

Wyre Council Local Plan Examination

Hearing Session 3

Matter 3: Housing and Employment Objectively Assessed Needs (OAN) and Requirements

Hearing date : 15th May 2018

Submission on behalf of Metacre Ltd

1. This submission is made for and on behalf of Metacre Ltd concerning Hearing Session 3, Matter 3. The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (April 2018) and supplements the representations lodged with Wyre Council on the *Local Plan, Publication Stage*. The two should be read together. This submission is particularly concerned with issues 1 and 4.

Issue 1 : The Housing OAN

1.3: Should the OAN be lower taking into account the new methodology for calculating housing need proposed within the draft revisions to the NPPF?

2. The 'Right Homes in the Right Places' document published by the Government for consultation on 14th September 2017 proposed a new methodology for assessing local housing need. Paragraph 52 of the document recognised that a number of plan makers had already made significant steps in preparing their plan and stated that the Government wants to encourage them to complete their plan. It therefore proposed transitional arrangements, where if a plan is to be submitted for examination on or before 31 March 2018, or before the revised Framework (NPPF) is published (whichever is later), then the LPA is to continue with the current plan preparation.
3. The subsequent 'Government response to the Planning for the right homes in the right places consultation' document, published in March 2018, summarises the consultation responses to the question "*Do you agree with the proposed transitional arrangements*



for introducing the standard approach for calculating local housing need?”. The Government’s response, on page 13, is that:

“The Government is keen to maximise the benefits of the new standard method of calculating housing need by bringing it into effect as soon as possible. However, we recognise that a number of plan-making authorities have made significant steps in preparing plans which we want them to complete. In the revised Framework, we are proposing to introduce transitional arrangements to allow plans to be examined against the old framework, where they are submitted for examination within six months of the revised Framework’s final publication.”

4. In the consultation draft NPPF, Annex 1 ‘Implementation’, paragraph 209 states that the policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before a date which will be the date six months after the date of the final Framework’s publication. It specifically states that:

“In these cases the examination will take no account of the new Framework.”

5. Bearing in mind the above, the new methodology for calculating need within the draft revisions to the NPPF has no weight when considering the OAN as part of this examination.

Issue 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?

6. To be positively prepared NPPF paragraph 182 requires the plan to be 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. NPPF paragraph 14 requires local plans to meet objectively assessed needs with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

7. The Local Plan patently is not based on a strategy which seeks to meet the full OAN for housing and as a result is also not aspirational as required by NPPF paragraph 154, nor is it consistent with NPPF 151. This requires Local Plans to be prepared with the objective of contributing to the achievement of sustainable development and the presumption in favour of sustainable development, which includes meeting the OAN.
8. There is also no apparent support from neighbouring authorities to assist in delivering any unmet requirement. In this respect:
 - **Fylde.** The draft Fylde Local Plan which has now completed its examination is not proposing to identify the land and infrastructure required to meet the unmet need in Wyre. Furthermore, there is no proposed contingency mechanism within the Fylde Local Plan that would deal with this unmet need in the future. There is merely a suggestion that Fylde is committed to continuing to work with Wyre and its neighbours into the future. However, over the last decade Fylde has shown no urgency to address their own significant housing shortfall let alone assist neighbouring authorities. In this respect, Fylde's current Local Plan was adopted in 2003, is based on long superseded and out of date housing evidence and was only intended to cover the period to 2006. Moreover, it did not identify any housing allocations and the defined settlement limits were drawn in a restrictive manner as the strategic housing requirement over the remaining plan period had already been met by existing commitments. It has been evident for almost a decade that significant edge of settlement greenfield development is required in Fylde if the Borough's housing needs are to be delivered, with the Fylde's March 2007 LDS proposing the production of a replacement Plan in July 2007. Despite this, the Preferred Options Local Plan was not published for consultation until June 2013 and the draft Plan was not submitted for Examination until December 2016. Furthermore, and despite having a severe shortfall in housing, a significant proportion of the committed development in the Borough had to obtain permission by appeal. Consequently, Metacre has no faith that Fylde will undertake an early review of their Local Plan or make any realistic attempts to help address Wyre's difficulties.
 - **Blackpool.** They have restricted development opportunities due to boundary constraints and thus are unlikely to be able to assist.



- **Preston and Lancaster.** These authorities are not within the same identified housing market area as Wyre and it is understood that neither have offered assistance. Indeed it is understood that Lancaster has requested assistance to help meet part of their housing need.
9. To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. The Council suggest that that it would be preferable to have an adopted local plan even if it does not deliver the full OAN and that delaying further adoption until an agreement is reached with neighbouring authorities would delay delivery of 86% of the OAN. However, as no neighbouring authority is currently prepared to assist Wyre the preferable strategy would be for Wyre to include additional housing allocations in the Plan. In this respect, consideration should be given to Metacre's representation to Policy SA3/3 which identifies an extension to allocation SA3/3 at Great Eccleston, which could help deliver more of the Borough's OAN.

4.2 : Are the highway constraints overstated?

10. Metacre cannot comment on the stated highway constraints across the entire Borough, however, it is considered that highway constraints in the vicinity of Great Eccleston are overstated.
11. Metacre's representation to policy SA3/3 of the Publication Draft Local Plan included, as an appendix, a Traffic and Transport Note prepared by Curtins. This commented on issues relating to the local and wider highway network in the vicinity of Great Eccleston.
12. With regards to the wider highway network, Curtins highlight how the LCC Highway report ED094a includes an overview of the Great Eccleston sites and in the section which refers to '*congestion on known strategic pinch points*' the document mentions the M55 Junction 3. Curtins demonstrate how this Junction is currently operating within theoretical capacity, albeit some arms operate over capacity during the traditional AM and PM peak periods. However, Curtins highlight how Highways England have recently secured £800,000 for improvements which would unlock additional capacity at the junction, which are anticipated to be delivered by Spring

2019. Furthermore, the junction is expected to benefit from the Preston Western Distributor (PWD) road which was approved on the 4th October 2017 and is scheduled to be completed by 2021, as well as the A585 bypass. By the end of the plan period the PWD could result in traffic decreases of circa 4,700 trips per day through junction 3.

13. Curtins consider that LCC highways do not fully take into account these major highway improvements and that the M55 Junction 3 is not the key constraint to Great Ecclestone that the LCC report suggests it is.
14. Furthermore, and as expanded upon in Metacre's response to Session 11, Matter 8, Issue 2.1(vi) of the Examination Hearing Sessions, an extension to allocation SA3/3 would not have any severe impacts on the local highway network around Great Ecclestone.

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?

15. The shortfall of 1356 dwellings between the OAN and the Local Plan equates to AM and PM traffic flows of circa 800 two-way movements (based on industry standard calculations using the TRICS database). This is a relatively minor amount of traffic that would disperse across the wider network in multiple directions from a variety of sources, thus further minimising any impacts. To put this into some context, DfT traffic counts on the A586 alone indicate existing traffic flows in the order of 28,000 vehicles per day.
16. As highlighted in response to question 4.2 above, with regards to Great Ecclestone the identified ceiling to residential development appears to be based on a pinch point at the M55 J3. However, Curtins highlight how Highways England have secured funding to deliver improvement which would unlock additional capacity at this junction, whilst the Preston Western Distributor road could result in traffic decreases of circa 4,700 trips per day through this junction.



17. Accordingly, whilst parts of the highway network are obviously more constrained than others, Great Eccleston is well placed in a sustainable area where the highway network is either operating within capacity or is due to benefit from improvements in coming years. It is considered that an increase in the amount of housing proposed at Great Eccleston to help deliver the OAN, via an extension to allocation SA3/3, would not result in severe residual cumulative impacts on the highway network.

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?

18. With regards to Great Eccleston, the prospect of the Preston Western Distributor Road, A585 bypass and M55 Junction 3 improvements coming forward is good and all three schemes are moving towards construction in the next couple of years. This is well within the plan period and therefore the benefits associated with these schemes should be fully considered.

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

19. Parts of the highway network are obviously more constrained than others and thus the distribution of development does play an important role in determining highway impact. Sites which are situated away from congestion hotspots or in areas where mitigation is proposed should be prioritised over other sites. Great Eccleston and Inskip are such locations.