

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 1: Legal Compliance, Procedural Requirements and the Duty to Cooperate****Issue 1: Compliance with procedural requirements including consultation/participation procedures**

1.1 Is there any evidence that the Council has not met the minimum requirements for consultation and that consultation and publicity has otherwise been inadequate?

1.1.1 Despite the fundamental role fulfilled by supporting LCC highways evidence, this evidence has not been subject to formal consultation through the plan preparation process. Not all the documents/studies forming part of this assessment have been made available for review/comments. The LCC Document that has been made available, 'Implications for Housing Developments within the Proposed Wyre Local Plan' does not include the technical analysis upon which their 'Desktop Assessment' is based, from which their conclusions are made. In fact, LCC have described the limitations of the modelling work so that for the Poulton-le-Fylde area, they are not a forecasting tool or are 'rudimentary' without the ability to reassign and test new developments or highway improvements. The lack of opportunity to review and comment on this evidence raises significant questions about the transparency of this process. As a result, it is unclear whether this evidence is robust in providing the justification for capped housing delivery across the Borough and at individual settlements.

Issue 2: Compliance with the DtC, particularly in relation to consideration of housing needs

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

2.1.1 The Duty to Cooperate Statement illustrates that the Council has met regularly with its neighbouring authorities in discussion of cross-boundary strategic planning matters including housing. The Duty to Cooperate Statement confirms in our Client's view that the legal requirement has been met. Our Client is however concerned about the effectiveness of this exercise in relation to housing delivery.

- 2.1.2 Wyre is one of three local planning authorities which make up the Fylde Coast Housing Market Area (Wyre, Fylde and Blackpool). Plan preparation in the Fylde Coast commenced with the publication of the Fylde Coast Strategic Housing Market Assessment 2013 (as updated in 2014) and was to form the basis of the Local Plans for the authority. This joined up approach to plan making however did not last, as each authority adopted a different timeframe for the adoption of the Local Plan. Blackpool were the first to be examined and adopted in January 2016. The Fylde Local Plan is at examination and is expected to be adopted shortly.
- 2.1.3 The departure from this joined up approach has resulted in a patchwork of evidence across the housing market area. The Blackpool Core Strategy for example 2012 was based on the Sub National Population Projections and Oxford Economic Forecasts, this contrast with that of the revised position within the Fylde Local Plan which is based on the 2014 SNHP and an averaged position across the three major forecasting houses, whilst the Wyre Local Plan which is based on the 2014 SNHP and Experian Economic Forecasts. This has severely complicated the assessment of how responsive these plans are in responding to development needs within the Housing Market Area, and also where this housing growth should be met if evidenced as undeliverable.
- 2.1.4 The lack of co-ordination across the housing market area has resulted in a challenge to effective cross boundary planning. This has led to tensions within the housing market area with Wyre submitting detailed objections to the Fylde Local Plan on account of their arising housing shortfall. Despite this attempt, the Inspector for the Fylde Local Plan was not convinced due to the evidence base illustrating the housing needs of Wyre being incomplete.
- 2.1.5 Fundamentally the result of this process is the emerging shortfall in housing supply which has no solution to secure its development needs. As such whilst there has been a certain level of engagement within the Fylde Coast Housing Market Area, the result of this engagement has been far from effective with no answer to the question as to how Wyre's housing need is to be met.

2.3 Is there evidence that Wyre have cooperated effectively with Lancashire County Council (LCC) on relevant issues such as transport and education infrastructure?

- 2.2.1 Our Client's concern in relation to this matter is not a question of whether engagement has taken place between LCC and the Council, but rather the approach taken for this engagement and the subsequent actions taken by the Council further to the discussions with LCC.

- 2.2.2 Our Client considers that Highways constraints should have been assessed early on in the plan preparation process in order for these issues to be better understood, the information to be more robust, and the implications of this to be more positively planned for.
- 2.2.3 The Highways Capacity study informing the Local Plan is from 2016, just 2 years prior to submission, meaning that resulting information could not be actioned upon effectively by the Council or its partners. Wyre Council has been engaged in the preparation of a new local plan since 2011. However, the highways evidence underpinning the submission version of the Local Plan was not prepared for another 5 years. Whilst acknowledged that it was not until 2015 before the Issues and Options for growth and full housing needs became clear, the capacity of the Borough's road network should have been assessed to inform the preparation of the Local Plan so that necessary infrastructure could be planned for and, if necessary, neighbouring authorities engaged to accommodate unmet needs.
- 2.2.4 Beyond this, our Client is unconvinced that the Council has undertaken sufficient scrutiny of LCC's evidence illustrating highways constraint in the District and the absence of potential infrastructure which might be secured to address this and enable the full housing needs of the District to be delivered. The concerns of our Client with this evidence are summarised within our Matter 3 Statement and Publication Local Plan representations.
- 2.2.5 The Council appear all too willing to accept the case of highway constraint identified without alternatives being considered. There is no evidence that the Council has sought to test the robustness of this evidence in anyway to understand whether the model is sufficiently robust or whether growth could be accommodated in other ways within the plan area.
- 2.2.6 Indeed the evidence of highways constraint has had a significant influence on the distribution of development set out by the Council within the Local Plan. This includes the application of caps for housing delivery at each settlement within the Borough. This evidence was produced late on in the plan preparation process and after the Council had developed and consulted on its spatial options.
- 2.2.7 Our Client does not believe that the Council has considered potential new infrastructure sufficiently to overcome this constraint. The issue of a new junction on the M6 at Garstang is a perfect example of this with the Borough Council signing an agreement with Highways England not to pursue this. In our Client's view this agreement does not represent positive or aspirational plan making. It is noted that in Lancaster, the publication Local Plan seeks to relocate Junction 34 of the M6 to enable the delivery of 3,500 dwellings. Similar investments

are made within the Preston Local Plan with the development of a new Junction on the M55 to unlock development potential to the North of Preston.

- 2.2.8 Highways England are currently consulting (up to 8th May 2018) on improvements to the A585 from Windy Harbour-Skipool at Little Singleton. This scheme is expected to be subject to a planning application in October 2018 and start on site in 2020/2021. The aims of this scheme are to improve journey times, road safety and 'supporting the economic growth potential in both Wyre and Fylde and supporting planned residential developments in the local area'. There is no evidence presented by LCC as to how this scheme would improve highway operation in the area and therefore release development potential.
- 2.2.9 Beyond this, little regard has been given to potential for development to be focussed towards more sustainable and accessible locations where residents would not need to rely on the car for travel. Furthermore, the Council have failed to consider evidence of travel patterns within the District which clearly indicate that development could be sited within the District to avoid problem areas and to respond to travel demand needs.

Issue 3: The SA and its consideration of reasonable alternatives

3.1 Does the SA meet statutory and legal requirements in relation to the assessment of reasonable alternatives?

- 3.1.1 Our Client holds concerns about the extent and approach of the assessment undertaken by the Council through the Sustainability Appraisal. These concerns are related to the housing requirement and spatial options for distribution.
- 3.1.2 There is no assessment within the SA of the housing requirement and potential reasonable alternatives to the housing requirement. As such, it is unclear what impact on sustainability objectives the proposed housing requirement will have, including the failure to meet the assessed level of housing need, or provide a housing requirement that supports the economic growth aspirations of the Council.
- 3.1.4 In relation to Spatial Options, the SA provides very little justification for the assessment reached for each spatial option against sustainability objectives. There is no readily available information which sets out in real terms what options 1, 2, and 3 of the SA actually mean in relation to the planned requirements. There is also no explanation of the assessed outcome

for each sustainability objective for any of the spatial options. As a result, it is unclear how the conclusion made has been arrived at.

3.1.5 The lack of this detail means that it is far from clear whether the 'hybrid' spatial approach forming the basis for the distribution of development within the Local Plan, reflects the 'dispersal' approach (option 3) as claimed by the Council, or whether this is consistent with the settlement distribution set out within the Local Plan which is derived based on highway capacity information. It is therefore unclear whether the SA has assessed the spatial approach adopted within the submission version Local Plan in relation to sustainability alternatives.

3.1.6 In response to the above there is a need for the Council to review its SA to ensure that it adequately meets the legal requirements and provides an effective assessment of the potential implications of the adoption of the Local Plan. This review should consider:

- An assessment of the housing requirement and reasonable alternatives against sustainability objectives. This should include as minimum:
 - 292 dpa (SNHP 2014)
 - 411 dpa (proposed housing requirement);
 - 479 dpa (assessed OAN); and
 - 560 dpa (affordable housing need led).
- A review of the assessment undertaken for spatial options 1, 2, and 3, defining these spatial options in context of the overall plan targets, and setting out in greater detail the Council's justification for the conclusion made against sustainability objectives; and
- Provide an assessment of the "hybrid option" adopted by the Council as the basis of its spatial strategy against sustainability objectives.

Issue 4: The Local Plan Timeframe

4.1 Is the timeframe of the LP appropriate (2011-2031)?

2.1.1 Our Client does not consider that the plan period provided by the submitted Wyre Local Plan is appropriate. The reasoning for this is connected to plan deliverability/effectiveness and positive plan making.

2.1.2 Upon adoption (likely in late 2018/early 2019) the Wyre Local Plan will provide just a 12-year post adoption period. This period is shorter than preferences set by the Government in

Paragraph 157 of the NPPF. Its adoption will also mean that the achievement of the plan requirements, spatial objectives, and aspirations for the plan will be difficult to achieve. The submitted housing trajectory already suggests that the Council will struggle to meet its housing requirement within the plan period, relying on elevated rates of delivery on sites allocated through the Local Plan.

- 2.1.3 The short timescales of the plan increase the challenges for the Council in ensuring the deliverability and effectiveness of the Plan. The constrained timescale of the plan will hold the plan open to a greater risk of failure should parts of the plan not come forward as envisaged. The post adoption period of only 12 years, serves to constrain the flexibility available to the Council to respond to potential issues which might emerge over the plan period such as non-delivery or unforeseen economic change.
- 2.1.4 Our Client considers that it makes little sense to plan for a period which commenced preparation 8 years ago. Matters which occurred in 2011 have long since passed and is a limited relevance to this Local Plan. The evidence supporting the housing requirement commences in 2014, as such the consequences of over or under delivery experienced within this period will be accounted for within the projection, together with market signals. Our Client considers that the Council should seek to plan forward in a positive manner, ensuring that up-to-date evidenced needs can be achieved in full.
- 2.1.5 In response to the matters considered above and provide for a 15-year post plan timeframe, the Council should revise their plan period to 2014-2034, adjusting the proposed plan requirements, allocations and commitments accordingly.

4.2 Is the start date of 2011 consistent with the evidence base?

- 2.2.1 As set out in response to Question 4.1, it is evident that the plan period fails to align with the evidence base which is used by the Council to justify its housing requirement. The evidence used to underpin the housing requirement is the 2014 Sub-National Household Projection. This projection principally covers the period 2014 – 2039. As such the evidence used to define the housing requirement commences three years post the start of the plan period and does not reflect the requirements of the first three years of the plan. Given that the start of the plan period was now 7 years ago and is not covered by the evidence base supporting the Plan, our Client considers that the plan period start date should be revised to 2014.