1. Cass Associates is presenting this Statement on behalf of Redrow Homes who have an interest in land bounded by Stanah Road and Underbank Road at the eastern edge of the built up area of Thornton.

2. We have argued in relation to Matter 2 (Strategy and Strategic Policies) that the assessment of available land to meet housing needs should seek to optimise (or increase) the allocation of land for housing around the main urban towns. We have also argued in relation to Matter 3 (Housing and Employment OAN and Requirements) that, taking the aims and objectives of the Local Plan in the round, there is a case which supports a strategy which meets the housing OAN in full and could even support a higher OAN figure.

3. If it is found that either the housing OAN should be met in full or that a higher OAN is justified, or that the green belt boundary should remain as it is, then the process of identifying suitable alternative sites for housing will need to be re-engaged. With this in mind we have promoted land at the eastern edge of Thornton (land at Stanah Road) as a compelling additional location for housing.
4. The process of assessing the suitability and screening of sites in and around the main urban areas of Fleetwood, Thornton and Norcross as set out in the SHLAA (reference ED089) seems reasonable. It is a multiple stage process. At stage 1 sites have been assessed against a series of fundamental parameters. This has resulted in an initial sieving and the elimination of a number of potential locations for new development. The stage 1 parameters include:

- Green belt
- Location
- Scale
- Recreation sites
- Current use
- Flood risk

5. Those sites that pass through the initial assessment have then been subject to a more robust stage 2 review which accounts for other matters including:

- Character of area
- Land use conflicts
- Planning status and policy constraints
- Heritage features
- Ecology features
- Environmental matters
- Site access
6. Surviving sites from stage 2 have then been subject to the tests of availability and achievability to result in a list of suitable development sites. For the larger sites in Thornton which are seen as suitable, a common constraint is identified – consideration of wider highway impacts of development, including the possible need for new highway infrastructure to overcome existing constraints on Skippool Road. This constraint has not been used to distinguish one of the larger sites from another.

7. In the context of the SHLAA the land at Stanah Road, Thornton is included as part of a parcel of land with reference THN_31. This large parcel has been assessed as a whole. It is around 21.46 ha in extent. The SHLAA assumes a net developable area of 12.88 ha and a yield of 386 houses. Redrow Homes has an interest in the northern section of this land parcel and has made its representations to the different stages of Local Plan preparation on this basis. Its interest is in an area of land which extends to around 6.8 ha and which is clearly contained or defined by Stanah Road on its western and northern boundaries and Underbank Road along the eastern boundary.

8. The SHLAA concludes that the whole of land parcel THN_31 is suitable and available for development. In the more detailed assessment of this site the SHLAA identifies potential constraints that will need to be addressed. Redrow Homes has recognised that it is important to demonstrate that any development will be deliverable. With this in mind its representations to the Publication Draft Local Plan included assessments of flood risk, transport and ecology. In response to the potential constraints identified in the SHLAA.

1. Proximity to the River Wyre (SSSI, SPA and Ramsar designations) : The ecological appraisal concludes that there will be no adverse effects on the Morecambe Bay SPA, SAC and Ramsar site and the Wyre Estuary SSSI.
2. Three TPOs on the western and northern boundaries together with ponds, trees and hedgerows on the site: The representations by Redrow Homes included an illustrative framework plan to show how new development can be progressed in a way that incorporates existing trees, hedgerows and ponds.

3. Raikes Farmhouse (Grade II listed): This is not close to the area where Redrow Homes have an interest.

4. Electricity pylons: This is not an overriding constraint. The illustrative framework plan shows how the site can be developed in a way that accommodates the corridor of the electricity lines.

5. Transport and traffic: The Transport Assessment shows that the projected impact of the development generated traffic on the surrounding area is acceptable. All junctions within the study area are forecast to operate within capacity (with and without development) with the exception of the Skippool roundabout where improvement works are planned in any event.

**Overall**

9. The Local Plan is not positively prepared or justified as it does not seek to meet objectively assessed needs for housing and it is based on a strategy which underplays the opportunity for urban extensions at the most sustainable locations for development, including the main town of Thornton.