

WYRE LOCAL PLAN EXAMINATION

INSPECTOR'S PRELIMINARY QUESTIONS AND COMMENTS ON ALLOCATIONS

Introduction

1. The purpose of this note is to seek clarification from, and ask questions of, the Council on the allocations and related policies within the Local Plan (LP).
2. These views and questions arise from my initial reading of the Local Plan (LP), some of the key supporting documents and the Summary of Representations.
3. The answers will help me to draw up 'Matters and Issues' for the examination hearings. My questions and comments are without prejudice to consideration of the soundness of the Plan's policies during the remainder of the Examination, including at the hearings. **Some of the answers to the points that I raise may be contained within the evidence base. If that is the case please could my attention be drawn to where I can find the information?**

Wyre Council Response

In responding to the Inspector's questions, relevant aspects of the evidence base wherever relevant will be cross referenced.

4. Not all matters raised go to soundness but may assist with the clarity of the LP. Where a point could potentially be addressed by a Main Modification (MM) or Additional Modification (AM) to the LP I will make this clear by including **MM** or **AM** in the text.
5. All references to paragraphs and policies relate to the 'Wyre LP Submission Draft Local Plan January 2018' (SD004).

The Evidence Base Supporting Allocations

6. The Sustainability Appraisal (SA) considers the allocations against SA Objectives and produces a residual score taking into account potential mitigation. The information supporting the objectives is necessarily high level. For example many sites are shown as lying within 500m of a bus stop but with no factoring in of the frequency, timing and reliability of the service. This could be seen as distorting the score for the site.

Wyre Council Response

As acknowledged above the Local Plan Sustainability Appraisal (SA) is a high level exercise. The Council accepts that without taking account of the nature of the service the conclusion may be distorted. This is similar to considerations of proximity to education and health facilities without taking into account the capacity of such services. It is considered that investigating the nature and capacity of services would have been a disproportionate level of detail for the SA. It should also be noted that the SA is in some instances only correct at a point in time. For instance the presence of a shop or a bus service may change over time. The SA acknowledges this as a technical limitation of sustainability appraisals. (SD005a page 23)

Notwithstanding that the nature of bus services was inputted into the Settlement Study (ED114 page 17-19 and page 24), which has informed the settlement hierarchy and allocations (see Council's response to Paragraph 7 and 9 below.)

7. The Settlement Study (ED114) undertakes a more detailed analysis of a number of factors to rank settlements, including services, facilities and transport. But how have the findings of the settlement study and other evidence been considered alongside the SA to inform site allocations?

Wyre Council Response

The Sustainability Appraisal has been an iterative process along with the Local Plan and as such it has informed the preparation of the Wyre Local Plan.

The process through which site allocations have been identified and confirmed is set out in the Site Allocations Background Paper - ED012a-d). Page's 5 and 6 of ED012a provide an overview of the key evidence base drivers that have informed the allocations.

Page 9-10 of the background paper (ED102a) sets out six principles that have provided the framework for making allocations. These principles relate to, including: -

1. The settlement ranking in the settlement study (ED114),
2. Flood risk (as identified in the Strategic Flood risk Assessment (ED110 – ED113)
3. Availability as identified in the SHLAA (ED089 Appendices 9 and 10)

In relation to residential development a further five principles (ED102 a pages 14 -15) guided allocations. The second one was the highway cap in the various settlements or group of settlements across Wyre (see highways evidence in ED094a)

In view of the highway cap, the Council had to take account of existing permissions, which has restricted the level of choice. Where the Council was able to consider alternative sites as allocation (i.e. those without planning permission or minded to approve), in summary the starting point was the highway capacity or residual highway capacity, then availability and constraints, then locational sustainability factors from the Settlement Study and SA, including opportunities for mitigation. This is described in Appendix 4 of the Site Allocations Background Paper, (ED102a).

In relation to the A6 Corridor (Garstang to Barton) an additional assessment of alternative sites was required which is detailed Annex A of the Sites Allocations Background Paper. (ED102c)

With regards to Forton, options at publication stage were limited due to the information at the time from the H&S Executive about the two high pressure gas pipelines to the north and west of Forton, which was later retracted post publication (See page 68 ED102a). Prior to submission the Council revaluated the proposed allocation at Forton and concluded that it was sound. A particular advantage of the proposed allocation was the opportunity it provided for future residents to use public transport along the A6.

In relation to required Travelling Showpeople Accommodation the allocation was the only option put forward as available and which was assessed as to its suitability. This is set out in section 6.9, page 30 in the Site Allocations Background Paper ED102a.

In relation to employment allocations, at publication stage the sites already had planning permission or were subject to a resolution to grant planning permission.

8. The Strategic Housing Land Availability Assessment (SHLAA) broadly follows the approach advocated by the Planning Practice Guidance (PPG) in assessing suitability, availability and achievability. Appendix 10 to the SHLAA lists the final sites shown by the assessment as being suitable and available assessed as having the capacity of some 7,735 dwellings. The LP provides for less than this number for reasons explained in the LP and elsewhere in the evidence base.
9. In relation to the process of moving from the final sites in the SHLAA to allocations what was the rationale for not allocating any sites in some of the settlements, for example Billsborrow, Knott End/Preesall and Preesall Hill, whereas significant allocations are proposed in settlements in the same position or lower in the hierarchy? To what extent did the overall settlement ranking in the Settlement Study¹ guide allocations? I note that Knott End/Preesall is ranked 6th and Billsborrow 9th. In this respect I am aware of the explanation in the Site Allocations Background Paper (ED012a).

Wyre Council Response

Allocations have been informed by the evidence base and in particular highway evidence and flood risk. The distribution of allocations has also been informed by the presence of sites with an extant planning permission (or Minded to Approve decision). In general the Settlement Study ranking had limited input into the distribution of allocated sites except for the A6 corridor (Garstang to Barton). This is covered in Annex A of the Site Allocations Background Paper (ED102c).

In some cases as a result of this combination of evidence base factors, particularly the highway cap and flood risk, the distribution of allocations doesn't match directly the ranking of settlements in a sequential manner such that settlements ranked higher have a greater identified supply than those ranked lower.

In relation to the examples given in the question the position is as follows:

Billsborrow (ranked 9th) – this settlement lies on the A6 and within the Severe Restriction Zone (SRZ) established by the highway evidence provided by Lancashire County Council (ED094a). Allocations within the SRZ are limited by the highway cap to commitments (extant permissions and Minded to Approve) and the new allocations identified by the process set out in the Site Allocations Background Paper Annex A – A6 Review (ED012c) which gave priority to Garstang as the highest ranked settlement in that zone, with other settlements coming into play if sufficient land could not be identified to meet the residual requirement (once commitments have been taken into account) of 183 dwellings. The residual requirement for 183 dwellings could be fully met at Garstang and therefore no allocations were made at Billsborrow.

Knott End/Preesall (ranked 6th) – this settlement is significantly covered by Flood Zone 3. Preesall Hill (ranked 14th) – this settlement lies between Knott-End/Preesall and Stalmine (ranked 16th). The highway evidence (ED94a) considers the capacity from Hambleton to Knott End/Preesall as 250 dwellings and advising that development should focus as close as possible to the A585 corridor (ED94a page 86). The majority of this capacity is met by SA1/12 Land at Arthurs Lane, Hambleton (ranked 8th) (165 dwellings – based on a planning permission), leaving a residual of 85 dwellings to allocate. The Site

¹ Appendix 5 of ED114

Allocations Background Paper (ED012a) at page's 74 to 82 describes the process by which the residual 85 dwelling were allocated. This recognises the settlement ranking as a starting point but identifies a series of constraints, including significant areas of Flood Zone 2 and 3 at Knott-End/Preesall and Hambleton, and the advice from the highway authority referred to above (ED94a page 86). Consequently the Local Plan allocates the residual capacity at Stalmine even though it has a lower ranking than Knott End / Pressall and Pressall Hill.

10. The LP notes that 30% of agricultural land in Wyre is Grade 2 and 43% Grade 3 but only small pockets of Grade 3 have been analysed to ascertain whether they fall within the definition of the 'best and most versatile' agricultural land (para 2.6.11). How has whether land is best and most versatile been considered alongside other factors in deciding whether a site should be allocated? There is reference in the SHLAA to agricultural land factor being a factor in considering suitability and the SA refers to soil and land quality. However, I could not see reference in the Site Assessment Summary Sheets in the SA to agricultural land quality.

Wyre Council Response

Agricultural land classification was a piece of information that fed into the process. However the Council could not avoid allocations on Grade 2 and 3. All land outside the urban areas and the AONB is Grade 2 and 3. All allocations that did not have planning permission relate to Grade 3 land apart from the allocation at Inskip (SA1/13) and part of the allocation at Great Eccleston (SA 3/3). In both locations Inskip and Great Eccleston there were no alternative options that would avoid using Grade 2 Land that were not restricted by constraints such as flood risk or the presence of a high pressure gas pipeline.

The Council accepts that the SA appears to have omitted to assess the sites with regards to agricultural land even though it is referred to as one of the criteria in the methodology (ED005a page 125 and 128). Notwithstanding this omission in the SA the outcome would have been the same because of the nature of the SA being a high level assessment and also because of the limited options to accommodate development. In relation to agricultural land the SA could not have suggested any appropriate mitigation.

11. The evidence base, including the SA and SHLAA, will be discussed during the hearings (Matters 1, 3 and 4 in particular).

General Comments on Allocations Policies

12. There is a significant amount of detail in the allocation policies some of which is not strictly necessary as it is merely making a statement of fact rather than a policy requirement. Such detail would be picked up at application stage and would be subject to generic policies of the LP. If the Council wish to signpost constraints within the specific allocations it would be more concise and clearer to the decision maker to have a criterion within each specific allocation which as an example for SA1/26 would say:

'The following factors/constraints should be taken into account in development of the site: Water Source Protection Zone, two trees on eastern boundary protected by a Tree Preservation Order, the West Coast Main Line'

Wyre Council Response

The Council accepts that some of the considerations in allocation policies are statements of fact, however it considers that such information will be useful to developers in preparing a masterplan or planning application. Each allocation policy amounts to a

broad 'development brief' for the site. The Council however will reconsider the format of allocation policies to list matters for consideration as one Key Development Consideration. (AM)

13. In addition many of the considerations set out in each policy are generic and are repeated in many policies. The LP could be simplified by having a general policy which relates to all allocations and sets out generic requirements (**MM**). Then it would only be those allocations which have requirements which are specific to them that would need a separate list of considerations. For example Policy SA1 would read something like:

The following sites, shown on the Policies Map, are allocated for residential development. Each allocation will be subject to the following considerations in addition to the Key Development Considerations set out for each site:

- 1. Sites with the capacity for 50 dwellings² or more will require a masterplan covering the whole site which should form part of the application for planning permission.*
- 2. The development should be supported by a landscape and green infrastructure framework incorporating structured tree planting, on-site open space, formal and informal play and pedestrian and cycle connectivity within and outside the site.*
- 3. For allocations on the edge of settlements the design of the development should provide an 'organic' extension to the settlement. It should utilise important key vistas into the adjoining open countryside and provide a rural transition zone between the development and the wider countryside. Particular attention should be given to the nature and quality of boundary treatments.*

Wyre Council Response

As noted above (Council response to paragraph 12) each allocation policy amounts a broad 'development brief' for each site. The Council maintains that including the specific requirements and key matters that need to be taken into account for each site in each separate allocation policy albeit some requirements are common to several sites, the Local Plan is more 'user friendly' both for the developer and also the community.

14. There are inconsistencies between allocations. For example some require a Flood Risk Assessment (FRA) e.g. SA1/5 but not others e.g. SA1/2 or SA1/6. In view of the requirements of national policy and Policy CDMP2 does the requirement for a FRA need to be built into the site specific policies? Similar considerations would apply to other requirements for mitigation which would be addressed by other generic policies of the plan e.g. ecological impacts, trees and hedgerows, infrastructure contributions. (**MM**)

Wyre Council Response

The Council acknowledges the inconsistencies and accept that references to an FRA in the site specific allocations is superfluous. The Council will prepare appropriate modifications to remove the reference to a requirement for an FRA in site specific allocation policies (AM).

² Or potentially a higher figure

15. A number of allocations refer to the provision of a small convenience store (SA1/2, SA1/13, SA1/25, SA3/2, SA3/3, SA3/4, SA3/5, SA4). Assuming Policy EP7 is modified, allocations would also need to reflect a net sales area of 280 sq m (**MM**).

Wyre Council Response

Whilst the Council agrees with the suggested modification to Policy EP7, it considers that in certain locations it would be appropriate to allow for a larger store albeit in compliance with Sunday trading laws it would not be open for more than six continual hours on a Sunday. It is considered that in certain settlements where services are limited there should be an opportunity for a larger store to cater more than just top-up needs, so as to promote sustainable development patterns. Such settlements include Forton, Inskip and Catterall. The Council will reconsider the requirements for a small convenience store in the various allocations and prepare modifications where it would be appropriate for such stores to be aligned with the provisions of policy EP7 as proposed to be amended. (MM).

16. Most of the allocations have a Key Development Consideration relating to 'pedestrian and cycle connectivity within and outside the site'. How feasible is it for off-site connectivity to be improved, particularly in connection with smaller allocations?

Wyre Council Response

The Council accepts that it might not always be feasible to improve connectivity outside the site. Therefore the Council considers that the relevant Key Development Considerations (KDCs) should read 'pedestrian and cycle connectivity within and where possible outside the site' (MM)

17. In relation to habitat loss there is reference to mitigation 'in the local area' for many allocations. In many cases mitigation is only likely to be feasible on site so should the wording be amended to reflect this? (**MM**)

Wyre Council Response

The Council considers that the requirement for mitigation is adequately covered in Policy CDMP4 and therefore superfluous in each of the allocation policies and thus could be deleted. The Council will prepare appropriate modifications to allocation policies. (MM)

18. In terms of the site capacity and housing delivery sections of each site allocation, these should be updated so that they reflect the position at the proposed base date of 31 March 2018. (**MM**)

Wyre Council Response

The Council will prepare appropriate modifications to site allocations to reflect the position as at 31 March 2018. (MM)

19. I have set out below my comments on each site allocation and its Key Development Considerations. I have not indicated whether changes to the policies will be **MMs** or **AMs** as this will be dependent on the extent of changes made in response to my comments.

Housing Allocations

20. The LP makes allocations for 5,375 dwellings of which 5,027 will be delivered in the plan period (see para 9.2.1 of the LP). My understanding is that the allocations are made up as follows:

Source	Plan Period	Total
Housing Allocations	3,337	3,457
Mixed Use	1,440	1,668
Hill House	250	250
Total	5,027	5,375

Wyre Council Response

The Council confirms that the above table is correct.

SA1 – Residential Development

Site SA1/1 – West of Broadway, Fleetwood

21. Key Development Consideration 2 is unnecessary.

Wyre Council Response

The Council agrees that KDC 2 is not necessary and will prepare an appropriate modification to delete it (AM).

22. Potential issues for discussion at the hearings are loss of open space and the sequential and exception tests (Flood Zone 3).

Site SA1/2 – Lambs Road/Raikes Road, Thornton

23. Are there any implications for the development of the site from Key Development Considerations 11 and 13 (telecoms mast)? If there are implications then this should be built into the consideration e.g. 'Development should provide connectivity to the public rights of way to the south on Woodhouse Road and that link Woodhouse Road and Raikes Lane'. If there are no implications then the considerations can be deleted. A similar approach should be taken to the other Key Development Considerations referred to below where the implications for the development are not clear.

Wyre Council Response

In some instances KDCs relate to matters that the developer must take into account in preparing the details of a planning application. It is considered that it would be too onerous for the Local Plan process to consider in detail the exact implications of each consideration. For example whether the development should connect directly to any or all public rights of way would be a matter for the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

If considered necessary to improve clarity of the Local Plan in addition to the content in paragraph 1.3.6, the Council will prepare an appropriate modification to include further text in section 9.2 preceding Policy SA1 to further explain the nature of KDCs. (MM).

24. Potential issues for discussion at the hearings are landscape impacts, access to the site, the highway network and education provision.

Site SA1/3 – Land between Fleetwood Road North and Pheasant Wood, Thornton

25. A potential issue for discussion at the hearings is the highway network.

Site SA1/4 – Bourne Poacher, Thornton

26. Potential issues for discussion at the hearings are the sequential and exception tests (Flood Zone 3).

Wyre Council Response

It should be noted that site SA1/4 has planning permission covering the whole allocation and it is under construction. When allocations are updated in line with the 31 March 2018 monitoring (as per response to paragraph 18), allocation SA1/4 will be deleted through a modification.

Site SA1/5 – South East of Poulton-le-Fylde

27. Does the housing delivery section need updating due to the existence of planning permissions?

Wyre Council Response

The housing delivery section is based on the position as at 31 March 2017. The Council will update the section to reflect the position at the proposed base date of 31 March 2018 (see response to paragraph 18 above).

28. Are there any implications for the development of the site from Key Development Considerations 10 and 13? If none then they can be deleted.

Wyre Council Response

KDC 10 and 13 are matters that must be taken into account in preparing the details of a planning application. The Council considers that they are useful references for developers. It would have been too onerous and inappropriate for the Local Plan to determine the implications of such considerations. It is not considered that these are 'show stoppers' that would prevent development but must be taken into account in the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

29. Is the provision of a footbridge (Key Development Consideration 11) necessary? Are there any implications for the viability of the development?

Wyre Council Response

It is accepted that the KDC is poorly drafted. The development is expected to set aside land for the delivery of a footbridge by Network Rail as part of the electrification of the Preston to Blackpool North rail line. This matter is covered in a condition to the planning permission on the site. A footbridge from the site across the rail line will give pedestrian

access to employment and also the Lidl store on Garstang Road East and thus improve the sustainability of the site.

The Council will prepare an appropriate modification to amend the wording of KDC 11. (MM)

Site SA1/6 - Land at Garstang Road, Poulton-le-Fylde

30. Are there any implications for the development of the site from Key Development Considerations 8, 9 and 11? If none then they can be deleted.

Wyre Council Response

KDC 8, 9 and 11 are matters that must be taken into account in preparing the details of a planning application. The Council considers that they are useful references for developers. It would have been too onerous and inappropriate for the Local Plan to determine the implications of such considerations. It is not considered that these are 'show stoppers' that would prevent development but must be taken into account in the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

It should be noted that site SA1/6 has planning permission covering the whole allocation and it is under construction. When allocations are updated in line with the 31 March 2018 monitoring (as per response to paragraph 18), allocation SA1/6 will be deleted through a modification.

Site SA1/7 – Land off Moorland Road, Poulton-le-Fylde

31. Are there any implications for the development of the site from Key Development Consideration 3? If none then it can be deleted.

Wyre Council Response

KDC 3 is a matter that must be taken into account in preparing the details of a planning application. The Council considers that it is a useful reference for developers. It would have been too onerous and inappropriate for the Local Plan to determine the implications of such consideration. It is not considered that this is a 'show stopper' that would prevent development but must be taken into account in the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

It should be noted that site SA1/6 has planning permission covering the whole allocation and it is under construction. When allocations are updated in line with the 31 March 2018 monitoring (as per response to paragraph 18), allocation SA1/6 will be deleted through a modification.

Site SA1/8 – South of Blackpool Road, Poulton-le-Fylde

32. Are there any implications for the development of the site from Key Development Considerations 10, 11 and 12? If none then they can be deleted.

Wyre Council Response

KDC 10, 11 and 12 are matters that must be taken into account in preparing the details of a planning application. The Council considers that they are useful references for developers. It would have been too onerous and inappropriate for the Local Plan to determine the implications of such considerations. It is not considered that these are 'show stoppers' that would prevent development but must be taken into account in the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

33. Potential issues for discussion at the hearings are loss of Green Belt land, highway network constraints, site capacity and delivery (nos. that could be delivered in the plan period).

Site SA1/9 – South Stalmine, Stalmine

34. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.

Wyre Council Response

Lancashire County Council (Education) could not confirm their position whether it will be a requirement to extend the school at Stalmine. Further school places are required at Hambleton / Stalmine however if the school at Hambleton, which is an academy, were to expand then additional places at Stalmine would not be required. The Local Plan includes KDC7 to ensure flexibility and appropriate school provision to support developments. (See ED004 Infrastructure Delivery Plan (IDP) page 54)

The Council will seek an update position from LCC regarding the position in Stalmine.

35. Potential issues for discussion at the hearings are highway network constraints, surface water and density/housing mix.

Site SA1/10 – North of Garstang Road, Pilling

36. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.

Wyre Council Response

KDC 7 is a matter that must be taken into account in preparing the details of a planning application. The Council considers that it is a useful reference for developers. It would have been too onerous and inappropriate for the Local Plan to determine the implications of such considerations. It is not considered that it is a 'show stoppers' that would prevent development but it must be taken into account in the design of the development. As per response to paragraph 12 above the Council will reconsider the format of the policy to list matters for consideration as one Key Development Consideration. (AM)

37. The wording of Key Development Consideration 3 is confusing. It would be sufficient to say in the 2nd sentence that an FRA would be required (although see comments earlier in para 14).

Wyre Council Response

The site lies within FZ3 and the Environment Agency advised that it would be useful that KDCs include the expected mitigation (e.g. design floor levels). The matters covered by KDC3 must be taken into account in preparing the details of a planning application. The Council considers that KDC3 is a useful reference for developers. This is consistent with other allocations in FZ3 such as SA1/1. It is acknowledged that the second sentence in KDC 3 is poorly drafted. The Council will prepare an appropriate modification to improve the clarity of KDC 3, (AM). (See also response for paragraph 14 regarding the requirement for an FRA)

Site SA1/11 – North of Norcross Lane, Norcross

38. The commentary on site delivery indicates that a mixed development is likely to come forward. Should the site be considered as a Mixed Use Development under Policy SA3 rather than under Policy SA1? Has the employment component been taken into account in the employment land figures?

Wyre Council Response

Site SA1/11 covers a former Government office site which has extant outline planning permission on part of the site for residential, employment and retail. The land where the indicative layout has shown the retail element has subsequently been sold off and benefits from a further separate full retail permission which if implemented will extinguish the outline permission.

The landowner in their representation has supported the allocation which aligns with previous discussions with the Council about the deliverability of employment on this site. This also led to the central part of the allocation (Clarke House) which is an employment site that became vacant after the outline planning permission, being also allocated for housing.

The Council considers that the allocation solely for housing is appropriate as it is not expected that the employment element of the original planning permission will be implemented. Therefore it is not appropriate to consider this site as a mixed use allocation which would mean making a retail allocation on an out of centre site. Should the retail planning permission not be implemented, the appropriateness of a new planning permission should be considered on its merits at the appropriate time.

The employment element of the outline permission has not been taken into account in the Local Plan supply figure. The original loss of the employment site that was covered by the outline planning permission is taken into account in the employment requirement figure. The additional loss (Clarke House) arising by the allocation of the central part of the site for housing is accounted by reducing the supply figure by 2 hectares. (See also response in paragraph 71 below).

39. Potential issues for discussion at the hearings are highway network constraints, site capacity and delivery.

Site SA1/12 – Land at Arthurs Lane, Hambleton

40. Are there any implications for the development of the site from Key Development Considerations 7-9? If none then they can be deleted.

Wyre Council Response

The matters covered by KDCs 7-9 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/13 – Inskip Extension

41. Which part of the site has planning permission?

Wyre Council Response

The plan in Annex 1 shows the land with planning permission.

42. Are there any implications for the development of the site from Key Development Considerations 9-11? If none then they can be deleted.

Wyre Council Response

The matters covered by KDCs 9-11 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

43. Why might a project level Habitat Regulation Assessment be required?

Wyre Council Response

The Habitat Regulation Assessment (SD006) has been developed from considerable ongoing consultation with Natural England (NE). In earlier discussions, NE raised potential concerns over fluctuating bird numbers, so whilst at the point of preparing the Local Plan HRA the number of birds were not considered significant and regularly using the land (i.e. functionally linked land), as the Local Plan would run until 2031, NE were concerned that the land could constitute functional linked land when the subsequent planning application comes forward.

In relation to SA1/13 Inskip Extension, the detailed screening of the site allocation (SD006 Table 11, page 41) concluded no likely significant effects as the closest land to the allocation site that could constitute functionally linked land is located more than 800 metres away. As a precautionary measure and in response to NE concerns, the Local Plan policy has included a criterion within the key development considerations for the applicant to consider whether a project level HRA is required for SA1/13.

44. Potential main issues for discussion at the relevant hearing are highway network and infrastructure constraints, sustainable modes of travel, the availability of nearby services and employment, landscape impact, scale of development relative to settlement, loss of agricultural land, flood risk (surface water), the mix of uses and delivery.

Site SA1/14 – North of New Holly Hotel and Bodkin Cottage, Hollins Lane

45. Is the whole of the site now a commitment with planning permission?

Wyre Council Response

As of November 2017 the whole site is covered by outline planning permission for 38 dwellings. As per response to paragraph 18 above the Council will prepare an appropriate modification to update the information to the 31 March 2018 position. (AM)

46. Are there any implications for the development of the site from Key Development Consideration 1? If none then it can be deleted.

Wyre Council Response

The Council accepts that KDC 1 is superfluous and will prepare an appropriate modification for its deletion. (AM)

Site SA1/15 – North East of Hollins Lane, Hollins Lane

47. Is the whole of the site now a commitment with planning permission?

Wyre Council Response

The whole of the site is covered by two outline planning permissions for a total of 51 dwellings. As per response to paragraph 18 above the Council will prepare an appropriate modification to update the information to the 31 March 2018 position. (AM)

48. Are there any implications for the development of the site from Key Development Considerations 4 (relating to Flood Zone 1) and 6? If none then they can be deleted.

Wyre Council Response

The Council accepts that the first part of KDC 4 referring to Flood Zone 1 is superfluous and will prepare an appropriate modification for its deletion. (AM)

The matter covered by KDC6 must be taken into account in preparing the details of a planning application. The Council considers that KDC6 is a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/16 – West of Cockerham Road, Garstang

49. Are there any implications for the development of the site from Key Development Considerations 4 (relating to Flood Zone 1) and 5? If none then they can be deleted.

Wyre Council Response

The Council accepts that the first part of KDC 4 referring to Flood Zone 1 is superfluous and will prepare an appropriate modification for its deletion. (AM)

The matter covered by KDC5 must be taken into account in preparing the details of a planning application. The Council considers that KDC5 is a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

50. In relation to Key Development Consideration 2 it is assumed that the A6 Corridor Sustainable Transport Strategy and Initiative 2 would assist in pedestrian and cycle connectivity outside the site.

Wyre Council Response

The Council confirms that the A6 Corridor Sustainable Transport Strategy will assist in pedestrian and cycle connectivity outside the site.

51. Issues for discussion at the hearings are the highway network and site capacity and delivery.

Site SA1/17 – Land south of Prospect Farm, west of the A6, Garstang

52. In relation to Key Development Considerations 2 and 7 it is assumed that the A6 Corridor Sustainable Transport Strategy would assist in pedestrian and cycle connectivity outside the site and improving pedestrian/cycle access to Garstang across the A6.

Wyre Council Response

The Council confirms that the A6 Corridor Sustainable Transport Strategy will assist in pedestrian and cycle connectivity outside the site.

53. Issues for discussion at the hearings are the highway network and site capacity and delivery.

Site SA1/18 – South of Kepple Lane, Garstang

54. Are there any implications for the development of the site from Key Development Considerations 7 and 12? If none then it can be deleted.

Wyre Council Response

The matter covered by KDC7 and 12 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

55. Should there be a requirement that the existing travelling showpeople yard is relocated to allocation SA6 before development takes place?

Wyre Council Response

The whole of housing allocation SA1/18 is covered by two planning permissions which can be implemented without replacing the existing yard. It should be noted that the existing yard does not have planning permission and it is an unlawful use. Nonetheless the allocated site SA6 is owned by the travelling showperson who also jointly owns the existing travelling showpeople yard on Kepple Lane and has submitted a planning application for the development of site SA6 as a travelling showpeople's yard.

56. Is there any requirement for expansion of the adjacent primary school onto SA1/18?

Wyre Council Response

The Local Plan makes provision for a new primary school to serve the A6 corridor on site SA1/16 West of Cockerham Road. As noted above in the response to paragraph 55, the whole allocation SA1/18 benefits from two planning permissions for residential development.

57. Should the anticipated housing capacity be changed to 125 dwellings to reflect recent commitments?

Wyre Council Response

As per response to paragraph 18 above the Council will update housing figures and allocations based on the monitoring information as at 31 March 2018, (AM).

Site SA1/19 – Bowgreave House Farm, Bowgreave

58. Are there any implications for the development of the site from Key Development Consideration 4? If none then it can be deleted. Key Development Consideration 9 is unnecessary.

Wyre Council Response

The Council accepts that KDC 9 is unnecessary and will prepare an appropriate modification for its deletion. (AM)

The matter covered by KDC4 must be taken into account in preparing the details of a planning application. The Council considers that KDC4 is a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/20 – Garstang Road, Bowgreave

59. Are there any implications for the development of the site from Key Development Considerations 4 and 6? If none then they can be deleted.

Wyre Council Response

The matter covered by KDC4 and 6 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to

paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/21 – Land south of Calder House Lane, Bowgreave

60. Are there any implications for the development of the site from Key Development Considerations 6, 8, 9 and 11? If none then they can be deleted.

Wyre Council Response

The matter covered by KDC 6,8,9 and 11 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/22 – Garstang Country Hotel and Golf Club, Garstang Road, Bowgreave

61. Are there any implications for the development of the site from Key Development Considerations 5, 7 and 10? If none then they can be deleted.

Wyre Council Response

The matter covered by KDC 5,7 and 10 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/23 – Daniel Fold Farm, Daniel Fold Lane, Catterall

62. Are there any implications for the development of the site from Key Development Considerations 6, 10 and 12? If none then they can be deleted.

Wyre Council Response

The matters covered by KDC 6,10 and 12 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/24 – Daniel Fold Farm Phase 2, Catterall

63. Are there any implications for the development of the site from Key Development Considerations 5, 7 and 9? If none then they can be deleted.

Wyre Council Response

The matters covered by KDC 5,7 and 9 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy

would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

64. Should the medical centre referred to in the Housing Delivery Section form part of the allocation and should there be a phasing requirement that it comes forward with the housing?

Wyre Council Response

The 'Delivery section' reflects the extant planning permission on the site. It is acknowledged that the planning permission includes a medical centre and although land is safeguarded for a medical centre by a condition on the planning permission it was recognised during the consideration of the planning application that there is little prospect of its delivery. This reflects discussions with the relevant Clinical Commissioning Group, (CCG) during the preparation of the Local Plan and Infrastructure Delivery Plan, (IDP – ED004 Pages 47-50). The CCG has indicated that there is no need for an additional medical facility on the A6 corridor (Garstang to Barton) and as such the proposed medical centre at Catterall is not supported.

It is therefore not considered appropriate that there is a phasing requirement in the Local Plan in relation to the medical centre.

65. I note that there is land sandwiched between SA1/23, SA1/24 and SA2/3 which is not allocated. The SHLAA indicates that the site is 'not available for development.' Are there any particular reasons for this given its location within the settlement boundary?

Wyre Council Response

The land sandwiched between SA1/23, SA1/24 and SA2/3 is a working farm and the landowner advised that it is not available for development. The Settlement Boundary Background Paper (ED011 page 10) acknowledges that the new boundary at this point includes a small area of properties and said farm which front the A6 between allocations SA2/3 and SA1/24. The paper acknowledges that although it is a principle of the settlement boundary study methodology that boundaries exclude significant areas of so called "white land" (i.e. unallocated open land), in this case it was considered that the use of the A6 as the settlement boundary was preferable.

Site SA1/25 – Land off Garstang Road, Barton

66. Are there any implications for the development of the site from Key Development Considerations 5, 8 and 9? If none then they can be deleted.

Wyre Council Response

The matters covered by KDC 5,8 and 9 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/26 – Land rear of Shepherds Farm, Barton

67. I note that Shepherds Farm is enveloped by the allocation and lies within the settlement boundary. Whilst noting the 'highway cap' it would seem logical to extend the allocation given that there is a willing landowner.

Wyre Council Response

The allocated site (SA 1/26), which benefits from planning permission subject to a section 106 obligation, will be developed separately to Shepherd Farm (rep ID. 0873/P/01/C). Shepherd Farm is located within the settlement boundary of Barton and could come forward as a windfall site subject to highway considerations. This is a large site (0.6 ha) that could accommodate appropriately 18 dwellings. As an allocation or part of an allocation it is not supported by the highway evidence and therefore there is uncertainty over its deliverability.

68. Are there any implications for the development of the site from Key Development Considerations 4, 6 and 7? If none then they can be deleted.

Wyre Council Response

The matters covered by KDC 4,6 and 7 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Site SA1/27 – Land rear of 867 Garstang Road, Barton

69. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.

Wyre Council Response

The matter covered by KDC 7 must be taken into account in preparing the details of a planning application. The Council considers KDC7 is a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Employment Allocations

70. The LP refers to 43 ha of employment land being delivered in the plan period (Policies SP1 and EP1). That said Table 8.2 on page 73 refers to gross provision of some 48 ha. There is an apparent inconsistency in the figures. Moreover, in analysing the various components of employment land supply the following figures arise:

Source of Employment Land Supply	Plan Period (ha)
Employment Development	6.34
Mixed Use Allocations	15.13

Hill House	13.00
Port of Fleetwood	7.0
Completions since 1 April 2011	9.25
Under Construction	4.61
Loss of employment land	2.00
Total (Net)	53.33

71. Please could the differences be explained or the figures corrected to be consistent (MM?).

Wyre Council Response

As explained in the response to paragraph 29 in the Inspector’s Preliminary Matters, Issues and Questions (ELI001b), employment land loses are added onto the requirement. However the loss arising from the allocation at Norcross (SA1/11) of two hectares, (Clarke House), was not taken into account in setting the requirement and therefore it is taken off the supply, (appearing as a minus in table 8.2). It is considered that it would be wrong to refer to 48 hectares as a gross land supply against a requirement of 43 hectares.

If it is considered that it would improve the clarity and consistency in the Local Plan, the Council will amend the OAN figure to 45 hectares to reflect the additional loss of two hectares (Clarke House) by the site allocation SA1/11 and also amend table 8.2 to delete the fourth line – Large scale employment loss: -2 hectares. The total supply will then be 48 Hectares.

It is not considered that the land at the Port of Fleetwood should be included in the land supply towards meeting the employment OAN. The Port of Fleetwood is a designated port and policy SA5 seeks to retain the site’s Port designation. Port related development does not fall within use classes B1, B2 and B8 and does not contribute towards meeting the requirement of 43ha of employment land for B1, B2 and B8 developments. It is acknowledge that under Policy SA5 employment development within B1, B2 and B8 may come forward where it would benefit from the specific port location, but the prime purpose of Policy SA5 is to bring forward port related uses.

The Wyre Employment Land and Commercial Leisure Study 2012 (ED103 – para 9.87, page 100) recommends the Port of Fleetwood for “Port Related Use”. The recommended adjustments to the existing portfolio of employment land identifies the Port as a restricted use that could be removed from the general employment land portfolio and protected for restricted/specialist use.

Employment Development

72. There are four employment development allocations under Policy SA2. However, two of these (SA2/1 and SA2/2) relate to small sites with planning permissions in relatively isolated rural locations. In Table 4.1 they are shown as commitments (total of 1.92 ha). Should these sites be treated as commitments or windfalls rather than allocations?

Wyre Council Response

The Council considers that is appropriate to treat these sites, (SA2/1 and SA2/2) as allocations to meet need in rural areas.

The Wyre Employment Land and Commercial Leisure Study 2012 (ED103) makes numerous references to three sub markets – A6 Corridor, Wyre Peninsula and Rural Areas with regards to existing supply and future allocations.

The 2015 Commercial Market Review (ED108) also identifies the three submarkets (section 7) and concludes that allocations should be provided wherever possible within each of the submarket areas (paragraph 8.10).

73. The Riverside Industrial Park Extension, Catterall (SA2/3) and land south of Goose Lane (SA2/4) have planning permission or a resolution to grant according to SD007g (page 76) so the Employment Delivery sections should be updated.

Wyre Council Response

The Council will prepare an appropriate modification to update the position in the delivery section. (AM).

74. In terms of SA2/4 what are the implications of 'Key Development Considerations' 2 and 7 for development of the site, if any? Although the application for planning permission offers some support for delivery of the site it has an awkward shape which would limit the extent of developable land and there are contributions/works required for off-site infrastructure. Is the site likely to be viable and deliverable?

Wyre Council Response

The Council considers that the matters covered by KDC 2 and 7 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

The allocation for employment use of 1 hectare is the developable part of the site which is expected to come forward in B class uses. The gross site area is 1.46 hectares and the planning permission includes also an A3 use. The latter should assist with the viability of the site.

Mixed Use Developments

75. The explanation to Policy SA3 refers to the delivery of a mix of uses on these sites (para 9.4.1). Should Policy SA3 or the Key Development Considerations for each site include a requirement for phasing so that there is a link between the provision of housing, employment and other uses?

Wyre Council Response

The Local Plan covers the period up to 2031 and seeks to ensure that provision is made for employment and in some cases other uses. However it is acknowledged employment and other uses are responsive to market demand or in the case of services such as health and education, dependent on the infrastructure provider's development programme. In view of the Government's emphasis on the urgent need to deliver housing, the Council considers that it would be inappropriate to phase housing development in relation to employment or other development which are influenced by considerations beyond the Council's or housebuilder's control.

Site SA3/1 – Fleetwood Dock and Marina

76. Issues for discussion at the relevant hearing for Fleetwood are the highway network; flood risk; the mix of uses; site capacity; and delivery.

Site SA3/2 – Joe Lane, Catterall

77. What are the implications of 'Key Development Considerations' 7 and 10 for development of the site, if any?

Wyre Council Response

The matters covered by KDC 7 and 10 must be taken into account in preparing the details of a planning application. The Council considers these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

78. Issues for discussion at the relevant hearing for Catterall are the mix of uses; site capacity; and delivery.

Site SA3/3 – Land west of Great Eccleston

79. What are the implications of 'Key Development Considerations' 5 (Flood Zone 1), 9 (Grade II listed buildings at Pinfold and St Anne's Church) and 10 for development of the site, if any?

Wyre Council Response

The Council accepts that the first part of KDC 5 referring to Flood Zone 1 is superfluous and will prepare and appropriate modification for its deletion. (AM)

The matters covered by KDC 9 and 10 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

80. Potential issues for discussion at the relevant hearing are highway network and infrastructure constraints, the availability of services and employment, sustainable modes of travel, landscape impact, scale of development relative to the settlement, loss of agricultural land, the setting of listed buildings, flood risk (surface water), the mix of uses and delivery.

Site SA3/4 – Forton Extension

81. Reference should be made to questions in EL1.001a (para 17) in relation to the Strategic Area of Separation.

82. What are the implications of 'Key Development Considerations' 4 (Flood Zone 1), 5, 10, 11, 13 and 14 for development of the site, if any?

Wyre Council Response

The Council accepts that the first part of KDC 4 referring to Flood Zone 1 is superfluous and will prepare and appropriate modification for its deletion. (AM)

The matters covered by KDC 5, 10, 11, 13 and 14 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

83. Is there any particular reason why the established bowling green and playground need to form part of the allocation and could potentially be relocated?

Wyre Council Response

The inclusion of the recreation area within the allocation provides flexibility if access for the parcels of land on the east side of Winder Lane cannot be gained from School Lane. Irrespective of access to the east of Winder Lane, the inclusion of the recreation land could facilitate better connectivity within the extended village. It is not expected that the actual facilities will be affected as there is land to the south of the playground to provide connectivity.

84. Potential issues for discussion at the relevant hearing are the highway network and infrastructure constraints, the availability of services and employment, sustainable modes of travel, landscape impact including on the Strategic Area of Separation, scale of development relative to the settlement, loss of agricultural land, the setting of listed buildings, flood risk (surface water), the mix of uses and delivery.

Site SA3/5 – Land west of the A6, Garstang

85. What are the implications of 'Key Development Considerations' 5 (Flood Zone 1), 6, 10, 11, 12 and 14 for development of the site, if any?

Wyre Council Response

The Council accepts that the first part of KDC 5 referring to Flood Zone 1 is superfluous and will prepare and appropriate modification for its deletion. (AM)

The matters covered by KDC 6, 10, 11, 12 and 14 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

86. In terms of Key Development Consideration 2 has the feasibility of a green link under the A6 been assessed?

Wyre Council Response

The feasibility of a 'green' link under the A6 was discussed between Lancashire County Council, (LCC) and the landowner as part of the planning application for the site which now has planning permission. LCC advised that it is feasible for such a link because the former rail bridge structure is still in place albeit the rail corridor under the A6 was filled in. The implementation of a 'green' link would not involve digging a new tunnel under the A6 and installing a bridge structure.

Site SA4 - Hillhouse Technology Enterprise Zone, Thornton

87. What is the implication of 'Key Development Consideration' 7 for development of the site, if any?

Wyre Council Response

The matter covered by KDC 7 must be taken into account in preparing the details of a planning application. The Council considers that KDC 7 is a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

88. The wording of Key Development Consideration 3 is confusing. It would be sufficient to say in the 3rd sentence that an FRA would be required (although see comments earlier in para 14).

Wyre Council Response

The Council will reconsider the wording of KDC 3 and will prepare an appropriate modification to improve its clarity. (AM).

89. Potential issues for discussion at the relevant hearing for Thornton are the highway network; flood risk; the mix of uses; site capacity; and delivery.

Site SA5 - Fleetwood Port

90. What are the implications of 'Key Development Considerations' 1, 6 and 7 for development of the site, if any?

Wyre Council Response

The matters covered by KDC 1, 6 and 7 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

91. Is the Council aware of any funding opportunities which may assist in bringing the site forward in the LP period?

Wyre Council Response

The site is owned by Associated British Ports (ABP) who will be responsible for bringing the site forward. The Council has on-going discussions with ABP through its planning and economic development function so as to facilitate the delivery of the site. ABP are exploring opportunities for this site.

92. Potential issues for discussion at the relevant hearing for Fleetwood are the highway network; flood risk; the mix of uses; site capacity; and delivery.

SA6 - Travelling Showpeople Site – Land at Conway, West of A6, Garstang

93. One site is allocated for travelling showpeople but the GTAA suggested that existing households at the unauthorised site in Garstang were looking for 2 new yards in the local area³. What is the current position?

Wyre Council Response

Although the GTAA (ED079) makes reference to the desire for 2 yards the requirement to allocate land to satisfy identified needs relates to the number of pitches rather than number of yards. The Council has allocated a site which meets the need in full.

It should be noted that the allocated site is the only site considered suitable and available that was put forward to the Council. The process for identifying sites for Travelling Showpeople is set out in the Site Allocations Background Paper (ED012a) pages 30-32.

94. What are the implications of 'Key Development Considerations' 2 (Flood Zone 1), 3 and 4 for development of the site, if any?

Wyre Council Response

The Council accepts that the first part of KDC 2 referring to Flood Zone 1 is superfluous and will prepare an appropriate modification for its deletion. (AM)

The matters covered by KDC 3 and 4 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

95. Key Development Consideration 1 includes a range of requirements which may be desirable but are they all necessary and feasible?

Wyre Council Response

The Council considers that the requirements in KDC 1 are necessary for any residential site. The Council will prepare an appropriate modification with regards to connectivity outside the site, (MM). (See also response to paragraph 16 above).

96. The site will be discussed during the hearing session for Matter 5 (Specific Housing Needs and Generic Housing Policies).

³ ED079 page 19, para 3.45

Site SA7 - Development Opportunity – Brockholes Industrial Estate, Catterall

97. What are the implications of 'Key Development Considerations' 7, 9, 10 and 13 for development of the site, if any?

Wyre Council Response

The matters covered by KDC 7, 9, 10 and 13 must be taken into account in preparing the details of a planning application. The Council considers that these KDCs are a useful reference for developers. However the Council considers that the format of the policy would benefit by grouping together matters that must be taken into account. (See response to paragraph 12 above). The Council will prepare an appropriate modification to improve the format of the policy. (AM).

Other Minor Comments

98. I have noted a number of further typos and also have some more minor queries. These do not go to soundness but to be helpful I have set these out in the **Appendix**. I do not require any feedback on these comments unless a point needs clarification.

Response

99. I would like a response by the Council to the above comments and questions by **4 April 2018** or earlier if possible. I am not inviting comments from other parties at this stage. I want to clarify the Council's position first. This will help me to refine Matters and Issues for the hearings and set agendas and questions. All parties with relevant representations will have the opportunity to respond in advance of the hearings should they wish.

100. As referred to earlier if the Council consider that the point or question could be dealt with by a **MM** or **AM** then please confirm. As the examination develops Schedules of MMs and AMs should be produced. The former should be in place in draft form in advance of the hearings, preferably published at the same time as any statements when it will become an examination document and inform discussion at the hearings. It will be refined during and after the hearings. This is on the assumption that the Council wish me to recommend any MMs that are necessary to resolve issues of legal compliance or 'unsoundness'.

101. If you require clarification of any of the above points please contact me via the Programme Officer.

Mark Dakeyne

INSPECTOR

Attached – Appendix

Appendix – Typos and Minor Queries

Wyre Council Response

The Council will prepare appropriate modifications (AMs) in relation to the matters covered below.

9. Site Allocations

Para 9.1.2 – 4th line – ‘on the’ repeated.

Site SA1/4 – Bourne Poacher, Thornton - there is a typo in Key Development Consideration 2 (‘in associated’).

SA1/7 – Land off Moorland Road, Poulton-le-Fylde – there is a typo in Key Development Consideration 3 - ‘listed buildings’ (plural)

Site SA1/19 – Bowgreave House Farm, Bowgreave – Key Development Consideration 2 – 1st line – ‘village’ not ‘town’.

Site SA1/21 – Land south of Calder House Lane, Bowgreave – Key Development Consideration 3 – space needed – ‘1, 2 and 3.’

Site SA1/23 – Land at Daniel Fold Farm – stray ‘and’ at end of Housing Delivery Section.

Site SA1/24 – Daniel Fold Farm Phase 2 - Key Development Consideration 6 – missing word ‘side left clear’?

Is the reference to surface water draining south to the River Wyre within the Catterall allocations factually correct given that the river is to the north of the settlement?

Wyre Council Response

Surface water should drain north to the River Wyre. However, Yoad Pool south of the allocations meets the River Wyre at St Michael-on-Wyre and surface water could also drain via Yoad Pool.

Site SA1/27 – Land rear of 867 Garstang Road, Barton - Key Development Consideration 5 – ‘western boundary’ not ‘eastern’.

Site SA3/4 – Forton Extension – site description – are the compass references accurate?

Wyre Council Response

The Council will revise the site description to provide clarity.

Site SA6 – Site Capacity should refer to ‘plots’ not ‘pitches’.

Annex 1

Site SA1/13 – Inskip Extension

The plan shows the land with planning permission.

