

WYRE LOCAL PLAN EXAMINATION

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

MATTER 8 **Allocations – Forton and Hollins Lane**

Issue 1 – Identification of Sites

- 1.1 ***Is the approach within the Strategic Housing Land Availability Assessment (SHLAA) to assessing the suitability and screening of sites in the settlements robust?***
- 1.1.1 Yes, it is.
- 1.1.2 The approach within the SHLAA to assessing the suitability and screening of sites in Forton and Hollins Lane 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 Forton and Hollins Lane. 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 SHLAA¹ is broadly consistent with national planning practice guidance “Housing and Economic Land Availability Assessment”². 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.

¹ Submission Document Library Reference ED089

² 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 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 matters³.
- 1.1.7 The SHLAA identifies a total of 12 sites in Forton and Hollins Lane, as summarised below:

	Category	Sites
1	Under construction	1
2	Planning permission	4
3	Not suitable (basic parameters)	0
4	Not suitable (detailed assessment)	0
5	Not available	1
6	Suitable and available	6
	TOTAL	12
7	All final sites (sum of 1, 2 and 6)	11

Issue 2 – Forton Extension (SA3/4)

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, including the gap between Forton and Hollins Lane around Sunny Bank Nurseries;***
- (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;***
- (x) *heritage assets;***
- (xi) *Gas Main Safeguarding; and,***
- (xii) *climate change implications.***

2.1.1 No they would not

³ Submission Document Library Reference ED094a

2.1.2 The Site Allocations Background Paper⁴ establishes the rationale for the allocation of SA3/4 – Forton Extension (pages 63 to 69). 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 SA3/4 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 SA3/4 will comprise sustainable development.

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

2.1.3 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. It is accepted that the allocation at Forton represents a large extension to the village, more than doubling its size (currently there are some 200 dwellings in the village).

2.1.4 The important consideration is that extensions to settlements is well planned and result in sustainable developments. The allocation policy at Forton 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 neighbourhood centre and community hall.

The effect on the character and appearance of the village and the surrounding countryside, including the gap between Forton and Hollins Lane around Sunny Bank Nurseries

2.1.5 The allocation consists of open fields extending north and south from the village broadly along the line of the A6. The development of site SA3/4 will change the character and appearance of the settlement and immediate surrounding countryside from certain view points including along the A6. 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 SA3/4 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.

2.1.6 The Council’s response to Preliminary Matters⁵ (at paragraph 17) deals with appropriateness of the proposed ‘Strategic Area of Separation between Forton and Hollins Lane.

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

2.1.7 It is appreciated that Forton 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, Forton residents

⁴ Submission Document Library Reference ED012a

⁵ Examination Document Library Reference EL1.001b

have access to services and facilities – a primary school, community hall, church and public open space/recreation options - in the village itself⁶. A wider range of services and facilities, including health and local retail provision, are a short distance away in Garstang which is accessible by regular public transport (as is Lancaster).

- 2.1.8 The Council has considered the implications for infrastructure requirements from individual development proposals as set out in the Infrastructure Delivery Plan⁷ and reflected in individual allocation policies. Allocation Policy SA3/4 requires the expansion of the primary school at Forton and the provision of a neighbourhood centre incorporating a community hall, convenience store and health facility (the latter if required).
- 2.1.9 It is acknowledged that residents in smaller settlements in Wyre, inevitably, will mainly if not wholly, access employment outside the particular settlement. However, to support the local 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 Forton will provide rural employment opportunities in the local area. There are also nearby existing employment areas at Hillfoot Farm in Scorton and Cabus Commercial Park located on the A6. The A6 also provides easy access to employment opportunities at Garstang and Catterall, and, to the north, at Lancaster.

Choice of modes of travel to access services and jobs

- 2.1.10 Frequent (at least two per hour week days plus weekend and bank holiday) bus services can be accessed along the A6 directly adjacent to the allocation from two locations. These provide regular service to the A6 villages, Preston and Lancaster, Great Eccleston, Poulton-le-Fylde and Blackpool.

The loss of the best and most versatile agricultural land

- 2.1.11 The National Planning Policy Framework (NPPF)⁸ 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 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).
- 2.1.12 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.
- 2.1.13 100% of the allocation lies in an area of Grade 3 agricultural land. Wyre contains some 12,088 hectares of Grade 3 agricultural land⁹. It is noted that the impact of the allocation on the supply of Grade 3 agricultural land by the development of SA3/4 is

⁶ Submission Document Library Reference ED114

⁷ Submission Document Library Reference ED004

⁸ Submission Document Library Reference ED013, paragraph 10

⁹ Submission Document Library Reference SD005a, Appendix A, page 17

minimal in the context of the overall supply. Also it should be noted that most land outside the Forest of Bowland AONB and the urban areas is either Grade 2 or 3.

- 2.1.14 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

- 2.1.15 Access to the highway network will be a detailed matter for consideration during the masterplanning and detail planning application stages. The highway evidence¹⁰ indicates that carriageway and junction improvements are likely to be required but identifies no overriding matters that would prevent development. It is noted that the majority of the site lies along or is easily accessible to the A6.

The creation of inclusive and mixed communities

- 2.1.16 The allocation of SA3/4 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 and neighbourhood centre including convenience retail provision and community hall. The allocation also provides for the development of new local employment provision.

Flood risk and drainage

- 2.1.17 The National Planning Framework¹¹ supports the policy of directing development to areas of least flood risk (NPPF para. para. 101). Site SA3/4 lies wholly within Flood Zone 1. It is the Council's view that the decision to direct development to an area of the village with the lowest probability of flooding is a sound strategic approach.
- 2.1.18 As part of its evidence base, the council has produced a detailed Strategic Flood Risk Assessment (Level 2)¹². This found no reasons 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 of the site.
- 2.1.19 Policy CDMP2 - Flood Risk and Surface Water Management will apply to the development of the site. Moreover the allocation policy SA3/4 requires that residual surface water should drain into the Lancaster canal.

Biodiversity impacts

- 2.1.20 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. The Local Plan is supported by a Habitat Regulation Assessment (HRA)¹³. Table 11, page 50, identifies no likely significant effects. The HRA conclusions has been agreed with Natural England. Advice has also been taken

¹⁰ Submission Document Library Reference ED094a, page 47

¹¹ Submission Document Library Reference ED013

¹² Submission Document Library Reference ED111 a-i, ED112 and ED113

¹³ Submission Document Library Reference SD006

from the Greater Manchester Ecology Unit in preparing the Plan¹⁴. Policy CDMP4 Environmental Assets parts 10-13 (habitats, species and ecological networks) will apply to the development of the site. Furthermore Policy SA3/4 requires that the development should consider any ecological impact.

Heritage assets

2.1.21 There are four listed (grade II) structures associated with Forton United Reform Church, that lie directly adjacent to the allocation South of School Lane (West of Winder Lane). The structures are:

- Forton United Reform Church
- C19 mounting block in churchyard wall north of United Reformed Church.
- Former school building within the church yard
- Chest tomb within the church yard

2.1.22 The council is of the opinion that the masterplanning exercise required by Policy SA3/4 provides an appropriate mechanism to consider any impact on heritage assets from the development of SA3/4. Policy CDMP5 Historic Environment will apply to the development of the site.

Gas Main Safeguarding

2.1.23 The Site Allocations Background Paper¹⁵ at page 68 and 69 provides an update of the position with regards to the matters of gas main safeguarding. It clarifies that the Council understand that this is no longer considered to be a constraint to the development of site SA3/4.

Climate change implications

2.1.24 Climate change implications are not relevant only to Forton but relevant across the Borough. They have 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)¹⁶ climate change is a multi-faceted matter and covered by a number of policies in the Local Plan which will apply in the development of the site.

2.1.25 Climate change matters were also considered through the Sustainability Appraisal¹⁷.

2.1.26 The allocation policy SA3/4 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. SA3/4 also requires the provision of local facilities at Forton including a neighbourhood centre with community hall. As noted above, Forton has good access to Garstang, Preston and Lancaster.

¹⁴ Submission Document Library Reference ED100

¹⁵ Submission Document Library Reference ED012a

¹⁶ Examination Document Library Reference EL1.001b

¹⁷ Submission Document Library Reference SD005a

2.2 Do the existing bowling green and playground need to be included in the allocation and/or relocated?

2.2.1 Yes they do.

2.2.2 The Council's response to Preliminary Questions¹⁸ explains why the bowling green and playground were included in the allocation. This is also explained in the Site Allocations Background Paper¹⁹. The council has held discussions with the owners of the land in question who are a charitable body. The charity has agreed to the allocation at the request of the council in order to play a full and active part in discussions regarding the masterplan, recognising that the allocation of the land in question will allow for flexibility as to the most appropriate location within the village for the uses involved. The land occupied by the recreation facility has not been included in the calculation of the allocated residential capacity.

2.3 Are the extent of the allocations and their capacity appropriate?

2.3.1 Yes they are.

2.3.2 The allocation covers 29.63 hectares with a capacity as established by the Publication Draft Wyre Local Plan of 468 dwellings. The highway capacity set by the highway evidence²⁰ for Forton is 450 dwellings, with additional "spare" capacity from the adjacent Hollins Lane making up the remainder of the 468 dwellings.

2.3.3 The allocation has been made to ensure that development remains within the limit set by the highway capacity and to ensure that boundaries are clearly defined using features in the landscape (such as field boundaries) and the highway network. At an assumed 30 dwellings per hectare, an additional 15.60 hectares (net) is required to deliver 468 dwellings. This requirement is met by the allocation as follows:

Total site area = 29.63 hectares

Less 1 hectare for employment = 28.63 hectares

Less 1.22 hectares (recreation ground) = 27.41 hectares

Assumed net developable area at 60%²¹ = 16.45ha

2.3.4 Based on these assumptions, the allocated area exceeds the required land take by 0.85 hectares, although this is sensitive to assumptions on density (a lower density requires a higher land take for the residential component). It is noted that 40% of the residential development area (10.96 hectares) is put towards social and physical infrastructure provision including primary school, neighbourhood centre and green infrastructure. The 40% figure allows sufficient flexibility for matters such as Sustainable Drainage Systems, landscape buffers to the A6 and highway works to be fully incorporated into future development. It also allows for the setting of listed buildings to the north west of the site to be properly allowed for in the development of the site and takes into account land to the north of School Lane that is constrained by topography. Overall, the Council is of the view that the allocation is appropriately made.

¹⁸ Examination Document Library Reference EL1.001b

¹⁹ Submission Document Library Reference ED012a, pages 66-67

²⁰ Submission Document Library Reference ED094a

²¹ Submission document Library Reference ED089, page 8

2.4 Would the requirement for a masterplan to be agreed at planning application stage prejudice delivery of the site (or part of it)?

2.4.1 No it will not.

2.4.2 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.

2.4.3 The process for requiring the preparation of a masterplan is set out in the Local Plan²² paragraph 9.1.5-9.1.6. For SA3/4, it is also important to ensure the required housing and employment development is brought forward in a comprehensive and coherent manner. 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.

2.4.4 The preparation of a master plan 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 masterplans. 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.

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

2.5.1 Yes, they are.

2.5.2 The Council has responded to the Inspector's preliminary question²³ in relation to the key development considerations and proposed modifications to improve the format of the policies.

2.5.3 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.

Issue 3 – Hollins Lane (SA1/14 and SA1/15)

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

3.1.1 Yes, they are.

²² Submission Document Library Reference SD004

²³ Examination Document Library Reference EL1.002b, paragraph 42

- 3.1.2 The Council has responded to the Inspector's preliminary question²⁴ in relation to the key development considerations and proposed modifications to improve the format of the policies.
- 3.1.3 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.

Issue 4 - Infrastructure

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)²⁵ 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 need for additional primary school places, a neighbourhood centre and healthcare provision at Forton. These requirements are reflected in SA3/4. 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.

Issue 5 – Delivery

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 is 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/developers²⁶. The

²⁴ Examination Document Library Reference EL1.002b, paragraph 42

²⁵ Submission Document Library Reference ED004

²⁶ Agents / developers and landowners were contacted in May / June 2017. A similar exercise has not been possible in 2018.

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 and build out rate.