



**Representations to Wyre Local Plan:
Statement on Matters 2,3 and 4– April 2018
On behalf of Ireland & Platt**

The following Statement is made on behalf of our client, Ireland & Platt, in response to the Inspectors' Matters, Issue and Questions relating to the Wyre Local Plan Examination. We wish to be involved at the Examination Hearing Sessions when relevant matters are being discussed.

Matter 2 – Strategy and Strategic Policies

Issue 5 – Green Belt

5.3 Is there a justification for the removal of more land from the Green Belt e.g. land at Norcross Lane?

Insufficient assessment has been made of the Green Belt in the context of releasing sites for development. A further stage of assessment should be undertaken to assess whether existing Green Belt land can be made available for further development to allow the authority to meet the Objectively Assessed Need for housing in the Plan Period and also to provide for Safeguarded Land beyond the plan period. Paragraph 83 of the National Planning Policy Framework (NPPF) is clear that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The authority have accepted this and sought to review the Green Belt, however, the review is insufficient to

deliver a sound Plan, lacking vital evidence to provide a positively prepared plan, also failing the tests of being justified and consistent with national policy.

Paragraph 4.1.9 of the Local Plan states that "with regards to the majority of the main urban areas on the peninsula which benefit from a wider range of services and facilities than the rest of the Borough, there is a limited amount of undeveloped land or other previously developed land available for development outside the designated Green Belt. In view of that, the Council undertook a local review of the Green Belt in Wyre to ascertain whether there were any parts of the Green Belt that could be released." Further to this, the Council's Response to the Inspector's Preliminary Views on Matter and Issues states at paragraph 18 that the Green Belt Review was undertaken to ensure that sustainable opportunities for meeting development needs were maximised. It then however firmly clarifies that the Green Belt study is an objective assessment and was not driven by the need to find land for development. Other evidence base documents however demonstrate that this was either not the case or the review does not adequately address the matter.

The Green Belt and Strategic Areas of Separation Background Paper (January 2018 Update) details that although a small percentage of the Borough is in the Green Belt, its focused location around the main urban areas means its right to consider its potential to meet housing need. Paragraph 4.3 then states that "even if the development needs of an area can be met without Green Belt release, consideration would still need to be given as to whether releasing Green Belt land may produce a more sustainable planning outcome within the area." Interestingly, section 8 of this document refers to public consultation, but provides no details whatsoever of any consultation on the Green Belt review, its methodology or outcomes. There was no stakeholder or public involvement in the assessment.

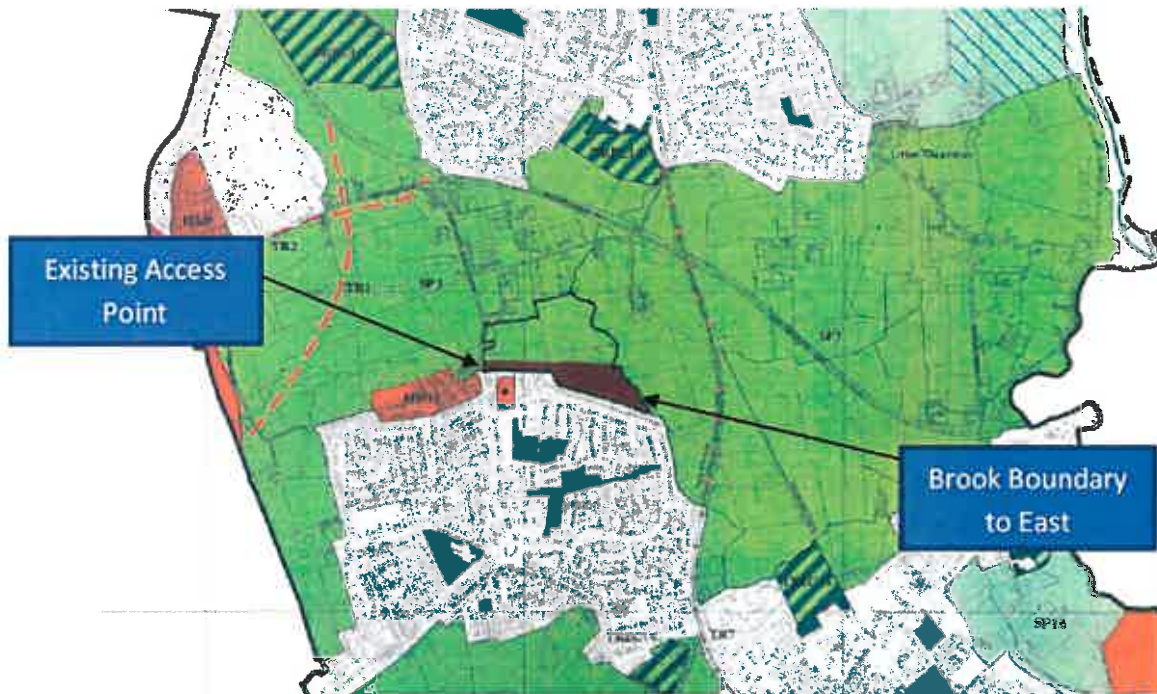
A summary of the authority's position appears to be that it is right to review the Green Belt boundaries in the location most suitable for delivering sustainable development with a view to finding housing land, but that the review of said Green Belt was not undertaken in this way. The Green Belt Review therefore clearly does not go far enough in seeking potential development sites, and is certainly not sufficient an assessment when the authority is not

proposing to meet the objectively assessed need for housing. In light of this, and acknowledgement that the green belt around the main urban areas provides for a more sustainable form of development, the Council should review the Green Belt in the context of actually looking for sites for development, to meet the OAN, providing sustainable locations for development. Locating development in these locations, closer to the main service area, can also have less impact on trip generation than providing development in other locations in the Borough, potentially allowing for more homes to be built within the restriction of highway concerns. The Council has failed to properly assess the true availability of land within the district, and has accepted this situation in the context of the Green Belt Review, and its evidence base is therefore flawed.

In effect, a second stage Green Belt Review should be undertaken, with an accordingly updated methodology, in order to find sufficient sites that may be removed from the Green Belt under exceptional circumstance.

By way of an example, we have submitted details ~~XXXXXXXXXXXXXXXXXXXX~~ to the Council throughout the Local Plan process, identifying it as a potential site that could meet housing need, subject to a Green Belt Review. The site lies to the north of Carleton, which under the Council's assessments forms part of the Poulton-le-Fylde urban area. We have also made submissions objecting to the methodology for undertaking the Green Belt review in relation to the sites proposed for release and also its lack of public or stakeholder consultation.

The plans below shows a boundary around ~~XXXXXXXXXXXXXXXXXXXX~~ an example area of land that we consider should be considered within a Green Belt Review that is looking to provide sustainably located sites for housing to meet the OAN and Safeguarded Land beyond the Plan Period.



Matter 3 – Housing and Employment OAN and Requirements

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?

No. The insufficient Green Belt Review highlighted above is one example of how the authority has failed to adequately address housing need in the plan period and longer term through safeguarded land.

It is also unclear to what extent the authority has sought to address highway constraints, for example through the location of development, the types of housing or sustainable transport options.

4.2 Are the highway constraints overstated?

Any Highway issues are constraints, but cannot be seen as barriers to development. The Local Plan and development it prepares for should assist in alleviating existing highway problems through detailed considerations of available options and where necessary securing funding for any infrastructure works that may be required associated with a particular development or area.

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

Providing more development to the existing urban areas, for example by reviewing the Green Belt to consider sites for development, would result in less trip generation than development in less sustainable locations in the Borough.