



Hearing Statement – Matter 2 (Strategy and Strategic Policies)

Wyre Local Plan Examination – Wainhomes (NW) Ltd

EP Project Ref: 17-366

Project : 17-366
Site address : Matter 2 Hearing
Statement – Wyre Local
Plan Examination
Client : Wainhomes (NW) Ltd
Date : April 2018
Author : Stephen Harris

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited trading as Emery Planning.

Contents:

1. Introduction	1
2. Issues	1

1. Introduction

- 1.1 Emery Planning is instructed by Wainhomes (NW) Ltd to attend the Local Plan Examination. We submitted representations to the Publication Draft Wyre Local Plan (September 2017) in November 2017.
- 1.2 This Statement addresses Matter 2 (Strategy and Strategic Policies) and it is structured in accordance with the Inspector's MIQs.

2. Issues

Issue 3: Settlement boundaries and countryside

- 2.1 With regard to Policy SP4, reference to the protection of the countryside 'for its own sake' at Point No. 1 should be deleted. This is not consistent with the NPPF, which only seeks to protect 'valued landscapes' (paragraph 109) and emphasises the need for a positive development strategy within rural areas, which has been reflected through numerous appeal decisions.
- 2.2 There is no justification for the protection of the countryside 'for its own sake' and this should be deleted from the local plan.
- 2.3 With regard to the conversion of buildings at Point Nos. 4 and 5, the criteria listed goes far above and beyond what is envisaged through national planning guidance and what is allowed through permitted development rights (e.g. Part 3 Class Q of the GPDO 2015 as amended). Furthermore, the approach advocated would be significantly more restrictive than what is permissible within the designated Green Belt. In order to ensure that this policy meets national planning guidance and reflects permitted development rights, we would suggest that the policy is revised such that it is permissive of the conversion of existing buildings where the building is of permanent and substantial construction.

Issue 5: Green Belt

5.1

- 2.4 We have set out through our previously submitted representations (November 2017) what we consider the exceptional circumstances to be to justify alterations to the Green Belt boundaries with due regard for paragraphs 82 to 85 of the NPPF.

- 2.5 The justification for changes to parcel nos. 2, 20 and 21 (as per the Green Belt Study 2016) is set out by the Council within the context of irregular boundaries or the need to secure a new car park through the allocation of SA1/8. With regard to the latter point, there does not appear to be justification provided within the evidence base that: a) SA1/8 is necessary in its current form in order to deliver a new car park; b) Whether there are alternative ways in which a new car park could be delivered near to the town centre.
- 2.6 The underlying purpose behind a Green Belt Review should be to meet the full OAN in accordance with paragraph 47 of the NPPF; the constrained approach to the release of land for housing has not been properly justified as set out through our previous representations.

5.2

- 2.7 We consider that land within the designated Green Belt should be released in order to meet the full OAN in accordance with paragraph 47 of the NPPF; again, the constrained approach to the release of land for housing has not been properly justified as set out through our previous representations.
- 2.8 The release of parcel nos. 2 and 21 (as per the Green Belt Study 2016) does not appear to meet any development needs of the Borough. The first parcel would be incorporated into an area of 'green infrastructure' whilst the latter would comprise 'white land' and it is not understood what this parcel of land would be utilised for in order to meet the needs of the Borough in a sustainable manner.
- 2.9 We have set out through our previous representations (Section 8 and EP10-EP13) our justification for the release of our client's omission site at Normoss Road, Poulton-le-Fylde in order to meet housing needs.

5.3

- 2.10 As per our previous representations and as set out above, additional land should be released in order to meet the full OAN in accordance with paragraph 47 of the NPPF.
- 2.11 We set out through our previous representations that the Green Belt Review 2016 is not sufficient with regard to our client's omission site at Normoss Road, Poulton-le-Fylde (see Section 8 and EP10-EP13 of our representations November 2017). The review of our client's site as part of a very large parcel of land (Parcel no. 24) is far too generalised and does not provide an informed

assessment as to its merits in terms of paragraph 80 of the NPPF. Our client's site does not appear to have been assessed as a potential housing allocation through any of the evidence base supporting the local plan and it is not included as a reasonable alternative site through the Sustainability Appraisal.

2.12 Further to our previously submitted detailed representations and the supporting technical evidence provided, we consider that our client's site should be removed from the Green Belt in order to meet identified housing needs.

5.4

2.13 This policy could be amended such that it states that development will be determined in accordance with Green Belt planning policy in order to avoid unnecessary repetition and ensure the local plan remains up-to-date.

2.14 The tracked change Publication Local Plan (Library Ref: SD004) does not reflect national Green Belt planning guidance set out through the NPPF. It is not clear why this version seeks to delete limited infilling in villages (Part 3e of Policy SP3); there is no basis for a more restrictive policy requirement through the Wyre Local Plan than already exists through national policy guidance. This 'exception' should be reinserted such that it reflects paragraph 89 of the NPPF.

2.15 In terms of Part 3(e) of Draft Policy SP3, we have previously raised concerns through our representations November 2017 about Policy HP7; the latter requires affordable housing to comprise 100% of units on rural exception sites. This does not meet the NPPF, which enables an element of open market housing to be provided as part of a rural exception scheme.

2.16 We consider that Policy SP3 should be revised such that it development is determined in accordance with national Green Belt planning policy guidance, and Policy HP7 should be amended in order to reflect the NPPF in that open market housing may be permissible in certain instances.