

## WYRE LOCAL PLAN EXAMINATION

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

#### **MATTER 8** **Allocations – Poulton-le-Fylde**

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#### **Issue 1 – Identification of Sites**

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**1.1 *Is the approach within the Strategic Housing Land Availability Assessment (SHLAA) to assessing the suitability and screening of sites in Poulton-le-Fylde robust?***

1.1.1 Yes, it is.

1.1.2 The approach within the SHLAA to assessing the suitability and screening of sites in Poulton-le-Fylde is the same as the approach in relation to all other settlements in Wyre. As summarised in the paragraphs below, the SHLAA provides a robust and detailed analysis of potential land supply for residential development in the various settlements including Poulton-le-Fylde. The SHLAA has utilised appropriate data sources and conducted a detailed but proportionate analysis which has produced sound outcomes.

1.1.3 The methodology employed in the SHLAA<sup>1</sup> is broadly consistent with national planning practice guidance “Housing and Economic land Availability Assessment”<sup>2</sup>. Any deviations are explained and justified at page 6 of the SHLAA. Pages five to 15 of the SHLAA describe the study methodology which is based on two main elements:

- a) *Site identification* – sites were identified from a range of sources – the 2010 SHLAA, two call for site exercises held by the Council in 2012 and 2014, the Issues and Options consultation of 2015, and internal survey work.
- b) *Site assessment* – after an initial assessment of planning status, sites were assessed in three stages – two suitability stages (basic parameters and detailed assessment) and an availability stage. At each stage sites considered not to be suitable took no further part in the process (they were “sieved out”). Availability drew on information from the call for sites exercises and an extensive process of engagement with known landowners. Sites with a planning permission were assumed to be suitable and available.

1.1.4 To inform the assessment of site suitability, the Council captured information on a wide range of factors for each site, including policy constraints,

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<sup>1</sup> Submission Document Library Reference ED089

<sup>2</sup> Submission Document Library Reference ED014

ecological and environmental designations, environmental matters such as the presence of contaminated land, agricultural land classification, heritage features, potential land use conflicts and physical constraints. This process was informed by the use of GIS-mapping, site visits and consultation with internal technical officers.

1.1.5 Sites “sieved out” of the 2010 SHLAA were reassessed as part of the process.

1.1.6 The SHLAA at pages 15 – 18 describes the assessment outcomes. It shows that 344 sites were identified through the initial assessment. Of these, 11 were completed housing developments and 168 sites were deemed to be unsuitable for residential development. A further 21 sites were considered to be suitable but availability could not be confirmed. Overall, including sites under construction and with a planning permission, the assessment identifies a suitable and available supply of 144 sites with an estimated capacity of 10,751 dwellings. As noted at page 17 of the assessment, the vast majority of this supply lies outside of settlements in areas of countryside. The SHLAA does not use the countryside designation as a reason for sieving out sites – the designation of countryside being a matter for the emerging local plan. It is also explained at page 17 that the SHLAA does not have regard to the Local Plan evidence on highway matters<sup>3</sup>.

1.1.7 The SHLAA identifies a total of 40 sites in Poulton-le-Fylde as summarised below:

	<b>Category</b>	<b>Sites</b>
1	Under construction*	4
2	Planning permission**	7
3	Not suitable (basic parameters)	22
4	Not suitable (detailed assessment)	1
5	Not available	0
6	Final suitable and available	6
	TOTAL	40
7	All final sites (sum of 1, 2 and 6)	17

\* Includes technical starts. \*\* includes sites where planning permission is pending the signing of a legal agreement (aka. Minded to Approve)

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## **Issue 2 – South East of Poulton-le-Fylde (SA1/5)**

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### **2.1 What is the up to date position in relation to applications/permissions affecting the site(s)?**

2.1.1 The planning application/permission position is as follows as of 31<sup>st</sup> March 2018 (see plan at Appendix A).

- Parcel A – outline planning permission granted 5 February 2018 to The Strategic Land Group for up to 108 dwellings on some 3.87 hectares, planning application reference 16/00742.

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<sup>3</sup> Submission Document Library Reference ED094a.

- Parcel B – outline planning permission granted 12 April 2017 to Hollins Strategic Land for up to 130 dwellings on some 4.16 hectares, planning application 16/01043.

2.1.2 The permissions are for two separate areas of land that together cover the whole of the allocation.

**2.2 *Are all the Key Development Considerations necessary and clear to the decision maker?***

2.2.1 Yes, they are.

2.2.2 The Council has responded to the Inspector’s preliminary questions regarding allocations<sup>4</sup> in relation to the key development considerations and proposed modifications to improve the format of the policies.

2.2.3 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.

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**Issue 3 – South of Blackpool Road, Poulton-le-Fylde (SA1/8)**

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**3.1 *Have exceptional circumstances been demonstrated for removal of the site and adjoining land from the Green Belt?***

3.1.1 Yes they have.

3.1.2 This is explained in the Council’s Response to Preliminary matters<sup>5</sup> with reference to the Green Belt Study<sup>6</sup> and in the Green Belt Background Paper<sup>7</sup>. 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.

**3.2 *Does the site play a role in preventing Poulton and Carleton merging into one another?***

3.2.1 Carleton is considered to be part of Poulton-le-Fylde. It is not defined as a separate settlement within the Wyre Settlement Study<sup>8</sup> and was not defined as a separate settlement in the 1999 Wyre Local Plan<sup>9</sup>.

3.2.2 The Green Belt was established in the Central and North Lancashire Structure Plan (1983). As referred to in the Green Belt Study<sup>10</sup> (page 7) the structure

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<sup>4</sup> Examination Document Library Reference EL1.002b, paragraph 42

<sup>5</sup> Examination Document Library Reference EL1.001b, paragraph 18

<sup>6</sup> Submission Document Library Reference ED109 a,b,c & d

<sup>7</sup> Submission Document Library Reference ED008

<sup>8</sup> Submission Document Library Reference ED114

<sup>9</sup> Submission Document Library Reference ED122

<sup>10</sup> Submission Document Library Reference ED109 a,b,c & d

plan makes no reference to Green Belt between Carleton and Poulton-le-Fylde.

**3.3 *On the assumption that the land should be removed from the Green Belt, should the size of the allocation be increased to include 'white land' to the west?***

3.3.1 No it should not.

3.3.2 The Council has maximised allocations in Poulton-le-Fylde within the context of the highways cap set by the highway evidence<sup>11</sup>. Increasing the size of the allocation is not supported by the highway evidence.

**3.4 *Would the requirement for a masterplan prejudice delivery of the site?***

3.4.1 No it would not.

3.4.2 Within the context of meeting development needs, it is important that development takes place in a manner that respects and integrates well with existing settlements and creates high quality environments for future occupiers and current residents. The requirement for a masterplan allows flexibility in determining the distribution of permitted uses across the site, in this case the location of the school.

3.4.3 The process for requiring the preparation of a masterplan is set out in the Local Plan (SD004) paragraph 9.1.5-9.1.6. Bringing the site forward within the context of an overall masterplan will avoid piecemeal development which could undermine the successful delivery of the whole site and prejudice the delivery of key infrastructure, including social infrastructure and highway works.

3.4.4 The preparation of a masterplan requires all landowners to work together and involve stakeholders. Although masterplans will be prepared by developers/landowners, the Council expects to have a role in facilitating the process and providing a steer. The Council will proactively work with landowners to bring forward the required master plans.

3.4.5 A masterplan will assist in the smooth progression of subsequent planning applications. Masterplanning is therefore considered to provide beneficial outcomes for the development of a site and the development management process.

**3.5 *Can development of the allocation be mitigated so that it would not lead to severe transport/highway impacts?***

3.5.1 Yes it can.

3.5.2 The allocation at Poulton-le-Fylde sits within the highway cap established by

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<sup>11</sup> Submission Document Library Reference ED094a

the highways evidence<sup>12</sup>. It is expressly subject to the delivery of the Poulton Highway Mitigation Strategy<sup>13</sup> which has been informed by the Poulton-le-Fylde Congestion Study<sup>14</sup>.

3.5.3 With specific reference to this site it requires the delivery of a town centre car park as part of the allocation. The measures identified within the Poulton Mitigation Strategy are reflected in the Infrastructure Delivery Plan (IDP)<sup>15</sup> and will be financed through developer contributions.

### **3.6 *Are all the Key Development Considerations necessary and clear to the decision maker?***

3.6.1 Yes, they are.

3.6.2 The Council has responded to the Inspector's preliminary question<sup>16</sup> in relation to the key development considerations and proposed modifications to improve the format of the policies.

3.6.3 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.

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## **Issue 4 - Infrastructure**

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### **4.1 *Will the infrastructure to support the scale of development proposed in the settlement be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?***

4.1.1 Yes it will be.

4.1.2 The Local Plan is supported by an Infrastructure Delivery Plan (IDP)<sup>17</sup> that sets out the level of new or improved infrastructure required to deliver the Local Plan. It has been produced through a proactive and on-going process of engagement with all infrastructure providers, including those involved in delivering health, education, utility and highway infrastructure.

4.1.3 Open space is recognised as a part of the borough's infrastructure. The Local Plan, through Policy CDMP4 and HP9, provides the policy basis for the provision of Green Infrastructure, both on and off site as appropriate.

4.1.4 Section 23 of the IDP sets out a schedule of infrastructure requirements, with costings and delivery agencies identified where known. This includes the

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<sup>12</sup> Submission Document Library Reference ED094a

<sup>13</sup> Submission Document Library Reference ED094a, page 62 and Appendix C of the Local Plan

<sup>14</sup> Submission Document Library Reference ED096

<sup>15</sup> Submission Document Library Reference ED004

<sup>16</sup> Examination Document Library Reference EL1.002b, paragraph 42

<sup>17</sup> Submission Document Library Reference ED004

need for additional primary school places in Poulton-le-Fylde. This is reflected in allocation SA1/8 which requires land to be set-aside within the allocation to facilitate this requirement as an integral part of the proposed development. The IDP and SA1/8 reflect the need for development in Poulton to contribute to the Poulton Mitigation Strategy, including the development of a town centre car park within the allocation itself. The Council will continue to work with infrastructure providers to ensure that the right infrastructure will be delivered in the right place and at the right time.

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## Issue 5 – Delivery

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### **5.1 *Are the assumptions about the rate of delivery of houses from the allocations realistic?***

5.1.1 Yes, they are.

5.1.2 The updated housing trajectory in appended to the Council's statement on matter 4, this shows the anticipated delivery rates for each allocation. There is nothing to prevent sites coming forward in a different manner to that set out in the trajectory, for example if a site is selling faster than expected a faster build out rate could be achieved. Equally, there may be a delay in a site commencing if unanticipated issues that require to be addressed emerge in early survey work.

5.1.3 The trajectory is a representation in time of expected delivery using annual monitoring and information received from land owners/agents/developers.<sup>18</sup> The outcome of the monitoring and contact with owners/agents/developers has informed the application of the standard assumptions on build out rates set out in paragraph 7.27 in the Housing Background Paper<sup>19</sup>. The Council has applied planning judgement on available information as to what is considered an average likely lead in and build out rate.

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<sup>18</sup> Agents / developers and landowners were contacted in May / June 2017. A similar exercise has not been possible in 2018.

<sup>19</sup> Submission Document Library Reference ED010

## APPENDIX A

### SA1/5 - South East of Poulton-le-Fylde – Current Planning Position

**Parcel A** – outline planning permission granted 5 February 2018 to The Strategic Land Group for up to 108 dwellings on some 3.87 hectares, planning application reference 16/00742.

**Parcel B** – outline planning permission granted 12 April 2017 to Hollins Strategic Land for up to 130 dwellings on some 4.16 hectares, planning application 16/01043.

