

Wyre Council Local Plan Examination

Matter 2 Representation by E. Deegan Local Plan ID 0987

Issue 1 Spatial distribution of development and supporting questions

Issue 2 Settlement hierarchy and supporting questions

Statement concerning Strategy and Strategic policies

The spatial distribution of development

Is the strategy for the distribution of development (described as 'dispersal') justified?

The strategy for the Local Plan for spatial distribution of housing is summarised as being one of dispersal. This follows at least in part from the Option 3 – Dispersal in the Local Plan Issues and Options consultation of 2015. It remains the case that more weight needed to be given to other factors deterministic of a spatial distribution of development. including the three aspects of sustainable development, the different roles and character of different areas and many other criteria set out in national Planning guidance than is apparent in this Plan.

This matter is one which concerns the wider public in particular as the spatial distribution will impact on their town or village to a greater or lesser extent. The Local Plan should be able to assist local communities in considering the methodology and factors used to determine the spatial distribution of development set out in the Plan. The Wyre Local Plan is unsatisfactory in that further work is needed to justify the spatial distribution of development, including addressing the development needs of settlements in the north of the district. .

The evidence submitted for this topic has been written in such a manner as to be virtually impenetrable for local communities. So not only has there been limited opportunity for public engagement regarding the evidence in respect of spatial distribution, the material which has been published is not presented in any form which can be understood with a basic amount of knowledge or understanding of the Wyre area.. The consequence of this is that the level of analysis is at best superficial and confusing, at worst incorrect and misleading. Factors needed to be identified by the Council and then needed to be fully explored and tested for each town and service centre including a mapping of the different constraints and opportunities.

Limited justification has been used. What is lacking in any rigorous attempt at justifying the selected figures for each settlement including an assessment of the potential impact of the amount of development on each settlement. The preferred option does not seem to have been tested in an appropriate way. This would have included matters such as highway and other infrastructure capacity, social and community capacity to absorb the amount of development and so on. The figures for each settlement appear to have been derived as a theoretical model without any real attempt to assess the potential impact of those figures on each settlement, then assess and weigh the benefits and disadvantage at a settlement level. The

implications for infrastructure, service and facility delivery to these new communities needed to be assessed. Potential remediation and mitigation also needed to be addressed. In the case of Inskip, we can find no specific evidence to explain how the figures have been derived and justified other than land ownership and developer preference. This is not the plan-led approach required in the NPPF, rather it is land owner and developer led based on some unknown factors which have given allocation priority to Inskip. Accordingly, we cannot make any meaningful assessment of the validity of the methodology deployed because it is so opaque.

The allocation of 255 units to Inskip is more than dispersal, and appears to be a strategy based on targeting land held by development companies. The main justification offered for this in section 4 is the evidence submitted by Lancashire County Council Highways and the Environment Agency. It is our view that this evidence has unduly influenced the choices made as to the spatial distribution of development. Furthermore, the evidence produced by the County Council is limited to strategic highways network as we have shown above. With regard to the Environment Agency, the Flood Zones can be helpful as an indicator. However, in practice the majority of the Fylde area is liable to food risk and the zones are fluid (as are the water levels which rise and fall within the Fylde area in living memory) and may change when the next flooding occurs as a consequence of any recent flood mitigation measures undertaken elsewhere.

With regard to sustainability, the allocation of sites needed to be based on more robust factors and assumptions as to future roles of different areas. The more urban northern parts of the Borough will continue to provide the majority of services, facilities and jobs. Therefore, by implication the last place to allocate major areas of land release are the small rural villages to the south of the Borough. A strategy of dispersal in our view equals unsustainable development. The Council's own evidence confirms that at present Inskip residents have one of the highest average commutes in Wyre Council area. An additional 200+ houses without any proposed additional small employment areas will only exacerbate this and create an even higher rate of out commuting making the village more unsustainable.

If there are infrastructure constraints identified in the urban areas, then the Local Plan and its accompanying Infrastructure Delivery Plan should together plan for the mitigation of these constraints and in accordance with national Planning guidance (paras 162 and 177 NPPF refer). Infrastructure and development should be planned at the same time. Brownfield sites in the towns and larger villages of the Borough providing a wider range of services (including jobs) should be the focus of the spatial distribution of development. Furthermore, the slow occupation of recently built houses in Inskip is evidence that demand is limited in rural areas. The spatial distribution of housing presented in this Local Plan remains fundamentally unsound.

Unsound: The Plan is not positively prepared or justified as the spatial distribution of development is inconsistent with the principles of sustainable development. The

Plan is not justified as reasonable alternatives are available to the sporadic developer/landowner led development proposed at Inskip. The Plan is not effective as there have been no transparent attempts to find more sustainable solutions with the adjoining authorities. It is not consistent with regard to national policy in respect of the spatial distribution of development concerning sustainability and linking infrastructure with development planning as set out in the NPPF.

Proposed modifications: The Borough Council needs to revise the spatial distribution of development and withdraw the dispersal strategy to housing development. A full re-assessment is required based on a set of sustainability criteria and linking infrastructure and development planning as per national Planning guidance. The accompanying supporting evidence is partial and biased in favour of promoting the Inskip development in the south of the Borough for what appear to be spurious reasons. New housing development can help to regenerate the towns and larger villages to the north through the investment and people it will bring, including existing brownfield sites (previously developed land) .

Settlement hierarchy

- 2.1 Is the position of settlements in the hierarchy within Policy SP1 justified?
- 2.2 Should Inskip be designated as a 'Main Rural Settlement'?
- 2.3 Is the amount of development within each level of the hierarchy justified?
- 2.4 Is there sufficient alignment between housing and employment at different levels of the hierarchy?

The Local Plan Written Statement (at 4.1.15) states that the Local Plan establishes a settlement hierarchy which denotes the role of places within the Borough reflecting the concentration of services and facilities and their accessibility. It goes on to state that the settlement hierarchy has influenced the selection of sites where possible. Inskip residents cannot accept either of these two premises as shall be shown.

The Local Plan proposes a new settlement hierarchy rather than recognising the existing settlement hierarchy. The evidence in support of the new hierarchy is limited and based mainly on a Local Plan Settlement Hierarchy study of 2016.

In that study Inskip was ranked 15th out of a total of 23 settlements the subject of the study. The approach now adopted appears to be at least in part that of retro-fitting settlements to fit the Local Plan proposed site allocations. As recently as August 2016, Inskip was defined as a small rural settlement. The Wyre Local Plan Evidence Base document Settlement Study (August 2016) defines Inskip village as the largest of five settlements within the Parish of Inskip-with-Sowerby (population 455) as lying in Table 2 as a Small Rural Settlement. In the Publication draft Local Plan in September 2017 Inskip had been upgraded in status to that of a Main Rural Settlement. No evidence has been submitted to explain how any improvement to

village services and facilities or accessibility have been upgraded in Inskip within that year 2016-17.

With regard to site selection, the decisions as to how much development for towns and villages needed to be based on the existing settlement hierarchy not a new hierarchy which takes into account the amount of proposed development. The rationale for this includes that a Local Plan is only a Plan not a recognition of any existing situation. Many site allocations do not occur for a whole variety of reasons so to use a hypothetical hierarchy is not only misleading but presumptuous, particularly when it is not supported by any evidence.

The reasons and context for introducing a settlement hierarchy needed to be explained to the local communities. The structure and definition of the settlement hierarchy proposed for the Wyre Council area needed to be set out including the overall methodology for populating the settlement hierarchy, the list of settlements included and excluded from the hierarchy (and reasons for these decisions. An analysis of the settlements included in the hierarchy was required using a range of factors used to determine its role and function and an assessment was required of the information gathered to determine which tier in the hierarchy to place the chosen settlements. The approach used and its outcomes then needed to be tested through the consultation processes associated with the development of the Local Plan.

We have also referred previously to the inconsistent manner in which the Local Plan has elevated St Michaels to the higher order of village but does not allocate any land there. This remains a concern and if the rationale continues to rely on flood risk, water moves very quickly through all natural and unnatural barriers so it is false rationale, Settlements also exist in adjoining authorities which may have potential to be more sustainable than a small village such as Inskip. In this case we have previously referred to the nearby village of Elswick lying within Fylde Borough which may have been a reasonable alternative in the south of the Fylde. Elswick is substantially larger and with a wider range of local services and facilities. It is described by its Parish Council on its website as being a “modern dormitory village, offering a home for residents looking for a quieter, more peaceful lifestyle”. Closer ongoing co-operation with Fylde Borough would have been needed to bring one or more sites forward as an alternative to those in Inskip.

Finally, a good supply of employment land is needed for a healthy economy. It would have been appropriate for some of the areas of search throughout the Borough to have been investigated for employment purposes.

Unsound: The Plan is not positively prepared as the settlement hierarchy is based on the proposed housing allocation rather than the hierarchy dated 2016. Inskip is not a sustainable location for the amount and siting of development proposed, a further unsound aspect of the Plan. The Plan is not justified as we have shown in upgrading the status of Inskip other than the proposed allocation of 255 houses with

very limited additional infrastructure being proposed. The Plan is not effective as more effective joint working with Fylde Borough may have resulted in some development in Elswick to serve the rural south of the Fylde area. The Plan is inconsistent with national policy with regard to the settlement hierarchy as it fails to recognise the different roles and character of different areas.

Proposed modifications: The Submission Draft Wyre Local Plan should be amended to reflect the designation for Inskip as at the 2016 Borough Council designation as a small rural settlement.