Masterplanning - remove the masterplanning requirement or reduce the masterplanning guidance requirements.</p>	<p>The Inspector having considered the evidence submitted pre and during the hearings including highway evidence has concluded that a windfall allowance for sites of less than 25 dwellings can be made. As indicated by the representor, allocations such as SA3/4, may deliver a higher figure than the minimum in the allocation policies.</p> <p>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 guidance follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements in the guidance is commensurate with submitting an outline planning application. For a person with the right experience in preparing a masterplan it is not a complicated process. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing.</p>

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0363/M/06/C	Jessica Bond, Taylor Wimpey UK Limited	MM/022	Housing (7.2 Housing Land Supply)		N	Support approach to windfall allowance and refer to para 48 of the Framework. WBC has always delivered units on windfall sites. In the absence of an up to date Local Plan the majority of the Council's supply has taken place on windfall sites. Notwithstanding, WBC is anticipating that windfall sites will only form a small element of future supply once the plan is adopted. TW consider that this is a sensible and robust judgement, given the unreliable nature of supply from windfall sites post adoption of the plan.  Dealing with past under delivery since the base date of the Plan is necessary for Wyre, however TW has concerns over the direct reference to the 'Liverpool' method as an approach to managing previous under delivery in the borough. The Framework (para 182) requires plans to be positively prepared on a strategy which seeks to meet the objectively assessed need. Whilst TW accepts the Inspectors opinion that the Liverpool approach is acceptable and justified at this point in time, it is considered that the 'Liverpool' method for dealing with previous under delivery in the longer term does not reflect this principle. Furthermore, the Practice Guidance (ID: 3-044-20180913) states that where authorities are unable to address past shortfalls over a 5-year period, they may need to reconsider their approach to bringing land forward, and the assumptions which they make.	TW considers that the reference to the 'Liverpool' method should be omitted from the WCLP. This is on the basis that the 'Liverpool' method undermines the principles of the Framework which requires development plans to be positively prepared and meet their objectively assessed need.	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. The Inspector concludes in his Post Hearing Advice (paragraph 21) that the use of the 'Liverpool' approach is justified.
0645/M/08/C	Nether Wyresdale Parish Council	MM/022	Housing (7.2 Housing Land Supply)		Y	The Parish Council supports the Modification and particularly the 'Liverpool Method' to address the supply shortfall rather than the 'Sedgefield Method' to ensure more realistic delivery and certainty proposed within the development within the strategy and associated policies of the Local Plan.	None.	Noted.
0794b/M/06/C	Wainhomes	MM/022	Housing (7.2 Housing Land Supply)		N	The Housing Implementation Strategy (2018) provides for a new methodology for calculating the 5-year housing land supply, and this is reflected through Main Modification MM/22. The Council's housing land supply position would be marginal even with the benefit of the Liverpool Method in terms of addressing the backlog. The threshold in terms of achieving a deliverable 5-year housing land supply is 3,340 dwellings based on the Council's methodology. It would take for 133 dwellings to fail to be delivered over the 5-year period for the housing land supply position to fall short of 5-years. The Council's approach serves to emphasise the absence of contingency and the risks in terms of the plan becoming out-of-date subsequent to adoption when the 5 year supply is assessed against the deliverability test in the revised NPPF and PPG. Our reading of the NPPF and PPG is that paragraphs 73b and 74 would not apply to this plan when read alongside the PPG (ref 3-049-20180913). Even if it did the period of grace is limited.	n/a	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 which are reflected in the Housing Trajectory included in the Housing Implementation Strategy. The representor provides no new evidence why delivery rates will not be met. The Council is committed to an immediate review of the Local Plan which includes updating housing need in line with the latest Government Guidance. The Inspector has concluded that this is an appropriate way forward. The review will include a review of transport and highway issues as set out in Policy LPR1.
0808/M/09/C	Story Homes	MM/022	Housing (7.2 Housing Land Supply)		N	The windfall threshold of "less than 25 dwellings" is unclear - windfall is windfall. Agree that the windfall allowance should only take effect from 31 March 2021 to avoid double counting. Disagree with the use of the 'Liverpool' method as the basis for dealing with a shortfall. The Inspector has concluded that there is no evidence to support flooding and highway constraints to delivery. 'Sedgefield' method more appropriate. The council could undertake a call for sites exercise to identify the additional land it requires. The argument at para. 7.2.6 that the 'Sedgefield' method is not appropriate because the Plan would become out of date quickly after adoption is counterintuitive when the council has committed to undertaking an early review. The 'Liverpool' method is incompatible with an early local plan review. The Story Homes site at Blackpool Road can yield more homes than suggested by the council. The inclusion of a 20% buffer at para. 7.2.7 is supported.	See summary of representation.	The introduction of a windfall allowance for sites of less than 25 dwellings is in line with the Inspector's conclusions at paragraph 20 of his Post Hearing Advice.  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. No new matters are raised in the representation.
0902/M/03/C	Pipecroft Ltd	MM/022	Housing (7.2 Housing Land Supply)		N	The Sedgefield method would be preferable in order to meet the shortfall in housing delivery as soon as possible, as required by Government policy. Furthermore, there are additional sites available which could be developed in the short term.	Use of the Sedgefield method for calculating housing land supply.	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. No new matters are raised in the representation.
0941/M/02/C	Gladman Developments Ltd	MM/022	Housing (7.2 Housing Land Supply)		N	The Liverpool approach does not appear to be consistent with the requirements of national policy. The approach seems at odds with the approach to significantly boost the supply of housing to spread past housing delivery failure over a longer period into the future when it should have already been delivered. Furthermore, the Local Plan does not seek to meet full housing needs over the plan period. Any further delay in meeting unmet housing needs is failing to meet those households who need both market and affordable homes since the start of the plan period. There are households who need homes now and it is unreasonable to expect them to wait until later in the plan period when the housing should have already been delivered. The reference to the Liverpool method via modification is not considered to be justified given the previous shortfall in housing delivery that has already accumulated.	The Plan should make clear that the Sedgefield method be used for the purposes of calculating housing land supply to ensure housing shortfall is addressed as soon as possible.	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.  No new matters are raised in this representation. There is sufficient land to meet the needs for at least the next five years when the revised Local Plan would have been adopted.

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1060/M/06/C	Carrick Sports Ltd	MM/022	Housing (7.2 Housing Land Supply)		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>
0297/M/06/C	Home Builders Federation	MM/023	Policy HP1 Housing Land Supply		Y	The HBF is supportive of the addition of 'a minimum', the addition of 'at least' and the increase in the housing requirement, within point 1 of Policy HP1. The HBF also supports the deletion of point 2 of the policy.	n/a	Noted.
0363/M/07/C	Jessica Bond, Taylor Wimpey UK Limited	MM/023	Policy HP1 Housing Land Supply		Y	<p>TW supports the references to 'minimum' and 'at least' in the context of delivering the housing requirement.</p> <p>As the Local Plan is only proposing to meet 97% of its identified housing OAN, it is important that the housing requirement is seen as an absolute minimum figure. It is imperative that the Council is supportive of delivering a higher quantum of development, above its identified requirement to enable it to meet its housing OAN in full. This will ensure that the Local Plan is considered positively prepared in the context of the Framework (para 182), and that it is seeking to meet its OAN in full.</p>	None	Noted.
0808/M/10/C	Story Homes	MM/023	Policy HP1 Housing Land Supply		Y	Support changes to housing figures	None	Noted.
0902/M/04/C	Pipecroft Ltd	MM/023	Policy HP1 Housing Land Supply		N	<p>Significant concerns that the Local Plan will not, as a minimum, meet the OAHN and therefore cannot be considered to meet the needs of the borough during the Plan period. There are additional sites in the borough which are available and deliverable, allocating some of these sites could enable to the Council to meet the OAHN.</p> <p>Notwithstanding the above, the addition of 'a minimum' to the overall housing target and 'at least' to the annual requirement is supported. The deletion of point 2 of the policy is also welcomed.</p>	The allocation of additional housing sites to at least meet the OAHN.	The Local Plan provides for 97% of the OAN. The small outstanding shortfall (of less than a year's supply) will be addressed through the review.

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1060/M/07/C	Carrick Sports Ltd	MM/023	Policy HP1 Housing Land Supply		N	<p>The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings.</p> <p>The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 annum. There is an implication that the new OAHN seems reactive.</p> <p>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 (see table submitted with the representation). 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. 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.</p> <p>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.</p>	<p>Recommendation 1: that the OAHN be reinstated to 9,580 dwellings over the plan period in the interests of justified and positive plan making.</p> <p>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.</p> <p>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.</p> <p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>The OAN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply.</p> <p>Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.</p>
0051/M/06/C	Robert Fail, Wyre Labour Group of Councillors	MM/024	Housing (7.3 Housing Mix)		N	The Plan recognises a shortage of smaller properties in Wyre but despite the evidence published in the SHMA new developments don't reflect the needs of the community.	To inform future policy changes the supply and demand of each housing type needs to be monitored and the policy adjusted where required.	The comment is general and do not relate to the change made by MM/013.
0297/M/07/C	Home Builders Federation	MM/024	Housing (7.3 Housing Mix)		Y	The HBF supports the recognition within the text that the policy does not seek to impose any specific Building Regulation 'optional standards' but that it provides a flexible framework.	n/a	Noted.
0363/M/08/C	Jessica Bond, Taylor Wimpey UK Limited	MM/024	Housing (7.3 Housing Mix)		Y	TW supports the degree of flexibility which has been incorporated into the reasoned justification of Policy HP2. The proposed MM will ensure that the Policy is effective, in the context of the Framework whilst retaining a degree of flexibility in the provision of appropriate housing, capable of meeting the need for older people, and those with restricted mobility.	None	Noted
0297/M/08/C	Home Builders Federation	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	Para. 7.4.2 HP3	Y	The amendment to paragraph 7.4.2 and to Policy HP3 to increase the threshold to 11 or more dwellings is supported.	n/a	Noted.
0545/M/12/C	Garstang Town Council	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	HP3	Y	We support the revised policy that these dwellings need to be integrated into the development and subject to conditions in Planning Consents that are inflexible.	n/a	Noted.
0808/M/11/C	Story Homes	MM/026	Housing (7.4 Affordable Housing) and Policy HP3 Affordable Housing	HP3	Y	Support modification to HP3 regarding affordable housing	None	Noted.
0645/M/09/C	Nether Wyresdale Parish Council	MM/028	Policy HP6 - Rural Workers Accommodation in the Countryside		Y	Policy Modification supported.	None.	Noted.
0545/M/13/C	Garstang Town Council	MM/032	Policy HP8 Accommodation for Gypsy, Travellers and Travelling Showpeople		N	<p>Refers to MM/031 and MM/032 but logged as MM/032 as the comments refer to the allocation</p> <p>Although not in Garstang Parish, Conway is situated at the Northern Toll Bar and the entrance to Garstang. We naturally wish to see strict screening conditions that are enforced to ensure that the site is not in conflict with its essential rural surroundings. The present site at Utopia Park is a mix of caravans and motor homes and large HGVs and trailers carrying fairground equipment and is open to view from the River Wyre footpath.</p>	n/a	The comments are not sufficiently specific to the change proposed by the Main Modification. Conditions are a matter for the development management process.



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0297/M/09/C	Home Builders Federation	MM/034	Policy HP9 Green Infrastructure in New Residential Developments		Y	The amendment to Policy HP9 to increase the threshold to 11 or more dwellings is supported.	n/a	Noted.
0808/M/12/C	Story Homes	MM/035	Policy HP10 Houses in Multiple Occupation		N	The new test of harm to the living conditions of existing residents would require an audit of said living conditions before any impact can be measured - too onerous.	See summary of representation.	MM/035 does not introduce a new test but replaces the expression in criterion a) 'amenity of neighbouring properties' to improve the clarity of the document. This is in line with the Inspector's suggestion in his Preliminary view (EL1.001a paragraph 51)
0343/M/05/C	Highways England	MM/036	Economy (8.2 Employment Land Supply)		Y	The loss of 2ha of employment land, in which the development use class is not specified, is not observed to be of material significance to Highways England.	None.	Noted.
0953/M/03/C	Telereal Trillium	MM/036	Economy (8.2 Employment Land Supply)	Table 8.2 Footnote 52	Y	Telereal Trillium and McDermott Homes fully support Footnote 52 of Table 8.2 which acknowledges and sanctions the net loss of the employment floorspace at Clarke House within the proposed site allocation SA1/11.	None	Noted.
0343/M/06/C	Highways England	MM/037	Policy EP1 Employment Land Supply		Y	The reduction of employment land by 1.58 in the rural areas is not projected to have a noticeable impact on either the Local or Strategic Road Networks.	None.	Noted.
0937/M/06/C	Bourne Leisure Ltd.	MM/043	Economy (8.9 Holiday Accommodation) and Policy EP9 Holiday Accommodation	8.9 EP9	Y	The amendment to Policy EP9 and title 8.9 is consistent with the modification to Policy SP4 by referring to "holiday accommodation" rather than "extensions to holiday accommodation". Tourism plays a key role in the Wyre economy. It is important that a favourable approach to existing or new tourism development is given. The modification is consistent with national policy.	None	Noted
0645/M/10/C	Nether Wyresdale Parish Council	MM/044	Economy (8.9 Holiday Accommodation) and Policy EP9	EP9	Y	Policy Modification supported.	None.	Noted.
0645/M/011/C	Nether Wyresdale Parish Council	MM/046	Economy 8.11 and Policy EP11 Protection of Community Facilities in Rural Areas	EP11	Y	Policy Modification supported.	None.	Noted.
0358/M/03/C	Hollins Strategic Land	MM/047	Site Allocations		N	The council's requirement for a masterplan and the requirements of it's published guidance on the preparation of masterplans will act as a barrier to delivery. Masterplan for SA3/4 submitted.	Amend SA3/4 to allow for the submitted masterplan to be sufficient.	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 guidance follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements in the guidance is commensurate with submitting an outline planning application. For a person with the right experience in preparing a masterplan it is not a complicated process. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing. The masterplan process and is not a barrier to development and the guidance has been helpful elsewhere in the Borough.  Whether the submitted document is an acceptable masterplan is not a matter for the Local Plan process and specifically the consultation on the proposed MMs.
0545/M/15/C	Garstang Town Council	MM/047	Site Allocations	Para 9.1.2	N	We seek clarification of the meaning of the deleted last sentence beginning "In view of the fact that due to highway constraints dwelling numbers are maximum....." Did this mean that there could be no more development and if so what has changed?	n/a	The highway evidence submitted by Lancashire County Council established maximum numbers which could be supported by the local highway network with certain deliverable improvements. The Inspector having considered the submitted evidence considered that some additional development could be supported. Furthermore additional highway assessments need to be carried out by way of an immediate review of the Local Plan in order to determine whether further development to meet the full Objectively Assessed Need for Housing can be supported.

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0808/M/13/C	Story Homes	MM/047	Site Allocations	Para. 9.1.2 Para. 9.1.6	Y	Supports the deletion of the reference to highway caps.  The council's masterplan guidance is cumbersome and unclear in respect of the council's responsibility as the custodian of each masterplan. Unclear who is responsible for each masterplan and whether the council has the resources and expertise to produce the documents. Does not affect the soundness of the local plan but it is important to clarify 9.1.6 as this could frustrate delivery.	See summary of representation.	This is not a comment relevant to the MM/047 with regards to paragraph 9.1.6. Consequently it is not clear what amendment to paragraph 9.1.6 the representor requires.  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 masterplan guidance is clear that the role of the council is that of a facilitator and that the production of masterplan documents is the responsibility of landowners and their agents. It follows the approach of the former HCA (ATLAS) and it is being applied elsewhere in the Borough. The requirements the guidance is commensurate with submitting an outline planning application. To a person with the right experience in preparing a masterplan it is not a complicated process. The preparation of a masterplan will not delay delivery if landowner /developers work together and employ consultants with the right expertise. The masterplan will ensure that the allocations provide sustainable extensions to communities and not just additional housing.
0032/M/05/C	Blackpool Council	MM/048	Site Allocations (9.2 Residential Developments)		N	MM/048 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAHN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAHN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.	Delete reference to meeting 97% of the OAHN.	The 'shortfall' is determined by considering the housing figure against the OAHN figure and not the OAHN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAHN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAHN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAHN. It is irrelevant where in the OAHN range the 464 figure falls.
0290/M/05/C	Fylde Council	MM/048	Site Allocations (9.2 Residential Developments)		N	The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	The 'shortfall' is determined by considering the housing figure against the OAHN figure and not the OAHN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAHN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 housing figure. He refers to the figure of 479 as the OAHN. Reference to meeting 97% of the OAHN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAHN. This does not mean that it is the only and most appropriate approach.
1060/M/08/C	Carrick Sports Ltd	MM/048	Site Allocations (9.2 Residential Developments)		N	The Proposed Main Modifications suggests that the OAHN is to be dropped to 9,285, equating to 464 dpa – therefore only 97% of their OAHN requirement can be met. The rationale for 464 dpa is unclear. Assumed that this figure is included due to it matching the council's new supply figure of 9,285, having found an additional land supply of 1,060 dwellings since the close of the hearings. The 464 dpa target is below the mid-point of the OAHN range suggested of 457-479 dpa and 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 OAHN of 457 dwellings per annum. There is an implication that the new OAHN seems reactive. 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 (see table submitted with the representation). 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. 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. 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 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 OAHN be reinstated to 87% over the plan period in the interests of justified, positive and effective plan making.  Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.	The OAHN has not been reduced hence the recognition that there is a shortfall and a need for an immediate review to address the shortfall. It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness. The Inspector has considered the submitted trajectory and has made recommendations which are reflected in the amended trajectory included in the Housing Implementation Strategy. Comments relating to the January 2018 trajectory are out of time and irrelevant. The reference to the Turley comparative figure is unclear. Turley have no role in the process of identifying the housing land supply. Reference has been made to seven residential and mixed use allocations which are used as examples where delivery of housing will not be as envisaged by the council in its housing trajectory. The council refutes this evidence, which, in some cases, ignores reality, for instance SA3/3 has been adjusted so that completions do not start until 2022/23 however a site of 90 dwellings within the allocation is under construction, completions have started and houses are being occupied. It should be noted that at Forton (SA3/4) the gas pipeline is no longer a constraint to development. Further, the Hillhouse allocation (SA4) is being brought forward through a masterplan which has been through a recent public consultation (October 2018). It is noted that the request for a variation of condition relating to affordable housing (SA1/5) is not a matter of viability of residential development and does not indicate that the site will not come forward as expected. No evidence has been submitted that allocations SA3/1 and SA1/3 cannot come forward as predicted. The windfall allowance has been made in accordance with the Inspector's Post Hearing Advice following consideration of all submitted, written and oral evidence pre and during the hearing sessions regarding housing land supply. The proposed site at Calder House Lane has not been put forward previously at 'Publication' stage and thus it has not been considered through the examination process. It is therefore inappropriate to consider its allocation at this stage.
0794a/M/02/C	Wainhomes	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Given the highway position, the capacity of allocations should not be limited to a total as there is the potential for sites to deliver more housing. Limiting housing does not boost the housing land supply in accordance with the NPPF.	Delete "Total Capacity" and replace with "anticipated delivery".	The terminology "Total site capacity" is not subject to a Main Modification. In any event the suggested change is not appropriate. Also modifications MM/005 and MM/023 make it clear that the housing figure of 9,285 dwellings over the plan period is a "minimum". This is unrelated to any highway position.

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0953/M/04/C	Telereal Trillium	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	Y	The current reserved matters application and Clarke House planning application propose 224 no. dwellings combined and further applications on the residual, excluding the part of the site which benefits from detailed planning permission for retail and leisure development, could deliver at least 14 no. further dwellings and potentially more than 90 no. units if sheltered housing / retirement apartments were delivered.	Whilst the Site Capacity is a minimum figure, the figure should be increased to 330 dwellings to take account of this potential.	The figure of 300 takes account of the indicative scheme submitted with the outline permission which shows 70 sheltered accommodation dwellings on the parcel of land released from the Green Belt. The figure also take account of the scheme submitted for reserve matters on the remainder of the site (excluding the land with planning permission for retail). It is not necessary to increase the figure as the 300 is a minimum and there is no certainty at this stage that 330 can be delivered. In fact the representor indicates above that the parcel of land released from the GB could be developed for non-residential uses under the existing outline permission.
0987/M/05/C	Elaine Deegan	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Reduce the Inskip allocation to 82 dwellings.	Amend figures in text and tables to reflect the suggested reduction in the Inskip allocation to 82 dwellings.	The council do not accept that the modified allocation at Inskip should be further amended.
0995/M/03/C	Paul Desborough, IRAG	MM/049	Site Allocations (9.2 Residential Developments)	SA1 Table	N	Amend table after 9.2.3 to reflect a suggested 55 dwelling capacity for Inskip resulting from the deletion of INS_07.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
0676/M/04/C	Environment Agency	MM/050	SA1/1 West of Broadway, Fleetwood		n/a	There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <0.5% change of flooding level plus an allowance for climate change for the life of the development.  'this' has been shown as strikethrough in error. This sentence should read: Where finished floor levels cannot be set above the 1-in-200-year-plus climate change flood- <del>this</del> level, the developer....."	See summary.	<b>The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.</b>  <b>The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of &lt;0.5% change of flooding level plus an allowance for climate change ...."</b>
0072/M/03/C	Thornton Action Group	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton		N	Why retain the proposal for a new road between Slicock's Corner and Raikes Road as a possibility? This indicates the existing roads will not be able to cope with the additional traffic created by the 360 houses and a primary school on SA 1/2. Also, increased traffic along these roads which will result from the 400 houses to be built in North Thornton. This new link is in the wrong place and would not alleviate the problems on Lamb's Road/ Skippool Road. This matter needs to be urgently reconsidered.	See summary of representation.	The requirement for a link road has been a necessity of the allocation since Publication Deposit stage. The examination and hearings have given opportunity for this matter to be considered. The modification clarifies that this requirement remains unless satisfactorily demonstrated otherwise. The rationale for the link road is set out in the council's response to Matter 8 document library reference EL3.008a. The MM provides flexibility in the Local Plan.
0794b/M/08/C	Wainhomes	MM/051	SA1/2 Lambs Road/Raikes Road, Thornton		N	Support revised wording to the allocation policy in relation to highway infrastructure and education provision, but remaining lack of clarity on the evidence for the latter. Attempts made to engage with the Education Authority to ascertain their requirements but limited response.	n/a	Noted. Evidence for requirement for education provision has been the subject of the public hearings. The Policy as proposed to be modified allows for flexibility in terms of the nature of provision. The council is unable to comment on contact between the representor and Education Authority.
0774/M/02/C	Bruce Ramsden	MM/052	SA1/3 Land Between Fleetwood Road North and Pheasant Wood, Thornton	KDC4	N	KDC4 contains a double negative wording regarding flood risk	See summary	<b>The council acknowledge a typographical error in the wording of KDC4 (the word "no" should be crossed out in the modification) and will amend so that the text reads</b>  <b>"Parts of the western and southern boundaries lie within Flood Zones 2 and 3 where housing will not be permitted".</b>
0963/M/02/C	Strategic Land Group	MM/054	SA1/5 South East Poulton, Poulton-le-Fylde	KDC5	N	Draining into a watercourse is encouraged under the Sustainable Drainage Systems (SuDS) hierarchy. However, the policy as drafted does not reflect the specific conditions of the site (i.e. the lowest parts/levels of the site). To achieve a drainage solution which discharges solely into the watercourses could require a significant increase in levels adjacent to these properties which may not be acceptable for other urban design reasons.	To ensure the policy provides sufficient flexibility for this to be taken into account in the design of any development, while still ensuring that the SuDS hierarchy is reflected in the design, we would proposed that the words "...where possible" should be added to the end of the first sentence of Key Development Statement 5. For clarity, the resultant policy would therefore read: "Residual surface water run-off should drain into the river Wyre via Oldfield Carr Lane watercourse and Main Drain where possible."	The requirement for the development to drain into the watercourse (KDC 5 in the 'Publication' draft) is subject to an MM and therefore the comment is not a valid comment on the MMs.  Any deviation from the policy is possible but it would need to be justified. The proposed amendment is not necessary and could be viewed as watering down the policy. The developer should maximise the opportunities for draining into the watercourse and then other options in line with the hierarchy set out in Policy CDMP2 in order to properly drain a site in a sustainable manner.

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0398/M/02/C	Alexis De Pol	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	The Inspector's Post Hearing Advice recognises SA1/8 as a sustainable location. There is scope to provide linkages through the site to areas of land to the west. The Inspector states that a greater number of houses would allow a greater contribution to the Poulton Highway Mitigation Strategy and accepts that SA1/8 should accommodate a greater number of dwellings. However there are concerns that there are constraints affecting the site - flood risk and need for a new school and car park - that may constrain the delivery of the site. Even if this is not the case, the Inspector has identified that the highway evidence is high level without robustly modelling the effectiveness of new transport infrastructure in limiting the impact of development. It is understood that the majority of the highway concerns relate to the south of Poulton. Sufficient consideration has not been given to highway operation in the North of Poulton. Suggests the allocation of land to the west of SA1/8 - traffic from this location is likely to distribute north towards the A585 rather than south to the A586. No published evidence of substantial network issues in the immediate vicinity of the site. Local plan is not delivering the full OAHN and as such the proposed site would deliver a greater amount of housing.	Allocate additional land west of SA1/8 for residential development.	The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). Household projections are not housing requirements and it cannot be assumed that the projections translate to a specific implication for a particular site. The amendment to KDC 7 regarding the need for a new primary school on-site has been made in consultation with the Local Education Authority and should not be read as meaning that a new school will not be provided. Advice of the LEA will be sought as part of the Masterplanning process. The site was promoted by Taylor Wimpy through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.
0808/M/14/C	Story Homes	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	Supports the release of SA1/8 from the Green Belt - agrees that exceptional circumstances exists to warrant its removal. It is a sustainable site in a sustainable location. However: Unclear how the revised yield of 300 properties has been derived. The allocation boundary could be extended to include more land for homes, car park (if justified) and school. The car park is not required to justify the allocation - part of a wider initiative and would attract more traffic to the town centre. Its purpose is unclear. Remove references to making (undefined) cycle and pedestrian improvements outside of the area. The contribution to a new drain at Skippool Creek is undefined and could adversely affect viability. Undefined highway contributions could adversely affect viability. Object to the additional key development consideration regarding home owner packs (relating to impacts on Morecambe Bay European nature conservation site) - unenforceable and unjustified.	See summary of representation. Extend allocation boundary to enable sufficient land for the school to be included.	The new yield of 300 was calculated using the same basic methodology as all other allocations but assumes a higher net developable area outside of the flood zone on the assumption that the flood zone will be the location of a significant amount of the green infrastructure. The capacity takes into account the need for a new school and car park and need to avoid housing in the area of Flood Zone 2 and 3. The council has taken into account the submitted indicative schemes and the fact that a different dwellings mix and layout could increase the density and capacity of the site. The council has not prepared an indicative design studies for any allocations and this matters has not previously been raised. The representor does not indicate that the proposed capacity is inappropriate and has not put forward an alternative capacity for the site. There is no need for the allocation to be extended to accommodate the school. The request to extend the boundaries of the allocation is not a valid comment on the MM. The requirement for the provision of a car park as part of Poulton-le-Fylde Highway Mitigation Strategy and as part of Policy SA1/8 the is not matter covered by the MM and therefore not a valid comment at this stage. The comment relating to pedestrian and cycle connectivity outside the site does not relate to a MM change and therefore it is not a valid comment.  <b>Continued on the line below</b>
								There is no requirement for a new drain at Skippool Creek. The requirement for contribution towards the replacement of the tidal flap is not a new matter. This comment does not relate to a MM change and therefore it is not a valid comment. The Poulton-le-Fylde Highway Mitigation Strategy has been accepted and it is right that it remains a live document taking into account new evidence. The Local Plan includes a policy relating to viability. The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217.
0944/M/01/C	Applethwaite Ltd	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	Attention is drawn to the Inspectors Post Hearing Advice Note which states: 1.The failure to plan for enough new housing is a key concern; 2. The OAN is a robust figure and the Local Plan must do all it can to meet identified housing need; 3. Poulton is a sustainable and suitable location for housing growth ; 4.New housing delivery can be focused in sustainable locations with good public transport including Poulton. The increase to the site capacity from 154 to 300 dwellings of SA1/8 is welcomed but there is no explanation of what evidence the figure is based on and how it has been calculated. Each of the housebuilders with interest in SA1/8 has prepared a layout scheme illustrating the type and quantum of development and added together the total yield is higher than 300 dwellings. A sufficient quantum of development must be realised to provide the on and off site physical and community infrastructure to support the delivery of new housing. The Inspector notes that a larger number of houses would allow a greater contribution to the Poulton Highway Mitigation Strategy and off site sustainable transport measures. Extending the allocation would also accommodate sufficient land for a primary school. KDC1 of SA1/8 remains unchanged but Applethwaite believe the site can be delivered independently and does not need to be part of a masterplanning process.	It is requested that site allocation SA1/8 is extended so it has an overall site capacity of at least 500 dwellings.	The new yield of 300 was calculated using the same basic methodology as all other allocations but assumes a higher net developable area outside of the flood zone on the assumption that the flood zone will be the location of a significant amount of the green infrastructure. The capacity takes into account the need for a new school and car park and need to avoid housing in the area of Flood Zone 2 and 3. The Council has also taken into account the submitted indicative schemes which also cover land that is not allocated. The quantum of development on the indicative layouts relating to the allocation is less than 300, however a different dwellings mix and layout could increase the density and capacity of the site. The Inspector having considered all written and oral evidence, has not indicated to the Council in his Post Hearing Advice that consideration should be given to extending the boundaries of the site to accommodate additional development. The MM does not alter the Masterplanning requirements for the development of the site.

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1059/M/02/C	Jane Readman	MM/057	SA1/8 Land South of Blackpool Road, Poulton-le-Fylde		N	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.	1) Road congestion and danger 2) GP 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.	The comments are not sufficiently specific to the change proposed by the Main Modification.
0794a/M/03/C	Wainhomes	MM/058	SA1/9 South Stalmine		N	Given the highway position, the capacity of SA1/9 should not be limited to a total as there is the potential for sites to deliver more housing. Limiting housing does not boost the housing land supply in accordance with the NPPF. The requirement for home owner packs is unreasonable given the distance between the site and Morecambe Bay, with no direct link.	Delete "Site Capacity" and replace with "anticipated delivery".	The terminology "Total site capacity" is not subject to a Main Modification. In any event the suggested change is not appropriate. Also modifications MM/005 and MM/023 make it clear that the housing figure of 9,285 dwellings over the plan period is a "minimum". This is unrelated to any highway position.  The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217).
0794b/M/09/C	Wainhomes	MM/058	SA1/9 South Stalmine		Y	Support revised site boundary and flexibility in relation to education provision.	n/a	Noted.
0953/M/05/C	Telereal Trillium	MM/060	SA1/11 - North of Norcross Lane, Norcross	KDC6	Y	The current reserved matters application and Clarke House planning application propose 224 no. dwellings combined and further applications on the residual, excluding the part of the site which benefits from detailed planning permission for retail and leisure development, could deliver at least 14 no. further dwellings and potentially more than 90 no. units if sheltered housing / retirement apartments were delivered. Whilst the Site Capacity is a minimum figure, the figure should be increased to 330 dwellings to take account of this potential.  In addition, a minor further revision is required to KDC6 as the proposed wording is incorrect in light of the current planning and reserved matters applications and the consultation responses received from the local highway authority and Highways England, which both raise no objection to the proposed means of vehicular access to the proposed residential part of the site from the existing access on White Carr Lane.	Amend Site Capacity to read; 330 dwellings  Amend Site Delivery to read; (Planning reference 17/00268/OULMAJ)  Amend KDC6 to read; "New and/or retained accesses from White Carr Lane and Norcross Lane will be required."	In relation to the site capacity, see response above in relation to MM/049.  In relation to site delivery, planning application 17/00268/OUTMAJ received planning permission in April 2018 to vary four planning conditions associated with planning application 13/00200/OUTMAJ. The site delivery commentary should only refer to the outline planning permission (13/00200/OUTMAJ) that covers the majority of the site, reference to a subsequent permission that varies four of its planning conditions is not considered necessary as they do not materially alter the extent of the planning permission.  KDC6 does not inhibit access from White Carr Lane in addition to Norcross Lane. <b>Following subsequent planning applications for residential development that agreed access to the residential development, KDC6 is superfluous and the Council proposes a further amendment to delete KDC6.</b>
0659/M/02/C	Inskip-with-Sowerby Parish Council	MM/062	SA1/13 Inskip Extension	KDC1	N	An additional 155 dwellings will destroy the essential character of the rural settlement, is not reasonable, and is NOT JUSTIFIED. The Parish Council agree with Para. 30 and Para. 31 of the Planning Inspector's Post Hearing Advice (Main Modifications) and assert that the revised allocation for Inskip is not in accordance with the Inspectors Post Hearing Advice (Main Modifications). The proposed growth represents a 77% increase which is a massively disproportionate and unsustainable scale of development. The lack of local infrastructure makes the level of development proposed at Inskip unsustainable and NOT CONSISTENT WITH NATIONAL PLANNING POLICY. The proposed expansion of Inskip fails the criteria set at Para. 6.27 of the "Wyre Local Plan Issues and Options" in June 2015 at which time the Parish Council advised that any expansion should be restricted to approximately 50 additional dwellings. As stated in our submission to the Publication Draft Wyre Local Plan, the Inskip Extension proposal is unsustainable owing to concerns with highways (i.e. highway loads, deep ditches, volume of traffic and accidents etc.), lack of local infrastructure and services (i.e. health, shop, limited bus routes etc.) and job opportunities (i.e. commuting, no train station etc.) Concern also raised regarding wording of KDC1 which states that "the development should incorporate a small village green". Inskip-with-Sowerby Parish Council feel that a proposal for a "small" village green does not match the Parish Council vision which has been discussed with Wyre Council a number of times (inc. email dated 7th November 2016). KDC1 also states that "the land immediately to the west of the school should only be used for an extension to the primary school". This infers that land immediately to the north of the school might be used for housing development which has not been discussed.	1) The Wyre Local Plan needs to offer a level of development that is sustainable and is commensurate with the extremely modest infrastructure delivered in this remote rural setting – up to 55 additional dwellings maximum rather than the current proposed 155 additional dwellings;  2) Key Development Consideration (1) to be amended to read: "The development should incorporate a small-village green. The land immediately to the north and west of the school should only be used for an extension to the primary school" in order to allow the Main Modification to accurately reflect the vision proposed for Inskip.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south west of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site.  The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply.  The reference to a "small" village green is appropriate taking into account that 55 dwellings in the allocation already have planning permission.  The comment regarding the land to the west of the school does not relate to a proposed modification. That part of KDC1 is as was set out in the Publication draft Local Plan.
0962/M/02/C	Metacre	MM/062	SA1/13 Inskip Extension		Y	The proposed main modification would help to deliver the borough's housing needs in a positive and sustainable manner. Initial survey work on the amended allocation demonstrates that the proposed number of dwellings can be delivered whilst avoiding the pipeline (INS_07) and area of flood risk.	n/a	Noted.

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0987/M/03/C	Elaine Deegan	MM/062	SA1/13 Inskip Extension		N	<p>In relation to the allocation of SA1/13 at Inskip:</p> <p><b>Not positively prepared</b> - there is no agreement with adjoining Fylde authorities on housing needs. The proposed development of 70 dwellings to the south of Inskip village is unsustainable due to the lack of infrastructure, services and facilities as confirmed by the Planning Inspector in his July 2018 Advice Note.</p> <p><b>Not Justified</b> - the approach to Inskip taken in the MMs reflects a lack of any strategy, a failure to propose any reasonable alternatives to the new site allocation proposed for 70 homes and is based on no further evidence other than that considered at the examination and there rejected by the Inskip community then confirmed by the planning Inspector in his Advice Note.</p> <p><b>Not effective</b> - there has been a failure of Wyre Council and adjoining Fylde area councils to agree over a period of many years about housing land supply issues and other matters including the priority for strategic investment in infrastructure, services and facilities across the Fylde peninsula which has not resulted in effective plan making or decision making. The issues have been well documented in the Local Plan process and show a failure to comply with this requirement.</p> <p><b>Not consistent with national policy</b> - The Plan should enable delivery of sustainable development in accordance with policies in the framework (NPPF 2018). In the case of Inskip, The Planning Inspector in his July 2018 Advice Note identifies a number of adverse impacts that would arise from this allocation and that cumulatively these adverse impacts indicate that the scale of allocations would be too large. We would agree with his comments in full and would request the Borough Council to do likewise.</p> <p><i>[continued on the next line]</i></p>	<p>Amend the allocation capacity to reflect existing permitted schemes (82 dwellings).</p> <p>Amend Site Description to read: "The allocation consists of three parcels of agricultural land in a flat topography – to the west of the village."</p> <p>Amend Key Development Consideration 1 to read: Development is limited to a total of 82 dwellings in Inskip due to recognised Planning constraints. The housing allocation comprises land to the west of the village in accordance with an extant planning permission under course of construction. The three parcels should be considered as a single site to be brought forward in line with a masterplan to be produced covering the whole allocation. The masterplan must be agreed by the local planning authority prior to the granting of planning permission for any part of the site. The land immediately to the west of the school should only be used for an extension to the primary school. The development should incorporate an appropriate and dedicated access to the farm to the south and south-east of the School.</p> <p>Omit any reference to the village green or its siting.</p>	<p>In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply. The site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development. This representation provides no new evidence to suggest that development of the Dead Dam Bridge site would be inappropriate. The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either site of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest".</p> <p>The capacity of the Dead Dam Bridge portion of the allocation was calculated using the same methodology as other allocations in the Local Plan and assumes no housing is built in the Flood Zone.</p> <p><i>[continued on the next line]</i></p>
						<p><b>0987/M/03/C continued</b></p> <p>The proposed allocation is out of scale with the existing village and does not reflect the Inspector's Advice that any allocation should be modest. The allocation of land at Dead Dam Bridge is not a specific modification requested by the Inspector (it is outside of the scope of his suggested Main Modifications and therefore of questionable legality), it has not been subject to community consultation, and is contrary to the constraints identified by the Inspector. There is no evidence demonstrating how the figure of 70 extra dwellings has been derived.</p> <p>Village green - the local plan should not be specific in directing that the village green should be located at the northern end of the village.</p>	see above	<p><b>0987/M/03/C continued</b></p> <p>The Local Plan is not specific as to the location of the village green which is a matter for the masterplan. The Council considers that a small village green is still appropriate and reference should not be omitted as suggested by the representor.</p>
0995/M/002/C	Paul Desborough, IRAG	MM/062	SA1/13 Inskip Extension		N	<p>Revised allocation is not in accordance with the Inspector's Main Modification at para. 31 of his Advice which calls for a modest allocation based on existing permissions. Allocation of 155 dwellings is a two thirds increase in the size of the village. The 27 already under construction brings the figure to 182 - a 77% increase in the housing stock. These figures are not "modest" and will leave the Inspector's concerns intact. Although the Inspector invites the council to consider the allocation of INS_07, this not a recommended Main Modification from the Inspector. Wyre council have taken this suggestion and interpreted it in an unacceptable and misleading way which might be illegal. The allocation of 70 dwellings is not "modest" and there is no justification as to its appropriateness for the village. It has been introduced in haste without full consideration of the circumstances and history of the site which was put forward to Wyre council by the Parish council as a key community resource (attachment included). No consultation has taken place. Has been imposed out of the blue. It is a major change not subject to public examination.</p>	<p>Delete INS_07. The Parish Council and local community should be consulted as to the best value use for the site. The Parish Council's Vision should be reinstated.</p> <p>Amend site capacity to reflect the existing residential permissions.</p> <p>Amend the site description and KDC 1 to refer to three parcels.</p> <p>Amend KDC9a and no longer relevant as it applies to the deleted part of the allocation and KDC9d which relates to the area (INS_07) suggested for deletion.</p>	<p>In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The Inspector asked the Council to consider this site in light of his conclusions about Inskip. The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either site of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest".</p> <p>The Dead Dam Bridge site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development. Furthermore the additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply. The inclusion of site INS-07 in the allocation is part of MM/062 and hence is subject to the MM public consultation.</p> <p>The Council does not consider that new issues have been raised in relation to allocation of INS_07 to warrant debate at hearing sessions.</p> <p><b>The council accepts that KDC9a has been included in error and should be deleted as it no longer impacts on the allocation as proposed to be modified.</b></p>

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1015/M/02/C	Philip James	MM/062	SA1/13 Inskip Extension		N	Proposed 155 dwellings does not accord with the Inspector's advice for a "modest" increase. Is in addition to 27 already approved. Lack of or limited social and public transport infrastructure. Lack of employment opportunities. Forcing people to travel by car.	The 55 dwellings approved is sufficient - enough is enough. There should be more robust protection for land for education purposes abutting St Peter's school - protection should extend to land immediately east of the school. The school is a vital part of village life the protection of which in the short and long term should not be underrated or undermined.	In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south east of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site. The Inspector asked the Council to consider this site in light of his conclusions about Inskip.  The Inspector considers that an allocation of the land that has planning permission (55 dwellings) (and now under construction) together with the land either side of the school to be a "modest" scale of development. The land to the east of the school can accommodate about 30 dwellings which results in a total of 85 dwellings in that part of the village. The 70 additional dwellings at Dead Dam Bridge is therefore also correspondingly "modest".  The provision for a new school at Inskip (KDC7) has not been amended by MM/062
0363/M/09/C	Jessica Bond, Taylor Wimpey UK Limited	MM/065	SA1/16 West of Cockerham Road, Garstang	KDC8	N	Support the MM, and the extension of the allocation boundary and the inclusion of land to the north and west. Supports the inclusion of additional text into KDC 8, which states: "If the Local Planning Authority is satisfied that land is not needed as a result of approved school expansions to provide sufficient additional places at local primary schools to address the impacts of developments in Garstang and surrounding area, a contribution should be made towards the expansion of existing school." As set out in the response to the MIQs, TW commissioned an Education Report to assess the capacity of the existing primary schools within the catchment area for the site. Garstang Community Primary is considered a large enough site to accommodate a three-form entry school that has the capacity to accommodate up to 630 places. There is a combined surplus capacity of 73 primary school places within Garstang Community Primary School, Garstang St Thomas Primary School and, St Mary's and Michael's Primary. Given the existing potential capacity within Garstang Community Primary, and its capability of being expanded, securing financial contributions towards its upgrading is a far more effective way of meet the identified need, than developing and creating a standalone single form entry new school. Extending Garstang Community Primary School would be more logical than a new separate school - infrastructure is in place to facilitate its operation together with a management system. Furthermore, it would be difficult to establish a new school in such proximity to Garstang Community Primary School which is already well established. In this context, it is not necessary to expect the allocation to make the provision of land for a primary school. There is no evidence to justify why land for a new primary school needs to be made available on the allocation. Furthermore, there is existing capacity within other primary schools included within the catchment area, and there is the opportunity to extend Garstang Community Primary, utilising contributions made from S.106 Agreements.	TW recommends the following amendment to MM/065 to read: "A financial contribution is made towards the expansion of Garstang Community Primary School"	No new evidence has been submitted. MM/065 was put forward following discussions at the hearing. KDC8 as proposed to be amended provides flexibility in the Policy. The suggested amendment to MM/065 is too prescriptive and inappropriate. Whether a school is needed is a matter for the Masterplan.
0458/M/02/C	Cabus Parish Council	MM/065	SA1/16 West of Cockerham Road, Garstang		N	We are disappointed that Wyre Borough Council has amended the Settlement Boundary to the West of Cockerham Road to accommodate an increase to the site allocation area of SA1/16 (from 5.81 to 14.52 Hectares) and site capacity (from 100 to 260 dwellings). We feel there is a justified argument to be made NOT to include MM/065 and MM/103 on the following basis: 1. that the latest (2016) Household Projections suggest a 12.5% reduction compared with the 2014-based projections – the proposed site capacity increase from 100 to 260 is excessive and unnecessary 2. that it is highly unlikely that the delivery of a new Primary School would ever materialise on SA1/16, even if the suggested justification for increasing the site area is to accommodate such a facility 3. "The larger site is being promoted by a national housebuilder". Clearly the Planning Inspectorate has access to information which we, as consultees, don't - but the wishes (or promotional activities) of national housebuilders should not be dictating our site allocations for Local Planning purposes	Amend Site Area to read – as per original draft: "5.81 14.52 Hectares" Amend Site Capacity to read – as per original draft: "100 260 dwellings"	The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). Household projections are not housing requirements and it cannot be assumed that the projections translate to a specific implication for a particular site. The amendment to KDC 7 regarding the need for a new primary school on-site has been made in consultation with the Local Education Authority and should not be read as meaning that a new school will not be provided. Advice of the LEA will be sought as part of the Masterplanning process. The site was promoted by Taylor Wimpey through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.
0545/M/16/C	Garstang Town Council	MM/065	SA1/16 West of Cockerham Road, Garstang		N	Though not in the parish of Garstang this and other sites to the north and the south have significant impact on services and the environment that have been overlooked. We are extremely concerned that it is now proposed to allocate 260 homes on this triangular site in a quiet clearly rural backwater of the borough especially as the land immediately to the south fronting the A6 has permission for 269/270 a combined total of in excess of 500 homes and 1,000 families and associated vehicles. Although these sites are partly justified by the comment that they are only half a mile from Garstang centre, i.e., walking distance it should not be forgotten that even if speed limits are reduced the volume of traffic on the A6 is such that if you wish to live to a ripe age you do not attempt to cross it. This site fails the test of cohesion with its parent community and its impact on the landscape and its special quiet and highly valued Nateby Crossing Lane.	n/a	The Inspector has concluded that it is appropriate to extend allocation SA1/16 to accommodate an additional 160 dwellings. Garstang is a sustainable settlements with a range of services and facilities and employment opportunities.

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1058/M/02/C	Barbara Sumner	MM/065	SA1/16 West of Cockerham Road, Garstang		N	I support the building of a new school but have concerns regarding its access and surrounding traffic issues. 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. This will create a potentially hazardous traffic situation as this junction is already very busy and will only get worse with new development, especially at peak times.	The solution to this traffic problem is to use the proposed roundabout from the adjacent development 'Land West of A6 16/00241/OULMAJ' as an access route to the new school. 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 preventing further congestion turning right at the Cockerham/ Croston Road traffic light junction	The comments are not sufficiently specific to the change proposed by the Main Modification. A new school was proposed on this site in the 'publication' draft Local Plan. An appropriate access to the new school will be determined as part of the Masterplanning process for the site and it is a consideration that could be raised in relation to the Masterplanning process for site SA3/5. It should be noted that the A6 Corridor Highway Mitigation Strategy includes improvements to the Cockerham / Croston Road traffic light junction (initiative 2).
0545/M/17/C	Garstang Town Council	MM/066	SA1/17 Land South of Prospect Farm, Garstang		N	The increase in homes is justified entirely on the basis of having to find additional numbers rather than for reason of an attractive site lay out with room to breathe and move. The site will become indistinguishable from any other.	n/a	The Local Plan includes policies to ensure that development is of high quality
0947/M/01/C	J and R Parkinson	MM/066	SA1/17 Land South of Prospect Farm, Garstang		N	There is scope to enlarge the proposed allocation by including the adjoining land with a capacity of up to 50 no. dwellings. The Inspector considers the A6 highway constraint as overstated such as that additional growth can be supported at Garstang. The Plan is not sound as submitted and main modifications are needed to make it sound, the Inspector is clear in his Post Hearing Advice note that; 1. The failure to plan for enough new housing is a key concern; 2. The OAN is a robust figure and the Local Plan must do all it can to meet identified housing need; 3. Garstang is a sustainable and suitable location for housing growth; 4. New housing delivery can be focused in sustainable locations with good public transport including Garstang within the A6 Severe Restriction Zone. 5. There is scope for a 'modest increase' in housing growth in Garstang based on the current highway evidence base but this is not quantified as an additional number of houses beyond the proposed Main Modifications MM/066 and MM/065. We support the increase from 53 to 70 but there is an opportunity to increase to 120 dwellings. This differs to the approach taken in respect of SA1/16 and MM/065 where the allocation has been maximised. A further modification to MM/066 should be made as site SA1/17 is suitable for housing development, is available and can be delivered. Builders have expressed interested. This would enable the adopted Local Plan a greater proportion of the OAN to be delivered and reduce the unmet need to be deferred to the Local Plan Review.	It is requested that the boundary of the proposed housing site allocation SA 1/17 - Land south of Prospect Farm, west of the A6, Garstang is modified on the Policies Map to include the omitted land to the south (identified on the plan accompanying our representations in response to the Publication Draft Local Plan) as the residual frontage part of SHLAA site ref. GST_74.  The omitted land has a capacity of up to 50 no. dwellings which would increase the capacity of the modified allocation from 70 no. (per MM/066) to 120 no. dwellings.	The Inspector has not directed the Council to look at making additional allocations. This is a matter for the review of the Local Plan.
0545/M/18/C	Garstang Town Council	MM/067	SA1/18 South of Kepple Lane, Garstang		N	Kepple Lane has experienced perhaps the greatest change since the present plan was approved in 1999. It is a narrow road with twists and turns and a very busy medical centre half way down on the south side. It does not lend itself to traffic measures and the primary school and the unsighted canal bridge are serious points of conflict between children, pedestrians and vehicles. Additional allocations have no justification and they fail the Vision test.	n/a	The amendment to the capacity of site SA1/18 (MM/067) reflect the two permissions on the site.
0962/M/03/C	Metacre	MM/079	SA3 Mixed Use Development		N	Additional highway assessments undertaken as part of planning applications may demonstrate that additional housing can be delivered within an allocation boundary. This being the case, it would be unjustified to limit the capacity of allocations to the "total" identified in the table. Site capacity is a technical issue to be considered on a site by site basis. Plan wording should be more flexible to allow more houses to be delivered where acceptable and subject to local plan policies and material considerations.	Change "Total Site Capacity" to "Anticipated Delivery". It should be clarified that the identified capacity is not a ceiling to development.	The terminology "Total site capacity" is not subject to a Main Modification.. Modification MM/005 makes it clear that the housing delivery of 9,285 dwellings over the plan period is a "minimum". Hence site capacities may be greater than shown in the plan depending on the relevant material considerations.
0676/M/05/C	Environment Agency	MM/080	SA3/1 Fleetwood Dock and Marina	KDC4	n/a	There is a typing error in this text ('change' should be 'chance'), However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended appropriate 'design flood' of <0.5%-change-of-flooding level plus an allowance for climate change for the life of the development.	See summary.	<b>The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.</b>  <b>The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "An FRA must be carried out and t The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of &lt;0.5% change of flooding level plus an allowance for climate change ...."</b>



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0962/M/04/C	Metacre	MM/082	SA3/3 Land West of Great Eccleston	KDC7	N	Allocation fully supported, but two concerns: 1) the terminology of "site capacity" should be more flexible to allow for a greater number of dwellings to come forward where acceptable. 2) the requirement for home owner packs in unnecessarily onerous given the distance between the site and Morecambe Bay, with no direct link.	Change "Total Site Capacity" to "Anticipated Delivery". It should be clarified that the identified capacity is not a ceiling to development. Delete reference to home owner packs.	The terminology "Total site capacity" is not subject to a Main Modification. Modification MM/005 makes it clear that the housing delivery of 9,285 dwellings over the plan period is a "minimum". Hence site capacities may be greater than shown in the plan depending on the relevant material considerations.  The requirement for home owners' packs is justified as there is the potential for an increase in recreational pressure on Morecambe Bay European Site associated with an increase in housing within 3.5km of Morecambe Bay. This mitigation measure is included within the suite of measures identified in the Local Plan Habitat Regulation Assessment Report (HRA). The HRA concluded that there would be no adverse impact on the integrity of Morecambe Bay with appropriate measures in place and this conclusion has been agreed with Natural England. Homeowner packs are also a requirement by Natural England and this has also been conditioned to relevant planning permissions, such as at SA1/12 Land at Arthurs Lane, Hambleton (planning application 16/00217).
0358/M/04/C	Hollins Strategic Land	MM/083	SA3/4 Forton Extension		N	<b>Site area</b> - this should be extended to include land south of Sunnybank Nurseries for employment use as opposed to the location suggested by the council. Reasons include it would adjoin an existing employment use and cafe, there is limited employment use at Jesmond Dean (the area of the council's preferred location), the employment parcel can come forward independently of the rest of the allocation, land at the council's preferred location is required to manage drainage, employment in the council's preferred location will not deliver an attractive gateway, the council's preferred location would require residential development to be accessed through an employment site, parcel E provides greater flexibility in terms of suitable employment uses, parcel E to the south has the advantage of a lack of conflict with adjoining land uses and parcel is will be accessible to the neighbourhood centre. <b>Use</b> - this should reflect the uses required by the Key Development Considerations (KDCs). <b>Housing capacity</b> - the attached masterplan demonstrates delivery of circa 363 dwellings. This should be reflected in the site capacity (as a minimum figure). <b>Site delivery</b> - the council should acknowledge that the requirements of the masterplanning process will delay delivery. The council should confirm where each of the required uses should be located, including the location of employment within land to the south of Forton. <b>Site description</b> - the individual land parcels should be individually designated (A, B C etc) <b>KDC1</b> - The masterplan requirement should be removed or the requirements of the council's guidance should be reduced. The requirement to avoid ransom strips should be rolled out across all other allocations.  <i>(continued on the next line)</i>	See summary.	<b>Site area</b> - the Council considers that the greater benefit arises from locating the employment element close to the main area of housing growth, close to facilities in the new neighbourhood centre (which it will support and is likely to be significantly closer to than parcel E) and close to the A6, whilst maintaining the full integrity of the Strategic Area of Separation between Forton and Hollins Lane south of Sunnybank Nurseries. The council considers that there is no justification for assuming that employment and residential uses cannot be located in proximity to each other off School Lane nor that the relationship between the uses, including access points, cannot be appropriately designed, nor that the development of employment uses in the council's suggested location will hinder the delivery of the allocation, or will employment be restricted in terms of end use. The matter raised regarding drainage is one of detail. The council has no access to the technical information behind the masterplan and as such is unable to provide any necessary challenge. Although the submission appears to suggest that the landowner supports the use of this land for employment use, no evidence has been supplied to support this position and the submission made on behalf of that owner to this Modifications consultation (0785/M/01/C) does not make any such support clear. The council has considered the arguments put forward in the attached "masterplan" in favour of allocating the land to the south for employment, but finds no compelling reasons for amending the allocation as proposed to be modified that override the sustainable benefits of locating the employment use at the Village. <b>Use</b> - 'Use' is not the subject of an MM. Site SA3/4 is correctly allocated for mixed employment and residential uses. Other uses required in the KDCs are ancillary. <b>Housing capacity</b> - capacity is a minimum figure. A higher figure that is considered acceptable through the masterplan and planning application stages could be delivered.  <i>(continued on the next line)</i>
						<b>KDC3</b> - the need for a landscape buffer along the A6 stems from concerns relating to the original allocation boundary which has been amended by the Inspector. A buffer will reduce the developable area on the remaining land and is no longer necessary. <b>KDC4</b> - the need for a drainage strategy across the whole allocation is an unnecessary cost, will lead to further delay and is not justified based on information gained as a result of developing the attached masterplan. The need to drain into Morecambe Bay is not supported by evidence, is not justified and should be removed. <b>KDC5</b> - the requirement for the employment element of the allocation to be located at Forton Village has not been subject to a masterplanning process. Land to the south should be allocated instead as set out in the attached masterplan. <b>KDC6</b> - if the council can confirm the location of the employment land it should confirm the location of the school extension land. The education authority should justify the land take required. The seeming need to provide the education provision in advance of development threatens the delivery of the allocation. Land to the north of the village could be allocated to accommodate the additional education provision and would mean a link road through parcel B would not be required. A similar approach has been taken in Stalmine. Alternatively this land could be allocated for residential development. <b>KDC7</b> - The location of the neighbourhood centre should be specified within the allocation. <b>KDC8</b> - This should be made clearer that any development of the recreation ground should lead to no net loss of public open space. <i>(continued on next line)</i>	See summary	The following matters raised by the representor are not matters covered in an MM but new matters which should have been raised at publication stage: - The request for the naming of individual parcels (Site Description); Removal of Masterplan requirement (KDC1) The representor's requirement for Policy SA3/4 to be prescriptive as to the location of the ancillary uses (KDC6). The content of the Council's Guidance on the preparation of masterplans is not a matter of the Local Plan examination.  <b>KDC1</b> - the MM regarding ransom strips was considered necessary following discussions during the hearing sessions and the matter being raised as of particular concern that could affect delivery. Policy CDMP3 criterion f) seeks to prevent ransom strips in general and would apply in relation to the preparation of masterplans consideration of planning applications. <b>The Council does not consider it necessary that the particular requirement is replicated on all allocation policies but would not object if the Inspector considers it appropriate.</b> <b>KDC3</b> - the need for a landscape buffer along the A6 stems from the discussion at the hearing sessions and it is referred to in 'Working list of modifications from Local Plan hearings week 2' (EL5.029). As stated it was agreed at the hearing sessions to revise the wording submitted to the examination (EL5.028) to be expanded to also cover the provision of green infrastructure/buffer along the A6. The buffer is unrelated to the deleted parcel of land and it is still necessary to protect the amenities of future residents with regards to noise and pollution. It is also necessary to lessen the visual impact along the A6.  <i>(continued on next line)</i>

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						<p><b>KDC10</b> - given the fact that the gas pipeline will have no effect on the development, the need to refer to the Health and Safety Consultation Zones is not longer necessary.</p> <p><b>KDC11</b> - seems to infer that only one planning application will be submitted. It should be amended to allow for multiple applications. It is also not necessary to refer to Minerals Safeguarding Areas or Source Protection Zone 3 as the site will be allocated for development.</p>	See summary	<p><b>KDC4</b> - The need for a drainage strategy across the whole allocation was raised by United Utilities (Submissions EL1.009a&amp;b) and a proposed amendment requiring a drainage strategy was submitted at the hearing (EL5.026) and the Council maintain that a drainage strategy for the allocation is necessary to avoid future flooding incidences. The Representor does not explain why a drainage strategy is not justified and does not confirm that consultation with United Utilities on their suggested approach was undertaken. The requirement for the development to drain into Morecambe Bay is a clarification as to the destination of 'existing water courses' previously referred to in KDC4. The updated IDP in Appendix 3 show that existing watercourses in the locality drain into Morecambe Bay via the River Cocker. In essence this is not a new requirement.</p> <p><b>KDC5</b> - the requirement for the location of the employment element at Forton Village stems from the council's response to the Inspector's Post Hearing Advice.</p> <p><b>KDC6</b> - the approach to school provision at Stalmine is different because the existing school cannot expand due to an existing planning permission for development up to its boundary. The allocation internal road system is a matter for the masterplan. Suggested additional land has not been considered through the examination process and is not the subject of a MM.</p> <p><b>KDC8</b> - on the Policies Map the recreational ground is shown as existing GI. Therefore any loss will need to be replaced in accordance with Policy CDMP4.</p> <p><b>KDC10</b> - is still relevant to the allocation as the pipeline remains and as such any advice from the HSE should be taken into account in the development of the allocation.</p> <p><b>KDC11</b> - it is accepted that there is a typing error in KDC11 which should read '...and planning application(s)'. The allocation does not negate the need to take into account the fact that the land lies within a mineral safeguarding area and a Source Protection Zone 3 of abstraction boreholes in preparing the masterplan and any subsequent planning application.</p>
0785/M/01/C	John Carr	MM/083	SA3/4 Forton Extension		N	<p>Removal of land south and east of Sunnybank Nurseries is contrary to the NPPF 2018 para's 7, 10 (achieving sustainable development), 16 and 35 (plan making), section 9 (promoting sustainable transport) and section 12 (achieving well designed places) and hence unsound. The removal of said land will preclude the creation of sustainable links - including improved pedestrian and cycling - between Forton and Hollins Lane. The land occupies a strategic location between the two settlements. The proposed deletion fails to adequately consider "sustainable development". Residents of Hollins Lane would be segregated from the facilities - existing and proposed - in Forton. Would leave existing residents of Hollins Lane almost entirely dependent on car ownership. Disagree with the rationale for the deletion of said land on the basis of coalescence. No set criteria for assessing coalescence. In allocating the land Wyre council considered that development of the land would not create coalescence. The council sought to mitigate concerns about coalescence through the suggested provision of green infrastructure prior to the commencement of hearings. Forton and Hollins Lane are physically separated by the A6. The scale of the two settlements and distance between them is so slight that typical coalescence concerns are not applicable. Lack of any distinctive character or style within the locality which would warrant the need for segregation. Developing the land would still provide the scope to prevent unacceptable visual and physical coalescence. Facilitating sustainable development outweighs the need to preserve the separation between Forton and Hollins Lane. Further, the land is considered to be the most logical for community service provision given its equidistant location.</p>	Allocate the land proposed to be removed.	The Inspector has considered the all written and oral evidence, pre and during the hearing sessions in relation to the soundness of the allocation in policy SA3/4 and concluded that the allocation of the subject land is contrary to the principles of soundness and should be removed from the allocation.
0676/M/06/C	Environment Agency	MM/085	SA4 Hillhouse Technology Enterprise Zone, Thornton	KDC3	n/a	<p>There is a typing error in this text ('change' should be 'chance'). However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance:  Finished floor levels must be above the undefended appropriate 'design flood' of &lt;math&gt;\leq 0.5\%&lt;/math&gt; change of flooding level plus an allowance for climate change for the life of the development.</p>	See summary.	<p>The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.</p> <p>The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state –  "An FRA must be carried out and the results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended appropriate 'design flood' of &lt;math&gt;\leq 0.5\%&lt;/math&gt; change of flooding level plus an allowance for climate change ...."</p>

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0676/M/07/C	Environment Agency	MM/086	SA5 Port of Fleetwood	KDC2 KDC (NEW)	n/a	<p>1. There is a typing error in this text ('change' should be 'chance'), However we would suggest that the following wording is used for this sentence instead as the design flood is defined in the national Planning Practice Guidance: Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <del>&lt;0.5% change of flooding level</del> plus an allowance for climate change for the life of the development.</p> <p>2. We wish to clarify that Copse Brook is a culverted non-tidal Main River and that the 16 metre easement is in relation to the top of the bank/quay wall of the River Wyre and landward toe of any Environment Agency tidal flood defences. As such, we would suggest the new text should be revised as follows: The River Wyre and Copse Brook are designated Main Rivers and subject to the requirements of the Environmental Permitting (England and Wales) Regulations 2016. An Environmental Permit from the Environment Agency is therefore required for any proposed works or structures in, under, over or within 8 metres of the edge of the Copse Brook culvert, and 16 metres of the top of the bank/quay wall, or landward toe of the Environment Agency flood defences, of the tidal River Wyre...</p>	See summary.	<p>The Council agrees that there is a typing error and it should read 'chance'. The Council agrees that there is a typing error and 'this' should not be identified as a strikethrough in the schedule.</p> <p>The Council suggest that a further amendment to KDC1 would be appropriate to reflect the Environment Agency's wording and state – "<del>An FRA must be carried out and t</del> The results of the FRA must be used to take a sequential approach to site layout. Finished floor levels must be above the undefended <u>appropriate</u> 'design flood' of <del>&lt;0.5% change of flooding level</del> plus an allowance for climate change ...."</p> <p>The Council suggest that a further amendment would be appropriate to state – "<del>KDC2. The River Wyre and Copse Brook are</del> is designated Main Rivers. The prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the edge of the Copse Brook Culvert, and 16 metres of the top of the bank/quay wall, or landward top of the Environment Agency flood defences, of the tidal River Wyre. An open space buffer should be provided to protect the watercourse from detrimental impacts.</p>
0032/M/06/C	Blackpool Council	MM/089	Monitoring the Local Plan		N	<p>MM/089 indicates that 464 dwellings per annum can now be delivered in Wyre. This is a deficiency of only 3% on the original 479 figure and falls well within the OAN range of 457 – 479 dwellings per annum identified in paragraph 7.36 of ED088 (Wyre Addendum 3: OAN update – September 2017). As Wyre are now able to deliver a housing figure that is within the identified range we do not consider that a shortfall exists.</p> <p>Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.</p>	<p>Delete reference to meeting 97% of the OAN.</p> <p>Acknowledge that a review of local housing need may be required to reflect this change to national policy.</p>	<p>The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. Reference to meeting 97% of the OAN is factually correct. Since the Local Plan can only deliver 464 dwellings per annum there is therefore a deficiency of 3% against the 479 figure which has been accepted as the OAN. It is irrelevant where in the OAN range the 464 figure falls.</p> <p>It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs. This will be carried out in line with published guidance at the time.</p>
0290/M/06/C	Fylde Council	MM/089	Monitoring the Local Plan		N	<p>The housing requirement figure of 464 dwellings per annum falls within the OAHN range. It therefore does not result in a shortfall in meeting the OAHN. This approach was confirmed through the Examination of the Fylde Local Plan. However the Wyre Local Plan as modified at present includes a requirement for an early review predicated on 464 being insufficient to meet the OAHN over the plan period, with a deficiency of 3% of the original 479 figure. This appears inconsistent with the approach taken by the Inspector of the recently-adopted (22nd October 2018) Fylde Local Plan to 2032.</p> <p>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.</p>	Reference to the proportion of the OAHN requirement should be removed altogether rather than altered to 97%.	<p>The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. In such circumstances the Council would not have been required to commit to an immediate partial review through a policy in the Local Plan. 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 OAN housing figure. He refers to the figure of 479 as the OAN. Reference to meeting 97% of the OAN is factually correct. The approach taken by the Inspector examining the Fylde Local Plan is different in that the Inspector accepts a range rather than a figure in defining the OAN. This does not mean that it is the only and most appropriate approach. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.</p>
0297/M/10/C	Home Builders Federation	MM/089	Monitoring the local plan		Y	The HBF is generally supportive of the proposed modifications particularly reference to the Housing Implementation Strategy and the Local Plan Review.	n/a	Noted.
0645/M/012/C	Nether Wyresdale Parish Council	MM/089	Monitoring the Local Plan		Y	The Parish Council supports the proposed 'housing position' and the comment that states "This Local Plan includes sufficient land to meet identifies needs in the first five years post adoption".	None.	Noted.
0808/M/15/C	Story Homes	MM/089	Monitoring the Local Plan	Para. 10.4.2	Y	Supportive of the additional text at sections 10.2 to 10.4. Paragraph 10.4.2 needs to clarify that the early review needs to be submitted for Examination by early 2022 in line with the Inspector's comments.	Clarify para. 10.4.2.	Policy LPR1 refers to the submission for examination by early 2022 hence no further amendment is required.
1060/M/09/C	Carrick Sports Ltd	MM/089	Monitoring the Local Plan		Y	Support for the proposed early local plan review but cautions against using the current standard methodology which may be amended by the government.	Allocate land at Calder House Lane for residential development.as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.	<p>As part of the immediate review the council will consider government guidance relating to the calculation of housing need extant at the relevant time.</p> <p>The proposed site at Calder House Lane has not been considered through the examination process and is not the subject of a modification. It is therefore inappropriate to consider its allocation at this stage.</p>

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0032/M/07/C	Blackpool Council	MM/090	LPR1 Wyre Local Plan Review		N	If there is no shortfall in the OAN, this would bring into question the need to for a partial review of the plan as set out in MM/090 (and referred to in MM/002, MM/003 and MM/089).  Under the new standard methodology there would be no shortfall in housing delivery in Wyre. The introduction of the standard methodology is a significant policy change and will need to be considered as part of any partial review process.	Acknowledge that a review of local housing need may be required to reflect this change to national policy.	The 'shortfall' is determined by considering the housing figure against the OAN figure and not the OAN range as established in the evidence. To suggest that there is now no shortfall because the Local Plan housing figure falls within the OAN range is wrong. This position is aligned with the Inspector's position that a shortfall exists and that an immediate partial review is necessary. It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0290/M/07/C	Fylde Council	MM/090	LPR1 Wyre Local Plan Review		N	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 the review to accord with the new standard methodology should be acknowledged within the modifications.	It is clear in Policy LPR1 – Wyre Local Plan Review that the review will include an update of Objectively Assessed Housing Needs.
0297/M/11/C	Home Builders Federation	MM/090	LPR1 Wyre Local Plan Review		Y	The HBF are supportive of the identification of the need to review the plan and the identification of clear timescales for that to happen.	n/a	Noted.
0358/M/05/C	Hollins Strategic Land	MM/090	LPR1 Wyre Local Plan Review		N	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. If, as the highway authority expects, the review finds housing cannot be accommodated on the highway network, Fylde will need to review their plan with consequent delay in delivery. Option 1 put forward by the Inspector would mean unmet need being delivered quicker and would represent a positive planning solution.	n/a	It is accepted in case law that a local plan can be found sound taking into account an immediate partial review, [Grand Union Investment Ltd v Dacorum BC (2014)]. In any event whether the Council reviews or suspends the Plan is a matter for the Council to decide and it is not part of the consultation on MMs. As concluded by the Inspector, the review provides an appropriate mechanism to address soundness.
0363/M/10/C	Jessica Bond, Taylor Wimpey UK Limited	MM/090	LPR1 Wyre Local Plan Review		N	TW has concerns regarding the Council's unmet need. However, it supports the Inspector's recommendation to build an early review mechanism into the Local Plan as a measure to ensure that the Council can address its unmet need. This is on the premise that an early review is carried out at the appropriate time. TW has concerns that commencing the partial review straight so soon after adoption is unrealistic. It recommends that a revised timetable is prepared which considers the adoption date of the Local Plan and forecasts a reasonable timetable for the preparation of a review. Furthermore, in preparing the review of the WCLP, the Council should seek to ensure that its remaining unmet need is met within the HMA through effective cooperation and a robust duty to cooperate strategy.  Overall, TW has some concerns regarding the effectiveness of MM/090. That said, although not the preferred strategy, the Council's proposed mechanism for undertaking an early review of the plan offers an appropriate way forward to ensure that the Local Plan can be adopted at the earliest opportunity and replace the WCLP which has been time expired since 2006.	TW recommends the following amendments: - A revised timetable is published for the preparation of the Local Plan review. The timetable proposed in MM/002 is unrealistic and requires the Council to have commenced its review immediately, post adoption of the WCLP; - Additional text is input into MM/090 which sets out that the Council will seek to meet its unmet needs through early and effective cooperation with the other authorities included within the HMA, and that it will engage in a robust duty to cooperate.	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. The DiC will apply to the review of the local Plan. No further text is necessary.
0794b/M/07/C	Wainhomes	MM/090	LPR1 Wyre Local Plan Review		N	Acknowledge the potential benefits arising from the incorporation of a Local Plan Review mechanism e.g. securing a plan-led system. However, it would only serve a meaningful planning purpose where the plan secures a robust 5-year housing land supply and developable supply over the plan-period; otherwise, the plan is likely to become out-of-date shortly after adoption and the benefits of incorporating a Local Plan Review mechanism will not be realised.  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. However, the Council's 5-year housing land supply position upon adoption of the emerging local plan would be marginal and against the less onerous revised and PPG. It is not clear that the Council has exhausted all options to ensure that a more robust 5-year housing land supply could be achieved.	In terms of the actual wording Policy LPR1 of the Local Plan, we would suggest that the wording should be revised to emphasise that the OAN should be met in full as a minimum; the OAN should not represent a ceiling to housing development. In terms of part 2 of this policy, the review of the transport and highway issues should fully reflect the concerns raised by the Inspector at paragraph 13 of his Report e.g. the modelling should be more robust and LCC's approach to severe congestion should be reviewed. It is not sufficient to simply say that the Council will undertake a review of housing and highway scheme commitments as per 2(i, ii, iii and iv) of this policy; this policy should provide sufficient confidence that the Council will undertake a thorough review of the evidence base with regards to highways constraints alongside LCC.	The Local Plan when adopted will have a five year land supply. The Representor provides no new evidence to indicate why the Local Plan will become out of date soon after adoption. It is also not reasoned why the Local Plan review will not be realised. The suggested alterations to Policy LPR1 are not meaningful or appropriate. Whether the updated OAN is met in full would be a matter of consideration by the review based on updated evidence. The proposed policy is sufficiently robust and detailed.
0808/M/16/C	Story Homes	MM/090	LPR1 Wyre Local Plan Review		Y	Supportive of Policy LPR1.	None.	Noted.
0902/M/05/C	Pipecroft Ltd	MM/090	LPR1 Wyre Local Plan Review		N	There are significant concerns about an early review of the Local Plan and in particular the timescales for the review. As the LPA has accepted that the current proposed Local Plan will not meet the OAHN for the borough, the review should take place as a matter of urgency. Even with the Main Modifications proposed, the Local Plan will not meet the identified housing needs of the borough. If the review of the Local Plan is not submitted until 2022, for at least 3 years the borough will be operating with a Local Plan which does not meet the identified OAHN, this could have significant implications for the delivery of housing.	Our view remains, that Option 1 in the 'Inspector's Post Hearing Advice – Main Modifications and Related Matters' (paragraph 11) would be more appropriate. This would involve a robust review of the highway and transport evidence at this stage. This would ensure that when that the Local Plan is sound when it is adopted and would not require early review. If policy LPR1 is included point 3 the requirement should be for the allocation to sites to meet the OAHN should be the minimum.	Whether the Council review or suspends the Plan is a matter for the Council to decide and it is not part of the consultation on MMs. As concluded by the Inspector, the review provides an appropriate mechanism to address the small shortfall of less than a year's supply.

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Table 5b - Summary of Local Plan Representations (Soundness) By Mod/Part of Plan/Policy (Main Modification Reference Order)								
Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0941/M/03/C	Gladman Developments Ltd	MM/090	LPR1 Wyre Local Plan Review		N	<p>Welcome the inclusion of MM/090 which requires a review of the WLP to meet its OAN in full.</p> <p>The Council will be aware of the changes made to national policy with regards to the introduction of the standardised methodology for calculating housing needs. The standardised methodology represent a starting point as it only provides the base requirement and the minimum levels of housing need that is required. In undertaking a review of housing needs, the Council will need to consider the baseline need alongside its aspirations for economic growth and any unmet needs of neighbouring authorities through a statement(s) of common ground. Further, the standardised approach is under review by Government and is subject to further change.</p> <p>Although the principle of undertaking a review is supported, the proposed wording does not require the authority to undertake a review resulting in the estimated time scales potentially slipping. The review should be carried out immediately upon adoption rather than waiting until the end of 2019.</p>	<p>The policy wording should be amended such as that proposed in the North West Leicestershire Local Plan which states:</p> <p>The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed out of date. "</p>	<p>It is not considered appropriate or necessary to adopt the wording from the NW Leicestershire Local Plan. No information is provided to justify the wording of the policy. It is considered excessive to find the whole Local Plan and every policy therein as out of date because of slippage in the review programme. Such outcome does not serve to ensure that development needs are met in a sustainable way.</p>
1060/M/010/C	Carrick Sports Ltd	MM/090	LPR1 Wyre Local Plan Review		Y	<p>Support for the proposed early local plan review but cautions against using the current standard methodology which may be amended by the government.</p>	<p>Allocate land at Calder House Lane for residential development as a sustainable alternative solution to help meet the identified shortfall of 1,183 dwellings across the Local Plan Period.</p>	<p>As part of the immediate review the council will consider government guidance relating to the calculation of housing need extant at the relevant time.</p> <p>The proposed site at Calder House Lane has not been considered through the examination process and is not the subject of a modification. It is therefore inappropriate to consider its allocation at this stage.</p>
0297/M/12/C	Home Builders Federation	MM/091	Monitoring the local plan	Table 10.1	Y	<p>The HBF generally supports the proposed modifications to the monitoring framework, and consider that this will help to ensure that monitoring is more effective.</p>	n/a	Noted.
0072/M/02/C	Thornton Action Group	MM/099	Policies Map SA1/2 Lambs Road/Raikes Road, Thornton		N	<p>Thornton Action Group fully supports the classification of the land between Raikes Road and the Wyre Estuary as Green Infrastructure with the added protection that this gives against development but urge that the area to the south and east of Stanah School which is subject to a covenant be also classed as Green Infrastructure. The Covenant refers to keeping this land for recreational use.</p>	<p>Designate additional land at Stanah as Green as Green Infrastructure.</p>	<p>Support for the designation of countryside as GI at Stanah is noted. The designation of the covenanted land is not subject to a MM and therefore outside the scope of this consultation.</p>
0794a/M/04/C	Wainhomes	MM/100	SA1/9 South Stalmine		Y	<p>Supports the proposed alteration to allocation SA1/9 as a more accessible extension to Stalmine. In control of a major housebuilder which will provide for the delivery of the site.</p>	n/a	Noted.
0953/M/06/C	Telereal Trillium	MM/101	Policies Map - SA1/11 - North of Norcross Lane, Norcross		Y	<p>Telereal Trillium fully supports and agrees that exceptional circumstances have been demonstrated to justify the proposed modification of the Green Belt boundary and corresponding adjustment of the settlement boundary and extent of proposed site allocation SA1/11 so it fully corresponds with the boundary of the land which benefits from outline planning permission ref. 17/00268/OULMAJ</p>	None	Noted.
0654/M/02/C	James Procter	MM/102	Policies Map SA1/13 Inskip Extension		N	<p>Objects to the allocation at Dead Dam Bridge. 1) Ethylene pipeline - easement/space needed for maintenance and repair - see map attached to representation 2) Flood risk - concern about flooding from Upper River Wyre. Recent experience of flood warning resulting from Storm Callum. More housing could magnify the problem - more concrete and less soakaways. Own garden floods in heavy rain. Difficulty of obtaining insurance to cover flood risk as in a flood risk area. Two gas pipelines and flood risk - fail to see how the land can be a suitable place to built 70 houses. Original allocation north of Preston Road on higher ground was a greater distance from the flood zone and is on higher ground.</p>	<p>Original suggestion was that Inskip had a great opportunity to enhance amenities with a village green. Where is this going to be located and what size? Please don't let it become a small grassed area squeezed into the middle of a housing estate.</p>	<p>In accordance with the Inspector's Post Hearing Advice in paragraph 31, the Council has given consideration and decided that a modest allocation can be made on the land to the south west of the village at Dead Dam Bridge. This follows an updated position in relation to the pipeline that crosses the site.</p> <p>The site is identified in the Strategic Housing Availability Study (ED089) as a "final site" (INS_07). It has been discussed in meetings with representatives of the Parish Council (SD007) as a possible location for residential development and a village green. The council consider that the site is suitable for residential development in principle. The landowner has confirmed that it is available for residential development.</p> <p>The additional development will assist in supporting existing and new services at the village and also make a contribution to the overall housing land supply.</p> <p>The land to the south west of Inskip is largely in Flood Zone 1 and has been considered through the Strategic Flood Risk Assessment (ED112) and Sequential Test (EL8.007). Policies exist in the Plan to address flood risk matters. The Key Development Considerations attached to SA1/13 requires housing to be built outside of Flood Zones 2 and 3.</p> <p>The council has confirmed with representatives of the pipeline operator that the easement is 3m either side of the pipeline. The representor has submitted a plan claiming to show an "easement" that is clearly wider than 3m. There is no documentation that supports this contention.</p> <p>A second pipeline is mentioned. There is a high pressure gas pipeline east of the adjacent Lataus Farm. Due to the separation distance it has no bearing on the allocated site.</p>

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Unique Ref	Name/ Organisation	Mod Ref	Part of Plan		Is the Plan sound? Y/N	Soundness - Summary of Representation	Modifications Required	Response
0995/M/05/C	Paul Desborough, IRAG	MM/102	Policies Map SA1/13 Inskip Extension		N	Amend settlement boundary to reflect suggested deletion of INS_07 from the allocation.	See summary of representation.	The council remains of the view that the allocation of the site at Dead Dam Bridge (site INS-07) is justified and appropriate.
0363/M/11/C	Jessica Bond, Taylor Wimpey UK Limited	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		N	<p>TW strongly supports the extension of the allocation boundary and the inclusion of land to the north and west. As proposed, the allocation will see the release of a well contained parcel of land from the open countryside, which presents the opportunity to deliver a sustainable, residential extension to Garstang. The extension of the allocation boundary enables the site to deliver an additional 160 dwellings, which would make a significant contribution towards meeting the need for market and affordable housing within the borough.</p> <p>It is considered that the extension of the draft allocation boundary is justified, as it will see the release of a well contained site, with no overriding technical or environmental constraints, and can be delivered within the first 5 years of the plan period. The MM is considered effective as it will ensure that the WCLP is able to meet a higher percentage of its OAN than originally proposed in the Publication Draft. It is considered that the proposed MM meets the tests of soundness as set out in the Framework (para 182).</p>	None	Noted.
0458/M/03/C	Cabus Parish Council	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		N	<p>We are disappointed that Wyre Borough Council has amended the Settlement Boundary to the West of Cockerham Road to accommodate an increase to the site allocation area of SA1/16 (from 5.81 to 14.52 Hectares) and site capacity (from 100 to 260 dwellings). We feel there is a justified argument to be made NOT to include MM/065 and MM/103 on the following basis: 1. that the latest (2016) Household Projections suggest a 12.5% reduction compared with the 2014-based projections – the proposed site capacity increase from 100 to 260 is excessive and unnecessary 2. that it is highly unlikely that the delivery of a new Primary School would ever materialise on SA1/16, even if the suggested justification for increasing the site area is to accommodate such a facility 3. "The larger site is being promoted by a national housebuilder". Clearly the Planning Inspectorate has access to information which we, as consultees, don't - but the wishes (or promotional activities) of national housebuilders should not be dictating our site allocations for Local Planning purposes</p>	Amend Settlement Boundary (SP1), Strategic Area of Separation (SP1), Countryside Are (SP4 and Mixed Use Development (SA3)	The modification to site SA1/16 has been made in accord with the Inspector's Initial Advice, para. 32 (EL6.003b). The Inspector having consider all submitted written and oral evidence has concluded that it was appropriate to extend the boundaries of site SA1/16 to accommodate additional development to meet identified needs. Household projections do not translate to housing requirements but form the starting point in calculating housing need. As explained in the Council's letter to the Inspector (EL6.004b) an annualised reduction of 33 households compared to the 2014 household projections do not represent a meaningful change. The Council is committed to an immediate partial review of the Local Plan which will consider need based on the Government's standard methodology and applying the relevant household projections. It is not clear why it is thought that the primary school will not be delivered. The Policy allows for the on or off-site provision of additional education provision as appropriate. The site was promoted by Taylor Wimpy through publicly available submission to the Publication Draft Local Plan and by attendance at the examination hearings.
0766/M/02/C	AR & A Chippendale Farming Partnership	MM/103	Policies Map SA1/16 West of Cockerham Road, Garstang		Y	<p>We support a new primary school at this proposed site. A number of local schools have issues regarding access and parking, and new developments will lead to overcrowding of existing schools. A new school is the best solution to facilitate these problems and helps to supply the demand for new school places in the area. Therefore in order to deliver a primary school, we agree with the inspectors recommendation to extend the boundaries of site allocation SA1/16 to the west of Cockerham Road, Garstang.</p>	None	Noted.
0222/M/02/C	Ric Dumbleton	n/a	n/a		Y	No comment.	n/a	Noted.

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Table 6 - Summary of Representations on the Sustainability Appraisal Addendum (D)				
Unique Ref	Name	SA Ref	SA - Summary of Representation	Response
0290/M/08/D	Fylde Council	n/a	The Sustainability Appraisal makes 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. Therefore, it does not satisfy our earlier request for a sustainability appraisal which allows a thorough assessment of the alternatives with respect to this issue and in compliance with the Environmental Assessment Regulations.	The Sustainability Appraisal Addendum (EL7.002) identifies that the differences in housing numbers between the preferred OAN 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 OAN and a review of transport and highway issues. This subsequent review will be supported by a SA.
0473/M/03/D	Mr P Barnett	Section 1 Section 2	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. Consider that 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. With regard to social impacts the SA only discusses the potential for development supporting local services and "accessibility" to services and the economic impacts are only discussed within the context of the vibrancy and vitality of rural settlements. This falls short of a proper assessment of the likely impacts arising from the reasonable alternatives. The SA does not provide a sound basis for assessing the likely effects arising from such scenarios or justification for not meeting the OAHN of 479 dwellings.	The Sustainability Appraisal Addendum (EL7.002) identifies that the differences in housing numbers between the preferred OAN 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 OAN and a review of transport and highway issues. This subsequent review will be supported by a SA.
0654/M/03/D	James Procter	n/a	In relation to SA1/13 - No demand for housing in Inskip village - recent new houses not selling. No bus service in the evenings. More housing would mean another 200 plus cars on narrow local roads. Greater hazard (with possible fracking traffic) for walkers, cyclists and house riders. New houses will be built close to existing houses with no buffer zones of trees and greenery to soften the impact on the countryside and avoid existing properties being overlooked. Village will change from a farming into a commuter community. Wildlife value to the land.	This representation is not directly in relation to the content of the SA report Addendum.  Matters regarding the sustainability of Inskip have already been considered by the Inspector as part of the Local Plan hearing and examination process.
0659/M/03/D	Mike Ainsworth, Inskip-with-Sowerby Parish Council	n/a	No comments raised.	Noted
0671/M/02/D	Glyn Stead, Little Eccleston with Larbreck Parish Council	Land West of Great Eccleston (Page 77)	With regard to items 2. Education; 3. Health; 4. Housing; 5. Access; and 6. Economy; which are currently represented as being GREEN should all in fact be reflected as being RED, for the following reasons: 2. Education - The primary school does not have the capacity to accept children from another 568 new homes. 3. Health - The GP surgery is already at 'capacity', with waiting times of up to a month. 4. Housing - The provision of another 568 new homes will only be detrimental in respect of the limited school provision, inadequate GP surgery provision and will provide an additional burden to the road network and to essential services (gas, water, electricity, telephony). 5. Access - There is not a railway station / rail link and bus service provision has already been greatly reduced. 6. Economy - there are not employment opportunities in the area which will sustain adult owners of another 568 new homes and, inevitably, this will result in even more adults travelling out of the area to work, causing further road congestion, greater damage to the road networks and to the environment.	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. It is a high level document that has followed a logical approach to assessment, assessing the sites against the site assessment criteria set out in appendix E of the main SA report. The SA scores are correct for the sites access to existing facilities. It should also be noted that the site under 'other information' scores ++ for employment as the site provides 1 hectare of employment land.  An Infrastructure Delivery Plan (IDP) has been produced which sets out what level of new or improved infrastructure will be required to deliver the growth proposed in the Wyre Local Plan. The IDP supporting the Local Plan has been informed by detailed consultation with a range of stakeholders and service providers.  The Local Plan is assessed against the SA objectives that include objectives dealing with access (objective 5), education (objective 2), health and wellbeing (objective 3), air quality (objective 13), sustainable economic growth (objective 6) and biodiversity (objective 8). The SA acknowledges that greenfield sites will be lost as a consequence of development and this may have impact on local biodiversity/habitat. The SA recommends that mitigation is proposed. The Local Plan is balancing a number of competing social, economic and environmental matters which includes allocating land for development and protecting the countryside. Policy CDMP4 in the Local Plan deals with Environmental Assets and the protection, enhancement and management of functional networks.  The SA acknowledges that development may place further pressure of educational facilities and recommends further facilities are included in the development to mitigate potential negative effects.  The Infrastructure Delivery Plan (IDP) supporting the Local Plan sets out what level of new or improved infrastructure will be required to deliver the growth proposed in the Local Plan, this has included the provision of new schools/school places.  The SA acknowledges that development may increase the use of private car which has the potential to increase local emissions to air. The SA recommends that increased sustainable transport provisions could offset these emissions. It is noted that the local plan, though policies SA1, SA3 and SA4 allocates land sufficient for 5,397 houses of which 5,049 are expected to be delivered within the Plan period. Of these almost 80% are located in locations with good direct access to public transport along the A6 and on the peninsula. The reasonable alternative development options considered are set out in the Site Allocations background paper and assessed within the SA (appendix G).

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Table 6 - Summary of Representations on the Sustainability Appraisal Addendum (D)

Unique Ref	Name	SA Ref	SA - Summary of Representation	Response
0794b/M/010/D	Wainhomes	Section 2	<p>It should be made clear that the 464dpa figure falls short of the full OAN and would result in the needs of 295 households not being met over the plan period.</p> <p>Section 2 discusses two reasonable alternatives to the 464dpa figure i.e. the OAN in full of 479dpa and 457dpa. The Environmental, Social and Economic impacts are discussed and it is concluded that the differences between the three scenarios are 'very small'. We consider that the failure to meet the needs of these households would result in significantly adverse impacts in terms of the social and economic roles of sustainable development. The failure to meet the needs of 295 households would have significantly adverse social consequences for those identified households, and it would exacerbate adverse market signals across the Borough as supply falls short of meeting identified needs e.g. affordability ratio and house prices. It would result in significantly fewer affordable units over the plan-period (89 affordable units based upon 30% provision), and this should be seen within the context of the Borough's identified affordable housing needs (i.e. between 134 and 189 dpa as per the SHMA) and would have adverse social consequences. It would have adverse consequences for economic impacts e.g. construction jobs impacts upon the supply chain as a result of less household expenditure on local services. Section 2 of the Sustainability Appraisal Addendum does not make any reference to the advantages or disadvantages of addressing the shortfall of 295 dwellings over the plan-period. With regard to social impacts, the document only discusses the potential for development supporting local services and 'accessibility' to services and the economic impacts are only discussed within the context of the vibrancy and vitality of rural settlements. This falls short of a proper assessment of the likely impacts arising from the reasonable alternatives. It is not considered that the Sustainability Appraisal Addendum provides a sound basis for assessing the likely effects arising from such scenarios.</p>	<p>The Sustainability Appraisal Addendum (EL7.002) identifies that the differences in housing numbers between the preferred OAN 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.</p> <p>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. This subsequent review will be supported by a SA.</p>
0845/M/01/D	Elizabeth Knowles, Natural England	Section 4	The supporting text at the beginning of Section 4 regarding site allocation SA1/13 Inskip should show a decrease (-100 houses) in housing numbers.	This is a typographical error in the introduction text only in section 4 that does not impact upon the SA conclusion.
0845/M/02/D	Elizabeth Knowles, Natural England	Section 4	The Revised Site Assessment tables in Section 4, in particular for site allocations SA1/8 South of Blackpool Road and SA1/9 South Stalmine, under SA Objective Topic 8 (Biodiversity), both recommend that appropriate ecological surveys are undertaken and where possible, lost habitats are recreated or enhanced. However, the policy wording for both these allocations (in the Adopted Local Plan) does not reflect this and the references to ecological mitigation is proposed to be removed. Can the LPA look at this and ensure that the recommendations in the SA are carried through into the Local Plan policy wording.	<p>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.</p> <p>The Council is satisfied that all recommendations in the SA are carried forward within the Local Plan.</p>
0987/M/06/D	Elaine Deegan	n/a	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-fits-all approach. The SA should be updated for rural areas.	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, and by its very nature, rural site allocations are likely to have a lower score.
1055/M/02/D	Emily Hrycan, Historic England	n/a	At this stage we have no comments to make on its content.	Noted



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Table 7 Summary of General Comments (GC)								
ID	Unique Ref	Name	Organisation	Agent	LP Ref	Summary of Representation	Suggested Mods	Response
0385	0385/M/01/GC	Rachel Crompton	Lancashire County Council - Local Lead	n/a	n/a	We have no comments to make.	None	Noted
0545	0545/M/02/GC	Edwina Parry	Garstang Town Council	n/a	Spatial Portrait and Vision	<p>Para 2.4.4. SHMA notes there is a shortage of smaller properties but developers advertising 3/4/ and 5 bedroom houses. There should be a requirement to have regard to SHMA.</p> <p>Para 2.9.2 An identified challenge is accommodating growth and change with high quality design which responds positively to local character and new development that is integrated with its surroundings and creates a sense of place and protects local distinctiveness and heritage.</p> <p>The opportunity to explain practical measures has not been taken.</p> <p>Section 3. The vision is one of balancing sustainable growth and environmental considerations.</p> <p>Para 3.2.13. Outside the Peninsula, rural areas continue to thrive and retain their character. "Garstang is a vibrant Market Town servicing surrounding rural areas. Growth in some areas has been accommodated in sensitive ways."</p>	Vision Modifications might have included examples of what "character" and "sensitive" growth would look like.	Comments are general in nature and do not relate to a specific Main Modification.
0545	0545/M/14/GC	Edwina Parry	Garstang Town Council	n/a	Economy section	Garstang is the only Key Service Centre and Main Town in the Rural Area. There are 4 Rural Service Centres and the A6 is their lifeline to Garstang for service provision (i.e. library, shops, school etc.) The distance between the Wyre boundary at Forton in the North and the boundary in the South at Barton is just over 10 miles and it is inevitable that the majority of families moving to new homes will rely on Garstang. This brings both opportunities and problems of access and capacity which the policy does not fully address.		Comments are general in nature and do not relate to a specific Main Modification.
0676	0676/M/01/GC	Alex Hazel	Environment Agency	n/a	n/a	The Level 2 SFRA: Flood Risk Sequential Test Paper (document reference EL8.007) considers the risk of flooding to amended allocations SA1/11 Norcross and SA1/13 Inskip Extension, and we are satisfied with its content.	n/a	Noted.
0676	0676/M/02/GC	Alex Hazel	Environment Agency	n/a	n/a	We also note that amendments have been made to Key Development Considerations for the several site allocations. There are references to surface water being drained into named watercourses, which are designated Main Rivers. Where outfalls are proposed directly into Main Rivers the developer will require an Environmental Permit for Flood Risk Activities.	n/a	Noted.
0676	0676/M/03/GC	Alex Hazel	Environment Agency	n/a	n/a	Where open space buffers are to be provided alongside watercourses, the KDC text could be more robust by referring to green and blue infrastructure and how the provision and enhancement of such assets can provide multifunctional benefits.	See summary.	The Key Development Considerations refer to matters that are to be considered as part of the masterplan and/or planning application process for the site allocation. Policy CDMP4 provides the overarching policy for the provision of Green Infrastructure and water courses and bodies. Therefore additional wording in the key development consideration is considered unnecessary.
0684	0684/M/01/GC	Tim Bettany-Simmons	The Canal & River Trust	n/a	n/a	<p>No comment to make on proposed Main Modifications.</p> <p>The Trust appear to have been missed previous consultation stages on the Local Plan and the opportunity to ensure Lancaster Canal is catered for within the Plan.</p>	None	<p>Noted.</p> <p>It is also noted that the Canal and River Trust were formally consulted at the Issues &amp; Options and Publication stages.</p>
0794b	0794b/M/011/GC	n/a	Wainhomes	Emery Planning	n/a	The Council's approach to masterplanning for each site allocation would only serve to exacerbate the real risks associated with the housing trajectory and the absence of any flexibility or contingency; lead-in times for the trajectory have had no regard for the guidance recently published by the Council with respect to the masterplanning process.	Delete the requirement for site allocations to be subject to a masterplanning process.	Comments are general in nature and do not relate to a specific Main Modification.
0845	0845/M/03/GC	Elizabeth Knowles	Natural England	n/a	HRA	No objections. However, some instances of the conclusions of the appropriate assessment being no LSE (likely special effect) and should be no aeoi (adverse effect on integrity).	Update conclusions in Appropriate Assessment to correct conclusion of no aeoi.	This is a terminology error in the Appropriate Assessment conclusion that will be updated. This does not impact upon the outcome of HRA.
1055	1055/M/01/GC	Emily Hrycan	Historic England	n/a	n/a	At this stage we have no comments to make on its content.	None	Noted

WYRE LOCAL PLAN

STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018

APPENDIX 3.2

RESPONSES TO THE MAIN MODIFICATIONS

N/S = not stated

Table 8 Responses on appearance at the sitting session of the Public Examination

Personal ID	Name	Organisation	Agent	Wish to appear? Y.N.N/S	Reason
0023	Robert Cooke	n/a	n/a	N	n/a
0032	Jane Saleh	Blackpool Council	n/a	N/S	n/a
0051	Robert Fail	Wyre Labour Group of Councillors	n/a	N	n/a
0072	Howard Phillips	Thornton Action Group	n/a	N	n/a
0172	Trudie Webster	Ingle's Dawndew Salad	Katie Delaney	Y	No comment.
0222	Ric Dumbleton	n/a	n/a	N	n/a
0290	Mark Evans	Fylde council	n/a	N/S	n/a
0297	Joanne Harding	HBF	n/a	N/S	n/a
0343	Warren Hilton	Highways England	n/a	N/S	n/a
0358	Matthew Symonds	Hollins Strategic Land	n/a	Y	n/a
0363	Jessica Bond	Taylor Wimpey UK Limited	Brian O'Connor, Lichfields	Y	See representations
0385	Rachel Crompton	Lancashire County Council - Local Lead Flood Authority	n/a	N/S	n/a
0398	Alexis De Pol	De Pol Assoc.	n/a	Y	To promote a site and give evidence on delivery and survey work.
0458	Dr Louise Banton	Clerk, Cabus Parish Council	n/a	Y	n/a
0473	Mr P Barnett	n/a	Stephen Harris, Emery Planning	Y	Concerns about meeting the development requirement. Proposed site is well placed to assist in meeting that need.
0545	Edwina Parry	Garstang Town Council	n/a	Y	n/a
0616	John Hallas	Claughton on Brock Parish Council	n/a	N	n/a
0645	n/a	Nether Wyresdale Parish Council	n/a	N/S	n/a
0654	James Procter	n/a	n/a	N	n/a
0659	Mike Ainsworth	Inskip-with-Sowerby Parish Council	n/a	Y	The Parish Council feel duty bound to represent local opinion through the public examination process.
0671	Glyn Stead	Little Eccleston with Larbreck Parish Council	n/a	N	n/a
0676	Alex Hazel	Environment Agency	n/a	N/S	n/a
0684	Tim Bettany-Simmons	The Canal & River Trust	n/a	N/S	n/a
0766	Andrew, Robert & Amanda Chippendale	AR & A Chippendale Farming Partnership	n/a	N	n/a
0774	Bruce Ramsden	n/a	n/a	N	n/a
0785	John Carr	n/a	GA Associates	N/S	n/a
0794a	n/a	Wainhomes	Chris Betteridge	Y	To promote the allocation and respond to issue regarding delivery, timings etc.
0794b	n/a	Wainhomes	Emery Planning	Y	To critically examine the council's position.
0808	n/a	Story Homes	Dan Mitchell, Barton Willmore LLP	Y	n/a
0845	Elizabeth Knowles	Natural England	n/a	N/S	n/a
0902	n/a	Pipecroft Ltd	Harry Tongue, Steven Abbott Associates	N	n/a
0930	Robin Buckley	Redrow Homes Ltd	Graham Trehella, Cass Associates Ltd	N	n/a

STATEMENT OF CONSULTATION ADDENDUM NOVEMBER 2018					
APPENDIX 3.2					
RESPONSES TO THE MAIN MODIFICATIONS					
Table 8 Responses on appearance at the sitting session of the Public Examination					
Person al ID	Name	Organisation	Agent	Wish to appear? Y,N,N/S	Reason
0937	n/a	Bourne Leisure Ltd	Nathan Matta, Lichfields	N	n/a
0941	John Fleming	Gladman Developments Ltd	n/a	N/S	n/a
0944	n/a	Applethwaite Ltd	Graham Love, Smith and	Y	To explain and discuss our representation with the Inspector
0947	J and R Parkinson	n/a	Graham Love, Smith and	Y	To explain and discuss the representation and request for an amended modification with the Inspector
0953	n/a	Telereal Trillium	Graham Love, Smith & Love	Y	To clarify any of the points raised in this representation if necessary.
0962	n/a	Metacre	Alexis De Pol, De Pol Associates	Y	To promote our client's allocations and provide details on delivery and the status of survey work
0963	Paul Smith	Strategic Land Group	n/a	Y	To explain the physical characteristics and the reasons why the modification is not sound.
0987	Elaine Deegan	n/a	John Knight	Y	To present continuing concerns about the approach of the council to the allocation at Inskip.
0995	Paul Desborough	IRAG	n/a	N	n/a
1015	Philip James	n/a	n/a	Y	Development at Inskip is disproportionate and not sustainable. It should be halted.
1055	Emily Hrycan	Historic England	n/a	N/S	n/a
1058	Barbara Sumner	n/a	n/a	N	n/a
1059	Jane Readman	n/a	n/a	Y	To be listened to as letters can be ignored, as can emails.
1060	n/a	Carrick Sports Ltd	Rob Moore, Savills (UK) Ltd	Y	To discuss housing land supply; OAHN; housing delivery; and how Land at Calder House Lane can deliver of OAHN