



## **Representations to Wyre Local Plan**

### **Statement on Matter 1 – April 2018**

#### **On behalf of M Capital Development Ltd and TNPG Sandeman**

#### **Matter 1 – Legal Compliance, Procedural Requirements and the Duty to Cooperate**

##### **Issue 2**

#### **2.1 - Is there evidence that the Council has cooperated effectively with adjoining authorities in seeking to meet any unmet housing needs from the District?**

We previously made representation to the authority in November 2017 to make them aware of a proposal immediately adjacent to the district boundary, to the north, off Junction 33 of the M6 within Lancaster district. We provided this information to inform the authority of our pre-application discussion and local plan representations with Lancaster to inform dialogue with Lancaster district as both authorities move towards submission of their respective plans; and on the understanding that both authorities have asked each other whether they can meet some of their housing need. A copy of this letter is attached.

The authority's response to our submission, detailed in the response table, simply noted the submission. The Statement of Compliance with the Duty to Cooperate document includes meeting notes between the authorities. At a meeting on the 21<sup>st</sup> February, Lancaster indicated that they would be unable to assist in meeting unmet need as there are no sites on the border between the authorities. Lancaster also state that they cannot assist Wyre because they are struggling to meet their own OAN. *"It is more an issue of capacity and build out rates than*

*available land. None of the site can come forward without support from infrastructure providers”.*

At a subsequent meetings on the 14<sup>th</sup> July 2017 the site was raised by Lancaster as a recent pre-app in Lancaster. *“Not considered sustainable or supported but if allowed this could go some way to meeting Lancaster’s shortfall, and potentially Wyre’s.”*

At a meeting on the 14<sup>th</sup> November 2017, Wyre noted that they had received a representation for a large scale residential development in Lancaster. With the meeting notes stating this will be a matter for Lancaster.

Since November 2017 we have undertaken assessments in preparation of an application, looking at Flood Risk, Transport issues and Landscape, Ecology, Infrastructure and Heritage matters.

On 21st December 2017, the site owners submitted an Environmental Impact Assessment Scoping Request (Local Planning Authority Ref: 17/01582/EIO). A Scoping Opinion was provided by the Local Planning Authority on 7th March 2018.

The Opinion was provided following a considerable consultation process involving 24 consultees, many of which responded and a number of topics were identified for investigation and assessment. The Local Planning Authority agreed with the proposed Scope of the ES and offered guidance on some other matters. Key topics identified are Landscape and Visual Impact, Ecological Matters, Highways and Transportation and Air Quality.

At the time of this submission, evidence gathering and assessment on these topics continues and the owners are preparing a Level 3 Pre-Application submission to Lancaster District Council which entails further dialogue with officers and a forum with Councillors.

In a strategic context, the site is ideally located in an area of Lancaster district identified for considerable growth, underpinned by infrastructure Improvements. The District of Lancaster Highways and Transport Masterplan (<http://www.lancashire.gov.uk/media/899614/final-lancaster-highways-and-transport-master-plan.pdf>) proposed a series of measures to increase capacity on the road and public transport networks including: reconfiguration of Junction 33 of the M6, the Lancaster Reach Rapid Transit Service and other 'superhighway proposals' along the A6 corridor. Opportunities therefore exist for direct and indirect contributions to, and enhancement of, the infrastructure measures identified in the Masterplan. This may be by way of developer contributions (through CIL for example) or through providing a customer-base for services such as Lancaster Reach Rapid Transport service, thus contributing to viability from the time of opening.

The Representors consider that despite both Wyre Borough and Lancaster District currently being unable to adequately address OAN in their respective Local Plans and the Home Farm, Ellel site being presented on more than one occasion as a deliverable site capable of yielding circa 800 dwellings, they have together failed to adequately consider it. It follows that the Council has not cooperated effectively with Lancaster District in seeking to meet unmet housing needs.



17/L/024

2<sup>nd</sup> November 2017

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Dear Sirs,

**RE: Wyre Local Plan 2017 (Publication Draft) Consultation Response  
Land Home Farm, Ellel, Lancaster – On behalf of M Capital Development Ltd and TNPG  
Sandeman Trust.**

Please accept this letter as a response to the above consultation following publication of the draft Wyre Local Plan.

This consultation is of interest to my client as whilst their site lies within the administrative district of Lancaster, they are currently promoting a significant development proposal that immediately abuts the boundary with Wyre Borough and the potential to impact upon it.

Please find enclosed with this letter a Land Promotion Study for the site known as Home Farm, Ellel. The site has been promoted as a new village that could accommodate in the order of 800 dwellings and commercial floor space in the form of a hotel, leisure, employment and retail floorspace and is currently being assessed by officers of Lancaster City Council prior to publication of its draft Local Plan towards the end of this year. It is also my clients' intention to submit a planning application (or applications) for the site in early 2018. It therefore appears appropriate that Wyre Borough Council is made aware of this proposal this stage.

We note with interest within the Publication Draft Wyre Local Plan (PDWLP), the reference to the Duty to Co-operate and in particular the discussions held with Lancaster District (Para 1.4.4) over the possibility of assisting Wyre in meeting its Objectively Assessed Need (OAN) for housing and the response that Lancaster District has itself requested assistance of Wyre. This is clearly a difficult situation that has the potential to exacerbate a housing supply shortage in both administrative districts.

The difficulty in achieving the OAN for housing in Wyre is writ large throughout the PDWLP as highway capacity and, to some degree flood risk constraints, appear to dictate that large areas of the District are not capable of significant further housing growth. It is understood that if the policies of PDWLP are implemented and housing sites delivered on this basis, that only 86% of the OAN can be realised. This would appear to leave a shortfall, even on this optimistic basis, of the region of 1356 dwellings.

Lancaster District is also facing issues in terms of current and future housing land supply and it recognises that at present, it has in the region of 2.2 years of housing land supply. The District is

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also constrained in terms of developable land by issues such as flood risk, protected landscapes and Green Belt and as such land south of Lancaster has been identified for significant growth, primarily through the provision of around 3500 dwellings at Bailrigg Garden Village (BGV).

It is important to point out that Home Farm, Ellel is not promoted as a competitor for BGV but as an additional strategic site in the Lancaster Local Plan that can meet a need in the short term as it is an eminently deliverable housing site, unconstrained by factors such as those mentioned above. Our planning application will be predicated on that basis.

We note the highways constraints within Wyre and the work undertaken by LCC to assess capacity issues. It appears that access to the A6 from the M6 (junction 33) is not a factor that may constrain growth and that the north of the Borough is relatively accessible in this regard. We have engaged with both LCC and Highways England who have confirmed that this is the case.

This letter is therefore submitted in order to make Wyre Borough Council aware of this proposal and its potential to deliver 800 or so dwellings on the border of Wyre in the short term. We trust it is useful and is able to inform positive dialogue with Lancaster District as both authorities move towards submission of their respective Local Plans.

Please do not hesitate to contact me should you require any further information about this project as it moves towards a planning submission. My clients and I would be more than happy to meet officers of Wyre to discuss this more fully.

Yours sincerely,

A black rectangular redaction box covering the signature of Paul Tunstall.

**Paul Tunstall MRTPI**  
Director

cc: Paul Hatch, Planning Policy, Lancaster City Council. (by email)