

RESPONSE OF SAVE OUR SCORTON RESIDENTS ASSOCIATION (OBJECTOR REF 510)
TO WYRE LOCAL PLAN EXAMINATION MATTERS, ISSUES AND QUESTIONS

SESSION 2 STRATEGY AND STRATEGIC POLICIES

Issue 1 The spatial distribution of development

1.1 ***Is the strategy for the distribution of development (described as 'dispersal') justified?***

In its distribution of development, Local Plan proposals struggle to deal with the disparate geography of the local authority area and the fact that functionally Wyre can be divided into 2 very distinct and different areas in terms of the focus of housing/jobs and main transport corridors.

These are the Poulton/Cleveleys/Fleetwood part of the Fylde Coast Urban Area and the A6 corridor encompassing the market town of Garstang and villages to the north and south. In terms of sustainable access to services, employment and transport links the former area relates far more closely to Blackpool and to Preston via the A585 and M55 and the latter to Lancaster and Preston rather than to each other.

The plan justifies the *dispersal* development strategy largely by severe flood risk and highway constraints resulting in a level of housing growth in the A6 Corridor that does not relate well to the settlement hierarchy and by virtue of the remoteness of much proposed housing from local facilities, centres of employment and public transport facilities, will result in a reliance on private transport that sits uncomfortably with the principles of sustainable development as set out in the NPPF.

The overall planning strategy is described as *Growth within Environmental Limits* but is largely one of *Growth within the constraints posed by flood risk and highway capacity*.

Wider environmental considerations including reducing the need to travel, particularly by car, and recognising the intrinsic character and beauty of the countryside become somewhat subservient to the imperative to meet housing need.

Notwithstanding these tensions, given the priority accorded by government to boosting the housing supply and if a requirement for 411 dwellings per annum is accepted as a robust OAN for housing for Wyre then some dispersal of development away from the most sustainable *urban towns* becomes necessary if this requirement is to be accommodated.

However, even if it proves possible to identify additional housing sites that are not adjudged to be constrained by flood risk or highway constraints, **the release of further sites that might contribute to the unconstrained objectively assessed housing need of 479 dwellings pa, is considered wholly unjustified.**

In part this is because there would appear to be significant doubt over the robustness of the evidence base for the full OAN figure (see later submission) including whether the market could deliver this rate of housing development.

However **further proposed housing and site release is also considered** unacceptable in that it:-

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- 1) Would be likely to **tip the balance of housing development even further towards heavily private transport reliant rural settlements** rather than the most sustainable Urban Town tier of the settlement hierarchy. Garstang and the rural areas to the East of the Wyre Peninsula are already taking over 50% of proposed housing development
- 2) **Is likely to involve further excessive expansion of villages in the A6 Corridor** such as Forton which is already proposed to more than treble in size.
- 3) **Would be likely to result in pressures for significant “commuter” development of villages that are not suited to such growth in environmental, economic or social terms.**

Scorton is a prime example of such a village. Its character and appearance, heritage and proximity to the Forest of Bowland AONB make it very attractive to housebuilders and house buyers. However the village has no public transport. There is no evidence that such development is required to meet local needs, and if allowed it would undermine the very facets that make the village so attractive to visitors, supporting the local tourism economy and encouraging Wyre and other Lancashire residents to indulge in walking and cycling that is so beneficial to physical and mental health.

1.2 The LP should include a Key Diagram.

Issue2 The Settlement Hierarchy

2.1 Is the position of settlements in the hierarchy within Policy SP1 justified

The position of settlements in the settlement hierarchy should be more heavily influenced by the absence of public transport than is currently the case and should take explicit account of the character and function of settlements and their capacity to absorb growth without detracting from this. The settlement study accepts this to a degree stating. :-

2. The role of a settlement and its place within the local plan settlement hierarchy may also be dependent on its **potential** for development, including development that would support existing, or attract new, services and facilities. The settlement study is therefore designed to provide a baseline understanding of the nature and role of settlements – it is a piece of evidence that will inform the plan-making process.

However it sees potential for development only in a positive sense in justifying a settlement being higher in the settlement hierarchy than indicated by its size, facilities etc.

It does not seem to see constraints on development, e.g. its sensitivity to further built development being a reason for placing a settlement lower in the settlement hierarchy than might be indicated by the narrow considerations of population, services and facilities and transport.

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The crude scoring matrix attaches insufficient importance to the existence or lack of access by public transport. The entire absence of reasonable access to public transport and of potential for its provision, should be seen as indicating little or any sustainable potential for significant settlement growth irrespective of the level of local population, local facilities and employment.

In Scorton's case, the absence of public transport coupled with the adverse impact that housing development beyond that required to meet local needs could have on the villages character, and tourism role, should justify it being placed low in the hierarchy. However the other scoring factors in the crude matrix result in it being categorised as a main rural settlement alongside villages, all of which have public transport and none of which have a comparable sensitivity to expansion. It is also placed above smaller villages that have public transport and are much closer to higher order facilities e.g. Cabus just outside Garstang.

SOSRA welcomes the fact that the Local Plan proposes no new housing allocations to Scorton but is concerned that the rationale for this is inadequately expressed through the Local Plan. Scorton's categorisation as a Main Rural Centre provides ammunition to those who have a strong incentive to bring forward development proposals on the edge of the village notwithstanding the zero allocation in the Local Plan.

Such proposals are not designed to meet local needs but to exploit the attractiveness of the village to house buyers and associated high sales values. The sites subject to these development pressures should be recognised as *valued landscapes* (NPPF Para 109) given their specific physical characteristics and relationship to the Trough of Bowland Area of Outstanding Natural Beauty.

It is respectfully suggested that in view of the transport and environmental constraints Scorton should be grouped with the small rural settlements and this category retitled *Small settlements; and settlements lacking public transport* (on the basis that the latter is so important in assessing sustainable development potential).

2.3 Is the amount of development within each level of the hierarchy justified?

Only if it is accepted that:-

- Wyre needs to make provision for 411 dwellings pa
- Flood Risk and/or Highway Constraints preclude the further identification of housing land within the Urban Towns.
- All employment land within the Urban Towns is either required for that purpose or inappropriate for residential development.

Should this not be the case then there is scope to reduce development proposed for the rural settlements lower in the hierarchy.

2.4 Is there sufficient alignment between housing and employment at different levels of the hierarchy?

The mismatch between employment provision and housing within the main rural settlements is unfortunate. There is considered to be little if any commercial prospect for significant job

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creation in these locations, quite apart from any environmental constraints on such development.

Given that the employment growth projected by the plan is on the bullish side, the potential for some employment land to be reallocated for housing in the Urban Town settlements particularly Fleetwood, subject to flood constraints, should be considered. This would create the potential to reduce proposed development of the *main rural settlements* (if the constrained housing requirement is accepted as fully meeting housing needs) and reduce pressure on areas of countryside such as Scorton, the character and appeal of which is acutely sensitive to further built development. .

Issue 3 Settlement Boundaries and the Countryside

3.1 Are the requirements of Sections 4 and 5 within Policy SP1 too restrictive?

No – arguably section 4 is badly worded as it can be read as allowing the majority of development to take place outside settlement boundaries and in designated countryside areas if specifically supported by another policy in the plan. Development proposals need to be judged against policies in the plan taken as a whole. The suggestion that policies restricting development in the countryside can be overridden by another individual policy is inappropriate.

Section 5 is fully supported

3.2 Is Policy SP4 consistent with national policy particularly in respect of the protection of countryside and conversion of buildings?

The original drafting of clause 1 should be retained but omitting the phrase *for its own sake* as its inclusion cannot be justified in terms of national planning policy. The emphasis should be on protecting valued landscapes that have distinctive characteristics that distinguish them from attractive but “ordinary” open countryside.

The addition of the clause beginning *unless it is demonstrated* is wholly unnecessary and is not consistent with national policy. It should be down to the applicant to argue that there are substantial public benefits that outweigh the harm to the open and rural character [of countryside] as a material consideration warranting a departure from development plan provisions.

The rest of the policy is supported and considered to be consistent with national policy.

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SESSION 3 HOUSING AND EMPLOYMENT OBJECTIVELY ASSESSED NEEDS (OAN) AND
REQUIREMENTS

1. The Housing OAN

1.1 Does the evidence base support the OAN for housing of 479 dwellings per annum (dpa) or 9580 dwellings for the LP period?

No. It can be argued that the constrained requirement of 411 dwellings pa more than fully meets objectively assessed needs for the reasons set out below.

SOSRA considers that the full OAN of 479 dwellings per annum significantly overstates Wyre's future housing needs. It is hugely concerned that its acceptance as Wyre's OAN has already resulted in excessive swathes of countryside being allocated for development and may result in further damaging and unnecessary release of such sites through the Local Plan or Appeal process if this figure is not challenged and unless more balanced consideration is given to the wider sustainability of such development rather than simply on finding sites that are acceptable to the Environment Agency and Highway Authority.

When viewed in the context of the Governments new standardised methodology for assessing housing needs (suggesting a minimum housing requirement for Wyre 2016 – 2026 of 313 dw pa), the constrained housing supply figure adopted by Wyre of 411 dwellings per annum is more than adequate to meet the housing needs of the Borough even when economic growth considerations are factored in.

Notwithstanding the transitional arrangements that allow Local Authorities to continue to use previous NPPG to define OAN Housing figures until 6 months after adoption of the new NPPF, Wyres OAN of 479 dw pa departs so substantially from application of the standardised methodology that there must be concerns over whether it overestimates Wyre's housing needs.

The calls being made by landowners, housebuilders and planning consultants to this Examination that further housing sites should be identified or development policies relaxed in order to meet the full OAN figure of 479 dw pa should not be accepted irrespective of whether they are able to demonstrate that flooding and highway concerns can be addressed. Indeed both the most recent OAN II update and Wyre Council's updated Background Housing Paper lend weight to this argument:-

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

Housing Background Paper (Sept 2017 (Jan 2018 update) - para 4.6 pages 23-24 :-

“ Wyre considers that the new lower target should be a consideration in justifying the housing requirement in the new local plan”

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Both these statements were made prior to the Government endorsing the standardised methodology in their response to the consultation and the draft NPPF. They represent a significant shift in the Council's position from justifying the constrained housing requirement of 411 dw pa on the basis of housing land supply constraints to accepting that the constrained housing requirement rather than the full OAN may be sufficient to meet housing need

The basis of Wyre's 479 dwellings pa requirement is set out in detail in the work by Turley/Edge Analytic. It is anything but transparent to anyone other than professional demographic/economic consultant. The Government set out 3 principles upon which a standardised methodology should be based, the first being that *there should be an easy and transparent process for local people and other interests to understand.*

The housing requirement has left many Wyre residents particularly those living in its rural areas that are having to accommodate much of that need:-

- Baffled as to the rationale for the overall housing requirement
- Horrified by the rural locations in which major housing growth is proposed and puzzled as to how it is sustainable to promote development on this scale in locations that are remote from centres of employment, have few local facilities and poor access to public transport.
- Doubtful as to whether there is the market demand or capacity in the housebuilding sector to deliver even the constrained housing numbers proposed (411 dw pa) a figure 55% above the historic provision of 265 dw pa over the period 2003-2017.
- Worried that, even with this constrained figure of 411 dwellings pa Wyre will struggle to demonstrate and maintain a 5 year housing supply and as a result struggle to ensure that development is plan-led.

479 is some 60% higher than the demographic starting point in terms of 2014-based projections of household formation (300 dw pa).

If Wyre Borough Council were to prepare its local plan now under the new standardised housing methodology the minimum requirement 2011-2031 is estimated as follows:-

With an adjustment factor based on the governments housing affordability ratio of 0.1375

Adjustment factor = (6.2 – 4) divided by 4 multiplied by 0.25 = 0.1375

1+ 0.1375 (adjustment factor) x projected household growth 2011 to 2031 of 6,000 households = **6825 dwellings = 340 dw per annum.**

This compares to a full OAN of **9580 dwellings** (requirement of **479 dw pa**) – a **40.3%** increase or a constrained requirement of **8224 dwellings (411 dwellings pa)** – a **20.4%** increase.

It is worthy of note that the standardised methodology seeks to establish a minimum baseline of housing need in terms of demographics and local housing affordability that Local Planning Authorities can adjust on the basis of other local factors particularly local economic growth **The methodology does not suggest that individual authorities should adopt a customised approach to establishing the demographic starting point other than in the most exceptional circumstances.** . It is not accepted that the OAN evidence such circumstances.

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The OAN calculations by Turley/Edge Analytics choose to use a much higher long term demographic projection than used in the standardised methodology, accounting for a requirement of an additional 130 dw pa to 413 dw pa – an increase of 46% on their demographic starting point which they increase to 435 dw pa on the basis of a headship rate adjustment. **It is a key element of the government’s proposals that demographic projections should be transparent and standardised.**

Table 7.1: Considering the OAN for Wyre

	Dwellings per annum 2011 – 2031	Adjustment from 'starting point'	
		Dwellings per annum	% uplift
The 'starting point' – 2014-based SNHP	283	–	–
Long-term demographic projection	413	130	46%
Adjusted demographic projection with headship rate adjustment	435	152	54%
Market signals adjustment (+5%)	457	174	61%
Implied need to support forecast job growth ¹¹²	415 – 513	132 – 230	47 – 81%

Source: Turley, Edge Analytics, 2017

There is no reference in the standardised approach to authorities taking a customised approach to demographics and household formation. **To do so flies in the face of the transparency and consistency between LPAs that the government is seeking to introduce.**

Wyre’s OAN of 479 dw pa is derived by further increasing the requirement on the basis of economic and market signals by 44 dwellings per annum. The higher end of the range to support future job growth i.e. 513 dwellings pa is a response to concerns over a projected fall in the population aged 16-64 which as explained below may not be the most appropriate indicator of labour supply given rising retirement ages.

Of the factors discussed by government as justifying an increased minimum housing requirement above the standardised approach only an employment growth adjustment falls clearly within the scope they set out.

On this basis, minimum housing requirement in the region of **384 dw pa** (the estimated standardised methodology figure of 340 plus 44) might be applicable.

The constrained Local Plan requirement of **411 dwellings pa** provides some additional flexibility and supports the governments objective to significantly boost the housing supply.

411 dwellings pa should be seen as adequately meeting local housing needs and the Examination in Public should not direct itself to whether increased housing provision should be made.

1.2 Or should the OAN be higher to support job growth and the delivery of affordable housing?

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As explained in part above It is considered that the constrained housing figure of 411 dwellings pa is more than adequate to support job growth. The extent to which the housing figure has been increased to support economic growth appears excessive bearing in mind :-

- 1) the projected fall in the population aged 16-64 is just one indicator of the working age population and other measures suggest this will rise.
- 2) The provision of additional employment within the Borough could equally be seen as representing an opportunity to reduce net out-commuting and/or be supported by existing and new Blackpool residents who are better placed to access the main focus of employment opportunities at Hillhouses sustainably than those living or moving into new housing on the A6 corridor.
- 3) The projected job growth for Wyre is ambitious and vulnerable to a wide range of economic factors many more influential than housing supply.

In assessing the OAN for housing Turleys/Edge Analytics identify a risk that a projected fall in the working age population of Wyre Borough will potentially undermine economic growth ambitions and as such justifies additional housing provision. However, this ignores the fact that both the state working age population and the ILO residence-based employment population is projected to increase .

Table 6.1 Experian March 2015 Model for Wyre Borough, and underlying Population / Economic Activity Inputs 2011-2031

Wyre Borough	2011	2031	Growth 2011-31
Total Population	107,720	114,220	+6,500
Population aged 16-64	63,710	59,610	-4,100
State Working Age population*	59,560	63,320	3,760
ILO employment, residence-based**	52,410	58,120	5,710
ILO employment, workplace-based**	35,440	37,760	2,320
ILO unemployment***	3,060	1,760	-1,300
Workforce Jobs	36,930	40,500	+3,570

Source: Experian March 2015 / NLP analysis

SHMA modelling suggests that 360 dw pa will increase the labour force within Wyre (see below).

Local job growth can also be supported by the scope to reduce net out-commuting from Wyre (with potential sustainability benefits) and, in the case of employment growth in the Urban Towns on the Fylde Coast by sustainable travel to work flows from adjoining Blackpool that suffers from high levels of unemployment (almost 4,000 residents in the Blackpool North and Blackpool South constituencies were on job seekers allowance or claiming universal credit in December 2017 compared with just 390 across Wyre).

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Table 6.12 SHMA Housing OAN Modelling Outputs

	2011	2031	Change
SNPP-2012 (215 dpa)			
Population	107,692	114,032	6,340
Households	47,245	51,309	4,064
Dwellings	49,953	54,251	4,297
Labour Force	51,370	49,192	-2,178
Jobs	37,469	35,880	-1,589
PG-10Yr (280 dpa)			
Population	107,692	115,794	8,102
Households	47,245	52,547	5,303
Dwellings	49,953	55,560	5,607
Labour Force	51,370	49,874	-1,496
Jobs	37,469	36,378	-1,091
PG-10Yr-X (360 dpa)			
Population	107,692	119,578	11,886
Households	47,245	54,059	6,814
Dwellings	49,953	57,158	7,205
Labour Force	51,370	51,975	605
Jobs	37,469	37,910	441

Source: Turley 2015

In respect of adequate provision to meet affordable housing needs, the government’s new standardised housing methodology establishes a robust approach to adjusting household projections to take these into account, and the proposed revised OAN of 411 dwellings pa is considered more than adequate to meet these needs. Meeting such needs should not be entirely dependent on a minority % contribution from market housing. Raising the overall housing requirement to a level at which such needs can in theory be largely met through a contribution from market housing will not work if the demand for market housing is insufficient to deliver that requirement as is likely to be the case in Wyre. Provision of dedicated affordable housing schemes is required in these circumstances.

1.3 Alternatively should the OAN be lower taking into account the new methodology for calculating housing need proposed within the draft revisions to the NPPF.

It should be lower but this need not and should not result in the plan being found unsound.

For the reasons set out above, , it can be argued that 411 dwellings per annum, the constrained local plan housing requirement, comfortably addresses Wyre’s housing needs when the Turley/Edge Analytics figure of 479 dwellings pa is subject to scrutiny and appropriate account is taken of the much lower minimum figure suggested by the governments standardised methodology. Such a figure would still represent a substantial increase on historic levels of housing delivery and support the government’s objective to significantly boost the housing supply.

The plan should be modified to this effect or the OAN figure further reduced (as it is a figure derived from a constrained supply rather than based on need).

2. The Employment OAN

2.1 Does the evidence support the OAN of 43 ha of employment

This figure appears overly optimistic in the context of historic rates of land take-up. A downward adjustment may, subject to flood risk and highway constraints, facilitate a more

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sustainable pattern of development by the potential for reallocation of land to housing and reduced allocations and development in the main rural settlements.

3. Alignment between housing and Employment OAN

3.1 Is there sufficient alignment between the housing and employment OANs?

As explained above even if the OAN for Employment Land is appropriate in stimulating and realising economic growth and job creation within Wyre (which is open to question) it is not considered that it requires the uplift in housing provision suggested by Turleys/Edge Analytics.

4. The housing requirement of 8.225 dwellings

4.1 *Does the shortfall in the housing requirement against the OAN reflect a positively prepared LP and one that is justified?*

Yes, in the sense that even if more housing land could be identified that is not subject to flooding or highway constraints, this would in most instances result in development that fails to constitute sustainable development when environmental, social and economic factors are fully considered.

It would require allocation of further land not well related to services, employment and public transport, and be heavily reliant on private transport, failing to respect the character of local settlements, and in some instances be at an unacceptable environmental cost in terms of loss of open countryside and valued landscapes (para 109 NPPF) e.g. at Scorton. See comments on Development Strategy.

4.1 *Are the highway constraints overstated?*

No. It is appropriate that the plan take full account of the limitations on highway capacity, and specific pinch points and in particular resist development in locations that will be heavily car reliant. Relaxing these constraints is likely to give rise to heavy economic, environmental and social costs, through increased reliance on the private car, associated congestion and delay, poor air quality, a degraded public realm and social isolation for those with limited or no access to private transport (including the elderly who become unable to drive).

4.3 *In particular would development to meet the OAN result in severe residual cumulative impacts on the highway network having regard to improvements that can be undertaken?*

Yes, since a lot of such development would be on or feed traffic onto the A6 corridor. However the issue is not purely one of capacity but of reliance on private transport and the implications for those households with limited or no access.

4.4 *What are the prospects of improvements in highway and transport infrastructure being delivered so that housing and other needs can be fully met?*

Prospects of improving highway and transport infrastructure to help deliver 479 dw pa are remote, in the context of public expenditure constraints (particularly in respect of public

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transport services) and may involve wider environmental costs. However as previously submitted it is not accepted that 479 dw pa are required to meet housing need.

4.6 ***Would a different distribution of development avoid severe highway impacts and allow the LP to meet housing needs?***

It may reduce reliance on private transport and associated traffic generation and the severity of adverse highway impacts if further housing capacity could be identified within the Urban Towns.

4.5 ***Is there justification for releasing more employment sites for housing in view of the shortfall of housing compared to employment land?***

Yes. The employment land requirement seems very optimistic. However flood risk may constrain this since housing is a more vulnerable development form.

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SESSION 4 HOUSING LAND SUPPLY

1. *Components of Housing Supply*

1.4 *Should there be a windfall allowance?*

Yes, although great care should be taken in assessing this since, in the absence of an up-to-date local plan for so long, basing this on historic rates of delivery will exaggerate future windfall supply.

2. *The Housing Trajectory and Housing Implementation Strategy*

2.2 *Is the approach to making up any shortfall in delivery over the LP period justified (the Liverpool approach)?*

Yes. As Wyre is adopting a housing requirement that even if reduced to 411 dw pa is high in relation to both historic housing delivery and the need indicated by the standardised housing methodology, it is wholly unrealistic to expect it to address the historic shortfall in only 5 years.

There is simply not the housing demand to support delivery of the estimated 604 dwellings pa required under this approach calculated on a requirement of 411 dw pa. Nor is there likely to be capacity in the construction sector to support such levels of development. Even the 5-year requirement adopted under the Liverpool approach of 495 dw pa is extremely challenging.

The perverse consequence of adopting the Sedgefield approach and Wyre forever falling short of a 5 year supply would be pressures for the release of further countryside for housing without this having any impact on future housing delivery. It would risk future development in Wyre continuing to be developer rather than plan-led.

If the Sedgefield approach is adopted then the housing requirement must be further reduced below 411 dw pa to prevent the damaging consequences of having an unrealistically high 5-year requirement in terms of delivery. To maintain the 5-year housing requirement at 495 dwellings pa (411 dw pa plus Liverpool approach to undersupply) the housing requirement would have to be reduced to 363 dwellings per annum.

3. *Five Year Housing Land Supply*

3.1 *Should a 5% or 20% buffer be used to calculate the housing land supply position?*

A 5% buffer is justified and should be applied. Wyre delivered more than 411 homes in 16/17 and is on course to do so 17/18. The Governments proposed Housing Delivery Target in the Draft NPPF defines **significant under delivery** of housing as **below 85% of the housing requirement over the previous 3 years**. This will be comfortably satisfied by Wyre 2015-2018.

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Applying a 20% buffer will have similar consequences as applying the Sedgefield approach resulting in a wholly unrealistic 5 year requirement in terms of deliverability. Liverpool plus 20% creates a requirement of 569 dwellings per annum.

3.2 ***Generally, are the assumptions about the delivery from commitments and allocations realistic?***

Considered optimistic BUT because the level of housing need/demand; the capacity of the construction sector and the commercial motivation of housebuilders to deliver at this rate are all open to question. Allocating further land for housing is unlikely to have any significant impact on overall delivery.

3.5 ***Will there be a five year supply of deliverable housing sites on adoption of the LP?***

Probably on the basis of adoption of the Liverpool approach and the assumptions on build out-rates being reasonable BUT if housing need/demand has been over-estimated or the construction sector either does not have the resources or commercial motivation to supply at this rate, **there is a significant risk that delivery will not reach the almost 500 dwellings pa required, that the backlog increases and the five year supply disappears.**

If the Sedgefield approach or 20% buffer are applied, this will almost certainly be the case.

4. **The wording of housing supply policies**

4.1 ***Is Policy HP1 clear to the decision maker? (the Council propose modifications in response to the Inspector's preliminary questions)***

Yes, and **the Council's proposed retention of adherence to the Liverpool approach in the policy text is supported** .

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SESSION 7 CORE DEVELOPMENT MANAGEMENT POLICIES

4. Natural and Historic Environment policies

4.1 Are Policies CDMP 4 and 5 consistent with national policy?

The Landscapes and Geological sites section allows for development having negative landscape effects provided these are *reduced or offset* through mitigation. It would be more consistent with policy if this read *minimised and offset*.

It would also be helpful if the policy made clear that the above provision does not apply to valued landscapes which para 109 of the NPPF requires be protected and enhanced, without qualification.

4.2 Is the definition of Green Infrastructure within Policy CDMP 4 too wide ranging?

Yes. As set out in SOSRA's representations repeated below:-

Point 5 –It is misleading and unhelpful to the effective application of this policy to suggest all countryside areas fall within the term Green Infrastructure. The second sentence should:

- 1) be rephrased to identify the specific elements within the countryside that constitute green infrastructure perhaps drawing on the Natural England definition as their guidance is still referred to in National Planning Practice Guidance and/or*
- 2) Key elements of Green Infrastructure outside settlement boundaries be shown on the Proposals Map e.g. the Millennium Way between Garstang and Scorton.*

The Local Plan already has Policy SP4 seeking to protect the open and rural character of countryside. However as the Local Plan amply demonstrates, some development of countryside is unavoidable in order to meet housing needs.

Policy CDMP 4 and the Proposals Map should be more focussed in identifying key elements of green infrastructure within countryside in order that particular protection is afforded to them, given the public benefit they afford.

Policy on the protection of Public Rights of Way currently included within CDMP 6 would be better moved into this policy since:-

- a) The latter policy is with the exception of the section on Public Rights of Way exclusively focussed on new development.
- b) Public Rights of Way are unarguably an element of Green Infrastructure and an Environmental Asset.