

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 9: Infrastructure and Delivery****Issues 3, 4 and 5: General Response**

- 1.1.1 Policy SP7 should confirm that strategic infrastructure required to facilitate delivery of development and secure its sustainability will be treated by the Council as a priority. As such, should site specific viability illustrate that other policy requirements of the Local Plan cannot be achieved without harming the viability of the development, the Council should negotiate these requirements with applicants, with the aim of securing this infrastructure and the delivery of housing.
- 1.1.2 Policy SP7 would suggest the opposite approach with a lesser contribution sought towards infrastructure following site-specific issues and policy requirements. If implemented this approach could harm the deliverability of the Plan and sustainability of the Borough, lead to increased public expense and/or increase the prospect of challenge by developers where infrastructure is sought from schemes which do not relate to this.
- 1.1.3 An amendment to the Policy in reflection of the above is required to ensure the soundness of this part of the Policy.
- 1.1.4 A further notable omission from Policy SP7 of the Local Plan is a commitment by the Council to ensure that requests for infrastructure contributions are consistent with all necessary tests as set out in Paragraph 204 of the NPPF, namely:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 1.1.5 Listing these requirements is not necessary to confirm the soundness of this policy, however reference to these tests and the application of these tests should be made. A modification to Policy SP7 is therefore required consistent with this approach.
- 1.1.6 Connected to the above is the pooling of infrastructure contributions as restricted by CIL regulations. The Council must ensure that in planning its infrastructure, contributions for each

piece of infrastructure is not taken from more than five developments. This legal requirement further confirms the need to ensure that requests for contributions is made connected to the relevant developments, and that policy is sufficiently flexible to ensure that potential contributions towards this infrastructure can be provided by relevant developments. In response, greater detail is necessary within the supporting Infrastructure Delivery Plan in order to confirm the deliverability of the Infrastructure which is listed to ensure the sustainable delivery of the Local Plan.

1.1.7 As set out in our representations to the publication version of the Local Plan, the effectiveness of the Infrastructure Delivery Plan could be improved by adopting the following measures:

- Set out the infrastructure listed within the plan which are most critical in securing the delivery of development proposed through the Wyre Local Plan;
- Provide greater clarity on the cost of infrastructure, and timescales for delivery;
- Set out infrastructure according to the scale that it relates. Is it strategic (i.e. Borough or regional), settlement based (if so which town), or site based (if so which site). The presentation of infrastructure aligned to each settlement of the Borough would also aid legibility of the Infrastructure Delivery Plan.