Dear Sir / Madam,

Representations regarding the Ribble Valley Core Strategy (Regulation 19) Consultation

Thank you for consulting Wyre Council upon the above document. In order to ensure that the Plan is sound officers of Wyre Council wish to make the following comments which relate to the duty to co-operate in the preparation of local plans and requirements for the Local Plan to be justified and consistent with national policy. These comments specifically relate to:

1) The distribution of development and associated transport matters; and
2) Gypsies and Traveller policies.

Distribution of development and associated transport matters
The following comments relate to Key Statement DS1 (Development Strategy) and Key Statement EC1 (Business and Employment Development).

It is noted that 560 new dwellings are planned at Longridge by 2028, a further 816 at other settlements within the borough and that Samlesbury has achieved Enterprise Zone status. Preston City Council are proposing a number of housing sites around the north of Preston as part of their Site Allocations and Development Management Policies DPD and the Wyre Core Strategy Preferred Options proposes 550 new dwellings and 16 hectares of employment land at Garstang and Catterall by 2028. The totality of these proposals will place additional demands upon the existing highway infrastructure particularly around the M6, M55 and A6 where they meet at Broughton.

Whilst the aforementioned Preston DPD Preferred Options safeguards the Broughton bypass Wyre Council officers understand that this matter will be given fresh consideration as part of a strategic level Transport Masterplan which is being undertaken by Lancashire County Council. Given that the publicly available evidence base for the Ribble Valley Core Strategy does not appear contain a Transport/Highway assessment of the advocated distribution of development it is considered prudent for Ribble Valley, Preston and Wyre Councils to work together with Lancashire County Council and the Highways Agency to consider and, if necessary plan for, any effects upon the highway network in the previously mentioned area. This would ensure that the respective local plans are justified and therefore sound.

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Gypsy and Traveller policies
The following comments relate to Key Statement H4 (Gypsy and Traveller Accommodation) and Key Statement DMH2 (Gypsy and Traveller Accommodation).

National planning policy contained within CLG Guidance for Traveller Sites (March 2012) indicates that whilst local planning authorities should make their own assessment of need for the purpose of planning, they should work collaboratively to develop fair and effective strategies to meet need. Paragraphs 9a and 9b of the guidance refers to the need to identify deliverable sites (for the first 5 years) and developable sites or broad locations (years 6 to 10) and, where possible, for years 11-15.

Officers are of the view that there is a need for collaborative working between authorities adjoining Wyre on this matter, including Ribble Valley.

With regard to Key Statement H4 and the justification specifically, Wyre officers consider that there should be greater clarity in relation to the longevity of the current evidence base (GTAA 2008) compared to the time period coverage of the Core Strategy and the Housing and Economic Development DPD. Current evidence appears to cover a time period to 2016 so will not be sufficient to identify both deliverable and developable sites in the local plan. The planned regularity of updates to the GTAA/ needs assessment required to cover the plan period should be indicated and specifically it should be established how this may relate to the need to review the Housing and Economic Development DPD. For example, the justification to Key Statement H4 states that there is no need to identify sites for Travelling Showpeople in Ribble Valley but it should also state that this applies to the period until 2016 and that needs beyond 2016 (and therefore for the majority of the Plan period) are to be established through updates to the GTAA/ needs assessment.

Key Statement DMH2 is a criteria based policy and its purpose to provide criteria to determine proposals comprising unexpected needs and to be used as a basis to allocate sites in the Housing and Economic Development DPD should be expressed explicitly. Additionally, the existing criteria should be expanded in line with CLG guidance to allow thorough assessment of sites by including additional criteria such as flood risk, integration of a proposal with the surrounding area, highway safety and the need for the provision of essential services.

I confirm that Wyre Council wish to be informed of all future stages of local plan preparation.

Yours faithfully