1 INTRODUCTION
1.1 This document represents the submission of FPC to the Wyre Local Plan Examination document “Matters, Issues and Questions for the Examination and Hearing Sessions”. It supplements, but endeavours not to repeat, earlier representations.

1.2 Paragraph references used below are those used in the above document.

2 SESSION 2 MATTER 2 STRATEGY AND STRATEGIC POLICIES
Para 4.4 “Is the strategic area of separation between Forton and Hollins Lane justified”
2.1 The main settlement of Forton is largely a development of the 1960s, whilst Hollins Lane is an old linear settlement stretched along the original high road from Lancaster to Preston. It contains late 18 century and early 19 century weavers' cottages and has always been seen by residents as distinctively embedded in a rural context, surrounded by fields and views of the fells. Wyre has accepted and protected the linear form so valued by residents and the strategic area of separation will continue this commitment, preventing the coalescing of two very different settlements.

3 SESSION 3 MATTER 3 HOUSING AND EMPLOYMENT OBJECTIVELY ASSESSED NEEDS (OAN) AND REQUIREMENTS
Para 1.3 “Should the OAN be lower...”
3.1 When considered in the context of the DCLG standardised methodology for assessing housing need, which produces a requirement of 313 dwellings per annum, Wyre’s OAN of 479 appears excessive. Since FPC submitted its representations on the Local Plan (LP) the Government has considered the responses to the consultation on the standardised methodology and made clear its intention to proceed with this methodology for authorities, establishing their minimum housing requirements in future plans. It considers the standardised methodology as "the most appropriate method that meets the three key principles of being simple, realistic, and based on publicly available data".

3.2 The approach does allow authorities to set a higher figure for example as a result of a strategic infrastructure project or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with government or through delivering the modern Industrial Strategy. The draft revised NPPF reads:

In determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals. In establishing this figure, any needs that cannot be met within neighbouring areas should also be taken into account.
3.3 However to help ensure the method is deliverable a cap is proposed. For authorities such as Wyre who do not have an up to date plan this would be set at 40% above projected household growth. In Wyre’s case for the full plan period 2011-2031 this would be 6,000 households or 300 dwellings pa, or 2017-2031 4,000 households over 14 years or 285 dwellings pa. Adopting this approach the capped requirement would at 420 dwellings pa or 399 dwellings pa.

3.4 The transitional arrangements do allow authorities who have submitted their plans for examination or will do so for six months after adoption of the Revised NPPF such as Wyre, to assess their OAN for housing on the basis of the current NPPF and associated National Planning Practice Guidance.

3.5 However the disparity between Wyre’s unconstrained OAN of 479 dwellings pa and the standardised methodology figure of 313 dwellings pa (an increase of more than 50%) must raise questions as to how objective this figure is. Indeed the authors of the report proposing the 479 figure prior to the standardised methodology being published did recommend to Wyre Council that:

OAN III (Sept 2017) – Executive Summary Para 4 recommends

The Council considers the implications of the consultation on the standardised methodology on its release to identify any significant departure in the scale of implied housing need

3.6 Irrespective of whether land could be identified to meet a housing requirement of 479 dwellings pa there must be serious doubts over the justification for, and deliverability of, housing on this scale when:

1) Historic rates of housing completion in Wyre have averaged only 265 dwellings pa 2003-2017 and only 286 dwellings pa 2012-2017.

2) A massive adjustment of an additional 152 dwellings pa has been made to the 283 dwellings pa demographic starting point – which represents in isolation an adjustment of 52% i.e. much more than the proposed 40% cap that the standard methodology suggests to reflect deliverability.

3) The figure has been further increased by 44 dwellings pa on the basis of economic and market signals reflecting highly ambitious projections of job growth particularly on the Wyre Peninsula. The achievement of such growth is all the more challenging when considered in the context of the Preston/South Ribble/Lancashire County Council City Deal ambitions providing far more accessible opportunities for business investment than presented by the Wyre Peninsula.

3.7 For all the above reasons it is suggested that the constrained plan requirement of 411 dwellings pa is the very most the plan should be using as its OAN for housing and that there is a case for this figure being reduced further. Indeed Wyre hints at such an approach in stating in their Housing Background Paper that Wyre considers that the new lower target should be a consideration in justifying the housing requirement in the new Local Plan. (Para 4.6 Housing Background Paper January 2018)
Para 4.5 “Is there justification for releasing more employment sites for housing in view of the shortfall in housing compared to employment land?”

In the context of the serious doubts as to whether employment land requirements are overstated, and a relatively poor spatial relationship between new employment sites and new housing areas, the release of some employment sites for housing would seem eminently sensible and could assist in reducing the housing proposals for rural villages such as Forton to a more manageable and appropriate scale.

4 SESSION 5 MATTER 5 SPECIFIC HOUSING NEEDS AND GENERIC HOUSING POLICIES
Para 1.2 Housing Mix Policy HP2 “Is the requirement for developments to provide 20% of housing for older people justified?”

Para 1.3 Housing Mix Policy HP2 “Does the wording of HP2 allow for sufficient flexibility...”

Policy HP2 needs to include a target for the provision of low cost private starter homes of 10%.

Para 2.1 Affordable Housing “Are the levels of affordable housing justified”

In rural areas the target of 30% for affordable housing should comprise 20% social housing to reflect the shortage of jobs in the countryside, 10% private low cost homes and offer a range of properties allowing the opportunity to upsize or downsize as required.

5 SESSION 12 MATTER 8 – ALLOCATIONS FORTON AND HOLLINS LANE
Issue 1 – Identification of sites
Para 1.1 “Is the approach within the SHLA to assessing suitability of sites in the settlement robust?”

FPC has agreed the identification of sites with Wyre in placing the majority of housing on or close to the A6 (notwithstanding our objection to the scale of the allocation) to specifically avoid any impact on land adjacent to the cricket club and mitigate the impact on narrow rural roads and enhance safety around the school.

Forton and Shireshead Cricket Club is widely regarded as one of the most picturesque locations, not only in the immediate locality, but also in the whole of Lancashire and beyond.

FPC considers that part of the site identified as FOR_06 in the SHLAA remaining in the LP, should be removed completely, given that it is landlocked with no access to the A6.
5.3 **Para 2.1 (i) “the scale of allocations relative to the size of the village”**
Our comments regarding the OAN are included in section 3 above and FPC’s view is that the OAN should be a maximum of 411 dwellings pa, with a case for this number to be reduced further.

5.4 The LP proposes a target of 468 houses in the Forton Extension over the planning period. This compares to some 200 at present, an increase of 230%. This massive increase is not based on normal planning considerations but simply to help meet Wyre’s overall housing target and is based on the Highways’ study which concludes that this part of the A6 has capacity to accept a specified increase in traffic.

5.5 Another perspective on the scale of allocations is that although Forton and Hollins Lane together have only 1.3% of Wyre’s population, the LP includes 18.6% of Wyre’s housing target. These figures starkly illustrate how unreasonable the Wyre proposal is. FPC accepts the need for more houses in Forton, but development at this pace is unsustainable.

5.6 Based on FPC’s view that the OAN should be reduced to 411, or even lower, a more sustainable housing allocation for the Forton Extension would be 300 over the plan period, which equates to a build rate of 23 per annum compared to 11 in recent years.

5.7 FPC proposes, therefore, the following change to the LP page 146 “Site SA3/4 Forton Extension: Reduce housing capacity from 468 dwellings to 300 dwellings”. FPC intends that the majority of development will be on or near the A6 and FPC’s preference for sites which would yield c300 dwellings is outlined in red on the attached map of the Forton Extension at Appendix I.

5.8 Forton has a strong community identity based on its rural location, many long standing residents, strong social links and shared activities. The scale of the proposed Forton Extension would completely transform the character of the village and undermine its social cohesion. It would change from village to town without the appropriate health and community infrastructure and with few local jobs would ensure Forton and Hollins Lane remains a commuting settlement, without a coherent identity. It would lack social and economic sustainability, contrary to the aims of the NPPF.

5.9 FPC’s proposal above, to reduce the number of dwellings in the Forton Extension, together with restricting development to close to the A6, would go some way to mitigating the impact on the character and appearance of the village and surrounding countryside.
Para 2.1 (iii) “the availability of services and employment within or close to the village, including school places, health services and convenience store”

5.10 Regardless of the token allocation of 1 ha of employment land, the reality is that Forton will remain almost wholly a commuter settlement that is particularly attractive to those working in employment centres that can be conveniently accessed from the M6 such as Lancaster, Preston, Manchester and Liverpool. It is not well placed to access the main focus of Wyre’s employment growth on the Wyre Peninsula.

5.11 Existing and future residents will continue to be heavily reliant on private transport for higher order services including shopping, health, libraries and only housing adjacent to the A6 will have convenient access to bus services. This further links to FPC’s proposal above of the reduction in dwelling numbers and restriction to sites adjacent to the A6.

5.12 One hectare of employment land, as envisaged by the LP, will make little difference to the inevitable ongoing dependency on private transport. Furthermore, FPC considers that the availability of any increased school capacity, a community centre and health support will inevitably lag behind any development, given that the only source of funding is currently from s106 requirements on developers.

5.13 Para 2.1 (iv) “choice of modes of travel to access services and jobs”

With little additional local employment the car will continue be the predominant means of travel to work and to access services, locally in Garstang but beyond for larger centres. Experience shows that following incidents on the M6, the A6 becomes gridlocked with a knock in effect on the local road network. FPC also notes in the highways evidence that the junction of the A6 with Hollins Lane and Ratcliffe Wharf Lane has a high level of traffic incidents. This will be a major connection from the existing planning approvals on Hollins Lane coupled with the additional Forton traffic.

5.14 Assertions that public transport on the A6 will be adequate to meet the needs of the proposed increase in population are most unlikely. Public transport is inadequate for the current population, let alone Wyre’s proposed increase.

5.15 Para 2.1 (v) “the loss of the best and most versatile agricultural land”

All the proposed development is on agricultural land which has been farmed for decades.

5.16 Para 2.1 (vi) “the highway network”

Forton and Hollins Lane is divided by the A6 which is the key route out of the settlements. Despite assertions to the contrary by the Highways Report, this main route is already at, or near, capacity. FPC has grave reservations regarding the impact of the additional volume of traffic generated by development proposed in the LP and neighbouring parishes eg 900 properties at Ellel.

5.17 Para 2.1 (vii) “the creation of inclusive or mixed communities”

The size of the proposed Forton extension would place large scale development
next to existing housing which would not yield an integrated and inclusive community, especially if the mix of property did not facilitate local ownership.

5.18 **Para 2.1 (viii) “flood risk and drainage”**
Recent heavy rainfall resulted in floods in Galgate just north of the parish, leaving the A6 impassable, as well as impacting on land in Forton proposed for development.

5.19 **Para 2.1 (ix) “biodiversity impacts”**
The loss of agricultural land to development will inevitably have a detrimental impact on the biodiversity of ground nesting birds and other wildlife.

5.20 **Para 2.1 (x) “heritage assets”**
As noted earlier, whilst Forton as a focused settlement is a 1960s creation, there are a number of farmsteads and houses that mark the area’s earlier history, including the nonconformist church at the centre of the village. As noted earlier, the separate Hollins Lane settlement stretching along the old High Road to Scotland, contains a number of 18 and 19 century properties which reflect the close integration of the textile industries with their hinterland and the provision of hospitality to travellers. More recently, the village has built a strong community around its dynamic and successful cricket club, sited on a ground which is the most picturesque in Lancashire.

5.21 **Para 2.1 (xi) “gas main safeguarding”**
There has been confusion by Wyre BC and HSE as to the impact of two high pressure pipelines which cross just outside the village on development land allocated in the LP. FPC has serious doubts that sufficient attention is being given to the safety concerns of residents.

5.22 **Para 2.1 (xii) “climate change implications”**
FPC’s comments elsewhere regarding the lack of sustainability of the proposed scale of development will inevitably contribute to climate change. Consideration needs to be given to infrastructure for the future needs of electric vehicles for example.

5.23 **Para 2.2 “do the existing bowling green and playground need to be included in the allocation and/or relocated?”**
FPC has strong views regarding retaining the existing location of the recreation field/games area and bowling green. It is a fundamental part of the village in a location which acts as a link between Forton and Hollins Lane, given they are separated by the A6. The settlements have an ambition and current design to develop a modern, flexible community hub on this site irrespective of the LP. Further land needs to be made available adjacent to this site to extend for the community hub and the recreation field/games area. FPC and residents will vigorously resist any relocation which will in any event require a village wide referendum under the constitution of the Village Hall and Recreation Ground Committee.

5.24 **Para 2.3 “Are the extent of the allocations and their capacity appropriate?”**
FPC’s view on the allocation for Forton is set out in the response to 2.1(i) at para
5.3 above. Given the target of 468 (which FPC does not accept) then the land allocated is adequate.

5.25 **Para 2.4** “Would the requirement for a masterplan to be agreed at planning application stage prejudice the delivery of the site (or part of it)?”
Existing approvals on Hollins Lane will be more than adequate to meet existing demand in the short term and hence provide the opportunity for a masterplan to be developed with input from the local community.

5.26 **Para 2.5** “Are all the key development considerations necessary and clear to the decision maker?”
Key Development Considerations have been highlighted in the previous submission by FPC. However, we see a community led masterplan rather than developer led masterplan as fundamental to any future development and we request that the Inspector includes this in his recommendations.

**Issue 3 – Hollins Lane (SA1/14 and SA1/15)**
**Para 3.1** “Are all the key development considerations necessary and clear to the decision maker?”

5.27 Both these sites have existing planning approvals, but we request that the Inspector includes in his recommendations a requirement for a community led masterplan.

**Issue 4 – Infrastructure**
**Para 4.1** “Will the infrastructure to support the scale of development proposed in the settlement be provided in the right place at the right time, including that related to transport, the highway network, health, education and open space?”

5.28 FPC has concerns, given the proposed scale of development, that infrastructure will inevitably lag that development. Capacity constraints already exist regarding foul and surface water drainage as well as highways, both on the A6 and narrow rural roads. The LP refers to provision for health facilities and a local shop as well as a community facility/hub but FPC has no confidence that s106/CIL funding from developers will be made available at the appropriate time. The same concerns apply to the requirement to increase the size of the school buildings and land.

**Issue 5 – Delivery**
**Para 5.1** “Are the assumptions about the rate of delivery of houses from the allocations realistic?”

5.29 Obtaining landowner agreement to the Forton masterplan may hold up delivery.
Site Area: 29.63 Hectares

Use: Housing and Employment

Housing Capacity: 380 dwellings

Employment Capacity: 1 hectare

Site Delivery: The site is expected to contribute 380 dwellings to the housing land supply within the plan period.

Site Description
The site consists of several parcels of land of varying topography that lie both west and east of the A6 and mostly in agricultural use. The north and south eastern parcels are intersected by School Lane, whereas the south east and south west parcel are intersected by Winder Lane. The allocation includes the village bowling green, pavilion and play area at the junction of School Lane and Winder Lane. The site includes a number of hedgerows, trees, ponds and public rights of way.

Key Development Considerations
1. This site is to be brought forward in line with a masterplan to be produced covering the whole of the site. The masterplan must be agreed by the local planning authority prior to the granting of planning permission for any part of the site.

2. The development should be supported by a landscape and green infrastructure framework incorporating structured tree planting, on-site open space to include formal