

## WYRE LOCAL PLAN EXAMINATION

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

#### **MATTER 8** **Allocations – Inskip**

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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 Inskip robust?***

1.1.1 Yes, it is.

1.1.2 The approach within the SHLAA to assessing the suitability and screening of sites in Inskip 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 Inskip. 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, 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.

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

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

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

1.1.6 The SHLAA (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 eight sites in Inskip as summarised below:

	<b>Category</b>	<b>Sites</b>
1	Under construction	1
2	Planning permission	0
3	Not suitable (basic parameters)	3
4	Not suitable (detailed assessment)	0
5	Not available	0
6	Suitable and available	4
	TOTAL	8
7	All final sites (sum of 1, 2 and 6)	5

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## **Issue 2 – Inskip Extension (SA1/13)**

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**2.1** *Would any of the following issues in isolation or cumulatively lead to a conclusion that the allocations would not comprise sustainable development:*

- (i) the scale of the allocations relative to the size of the village;*
- (ii) the effect on the character and appearance of the village and the surrounding countryside;*
- (iii) the availability of services and employment within or close to the village, including school places, health services, and convenience store;*
- (iv) choice of modes of travel to access services and jobs;*
- (v) the loss of the best and most versatile agricultural land;*
- (vi) the highway network;*
- (vii) the creation of inclusive and mixed communities*
- (viii) flood risk and drainage;*
- (ix) biodiversity impacts; and,*
- (x) climate change implications.*

2.1.1 No, they would not.

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

- 2.1.2 The Site Allocations Background Paper<sup>4</sup> establishes the rationale for the allocation of SA1/13 – Inskip Extension (pages 59 to 63). It describes a process of identifying a “long list” of potential sites and a consideration of site attributes, including constraints. It describes the fact that SA1/13 is the most suitable site for allocation, being free of any significant constraints and available for development. It is the Council’s position that the development of site SA1/13 will comprise sustainable development.
- 2.1.3 Since the ‘Publication’ draft Local Plan was published in September part of the site has received outline planning permission for residential development and retail (convenience). The residential component now has the benefit of a reserved matters approval for 55 dwellings within the allocation on a split site that straddles Preston Road (see the Council’s response to the Inspector’s Preliminary Questions and Comments on Allocations, paragraph 41, EL1.002b).
- 2.1.4 The Statement of Consultation<sup>5</sup> provides a response to all but one of the matters raised above. In summary, the Council’s position is that the proposed allocation at Inskip (site SA1/13) would comprise sustainable development. It should be noted as referred to in Matter 2 Issue 1 that the distribution of development across the Borough including Inskip was influenced by the significant highway capacity constraints as established in highway evidence<sup>6</sup>.

***The scale of the allocations relative to the size of the village***

- 2.1.5 There is not a justification for non-allocation of a site due to scale relative to the existing settlement when taking into account the requirement to meet objectively assessed needs in full and the significant constraints in Wyre. There is nothing in national planning guidance that would restrict the extension of existing settlements. Throughout history places grow and change as needs arise.
- 2.1.6 The important consideration is that extensions to settlements is well planned and result in sustainable developments. The allocation policy at Inskip includes a provision for the preparation of a masterplan to ensure that the extension to the settlement is well planned and makes provision for necessary infrastructure such as school places, a convenience store and village green.

***The effect on the character and appearance of the village and the surrounding countryside***

- 2.1.7 The development of site SA1/13 will change the character and appearance of the settlement and immediate surrounding countryside from certain viewpoints. The Local Plan includes policies, (CDMP3, CDMP4 parts 14-16), to ensure that development is sensitively designed that respects the character and appearance of the settlement and the surrounding countryside. The specific allocation policy SA1/13 requires that development should come forward through a masterplan with the development forming an organic extension to the village, with particular attention given to the nature and quality of boundary treatments.

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<sup>4</sup> Submission Document Library Reference ED012a

<sup>5</sup> Submission Document Library Reference SD007h, Appendix 16

<sup>6</sup> Submission document Library Reference ED090 to ED097

***The availability of services and employment within or close to the village, including school places, health services, and convenience store***

- 2.1.8 It is appreciated that Inskip does not have the level of service provision of villages such as Great Eccleston and Hambleton – hence why these villages are classed as “Rural Service Centres” in the settlement hierarchy. However, Inskip residents have access to services and facilities – a primary school, community halls, public house, church and public open space/recreation options - in the village itself<sup>7</sup>. A wider range of services and facilities, including health and local retail provision, are a short distance away in Great Eccleston which is accessible by a regular bus service (as is Preston).
- 2.1.9 The Council has considered the implications for infrastructure requirements from individual development proposals as set out in the Infrastructure Delivery Plan<sup>8</sup> and reflected in individual allocation policies. Allocation Policy SA1/13 requires the expansion of the primary school at Inskip, the provision of a convenience store<sup>9</sup> and village green.
- 2.1.10 It is inevitable that residents in smaller settlements will mainly if not wholly access employment outside the particular settlement, although in respect of Inskip there is a small employment area (Nightjar) directly south of the settlement. To support the borough’s economy, the Local Plan makes provision for 43 hectares of employment land across the borough, this includes the allocation of 3.92ha of land within the rural area. The allocation of 1 hectare of employment land at the neighbouring higher order settlement of Great Eccleston will provide rural employment opportunities in the wider area.

***Choice of modes of travel to access services and jobs***

- 2.1.11 Currently there are two bus services serving Inskip. The no. 77 (previously no. 80) operates approximately every two hours throughout the morning to early evening weekdays and Saturday providing connectivity to Preston town centre (some 30 minutes journey time) and Blackpool (some 50-70 minutes journey time) via Great Eccleston (some 12 minutes journey time) and Poulton-le-Fylde (some 24 minutes journey time). The no. 77A operates between Preston to Myerscough College (and return) Monday to Saturday. The journey time between Inskip and Myerscough College is approximately 24 minutes. Combining both services, provides an hourly service Monday to Saturday between Preston and Inskip (and return) which is considered a reasonable service. In addition, a school bus service provides connectivity to Garstang High School.

***The loss of the best and most versatile agricultural land***

- 2.1.12 The National Planning Policy Framework (NPPF)<sup>10</sup> advises that local planning authorities should seek to locate development on poorer quality agricultural land in preference to areas of higher quality. The NPPF does not require that high

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<sup>7</sup> Submission Document Library Reference ED114

<sup>8</sup> Submission Document Library Reference ED004

<sup>9</sup> Outline planning permission has been granted for a convenience store as part of a residential development for 55 dwellings on part of the site

<sup>10</sup> Submission Document Library Reference ED013, paragraph 10

agricultural land should not be lost or that exceptional circumstances should be demonstrated. The NPPF however requires that local authorities to boost significantly the supply of housing and to make provision in their Local Plans to meet their needs in full, (paragraph 47).

2.1.13 Wyre is a borough with a very limited supply of previously developed land. Inevitably agricultural land is required to meet identified needs. As noted in under Matter 1 the distribution of development in the Local Plan is influenced by constraints and in particular highway constraints.

2.1.14 Site SA1/13 is located within an area of Grade 2 (very good quality) agricultural land. Wyre contains some 8,367 hectares of Grade 2 agricultural land<sup>11</sup> which means SA1/13 represents a minimal loss of 0.2% of the total Grade 2 land. It should be noted that most land outside the Forest of Bowland AONB and the urban areas is either Grade 2 or 3. The land around Inskip is Grade 2 and 3.

2.1.15 Although the preference is that the least-best quality is developed, this is not always possible and a balance has to be struck between meeting development needs and the loss of agricultural land. It should be noted that the Local Plan does not fully meet its objectively assessed need for housing.

### ***The highway network***

2.1.16 The highways evidence prepared by Lancashire County Council<sup>12</sup> considers the nature and capacity of the local highway network. At page 45 it describes the villages of St Michaels and Inskip as falling within the n2 - A6 Restriction Zone (pages 42-43). It advises that a maximum of 200 dwellings (over and above commitments as at February 2017) should be allocated within this zone – a restricted level of development due to the acknowledged impact of significant development on rural roads through villages.

2.1.17 The evidence states that School Lane (Inskip) is narrow and that a development of significant scale must address this through a Transport Assessment. In this regard it is noted that the development of SA1/13 will be required to meet the requirements of policy CDMP6 Accessibility and Transport. The fact that Wyre has a large rural area with a rural road network has been taken into consideration within the highways evidence.

### ***The creation of inclusive and mixed communities***

2.1.18 As required by policies HP2 and HP3, the allocation of SA1/13 will create a mix of new market and affordable housing and support the development of new social infrastructure in the form of additional school provision new convenience store and village green.

### ***Flood risk and drainage***

2.1.19 The National Planning Framework supports the policy of directing development to areas of least flood risk (NPPF para. 101). Site SA1/13 lies wholly within

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<sup>11</sup> Submission Document Library Reference SD005a, Appendix A, page 17

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

Flood Zone 1 whilst parts of land to the south and east of Inskip lie within Flood Zones 2 and 3 (with 3 being the zone of greatest probability of flooding).

2.1.20 St. Michaels (which is grouped with Inskip with regards to the highway evidence) is extensively covered by Flood Zones 2 and 3. It is the Council's view that the decision to direct development to an area of lowest probability of flooding in Inskip is a sound strategic approach.

2.1.21 The Strategic Flood Risk Assessment (Level 2)<sup>13</sup> has not indicated any reason on the basis of flood risk and drainage to suggest that the site should not be allocated. It should be noted that the Environment Agency and United Utilities have not objected to the allocation. Policy CDMP2 - Flood Risk and Surface Water Management will apply to the development of the site. Moreover the allocation policy requires that residual surface water should drain into Inskip Brook.

### ***Biodiversity impacts***

2.1.22 Although the development of an agricultural field may have some ecological impact, the land in question carries no national or local environmental or ecological designation. Policy CDMP4 will apply to the development of the site and any identified impact will need to be mitigated.

2.1.23 The Local Plan is supported by a Habitat Regulation Assessment (HRA)<sup>14</sup>. Table 11, page 45, identifies no likely significant effects. However as a precautionary principle due to the scale of the allocation, the potential for a project level HRA is identified within the key development considerations. The HRA conclusions has been agreed with Natural England.

2.1.24 Advice has also been taken from the Greater Manchester Ecology Unit in preparing the Plan<sup>15</sup>. Allocation Policy SA1/13 requires that the development should consider ecological impact.

### ***Climate change implications***

2.1.25 Climate change implications are not relevant only to Inskip but relevant across the Borough. They has been an important consideration in the balance in preparing the Local Plan. The NPPF deals with climate change specifically in chapter 10 with reference to flood risk and coastal change, a low carbon future, landscape and biodiversity. As noted in the Council's Response to Preliminary Matters (paragraph 20)<sup>16</sup> climate change is multi facet matter and covered by a number of policies in the Local Plan which will apply in the development of the site.

2.1.26 Climate change matters were also considered through the Sustainability Appaisal<sup>17</sup>.

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<sup>13</sup> Submission Document Library Reference ED111 to ED113

<sup>14</sup> Submission Document Library Reference SD006

<sup>15</sup> Submission Document Library Reference ED100

<sup>16</sup> Examination Document Library Reference EL1.001b

<sup>17</sup> Submission Document Library Reference SD005a

2.1.27 The allocation policy SA1/13 requires the development of the site to be supported by a landscape and green infrastructure strategy, including play facilities, public open space and pedestrian/cycle connectivity. The allocation also requires the provision of a village green.

**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 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.

2.2.3 The Council has responded to the Inspector's preliminary question<sup>18</sup> in relation to the key development considerations and proposed modifications to improve the format of the policies.

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**Issue 3 - Infrastructure**

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**3.1 *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?***

3.1.1 Yes it will be.

3.1.2 The Local Plan is supported by an Infrastructure Delivery Plan (IDP)<sup>19</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.

3.1.3 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. For Inskip there is a requirement for a village green to be provided through the development of the allocation and the required masterplanning process.

3.1.4 Section 23 of the IDP sets out a schedule of infrastructure requirements, with costings and delivery agencies identified where known. This includes the need for additional primary school places in Inskip which is reflected the allocation SA1/13. The allocation policy requires land to be set-aside within the allocation to facilitate this requirement as an integral part of the proposed development. 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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<sup>18</sup> Examination Document Library Reference EL1.002b, paragraph 42

<sup>19</sup> Submission Document Library Reference ED004

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

4.1.1 Yes, they are.

4.1.2 The updated housing trajectory is appended to the Councils 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.

4.1.3 The trajectory is a representation in time of expected delivery using annual monitoring and information received from land owners/agents/developers.<sup>20</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. The Council has applied planning judgement on available information as to what is considered an average likely lead in time and build out rate.

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<sup>20</sup> Agents / developers and landowners were contacted in May / June 2017. A similar exercise has not been possible in 2018.