GLADMAN DEVELOPMENTS LIMITED

Planning Policy Team Wyre Council Civic Centre, Breck Road, Poulton-le-Fylde, Lancashire FY6 7PU planning.policy@wyre.gov.uk Gladman House Alexandria Way Congleton CW12 1LB

land@gladman.co.uk

Wednesday 23rd November 2022

SENT BY EMAIL

Dear Sir/ Madam,

<u>Gladman Developments Ltd representations on the Proposed Main Modifications to the Wyre</u> <u>Local Plan Partial Update</u>

This submission provides Gladman Developments Ltd (herein referred to as Gladman) written representations on the Proposed Main Modifications (MMs) to the Wyre Council Local Plan Partial Update.

Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet central Government's objectives and the needs of local communities.

Gladman's comments on the MMs are contained within this letter. Should further hearing sessions be needed as a result of these changes, Gladman would request to be notified.

The National Planning Policy Framework ('the Framework') sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- Positively prepared the plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and be consistent with achieving sustainable development.
- **Justified** the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on a proportionate evidence base.
- Effective the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

www.gladman.co.uk

01260 288800

Gladman welcome the opportunity to submit comments in response to the proposed main modifications to the Wyre Council Local Plan Partial Review. The comments made in this representation build on those already made through our submitted Hearing Statements as well as comments made during the hearings themselves.

The need for a partial update of the Plan is recognised as coming from the Inspectors report which states that they require '...an early review of the LP so that objectively assessed housing needs are fully met over the Plan period'.

To clarify, Gladman wish to make comments in relation to main modification MM/03 in relation to Local Plan Partial Review. MM/o3 contains the additional of paragraph 1.1.6 which states:

'The Council commenced work on a Local Plan Full Review in January 2022. The Full Review will be supported by a new evidence base and will reconsider whether circumstances justify planning for a higher housing need figure than the standard method indicates, in accordance with national policy and guidance.'

Gladman support the inclusion of paragraph 1.1.6. However, whilst the commitment to consider whether the circumstances would justify a higher housing need in the Full Plan Review by the Council is welcome, Gladman is concerned by the strength of the current wording and consider that for the Main Modification to be positively prepared it should be re-worded in order to provide greater clarity on what evidence will be taken into account during the Full Review to assess the need for a higher housing need figure.

The particular evidence base that will be taken into account when assessing the circumstances that would justify planning for a higher housing need should be outlined and include (but not be limited to):

- Population Growth
- Rates of Development & Housing Demand;
- Economic Growth; and
- Affordable Housing Provision

Gladman welcome the opportunity to comment on the Wyre Council Local Plan Partial Update Proposed Main Modifications. For the Local Plan Partial Update to be found sound, it must be able to meet the four tests of soundness set out in the Framework.

We hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact us.

Yours faithfully

Planning Manager Gladman Developments Ltd T: