

WYRE LOCAL PLAN EXAMINATION

STATEMENT BY WYRE BOROUGH COUNCIL ON THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 2 Strategy and Strategic Policies

Issue 1 – The spatial distribution of development

1.1 *Is the strategy for the distribution of development (described as ‘dispersal’) justified?*

1.1.1 Yes it is.

1.1.2 The Council has proposed a modification to the Local Plan paragraph 4.1.11 (SD001) to refer to the Local Plan strategy as “managed dispersal”.

1.1.3 As explained in chapter 4 of the Local Plan¹ (paragraph 4.1.11), it is the only strategy possible within identified constraints, primarily highway capacity and flood risk. Although the Council considered three possible strategic options early in the process, due to constraints the Council does not have the same options as to how the Local Plan could accommodate development. The distribution of development in the Local Plan has been largely determined by the available highway capacity taking into account deliverable mitigation. In order for the Council to maximise opportunities in meeting identified needs, the resultant strategy is one of ‘managed dispersal’. It is not however the ‘dispersal’ option considered in the Issues and Options Report.

1.2 *Should the LP include a Key Diagram (para 157 of the National Planning Policy Framework (NPPF) refers)?*

1.2.1 No it should not.

1.2.2 It is not the intention of the Council to prepare any other Local Plan for Wyre such as a Site Allocations Local Plan. The Local Plan does not have broad locations for strategic development which could be shown on a Key Diagram, but instead detailed site allocations shown on the Policies Map. It is considered that a key diagram will not add clarity or anything of substance to the Local Plan. It will constitute a diagrammatic representation of the Policies Map.

Issue 2 – Settlement hierarchy

2.1 *Is the position of settlements in the hierarchy within Policy SP1 justified?*

2.1.1 Yes it is.

2.1.2 The settlement hierarchy has been informed by robust evidence set out in the

¹ Submission Document Library Reference SD004

Settlement Study².

- 2.1.3 As explained in Wyre Settlement Study Addendum³ (hereafter in this Statement referred to as the Addendum), the hierarchy is largely based on the settlement ranking and expected growth over the plan period (page 5). The settlement ranking is established in the Wyre Settlement Study. Differences between the settlement ranking and the final Local Plan hierarchy are explained in the Addendum at page 6. Overall, it is concluded that there is a strong relationship between the settlement ranking provided by the Settlement Study and Policy SP1.
- 2.1.4 The Addendum (pages 4 to 5) sets out the broad characteristics displayed by settlements in each of the different parts of the hierarchy. The Council has noticed that the description of “Rural Service Centres” has been mistakenly omitted from Table 1 of the Addendum. Rural Service Centres are larger rural settlements with good access to a wider range of services and facilities, with some access to employment and good to moderate public transport accessibility.
- 2.1.5 Policy SP1 identifies six parts to the hierarchy – Urban Town, Key Service Centre, Rural Service Centres, Main Rural Settlements, Small Rural Settlements and Other Undefined Rural Settlements. There is no national or standard methodology for grouping settlements in a hierarchy or any standard nomenclature for describing groups of settlements within a hierarchical structure. The terminology used in Policy SP1 is appropriate to the nature of the borough’s settlements, which can be broadly categorised as urban and rural.
- 2.1.6 The Urban Towns tend to be the most populous settlements with the largest range of services and facilities with very good access to employment and public transport. They tend to occupy the higher settlements rankings (where a rank of 1 is the top of the rank). It is considered that the settlements of Fleetwood, Poulton-le-Fylde, Cleveleys, Thornton and Normoss are appropriately identified within the settlement hierarchy as Urban Towns.
- 2.1.7 The remainder of the borough’s settlements sit within the rural area. Garstang is the highest ranking rural settlement (ranked fourth overall) and is the main service centre in rural Wyre. It is considered that Garstang is different in nature than any of the other rural settlements and is appropriately defined as a Key Service Centre.
- 2.1.8 Rural Service Centres form the third tier of the hierarchy and tend to be the larger rural settlements (outside of Garstang) with access to services and facilities, public transport and jobs. Knott-End/Preesall, Great Eccleston, Catterall and Hambleton are grouped within the settlement rankings at positions six to eight (Knott-End/Preesall and Great Eccleston are ranked joint sixth) respectively. It is considered that these settlements are appropriately collectively defined as Rural Service Centres.
- 2.1.9 Main Rural Settlements form the fourth tier of the hierarchy and include ten settlements which are smaller than those defined as Rural Service Centres but providing some access to services and facilities, albeit to a lesser extent than the

² Submission Document Library Reference ED114

³ Submission Document Library Reference ED115

Rural Service Centres. The Main Rural Settlements occupy places nine to 17 within the settlement ranking and it is considered are appropriately positioned within the hierarchy.

- 2.1.10 The remaining five identified settlements are defined as Small Rural Settlements. These are small settlements with limited access to services and facilities. They occupy the bottom positions of the hierarchy and as such it is considered that they are appropriately defined within the hierarchy.
- 2.1.11 It is a characteristic of Wyre that the large rural part of the borough contains a range of hamlets, scattered groups of dwellings, and dispersed settlements such as Out Rawcliffe. The small scale and dispersed nature of these places means that they have not been identified through the use of settlement boundaries. Accordingly, these settlements are categorised for the purposes of the hierarchy as 'Other Undefined Rural Settlements' and they are 'washed over' by the countryside designation (Policy SP4).
- 2.1.12 In conclusion, it is the Council's view that the settlement hierarchy is based upon a robust evidence base and is largely reflective of the Settlement Study.

2.2 *Should Inskip be designated as a 'Main Rural Settlement'?*

- 2.2.1 Yes it should.
- 2.2.2 Inskip is correctly identified as a "Main Rural Settlement".
- 2.2.3 Settlements within this category occupy a middle ground between the 'Rural Service Centres' (higher up the hierarchy – more populous, greater access to services/facilities and employment) and 'Small Rural Settlements' (lower in the hierarchy – less populous, with less access to service/facilities and employment). The 'Main Rural Settlements' occupy places nine to 17 within the settlement ranking as defined by the Settlement Study⁴ and it is considered are appropriately positioned within the hierarchy.
- 2.2.4 Inskip sits towards the lower end of the ranking – position 15 – within this particular group of settlements. The village hosts a primary school, recreational facilities, church, community hall and public house. There is access to a regular bus service. It ranks higher in population terms than six of the other settlements within this category (Bilsborrow, St. Michaels, Bowgreave, Forton, Preesall Hill and Scorton).
- 2.2.5 Irrespective of proposed housing growth at Inskip, the designation of the settlement as 'Main Rural Settlement' is appropriate and justified. Taking into account proposed growth, the settlement remains within the same category.

2.3 *Is the amount of development within each level of the hierarchy justified?*

- 2.3.1 Yes, it is.

⁴ Submission Document Library Reference ED114

- 2.3.2 Policy SP1 section 2 directs that where possible, settlements higher up in the hierarchy should accommodate more development than lower in the hierarchy. In reality however the distribution of development in the Local Plan is fundamentally directed by highway constraints and, to a lesser extent, flood risk. The hierarchy in Policy SP1 reflects their position taking into account proposed growth in the Local Plan.
- 2.3.3 It is the role of the Local Plan to set out how development needs should be accommodated during the Plan period. There are no rules that would inhibit the Local Plan from identifying through due process any settlements for growth. Nevertheless, development is significantly directed towards settlements occupying higher positions within the hierarchy – with over 50% of residential and employment growth taking place in the ‘Urban Towns’ and Garstang (Key Service Centre). There is a relatively even distribution between the categories of ‘Rural Service Centre’ and ‘Main Rural Settlement’ reflecting the specific constraints and land availability. As may be expected relatively limited development is proposed in ‘Small Rural Settlements’.

2.4 ***Is there sufficient alignment between housing and employment at different levels of the hierarchy?***

- 2.4.1 Yes there is.
- 2.4.2 Policy SP1 shows that there is broad alignment between housing and employment growth within the settlement hierarchy (table in section 2).
- 2.4.3 At lower levels in the hierarchy, this alignment appears less apparent, however employment growth is either proposed at neighbouring higher order settlements through allocations or existing commitments. In addition there are allocations and existing commitments within the wider countryside outside settlement boundaries.
- 2.4.4 With regards to the ‘Main Rural Settlements’ tier, it appears that there is a big discrepancy between housing and employment growth. However employment growth in the ‘Rural Service Centres’ and ‘Other Undefined Rural Settlements’ tiers is higher than housing growth and would serve also Main Rural Settlements.
- 2.4.5 Settlements along the A6 corridor (Barton, Bilsborrow, Bowgreave) can access employment at Catterall and Garstang. In relation to Forton, a specific employment provision is made within the mixed use allocation SA3/4. In relation to Inskip, in addition to employment opportunities along the A6, Nightjar (on Higham Side Road) is an employment site to the south of the village. In relation to Stalmine, there is an allocation north of Stalmine at Pressall Hill. There is a new employment area outside Stalmine off Back Lane, as well as other employment opportunities in the wider rural area.
- 2.4.6 Within the ‘Other Undefined Rural Settlement’ tier, the proportion of employment growth appears artificially high compared to housing growth. This tier includes the wider countryside and employment provision, including the two allocations (SA2/1 and SA2/2), support higher order settlements.

Issue 3 – Settlement Boundaries and the Countryside

3.1 *Are the requirements of Sections 4 and 5 within Policy SP1 too restrictive?*

3.1.1 No they are not.

3.1.2 The countryside is defined as the area outside defined settlement boundaries in Policy SP1 and designated Green Belt areas. It includes a number of undefined settlements comprising dispersed communities, hamlets and isolated groups of dwellings and where nearly all services and facilities must be accessed in settlements higher up the hierarchy.

3.1.3 Sections 4 and 5 within Policy SP1 limit development in countryside areas striking the right balance in line with principles of sustainable development. The Local Plan identifies how development needs will be met including extensions to individual settlements. Outside settlements boundaries land is designated either as Green Belt or countryside where only certain categories of development are considered appropriate under policies SP3 and SP4 respectively.

3.1.4 Sections 4 and 5 within Policy SP1 represent a fundamental element of the overall strategy that development should be directed towards identified settlements where there are more opportunities for sustainable transport and links to employment, services and facilities.

3.2 *Is Policy SP4 consistent with national policy particularly in respect of protection of the countryside and conversion of buildings?*

3.2.1 Yes it is.

3.2.2 Paragraph 13 in the NPPF⁵ states that the NPPF constitutes guidance for local planning authorities in drawing up plans. With regards to the countryside one of the Core Planning Principles (5th bullet point in paragraph 17) is 'recognising the intrinsic character and beauty of the countryside'. Further on in paragraph 28 (3rd bullet point), the NPPF supports rural tourism and leisure development which 'respects the character of the countryside'.

3.2.3 As explained in the Council's response to the Inspector's Preliminary Matters and Issues (paragraph 22)⁶ the countryside is an intrinsic part of the character of Wyre. It is also a valuable resource to the economy of Wyre and contributes to the well-being of not only communities living within designated countryside but also communities across Wyre. Policy SP4 recognises and interprets that importance. Having considered how development needs should be met, Policy SP4 seeks to protect the countryside for its intrinsic value. It should however be noted that it is not an absolute protection. Policy SP4 allows certain categories of development.

3.2.4 Policy SP4 in section 4 supports the conversion of buildings but establishes a hierarchy of uses directing conversions towards employment generating uses rather

⁵ Submission Document Library Reference ED013

⁶ Examination Document Library Reference EL1.001b

than residential. The NPPF makes specific reference to the conversion of building with regards to the rural economy (paragraph 28 first bullet point). The conversion of rural buildings to employment generating uses assist in the sustainability of the rural economy and creates opportunities for rural communities to access employment closer to home.

- 3.2.5 Notwithstanding section 4, section 2 details the types of residential development that would be allowed – sections 2e and 2g relating to affordable housing and rural workers dwellings respectively.
- 3.2.6 It is considered that Policy SP4 strikes the right balance and it is consistent with the NPPF.

Issue 4 – Strategic Areas of Separation

4.1 *Is the principle of Strategic Areas of Separation justified and consistent with national policy?*

- 4.1.1 Yes it is.
- 4.1.2 The NPPF in one of the Core planning principles (paragraph 17), recognises that different areas have different roles and character. In section 7 the NPPF recognises concepts such as ‘strong sense of place’ and responding to local character and history’ (paragraph 58).
- 4.1.3 Wyre includes many separate settlements with their own distinct character, identity and history. In turn this is an intrinsic part of the character of Wyre. It is important that whilst it is accepted that some settlements will grow, their distinct identity is not lost. It is a fundamental element in the Local Plan Strategy hence its inclusion in Policy SP1.

4.2 *Is the Strategic Area of Separation between Fleetwood and Thornton justified?*

- 4.2.1 Yes it is.
- 4.2.2 As explained in the Council’s response to the Preliminary Matters⁷, the identified area performs the role of separating Fleetwood from Thornton and therefore justified.

4.3. *Is the Strategic Area of Separation between Cabus and Garstang justified?*

- 4.3.1. Yes it is.
- 4.3.2. Cabus is a separate settlement from Garstang with separate history. The focus of the Cabus community is its community hall. Any expansion of Garstang should not result in Cabus losing its distinct identity.

⁷ Examination Document Library Reference EL1.001b, para. 17

4.4. Is the Strategic Area of Separation between Forton and Hollins Lane justified?

4.4.1. Yes it is.

4.4.2. Forton and Hollins Lane were recognised as separate settlements in the 1999 Local Plan. This position remains correct and was confirmed through discussions with the Parish Council representatives.

4.4.3. As explained in the Council's Response to Preliminary Matters⁸, although the two settlements will effectively only be separated by the A6 road in the south, this strengthens the need for a Strategic Area of Separation to prevent any further coalescence in the future.

Issue 5 – Green Belt

5.1 Have exceptional circumstances been demonstrated to justify the alteration to Green Belt boundaries?

5.1.1 Yes they have been.

5.1.2 This is explained in the Council's Response to Preliminary Matters⁹ with reference to the Green Belt Study¹⁰ and in the Green Belt Background Paper¹¹. The two areas of Green Belt that are removed represent irregularities, in the sense that the Council considers that this land should not have been designated in the first place and this demonstrates exceptional circumstances.

5.2 How should the LP be modified to demonstrate exceptional circumstances, assuming that such circumstances have been justified?

5.2.1 A modification is proposed to the Local Plan to amend paragraph 5.4.1 and add a new paragraph to explain the exceptional circumstances.

5.3 Is there a justification for the removal of more land from the Green Belt e.g. land at Norcross Lane?

5.3.1 No, there is no justification for the removal of more land from the Green Belt.

5.3.2 The Green Belt in Wyre was established in the Central and North Lancashire Structure Plan and forms part of the Green Belt for the Fylde Peninsula¹². The prime function for the designation of the Green Belt was the separation of different towns on the peninsula.

5.3.3 In Wyre the Green Belt is very narrow and thus sensitive. There are places where towns have already merged as in Thornton and Cleveleys to the north of the Victoria Road roundabout on the A585. The effectiveness of the gap to the south of

⁸ Examination Document Library Reference EL1.001b, para. 17

⁹ Examination Document Library Reference EL1.001b, para. 18

¹⁰ Submission Document Library Reference ED109 a,b,c & d

¹¹ Submission Document Library Reference ED008

¹² The Fylde Peninsula refers to the areas covered by Blackpool, Fylde and Wyre Councils.

the round-about is also compromised by development in Cleveleys abutting the A585.

- 5.3.4 The Green Belt Study¹³ shows in Table 2 page 23 that most parcels play a significant role¹⁴ in preventing neighbouring town from merging together. Five parcels play a less than significant role in preventing neighbouring towns merging. Three of the parcels (numbers 2, 20 and 21) are the three parcels that are proposed to be released from the Green Belt. The other two parcels (numbers 4 & 19) have a moderate role with regards to preventing neighbouring towns merging but have a significant role in controlling urban sprawl.
- 5.3.5 The removal from the Green Belt of parcels which have a significant role against any of the five purposes of the Green Belt will in turn have a significant adverse impact on the integrity and function of the Green Belt. Where the significant impact relates to the function of preventing neighbouring towns from merging, this has strategic implications for the Green Belt on the Fylde Peninsula. This would include most parcels including land at Norcross Lane. It is considered that such alterations which have a greater than local impact should be informed by a strategic review of the Green Belt on the Fylde Peninsula to be undertaken jointly with Blackpool and Fylde Councils.
- 5.3.6 The fact that the Local Plan does not meet in full the identified development needs does not justify the removal of further land from the Green Belt in Wyre. As outlines above the physically limited nature of the Green Belt in Wyre is such that the harm to the integrity of the Green Belt from loss does not outweigh the shortfall.

5.4 *Is Policy SP3 consistent with national policy?*

- 5.4.1 Yes it is.
- 5.4.2 The wording in Policy SP3 largely repeats national Policy. As such the policy is consistent with national policy. As noted in the Council's Response to Preliminary Matters¹⁵ the Council is proposing a modification to Policy SP3 to remove detail of the types of development that constitute appropriate development in the Green Belt.
- 5.4.3 Although development permitted under Policy SP3 sections 5 and 6 would be inappropriate development, this is justified by exceptional circumstances as explained in the Council's Response to Preliminary Matters¹⁶.

Issue 6 – Health and Well-Being

6.1 *Is Policy SP8 clear to the decision maker, particularly in relation to the need for Health Impact Assessments and assessing the negative and positive impacts of development on health?*

¹³ Submission Document Library Reference ED109 a,b,c & d

¹⁴ Significant role is shown as a score of 3 in Task 2B: Prevent neighbouring towns merging (See Site Assessment Methodology in Appendix 1).

¹⁵ Examination Document Library Reference EL1.001b, para. 20

¹⁶ Examination Document Library Reference EL1.001b, para. 20

6.1.1 Yes it is.

6.1.2 Policy SP8 is a strategic policy responding to the health issues including pollution, obesity & mental health. Other policies in the Local Plan including Core Development Management Policies, specific allocation policies and Policy HP9 seeks to address specific health related issues.

6.1.3 It is a matter for the applicants to consider the health implications of proposed development. The Council will prepare guidance expanding on aspects of this policy.