



Wyre Council
Submission Draft Wyre Local Plan
Partial Review (2011-2031)
Statement of Consultation
April 2022

Contents

1. Introduction – page 3
2. Developing the Wyre Local Plan - page 3
3. Statement of Community Involvement - page 4
4. Ward, Parish and Town Council Member Involvement – page 5
5. Local Plan Preparation (Regulation 18) - page 7
6. Publication Draft Public Consultation – page 9
7. Duty to Co-operate and Joint Working – page 22
8. Further Information – page 24

Appendices

Appendix 1 - Town and Country Planning (Local Planning) (England) 2012 Regulations (SI No.767) (Extract) – page 25

Appendix 2 – Statement of Community Involvement Consultation, April 2021 – page 28

Appendix 3 – Regulation 18 (Scoping) Consultation Letter – page 31

Appendix 4 – Regulation 18 (Scoping) Schedule of Consultees (Organisations) – page 33

Appendix 5 – Newsletter, September 2021 – page 37

Appendix 6 – Newsletter, November 2021 – page 38

Appendix 7 – Publication Draft Newsletter, November 2021 – page 40

Appendix 8 - Regulation 19 (Publication) Schedule of Consultees (Organisations) – page 42

Appendix 9 - Statement of Representations Procedure and Availability of Documents, November 2021 (Publication) – page 47

Appendix 10 – Mobile Library Notice (Publication) – page 49

Appendix 11 – Public Notice (Publication) – page 51

Appendix 12 – Social Media and Wyre Council News (Publication) – page 54

Annex 1 - Regulation 18 (Scoping) Consultation Responses (separate document)

Annex 2 - Regulation 19 (Publication) Consultation Responses (separate document)

1. Introduction

- 1.1 It is a legal requirement of the Town and Country Planning (Local Planning) (England) 2012 Regulations (SI No.767) (Appendix 1) that a Statement of Consultation accompanies the submission of a local plan to the Secretary of State. Regulation 22 of the regulations requires the Statement to demonstrate:
- Who was consulted during the local plan preparation stages (known as the Regulation 18 stage/s);
 - How those who were consulted were invited to make representations;
 - What main issues were raised by the consultees; and
 - How the representations were taken into account in local plan preparation.
- 1.2 Regulation 22 also requires the Statement of Consultation to state the number of representations made in response to the Publication version of the local plan (Regulation 19/20 stage) and to provide a summary of the main issues raised.
- 1.3 This version of the Statement of Consultation has been produced to support the Submission edition of the Wyre Local Plan Partial Review (2011-2031). In line with the Regulations outlined above, it details the nature and outcomes of the consultation carried out at the plan preparation stage (Regulation 18) and Publication stage (Regulation 19).
- 1.4 Although Regulation 18 requires consultation at the plan preparation stage, there is nothing in the regulations themselves that prescribe the form such preparations should take. For the partial review this stage of the plan preparation process was represented by the publication of a scoping letter in February 2020.
- 1.5 To provide the necessary context, the next section of this Statement details the background to the partial review.

2. Developing the Wyre Local Plan

- 2.1 The Wyre Local Plan (2011-2031) was adopted on 28 February 2019 following a period of public examination.
- 2.2 The Plan is a single document consisting of a written statement and policies map. It includes sections on the following:
- Spatial portrait and key issues;
 - Vision and objectives;
 - Local plan strategy and strategic policies;

- Core development management policies
 - Housing policies
 - Economy policies;
 - Land allocations and designations; and
 - Monitoring
- 2.3 The Local Plan covers a 20-year period from 2011 to 2031. It forms the main component of the development plan for Wyre that also includes the Joint Lancashire Minerals and Waste Development Framework, consisting of the Core Strategy (2009), Site Allocations and Development Management Policies (2013), and the Policies Map.
- 2.4 The Wyre Local Plan 2011-2031 was developed with, and informed by, a Sustainability Appraisal, Habitat Regulation Assessment and a series of subject based evidence base documents. In conjunction with the Local Plan, the council worked with its partners to publish an Infrastructure Delivery Plan. As the Local Plan emerged the evidence base and available supporting documents were made available for public comment.
- 2.5 Policy LPR1 – Wyre Local Plan Review requires the early partial review of the Wyre Local Plan with the objective of meeting the full objectively assessed housing needs over the plan period and, in this context, to update the assessment of objectively assessed housing need, review transport and highway issues and review the allocation of sites for residential development to meet the assessed housing need. This draft Statement of Consultation supports the partial review of the adopted Local Plan and will be updated before submission of the Local Plan Partial Review to reflect consultation and engagement at the Publication (regulation 19) stage.
- 2.6 It is of note that the adopted Local Plan was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). There has been several revisions to the NPPF since then, the latest being in 2021. As described below, the Partial Review will have regard to conformity with national planning guidance.

3. Statement of Community Involvement (SCI)

- 3.1 The Wyre Statement of Community Involvement (SCI) sets out how the council will engage with local people and organisations in the planning process through the preparation of planning policy documents such as the Local Plan and during the consideration of planning applications. The SCI is a public statement and sets the minimum standards the council aim to achieve in this process. The SCI was refreshed in April 2021 and subject to a four-week public consultation between 29th April and Friday 28th May 2021 (Appendix 2).

- 3.2 The council received eight responses of which three made no comment on the document. Of the remaining five responses, the majority of comments related to the consideration of planning applications and enforcement. There were three comments relating to the Local Plan; one from the Defence Infrastructure Organisation seeking acknowledgement of statutory safeguarding plans around Warton Aerodrome (itself located within the boundary of Fylde council) and the need to consult the MOD on development where applicable; one from the Canal and Rivers Trust seeking specific recognition of their status as a general consultation body; and one from the Thornton Action Group concerned that the production by the council of a Housing Implementation Strategy would be under the auspices of the 2012 National Planning Policy Framework rather than the (then) more recent 2019 edition of the NPPF.
- 3.3 As a result of the consultation, minor amendments were made in relation to enforcement and development management. There were no amendments relating to development plan production.
- 3.4 The SCI was adopted by the council in August 2021. It will be maintained as a living document whereby it may be appropriate for the council to make necessary revisions to the document to reflect changes in legislation and regulations that may occur from time to time. Where the revisions may alter the principles and engagement techniques, the council may consider it appropriate to undertake further proportionate public consultation on the proposed revisions. The SCI can be accessed from <https://www.wyre.gov.uk/planning-policy/statement-community-involvement-sci/1>

4. Ward, Parish and Town Council Member Involvement

Wyre Ward Councillors

- 4.1 Wyre council contains 24 wards served by a total of 50 ward councillors. Of these, seven, including the Leader of the Council, sit on the council's Cabinet. As well as the formal reporting of local plan matters to Cabinet and Full Council, including briefings for the relevant portfolio holder, engagement with members has taken place through the Planning Policy Working Group (PPWG), an advisory body (the Group is not a formal Committee or Sub-Committee of the Council) comprising of between 10 and 16 Councillors, including:
- Representatives from each geographic area of the Borough (i.e. Fleetwood, Thornton-Cleveleys, Poulton-le-Fylde, Rural East and Rural West);
 - Two members of the Planning Committee.

- The relevant Portfolio Holder.
 - Two opposition Members.
- 4.2 The PPWG is chaired by a senior Member (currently the Vice-Chair of Planning Committee) and meets on an as-needed basis.
- 4.3 In addition to on-going engagement with PPWG on local plan matters, on 28 October 2021 a briefing was given by the Planning Policy Manager to all council Members. This provided an opportunity to describe the background to the partial review and the proposed revisions to the Local Plan. The event provided an opportunity for the Members to ask questions about the process of the partial review and the proposed way forward. The briefing was held in-person at Wyre Civic Centre.

Wyre Parish and Town Councillors

- 4.4 The borough of Wyre contains 18 parish councils and three town councils. The only parts of the borough without parish or town council administration are Cleveleys, Thornton and Poulton-le-Fylde.
- 4.5 In 2010 a system of Planning Ambassadors was created to provide a link between the council's planning function (development management, planning policy and regeneration) and the parish/town councils. Under the Planning Ambassador system, each parish/town council is invited to nominate a parish or town councillor as their Planning Ambassador. The role of the Planning Ambassador is to:
- Act as a conduit between the council and parish/town council, acting as an initial contact point for matters where a parish or town council input is required into a planning matter;
 - Provide a means by which information can be shared with the full parish/town council; and
 - Provide a route through which matters can be raised by the parish/town council with the planning department.
- 4.6 As well as normal consultation at the formal stages of the plan preparation process, at 6.30pm on 8 November 2021 the council held a briefing with representatives from the parish and town council's. Each parish and town council were invited to send a representative from their area (see the Statement of Common Ground and Statement of Compliance). The invite included a draft copy of the evidence document "Implementing LPR1". Representatives from six parish and town council's attended the briefing (there were two last minute cancellations). The briefing was given by the Planning Policy Manager and provided an opportunity to describe the background to the review and the proposed revisions to the Local Plan. The

event provided an opportunity for the parish and town council's to ask questions about the process of the partial review and the proposed way forward. The briefing was held in-person at Wyre Civic Centre.

5. Local Plan Preparation (Regulation 18)

- 5.1 To inform the preparation of the partial review the council launched a scoping consultation in February 2020. The consultation period was for just over six weeks from 28 February 2020 to 5.00 pm on 14 April 2020. As the name suggests, the purpose of the consultation was to invite comments on the scope of the partial review. The scoping consultation was promoted by a letter (Appendix 3) sent by e-mail and post to 476 contacts (organisations and private individuals) whose details are held on the planning policy consultation database. Organisations included those referred to in the regulations as specific consultation bodies (for a list of organisations including private companies see Appendix 4). The letter established the rationale for the partial review with reference to Policy LPR1 and the National Planning Policy Framework. The letter also stated that revisions to allocations will not fall within the scope of the partial review.
- 5.2 The letter was “deposited” for viewing at the public reception at the Wyre Council Civic Centre in Poulton-le-Fylde and the boroughs six local libraries (Cleveleys, Fleetwood, Garstang, Knott End, Poulton-le-Fylde and Thornton).
- 5.3 Officers ensured that materials were appropriately located and remained available during the consultation period.
- 5.4 Respondents were able to submit representations as follows:
- Electronically via e-mail direct to the planning policy team at Wyre council; and
 - By post (or hand) to the planning policy team at the Civic Centre.
- 5.5 During the consultation period the Government introduced measures to deal with the outbreak of COVID-19 from 20 March 2020. The council is not aware of any respondent or consultee being unable to respond to the consultation due to these measures and it is not considered to have had an impact on the findings of the consultation. The council received one query relating to the impact of the COVID-19 on the consultation process but no requests for an extension to the deadline was received. No responses were received after the deadline.
- 5.6 The Scoping consultation elicited fifteen responses, all from organisations. The council's response, a summary of the points raised by each respondent and a copy of each submission is set out in Annex 1 to this Statement of

Consultation. All responses received have been read in full and been fully taken into account in setting the scope of the partial review. Key issues raised through the consultation were:

Allocations:

- Stating that reviewing allocations is outside of the scope of the review pre-determines the outcome of the assessment of local housing need, which could indicate a need to increase allocations.
- Support for no changes to allocations.
- The review must provide flexibility in the supply.
- Deliverability of housing should be reviewed in light of the ongoing response to COVID-19 and requirement for masterplans.

Housing need:

- The calculation of housing need should take into account the government's revised methodology and the publication of the ONS 2016 based Household Projections. These supersede the 2014-based projections that were a key input into Wyre council's determination of the objectively assessed housing needs.
- Standard method should be used as a starting point for reviewing the local housing requirement figure with consideration given to economic matters, affordable housing and institutional accommodation.
- It should be recognised that the standard method produces a minimum figure. The review must not result in lower jobs growth, reduced provision against the scale of affordable housing needs or suppressed younger household formations.
- The adoption of a local housing need figure should not be used as a mechanism to suppress the adopted housing requirement figure.
- There is a clear link between worsening affordability and low levels of housing. Unless Wyre commit to delivering a higher level of housing, its affordability issues are likely to remain or even worsen.

Highways:

- The scope of the highways element will need to include sufficient, robust and up-to-date capacity modelling.
- A wider transport impacts and needs study is required as part of the evidence base for the Local Plan review.

Scope:

The scope of the review should be widened to include:

- The suitability of Policy EP4 (Town, District, Local and Neighbourhood Centres)
- The creation of a new Supplementary Planning Document (SPD) for the Garstang town centre or a specific allocation to support economic recovery.
- A consideration of how infrastructure funding could be better targeted to support Garstang town centre.
- A review of Policy SP4 (Countryside Areas), specifically the hierarchy imposed under criterion 4. Holiday and residential accommodation should be more positively treated.

5.7 A summary of the representations made and the council's response was published in May 2020. This is available from <https://www.wyre.gov.uk/planning-policy/local-plan-partial-review-2011-2031-1/2>

5.8 In its detailed response to representations, the council clarified that a consideration of allocations (further allocations, de-allocations or no allocations) is within the scope of the partial review and will be undertaken in accordance with Policy LPR1. The council's response also confirmed:

- That the scope of the partial review is set by Policy LPR1;
- The intention to update Wyre's Objectively Assessed Need for housing in accordance with the government's standard method methodology;
- That the partial review will consider matters of conformity with the NPPF19; and
- That issues raised in relation to policies outside of the scope of LPR1 are not to be considered as part of the partial review.

5.9 The council maintains a local plan consultation database which is used to notify interested organisations and individuals of local plan consultation and planning policy matters through a planning policy newsletter (see examples at Appendix 5, 6 and 7). The newsletter can be subscribed to at <https://www.wyre.gov.uk/local-plan/local-plan-2011-2031/3>

6. Publication Draft Public Consultation

Consultation

6.1 The Publication Draft Wyre Local Plan Partial Review (2011-2031) was published on 30 November 2021 for a seven week public consultation ending 5pm 18 January 2022. The council issued a newsletter on the 29 November to the council's local plan consultation database (Appendix 7). This reached 531 recipients (of which 11 were by letter) (Appendix 8). This included the specific consultation bodies, Wyre parish and town councils and general

consultation bodies, as well as those private individuals held on the local plan database. The newsletter included the Statement of Representations Procedure and Availability of Documents (Appendix 9). In addition, the newsletter was sent to each Wyre council ward member.

6.2 The public consultation involved a suite of evidence-base and supporting documents as listed below:

- Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031)
- Sustainability Appraisal
- Habitat Regulation Assessment Screening Report
- Equalities and Health Impact Assessment
- Viability Study Addendum
- Implementation of Policy LPR1 Background Paper
- Housing Implementation Strategy (HIS) Partial Review (November 2021)
- Draft Statement of Common Ground and Duty to Cooperate Statement of Compliance
- Draft Statement of Consultation
- A covering letter that includes a schedule of deposit documents provided at the library for the consultation and WBC contact details
- Regulation 19 – Consultation Letter (including Statement of Representation Procedure)
- Guidance Note for Representations
- Copy of the Public Notice
- Wyre Local Plan (2011-2031)
- Statement of Community Involvement (SCI)
- Local Development Scheme (LDS)

6.3 The council placed “on-deposit” for public viewing the above documents in the following locations:

Wyre Council, Civic Centre Reception, Breck Road, Poulton-le-Fylde, FY6
Cleveleys Library, Rossall Road, Thornton-Cleveleys, FY5 1EE
Fleetwood Library, North Albert Street, Fleetwood, FY7 6AJ
Garstang Tourist Information Centre, 1, Cherestanc Square, Rope Walk,
Knott End Library, 26 Lancaster Rd, Knott End on-Sea, FY6 0AU
Poulton-le-Fylde Library, Blackpool Old Road, Poulton-le-Fylde, FY6 7DH
Thornton Library, Victoria Road East, Thornton-Cleveleys, FY5 3SZ

6.4 It is noted that Garstang Library was closed for the period of the consultation and as such the council arranged for the documents to be deposited in the nearby Garstang Tourist Information Centre. A consequence of the temporary closure of Garstang Library was that the mobile library was unable to

accommodate the deposit material. As an alternative the mobile library hosted a notice detailing where the material could be viewed (Appendix 10).

6.5 All of the deposit material was available on the Wyre council web site at <https://www.wyre.gov.uk/planning-policy/local-plan-partial-review-2011-2031-1/3>

6.6 The council also published a public notice in three local newspapers on 1 December 2021 (Appendix 11). The papers were:

- Garstang Courier
- Blackpool Gazette
- Fleetwood Weekly News

6.7 Finally, the council published details of the public consultation on social media channels (Appendix 12).

Consultation Response

6.8 At the Publication Stage representations are invited on specific matters, namely:

1. Whether or not the Plan is legally compliant;
2. Whether or not the Plan meets the requirements of the Duty to Cooperate; and
3. Whether or not the Plan is “sound”, that is:
 - Positively prepared - This means that the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - Justified - The Local Plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.
 - Effective - The Local Plan should be deliverable over its period and based on effective joint working on cross- boundary strategic priorities.
 - Consistent with national policy - The Local Plan should enable the delivery of sustainable development consistent with the National Planning Policy Framework.

The council also sought representations on the Sustainability Appraisal.

- 6.9 A total of 23 individuals and organisations made submissions within the consultation deadline. There was one additional late response and this was accepted, giving a total of 24 submissions. The council has reviewed these submissions and determined that they constitute 118 separate representations, the vast majority of which were either directly concerned with soundness of related matters.

Main Matters

Legal compliance

- 6.10 There were two representations that referred to the test of legal compliance. In both cases the legal test was considered to have been passed. There were no representations that argued that the Partial Review fails the test of legal compliance.

Duty to Co-operate

- 6.11 One representation – from Fylde Council - addresses the issue of the duty to co-operate (reference 0022/P/013/B2). The representation acknowledged the continuing co-operation with Wyre council and Fylde council do not argue that Wyre council has failed in its duties in relation to the duty to co-operate. However, Fylde Council do ask that the duty to co-operate Statement of Common Ground be updated to reflect the current local plan position in Fylde and in particular seeks clarity on Wyre's housing requirement position and assurance that Fylde Council are no longer required to meet unmet housing need arising in Wyre.

Soundness

- 6.12 Overall, there were 35 responses that directly referenced the test of soundness – of these 33 were comments that the Partial Review is unsound and two comments considered that the Partial Review is sound, one of which was from the Environment Agency.
- 6.13 The Partial Review is particularly focused on matters relating to the housing requirement and related matters (as established by Policy LPR1 of the adopted Local Plan). It is no surprise, then, that matters relating to the housing requirement and the adoption of the standard method of calculating housing need feature strongly.
- 6.14 The following provides a summary of the matters raised in relation to the soundness of the Local Plan Partial Review. Please note that this does not cover every issue raised – please see the council's detailed summary of each representation (Annex 2) for further details.

- 6.15 In some cases both comments on soundness and general comments (see below) referred to matters and policies that are not subject to proposed change. These are included in the summary below.

Housing requirement

- 6.16 The proposal to amend the housing requirement to 296 dwellings per annum for the period 2019 to 2031 based on use of standard method for the period was considered by a number of respondents to be unsound. Comments included:
- The standard method establishes a minimum position that should be regarded as a starting point for defining the appropriate level of local housing need, not the end point.
 - The Inspector's requirement for an early partial review was to ensure the Plan met the full objectively assessed need (OAN) for housing. The Partial Review should not be used as a mechanism to suppress the adopted housing requirement figure.
 - Partial review should be meeting OAN. Additional sites should be allocated as required by LPR1 criterion 3.
 - Housing need is likely to be higher than the housing requirement currently identified.
 - The council should look at a variety of factors and consider whether there are exceptional circumstances when calculating housing need. Cannot just simply use the standard method when calculating the housing need.
 - The circumstances which point to a need for the housing requirement to be higher than the minimum suggested by the standard method should be investigated.
 - There is no justification in the NPPF or PPG for an early plan review based on the adopted housing requirement being higher than the requirement generated by the standard method. Reducing the housing requirement from 460 to 296 is not supported in the NPPF or PPG. Partial review not entitled to review the housing requirement in policy HP1
 - Although a lower housing requirement is proposed there has been no assessment of strategy against national planning policy and guidance and no review of the implications of following such a change in approach.
 - The council has failed to deliver a significant boost to the housing supply required by the national planning policy. The approach does not support the government's levelling-up agenda.
 - The NPPG allows for situations where previous levels of housing delivery in an area or previous recently produced SHMA are significantly greater than the outcome from the standard method. Authorities will need to take this in to account when considering whether it is appropriate to plan for a higher level of need than the standard method.

- The proposed housing requirement is a significant decrease from current adopted Local Plan requirement of 460dpa and below the 433dpa delivered on average over 2016/17-2020/21. The housing requirement should be increased to better reflect this evidence.
- Should not use delivery since 2011 which has been influenced by lack of up to date local plan in a green belt authority, suppressing housing delivery. Average of 349 dwellings built per annum since 2011 is not a representative figure.
- 349 is significantly greater than 296 as it is a 17% increase and implies a higher housing requirement.
- A Partial review within two years of adoption has not provided a true delivery rate based on housing need in the adopted local plan. Should take account of the housing trajectory for sites with consent or committed.
- Since 2015/16, at least 320 homes have been delivered annually in the borough, demonstrating a higher-level of house building is achievable and that there is market demand. Sales and market demand remain at peak levels in Wyre. Reducing annual housing need to 296 dpa when more than this can and must be delivered will exacerbate the housing crisis.
- Additional housing allocations need to be identified to support a higher housing requirement or at least the housing requirement set in the adopted Local Plan.
- Until 296 dpa is adopted through the Partial Review, the figure of 460 must be used for the calculation of the five-year supply, and if there is a shortfall, then unallocated sites must be considered.
- The Local Plan is not currently delivering market and affordable housing needs. Reducing growth will exasperate this problem. Council should review housing strategy and make new allocations.
- Expect council to fully support existing allocations including SA1/14 and encourage them to be brought forward within Plan period.
- A review of existing allocations has found that 608 homes on allocated sites do not appear to be coming forward for residential development or have constraints which cannot be overcome.
- Identified affordable housing need would be a significant proportion of housing requirement. The housing requirement should be increased to allow for market and affordable housing need to be met.
- The affordability adjustment within the standard method calculation for Wyre is insufficient to meet current undersupply and should be increased.
- Reducing the housing requirement to 296 dpa for remaining plan period will lead to reduction in the delivery of affordable homes, contrary to spatial strategy. An affordable housing update is required to understand the local circumstances as to whether the affordability ratio is appropriate.

- Delivery of affordable housing is a key priority for the council. The council is under-delivering against the adopted Local Plan targets. Over plan period, delivered 688 units against need of 1,615.
- Numbers on the housing register, worsening affordability indicators and past affordable housing shortfall, leads to strong case for affordable housing delivery.
- The adopted housing requirement is based on an economic growth scenario. In line with the National Planning Policy Framework at §81 the council should consider whether the standard method outcome would support economic growth.
- Wyre Local Plan Inspector's report at §58-60, emphasised minimum OAN of 457 dpa was considered reasonable not to constrain job growth and reflect market signals. 479 dpa provides flexibility and takes account of forecasting uncertainties and avoid marked fall in the Borough's working age population.
- Consideration has not been given to employment requirements in context of reduced housing requirement. Employment trends and needs have not been taken into consideration.
- Reducing the housing requirement will likely encourage inward community into borough for work opportunities and no longer provide sustainable development.
- The reduction in housing requirement will lead to an imbalance between economic and residential development and does not support strategies such as the Enterprise Zone at Hillhouse. The housing requirement should be increased to allow for an appropriate balance to be struck
- Delivering less homes will lower number of economically active people in the Borough to fill anticipated job growth and exasperate increased job vacancy rates following COVID-19.

LPR1 background paper

- The LPR1 background paper does not provide any new baseline evidence, including an Objectively Assessed Need figure, on housing need. National planning practice states that "housing need is an unconstrained assessment of the number of homes needed in an area". Therefore, the assessment of need should be completely unconstrained and not limited to standard method.
- A full and updated OAN should be prepared. The Partial Review should have updated the Strategic Housing Market Assessment or prepared a new Local Housing Needs Assessment.
- Do not agree that housing delivery since 2011 is not significantly greater than the standard method (LPR1 background paper §3.3). On delivery rates, a higher figure is justified.

- LPR1 background paper has not considered the wider housing context, including need for affordable housing and for first time buyers.
- A number of allocations have no permission and there is no information on delivery of completions for each site. This provides incomplete picture. A number of consents are beyond the standard 3 year time period and there is no information on completions on each site. The housing trajectory could be overestimating likely delivery.

Employment

- The employment land requirement has not been amended to reflect lower housing growth.
- 43 hectares of employment land is too high given the reduction in the housing requirement. The Council should seek to save countryside from development where possible.

Highways and Transport

- Expect council to meet full OAN to be found sound, it will be necessary to consider transport and highway issues to include highway capacity analysis. This would allow understanding of any additional capacity since Local plans adoption and ensure sufficient infrastructure.
- With reference to the Inspector's report §68-73 & 78 that further local and strategic highway network work required to meet full OAN, the partial review has the objective of meeting the OAN within the Plan period. The purpose of partial review is not to prepare an alternative lower housing requirement which is not an OAN i.e. standard method proposed by this Partial Review.

Other

- No exceptional circumstances for the release of land from the green belt. Wyre is planning for too many houses and jobs. There are alternative sites including 49.82 hectares of brownfield land on the brownfield register. The Green Belt designated land is not required for development during the local plan period.

General Comments

- 6.17 The council received 71 general comments that did not specifically reference soundness. Some of these related to the matter of the housing requirement, and many of these echo comments listed above. Comments on housing requirement and supply and other matters include:

- Accept LPR1 background paper §3.2 regarding no circumstances justifying uplift in local housing need figure regarding housing deals, strategic infrastructure improvements or neighbouring planning authority unmet housing need.
- Average housing completions since 2011 is 349dpa, largely due to low completions in the early years. Last five monitoring years, the average completions is 478dpa and higher than adopted Local Plan requirement of 460dpa and significantly more than standard method.
- Disappointed that the adopted local plan housing requirement remains by virtue of the allocations.
- Insufficient site allocations to meet Wyre's emerging housing requirement.
- Additional land at Forton should be allocated for residential development.
- The Council states that only two of its allocations do not have planning permissions in place. However, some allocations have large portions that do not have permissions in place. This does not provide sufficient reasoning to warrant such a significant reduction in the housing requirement. The allocations may not deliver as intended, even those with planning permission. Indeed, they have been slow to deliver to date.
- Restrictive phasing would help promote urban regeneration in advance of countryside loss. The local plan does not promote sustainable development. Brownfield land should be allocated.
- Unclear how Fylde's incorporation of Wyre unmet need of 380 dwellings in Fylde's own partial review is taken into account in Wyre Partial Review and whether or not the 380 dwellings is accounted for in the headroom between Wyre's 9,423 dwellings supply figure and the 7,232 dwellings total requirement (Fylde Council).
- As Wyre has lowered their number by using the standard method, they no longer require Fylde to assist them in meeting their unmet need. This should be acknowledged in the Plan. The implementation of the Wyre Partial Review is a more sustainable option than continuing with the development strategy in the currently adopted Wyre Local Plan 2011-2031 (Fylde Council).
- In policy HP1 the housing requirement of 7,232 is made up from 8 years at 460 and 12 years at 296. Consideration should be given as to whether the most sustainable policy would be to add 152 dwellings to meet the shortfall in 2011-19, rather than for these to be provided for outside the Borough. This would add 13 dpa from 2019-31 i.e. 309 dpa overall requirement (Fylde Council).
- The full need for the period 2011-2019 at paragraph 9.2.1 has not been met by the Wyre Partial Review (Fylde Council).
- Existing local plan requirement too high resulting in a failure of the housing delivery test and development in rural areas and on greenfield land.

- Need a clearer explanation of the relationship between the Objectively Assessed Housing Need and the housing requirement as in the current adopted Wyre Local Plan these mean different things (Fylde Council).
- ‘Supports use of the standard method and a reduced housing requirement to 296 dwellings per annum (dpa), however it is recommended that the Council should reduce further the number of houses focused on rural Wyre and affordability assumptions flawed.
- For the standard method, the Government mandate use of ONS 2014 data which shows higher population growth rate compared to ONS 2016, 2018 and 2020 all show slower growth rates. Leads to higher housing growth rates, job and housing targets. This promotes development of greenfield land including Green Belt in advance of brownfield.
- There should be a greater priority given to brownfield development in Wyre.
- The windfall amount could be higher at 75 dwellings per annum. There is 49.82 hectares of brownfield land recorded on the register. At a development density of 40 dwellings per hectare this equates to 1,992 houses.
- Support the doubling of Wyre's windfall allowance from 2024 as the evidence shows that this is justified (Fylde Council).
- Query why Wyre needs a land supply buffer (paragraph 7.2.6 of the adopted plan proposed to be paragraph 7.2.5) as over performing on completions.
- First Homes’ are not ‘genuinely’ affordable homes in perpetuity, as 80% of market value is still out of reach of most people.
- Policy HP3 in relation to First Homes would benefit from further information within the justification text as to how this will be applied in practice.
- Reducing the boroughs carbon footprint will be impossible, firstly due to the scale of development and increase in traffic volume, and secondly because of the large volume of peat that will need to be removed on some sites.
- Building on greenfield sites will not lead to a net gain in biodiversity.
- Developments that do not support climate and biodiversity goals should be refused. Mitigation and compensation must be adequate and enforceable.
- The local plan could better reflect the move towards 10% Biodiversity Net Gain (Environment Agency).
- The local plan should plan for needs and protect and conserve Wyre’s important natural assets. There is a declared climate emergency, and the area is liable to flooding.
- Climate change should be included within the scope of the Partial Review (Claughton-on-Brock Parish Council).

- Paragraph 5.1.1 should reference the fact that Wyre Council declared a 'Climate emergency' on 11 July 2019.
- Planning Policy should require installation of communal ground source heating systems as part of new developments of three or more houses (Cloughton-on-Brock Parish Council).
- The partial review provides information on the new housing figure, however it does not provide details of the specific planning areas. Detail is required of how the 5,192 dwellings will be allocated on the sites SA1, SA3 and SA4 (Lancashire County Council).
- It is noted that the scope of the partial review has narrowed to exclude some of the changes introduced by the NPPG19.
- Objects to the deletion of 'The Duty to Cooperate' from the contents page because it is a key aspect of local plan making, especially in rural areas where environmental sensitivity and constraints can lead to urban neighbours delivering part of any unmet need
- Disappointed by the Council's view that there should be no review of the highway and transport evidence. Further and dramatic measures need to be considered to disperse and regulate traffic along the A6.
- It is welcomed that there are no alterations proposed to the land in Fleetwood (which currently comprises school playing fields) and that the Local Plan continues to show this land as green infrastructure (Sport England).
- The NHS, council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. Should ensure NHS continues to receive a commensurate share of S106 contributions.
- Policy SP4 text is poorly worded and in order not to promote inappropriate unsustainable development it should be amended. Duplicates NPPF paragraph 80 (d) and therefore query the necessity of this change.
- The plan should not allow building in areas of flood risk.
- The evidence base informing the Independent Economic Review for Lancashire and accompanying Environment Commission work should form part of the underpinning evidence for amending the figures (Lancashire County Council).
- Proposed amendments to HP3 that refers to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. Policy would benefit from further information within the justification text as to how this will be applied in practice.
- Add Policy LPR1 into Appendix A and indicate it is deleted (Fylde Council).

Evidence Base

6.18 The council has produced a background paper “Implementation of Policy LPR1” to support the partial review process and proposed revisions to the adopted Local Plan. A number of comments on soundness referenced the Background Paper and these are summarised above. In addition, Fylde Council has commented:

- That the base date of the standard method (2021) which they deem to be inconsistent with their own partial review and creates a position whereby the housing requirement for the period 2019-21 is not based on a calculation of housing need for that period.
- The document does not address how the identified shortfall in housing need that generated the need for Wyre Partial Review will be addressed. The background paper should acknowledge that Fylde Council has made provision for 380 dwellings in its Partial Review to meet the unmet need in Wyre Local Plan 2011-2031 but should consider whether the shortfall could and should be met instead within Wyre borough, given the headroom supply.
- Paragraph 8.3 does not accurately portray the circumstances by which the Fylde Local Plan Partial Review was conducted and concluded in advance of the Wyre Partial Review.

6.19 The council has produced a Housing Implementation Strategy (HIS) Partial Review. Fylde Council has commented that future updates of this document should reference the fact that Fylde’s own partial review accommodates Wyre’s unmet housing need of 380 dwellings.

Technical Documents

6.20 The Schedule of Revisions to the Wyre Local Plan Partial Review (2011-2031) is supported by a suite of technical documents that provide analysis of the review context and impact. Comments made against each of these documents are detailed below.

Sustainability Appraisal

6.21 There were five comments relating to the Sustainability Appraisal. Comments included:

- Satisfied that the SA has been updated to take account of our previous comments, which includes referencing measurable Biodiversity Net Gain (BNG) (Environment Agency).
- Concur with the conclusions of the Sustainability Appraisal Report (Natural England).

- The Sustainability Appraisal does not make any assessment of the reduction of the housing number as a reasonable alternative and the relative sustainability of lowering the housing number. It will be more sustainable to meet Wyre's housing needs in Wyre, and it is considered that this should have been assessed in the sustainability appraisal (Fylde Council).
- It is normally expected that the SA would mention the Lancashire Historic Environment Record (HER) being a source for information on both designated and non-designated heritage assets (Lancashire County Council).

Habitats Regulations Assessment

6.22 There was one response to the HRA:

- Concur with the conclusions of the HRA (Natural England).

Financial Viability Assessment Review

6.23 There was one response to the FVA which regarded the document as containing fundamental flaws, including:

- That the FVA does not take into account new mandatory national policy requirements relating to energy efficiency and Biodiversity Net Gain;
- That a comprehensive refresh of the LVA that supported the Adopted Wyre Local Plan that addresses methodological concerns (summarised below) should take place given the time elapsed since and economic impact of the pandemic.
- The FVA to support the Partial Review is based on a high-level indexation approach utilising approximate change in build costs and values which is unreliable and is not sufficiently evidenced, including:
 - No up-to-date review of recent s106 agreements to assess whether current s106 regime remains appropriate.
 - Insufficient evidence for site typologies, housing mix and unit size assumptions as used for the 2017 FVA to support the now adopted Wyre Local Plan.
 - Over-reliance on Land Registry data which is unreliable due to COVID-19 impacts on sample sizes.
 - Affordable housing transfer values insufficiently evidenced.
 - Use of BCIS build cost data does not take into account recent inflation.
 - Concerned that the 2017 build cost data was disclosed as part of the 2017 FVA and as such it is unclear that the costs were representative.
 - Abnormal cost assumptions for greenfield sites are not realistic.

- Lack of supporting evidence for benchmark land values.

Equality and Health Impact Assessment

6.24 No comments on the EqHIA were submitted.

7. Duty to Co-operate and Joint Working

Duty to Co-operate (DtC)

7.1 Section 110 of the Localism Act 2011 inserted s33A into Part 2 of the Planning and Compulsory Purchase Act 2004 that introduced a duty on local planning authorities, county councils and other bodies with statutory functions to cooperate with each other on strategic planning matters. Accordingly, the council has worked closely with neighbouring local planning authorities, the county council and key stakeholders when preparing the evidence base and developing the Publication Draft Wyre Local Plan Partial Review (2011-2031) – Wyre Local Plan Schedule of Revisions (2011-2031). The council has prepared a separate statement on compliance with the Duty to Co-operate, including a Statement of Common Ground as required by the National Planning Policy Framework 2021.

Evidence Base – Engagement

7.2 The partial review is, by definition, limited in scope and hence the evidence base necessary to support the review is not as extensive as if a full review were underway. The table below lists key evidence and supporting documents currently informing the partial review. In some cases, documents are at the drafting stage.

Evidence	Key Parties Involved	Comment
Implementation of Policy LPR1 (evidence paper)	Draft circulated to neighbouring authorities, National Highways and Lancashire County Council, including the Highway Authority	Strong agreement on the approach of Wyre council to the partial review.
Implementation of Policy LPR1 (evidence paper)	In September 2021, the council contacted specific stakeholder bodies through a bespoke newsletter seeking views on the emerging evidence paper “Implementation of Policy LPR1”. Appendix 5	Responses were received from the Environment Agency, Historic England and Natural England (see Statement of Compliance).

Evidence	Key Parties Involved	Comment
	contains a copy of the newsletter text.	
Implementation of Policy LPR1 (evidence paper)	In November 2021, the council circulated an updated draft of the evidence paper "Implementation of Policy LPR1" to parish and town councils. .	The council held an in-person presentation of the emerging evidence base to parish and town council representatives held on 8 November 2021 (see above).
Implementation of Policy LPR1 (evidence paper)	In November 2021, the council circulated an updated draft of the evidence paper "Implementation of Policy LPR1" to adjoining parish councils for information and written comment if they so wished.	No responses received at the time of writing.
Housing Implementation Strategy	Developers, landowners and agents	To gain a full understanding of local housing dynamics across the borough and how this, along with any other factors, is impacting either positively or negatively on the housing market, the council carried out a survey of developers, landowners and agents. A total of 76 survey pro-formas were sent relating to 56 individual sites. The council received 45 responses (59%) relating to 35 sites (63%). This information fed directly into the conclusions reached in this HIS.
Habitat Regulation Assessment	Natural England	On-going consultation on Screening Report and emerging partial review. NE confirmed at Publication stage acceptance of the conclusions of the HRA Screening Report.
Sustainability Appraisal (SA)	Natural England Heritage England Environment Agency	Consulted on the SA Scoping Report, April 2021. On-going consultation on the emerging partial review. NE and the EA confirmed at Publication stage acceptance of the conclusions of the SA. There was no response from Heritage England.

8. Further Information

Information about the partial review including publicity and consultation material is available from the council's web site at <https://www.wyre.gov.uk/planning-policy> or by contacting the Planning Policy Team at Wyre Council, Civic Centre, Breck Road, Poulton-le-Fylde, FY6 7PU. (e-mail: planning.policy@wyre.gov.uk).

Appendix 1 - The Town and Country Planning (Local Planning) (England) Regulations 2012 (extract)

Preparation of a local plan

18.—(1) A local planning authority must—

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must—

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

Representations relating to a local plan

20.—(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

Submission of documents and information to the Secretary of State

22.—(1) The documents prescribed for the purposes of section 20(3) of the Act are—

(a) the sustainability appraisal report;

(b) a submission policies map if the adoption of the local plan would result in changes to the adopted policies map;

(c) a statement setting out—

(i) which bodies and persons the local planning authority invited to make representations under regulation 18,

(ii) how those bodies and persons were invited to make representations under regulation 18,

(iii) a summary of the main issues raised by the representations made pursuant to regulation 18,

(iv) how any representations made pursuant to regulation 18 have been taken into account;

(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and

(vi) if no representations were made in regulation 20, that no such representations were

made;

(d) copies of any representations made in accordance with regulation 20; and

(e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

(2) Notwithstanding regulation 3(1), each of the documents referred to in paragraph (1) must be sent in paper form and a copy sent electronically.

(3) As soon as reasonably practicable after a local planning authority submit a local plan to the Secretary of State they must—

(a) make available in accordance with regulation 35—

23. Before the person appointed to carry out the independent examination under section 20 of the Act makes a recommendation under section 20(7), (7A) or (7C)(1) of the Act the person must consider any representations made in accordance with regulation 20.

(i) a copy of the local plan;

(ii) a copy of each of the documents referred to in paragraph (1)(a), (b) and (c);

(iii) any of the documents referred to in paragraph (1)(d) or (e) which it is practicable to so make available, and

(iv) a statement of the fact that the documents referred to in sub-paragraphs (i) to (iii) are available for inspection and of the places and times at which they can be inspected;

(b) send to each of the general consultation bodies and each of the specific consultation bodies which were invited to make representations under regulation 18(1), notification that the documents referred to in paragraphs (a)(i) to (iii) are available for inspection and of the places and times at which they can be inspected; and

(c) give notice to those persons who requested to be notified of the submission of the local plan to the Secretary of State that it has been so submitted.

Appendix 2 – Statement of Community Involvement Consultation, April 2021

- 1. Newsletter (extract)**
- 2. Web Page**

Planning Policy Newsletter

April 2021 Edition.

Dear Consultee,

Statement of Community Involvement (SCI) Public Consultation

The council is required to prepare and update a Statement of Community Involvement (SCI). The SCI sets out how the council will engage with local people and organisations in the planning process through the preparation of planning policy documents such as the Local Plan and during the consideration of planning applications. The SCI is a public statement and sets the minimum standards we aim to achieve in this process.

The current SCI was adopted by the council in 2010. To reflect changes to planning legislation and best practice, a revised draft SCI has been prepared and will be subject to a **4 week public consultation between 29th April and 5pm on Friday 28th May 2021.**

The [revised draft SCI is available to view online](#).

Consultation comments on the revised draft SCI can be submitted to the council via:

Email: planning.policy@wyre.gov.uk

In writing: Planning Policy, Wyre Council, Civic Centre, Breck Road, Poulton-le-Fylde, FY6 7PU

Consultation comments received during the consultation will be considered by the council, and where relevant, will be used to update and finalise the SCI before it is adopted by the council. Consultation comments received after 5pm on 28th May 2021 will not be considered.

Statement of Community Involvement (SCI)

The Statement of Community Involvement (SCI) sets out how the council will engage with local people and organisations in the planning process through the preparation of planning policy documents such as the Local Plan and during the consideration planning applications. The SCI is a public statement and sets the minimum standards we aim to achieve in this process.

The current SCI was adopted by the Council on 21st January 2010.

To reflect changes to planning legislation and best practice, a revised draft SCI has been prepared and will be subject to a 4 week public consultation between **29th April and 5pm on Friday 28th May 2021**.

Consultation comments on the revised draft SCI can be submitted to the council via:

- Email: planning.policy@wyre.gov.uk
- In writing: Planning Policy, Wyre Council, Civic Centre, Breck Road, Poulton-le-Fylde, FY6 7PU

Consultation comments received during the consultation will be considered by the council, and where relevant, will be used to update and finalise the SCI before it is adopted by the council.

Consultation comments received after 5pm on 28th May 2021 will not be considered.

For further information on this document, please contact the council via email: planning.policy@wyre.gov.uk or call: 01253 891000

Appendix 3 – Regulation 18 (Scoping) Consultation Letter

28 February 2020

Dear Sir/Madam,

Public Consultation. Regulation 18.

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

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

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

1) The Wyre Local Plan to 2031 was adopted on 28 February 2019. It was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). A revised NPPF was published in February 2019, Annex 1: Implementation, Paragraph 212 states that Plans may need to be revised to reflect policy changes which the replacement framework has made. This should be progressed as quickly as possible, either through a partial review or by preparing a new plan. Wyre Council is proposing to carry out a partial review.

2) The Wyre Local Plan to 2031 includes Policy LPR1 – Wyre Local Plan Review which requires the early partial review of the Wyre Local Plan with the objective of meeting the full objectively assessed housing needs over the plan period. The Policy sets out the matters to be included in the partial review including an update of objectively assessed needs and review of transport and highway issues.

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

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

Comments should be made in writing either by email to planning.policy@wyre.gov.uk or by post to Planning Policy, Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU, to be received by the deadline of 5.00 pm on 14 April 2020. **All comments will be published but apart from the name of the sender no other personal information will be publicly available. Anonymous comments will not be accepted.**

You are receiving this letter because your contact details are held of our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters

and/or the contact details are incorrect, please let us know either by phone 01253 891000 or email planning.policy@wyre.gov.uk .

Yours faithfully,

Steve Smith

Planning Policy Manager.

Appendix 4 - Regulation 18 (Scoping) Schedule of Consultees (Organisations)

Associated British Ports
Avison Young
Barnacre with Bonds Parish Council Planning Ambassador
Barnacre with Bonds Parish Council
Barratt Homes
Barrow Borough Council
Barton Grange
Barton Parish Council
Barton Willmore
Baxter Group Limited
Bell Ingram
Bellway Homes Ltd
Bilsborrow Post Office
Blackpool Council
Blackpool Transport
Bleasdale Parish Council
Bowland Forest (Higher) Parish Council
Breck Primary School
Broadgrove Planning and Development Ltd
BT
Burlingham Park Ltd
Cabus Parish Council
Cadent Gas Limited
Cardinal Allen Catholic High School
Carleton St. Hilda's Church of England Primary School
Carr Head Primary School
Cass Associates Ltd
Central Lancashire Friends of the Earth
Chipping Parish Council
CLA
Claughton-on-Brock Parish Council
Cockerham Parish Council
Countryside Properties
De Pol Associates
DfE
EE
Electricity NW
Ellel Parish Council
Elswick Parish Council
Emery Planning
Environment Agency
Fleetwood Civic Society
Fleetwood Town Council
Forest of Bowland Area of Outstanding Natural Beauty Partnership
Forton Parish Council
Forton Women's Institute
Fox Planning Consultancy

Frank Harrington Associates
Frost Planning Ltd
Fylde Council
Garstang ramblers
Garstang Town Council
Graham Anthony Associates
Great Eccleston & District Agricultural Society
Great Eccleston Parish Council
Greater Preston CCG
Hambleton Parish Council
Head of Enterprise Zones (Blackpool Council)
Health and Safety Executive
Highways England (as was)
Historic England
Hollins Strategic Land
Holliss Vincent
Home Builders Federation (HBF)
Homes England
Ingle's Dawndew Salad Ltd
Inskip-with-Sowerby Parish Council
Jennifer Lampert Associates Ltd
JWPC Ltd
Kirkland Parish Council
Lancashire County Council Planning Group
Lancashire Association of Parish & Town Councils Wyre Area Committee
Lancashire Constabulary
Lancashire County Council
Lancashire County Council Highways
Lancashire County Council, Public Health
Lancashire Enterprise Partnership Ltd
Lancashire Fire & Rescue Service
Lancashire Mind
Lancashire North CCG
Lancashire Wildlife Trust
Lancaster City Council
Lead Local Flood Authority
Lichfields
Little Eccleston with Larbreck Parish Council
M.O.D.
Marine Management Organisation
Marrons Planning
Maybern Planning and Development
Member of Parliament for Blackpool North and Cleveleys
Member of Parliament for Wyre and Preston North
Morris Homes
Mosaic Town Planning
My Neighbourhood Plan
Myerscough and Bilsborrow Parish Council
Myerscough College
N Vision Blackpool, Fylde and Wyre Society for the Blind

Nateby Parish Council
National Grid
NATS
Natural England
Nether Wyresdale Parish Council
Nateby Parish Council
Network Rail
Nexus Planning
NFU North West
North & Western Lancashire Chamber Of Commerce
Northern Edge Limited
Northern Trust
NPL Group
Office of Rail and Road
Office of the Police and Crime Commissioner
Open Reach
Out Rawcliffe Parish Council
Over Wyresdale Parish Council
Overton Parish Council
Persimmon Homes Lancashire
Peter Brett Associates
Catterall Parish Council
Kirkland Parish Council
Pilling Parish Council
Plainview Planning
Poulton-le-Fylde Historical & Civic Society
Preesall Town Council
Preston City Council
Property Capital plc
PWA Planning
R & D Gregory
RC Church
Redrow Homes Ltd
Regenda Group
Ribble Valley Borough Council
Richard Turner & Son
Rossall School
Rowland Homes
Royal Society for the Protection of Birds (RSPB)
Savills (UK) Ltd
Scorton Residents Association
Sedgewick Associates
Shepherd Planning
Singleton Estates Ltd
Singleton Parish Council
Smith & Love Planning Consultants
Sport England
SSA Planning Limited
St Mary's Catholic Primary School Great Eccleston
St Wulstan and Edmund, Fleetwood, Lancashire

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

Appendix 5 – Newsletter, September 2021

Planning Policy Newsletter

September 2021 Edition.

Dear Consultee,

Wyre council is currently undertaking a partial review of its adopted Local Plan 2011-2031 as required by Local Plan Policy LPR1. Last year we published a consultation on the scope of the review, which focused particularly on the borough's housing need and any associated transport and highway matters. The council has published a [summary of the responses](#) received to the scoping exercise.

It is intended to consult on the outcome of the partial review in the form of proposed changes to the adopted Local Plan in November this year. However, before this takes place, the council wish to ensure that key stakeholders have an opportunity to comment on the emerging evidence that underpins the review. This evidence is in the form of a paper entitled "[Implementation of LPR1](#)", a draft of which is attached to this newsletter. Please note that this document remains work in progress and as such it should be treated as confidential. This is an informal consultation with key stakeholders and not a formal part of the review process. You will have a formal opportunity to response to the council's proposed changes to the adopted Local Plan later this year.

To inform our work we would be happy to receive your comments on this draft paper, with a deadline of 12 noon Friday 1 October. Comments should be sent to planning.policy@wyre.gov.uk. This e-mail address can also be used if you have any queries about the attached draft document and the review process.

Please note that due to current working arrangements, officer availability to take calls is limited, email contact is therefore preferred at planning.policy@wyre.gov.uk

Kind Regards,
Planning Policy and Economic Development
Wyre Council
15 September 2021

Appendix 6 – Newsletter, November 2021

Planning Policy Newsletter

November 2021 Edition.

Dear Consultee,

Statement of Community Involvement (SCI)

The Statement of Community Involvement (SCI) sets out how the council will engage with local people and organisations in the planning process through the preparation of planning policy documents such as the Local Plan and during the consideration of planning applications. The SCI is a public statement and sets the minimum standards we aim to achieve in this process.

The SCI was adopted by the council in August 2021.

Further information can be [seen here](#).

Local Development Scheme (LDS)

The LDS sets out the main local planning documents the Council will produce, including details about content and purpose and the timescales for preparation. This 2021 LDS is an updated position on the timetable and supersedes the 2020 version, setting out the timescales for the preparation of a revision to the Local Plan.

The LDS was adopted by the council in November 2021.

Further information can be [seen here](#).

Housing Implementation Strategy (HIS)

The council has produced a Housing Implementation Strategy (HIS) 2021. This HIS sets out the council's position on housing land supply in accordance with the requirements of the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) and supports the Wyre Local Plan 2011-2031 (WLP31).

This HIS has a base date of 1 April 2021, it takes account of all available information up to and including 31 March 2021.

The council's HIS demonstrates a deliverable housing land supply position of 6.4 years.

The HIS was adopted by the council in October 2021.

Further information can be [seen here](#).

Holiday Accommodation (EP9) – Advice for applicants

The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy EP9 Holiday Accommodation, which sets out under what circumstances development of holiday accommodation will be permitted.

The document provides guidance to support the reading and understanding of Policy EP9, it will assist applicants needing to satisfy the requirements of the policy. It provides information on how the council approaches the application or implementation of Policy EP9.

The EP9 advice for applicants was adopted by the council in October 2021.

Further information can be [seen here](#).

Should you require further information, please contact us via planning.policy@wyre.gov.uk

Kind Regards,
Planning Policy and Economic Development
Wyre Council
5 November 2021

Appendix 7 – Publication Draft Newsletter, November 2021

Planning Policy Newsletter

November 2021 - Publication Draft Wyre Local Plan Partial Review (2011-2031) Public Consultation November 2021

Dear Consultee,

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

The council is in the process of undertaking a partial review of the adopted Wyre Local Plan 2011-2031. The review has entered a key stage of the plan preparation process whereby the council is [inviting representations on the Publication Draft Wyre Local Plan Partial Review \(2011-2031\) - Schedule of Revisions to the Wyre Local Plan \(2011 – 2031\) \(the Schedule of Revisions\) and the accompanying Sustainability Appraisal.](#)

Representations are invited over a seven-week period from **30 November 2021 to 5.00pm 18 January 2022**. In accordance with the National Planning Policy Framework, the consultation seeks the views of the local community and stakeholders on:

- **Legal compliance** – has the council complied with all the relevant legislation and regulations, including the Duty to Cooperate, in preparing the reviewed plan?
- **Whether the reviewed plan is “sound”** – is it positively prepared, justified, effective and consistent with national planning policy?

The [Statement of Representations Procedure](#) included with this letter provides more details about the consultation. Once the council has received and considered the responses we will submit the Wyre Local Plan Partial Review (2011-2031) Schedule of Revisions and accompanying Sustainability Appraisal for public examination. Copies of the responses will be sent to the examining Planning Inspector. If you have received this letter but no longer wish to be contacted about the Local Plan please contact the Planning Policy team.

Should you require further information, please contact us
via planning.policy@wyre.gov.uk

Kind Regards,
Planning Policy and Economic Development
Wyre Council
29 November 2021

Appendix 8 - Regulation 19 (Publication) Schedule of Consultees (Organisations)

Ainscough Strategic Land
Anwyl Homes
Anwyl Homes Lancashire Ltd
Associated British Ports (ABP)
Avison Young
Barnacre - Planning Ambassador
Barnacre with Bonds Parish Council
Barratt Homes
Barrow Borough Council
Barton Grange
Barton parish council
Barton Willmore
Bell Ingram
Bellway Homes Ltd
Bilsborrow Post Office & Village Stores
Blackpool Council
Blackpool Transport
Bleasdale Parish Council
Bowland Forest (Higher) Parish Council
Breck Primary School
Broadgrove Planning and Development Ltd
BT
Burlingham Park Ltd
Cabus Parish Council
Cadent Gas
Canal & River Trust
Cardinal Allen Catholic High School
Carleton St. Hilda's Church of England Primary School
Carr Head Primary School
Cass Associates Ltd
Catterall Parish Council
Central Lancashire Friends of the Earth
Chipping Parish Council
Civil Aviation Authority
CLA
Claughton-on-Brock Parish Council
Concert Living
Cockerham Parish Council
CPRE Lancashire
Dawndew Salad
De Pol Associates
Department for Levelling Up, Housing and Communities (DLUHC)
DfE

Dickie & Moore Homes Ltd
EE
Electricity NW
Ellel Parish Council
Elswick Parish Council
Emery Planning
Environment Agency
Fleetwood Civic Society
Fleetwood Town Council
Forest of Bowland Area of Outstanding Natural Beauty Partnership
Forton Parish Council
Forton Women's Institute
Fox Planning Consultancy
Frank Harrington Associates
Frost Planning Ltd
Fylde and Wyre CCG
Fylde Council
Garstang ramblers
Garstang Town Council
Gm Ecology Unit
Goosnargh Parish Council
Graham Anthony Associates
Great Eccleston & District Agricultural Society
Great Eccleston Parish Council
Greater Preston CCG
Hambleton Parish Council
Head of Enterprise Zones (Blackpool Council)
Health and Safety Executive
Heaton Planning
National Highways
Hillhouse Enterprise Zone
Hollins Strategic Land
HollissVincent
Home Builders Federation (HBF)
Homes England
Ingle's Dawndew Salad Ltd
Inskip-with-sowerby parish council
Jennifer Lampert Associates Ltd
Jigsaw Homes Group
Jones Homes (Lancashire) Ltd
JWPC Ltd
Kirkland Parish Council
Lancashire County Council Planning Group
Lancashire Association Of Parish & Town Councils Wyre Area Committee
Lancashire Constabulary
Lancashire County Council

Lancashire County Council - Lead Local Flood Authority (LLFA)
Lancashire County Council Highways
Lancashire County Council, Public Health
Lancashire Enterprise Partnership Ltd
Lancashire Fire & Rescue Service
Lancashire LNP
Lancashire Mind
Lancashire Public Health
Lancashire Wildlife Trust
Lancaster City Council
Lichfields
Little Ecclestone with Larbreck Parish Council
M.O.D.
Marine Management Organisation
Marrons Planning
Maybern Planning and Development
Member of Parliament for Blackpool North and Cleveleys
Member of Parliament for Wyre and Preston North
Mosaic Town Planning
MPSL planning and design
My Neighbourhood Plan
Myerscough and Bilsborrow Parish Council
Myerscough College
N Vision. Blackpool, Fylde and Wyre Society for the Blind
Nateby parish council
National Grid
NATS
Natural England
Nether Wyresdale Parish Council
Nateby Parish Council
Network Rail
Nexus Planning
NFU North West
NHS England
NHS Property Services Ltd
North & Western Lancashire Chamber of Commerce
North Lancashire NHS
Northern Edge Limited
Northern Trust
NPL Group
Office of Rail and Road
Office of the Police and Crime Commissioner
Open Reach
Out Rawcliffe Parish Council
Over Wyresdale Parish Council
Overton Parish Council

Persimmon Homes Lancashire
Peter Brett Associates
Pilling Parish Council
Plainview Planning
Poulton-le-Fylde Historical & Civic Society
Preesall Town Council
Preston City Council
Property Capital plc
PWA Planning
R & D Gregory
RC Church
Redrow Homes Ltd
Residential Parks Ltd
Ribble Valley Borough Council
Richard Turner & Son
Rossall School
Rowland Homes
Royal Society for the Protection of Birds (RSPB)
Savills (UK) Ltd
Scorton Residents Association
Sedgewick Associates
Shard Developments Ltd
Shepherd Planning
Singleton Estates Ltd
Singleton Parish Council
Smith & Love Planning Consultants
Sport England
SSA Planning Limited
St Mary's Catholic Primary School Great Eccleston
St Wulstan and Edmund, Fleetwood, Lancashire
Staining Parish Council
Stalmine-with-Staynall Parish Council
Stalmine-with-Staynall Residents' Association
Steven Abbott Associates
Story Homes
Superdrott Plant Hire
Taylor Wimpey
Tetlow King Planning Ltd
The Coal Authority
The Gardens Trust
The Planning Bureau
The Strategic Land Group Ltd
Theatres Trust
Thornton Action Group
Thornton Flood Action Group
Thurnham with Glasson Parish Council

Treales Roseacre & Wharles Parish Council
United Utilities
Upper Rawcliffe with Tarnacre Parish Council
V & E J, Chadwick & Son's
W Robinson and Son (Seeds and Plants) Ltd
Wainhomes (North West) Limited
Walton & Co (Planning Lawyers) Limited
Winmarleigh Parish Council
Woodland Trust
Woodplumpton Parish Council
WYG
Wyre Labour Group
YMCA Fylde Coast

Appendix 9 - Statement of Representations Procedure and Availability of Documents, November 2021 (Publication)

Wyre Borough Council

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

Statement of Representations Procedure and Availability of Documents

Planning and Compulsory Purchase Act 2004 and Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Wyre Borough Council is publishing its Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011–2031) (the Schedule of Revisions) prior to its submission to the Government for independent examination. The adopted Local Plan is the council's principal planning document which sets the framework to guide the future development of the borough to 2031. A partial review of the Local Plan has been undertaken principally to consider the matter of housing need. The Schedule of Revisions is accompanied by a Sustainability Appraisal.

The consultation on the Schedule of Revisions and Sustainability Appraisal runs for a period of seven weeks from **30 November 2021 to 5.00pm 18 January 2022**.

The Schedule of Revisions and Sustainability Appraisal and all supporting documents can be downloaded from the council's website at

<https://www.wyre.gov.uk/planning-policy/local-plan-partial-review-2011-2031-1> A paper copy of the Schedule of Revisions, Sustainability Appraisal and supporting documents can be inspected at the following locations:

Wyre Council, Civic Centre Reception, Breck Road, Poulton-le-Fylde, FY6 7PU
Cleveleys Library, Rossall Road, Thornton-Cleveleys, FY5 1EE
Fleetwood Library, North Albert Street, Fleetwood, FY7 6AJ
Garstang Tourist Information Centre, 1, Cherestanc Square, Rope Walk, Garstang,
Knott End Library, 26 Lancaster Rd, Knott End on-Sea, FY6 0AU
Poulton-le-Fylde Library, Blackpool Old Road, Poulton-le-Fylde, FY6 7DH
Thornton Library, Victoria Road East, Thornton-Cleveleys, FY5 3SZ

Please note that due to the on-going impact of the COVID-19 pandemic opening times and terms of operation may vary or change. For up-to-date library information please contact 0300 123 6703 or access the Lancashire County Council web site at <https://www.lancashire.gov.uk/libraries-and-archives/libraries/> For Garstang TIC opening times please see <http://www.discoverwyre.co.uk/visitor-information> or call 01995 602125. For up-to-date information regarding Wyre council Reception please contact 01253 891000 or access the Wyre council web site at <https://www.wyre.gov.uk/>

Representations must be made **within** the consultation period and relate to the Schedule of Revisions and accompanying Sustainability Appraisal. A guidance note explaining how to make your representations is available from the above locations, the council's web site (see link above) and the planning policy team. Completed representations can be submitted by

e-mail to planning.policy@wyre.gov.uk

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

Representations can also be posted by hand into a ballot box held at the Civic Centre Reception.

As part of your representation you can request to be notified at an address/email address of key stages of the local plan process which will include, i. The submission of the Wyre Local Plan Partial Review (2011-2031) for independent examination; ii. Publication of the recommendations of any person appointed to carry out an independent examination of the Wyre Local Plan Partial Review (2011-2031); iii. The adoption of the Wyre Local Plan Partial Review (2011-2031). We will only be able to contact those subscribed to our local plan consultation database – please subscribe at <https://www.wyre.gov.uk/local-plan/local-plan-2011-2031/3>



PUBLICATION DRAFT WYRE
LOCAL PLAN PARTIAL REVIEW
(2011-2031)

PUBLIC CONSULTATION
30 NOVEMBER 2021
TO
18 JANUARY 2022 (5pm)

If you wish to view the proposed revisions to the Local Plan and view the supporting documents please visit -

<https://www.wyre.gov.uk/planning-policy/local-plan-partial-review-2011-2031-1>

The documents are also available to view at:

- Wyre Council Civic Centre Reception
- Cleveleys Library
- Fleetwood Library
- Garstang Tourist Information Centre
- Knott-End Library
- Poulton-le-Fylde Library
- Thornton Library

Appendix 11 – Public Notice (Publication)

Blackpool Gazette

Published 01.12.21

PLANNING NOTICES

<p>Wyre Council</p> <p>Planning and Compulsory Purchase Act 2004 The Town and Country Planning (Local Planning) (England) Regulations 2012 Notice of publication of a local plan (Regulation 19)</p> <p>Wyre council is publishing for public consultation the Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031) (the Schedule of Revisions). The Local Plan is the council's principal planning document that sets the framework to guide the future development of the borough to 2031.</p> <p>Wyre council is inviting members of the public and stakeholders to make representations on the Schedule of Revisions and accompanying Sustainability Appraisal for a seven week period from 30 November 2021 to 18 January 2022. The Schedule of Revisions, Sustainability Appraisal and supporting documents can be viewed and downloaded from the council's web site at https://www.wyre.gov.uk/local-plan/local-plan-2011-2031/</p> <p>A paper copy of the Schedule of Revisions, Sustainability Appraisal and supporting documents can be inspected at the following locations:</p> <table border="1"><thead><tr><th>Location</th></tr></thead><tbody><tr><td>Wyre Borough Council, Civic Centre Reception, Breck Road, Poulton-le-Fylde, FY6 7PU</td></tr><tr><td>Cleveleys Library, Rossall Road, Thornton-Cleveleys, FY5 1EE</td></tr><tr><td>Fleetwood Library, North Albert Street, Fleetwood, Lancashire, FY7 6AJ</td></tr><tr><td>Garstang Tourist Information Centre, Unit 1 Cherestance Square, Off Park Hill Road, Garstang, PR3 1EF</td></tr><tr><td>Knott End Library, Lancaster Road, Knott End, Lancashire, FY6 0AU</td></tr><tr><td>Poulton Library Blackpool Old Road, Poulton-le-Fylde, Lancashire, FY6 7DH</td></tr><tr><td>Thornton Library, Victoria Road East, Thornton-Cleveleys, FY5 3SZ</td></tr></tbody></table> <p>Please note that due to the on-going impact of the COVID-19 pandemic opening times and terms of operation may vary or change. For up-to-date library information please contact 0300 123 6703 or access the Lancashire County Council web site at https://www.lancashire.gov.uk/libraries-and-archives/libraries/ For Garstang TIC opening times please see http://www.discoverwyre.co.uk/visitor-information_ or call 01995 602125. For up-to-date information regarding Wyre council Reception please contact 01253 891000 or access the Wyre council web site at https://www.wyre.gov.uk/</p> <p>Representations can be submitted to the Planning Policy Team by: E-mail - planning.policy@wyre.gov.uk</p> <p>Post - Wyre Council, Civic Centre Reception, Breck Road, Poulton-le-Fylde, FY6 7PU Representations can also be posted by hand into a ballot box held at the Civic Centre Reception.</p> <p>Representations can only be made within the consultation period and must be received by 5.00pm 18 January 2022. Late representations will not be accepted.</p> <p>Representations on the Schedule of Revisions should focus on whether or not the proposed revisions are "sound" (positively prepared, justified, effective and consistent with national policy) and whether legal requirements and the Duty to Cooperate have been met.</p> <p>Queries should be addressed to the Planning Policy Team at planning.policy@wyre.gov.uk or call 01253 887321/887235.</p> <p>D Thow, Head of Planning Services Date: November 2021</p>	Location	Wyre Borough Council, Civic Centre Reception, Breck Road, Poulton-le-Fylde, FY6 7PU	Cleveleys Library, Rossall Road, Thornton-Cleveleys, FY5 1EE	Fleetwood Library, North Albert Street, Fleetwood, Lancashire, FY7 6AJ	Garstang Tourist Information Centre, Unit 1 Cherestance Square, Off Park Hill Road, Garstang, PR3 1EF	Knott End Library, Lancaster Road, Knott End, Lancashire, FY6 0AU	Poulton Library Blackpool Old Road, Poulton-le-Fylde, Lancashire, FY6 7DH	Thornton Library, Victoria Road East, Thornton-Cleveleys, FY5 3SZ
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Garstang Courier

Published 01.12.21

Wyre Council	
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The Town and Country Planning (Local Planning) (England) Regulations 2012	
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Wyre council is publishing for public consultation the Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031) (the Schedule of Revisions). The Local Plan is the council's principal planning document that sets the framework to guide the future development of the borough to 2031.	
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D Thon, Head of Planning Services	Date: November 2021

Fleetwood Weekly News

Published 01.12.21

PLANNING NOTICES

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D Thow, Head of Planning Services Date: November 2021								

Appendix 12 – Social Media and Wyre Council News (Publication)

Public notice promoting the publication version of the local plan partial review.

Wyre Council
29 November 2021 · 🌐

🔔 The council is in the process of undertaking a partial review of the adopted Wyre Local Plan 2011-2031.

The review has entered a key stage of the plan preparation process whereby the council is inviting representations on the Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031) (the Schedule of Revisions) and the accompanying Sustainability Appraisal.

Representations are invited over a seven-week period from 30 November 2021 to 5.00pm 18 January 2022

Find out more 🖱️ <https://bit.ly/3xN9og9>

WYRE.GOV.UK
Local plan partial review (2011-2031) – Wyre Council
Local Plan Partial Review (2011-2031)

5 shares

👍 Like 💬 Comment ➦ Share

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Review of the Local Plan

The council is in the process of undertaking a partial review of the adopted Wyre Local Plan 2011-2031.

The review has entered a key stage of the plan preparation process whereby the council is inviting representations on the Publication Draft Wyre Local Plan Partial Review (2011-2031) - Schedule of Revisions to the Wyre Local Plan (2011 – 2031) (the Schedule of Revisions) and the accompanying Sustainability Appraisal.

Representations are invited over a seven-week period from 30 November 2021 to 5.00pm 18 January 2022

[Visit our website to find out more.](#) 

Published: 29th November 2021



Statement of Consultation

Annex 1- Regulation 18 (Scoping) Consultation Responses

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

April 2022



Wyre Council

Partial Review of the Wyre Local Plan 2011-2031

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

May 2020

1. Introduction

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

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

2. Purpose of Partial Review

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

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

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

3. Consultation

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

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

Responses were invited either by email (PLANNING@WYRE.GOV.UK) or by post to Planning Policy, Civic Centre, Breck Rd FY6 7PU. It was made clear to all respondents that all comments will be published, and apart from the name of the sender no other personal information will be publicly available. Any anonymous comments would not be accepted.

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

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

4. Scope of the Partial Review – Next Steps

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

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

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

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

5. Appendix Items

Appendix A – Table of Consultation Responses, Wyre Council, April 2020
Appendix B - Consultation Letter (Reg. 18), Wyre Council, February 2020
Appendix C – Consultee 1 (Duchy Homes)
Appendix D – Consultee 2 (National Grid)
Appendix E – Consultee 3 (Barnacre-with-Bonds Parish Council)
Appendix F – Consultee 4 (Blackpool Council)
Appendix G – Consultee 5 (Emery Planning)
Appendix H – Consultee 6 (Fylde Borough Council)
Appendix I – Consultee 7 (Garstang Town Council)
Appendix J – Consultee 8 (Graham Anthony Associates)
Appendix K – Consultee 9 (Highways England)
Appendix L – Consultee 10 (Hollins Strategic Land)
Appendix M – Consultee 11 (Homes England)
Appendix N – Consultee 12 (Inskip-with-Sowerby Parish Council)
Appendix O – Consultee 13 (Taylor Wimpey UK Limited)
Appendix P – Consultee 14 (Marine Management Organisation)
Appendix Q – Consultee 15 (Natural England)
Appendix R – Duty to Co-operate Letter to Fylde Borough Council, Wyre Council, 6 March 2020
Appendix S – Duty to Co-operate Response from Fylde Borough Council, Fylde Borough Council, 24 March 2020
Appendix T – Schedule of Consultees

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

DRAFT

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

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

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

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

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

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

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

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

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

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

DRAFT

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

Date: 28 February 2020

Dear Sir/Madam,

Public Consultation. Regulation 18.

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

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

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

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

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

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

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

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

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

Yours faithfully,

A large, dense, black scribble used to redact the signature of the Planning Policy Manager.A smaller, dense, black scribble used to redact the name of the Planning Policy Manager.

Planning Policy Manager.

Appendix C – Consultee 1 (Duchy Homes)

DRAFT

~~CONFIDENTIAL~~

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

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

Good morning,

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

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

Kind regards,

~~CONFIDENTIAL~~

~~CONFIDENTIAL~~

Planner
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Avison Young
Planning, Development and Regeneration
Norfolk House, 7 Norfolk Street
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[Legal Disclaimer](#)

These are the notes referred to on the following official copy

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

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

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

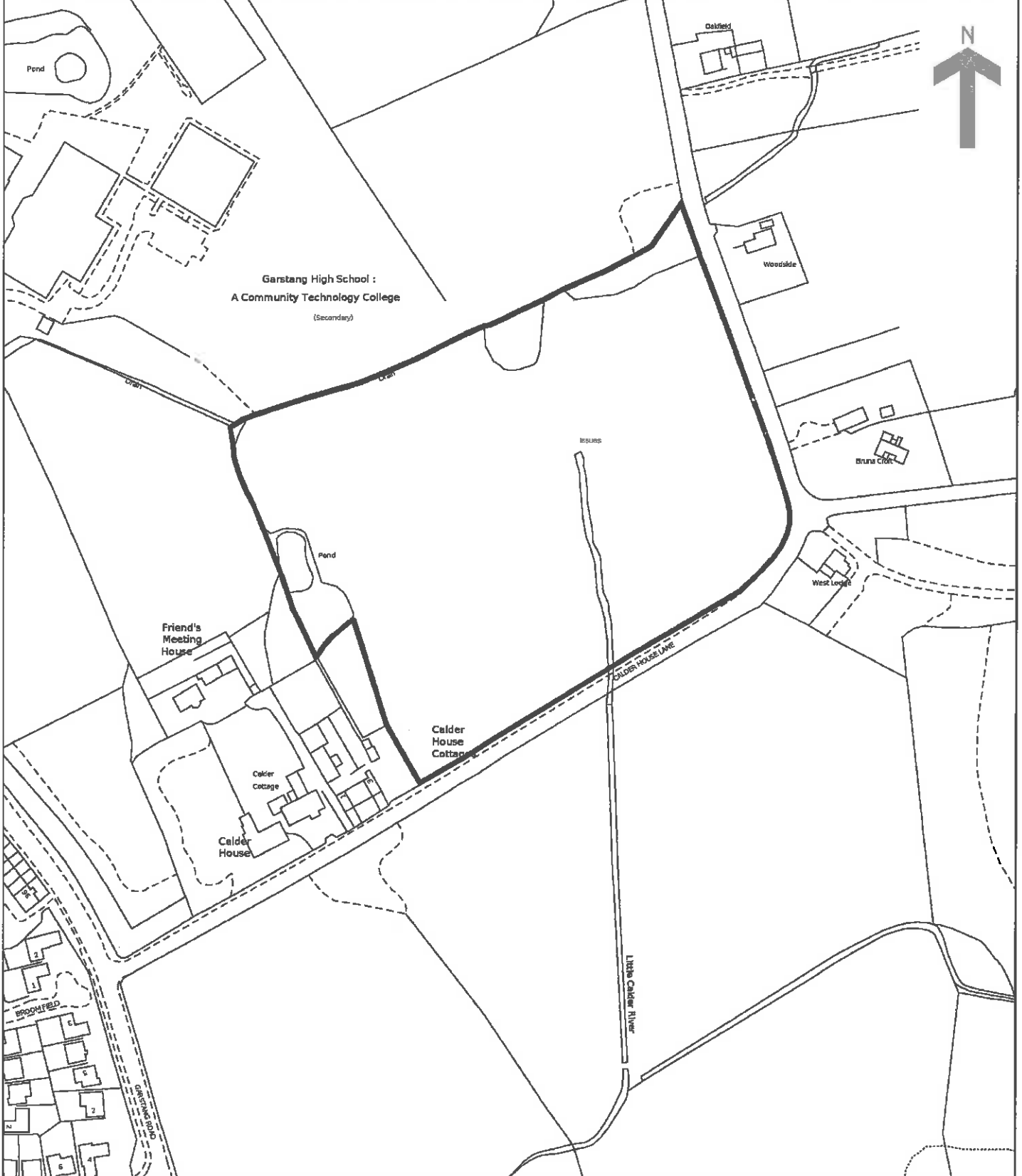
This official copy is issued on 13 March 2020 shows the state of this title plan on 13 March 2020 at 12:06:29. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be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

HM Land Registry
Official copy of
title plan

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



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14 April 2020

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

Sent by email only: Planning.policy@wyre.gov.uk

Dear Sir/Madam

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

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

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

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

Requirement for a Partial Review

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

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

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

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

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

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

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

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

OAN and Housing Delivery Test

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

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

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

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

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

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

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

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

Deliverability of Key Site Allocations

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

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

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

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

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

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

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

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

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

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

Land at Calder House Lane

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

Site Description

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

A Suitable Site

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

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

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

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

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

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

Table 1: SHLAA Extract

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

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

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

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

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

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



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

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

An Available Site

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

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

An Achievable Site

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

Summary

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

Conclusions

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

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

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

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

Yours sincerely



Senior Planner

0161 956 4075

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For and on behalf of Avison Young (UK) Limited

Land at Calder House Lane, Bowgreave

Representations to Proposed Main Modifications
to the Wyre Local Plan

Contents

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

Appendix 1 – Site Location Plan

Appendix 2 – Illustrative Masterplan

Appendix 3 – Pre-application advice

Appendix 4 – Savills Local Plan Delivery Assessment

1. Introduction

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

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

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

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

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

2. Background and Site Deliverability

Site

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

Sustainability

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

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

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

Background – Deliverability and Developability

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

³ NPPF 2018, Annex2: Glossary

⁴ NPPF 2018, Annex2: Glossary

3. Proposed Main Modifications Commentary

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

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

The Correct Objectively Assessed Housing Need

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

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

⁶ Document EL7.001a Proposed Main Modifications Paragraph 4.1.11

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

⁸ Submission Document ED010 page 21 updated January 2018.

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

3.9 Our recommendation is therefore as follows:

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

Housing supply

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

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

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

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

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

¹⁰ Table 16 submission Document ED010 updated January 2018

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

Site Allocations without planning permission – delivery assumptions

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

Windfall Allowance

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

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

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

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

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

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

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

MM/089-90 – Local Plan Review 1

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

Revisions to the OAHN in light of the Standardised Methodology

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

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

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

¹² Conservation Party Conference 1st October 2018

4. Summary

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

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

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

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

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

Appendix 1



KEY



Site Location

Land at Calder House Lane, Bowgreave

on behalf of Garstang Golf Club

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



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

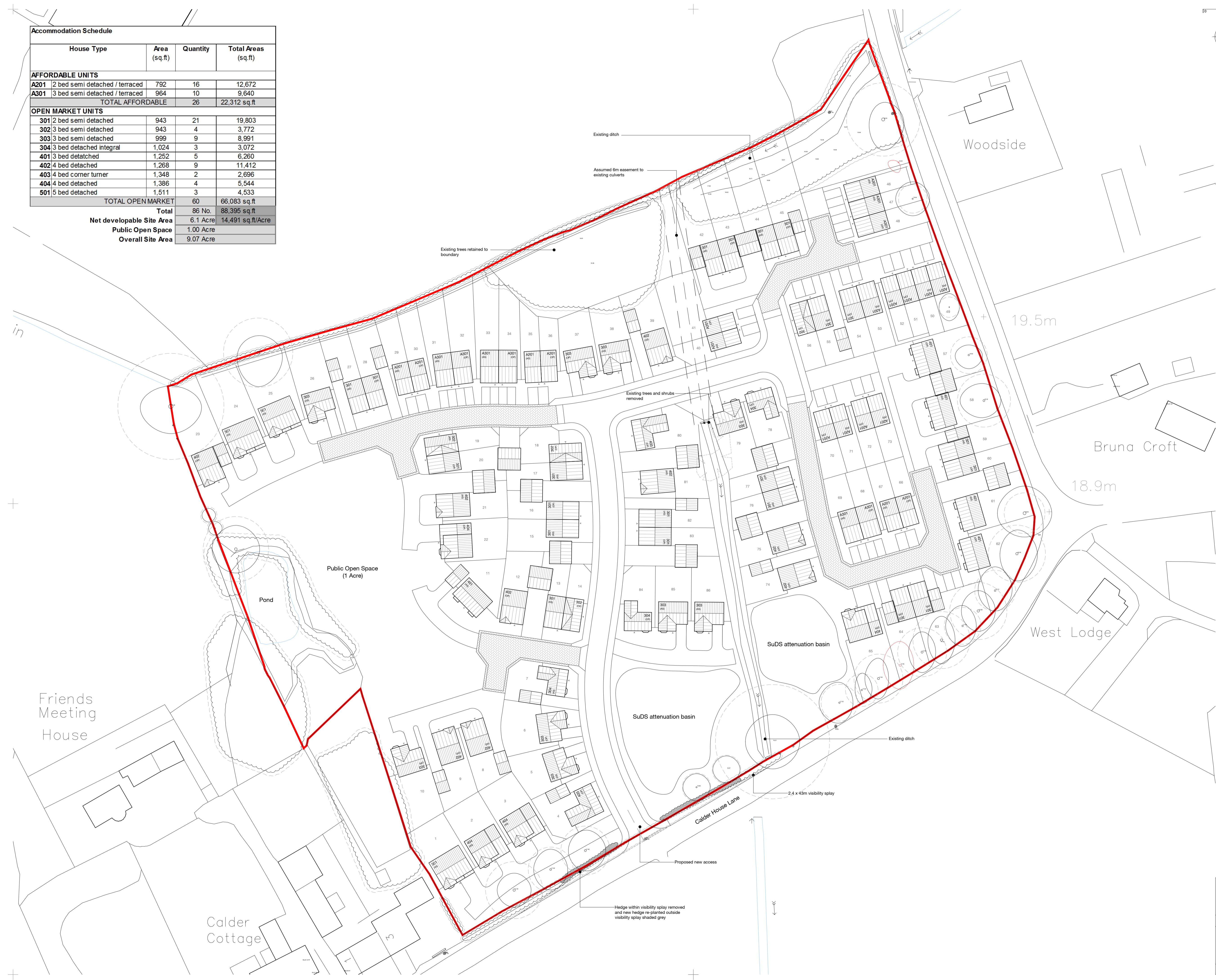
drawing	Site location
job no.	
date	16 December 2015



Appendix 2

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

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



C	12.06.18	Annotation amended	CR	GE
B	11.06.18	Attenuation ponds added, tree survey shown	CR	GE
Rev	Date	Description	Drawn	Checked
Project: Calder House Lane				
Drawing: Bowgreave				
Client: Savills				
EIM Substability Description: SUITABLE FOR INFORMATION				EIM Substability Code: S2
Status:	Preliminary	2 Riverside Way	325 City Road	
Date:	05.04.18	London	LONDON	
Drawn:	CR	1 0113 818 8041	1 0203 803 8002	
Checked:	GE	edward@edwardarchitecture.co.uk		
Scale (A1):	1:500			
0682 - EA - A - S001 - C				edward architecture

Appendix 3

Pre-Application Delegated Report Sheet

Application Number: 15/00158/PREAPP

Proposal: Pre-application meeting for proposed residential development.

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

Applicant: Carrick Sports Ltd

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

Case Officer's Report:

Meeting Date: 11th February 2016

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

1.0 RELEVANT PLANNING HISTORY

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

2.0 RELEVANT PLANNING POLICIES

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

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

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

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

NATIONAL PLANNING PRACTICE GUIDANCE (NPPG):

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

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

ADOPTED WYRE BOROUGH LOCAL PLAN (SAVED POLICIES):

2.5 The following policies are of most relevance:

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

SUPPLEMENTARY PLANNING DOCUMENT:

2.6 SPG 2 - Trees on development sites

2.7 SPG 4 - Spacing in new housing developments.

EMERGING LOCAL PLAN:

2.8 The following policies are of most relevance:

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

3.0 RELEVANT SITE CONSTRAINTS

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

4.0 PLANNING ISSUES

4.1 The main issues for consideration would be:

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

Acceptability of residential development in principle

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

Planning obligations

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

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

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

Housing mix and density

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

Residential amenity

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

Visual impact

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

Heritage impact

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

Ecological and arboricultural impact

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

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

Drainage and flood risk

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

Access and highway safety

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

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

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

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

Sustainability considerations

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

Other issues

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

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

5.0 SUBMISSION REQUIREMENTS

5.1 A full application would require the following:

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

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

6.0 OTHER

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

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

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

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

Case Officer's Signature: 

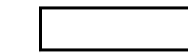
Senior Officer's Signature: 

Date: 4 March 2016

Appendix 4

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

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



Appendix D – Consultee 2 (National Grid)

DRAFT



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

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

Dear Sir / Madam

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

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

Regards



Planner

nationalgrid.uk@avisonyoung.com

avisonyoung.co.uk

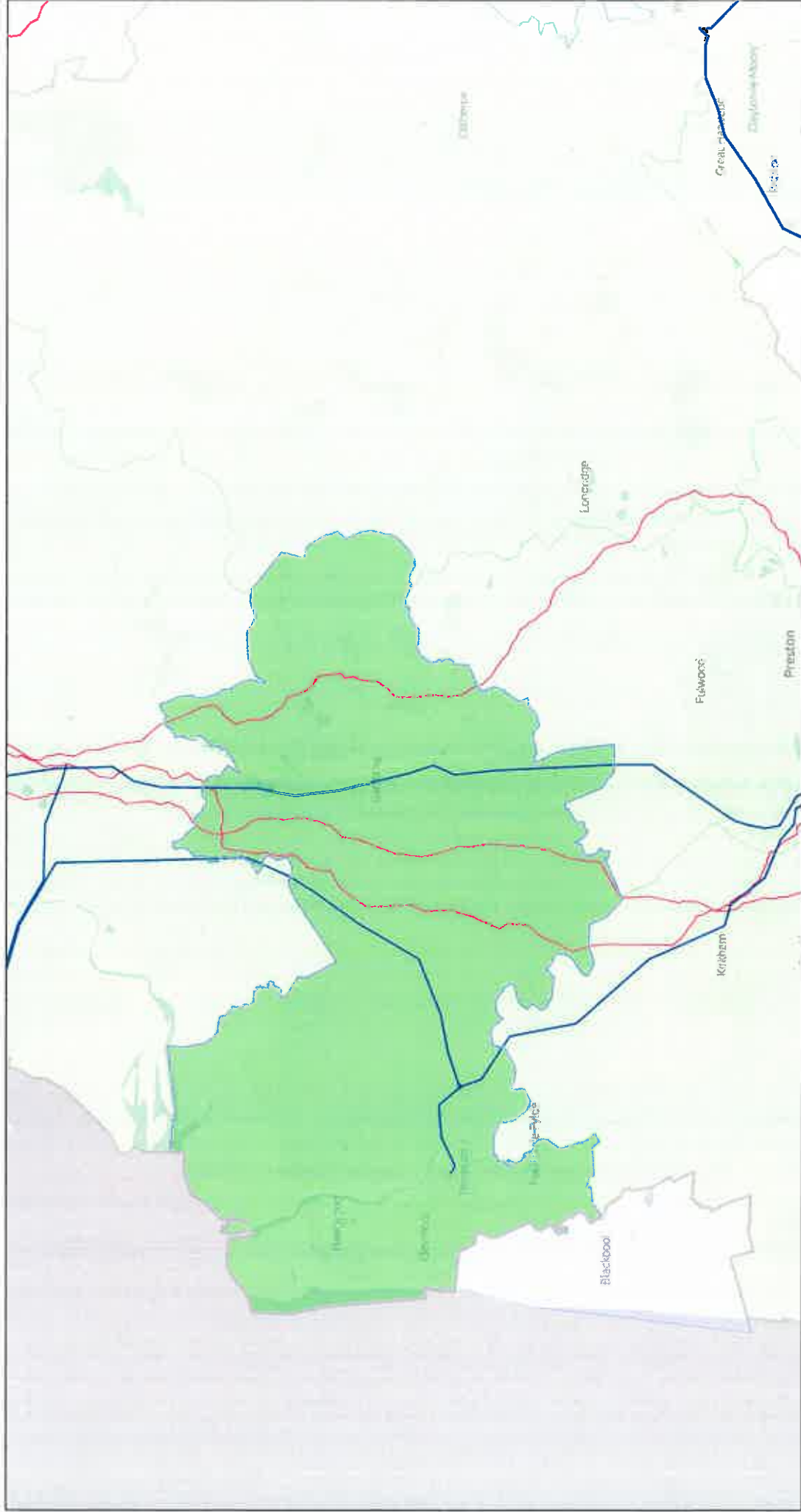
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YOUNG**



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Email secured by Check Point

Wyre Local Plan to 2031 Partial Review Scoping Consultation



14/04/2020, 11:59:02

Electric_Assets_4020

400

Electric_Assets_7634

132 & Below

Gas_Assets_6495

Development_Plan_Monitoring_Consultations_vw_1604

Development_Plan_Monitoring_v2_977_5701

Development_Plan_Monitoring_v2_977

Development_Plan_Monitoring_v2_977_422_9976

1:144,136



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Contains data from OS Zoomstack

Our Ref: MV/ 15B901605

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

14 April 2020

avisonyoung.co.uk

Wyre Council
via email only

Dear Sir / Madam

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

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

About National Grid

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

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

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

National Grid assets within the Development Plan Document area:

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

Details of the National Grid assets are provided below.

Electricity Transmission

Asset Description

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

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

Gas Transmission

Asset Description

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

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

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

Further Advice

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

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

~~0191 269 0094~~, Director

nationalgrid.uk@avisonyoung.com

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

~~0191 269 0094~~, Town Planner

box.landandacquisitions@nationalgrid.com

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

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

Yours faithfully,



~~0191 269 0094~~ MRTPI

Director

0191 269 0094

nationalgrid.uk@avisonyoung.com

For and on behalf of Avison Young

Guidance on development near National Grid assets

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

Electricity assets

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

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

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

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

Gas assets

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

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

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

How to contact National Grid

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

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

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

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

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

DRAFT

~~CONFIDENTIAL~~

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

From: ~~CONFIDENTIAL~~ <clerk@barnacrewithbondsparishcouncil.org>

Sent: 23 March 2020 10:15

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

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

Good morning,

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

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

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

Kind regards

~~CONFIDENTIAL~~

Clerk & RFO to Barnacre-with-Bonds Parish Council

Appendix F – Consultee 4 (Blackpool Council)

DRAFT

[Redacted]

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

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

Good Afternoon,

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

Kind Regards

[Redacted]

[Redacted]
Senior Planning Officer

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

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Email secured by Check Point

Date: 14th April 2020

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

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

Wyre Local Plan Partial Review - Scoping Consultation

Dear **[REDACTED]**

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

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

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

1. An update of Objectively Assessed Housing Needs.

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

(i) housing commitments and updated housing needs;

(ii) implemented and committed highway schemes;

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

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

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

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

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

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

GROWING PLACES
Blackpool Council
PO Box 17
Blackpool
FY1 1LZ

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



matter through the Duty to Co-operate.

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

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

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

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

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

Yours sincerely



Head of Planning and Transport Strategy



Appendix G – Consultee 5 (Emery Planning)

DRAFT

~~CONFIDENTIAL~~

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

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

Dear Sir/Madam

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

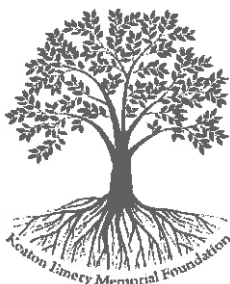
I would be grateful if you would confirm safe receipt.

Kind regards

~~CONFIDENTIAL~~

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

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



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T: 01625 433881
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www.emeryplanning.com

[REDACTED]

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

14 April 2020

EP ref: 17-366

[REDACTED]

T: 01625 442 786

[REDACTED]@emeryplanning.com

Dear [REDACTED]

Re: Wyre Local Plan Partial Review – Overall scope

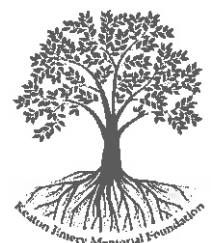
We are instructed on behalf of several clients with site interests across Wyre. We were also involved in the EIP for the adopted local plan and we are familiar with the background to the development plan.

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

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

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

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

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

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

Yours sincerely
Emery Planning

 BSc (Hons), MRTPI
Director

Appendix H – Consultee 6 (Fylde Borough Council)

DRAFT

~~CONFIDENTIAL~~

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

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

Dear sir/madam

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

Kind regards



~~Andrew Grogan~~
Principal Planning Officer (Policy)
t: 01253 658419
e: ~~and.grogan~~@fylde.gov.uk
Fylde Borough Council
www.fylde.gov.uk

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

Our Ref: Wyre reg 18

Your Ref:

Please Ask For: **[REDACTED]**

Telephone: 01253 658460

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

Date: 09 April 2020

Dear **[REDACTED]**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours sincerely



Head of Planning and Housing

Appendix I – Consultee 7 (Garstang Town Council)

DRAFT

~~CONFIDENTIAL~~

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

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

Sent: 14 April 2020 15:38

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

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

Good afternoon

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

Garstang Town Council- Scope of Partial Review

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

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

Please would you acknowledge receipt.

Thanks, ~~info@garstangtowncouncil.org~~

~~info@garstangtowncouncil.org~~

Town Clerk

Garstang Town Council

Tel: ~~01253 722180~~

www.garstangtowncouncil.org

Monday to Thursday

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Appendix J – Consultee 8 (Graham Anthony Associates)

DRAFT

Subject: FW: Wyre Local Plan Review:

From: [REDACTED]@grahamanthonyassociates.com>

Sent: 14 April 2020 10:38

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

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

[REDACTED]@grahamanthonyassociates.com>

Subject: Wyre Local Plan Review:

Good morning, Wyre

Please find attached our representations:

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

Policy DM16 – Conversion of Buildings in Rural Areas

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

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

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

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

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

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

Thanks

 MA (Hons) MRTPI

Principal Planner

Graham Anthony Associates

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

T: 01995 604514

W: GrahamAnthonyAssociates

Appendix K – Consultee 9 (Highways England)

DRAFT

[REDACTED]

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

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

FAO: Planning Policy Team, Wyre Council

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

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

Kind regards,

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

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

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

Direct Line: **[REDACTED]**

27 March 2020

Sent Via Email

Dear Sir / Madam,

Wyre Local Plan to 2031 Partial Review Scoping Consultation

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

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

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

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

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

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

development ('the Circular').

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

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

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

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

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

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

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

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

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

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

Yours faithfully,



Network Development & Planning Team

Email: @highwaysengland.co.uk

Appendix L – Consultee 10 (Hollins Strategic Land)

DRAFT

~~0161 275 2200~~

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

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

Hello,

I've attached our Statement on the Scoping Consultation.

Please could you confirm receipt?

Thanks,
~~0161 275 2200~~

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



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

Local Plan Partial Review Scoping Consultation Statement

Hollins Strategic Land
April 2020

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

Update of Objectively Assessed Housing Needs

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

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

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

Review of transport and highways issues

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

Allocation of Sites

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

Providing Greater Certainty

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

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

Cooperating with Neighbouring Authorities

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

Summary and Conclusions

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

Appendix M – Consultee 11 (Homes England)

DRAFT

[Redacted]

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

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

Hello,

Please find attached the Homes England response.

Kind regards,

[Redacted]

Manager – Partnership & Business Development



0161 200 6171

[Redacted]

1 Mann Island

Liverpool

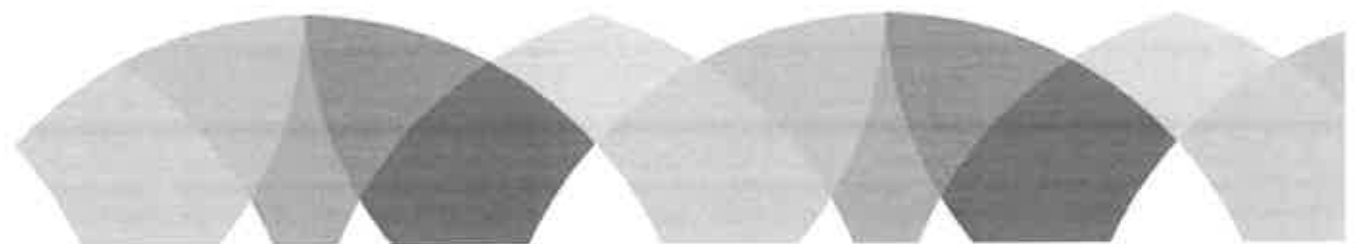
L3 1BP

[Redacted]@homesengland.gov.uk

[@HomesEngland](#)

#MakingHomesHappen

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





Homes
England

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

14TH April 2020

Dear Sir / Madam,

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

Homes England Response

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

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

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

Yours faithfully,

~~Corinna Jones~~

Head of Public Sector Land (North West)

Homes England

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

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

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

OFFICIAL

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

DRAFT

~~CONFIDENTIAL~~

Subject: FW: Regulation 18 Letter

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

Sent: 19 March 2020 16:32

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

Subject: RE: Regulation 18 Letter

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

Kind regards,

~~CONFIDENTIAL~~

Inskip-with-Sowerby Parish Clerk

~~CONFIDENTIAL~~

Appendix O – Consultee 13 (Taylor Wimpey UK Limited)

DRAFT

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

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

Dear Sir/Madam

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

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

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

Kind regards
[REDACTED]

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

lichfields.uk  



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 Think of the environment. Please avoid printing this email unnecessarily.

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

Date: 9 April 2020

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

Dear Sir / Madam

Wyre Local Plan to 2031 - Partial Review Scoping Consultation

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

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

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

Scope of the Local Plan

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

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

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

Consistency with National Policy

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

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

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

The Standard Method

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

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

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

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

“Circumstances which might justify an uplift include where²:

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

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

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

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

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

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

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

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

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

Policy LPR1 – Wyre Local Plan Review

Update of Objectively Assessed Need [OAN]

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

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

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

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

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

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

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

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

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

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

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

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

A review of transport and highway issues

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

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

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

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

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

Allocation of sites to meet the objectively assessed housing need

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

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

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

Land at Cockerham Road, Garstang

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

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

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

Conclusion

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

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

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

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



Yours faithfully


Senior Planner

Copy

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

Appendix P – Consultee 14 (Marine Management Organisation)

DRAFT

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

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

Dear Wyre planning policy team,

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

Please find the response from the Marine Management Organisation attached.

Kind regards,

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

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

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

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

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

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



Marine
Management
Organisation

Marine Planning T +44 0370 850 6506
MMO Preston www.gov.uk/mmo
Lutra House, Dodd
Way, Bamber Bridge,
PR5 8BX

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

31st March 2020

Dear Wyre planning policy team,

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

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

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

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

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

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

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



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

Part 2 - Specific comments relating to your consultation

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

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

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

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

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

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

Yours sincerely,



Marine Planner (North West)

Telephone: 0208 720 3624

Mobile: 

E-mail: @marinemanagement.org.uk

Appendix Q – Consultee 15 (Natural England)

DRAFT

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

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

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

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

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

www.gov.uk/natural-england

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

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

Date: 23 March 2020
Our ref: 310571



Planning Policy
Wyre Borough Council

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

planning.policy@wyre.gov.uk

T 0300 060 3900

BY EMAIL ONLY

Dear Sir or Madam

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

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

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

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

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

Yours faithfully

A redacted signature, appearing as a dark, irregular shape.

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

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

DRAFT

By Email Only:

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

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

Date: 6 March 2020

Dear ~~01253 891000~~

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Regards



Planning Policy and Economic Development Manager

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

DRAFT



[REDACTED]

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

Our Ref:

Your Ref:

Please Ask For: [REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]@fylde.gov.uk

Date: 24th March 2020

Dear [REDACTED]

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

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

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

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

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

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

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

Yours sincerely,



Planning Policy Manager

Appendix T – Schedule of Consultees

DRAFT

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

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

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

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

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

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

SUBMISSION DRAFT WYRE LOCAL PLAN PARTIAL REVIEW (2011-2031)

STATEMENT OF CONSULTATION - ANNEX 2

REGULATION 19 (PUBLICATION) CONSULTATION RESPONSES (SUMMARY)

APRIL 2022

Introduction

This set of spreadsheet tables provides:

Table 1	Introduction
Table 2	Record of Responses by Representor Name/Organisation
Table 3	Full index of Representations
Table 4	Summary of Representations on Legal Compliance
Table 5	Summary of Representations on the Duty to Cooperate
Table 6	Summary of Local Plan Representations (Soundness and General Local Plan Comments) by Part of Plan/Policy
Table 7	Summary of Representations on the Sustainability Appraisal
Table 8	Summary of Representations on the Habitat Regulations Assessment
Table 9	Summary of Representations on the Evidence Base
Table 10	Responses on appearance at the hearing session of the Public Examination

For the partial review Individual representors have been allocated a unique personal ID e.g. 0099.
Each representation has been given a unique reference number consisting of:

personal ID/local plan stage (P for Publication)/representation number/type of representation code
e.g. 0099/P/001/C

The type of representation code is as follows:

- B1 - Legal Compliance
- B2 - Duty to Cooperate
- GC - General Comment
- D - Sustainability Appraisal
- E - Habitat Regulations Assessment
- F - Evidence Base

Some 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.

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.

Table 2 - Record of Responses by Representor Name/Organisation

* and DNC indicates that the representor does not wish to be contacted further about the local plan.

Personal ID	Name	Organisation	Agent	DNC
0001	Warren Hilton	National Highways	n/a	n/a
0002	Deb Roberts	The Coal Authority*	n/a	DNC
0003	Robert Cooke	n/a	n/a	n/a
0004	Benjamin Rogers	Lead Local Flood Authority	n/a	n/a
0005	Ari Akinyemi	NHS Property Services	n/a	n/a
0006	John Hallas	Cloughton-on-Brock Parish Council	n/a	n/a
0007	Alexander Hazel	Environment Agency	n/a	n/a
0008	Andrea Fortune	Kingswood Homes	n/a	n/a
0009	c/o agent	on behalf of: Story Homes, Oakmere Homes, Persimmon Homes, Eric Wright Group, McDermott Homes, Wainhomes and Rowland Homes	Derek Nesbitt, Cushman and Wakefield	n/a
0010	Joanne Harding	Home Builders Federation (HBF)	n/a	n/a
0011	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	n/a
0012	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	n/a
0013	c/o agent	Ministry of Defence	Chris Waldron, Defence Infrastructure Organisation	n/a
0014	Sharron Wilkinson	Sport England	n/a	n/a
0015	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	n/a
0016	c/o agent	Wainhomes	Stephen Harris, Emery Planning	n/a
0017	Josh Plant	Gladman Developments	n/a	n/a
0018	Marcus Hudson	Lancashire County Council	n/a	n/a
0019	Roger Brooks	Garstang Town Council	n/a	n/a
0020	Matthew Symons	Hollins Strategic Land	n/a	n/a
0021	Jackie Copley	CPRE	n/a	n/a
0022	Mark Evans	Fylde Council	n/a	n/a
0023	Amy Kennedy	Natural England	n/a	n/a
0024	Hannah Jones	Homes England (LATE RESPONSE)	n/a	n/a

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)**STATEMENT OF CONSULTATION - Annex 2****RESPONSES TO THE PUBLICATION DRAFT NOVEMBER 2021****Table 3 - Full Index of Representations**

* indicates that the representor does not wish to be contacted further about the local plan.

Personal ID	Unique Ref	Name	Organisation	Agent	Local Plan Ref./SA (D) Ref
0001	0001/P/001/GC	Warren Hilton	National Highways	n/a	n/a
0001	0001/P/002/D	Warren Hilton	National Highways	n/a	n/a
0002	0002/P/001/GC	Deb Roberts	The Coal Authority*	n/a	n/a
0003	0003/P/001/GC	Robert Cooke	n/a	n/a	n/a
0003	0003/P/002/GC	Robert Cooke	n/a	n/a	n/a
0003	0003/P/003/GC	Robert Cooke	n/a	n/a	Chapter 6 CDMP2 Flood Risk and Surface Water Management
0003	0003/P/004/GC	Robert Cooke	n/a	n/a	n/a
0003	0003/P/005/GC	Robert Cooke	n/a	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0003	0003/P/006/GC	Robert Cooke	n/a	n/a	n/a
0003	0003/P/007/GC	Robert Cooke	n/a	n/a	n/a
0004	0004/P/001/GC	Benjamin Rogers	Lead Local Flood Authority	n/a	n/a
0005	0005/P/001/GC	Ari Akinyemi	NHS Property Services Ltd	n/a	Chapter 5 SP1 Development Strategy (new)
0005	0005/P/002/GC	Ari Akinyemi	NHS Property Services Ltd	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0006	0006/P/001/GC	John Hallas	Cloughton-on-Brock Parish Council	n/a	n/a
0007	0007/P/001/B1	Alexander Hazel	Environment Agency	n/a	n/a
0007	0007/P/002/GC	Alexander Hazel	Environment Agency	n/a	n/a
0007	0007/P/003/GC	Alexander Hazel	Environment Agency	n/a	Chapter 6 CDMP4 Environmental Assets
0007	0007/P/004/GC	Alexander Hazel	Environment Agency	n/a	Chapter 2 SP2 Sustainable Development
0007	0007/P/005/D	Alexander Hazel	Environment Agency	n/a	n/a
0008	0008/P/001/GC	Andrea Fortune	Kingswood Homes	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0008	0008/P/002/GC	Andrea Fortune	Kingswood Homes	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0008	0008/P/003/GC	Andrea Fortune	Kingswood Homes	n/a	Chapter 9 Site Allocations
0008	0008/P/004/GC	Andrea Fortune	Kingswood Homes	n/a	Chapter 9 Site Allocations Omission Site
0009	0009/P/001/F	c/o agent	Development Consortium	Cushman & Wakefield	Viability Appraisal
0009	0009/P/002/GC	c/o agent	Development Consortium	Cushman & Wakefield	Chapter 5 §5.7.2 (new)
0010	0010/P/001/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 1 §1.2.5 and 1.2.6 (new)
0010	0010/P/002/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 4 §4.1.6 (new)
0010	0010/P/003/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 5 SP1 Development Strategy (new)
0010	0010/P/004/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)

0010	0010/P/005/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 7 HP3 Affordable Housing (new)
0010	0010/P/006/GC	Joanne Harding	Home Builders Federation	n/a	Chapter 7 HP4 Exception Sites (new)
0011	0011/P/001/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)
0011	0011/P/002/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 4 §4.1.6 (new)
0011	0011/P/003/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 5 SP1 Development Strategy (new)
0011	0011/P/004/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 7 HP1 Housing Requirement and Supply (new)
0011	0011/P/005/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 7 HP3 Affordable Housing (new)
0011	0011/P/006/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 7 HP4 Rural Exceptions (new)
0011	0011/P/007/GC	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Chapter 9 Site Allocations
0012	0012/P/001/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)
0012	0012/P/002/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)
0012	0012/P/003/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)
0012	0012/P/004/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)
0012	0012/P/005/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP3 Affordable Housing (new)
0012	0012/P/006/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)
0012	0012/P/007/GC	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Chapter 9 Site Allocations
0013	0013/P/001/GC	c/o agent	Ministry of Defence	Chris Waldron, Defence Infrastructure Organisation	n/a
0014	0014/P/001/GC	Sharron Wilkinson	Sports England	n/a	Chapter 5 §5.4.3
0014	0014/P/002/GC	Sharron Wilkinson	Sports England	n/a	Chapter 6 §6.4.3 (new)
0015	0015/P/001/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 9 Site Allocations
0015	0015/P/002/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)
0015	0015/P/003/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)
0015	0015/P/004/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)
0015	0015/P/005/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)
0015	0015/P/006/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP3 Affordable Housing (new)
0015	0015/P/007/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)
0015	0015/P/008/GC	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Chapter 9 Site Allocations
0016	0016/P/001/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 10 LPR1 Wyre Local Plan Review
0016	0016/P/002/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0016	0016/P/003/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0016	0016/P/004/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0016	0016/P/005/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0016	0016/P/006/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0016	0016/P/007/GC	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)
0017	0017/P/001/GC	n/a	Gladman	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)

0017	0017/P/002/GC	n/a	Gladman	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0018	0018/P/001/D	Marcus Hudson	Lancashire County Council	n/a	n/a
0018	0018/P/002/GC	Marcus Hudson	Lancashire County Council	n/a	n/a
0018	0018/P/003/GC	Marcus Hudson	Lancashire County Council	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0019	0019/P/001/B1	Rodger Brook	n/a	n/a	n/a
0019	0019/P/002/GC	Rodger Brook	n/a	n/a	n/a
0019	0019/P/003/GC	Rodger Brook	n/a	n/a	Appendix A (new)
0019	0019/P/004/GC	Rodger Brook	n/a	n/a	Chapter 1 §1.2.9
0020	0020/P/001/GC	Matthew Symons	Hollins Strategic Land	n/a	Chapter 7 HP1 Housing Requirement and Supply (new)
0020	0020/P/002/GC	Matthew Symons	Hollins Strategic Land	n/a	Chapter 9 Site Allocations
0021	0021/P/001/GC	Jackie Copley	CPRE	n/a	n/a
0021	0021/P/002/GC	Jackie Copley	CPRE	n/a	n/a
0021	0021/P/003/GC	Jackie Copley	CPRE	n/a	n/a
0021	0021/P/004/GC	Jackie Copley	CPRE	n/a	Content
0021	0021/P/005/GC	Jackie Copley	CPRE	n/a	Chapter 1 §1.4.1-1.4.3 (new)
0021	0021/P/006/GC	Jackie Copley	CPRE	n/a	Chapter 1 §1.2.1-1.2.13 (new)
0021	0021/P/007/GC	Jackie Copley	CPRE	n/a	Chapter 4 Footnote 16 (new)
0021	0021/P/008/GC	Jackie Copley	CPRE	n/a	Chapter 4 §4.1.11
0021	0021/P/009/GC	Jackie Copley	CPRE	n/a	Chapter 4 §4.1.12
0021	0021/P/010/GC	Jackie Copley	CPRE	n/a	Chapter 4 §4.1.6
0021	0021/P/011/GC	Jackie Copley	CPRE	n/a	Chapter 5 §5.4.3
0021	0021/P/012/GC	Jackie Copley	CPRE	n/a	Chapter 5 §5.4.4
0021	0021/P/013/GC	Jackie Copley	CPRE	n/a	Chapter 5 §5.1.1
0021	0021/P/014/GC	Jackie Copley	CPRE	n/a	Chapter 5 SP4 Countryside Areas (new)
0021	0021/P/015/GC	Jackie Copley	CPRE	n/a	Chapter 5 §5.7.2 (new)
0021	0021/P/016/GC	Jackie Copley	CPRE	n/a	Chapter 6 §6.4.3 (new)
0021	0021/P/017/GC	Jackie Copley	CPRE	n/a	Chapter 7
0021	0021/P/018/GC	Jackie Copley	CPRE	n/a	Chapter 7 §7.2.2
0021	0021/P/019/GC	Jackie Copley	CPRE	n/a	Chapter 7 §7.2.3
0021	0021/P/020/GC	Jackie Copley	CPRE	n/a	Chapter 7 §7.2.4
0021	0021/P/021/GC	Jackie Copley	CPRE	n/a	Chapter 7 §7.2.6 (new §7.2.5)
0022	0021/P/022/GC	Jackie Copley	CPRE	n/a	Chapter 7 HP3 Affordable Housing (new)
0022	0021/P/023/GC	Jackie Copley	CPRE	n/a	Chapter 7 HP4 Exception Sites (new)
0022	0021/P/024/GC	Jackie Copley	CPRE	n/a	Chapter 8 EP5 Main Town Centre Uses (new)
0022	0021/P/025/GC	Jackie Copley	CPRE	n/a	Chapter 9 §9.2.1
0022	0022/P/001/GC	Mark Evans	Fylde Council	n/a	n/a

0022	0022/P/002/GC	Mark Evans	Fylde Council	n/a	Chapter 1 §1.2.7
0022	0022/P/003/GC	Mark Evans	Fylde Council	n/a	Chapter 1 §1.2.9 (new)
0022	0022/P/004/GC	Mark Evans	Fylde Council	n/a	Chapter 4 §4.1.12
0022	0022/P/005/GC	Mark Evans	Fylde Council	n/a	Chapter 5 §5.1.1
0022	0022/P/006/GC	Mark Evans	Fylde Council	n/a	Chapter 5 SP4 Countryside Areas (new)
0022	0022/P/007/GC	Mark Evans	Fylde Council	n/a	Chapter 7 HP1 Housing Land Supply (new)
0022	0022/P/008/GC	Mark Evans	Fylde Council	n/a	Chapter 7 §7.2.3
0022	0022/P/009/GC	Mark Evans	Fylde Council	n/a	Chapter 9 §9.2.1
0022	0022/P/010/GC	Mark Evans	Fylde Council	n/a	Chapter 9 §9.2.1
0022	0022/P/011/GC	Mark Evans	Fylde Council	n/a	Appendix A (new)
0022	0022/P/012/D	Mark Evans	Fylde Council	n/a	SA Reasonable Alternative Option
0022	0022/P/013/B2	Mark Evans	Fylde Council	n/a	Draft Statement of Common Ground and Duty to Cooperate Statement of Compliance
0022	0022/P/014/F	Mark Evans	Fylde Council	n/a	LPR1 Background Paper
0022	0022/P/015/F	Mark Evans	Fylde Council	n/a	Housing Implementation Strategy (HIS) Partial Review
0023	0023/P/001/GC	Amy Kennedy	Natural England	n/a	n/a
0023	0023/P/002/D	Amy Kennedy	Natural England	n/a	n/a
0023	0023/P/003/E	Amy Kennedy	Natural England	n/a	n/a
0024	0024/P/001/GC	Nicola Elsworth	Homes England	n/a	n/a

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT NOVEMBER 2021

TABLE 4 - Summary of Representations on Legal Compliance (B1)

Unique Ref	Name/Organisation	Legally compliant? Y/N	Legal Compliance - Summary of Representation	Response
0007/P/001/B1	Alexander Hazel - Environment Agency	Y	No issues in terms of legal compliance.	Noted
0019/P/001/B1	Rodger Brook	Y	I consider the Local Plan 2011-2031 to be legally prepared.	Noted

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT 2021

Table 5 - Summary of Representations on the Duty to Cooperate (B2)

Unique Ref	Name	Meets the DTC? Y/N	DTC - Summary of Representation	Response
0022/P/013/B2	Mark Evans, Fylde Council	n/a	<ul style="list-style-type: none">● Thank you for inviting Fylde Council to comment on the Publication Draft Wyre Local Plan Partial Review (2011-2031) (PR). The two councils have maintained dialogue and engagement concerning the progress of our respective partial reviews through the Fylde Coast Duty to Cooperate Meetings in line with the governance provided by the Duty to Co-operate Memorandum of Understanding between the Fylde Coast Authorities and Lancashire County Council and through direct engagement between officers. We will continue to work with Wyre Council in relation to cross-boundary strategic matters in support of your partial review.● Draft Statement of Common Ground and Duty to Cooperate Statement of Compliance §5.19 should be updated to say Fylde Council adopted the Fylde Local Plan 2032 (incorporating Partial Review) on 6th December 2021. It provides for Wyre's unmet need of 380 dwellings in full. However, as Wyre have lowered their housing requirement by using the standard method, there is no longer any requirement for Fylde to assist in meeting unmet need.● Draft Statement of Common Ground and Duty to Cooperate Statement of Compliance Annex 1 and 2 §6.8 is out of date because it states that Wyre's unmet need of 380 still exists, it should clarify that there is no longer any unmet need as the housing requirement has been recalculated by using the standard method and there is no longer any requirement for Fylde to assist in meeting any unmet need.	<ul style="list-style-type: none">● Noted.● Following further engagement with Fylde Council, the Statement of Common Ground and Duty to Cooperate Statement of Compliance has been updated to reflect the adoption of the Fylde Local Plan in 2021.● The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net).● Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings● If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review.● On this basis there is no unmet need in Wyre that falls to be considered by neighbouring local authorities.

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF

CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT NOVEMBER 2021

Table 6 - Summary of Local Plan Representations (Soundness and General Local Plan Comments) By Part of Plan/Policy

Unique Ref	Name/ Organisation	LP Ref	Is the Plan sound? Y/N	If NO, Reason	Summary of Representation	Modifications Required	Response	Code
0001/P/001/GC	Warren Hilton - National Highways	n/a	n/a	n/a	No comment.	n/a	Noted.	n/a
0002/P/001/GC	Deb Roberts - The Coal Authority	n/a	n/a	n/a	Wyre Council lies outside the defined coalfields and therefore the Coal Authority has no specific comments.	n/a	Noted.	n/a
0003/P/001/GC	Robert Cooke	n/a	n/a	n/a	I was very impressed with the range and depth being considered in the documentation and if local people have a real say in what is decided there is hope that we will see common sense prevail. The fear is that when local people oppose a development (destruction?) the developer simply arranges for an "inspector" from the South to have a jolly day on expenses, see a green patch, and say "Yes, build on that".	n/a	Noted.	n/a
0003/P/002/GC	Robert Cooke	n/a	n/a	n/a	There is concern that a low level of qualifications is a deterrent to inward investment, but one could also say that the type of employment available in the area does not attract better-qualified youngsters to remain local. Then again, what do we mean by better qualified when the area has many skilled tradesmen? We also have to consider that the nature of a seaside area is that it has, for part of the year, a large number of temporary jobs which are inevitably low-paid and should be considered separately from the basic structure of the borough.	n/a	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. This representation is in relation to the economic development strategy, which falls outside the scope of this partial review.	n/a
0003/P/004/GC	Robert Cooke	n/a	n/a	n/a	There are apparently 22 brownfield sites in the Borough, but seemingly only two being currently assessed. At the same time we are told that the best and most versatile agricultural land should be protected from "inappropriate" development. I would submit that in these areas all development is "inappropriate" and in view of some of the excellent use that has been made of brownfield sites I would suggest that these receive urgent priority when developers start to sniff around.	n/a	<ul style="list-style-type: none"> Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. This representation is in relation to the development strategy, which falls outside the scope of this partial review. Of the 22 brownfield sites currently recorded on the Brownfield Register for the borough, 15 of them contribute to the housing supply figures and three of those sites are allocated for residential development in the adopted Wyre Local Plan. 	n/a
0003/P/006/GC	Robert Cooke	n/a	n/a	n/a	There is a statement that reducing the carbon footprint should be a priority. I submit that for two reasons this will be impossible. Firstly, with all the building in the Borough the volume of traffic has vastly increased on roads which were never designed for it and in places like Poulton a small collision results in severe jams with cars sitting for ages pumping out exhaust fumes. Secondly, in some	n/a	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. Climate change falls outside the scope of this Partial Review. The Full Review of the Local Plan will consider mitigating the impact of and adapting to climate change.	n/a

					"developments" a large peat covering has been removed, thereby removing the carbon sponge.			
0003/P/007/GC	Robert Cooke	n/a	n/a	n/a	We live in a wonderful, beautiful area, and I was very pleased to see the concern shown in relation to biodiversity. However I was greatly concerned by the admission that by using greenfield sites biodiversity is lost: this is obvious! I was even more concerned by the statement that by using biodiversity enhancing policies elsewhere there can be a net gain in biodiversity! Leave it to Mother Nature and keep off the greenfield sites. Too much of the Fylde has been destroyed in the last five years. Let those who live here now enjoy what is left.	n/a	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. This representation is in relation to the development strategy and Policy CDMP4 Environmental Assets, which falls outside the scope of this partial review.	n/a
0004/P/001/GC	Lead Local Flood Authority (LLFA)	n/a	n/a	n/a	<ul style="list-style-type: none"> No comment on partial review of the Local Plan - it does not have any implications on local flood risk management. LLFA is keen to engage with Wyre Council on the upcoming full review of the Local Plan. The LLFA submitted comments for consideration for the full review. 	n/a	<ul style="list-style-type: none"> Noted. Full Review comments submitted by the LLFA will be considered as part of the full review process. 	n/a
0006/P/001/GC	Claughton-on-Brock Parish Council	n/a	n/a	n/a	<ul style="list-style-type: none"> Climate change should be included within the scope of the Partial Review. Planning Policy should require installation of communal ground source heating systems as part of new developments of three or more houses. Fitting systems during construction is better than retrofitting. 	n/a	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. Climate change falls outside the scope of this Partial Review. The Full Review of the Local Plan will consider mitigating the impact of and adapting to climate change.	n/a
0007/P/002/GC	Alexander Hazel - Environment Agency	n/a	Y	n/a	No issues in terms of soundness.	n/a	Noted.	n/a
0013/P/001/GC	Ministry of Defence c/o Chris Waldron, Defence Infrastructure Organisation	n/a	n/a	n/a	No concerns or suggested amendments to the current consultation.	n/a	Noted.	n/a
0018/P/002/GC	Marcus Hudson, Lancashire County Council	n/a	n/a	n/a	<ul style="list-style-type: none"> School provision team forecast five-year position to forecast likely need for additional school places. This will assist planning officers to plan where housing growth will be and the infrastructure required. The partial review provides information on the new housing figure, however it does not provide details of the specific planning areas. Detail is required of how the 5,192 dwellings will be allocated on the sites SA1, SA3 and SA4. At a point in time, it would be appreciated if this information could be provided. LCC can then advise which specific planning areas require further review and investment of additional pupil places. 	n/a	<ul style="list-style-type: none"> Noted. The Partial Review retains all existing site allocations in the adopted Local Plan. The existing site allocations were previously assessed by Lancashire County Council's School Provision Team during the preparation of the now adopted Local Plan, this informed the infrastructure requirements for the Local Plan. 	n/a
0019/P/002/GC	Rodger Brook	n/a	Y	n/a	I consider the Local Plan 2011-2031 to be Sound.	n/a	Noted.	n/a

0021/P/001/GC	Jackie Copley, CPRE	n/a	n/a	n/a	<ul style="list-style-type: none"> Government mandate use of ONS 2014 data which shows higher population growth rate, ONS 2016, 2018 and 2020 all show slower growth rates. This leads to higher housing growth rates, job and housing targets. This promotes development of greenfields including Green Belt in advance of brownfield. NPPF is a developer charter. Planning reform needed, to reflect public opinion about value of the environment. 	n/a	<ul style="list-style-type: none"> Noted. The partial review retains all existing site allocation in the adopted Local Plan. The council has enough land to meet identified needs and the partial review has not allocated additional site allocations. 	n/a
0021/P/002/GC	Jackie Copley, CPRE	n/a	n/a	n/a	Links provided to CPRE's Recycling out Land: The state of brownfield report, 2021 and brownfield land register toolkit.	The council should amend the local plan to allocate more previously developed land and avoid Green Belt loss.	<ul style="list-style-type: none"> Noted. The partial review retains all existing site allocation in the adopted Local Plan. The council has enough land to meet identified needs and the partial review has not allocated additional site allocations. 	n/a
0021/P/003/GC	Jackie Copley, CPRE	n/a	n/a	n/a	<ul style="list-style-type: none"> Developers should be encouraged to better design schemes to maximising clean energy and insulation (Building for a Healthy Life) with no loss of our natural assets including biodiversity, tranquillity, high grade farmland, mature woodland, trees and hedgerows. Mitigation and compensation must be adequate and enforceable. Developments that do not support climate and biodiversity goals should be refused. The local plan should plan for needs and protect and conserve Wyre's important natural assets. There is a declared climate emergency, and the area is liable to flooding. 	n/a	<ul style="list-style-type: none"> Noted. The adopted Local Plan policy CDMP3 Design requires a high standard of design to accord with criterion, including minimising energy consumption. The council acknowledge the move towards a mandatory Biodiversity Net Gain (BNG) figure established by the Environment Act. This will be addressed in full by the full review of the Wyre Local Plan (currently at Regulation 18 scoping stage) taking into account any up-to-date planning guidance and regulations. It will be the role of the full review to consider the implications from the council declaring a climate emergency. 	n/a
0022/P/001/GC	Mark Evans, Fylde Council	n/a	n/a	n/a	It is noted that the Scope of the partial review has narrowed to exclude some of the changes introduced by the NPPG19.	n/a	<ul style="list-style-type: none"> Fylde Council have not specified the matters the partial review has excluded, that were introduced by the NPPF19. Implementation of Policy LPR1 Background Paper §7.1-7.4 sets out that this partial review has considered the substantive revisions that have arisen by reviewing the NPPF 21 (the most up to date version) against the NPPF 12 only. Where there are substantive revisions in the NPPF 21 against the NPPF 12 that the council could not consider when preparing the WLP31, the council has then considered the implications. This has not involved a review of all policies, which will be the role of the Local Plan Full Review (currently at Regulation 18 scoping stage) rather than this partial review. 	n/a
0023/P/001/GC	Amy Kennedy, Natural England	n/a	n/a	n/a	No objection to the proposed schedule of revisions.	n/a	Noted.	n/a
0024/P/001/GC (LATE RESPONSE)	Nicola Elsworth, Homes England	n/a	n/a	n/a	No representations on the current consultation.	n/a	Noted.	n/a

0021/P/004/GC	Jackie Copley, CPRE	Content	n/a	n/a	CPRE objects to the deletion of 'The Duty to Cooperate'. This is because it is a key aspect of local plan making, especially in rural areas where environmental sensitivity and constraints can lead to urban neighbours delivering part of any unmet need. It is more appropriate for urban areas in need of revitalisation to be the focus of new housing investment to tackle any constraints and make the most effective use of previously developed land as set out in NPPF Section 11 and a focus of the 35% urban uplift of the revised Standard Method. Wyre ought not to forget about this joined up approach. Wyre does not have to provide for all its housing needs, even a reduced quantum now identified, if it is evidenced that there are more sustainable sites in neighbouring authority areas.	n/a	<ul style="list-style-type: none"> Noted. The existing text within the adopted Local Plan §1.4 on the 'Duty to Co-operate' is proposed to be deleted as it is focused on the requirement for the partial review. Updated text on Duty to Co-operate is included in the proposed new §1.2.1-1.2.13. The proposed deletion of §1.4 does not remove Duty to Co-operate. 	n/a
0021/P/006/GC	Jackie Copley, CPRE	Chapter 1 §1.2.1-1.2.13 (new)	n/a	n/a	<ul style="list-style-type: none"> CPRE supports the revision of a reduced housing requirement to 296 dwellings per annum (dpa), however CPRE continues to recommend that the Council should reduce further the number of houses focused on rural Wyre. CPRE previously commented on Publication Local Plan consultation in 2017 that Turley's calculation was too high. Adopted 460dpa inevitably caused the council to fail the Housing Delivery Test (HDT), despite it achieving 376 completions. This 'deemed failure' led to further greenfield land never intended for development, obtaining planning consent due to five-year housing land supply rule. This included loss of prime agricultural land, such as Arthur's Lane, Hambleton. Rural housing in remote areas leads to increase in car journeys. Previous requirement was 155% of the target it should have been, which meant that more housing delivered than is now considered necessary. Completions were at 127% of the new proposed target so 'over-performance'. Much less greenfield should be allocated over remaining plan period, certainly no requirement for additional greenfield loss as there are significant environmental costs from development. Council should resist pressure to impose inflated housing numbers as the council will have to ensure performance against it. Future failure against HDT will lead to more unnecessary loss of farmland. Governments 2014 population growth data is out of date. Welcome revised Standard Method. Still a need for improvement as affordability assumptions flawed. 	Reduce housing focused on rural Wyre.	<ul style="list-style-type: none"> Noted. The partial review meets the identified need, in accordance with national policy. Wyre Council continues to exceed the Housing Delivery Test (HDT) measure. Arthurs Lane, Hambleton is allocated in the adopted Local Plan under site reference SA1/10. 	n/a
0010/P/001/GC	Joanne Harding - Home Builders Federation	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	General support for standard method as the starting point to assess housing need for the area. Housing need likely to be higher than the housing requirement currently identified.	n/a	Noted. See responses to 0010/P/001/GC continued.	n/a

0010/P/001/GC continued	Joanne Harding - Home Builders Federation	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	PPG sets out circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method: growth strategies for the area; and strategic infrastructure improvements. Council should investigate this.	n/a	The Implementation of Policy LPR1 Background Paper §3.1-3.2 has considered if there are circumstances where it may be appropriate to include an uplift where housing needs are likely to exceed past trends. In summary, in Wyre: there are no Housing Deals; no strategic infrastructure improvements likely to increase the homes needed locally; or no requirement to take unmet housing need from any neighbouring authority. Therefore, there are no circumstances in the borough of Wyre where it would be appropriate to include an uplift.	n/a
0010/P/001/GC continued	Joanne Harding - Home Builders Federation	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> ● PPG sets out circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method where previous level of delivery or previous assessments of need are significantly greater than the outcome of the standard method. Council should investigate this. ● Proposed housing requirement is a significant decrease from current adopted Local Plan required of 460dpa. Also significantly below 433dpa delivered on average over 2016/17-2020/21. Housing requirement should be increased to better reflect this evidence. 	n/a	<ul style="list-style-type: none"> ● The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. ● The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. ● It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. ● Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant flexibility in supply over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	n/a
0010/P/001/GC continued	Joanne Harding - Home Builders Federation	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Affordable housing evidence not updated. Adopted Local Plan identified annual need for 134dpa up to 2022, rising to 189dpa afterwards. Identified affordable housing need would be a significant proportion of the housing requirement. Housing requirement should be increased to allow for this affordable housing need to be met.	n/a	<ul style="list-style-type: none"> ● The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. ● The NPPF and PPG do not require the affordable housing need to be met in full. ● It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. ● Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. ● The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked 	n/a

							into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required.	
0010/P/001/GC continued	Joanne Harding - Home Builders Federation	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Employment land requirement is not amended. Reduced housing requirement will lead to an imbalance between economic and residential development. Housing requirement should be increased to allow for an appropriate balance and help create a more sustainable area.	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0011/P/001/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Do not support 296dpa housing requirement as represents the 'do minimum' option. NPPF §61 clear that to determine minimum number of homes, strategic policies should be informed by a local housing need (LHN) assessment, using standard method. LHN represents the minimum starting point.	n/a	Noted. See responses to 0010/P/001/GC continued.	n/a

0011/P/001/GC continued	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Housing need is much higher than the proposed housing requirement of 296dpa. PPG sets out circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method: growth strategies for the area and strategic infrastructure improvements. Council has not comprehensively justified the decision to use minimum LHN figure of 296dpa.	n/a	<ul style="list-style-type: none"> • The Implementation of Policy LPR1 Background Paper §3.1-3.2 has considered if there are circumstances where it may be appropriate to include an uplift where housing needs are likely to exceed past trends. In summary, in Wyre: there are no Housing Deals; no strategic infrastructure improvements likely to increase the homes needed locally; or no requirement to take unmet housing need from any neighbouring authority. Therefore, there are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. • It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. 	n/a
0011/P/001/GC continued	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> • PPG sets out circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method where previous level of delivery or previous assessments of need are significantly greater than the outcome of the standard method. • Proposed housing requirement is a significant decrease from current adopted Local Plan required of 460dpa (36% decrease) and significantly below 433dpa delivered on average over 2016/17-2020/21 (32% decrease). Proposed housing requirement is significantly lower than current Local Plan and current delivery rate in the borough, concern that insufficient land will be allocated to meet the actual housing requirements/demands. Fail to deliver significant boost to housing supply. Point further emphasised by Wyre's strong housing delivery test of 176% in 2021. • Council has not comprehensively justified the decision to use minimum LHN figure of 296dpa. 	n/a	<ul style="list-style-type: none"> • The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. • The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. • It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. • Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This results in significant flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. T • There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. 	n/a

0011/P/001/GC continued	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Employment land requirement is not amended. Reducing the housing requirement will lead to an imbalance between economic and residential development.	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0011/P/001/GC continued	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 1 §1.2.5 and 1.2.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Reduced housing requirement will not supporting strategies such as Enterprise Zone at Hillhouse.	n/a	<ul style="list-style-type: none"> • The Hillhouse Technology Enterprise Zone (EZ) located in Thornton became live in 2015. A masterplan for the site was developed in 2018 to guide and facilitate the delivery of the EZ. • The Wyre Employment Land Study Addendum II prepared in 2017 considered the consequences of the EZ. The masterplan at the time projected net job growth of 900 jobs by 2035, or 50 jobs per year. The 2017 job projections indicated at least 125 new energy jobs and a further 120 new chemical manufacturing jobs being generated in the short term. • To deliver this, unlocking the northern part of the EZ requires significant infrastructure requirements. • Since 2017, the projected jobs have not materialised, with the loss of the proposed gas fired power station, large scale waste to energy plant and speculative development zone. There was also the unexpected loss of 60 jobs following the closure of the Vinnolit facility and wider job loss due to the effects of Covid-19. Whilst grant funding has been secured towards some essential infrastructure upgrades, that could allow some speculative development to progress, significant infrastructure is still required to unlock the northern site. It is clear that the job projections for the EZ considered by the now adopted Local Plan have not now materialised over the last five years. • The updated job projections for the site and its consequences for the Local Plan will be considered within the full review currently underway. 	n/a

0022/P/002/GC	Mark Evans, Fylde Council	Chapter 1 §1.2.7	n/a	n/a	§1.2.7 indicates that reference to OAN/OAHN should now be used interchangeably with the term "housing requirement". This is confusing as the OAN/OAHN and housing requirement figures were different in the existing plan. The difference between these figures provided the whole necessity and justification for the inclusion of Policy LPR1 in the existing plan, and by extension is the reason why Policy LPR1 triggers the Partial Review of the plan.	Update §1.2.7 to explain the difference between OAN/OAHN, the housing requirement up to 2018/19 and how this unmet need (152 dwellings) is addressed.	The proposed text at §1.2.7 has to be read in context of the proposed schedule of revisions for the whole plan. It is not considered necessary to explain terminology that is relevant to the adopted Local Plan which will be superseded by this partial review.	n/a
0022/P/002/GC continued	Mark Evans, Fylde Council	Chapter 1 §1.2.7	n/a	n/a	No explanation within the plan as to whether the increased housing requirement in the Fylde Local Plan to 2032 (incorporating Partial Review) of 380 dwellings to address the total unmet need in the existing plan is considered to address this, or whether instead the Partial Review itself provides for this by the headroom between 9,423 supply figure and the 7,232 total requirement.	n/a	<ul style="list-style-type: none"> • The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). • Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings • If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. • On this basis there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	n/a
0019/P/004/GC	Rodger Brook	Chapter 1 §1.2.9	n/a	n/a	Proposed revision on page 12 (<i>referring to proposed new §1.2.9</i>) refers to there no longer being a need to review highway evidence, having regular experience of the exponential increase of quantity, size, weight and speed of motor vehicles of all varieties along the A6 between Barton and Forton and feeder roads generated by development to date I am disappointed by the Council's view that there should be no review of the highway and transport evidence. It is my opinion that further and dramatic measures need to be considered to disperse and regulate traffic along the A6.	n/a	<ul style="list-style-type: none"> • Noted. • The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. The requirement of Policy LPR1 is to meet in full the housing OAN. It is within this context that a review of transport and highway evidence has been undertaken. As set out in the Implementation of Policy LPR1 Background Paper §4.4, the approach to Policy LPR1 is to firstly review housing need and then to carry out a review of transport and highways constraints for the purpose of ascertaining whether that OAN could be met in Wyre. As the updated housing requirement is a lower figure than the adopted figure of 460dpa and the housing requirement can be met within the existing highway network, a review of the transport and highway evidence is therefore not required for this Partial Review. The three transport highway authorities support this position. 	n/a
0022/P/003/GC	Mark Evans, Fylde Council	Chapter 1 §1.2.9 (new)	n/a	n/a	This new text will need altering again because the partial review may be adopted and this would then be confusing.	In reference to the new text "no revisions to the existing housing land supply set out in the adopted Local Plan is <u>are</u> proposed"	Noted. Minor modification proposed to correct typo/tense.	P/M/02
0021/P/005/GC	Jackie Copley, CPRE	Chapter 1 §1.4.1-1.4.3 (new)	n/a	n/a	First Homes. CPRE disagrees that 'First Homes' are in perpetuity 'genuinely' affordable homes, as 80% of market value is still out of reach of most people.	n/a	Noted. This response has no implications for the partial review.	n/a

0007/P/004/GC	Alexander Hazel - Environment Agency	Chapter 2 SP2 Sustainable Development	n/a	n/a	<ul style="list-style-type: none"> • The LPA should consider policy amendment for biodiversity net gain (BNG) provision, where scope allows in regard to NPPF 2021 conformity. • CDMP4 (10) in the adopted Local Plan includes a requirement for 'net gain in biodiversity where possible', it could be improved to better reflect the NPPF2021 §174, 179 & 180 and the Environment Act 2021. • The Environment Bill recently became an Act of Parliament and requires a mandatory minimum 10% BNG. However, it is not yet a legal requirement for developments and we would encourage LPA to update relevant policy requirements where possible (SP2). This would test the application of BNG before it becomes mandatory. 	Recommend that SP2 is amended to reflect provision of measureable BNG of at least 10% in policy CDMP2.	The council acknowledge the move towards a mandatory BNG figure established by the Environment Act. This will be addressed in full by the full review of the Wyre Local Plan (currently at Regulation 18 scoping stage) taking into account any up-to-date planning guidance and regulations.	n/a
0021/P/010/GC	Jackie Copley, CPRE	Chapter 4 §4.1.6	N	Not sound - see representation.	CPRE considers 43 hectares of employment land to be too high, given the housing requirement has been reduced to 64% of the previous quantum. Surely it should follow that there should be a commensurate reduction in employment requirement. A reduced amount would enable deletion of sites that are not previously developed in the small rural settlements of Cabus, Churchtown/Kirkland, Hollins Lane, Calder Vale, Dolphinholme (Lower) and the Rural Service Centres of Knott End/Preesall, Great Eccleston, Hambleton, Catterall. The Council should seek to save countryside from development where possible.	n/a	<ul style="list-style-type: none"> • There is significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • There are no site allocations in Cabus, Churchtown/Kirkland, Calder Vale and Dolphinholme(Lower). Allocations in other named settlements referred to have planning permission. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0010/P/002/GC	Joanne Harding - Home Builders Federation	Chapter 4 §4.1.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	§ 4.1.6 proposed to be amended to identify housing requirement of 296dpa and 7,232 dwellings over the Plan period, based on use of standard method for the period 2019/20 and 2031. Not supported, see reasoning in representation 0010/P/001/GC.	n/a	Noted. See response to 0010/P/001/GC	n/a
0011/P/002/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 4 §4.1.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	§ 4.1.6 proposed to be amended to identify housing requirement of 296dpa and 7,232 dwellings over the Plan period, based on use of standard method for the period 2019/20 and 2031. Not supported, see reasoning in representation 0011/P/001/GC.	n/a	Noted. See response to 0011/P/001/GC	n/a

0011/P/002/GC continued	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 4 §4.1.6 (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Additional housing allocations need to be identified to support a higher housing requirement or at least the housing requirement set in the adopted Local Plan.	n/a	<ul style="list-style-type: none"> • The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with significant flexibility in supply, which does not constrain delivery. • Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. • The Partial Review does not make any revisions to the existing housing land supply. • As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
0021/P/007/GC	Jackie Copley, CPRE	Chapter 4 Footnote 16 (new)	n/a	n/a	See representation 0021/P/006/GC about the need for a lower housing requirement.	n/a	Noted. See response to 0021/P/006/GC	n/a
0021/P/008/GC	Jackie Copley, CPRE	Chapter 4 §4.1.11	n/a	n/a	It is acknowledged that Wyre is susceptible to flooding and that the highway network is constrained due to local ground conditions and flooding.	n/a	Noted.	n/a
0021/P/009/GC	Jackie Copley, CPRE	Chapter 4 §4.1.12	n/a	n/a	Objection. There is a good planning case for urban neighbours to take some of Wyre's housing requirement and OAEN through the Duty to Cooperate.	n/a	<ul style="list-style-type: none"> • The Partial Review retains all existing site allocations in the adopted Local Plan that were found sound by the Planning Inspector. • Fylde Council through the adoption of the Fylde Local Plan to 2032 (incorporation Partial Review) has taken Wyre's unmet housing need of 380 dwellings in full. • Wyre Council is able to meet its full employment need within Wyre. 	n/a
0022/P/004/GC	Mark Evans, Fylde Council	Chapter 4 §4.1.12	n/a	n/a	§4.1.12 states <i>The Local Plan delivers in full the housing requirement and OAEN</i> . Fylde's Local Plan (incorporating Partial Review) provides for Wyre's unmet need of 380 dwellings.	Acknowledge in the justification, that as Wyre Council have lowered their number by using the standard method, they no longer require Fylde to assist them in meeting their unmet need.	<ul style="list-style-type: none"> • The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). • Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings • If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. • On this basis there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	n/a

0021/P/013/GC	Jackie Copley, CPRE	Chapter 5 §5.1.1	n/a	n/a	CPRE objects to this wording as there is no reference to the fact that Wyre Council declared a 'Climate emergency' on 11 July 2019.	5.1.1 Local Plan Strategy' chapter, the planning strategy has been influenced by the various constraints in the Borough and the overarching aim to promote sustainable development <u>in accordance with the declared Climate Emergency.</u>	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. Climate change falls outside the scope of this Partial Review. It will be the role of the full review to consider the implications from the council declaring a climate emergency.	n/a
0022/P/005/GC	Mark Evans, Fylde Council	Chapter 5 §5.1.1	n/a	n/a	The partial review should make it clear that if it is adopted, Wyre's unmet need will be met and there will no longer be a requirement for unmet need to be accommodated within Fylde Borough. It is considered that the implementation of the PR is a more sustainable option than continuing with the development strategy in the currently adopted Wyre Local Plan 2011-2031.	n/a	<ul style="list-style-type: none"> ● The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. This representation is in relation to the development strategy, which falls outside the scope of this partial review. ● The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). ● Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings ● If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. ● On this basis there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	n/a
0014/P/001/GC	Sharron Wilkinson - Sport England	Chapter 5 §5.4.3	n/a	n/a	It is welcomed that there are no alterations proposed to the land in Fleetwood (which currently comprises school playing fields) and that the Local Plan continues to show this land as green infrastructure.	n/a	Noted	n/a
0021/P/011/GC	Jackie Copley, CPRE	Chapter 5 §5.4.3	N	Not justified - see representation.	CPRE does not agree there is justification for exceptional circumstances. As stated above, Wyre is planning for too many houses and jobs. There are alternative sites including 49.82 hectares of brownfield land on the brownfield register. The Green Belt designated land is not required for development during the local plan period. CPRE recommends a precautionary approach is followed. As stated above, CPRE's Recycling our land: The state of brownfield report, 2021, evidences there is a lot of available brownfield land in all regions to deliver needed development.	n/a	<ul style="list-style-type: none"> ● This response is in relation to land removed from the Green Belt upon the adoption of the Wyre Local Plan (2011-2031) in 2019. ● This statement is already included within the adopted Local Plan (2011-2031) §5.4.3 and was found sound by the Local Plan Inspector. The land is no longer Green Belt. ● The Green Belt falls outside the scope of this partial review. The partial review does not remove land from the Green Belt. ● Of the 22 brownfield sites currently recorded on the Brownfield Register for the borough, 15 of them contribute to the housing supply figures and three of those sites are allocated for residential development in the adopted Wyre Local Plan. 	n/a

0021/P/012/GC	Jackie Copley, CPRE	Chapter 5 §5.4.4	n/a	n/a	CPRE Objects as exceptional circumstances are not justified.	n/a	<ul style="list-style-type: none"> The response is in relation to exceptional circumstances to justify the release of two sites from the Green Belt. This statement is already included within the adopted Local Plan (2011-2031) that was found sound by the Local Plan Inspector. The Green Belt falls outside the scope of this partial review. 	n/a
0009/P/002/GC	Development Consortium c/o Cushman & Wakefield	Chapter 5 §5.7.2 (new)	n/a	n/a	<ul style="list-style-type: none"> Fully acknowledge that viability appraisals are to be prepared on assumption that they will be made publicly available other than in "exceptional circumstances" in accordance with NPPF and PPG. PPG (Viability) §11 and RICS Professional Statement §5.1 are both clear that commercially sensitive information may need to be kept confidential. Proposed amendment conflict with this requirement. 	Retain wording proposed for deletion. Or, include sufficiently robust and clear drafting in SP6 to provide stakeholders with assurance that confidential information will not be disclosed in the public domain.	<ul style="list-style-type: none"> Disagree. The revision to §5.7.2 is proposed to ensure consistency with the NPPF21 §58 that states "All viability assessments.... should be made publicly available". The removal of the text does not prevent commercially sensitive information being kept confidential in appropriate circumstances. 	n/a
0021/P/015/GC	Jackie Copley, CPRE	Chapter 5 §5.7.2 (new)	n/a	n/a	Object. The text in error invites developers not to contribute to local infrastructure. CPRE welcomed the introduction of NPPF paragraph 58 as it states development applications should be viable in the context of the local plan. Viability assessments are only required as an exception if circumstances justify them. Even then, the weight to attribute the assessment is a matter for the decision taker. Wyre Council should promote policy for all development to come forward with adequate developer contributions, otherwise it will lead to deficiencies and the Council will ultimately bear what should have been the developer's cost.	n/a	<ul style="list-style-type: none"> This response is in relation to instances where contributions to infrastructure and other policy requirements may make a development unviable. This statement is already included within the adopted Local Plan (2011-2031) that was found sound by the Local Plan Inspector. The proposed deletion to §5.7.2 is in relation to confidentiality of commercial information, this proposed deletion is to ensure consistency with NPPF21 §58 which refers to viability evidence being publicly available. This requirement is already included in the NPPF21 and thus accepted. The proposed revision ensures consistency with NPPF21. 	n/a
0005/P/001/GC	NHS Property Services Ltd	Chapter 5 SP1 Development Strategy (new)	n/a	n/a	<ul style="list-style-type: none"> Support policy SP1 in principle, especially where it will see the provision of new and affordable homes for key workers, including NHS Staff. The proposed development strategy will also be an opportunity to provide an effective framework for the delivery of healthcare facilities. The Council should work with NHS commissioners and providers to ensure that adequate healthcare infrastructure are provided to support new residential development. Healthcare facilities are essential infrastructure and should be delivered alongside housing to mitigate the impact of population growth on existing infrastructure and ensure new settlements are sustainable. The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. Should ensure NHS continues to receive a commensurate share of S106 and CIL. 	n/a	<ul style="list-style-type: none"> Support of policy SP1 is noted. The comments submitted by NHS Property Services Ltd on the development strategy and infrastructure provision fall outside the scope of this partial review and will be considered as part of the full review process. 	n/a
0010/P/003/GC	Joanne Harding - Home Builders Federation	Chapter 5 SP1 Development Strategy (new)	No	Not positively prepared; justified or consistency with national policy.	Policy SP1 proposed to be amended to identify the Local Plan will deliver 7,232 dwellings over the Plan period. This is a reduction in the housing requirement from 9,200. Not supported, see reasoning in representation 0010/P/001/GC.	n/a	Noted. See response to 0010/P/001/GC	n/a

				See summary of representation.				
0011/P/003/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 5 SP1 Development Strategy (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation.	Policy SP1 proposed to be amended to identify the Local Plan will deliver 7,232 dwellings over the Plan period but also refer to 43ha of employment land. Object to reducing housing numbers, as set out in representation 0011/P/001/GC.	n/a	Noted. See response to 0011/P/001/GC	n/a
0021/P/014/GC	Jackie Copley, CPRE	Chapter 5 SP4 Countryside Areas (new)	n/a	n/a	Objects. This text is poorly worded and in order not to promote inappropriate unsustainable development it should be amended. CPRE queries whether it is necessary as it duplicates NPPF paragraph 80 (d).	n/a	<ul style="list-style-type: none"> Noted. Policy SP4 is already included within the adopted Local Plan (2011-2031) that was found sound by the Local Plan Inspector. This partial review seeks to include additional text in relation to the subdivision of an existing residential building for residential use. This is proposed to ensure consistency with the NPPF21 §80(d) and provide clarity to how this substantive revision in the NPPF21 would operate in relation to SP4(5). 	n/a
0022/P/006/GC	Mark Evans, Fylde Council	Chapter 5 SP4 Countryside Areas (new)	n/a	n/a	Modification requested.	The amended text of SP4 should say "or would involve the subdivision for of an existing residential building for residential use."	Noted. Minor modification proposed to correct typo.	P/M/03
0003/P/003/GC	Robert Cooke	Chapter 6 CDMP2 Flood Risk and Surface Water Management	n/a	n/a	The Document says that there are 28,500 properties at high risk of flooding, but the plan does not ban further developments; the plan says that new developments should be encouraged to minimise water usage and use sustainable drainage systems to manage run off and reduce flood risk! Would it not be sensible to simply not build there in the first place?	n/a	Noted. The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. Policy CDMP2 Flood Risk and Surface Water Management falls outside the scope of this partial review.	n/a
0021/P/016/GC	Jackie Copley, CPRE	Chapter 6 §6.4.3 (new)	n/a	n/a	Support to achieve good design and place making.	n/a	Noted.	n/a
0014/P/002/GC	Sharron Wilkinson - Sport England	Chapter 6 §6.4.3 (new)	n/a	n/a	Regarding Council commitment to the preparation of design guides and/or codes as part of a supplementary planning document, Sport England in partnership with Public Health England, has produced the Active Design guidance (2015) which we would encourage the Council to use as part of the preparation of these documents. The Active Design guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness and sets out the ten Principles of Active Design. Link to guidance provided.	n/a	Noted.	n/a

0007/P/003/GC	Alexander Hazel - Environment Agency	Chapter 6 CDMP4 Environmental Assets	n/a	n/a	<ul style="list-style-type: none"> • The LPA should consider policy amendment for biodiversity net gain (BNG) provision, where scope allows in regard to NPPF 2021 conformity. • CDMP4 (10) in adopted Local Plan includes a requirement for 'net gain in biodiversity where possible', it could be improved to better reflect the NPPF2021 §174, 179 & 180 and the Environment Act 2021. • The Environment Bill recently became an Act of Parliament and requires a mandatory minimum 10% BNG. However, it is not yet a legal requirement for developments and we would encourage LPA to update relevant policy requirements where possible (CDMP4). This would test the application of BNG before it becomes mandatory. 	Recommend that CDMP2 is amended to include provision of measureable BNG of at least 10%.	The council acknowledge the move towards a mandatory BNG figure established by the Environment Act. This will be addressed in full by the full review of the Wyre Local Plan (currently at Regulation 18 scoping stage) taking into account any up-to-date planning guidance and regulations.	n/a
0021/P/017/GC	Jackie Copley, CPRE	Chapter 7	n/a	n/a	CPRE seeks a reduced housing number and use of up to date population data, which is best practice. See comments under representation 0021/P/006/GC. CPRE comments apply to all relevant text changes in Chapter 7.	n/a	Noted. See response to 0021/P/006/GC	n/a
0021/P/018/GC	Jackie Copley, CPRE	Chapter 7 §7.2.2	n/a	n/a	CPRE supports 10% of housing being delivered on small sites.	n/a	<ul style="list-style-type: none"> • Noted. This comment is not relevant to §7.2.2. • The table following §7.2.2 is proposed to be amended to reflect the housing land provision as at 31 March 2021. The table shows the sources of supply, including 363 dwellings from small sites with planning permission, which has been discounted by 10%. 	n/a
0021/P/019/GC	Jackie Copley, CPRE	Chapter 7 §7.2.3	n/a	n/a	CPRE considers that the windfall amount could be higher at 75 dwellings per annum. There is 49.82 hectares of brownfield land recorded on the register. At a development density of 40 dwellings per hectare this equates to 1,992 houses. Additionally, CPRE research shows nationally 1 in 7 houses can be delivered on land that has come forward in the past 12 months.	Increase windfall allowance to 75 dwellings per annum	<ul style="list-style-type: none"> • Of the 22 brownfield sites currently recorded on the Brownfield Register for the borough, 15 of them contribute to the housing supply figures and three of those sites are allocated for residential development in the adopted Wyre Local Plan. • The council is not proposing to increase its windfall allowance. The Inspector appointed for the Examination in to the now adopted Wyre Local Plan scrutinised the evidence of completions on non allocated housing sites of less than 25 dwellings between 2011 and 2018 which indicated an average of 111 dpa. On that basis he considered in his Post Hearing Advice, there was justification for a windfall allowance within the range of 25-50 dpa. In the report on the Examination of the Wyre Local Plan (01.02.2019) the Inspector concluded there was justification for a contribution of 50dpa from windfalls for the last 10 years of the Plan period (2021-2031). Housing monitoring since 2018 has indicated that there has been no significant change in annual windfall completions on sites of less than 25 dwellings, the average figure between 2011 and 2021 is now 106.5 dpa. Accordingly the council considers that, currently, there is no justification to deviate from the figure recommended by the Inspector during his Examination in to the adopted Local Plan. 	n/a

0022/P/008/GC	Mark Evans, Fylde Council	Chapter 7 §7.2.3	n/a	n/a	Support the doubling of Wyre's windfall allowance from 2024 as the evidence shows that this is justified.	Increase windfall allowance to 100	<ul style="list-style-type: none"> • The council is not proposing to double its windfall allowance. The allowance will take effect from 31 March 2024 so as to avoid double counting with reference to sites with planning permission as at 31 March 2021. • The council is not proposing to increase its windfall allowance. The Inspector appointed for the Examination in to the now adopted Wyre Local Plan scrutinised the evidence of completions on non allocated housing sites of less than 25 dwellings between 2011 and 2018 which indicated an average of 111 dpa. On that basis he considered in his Post Hearing Advice, there was justification for a windfall allowance within the range of 25-50 dpa. In the report on the Examination of the Wyre Local Plan (01.02.2019) the Inspector concluded there was justification for a contribution of 50dpa from windfalls for the last 10 years of the Plan period (2021-2031). Housing monitoring since 2018 has indicated that there has been no significant change in annual windfall completions on sites of less than 25 dwellings, the average figure between 2011 and 2021 is now 106.5 dpa. Accordingly the council considers that, currently, there is no justification to deviate from the figure recommended by the Inspector during his Examination in to the adopted Local Plan. 	n/a
0021/P/020/GC	Jackie Copley, CPRE	Chapter 7 §7.2.4	n/a	n/a	Does Wyre need a buffer given the points made under 0021/P/006/GC about over-performing in terms of completed housing?	n/a	The NPPF 2021 §74-75 requires the supply of deliverable sites to include an appropriate buffer.	n/a
0021/P/021/GC	Jackie Copley, CPRE	Chapter 7 §7.2.6 (new §7.2.5)	n/a	n/a	Restrictive phasing would help promote urban regeneration in advance of countryside loss. The local plan does not really seem to promote sustainable development.	n/a	<ul style="list-style-type: none"> • Noted. • The adopted Local Plan (2011-2031) did not include any phasing that would inhibit or assist any one site coming forward sooner or at a faster rate or in preference to another site. The Local Plan Inspector considered that this approach was sound. • Of the 22 brownfield sites currently recorded on the Brownfield Register for the borough, 15 of them contribute to the housing supply figures and three of those sites are allocated for residential development in the adopted Wyre Local Plan. 	n/a
0003/P/005/GC	Robert Cooke	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	I was pleased to see that the lower housing density of 296dpa has been accepted but disappointed that the higher original number has been kept in reserve.	n/a	<ul style="list-style-type: none"> •Noted. It is assumed the comments are in relation to the proposed housing requirement of 296 dwelling per annum (dpa) (not density). The plan period contains years where the requirement is 460 dpa (2011/12-2018/19) and years where the requirement is 296 dpa (2019/20-2030/31), this is further explained in The Implementation of Policy LPR1 Background Paper §3.8. •The deallocation of site allocations to align with the requirement of 296dpa falls outside the scope of the partial review. The background paper, §6.3 concludes that the residential site allocations are able to meet in full the housing requirement with a significant additional flexibility over the plan period. 	n/a

0005/P/002/GC	NHS Property Services Ltd	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	<ul style="list-style-type: none"> Support policy HP1 in principle, especially where it will see the provision of new and affordable homes for key workers, including NHS Staff. The proposed development strategy will also be an opportunity to provide an effective framework for the delivery of healthcare facilities. The Council should work with NHS commissioners and providers to ensure that adequate healthcare infrastructure are provided to support new residential development. Healthcare facilities are essential infrastructure and should be delivered alongside housing to mitigate the impact of population growth on existing infrastructure and ensure new settlements are sustainable. The NHS, Council and other partners must work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. Should ensure NHS continues to receive a commensurate share of S106 and CIL. 	n/a	Support of policy HP1 is noted. The comments submitted by NHS Property Services Ltd on the development strategy and infrastructure provision fall outside the scope of this partial review and will be considered as part of the full review process.	n/a
0022/P/007/GC	Mark Evans, Fylde Council	Chapter 7 HP1 Housing Land Supply (new)	n/a	n/a	HP1 the figure of 7,232 is made up from 8 years at 460 and 12 years at 296 but consideration should be given as to whether the most sustainable policy would be to add 152 dwellings to meet the shortfall in 2011-19, rather than for these to be provided for outside the Borough. If so, this would add 13 dpa from 2019-31 i.e. 309 dpa overall requirement.	n/a	<ul style="list-style-type: none"> The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. On this basis there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	n/a
0010/P/004/GC	Joanne Harding - Home Builders Federation	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Proposed changes to housing requirement in policy HP1 not supported, see reasoning in representation 0010/P/001/GC.	n/a	Noted. See response to 0010/P/001/GC	n/a
0008/P/001/GC	Andrea Fortune - Kingswood Homes	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	Agree there are no exceptional circumstances that warrant an alternative approach other than standard method to calculate the minimum housing requirement as a starting point.	n/a	Noted	n/a
0016/P/002/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	Do not contest LPR1 background paper §3.2 regarding no circumstances justifying uplift in local housing need figure regarding housing deals, strategic infrastructure improvements or neighbouring planning authority unmet housing need.	n/a	Noted	n/a

0008/P/002/GC	Andrea Fortune - Kingswood Homes	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Standard method is the starting point. National policy sets out scenarios where there is a need to uplift, such as growth strategy, strategic infrastructure improvements or agreeing to take unmet need from neighbouring authorities. National policy does not require the figure to be uplifted, but this approach demonstrates a lack of ambition in delivering sustained growth for the borough which is essential for: tackling housing crisis; facilitate economic growth including Covid-19 recovery; ensuring plan-led approach to bringing residential development forward.	n/a	<ul style="list-style-type: none"> • The council disagrees. The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. • There are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. 	n/a
0008/P/002/GC continued	Andrea Fortune - Kingswood Homes	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Council's employment land needs have not be reduced despite housing need being reduced by 35%.	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0008/P/002/GC continued	Andrea Fortune - Kingswood Homes	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Affordability adjustment (§11 of Planning Practice Guidance) results in uplift of 37 dwellings per annum (dpa) to the standard method figure of 259 dpa. Monitoring year 20/21 has 782 dwelling undersupply, equating to undersupply of 78 dpa for the first 10 years of the plan period (even after reducing annual requirement for the last two years 18/19 and 19/20 to 296dpa. Uplift of 37dpa does not effectively account for the 78dpa and further uplift should be applied.	n/a	<ul style="list-style-type: none"> • The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. • The NPPF and PPG do not require the affordable housing need to be met in full. • It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. • Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. 	n/a

0008/P/002/GC continued	Andrea Fortune - Kingswood Homes	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Since 2015/16, at least 320 homes have been delivered annually in the borough, demonstrating it is achievable and there is market demand. Sales and market demand remain at peak levels in Wyre. Reducing the annual housing need to 296 dpa when more than this can and must be delivered will exacerbate the housing crisis.	n/a	<ul style="list-style-type: none"> • The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. • The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. • It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. • Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	n/a
0011/P/004/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> • Proposed changes to housing requirement in policy HP1 is not supported. Object to reducing housing numbers, see reasoning in representation 0011/P/001/GC. • We have not examined the housing land supply assumptions in terms of commitments and windfalls, we reserve right to do so at a later date. • NPL are of the view that currently there is an insufficient land supply to meet the adopted or emerging housing requirement. Additional sites must be identified. 	n/a	<ul style="list-style-type: none"> • Noted. See response to 0011/P/001/GC. • The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. • Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. • The Partial Review does not make any revisions to the existing housing land supply. • As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
0012/P/001/GC	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary	<ul style="list-style-type: none"> • Page 1 of the consultation document states that following Reg 18, the council intends to gather evidence to underpin the review. This includes reference to an updated Objectively Assessed Need (OAN) to ensure conformity with the latest NPPF, this appear to not have been undertaken. There is no new OAN on the council's website. The 	n/a	<ul style="list-style-type: none"> • The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. 	n/a

				of representation	Implementation of Policy LPR1 background paper does not provide any new baseline evidence on housing need.			
0012/P/001/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> ● NPPF §31-33 makes clear that relevant strategic policies will require review if the position has changed significantly and should be underpinned with relevant up-to-date evidence. Partial Review is not based on evidence of changing circumstances, broad strategy, spatial approach, settlement hierarchy and general approach to employment remains unchanged. Affordable housing not reassessed. ● No updated OAN evidence, no assessment of strategy against NPPG and no review of the implications of following such a change in approach. 	n/a	<ul style="list-style-type: none"> ● The scope of the partial review is clearly and specifically established by policy LPR1. A review of the development strategy, spatial approach, settlement hierarchy, employment and affordable housing falls outside the scope. It will be the role of the full review to consider these matters. ● The council disagrees. The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. 	n/a
0012/P/002/GC	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Housing requirement is significantly reduced. Council has ignored wider national guidance in desire to get a lower housing requirement. Refers to PPG that states "housing need is an unconstrained assessment of the number of homes needed in an area", the assessment of need should be completely unconstrained and not limited to standard method.	n/a	<ul style="list-style-type: none"> ● The council disagrees. The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. ● There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. 	n/a
0012/P/002/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Refers to PPG that states the standard method is a minimum starting point. Some circumstances require increase: growth strategies; planned strategic infrastructure improvements; unmet need from neighbouring authority. List not exhaustive.	n/a	The council considers the NPPG to be instructive on circumstances justifying an uplift in local housing need figure. The Implementation of Policy LPR1 Background Paper §3.1-3.2 has considered if there are circumstances where it may be appropriate to include an uplift. In summary, in Wyre: there are no Housing Deals; no strategic infrastructure improvements likely to increase the homes needed locally; or no requirement to take unmet housing need from any neighbouring authority. Therefore, there are no circumstances in the borough of Wyre where it would be appropriate to include an uplift.	n/a
0012/P/002/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Refers to PPG that states the standard method is a minimum starting point. If previous levels of delivery or previous assessment of need are significantly higher than standard method, this can justify a higher level of need.	n/a	<ul style="list-style-type: none"> ● The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. ● The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. 	n/a

							<ul style="list-style-type: none"> ● It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. ● Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	
0012/P/002/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Refers to PPG that states standard method does not predict changing economic circumstances. NPPF §81 states "significant weight should be place on the need to support economic growth", the standard method should therefore consider whether standard method would support economic growth.	n/a	<ul style="list-style-type: none"> ● The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. ● The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). ● It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. ● There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. ● The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0012/P/002/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Refers to PPG, that states increasing total housing figure to support deliver of affordable homes may need to be considered.	n/a	<ul style="list-style-type: none"> ● The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. ● The NPPF and PPG do not require the affordable housing need to be met in full. ● It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. ● Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. 	n/a

0012/P/002/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Standard method will not deliver the homes the county needs. Department for Levelling Up, Housing & Communities is aware and reviewing position.	n/a	<ul style="list-style-type: none"> Noted The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. 	n/a
0012/P/003/GC	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Standard method is the starting point. In the case of wyre, review of OAN needs a wider assessment in line with representation 0012/P/002/GC. Council has not considered wider methodology in PPG.	n/a	The council disagrees. The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method.	n/a
0012/P/003/GC continued	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	296dpa is significantly different than the adopted Local Plan position of 460dpa. Full and updated OAN should be prepared.	n/a	<ul style="list-style-type: none"> The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector’s report of the Fylde Local Plan Partial Review §26. Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	n/a
0012/P/004/GC	Story Homes c/o Dan Mitchell, Barton willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> Three OAN addendum reports previously undertaken to thoroughly consider needs prior to adoption. Adopted Local Plan strategy emphasises the importance of delivering more housing, referring to §3.2.1 and 3.2.2; vision and objectives note new housing plays a key role in retaining and attracting first-time buyers and young families; §2.4.4 refers to SHMA evidence for smaller properties and affordable housing requirement; §2.9.9 identifies the delivery of affordable housing as a pressing need and deliver through a percentage of new dwellings as affordable; §7.1.1 and 7.1.2 refers to OAN and constraints preventing meeting full OAN; §7.4.2 affordable need rises to 189 after 2022. LPR1 background paper has not considered the wider housing context. 	n/a	<ul style="list-style-type: none"> The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. There are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. 	n/a

							<ul style="list-style-type: none"> •The NPPF and PPG do not require the affordable housing need to be met in full. • It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. • Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. • The scope of the Local Plan Partial Review is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required. 	
0012/P/006/GC	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> • Economic strategy remains unchanged but housing reduced, this will lead to housing/economic imbalance. • Refers to Inspectors report §58-60, minimum OAN of 457 dpa is considered reasonable and constraining job growth and reflects market signals. 479 dpa provides flexibility and takes account of forecasting uncertainties and avoids marked fall in the Borough's working age population. • Delivering less homes will lower the number of economically active people in the Borough to fill anticipated job growth. • Lower housing delivery will exasperate increased job vacancy rates following Covid-19. 	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a
0015/P/002/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted	<ul style="list-style-type: none"> • Various references to the NPPF §60-61 and PPG referred to. • The council need to look at a variety of factors and consider whether there are exceptional circumstances when calculating housing need. Cannot just simply use the standard method when calculating the housing need. Standard method is the starting point and regard to exceptional circumstances; previous housing delivery in the area and recent SHMA are significantly greater. 	n/a	<ul style="list-style-type: none"> • The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. • The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. • It is acknowledged that the objectively assessed housing 	n/a

				housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.			need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. <ul style="list-style-type: none"> Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	
0015/P/002/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.	Inspector's requirement for an early partial review was to ensure the Plan met the full OAN, this should not be used as a mechanism to suppress the adopted housing requirement figure.	n/a	<ul style="list-style-type: none"> The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
0015/P/002/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this	Partial review shows a reduction in housing requirement which will have impact on economic aspirations.	n/a	<ul style="list-style-type: none"> The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted 	n/a

				Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.			Local Plan (the OAEN is based on historic trends). <ul style="list-style-type: none"> It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	
0015/P/002/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.	Partial review shows a reduction in housing requirement which will have impact on provision of affordable homes	n/a	<ul style="list-style-type: none"> The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. The NPPF and PPG do not require the affordable housing need to be met in full. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. The scope of the Local Plan Partial Review is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required. 	n/a

0015/P/002/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.	Partial review shows a reduction in the housing requirement which will have impact on the provision of housing mix.	n/a	<ul style="list-style-type: none"> • The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. • The adopted Local Plan Policy HP2 Housing Mix requires residential developments to provide a mix of housing types and sizes to ensure sustainable communities, to accord with the Strategic Housing Market Assessment (SHMA) and Rural Affordable Housing Needs Survey (RAHNS). • The SHMA Addendum 3 Supplementary Note identifies the housing mix as a proportion. A reduced housing requirement does not impact on the housing mix. • The Partial Review does not make any revisions to the existing housing land supply. 	n/a
0015/P/003/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide	<ul style="list-style-type: none"> • OAN is based on an 'economic growth' scenario, supporting declining working age population and higher affordable housing delivery. The employment land requirement sought to align with the proposed housing requirement. The partial Review should be considered in the context of government ambition to boost housing supply; levelling up economy and growth in the north. • Partial review should have updated the SHMA. 	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. • There is no freestanding obligation in the NPPF to 	n/a

				updated evidence (update to the SHMA) to support this.			significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. <ul style="list-style-type: none"> The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. The NPPF and PPG is clear that the standard method is the starting point. This approach is supported by the Planning Inspector’s report of the Fylde Local Plan Partial Review §26. 	
0015/P/004/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.	Partial review uses Standard Method to calculate Local Housing Need (LHN). LHN is 296, which is a significant reduction over adopted 479. The reduction impacts on the growth for the area set in Vision and Objectives.	n/a	<ul style="list-style-type: none"> The scope of the partial review is clearly and specifically established by policy LPR1. A review of the development strategy, vision and objectives falls outside the scope. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement as the partial review results in an oversupply position. See responses to 0015/P/03/GC & 0015/P/005/GC 	n/a
0015/P/004/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the	Standard Method is the starting point - economic growth, worsening market signals and Wyre specific ageing baseline population and higher affordability ratio (6.29 compared to 5.75 for North West) should be taken into account. Council should support higher levels of housing in sustainable locations. Council should meet its OAN in full to address these matters.	n/a	<ul style="list-style-type: none"> The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the 	n/a

				adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.			Partial Review. <ul style="list-style-type: none"> ● On this basis, there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. ● See responses to 0015/P/03/GC & 0015/P/005/GC 	
0015/P/005/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.	<ul style="list-style-type: none"> ● Adopted housing requirement based on economic growth scenario. No consideration given in this partial review to required employment land in context of reduced housing requirement. ● Employment trends have not been taken into consideration. Reducing the housing requirement will likely encourage inward commuting into borough for employment opportunities and no longer provide sustainable development. ● If progress with 296, need to assess the Employment Land Supply to ensure this reflects provision of housing. 	n/a	<ul style="list-style-type: none"> ● The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. ● The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). ● It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. ● There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. ● The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a

0015/P/007/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not considered justified and based on proportionate evidence.	Expect the council to meet the full OAN to be found sound, it will be necessary to consider transport and highway issues to include highway capacity analysis. This would allow understanding of any additional capacity since the Local plan's adoption and ensure sufficient infrastructure.	n/a	The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. The requirement of Policy LPR1 is to meet in full the housing OAN. It is within this context that a review of transport and highway evidence has been undertaken. As set out in the Implementation of Policy LPR1 Background Paper §4.4, the approach to Policy LPR1 is to firstly review housing need and then to carry out a review of transport and highways constraints for the purpose of ascertaining whether that OAN could be met in Wyre. As the updated housing requirement is a lower figure than the adopted figure of 460dpa and the housing requirement can be met within the existing highway network, a review of the transport and highway evidence is therefore not required for this Partial Review. The three transport highway authorities support this position.	n/a
0016/P/003/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> Do not agree with LPR1 background paper §3.3 regarding average level of housing delivery since 2011 is not significantly greater than the standard method. Based on delivery rates, a higher figure is justified. Should not use delivery since 2011 which has been influenced by lack of up to date local plan in a green belt authority, suppressing housing delivery. Partial review within two years of adoption has not provided a true delivery rate based on housing need in the adopted local plan. Housing trajectory should material increase in build rates in the next five years on sites with consent or committed. Average of 349 since 2011 is not a representative figure. 349 is significantly greater than 296 as it is a 17% increase. The 20% buffer in the NPPF is justified where there has been significant under delivery of housing over the previous three years. We consider that in that context 17% is significant and cannot be simply dismissed by the LPA. 	n/a	<ul style="list-style-type: none"> Housing delivery since 2011 has not been suppressed by the lack of an up to date local plan. The government started to promote its Growth Agenda in 2011 and the council has consistently followed the strategy in accordance with the subsequent reform of the planning system. The publication of a SHMA and addendums has facilitated this process and enabled a better understanding of the local and sub regional housing markets to assist with growth and the delivery of future housing. Housing completions in the early years of the plan period was primarily affected by nationwide economic problems. The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	n/a

0016/P/004/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> Referring to LPR1 background paper §3.4-3.5 regarding adopted Local Plan being prepared before the revised NPPF2021, and referring to PPG regarding local housing need being considered to have changed significantly where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or had been subject to a cap, there is no justification in the NPPF or PPG for an early plan review based on the adopted housing requirement being higher than the requirement generated by the standard method. Reducing the housing requirement from 460 to 296 is not supported in the NPPF or PPG. Partial review not entitled to review the requirement in Policy HP. Also contrary to NPPF objective to boost housing delivery. Referring to PPG, there may be situations where previous levels of housing delivery in an area or recently produced SHMA are significantly greater than the outcome from the standard method. Authorities will need to take this in to account when considering whether it is appropriate to plan for a higher level of need than the standard method. 	n/a	<ul style="list-style-type: none"> The scope of the partial review is clearly and specifically established by Policy LPR1. Criterion 1 requires an update to the Objectively Assessed Housing Need. Due to the changes in terminology within revised guidance, reference to Objectively Assessed Housing Need should be read as housing requirement. The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. The Implementation of Policy LPR1 Background Paper §3.1-3.2 has considered if there are circumstances where it may be appropriate to include an uplift where housing needs are likely to exceed past trends. In summary, in Wyre: there are no Housing Deals; no strategic infrastructure improvements likely to increase the homes needed locally; or no requirement to take unmet housing need from any neighbouring authority. Therefore, there are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. 	n/a
0016/P/005/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Referring to the Inspectors report §58-61 regarding the OAN supporting the council strategy of job growth and responding to scale of identified affordable housing needs, while there is not a specific uplift to the OAN for affordable housing or the economy, the Inspector was clear that both benefits would not be delivered using the full OAN. Standard method does not address these points.	n/a	<ul style="list-style-type: none"> The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. See response 0016/P/005/GC continued. 	n/a

0016/P/005/GC continued	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	Standard method affordability ratio results in only 37 dwelling per year uplift, which is short of meeting affordable housing needs and other factor the Inspector considered, and will have detrimental impact on provision of affordable homes. Affordable housing update is required to understand the local circumstances as to whether the affordability ratio is appropriate.	n/a	<ul style="list-style-type: none"> ● The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. ● The NPPF and PPG do not require the affordable housing need to be met in full. ● It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. ● Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. ● The scope of the Local Plan Partial Review is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required. 	n/a
0016/P/006/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> ● Housing requirement of 296 dwellings per annum is a suppression of actual housing need and conflict with NPPF to boost housing supply. ● Until 296 in partial review is adopted, the figure of 460 must be used for the calculation of the five year supply, and if there is a shortfall, then unallocated sites must be considered. 	n/a	<ul style="list-style-type: none"> ● The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. ● Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. ● The Partial Review does not make any revisions to the existing housing land supply. ● As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. ● There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. ● The five year housing land supply is calculated based upon the housing requirement set within the adopted Local Plan at the time of calculation. 	n/a

0016/P/007/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 7 HP1 Housing Requirement and Supply (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> ● Affordable briefing note provided to consider housing indicators: ● There is an affordable housing shortfall, the Housing register demonstrates high need ● Mean house prices increased 17% from 2011/12-2020/21, median private rent prices includes 10% 2012/12-2020/21 (further indicators on house prices and rental levels provided. ● Numbers on register, worsening affordability indicators and past affordable housing shortfall, leads to strong case for affordable housing delivery. 	n/a	<ul style="list-style-type: none"> ● Noted. ● The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. ● The NPPF and PPG do not require the affordable housing need to be met in full. ● It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. ● Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. ● The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required. 	n/a
0017/P/001/GC	Gladman	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	<ul style="list-style-type: none"> ● It is noted and accepted that the adopted Local Plan did not apply the standard method as its was not part of the national planning policy at the time of drafting the adoption. However, the partial review allows the standard method to be considered by taking into account the amendments to national policy. ● Concerned with councils evidence and justification for amending the housing requirement. ● The 2014-based SNHP forms the 'starting point' in assessing need for housing in Wyre, this suggest a need for 283 dwellings per annum when allowing for vacancy over the plan period (2011-2031), as set in the 3rd SHMA Addendum. Baseline figure similar to 296 calculated through standard method. ● SHMA addendum factors in employment growth, market signals and demographic corrections which increases baseline to establish OAN. To address these matters, minimum OAN 457dpa required, a 11% uplift from upper end longer-term demographic projections and 61% uplift from starting point. No uplift provided to standard method. PPG clear it is starting point, it does not attempt to understand economic circumstances or other demographic behaviours. PPG provides examples of where it is appropriate to uplift. PPG further states it may be appropriate to uplift based upon assessment of need which are significantly greater than outcome of standard method. SHMA 2017 is recent and tested at examination. Should not deviate from evidence base unless compelling evidence to do so. ● Reducing housing target inconsistent with authority's previous economic aspirations. Counteracts Government's aim of increasing house building. 	n/a	<ul style="list-style-type: none"> ● The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. ● There are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. ● The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. ● The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). ● It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. ● There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. ● The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment 	n/a

							<p>strategy.</p> <ul style="list-style-type: none"> ● There is no freestanding obligation in the NPPF to significantly boost housing delivery above the housing requirement; the housing requirement significantly boost housing delivery. 	
0017/P/002/GC	Gladman	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	<p>Average housing completions since 2011 is 349dpa, but this figure is largely due to low completions in the early years. Last five monitoring years, the average completions is 478dpa and higher than adopted Local Plan requirement of 460dpa and significantly more than standard method. Housing delivery has increased over plan period likely due to certainty as the Local Plan progresses and as housing allocations are built out.</p>	n/a	<ul style="list-style-type: none"> ● The Implementation of Policy LPR1 Background Paper §3.3-3.4 has considered if there are circumstances where previous levels of housing delivery in an area, or previous assessment of need, such as a recently produced SHMA are significantly greater than the outcome from the standard method. ● The council considers it appropriate to consider previous housing delivery since the start of the Plan period in 2011 (10 year period). This is more representative of long term trends. There is no support in the PPG for considering different periods of housing delivery; the most appropriate is the Plan period. ● It is acknowledged that the objectively assessed housing need in the adopted Local Plan is higher than standard method, this is however based on assessments which were produced prior to the introduction of the new approach and subsequent revisions to the national planning policy and guidance. This approach is supported by the Planning Inspector's report of the Fylde Local Plan Partial Review §26. ● Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. 	n/a

0018/P/003/GC	Marcus Hudson, Lancashire County Council	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	<ul style="list-style-type: none"> • The proposal to reduce the housing figure from 460 to 296 for the period 2019/21-2018/2031 needs to be understood in the context of the future growth aspirations and investment priorities for the borough. • Evidence base informing Independent Economic Review for Lancashire and accompanying Environment Commission work should form part of the underpinning evidence for amending the figures. As key findings from the work are considered by Lancashire Leaders and future priorities agreed, the policy direction of Local Plans should support these as appropriate. Investment and funding opportunities that are identified in response to this, and to the forthcoming Levelling Up White Paper will also need to align with and be supported by a strong spatial policy framework. 	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. • It will be the role of the Full Review to consider the emerging Lancashire Independent Economic Review evidence and how the Local Plan can respond. 	n/a
0020/P/001/GC	Matthew Symons, Hollins Strategic Land	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	<ul style="list-style-type: none"> • Council is seeking to reduce its housing requirement, which was recently done in neighbouring Fylde. • PPG confirms the standard method identifies a minimum annual housing need figure and does not produce a housing requirement figure. Refers to Local Plan Inspectors Report §59-61 that sets out why OAN was sought by the council: job growth; affordable housing needs; suppressed younger household formation; modest worsening market signals; fall in housing supply on population projections. These factors not considered when council updated OAN via the Standard Method. • Must provide flexibility in the supply. • Must take the opportunity to provide greater certainty on the LP strategy. 	n/a	<ul style="list-style-type: none"> • The NPPF 21 §61 requires the minimum number of homes needed to be informed using the standard method. As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. There are no circumstances in the borough of Wyre where it would be appropriate to include an uplift. • The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. • The NPPF and PPG do not require the affordable housing need to be met in full. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. • The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. A review of the development strategy falls outside the scope. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. • The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement 	n/a

							of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement as the partial review results in significant flexibility in supply.	
0020/P/001/GC continued	Matthew Symons, Hollins Strategic Land	Chapter 7 HP1 Housing Requirement and Supply (new)	n/a	n/a	Employment land requirement retained but housing requirement significantly reduced. No evidence provided that reduced housing will not prevent employment being delivered or would not result in fall in working age population. Potentially, could deliver employment requirement but rely on workforce travelling from beyond the borough boundaries, which is not sustainable development.	n/a	<ul style="list-style-type: none"> • The affordability adjustment within the standard method calculation takes account of people moving into an area for economic reasons. The standard method only requires an uplift adjustment where there are specific growth strategies, which Wyre does not have. • The latest Employment Monitoring Report (20/21) demonstrates the continued low uptake of employment land in Wyre, which is below that projected in the adopted Local Plan (the OAEN is based on historic trends). • It is also apparent that the Hillhouse Technology Enterprise Zone (EZ) has underperformed over the last five years with projected jobs not materialising, jobs losses following the closure of Vinnolit facility and due to the effects of Covid-19. • There is therefore significant economic uncertainty at present. It will be the role of the Local Plan Full Review to consider the economic strategy and the wider consequences of changing working patterns. • The Partial Review retains all existing residential and employment site allocations in the adopted Local Plan that were found sound by the Planning Inspector. The proposed housing requirement will not lead to an imbalance between the housing strategy and employment strategy. 	n/a

0010/P/005/GC	Joanne Harding - Home Builders Federation	Chapter 7 HP3 Affordable Housing (new)	n/a	n/a	Proposed amendments to HP3 that refers to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. Policy would benefit from further information within the justification text as to how this will be applied in practice.	n/a	<ul style="list-style-type: none"> • The PPG provides guidance on First Homes and how it is to be applied. The response does not specify what further guidance on application is required. • In accordance with the PPG First Homes (paragraph 004 Reference ID: 70-004-20210524), it is the role of the plan-making process and this is for the full review, to consider through undertaking a housing need assessment to take account of the need for a range of housing types and tenure, including various affordable housing tenures such as First Homes. If, because of the plan-making process, it is determined that alternative criteria in addition to the national criteria set out is required, guidance on how First Homes will be applied in practice within Wyre will be prepared. 	n/a
0011/P/005/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 7 HP3 Affordable Housing (new)	n/a	n/a	<ul style="list-style-type: none"> • Proposed amendments to HP3 that refers to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. Policy would benefit from further information within the justification text as to how this will be applied in practice. • Reducing the housing numbers would significantly compromise the delivery of First Homes in line with policy HP4 	n/a	<ul style="list-style-type: none"> • The PPG provides guidance on First Homes and how it is to be applied. The response does not specify what further guidance on application is required. • In accordance with the PPG First Homes (paragraph 004 Reference ID: 70-004-20210524), it is the role of the plan-making process and this is for the full review, to consider through undertaking a housing need assessment to take account of the need for a range of housing types and tenure, including various affordable housing tenures such as First Homes. If, because of the plan-making process, it is determined that alternative criteria in addition to the national criteria set out is required, guidance on how First Homes will be applied in practice within Wyre will be prepared. • The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. • The Partial Review does not make any revisions to the existing housing land supply. • As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a

0021/P/022/GC	Jackie Copley, CPRE	Chapter 7 HP3 Affordable Housing (new)	n/a	n/a	<ul style="list-style-type: none"> ● Broadly supportive as housing should be delivered in accordance with the Strategic Housing Market Assessment. ● CPRE disagrees that 'First Homes' are in perpetuity 'genuinely' affordable homes as 80% of market value is still out of reach of most people. We recommend Wyre does not accept the Government's definition, due to this reason, as it will cause further difficulties to the worse off households. 	n/a	<ul style="list-style-type: none"> ● Noted. ● HP3(4) is proposed to be amended to ensure consistency with the updated Planning Practice Guidance in relation to First Homes. ● The PPG provides guidance on First Homes and how it is to be applied. In accordance with the PPG First Homes (paragraph 004 Reference ID: 70-004-20210524), it is the role of the plan-making process and this is for the full review, to consider through undertaking a housing need assessment to take account of the need for a range of housing types and tenure, including various affordable housing tenures such as First Homes. If, because of the plan-making process, it is determined that alternative criteria in addition to the national criteria set out is required, guidance on how First Homes will be applied in practice within Wyre will be prepared. 	n/a
0012/P/005/GC	Story Homes c/o Dan Mitchell, Barton willmore LLP	Chapter 7 HP3 Affordable Housing (new)	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> ● Delivery of affordable housing is a key priority for the council. The council is under delivering against the adopted Local Plan targets. Over the plan period, have delivered 688 units against need of 1,615. ● Reducing the housing requirement to 296 dpa for remaining plan period will lead to a reduction in the delivery of affordable homes, contrary to the spatial strategy. 	n/a	<ul style="list-style-type: none"> ● The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. ● The NPPF and PPG do not require the affordable housing need to be met in full. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. ● Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. 	n/a
0015/P/006/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP3 Affordable Housing (new)	No	Partial Review is not considered justified and based on proportionate evidence.	<ul style="list-style-type: none"> ● No new evidence provided to support significantly reduced housing figure, no assessment of missed opportunities from lower housing figure, such as reduced construction employment, less local investment, affordable housing supply, council tax etc. ● Requirement to produce LHN assessment to inform new housing requirement has not been undertaken. 	n/a	<ul style="list-style-type: none"> ● The NPPF 21 §61 requires that to "determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. ● As set out in Implementation of Policy LPR1 Background Paper §3.1-3.4, within the borough, there are no circumstances where it may be appropriate to include an uplift; and the levels of housing delivery is not significantly greater than the outcome from standard method. ● Over the Plan period, the Partial Review housing delivery is projected at 9,423 dwellings, exceeding the housing requirement of 7,232 by 2,191 dwellings. This includes significant additional flexibility over the Plan period and does not prejudice the delivery of the existing site allocations in the adopted Local Plan, which remain unchanged. ● See response 0015/P/006/GC continued 	n/a

0015/P/006/GC continued	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 7 HP3 Affordable Housing (new)	No	Partial Review is not considered justified and based on proportionate evidence.	<ul style="list-style-type: none"> • No evidence considering impact on the delivery of affordable housing, first time buyers, key workers and family homes. • Affordable housing requirement in SHMA 2016 is considerable at 134 in first five years and 189 beyond. • Reducing the housing requirement impacts on affordable housing needs in the long term due to an increase in housing prices due to shortage of supply. 	n/a	<ul style="list-style-type: none"> • The proposed housing requirement in the Partial Review does not impact upon the delivery of affordable housing from that found sound in the adopted Local Plan. • The NPPF and PPG do not require the affordable housing need to be met in full. It is acknowledged that the total affordable housing need will not be met by the housing requirement in the adopted Local Plan or that proposed by the Partial Review. • Affordability is baked into the standard method via the affordability ratio adjustment. This differs from the approach to the OAHN in the adopted Local Plan that included consideration of affordability. That assessment was produced prior to the introduction of the new standard method approach, and subsequent revisions to national planning policy and guidance. • The scope of the Local Plan Partial Review (LPPR) is narrow, with the terms clearly and specifically established by Policy LPR1. The consideration of affordability is baked into the standard method via the affordability ratio adjustment. Therefore, new affordable housing evidence to support the housing requirement is not required. 	n/a
0021/P/023/GC	Jackie Copley, CPRE	Chapter 7 HP4 Exception Sites (new)	n/a	n/a	CPRE Supports the use of Rural Exception Sites for 'Genuinely' Affordable Homes only. 'Genuinely' affordable housing should be achieved on-site, otherwise a lack of affordable homes in rural places will continue.	n/a	Noted.	n/a
0010/P/006/GC	Joanne Harding - Home Builders Federation	Chapter 7 HP4 Exception Sites (new)	n/a	n/a	Proposed amendments to HP4 that refers to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. Policy would benefit from further information within the justification text as to how this will be applied in practice.	n/a	<ul style="list-style-type: none"> • The PPG provides guidance on First Homes and how it is to be applied. The response does not specify what further guidance on application is required. • In accordance with the PPG First Homes (paragraph 004 Reference ID: 70-004-20210524), it is the role of the plan-making process and this is for the full review, to consider through undertaking a housing need assessment to take account of the need for a range of housing types and tenure, including various affordable housing tenures such as First Homes. If, because of the plan-making process, it is determined that alternative criteria in addition to the national criteria set out is required, guidance on how First Homes will be applied in practice within Wyre will be prepared. 	n/a

0011/P/006/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 7 HP4 Rural Exceptions (new)	n/a	n/a	<ul style="list-style-type: none"> Proposed amendments to HP4 that refers to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. Policy would benefit from further information within the justification text as to how this will be applied in practice. Reduction in housing numbers would significantly compromise the delivery of First Homes in line with policy HP4. 	n/a	<ul style="list-style-type: none"> The PPG provides guidance on First Homes and how it is to be applied. The response does not specify what further guidance on application is required. In accordance with the PPG First Homes (paragraph 004 Reference ID: 70-004-20210524), it is the role of the plan-making process and this is for the full review, to consider through undertaking a housing need assessment to take account of the need for a range of housing types and tenure, including various affordable housing tenures such as First Homes. If, because of the plan-making process, it is determined that alternative criteria in addition to the national criteria set out is required, guidance on how First Homes will be applied in practice within Wyre will be prepared. The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
0021/P/024/GC	Jackie Copley, CPRE	Chapter 8 EP5 Main Town Centre Uses (new)	n/a	n/a	More brownfield land should be brought back into use to save land in the countryside.	n/a	Noted. The Partial Review retains all existing site allocations in the adopted Local Plan that were found sound by the Planning Inspector. Of the 22 brownfield sites currently recorded on the Brownfield Register for the borough, 15 of them contribute to the housing supply figures and three of those sites are allocated for residential development in the adopted Wyre Local Plan.	n/a
0021/P/025/GC	Jackie Copley, CPRE	Chapter 9 §9.2.1	n/a	n/a	Support. CPRE welcomes that Wyre now can demonstrate a sufficient amount of deliverable land to meet the full housing requirement.	n/a	Noted.	n/a
0022/P/009/GC	Mark Evans, Fylde Council	Chapter 9 §9.2.1	n/a	n/a	§9.2.1 is amended to read "The Local Plan ensures that sufficient deliverable land is available for a minimum 7,232 net dwellings to meet the full housing requirement for the period 2011-2031."	Acknowledge in the justification, that as Wyre Council have lowered their number by using the standard method, they no longer require Fylde to assist them in meeting their unmet need.	<ul style="list-style-type: none"> The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. 	n/a

							<ul style="list-style-type: none"> ● On this basis, there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	
0022/P/010/GC	Mark Evans, Fylde Council	Chapter 9 §9.2.1	n/a	n/a	Reference to need has been deleted from this paragraph. The full need for the period 2011-2019 has not been met by the Wyre Partial Review.	n/a	<ul style="list-style-type: none"> ● The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). ● Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings. ● If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review.. ● On this basis, there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. 	n/a
0008/P/003/GC	Andrea Fortune - Kingswood Homes	Chapter 9 Site Allocations	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<p>Review of existing allocation has found 608 homes are expected to be delivered on allocated sites which now do not appear to be coming forward for residential development or have constraints which cannot be overcome. Revised yield proposed for:</p> <ul style="list-style-type: none"> ● SA1/1 West of Broadway, Fleetwood; expected yield 25; observations: Adactus Housing Association submitted a full application in 2021 for 44 dwellings which was refused at Planning Committee in October 2021 for the proposed increase in number of homes above the site capacity resulting in design and flooding issues, and also the lack of on-site green infrastructure including an LAP. The applicant appealed the decision in December 2021. However, given the Council have refused this application highlighting issues of viability, design, flood risk, green infrastructure provision and viability, this yield is to be removed from the supply; revised yield: 0 ● SA3/1 Fleetwood Dock and Marina; expected yield: 120; observations: Planning permission is not in place and there is no sign that the allocation will deliver its estimated yield of residential development. Despite this, commercial development is being delivered on the site following recent application 20/01087/FULMAJ for a replacement food processing park. Therefore it is assumed the allocation will not deliver residential development; revised yield: 0. 	See summary of representation regarding housing supply.	<p>Delivery figures in the HIS are based on stakeholder engagement which was undertaken in 2017, 2019, 2020 as well as in Spring/Summer 2021. The responses received fed directly in to the housing trajectory. The council considers direct engagement with those who have the most ability to impact upon the delivery of their sites provides robust and realistic justification for the delivery figures included in the HIS. Consequently, the council is confident that its delivery assumptions are realistic and there is no justification to support the deduction of 608 units from the housing land supply over the plan period. In response to Kingswood Homes revised housing land supply:</p> <ul style="list-style-type: none"> ● SA1/1 West of Broadway, Fleetwood. A Registered Provider recently purchased this site and responded to the 2021 Stakeholder Survey clearly indicating their intention to develop the land with the assistance of grant funding. In October 2021 the full planning application for 44 dwellings on the site was refused permission and an appeal is currently pending. It is clear from the submission of an appeal that the landowners are invested in developing the site and the two reasons for refusal of the detailed planning application are matters which can be resolved by the submission of an alternative scheme. Therefore there is no conclusive evidence to justify the suggestion that this allocated housing site with its original capacity figure of 25 units will not be delivered in the remaining 10 years of the 	n/a

							<p>plan period.</p> <ul style="list-style-type: none"> ●SA3/1 Fleetwood Dock and Marina. The council is working closely with the landowners of this site to facilitate the development of the industrial/ commercial and residential elements and stakeholder responses have been received in previous years. The landowners have been successful in obtaining grant funding and development has commenced on site for new food processing units and enabling infrastructure (for residential development) which will allow for the relocation of existing operators on the site. This will then release the land which will be used for future housing. As the enabling development has commenced it is clear that this site will deliver housing in accordance with the housing trajectory and within the plan period. Accordingly there is no justification to remove 120 units from the land supply figures. 	
0008/P/003/GC continued	Andrea Fortune - Kingswood Homes	Chapter 9 Site Allocations	No	<p>Not positively prepared; justified or consistency with national policy. See summary of representation</p>	<ul style="list-style-type: none"> ● SA1/14 West of Cockerham Road; expected yield: 260; observations: Taylor Wimpey submitted a full application in 2020 for 88 dwellings on part of the allocation, however LCC objected to the site coming forward in isolation from the other parcels within the allocation as this may allow for opportunities of vehicle connections to be missed and sustainable transport connections. The area subject to this application is an isolated and irregular shape that is poorly connected to the existing settlement which is not comprehensive planning. Kingswood Homes have reviewed the adjacent landownership parcels ((LAN214501 and LA618949), LA928331, and LA776045). The Title Registers attached to each of these ownerships do not show that a developer or promoter has a position on the site, whilst there are also a number of restrictive covenants, legal easements and rights of access across some of these parcels. Therefore there is not sufficient evidence available to suggest that this allocation will still come forward and it should be deallocated. revised yield: 0 ● SA1/6 Land south of Blackpool Road; expected yield 300; observations: Full permission was granted (along with outline consent for a primary school) for 202 dwellings in July 2021 across the majority of the site. The southern part of the site was subject to an outline application submitted by Baxter Homes in 2017 for 48 dwellings and was heard at Planning Committee in August 2021 and recommended for approval. Blackpool Council submitted an outline application for 330 dwellings on the undeveloped land to the west of the allocation but this was refused due to the impacts upon the highway network; Revised yield: 250. 	n/a	<ul style="list-style-type: none"> ●SA1/14 West of Cockerham Road, Garstang Stakeholder responses have been received in previous years regarding this site and in 2021 responses were received from all but one landowner. The responses all clearly indicated that work is still progressing to prepare a masterplan to ensure a comprehensive development and assist with resolving issues on site. There is clear commitment to developing the site from all the landowners/developer, which includes a national house builder and a pending planning application. Consequently there is no justification for deallocation of the site and the removal of 260 units. ● SA1/6 Land south of Blackpool Road, Kingswood Homes do not provide any specific justification for the removal of 50 units from the land supply. The council has made the assumption it relates to a site capacity figure based on planning permission granted to one developer for 202 dwellings and a committee resolution to approve a scheme for up to 48 dwellings by a different developer. There is however a further full planning application pending for 42 dwellings on part of the remaining allocated land by a third developer and a parcel of land which has not yet been the subject of a planning application. The Blackpool Council site referred to is not included within the SA1/6 housing allocation. Stakeholder responses have been received from some, or all, of the three developers involved with the site, in 2019, 2020 and 2021. The responses indicate their commitment to developing the site. A response was also received in 2021 from one of the landowners of a small area of remaining land, indicating their commitment to its future development. The "Land south of Blackpool Road Masterplan", to ensure comprehensive development of the site, has been approved and construction has commenced on the 202 dwelling scheme. On that basis the council is confident for full delivery of 300 units within the plan period and considers there is no justification to remove 50 units from the land supply. 	n/a

0008/P/003/GC continued	Andrea Fortune - Kingswood Homes	Chapter 9 Site Allocations	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> SA1/3 Land between Fleetwood Road North and Pheasant Wood, Thornton; expected yield 153; observations: Although the site is owned by Wyre Borough Council, no application has been submitted for residential development despite being allocated for residential development since the adoption of the Local Plan, therefore this site should not be relied upon to deliver housing in the remaining plan period as it is clear there are technical constraints. The 2017 SHLAA highlights a number of these issues such as an agricultural tenancy, proximity to the Fleetwood Farm Fields BHS and the presence of a former tip on the northern quarry. Revised yield:0 	n/a	<ul style="list-style-type: none"> SA1/3 Land between Fleetwood Road North and Pheasant Wood, Thornton. Wyre Council own this land and has a clear objective to dispose of the site, which is supported by Cabinet approval for the land to be appropriated for planning purposes. It is not the intention of the council to submit a planning application on the site, it will be left for the future landowner / developer to undertake that task. The council can confidently state it is working towards disposing of the land with the expectation it will be developed before the end of the plan period. It is acknowledged that there are some development constraints, as with most land, but nothing that would prevent its development before 2031. Accordingly there is no justification to delete 153 units from the housing supply figures. 	n/a
0011/P/007/GC	NPL Group (UK) Ltd c/o Phil Robinson, Pegasus Group	Chapter 9 Site Allocations	n/a	n/a	Insufficient site allocations to meet Wyre's emerging housing requirement.	n/a	<ul style="list-style-type: none"> The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a

0012/P/007/GC	Story Homes c/o Dan Mitchell, Barton Willmore LLP	Chapter 9 Site Allocations	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> Referring the LPR1 background paper and high level assessment of the delivery of existing allocated sites, with the council concluding that due to the lower housing requirement, the council has enough land to meet identified needs. It is noted a number of allocations have no permission and there is no information on delivery of completions for each site. This provides a incomplete picture. Number of consents are beyond the standard 3 year time period and there is no information on completions on each site, housing trajectory could be overestimating likely delivery. Local Plan not currently delivering market and affordable housing needs. Reducing growth will exasperate this problem. Council should review housing strategy and make new allocations. (council accepts this is not normally recorded until a whole site is finished). 	n/a	Appendix 6 to The Implementation of Policy LPR1 Background Paper was included to understand if the site allocations would be likely to continue to deliver the number of units envisaged when the Local Plan was prepared, by considering the total capacity figures of approved and pending applications for each site. Accordingly the final capacity of each site can only be determined once the site is fully complete as there is always the potential for developers to submit further planning applications to increase/decrease housing numbers at any point in time prior to and during construction. A number of the consents listed are beyond the three year time limit but they either relate to sites which are already under construction or to provide a better overview of the planning history of the site. The additional evidence contained in the Housing Implementation Strategy (HIS) Partial Review Report (November 2021), which was also included in the Regulation 19 consultation, sets out more detailed information on all housing sites with extant permission including completion figures and estimated delivery over the plan period. Delivery figures in the HIS are based on stakeholder engagement which was undertaken in 2017, 2019, 2020 as well as in Spring/Summer 2021. The responses received fed directly in to the housing trajectory. With reference to the sites allocated for housing in the Local Plan, stakeholder responses were received relating to 23 sites, no response was received on five sites and three site stakeholders were not contacted as the land was either fully developed or over half complete. Having had direct engagement with those who have the most ability to impact upon the delivery of their sites, the council is confident that the delivery figures included in the HIS are robust and realistic.	n/a
0015/P/001/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 9 Site Allocations	No	Not considered to be justified, it is not positively prepared or consistent with national policy. As such, this Partial Review needs to re-consider meeting the adopted housing requirement in full taking into consideration current and future demographic trends, market	<ul style="list-style-type: none"> Support site allocation SA1/14. Taylor Wimpey submitted planning application and currently pending. No technical or environmental constraints preventing delivery. Will significantly contribute to meeting the boroughs market and affordable housing. Wyre not currently meeting full OAN, imperative that adequate support is provided to enable the delivery of sustainable and viable allocation. 	n/a	<ul style="list-style-type: none"> Noted. There is a planning application pending for 88 dwellings on part of Site Allocation SA1/14 - West of Cockerham Road, Garstang which is allocated for a total of 260 dwelling. The key development consideration (1) requires the site "..... to be brought forward in line with a masterplan to be produced covering the whole allocation....". The councils role is to facilitate the process. A landowner group has been established and work on preparing a draft masterplan is underway. The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing 	n/a

				signals and Wyre specific constraints; and provide updated evidence (update to the SHMA) to support this.			delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement.	
0015/P/008/GC	Taylor Wimpey co Tamara Ettenfield, Lichfields	Chapter 9 Site Allocations	No	n/a	<ul style="list-style-type: none"> ● Acknowledge that revisions to allocations are not considered within the scope of the Partial Review. ● Expect the council to review strategies for increasing allocations to meet its housing requirement. ● Review potential spatial distribution strategies. ● Expect council to fully support existing allocations and encourage them to be brought forward within Plan period. 	n/a	<ul style="list-style-type: none"> ● Noted. ● The scope of the partial review is clearly and specifically established by policy LPR1. A review of the development strategy falls outside the scope. ● The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant flexibility in supply over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. ● The council supports the delivery of the Local Plan allocations where they accord with the Local Plan. 	n/a

0020/P/002/GC	Matthew Symons, Hollins Strategic Land	Chapter 9 Site Allocations	n/a	n/a	<p>It is acknowledged that the Council does not intend to de-allocate housing sites via the PR and that it states only two of its allocations do not have planning permissions in place. That does not tell the entire story with some allocations having large portions that do not have permissions in place. Moreover, this does not provide sufficient reasoning to warrant such a significant reduction in the housing requirement. The allocations may not deliver as intended, even those with planning permission. Indeed, they have been slow to deliver to date.</p>	n/a	<ul style="list-style-type: none"> ● Appendix 6 to The Implementation of Policy LPR1 Background Paper was included to understand if the site allocations would be likely to continue to deliver the number of units envisaged when the Local Plan was prepared, by considering the total capacity figures of approved and pending applications for each site. Even though the final capacity of each site can only be determined once the site is fully complete the sense check undertaken clearly indicates that, currently, the allocated housing sites are expected to deliver at least the required housing numbers. Consideration of pending planning applications is also relevant in this process as it indicates interest in the land and potential future delivery both of which are important factors in preparing the housing trajectory. Whilst the appendix also shows that only two allocations have not been the subject of a planning application yet, the majority of the remaining sites are wholly or mostly covered by either approved or pending planning applications. Mid way in to the plan period this is not considered to be an issue. In terms of delivery, sites are coming forward and delivering with different timelines and rates depending on the size, location and development issues on each individual site, this is not unusual. The range allows for a spread of completions over the whole plan period. As at January 2022 of the 31 housing allocations, three are fully complete, 17 are under construction of which 12 are between approximately 50% complete and fully complete, and 11 sites have yet to start. Seven sites commenced construction within one year of the Publication Draft Wyre Local Plan being published (September 2017). This does not appear to indicate slow delivery. ● The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
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0008/P/004/GC	Andrea Fortune - Kingswood Homes	Chapter 9 Site Allocations Omission Site	n/a	n/a	<p>Omission site: Land West of Lancaster Road, Forton</p> <ul style="list-style-type: none"> • An outline planning application (ref: 18/00418/OULMAJ) was submitted in April 2018 for up to 147 dwellings after the landowner encouraged to do so by the Council following its allocation as part of the Forton extension allocation for housing and employment development within the Draft Local Plan submitted to the Secretary of State. Following the submission of the outline application, the Inspector held hearing sessions on the Emerging Local Plan and published a post Hearing Advice note in July 2018. The note advised the Council to remove this site from the Forton extension allocation and include the site within the Area of Separation designation as part of the proposed modifications. The Council then consulted on the proposed modifications which included these recommendations in September 2018. • Application then refused on 4 January 2019. • Wyre Local Plan 2011-2031 then adopted 28 February 2019 with site designates as Open Countryside and in Strategic Area of Separation • Site should be allocated: suitable, available, achievable. Detailed commentary provided to justify. 	Inclusion of omission site: Land West of Lancaster Road, Forton.	<ul style="list-style-type: none"> • Noted. The Partial Review retains all existing site allocations in the adopted Local Plan that were found sound by the Planning Inspector. • This omission site was considered by the Planning Inspector for the Local Plan examination. In the Report on the Examination of the Wyre Local Plan, the Planning Inspector concluded at §183-190, that the parcels to the south and east of Sunnybank Nurseries should be deleted. • The housing requirement as part of this partial review is not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement. 	n/a
0016/P/001/GC	Wainhomes co Stephen Harris, Emery Planning	Chapter 10 LPR1 Wyre Local Plan Review	No	Not positively prepared; justified or consistency with national policy. See summary of representation	<ul style="list-style-type: none"> • Referring to the Inspectors report §68-73 & 78 that further local and strategic highway network work required to meet full OAN. The partial review has the objective of meeting the OAN within the Plan period. • Purpose of partial review is not to prepare an alternative lower housing requirement which is not an OAN i.e. standard method proposed by this Partial Review. • Partial review should be meeting OAN. Additional sites should be allocated as required by LPR1 criterion 3. 	n/a	<ul style="list-style-type: none"> • The scope of the Local Plan Partial Review is narrow, with the terms clearly and specifically established by Policy LPR1. The requirement of Policy LPR1 is to meet in full the housing OAN. It is within this context that a review of transport and highway evidence has been undertaken. As set out in the Implementation of Policy LPR1 Background Paper §4.4, the approach to Policy LPR1 is to firstly review housing need and then to carry out a review of transport and highways constraints for the purpose of ascertaining whether that OAN could be met in Wyre. As the updated housing requirement is a lower figure than the adopted figure of 460dpa and the housing requirement can be met within the existing highway network, a review of the transport and highway evidence is therefore not required for this Partial Review. The three transport highway authorities support this position. • The scope of the partial review is clearly and specifically established by Policy LPR1. Criterion 1 requires an update to the OAHN. Due to the changes in terminology within revised guidance, reference to OAHN should be read as housing requirement. The NPPF 21 §61 requires that to “determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance”. The Implementation of Policy LPR1 Background Paper has undertaken the local housing need assessment using the standard method. • The housing requirement as part of this partial review is 	n/a

							not the same as delivery. The housing requirement does not change delivery as part of this partial review. The partial review results in a position with a significant flexibility in supply, which does not constrain delivery. Over the Plan period, there is a housing requirement of 7,232. This is based upon 460 net additional dpa (Adopted Local Plan) between 2011-2019 and 296 net additional dpa (Standard Method) between 2019-2031. The Partial Review does not make any revisions to the existing housing land supply. As set out in the Implementation of Policy LPR1 Background Paper §6.1, there is a projected housing delivery of 9,423 dwellings over the Plan period, exceeding the housing requirement of 7,232 by 2,191 dwellings. This demonstrates there is sufficient supply to meet the housing requirement, with a significant additional flexibility over the Plan period. Therefore, there is no need for additional allocations to meet the identified housing requirement.	
0019/P/003/GC	Rodger Brook	Appendix A (new)	n/a	n/a	I have noted the Revisions to the text and the list of superseded polices on page 56.	The word “superseded” in column two requires correction.	Noted. Minor modification proposed to correct typo.	P/M/04
0022/P/011/GC	Mark Evans, Fylde Council	Appendix A (new)	n/a	n/a	Appendix A has been added to indicate policies superseded by the Partial Review, as was required as a main modification by Fylde’s Partial Review Inspector; however, policy LPR1, which is included within the list of such policies in the introductory section of the Schedule of Revisions document, has been omitted from the table in Appendix A. It is suggested that it should be included and indicated as deleted, no longer required, perhaps with some brief explanation e.g. has been addressed through the Partial Review of the Wyre Local Plan.	Add LPR1 into Appendix A and indicate it is deleted.	Noted. Minor modification proposed to correct typo.	P/M/04

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT 2021

Table 7 - Summary of Representations on the Sustainability Appraisal (D)

Unique Ref	Name	SA Ref	SA - Summary of Representation	Response
0001/P/002/D	Warren Hilton - National Highways	n/a	No comment.	Noted.
0007/P/005/D	Alexander Hazel - Environment Agency	n/a	Satisfied that the SA has been updated to take account of our previous comments, which includes referencing measurable Biodiversity Net Gain (BNG).	Noted.
0018/P/001/D	Marcus Hudson, Lancashire County Council	n/a	Historic Environment Record Team would normally expect the SA to mention: <ul style="list-style-type: none"> • Historic Environment Record (HER) being the source for information on both designated and non-designated heritage assets (as most archaeological sites fall within this designation). • That developers will therefore be expected to consult the HER when compiling assessments of the impact of their proposals on the historic environment. • That copies of all reports (whether they cover built structures or below-ground remains) need to be submitted to the HER. 	<ul style="list-style-type: none"> • Noted. • The sustainability baseline and key issues section within the SA report includes a Cultural Heritage sub-section (page 166). This provides high level baseline data with reference to both designated and non-designated heritage assets. There is no requirement to include reference to all sources of data and it is not the role of the SA to require developers to consult HER or submit reports to the HER when compiling assessments.
0022/P/012/D	Mark Evans, Fylde Council	SA Reasonable Alternative Option	The Sustainability Appraisal accompanying the Partial Review does not make any assessment of the reduction of the housing number as a reasonable alternative and the relative sustainability of lowering the housing number. It will be more sustainable to meet Wyre's housing needs in Wyre, and it is considered that this should have been assessed in the sustainability appraisal.	<ul style="list-style-type: none"> • This response appears to have confused two housing matters: (1) the unmet need in the adopted Local Plan (380 dwellings over the Plan period); and (2) the housing requirement in the adopted Local Plan (460dpa) and the housing requirement (derived from the standard method) proposed by the partial review (296dpa). • In relation to matter (1). The adopted Wyre Local Plan objectively assessed need (OAN) is 479 dpa and the housing requirement is 460dpa, this created an unmet need of 380 dwellings over the Plan period (2011-2031). The Sustainability Appraisal Addendum (of the Main Modifications) considered the consequences with an assessment of the proposed approach (464dpa) and the assessment of the OAN (479dpa) as a reasonable alternative. The consequences of this unmet need have therefore already been considered as part of the SA process for the now adopted Local Plan. <i>(Please note, the SA Addendum assessed 464dpa, this is because the Planning Inspector made some further amendments to the main modifications which lowered the housing requirement to 460dpa following the SA assessment. The Inspector's report concluded at §4 that this revision does not undermine the SA that has been undertaken).</i> • The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). • Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-2031, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings. If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. On this basis, there is no unmet need in Wyre that falls to be considered by neighbouring local authorities. • In relation to matter (2), it is assumed that the response is in relation to an assessment of 460dpa (adopted Local Plan) and 296dpa (proposed by partial review). The proposed revision of 296dpa in the partial review does not create unmet need in Wyre and has no consequences for the Fylde Coast Housing Market Area (Blackpool, Fylde and Wyre). Therefore, Wyre's housing needs will be met in Wyre by this partial review.

				<ul style="list-style-type: none"> The SA of the partial review has considered the need for an assessment of reasonable alternative (§3.3.1) and concludes there are no reasonable alternative options to the local housing need of 296dpa, due to no exceptional circumstances to justify an alternative approach over standard method. An assessment of the current adopted housing requirement is not a reasonable alternative option for the partial review. The adopted housing requirement is based upon an assessment produced prior to the introduction of the new approach, and subsequent revisions to national planning policy and guidance.
0023/P/002/D	Amy Kennedy, Natural England	n/a	Concur with the conclusions of the Sustainability Appraisal Report.	Noted.

<u>Wyre Local Plan Partial Review (2011-2031)</u> <u>- Publication (Reg 19)</u> <u>STATEMENT OF CONSULTATION - Annex 2</u> <u>RESPONSES TO THE PUBLICATION DRAFT 2021</u>				
Table 8 - Summary of Representations on the Habitat Regulation Assessment (E)				
Unique Ref	Name	HRA ref	Summary of Representation	Response
0023/P/003/E	Amy Kennedy, Natural England	n/a	Concur with the conclusions of the HRA Screening Report.	Noted.

Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT 2021

Table 9 - Summary of Representations on the Evidence Base (F)

Unique Ref	Name	Document	Summary of Representation	Response
0009/P/001/F	Development Consortium c/o Cushman & Wakefield	Viability Appraisal	<p>A number of detailed comments have been made about the conduct of the Local Plan Viability Assessment (LPVA 2021) - its methodology and outcomes. A summary of the headline key points follows (please see the original representation for the full range of issues raised):</p> <ul style="list-style-type: none"> • The LPVA 2021 takes a short-cut approach that does not meet the requirements of the National Policy Framework, National Planning Practice or professional guidance; • The cumulative local and national policy burden is not demonstrated to lead to viable and deliverable development; • Disagree that the viability position has improved over that reported in the viability appraisal that supported the now adopted Wyre Local Plan (LPVA 2017); • The LPVA 2021 is not a proper update of the LPVA 2017 produced to support the now adopted Wyre Local Plan but is a high-level indexation review only with concerns raised about the appropriateness of data sources used, the time elapsed since the LPVA 2017 and changing economic and market conditions; • New national policy requirements relating to energy efficiency (Part L) and biodiversity net gain are excluded from the testing and as such the costs are not factored into the analysis; • No up-to-date review of recent S106 Agreements in Wyre to assess whether the previously assumed (LPVA 2017) S106 contributions of £1,200 per plot remains appropriate. Recent evidence suggests that the allowance is insufficient, particularly for larger sites; • Previous LPVA 2017 assumptions regarding the implementation of accessibility standard M4(3) are too low; • Insufficient evidence for site residential typologies, housing mix and unit size assumptions. The LPVA 2021 does not review up-to-date consented local new build evidence to sense check the previous LPVA 2017 assumptions; 	<ul style="list-style-type: none"> • Wyre council is undertaking a partial review of the local plan and the evidence base produced in support of this is proportionate to this end. The Partial Review proposes limited policy changes and none that have a negative impact on the ability of the Plan to deliver development. Indeed, CW agree with conclusions of the FVA that the policy changes proposed under the partial review do not appear to materially impact on the viability inputs or result in any new development costs which need to be factored into the viability testing. The CW response does not claim that the revisions proposed through the Partial Review are unsound as a result of viability matters. • The council has launched a Local Plan Full Review, through a regulation 18 scoping exercise. The evidence base supporting the new local plan will include a new viability assessment. This viability assessment will include a full update and review of all costs and values for new development in the Borough. This will include analysis of all new build sales prices, affordable housing transfer prices and relevant land transactions. The new FVA will also establish an appropriate basis on which to assess build cost having regard to local market evidence. The new FVA will also assess and test the viability of all national standards such as Part L and biodiversity net gain alongside the policies and proposed allocations contained in the emerging new local plan. • The approach adopted in the FVAR is to consider typical market signals in terms of house prices based on Land Registry average prices for Wyre together with build cost changes based on the tender price index (TPI). A comparison of the two then allows conclusions to be reached about the extent to which market changes based on these measures may signal that there has been a change to the viability position previously reported in the FVA2017. This is considered to be a reasonable and proportionate approach given the limited extent of the partial review. • Market signals also take the form of evidence of actual delivery. In terms of market signals the delivery of new housing and in particular affordable housing has also been taken into consideration to identify whether issues arising from plan viability may be undermining the deliverability of the plan. There is no evidence that this is the case.

0009/P/001/F continued	Development Consortium c/o Cushman & Wakefield	Viability Appraisal	<ul style="list-style-type: none"> ● Information on house price indexation/market housing sales values over-relies on land registry data that is impacted by the effects of COVID-19 pandemic and as such is not a reliable data-set on its own, does not necessarily reflect values on the ground and therefore overstates viability; ● Affordable housing transfer values are overstated and insufficiently evidenced with no up-to-date consultation with local registered providers to sense check previous LPVA 2017 assumptions; ● Assumed build cost inflation is too low and not reflective of more recent cost inflation; ● Not clear that the previously adopted build cost database (LPVA 2017) was “reflective of local market conditions” and whether it was suitably robust for the purposes of the testing. Lack of transparency regarding the data used. The LPVA 2017 has a flawed approach to the application of build costs associated with generic house type typologies; ● Abnormal cost assumptions for the brownfield typologies are below a reasonable allowance, whilst a nil abnormal allowance for greenfield sites does not reflect market realities; ● Insufficient evidence base for the assumed existing use values, including lack of up-to-date local market transactional evidence. Insufficient evidence base for the assumed landowner premiums. No local market land transactional evidence provided to assess whether there has been any change in residential land values in the local market and to sense-check LPVA 2017 assumptions; ● Agree that local policy changes do not appear to materially impact on viability inputs or result in any new development costs that need to be factored into viability testing. 	<ul style="list-style-type: none"> ● As noted at para 4.5 of the FVAR there are only two allocations providing just under 273 units from the 5,192 allocated in the plan that do not benefit either wholly or in part from planning permission or have pending planning applications. Applications continue to come forward on allocated sites and the council continues to work positively with potential applicants. There is no evidence that Wyre Local Plan requirements, including the requirement for affordable housing, are impacting on the delivery of the plan. ● Another indicator of plan viability is the extent of application specific FVAs that have been submitted with planning applications. Very few application specific FVAs have been submitted in relation to either the allocations or other sites within Wyre. In these cases viability issues arose as a result of either the extent of abnormal costs or the form of development proposed (i.e. bungalows or apartments) or a combination of both factors. Policy SP6 Viability is specifically written to provide flexibility in the application of Local Plan policy requirements where there are justifiable and evidenced viability concerns expressed by an applicant. The evidence is clear that this policy is working exactly as intended and that the Local Plan is drafted in a way that can accommodate site-specific viability concerns. ● CW make comments regarding the adopted Local Plan Viability Assessment. It is noted that at Publication stage, only two responses were received that concerned the FVA. The comments raised by the respondents were addressed. No comments were raised in relation to the construction costs or the cost database that informed the construction costs either before or during the examination hearings. No issues were raised by the Inspector. The Plan was found sound with the FVAS as part of the supporting evidence base. ● The approach used to establish any change to the viability position is the same as that adopted for the recent partial review of the Fylde Local Plan. This has been subject to examination and has been adopted. No issues were raised through the consultation or examination process regarding the partial review Viability Assessment
0022/P/014/F	Mark Evans, Fylde Council	LPR1 Background Paper	<ul style="list-style-type: none"> ● Table 1 makes the calculation as a figure for 2021. However, in §3.6 it is noted that the proposed housing requirement should change as of 2019. The reason given in §3.7 is to ensure consistency with Fylde Council. This approach is not consistent with Fylde Council, as Fylde commenced the amended housing requirement from the same year as the standard method calculation was made (the most recent figure when the Housing Need and Requirement Background Paper 2019 was written). For consistency with Fylde, either the 2019 standard method figure should be calculated and used, or the new housing requirement should commence from 2021 rather than backdating it. As it is, the housing requirement for the period 2019-21 is not based on a calculation of housing need for that period. ● Section 2 and 3 make no reference to assessed housing need figure for 2011-2019 of 479, or the difference between 460. This does not address the shortfall for that period, which is the reason for inclusion of Policy LPR1. It does not address how the identified shortfall (152 dwellings 2011-2019, or 190 dwellings if rebased to 2021) will be provided for. Fylde Council has made provision for 380 dwellings in its Partial Review to meet the unmet need in Wyre Local Plan 2011-2031. The background paper should acknowledge this, and should consider whether the shortfall could and should be met instead within Wyre borough, given the headroom supply. ● §8.3 is misleading, Fylde Council were progressing their Partial Review in line with §212 NPPF19. Wyre Council advised Fylde Council that their Partial Review had been paused. Fylde’s Inspector letter states "It is clear that the local plan review processes have not been aligned to assist this". Alignment would have meant Fylde Council delaying the Partial Review of its adopted plan, in conflict with the requirements of NPPF19. §8.3 should be rephrased to quote precisely why Fylde's Inspectors Letter of 30 April 2021. 	<ul style="list-style-type: none"> ● The NPPF 2021 requires the minimum number of homes to be informed by a local housing need assessment, conducted using the standard method in national planning guidance. ● The PPG Housing and Economic Needs Assessment 008 (Reference ID:2a-008-20190220) requires planning authorities to calculate their local housing need figure at the start of the plan-making process. Wyre Council formally commenced its partial review in February 2020, within the monitoring year 21019/20. Therefore, it is appropriate for the standard method calculation to be used from 2019 onwards. ● The PPG goes on to state that the need figure generated using the standard method may change as the inputs are variable and should be taken into consideration. It is therefore appropriate to use the standard method calculations from 2021 to take account of the most up to date calculations and back date this to the commencement date of the partial review. This approach is consistent with the NPPF and PPG. ● the Fylde Coast (Blackpool, Fylde and Wyre) is a single housing market area. Backdating the calculation also aligns with Fylde Council using Standard Method from 2019. ● The background paper currently includes cross reference to Fylde Council's Local Plan Partial Review: Inspectors Post Hearing letter to Fylde Council. ● The partial review has considered the matters contained in Policy LPR1 and concluded that the standard method is to be used for determining the level of housing need. Application of the standard method produces a housing need of 296 dwellings p.a. (net). ● Based on a housing need of 460 dwellings p.a. 2011-2019 and 296 dwellings p.a. 2019-203, the total Plan housing requirement is 7,232 dwellings 2011-2031. The Partial Review identifies a total housing land supply of 9,423 dwellings. If this position is accepted by the Local Plan Inspector, Wyre council can meet its housing needs in full through the Partial Review. On this basis, there is no unmet need in Wyre that falls to be considered by neighbouring local authorities.

0022/P/015/F	Mark Evans, Fylde Council	Housing Implementation Strategy (HIS) Partial Review	At the time of writing this response Fylde has adopted the Fylde Local Plan to 2032 (incorporating Partial Review) which provides for the currently unmet housing need identified in the current version of the Wyre Local Plan (380 dwellings). This should be acknowledged when this document is updated to a base date of 31st March 2022.	Noted.
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Wyre Local Plan Partial Review (2011-2031) - Publication (Reg 19)

STATEMENT OF CONSULTATION - Annex 2

RESPONSES TO THE PUBLICATION DRAFT 2021

Table 10 Responses on appearance at the sitting session of the Public Examination

*** and DNC indicates that the representor does not wish to be contacted further about the local plan.**

Personal ID	Name	Organisation	Agent	Wish to appear? Y,N,N/S	DNC?
0001	Warren Hilton	National Highways	n/a	Not stated	n/a
0002	Deb Roberts	The Coal Authority	n/a	DNC	DNC
0003	Robert Cooke	n/a	n/a	No	n/a
0004	Benjamin Rogers	Lead Local Flood Authority	n/a	Not Stated	n/a
0005	Ari Akinyemi	NHS Property Services	n/a	Not Stated	n/a
0006	John Hallas	Claughton-on-Brock Parish Council	n/a	Not Stated	n/a
0007	Alexander Hazel	Environment Agency	n/a	Not Stated	n/a
0008	Andrea Fortune	Kingswood Homes	n/a	Not Stated	n/a
0009	Derek Nesbitt	Cushman and Wakefield (on behalf of - Story Homes, Oakmere Homes, Persimmon Homes, Eric Wright Group, McDermott Homes, Wainhomes and Rowland Homes)	n/a	Not Stated	n/a
0010	Joanne Harding	Home Builders Federation (HBF)	n/a	Yes	n/a
0011	c/o agent	NPL Group (UK) Ltd	Phil Robinson, Pegasus Group	Yes	n/a
0012	c/o agent	Story Homes	Dan Mitchell, Barton Willmore LLP	Yes	n/a
0013	c/o agent	Ministry of Defence	Chris Waldron, Defence Infrastructure Organisation	Not Stated	n/a
0014	Sharron Wilkinson	Sport England	n/a	Not Stated	n/a
0015	c/o agent	Taylor Wimpey	Tamara Ettenfield, Lichfields	Not Stated	n/a
0016	c/o agent	Wainhomes	Stephen Harris, Emery Planning	Yes	n/a
0017	Josh Plant	Gladman Developments	n/a	Yes	n/a
0018	Marcus Hudson	Lancashire County Council	n/a	Not Stated	n/a
0019	Roger Brooks	Garstang Town Council	n/a	Not Stated	n/a
0020	Matthew Symons	Hollins Strategic Land	n/a	Not Stated	n/a
0021	Jackie Copley	CPRE	n/a	Not Stated	n/a
0022	Mark Evans	Fylde Council	n/a	Not Stated	n/a
0023	Amy Kennedy	Natural England	n/a	No	n/a
0024	Hannah Jones	Homes England	n/a	Not Stated	n/a