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Wyre Local Plan Examination**Matters, Issues and Questions****Statements In Response to Matter 8 As It Concerns Proposals For Inskip****Matter 8****Issues****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 Inskip robust?

The SHLAA states:

General Approach

The methodology adopted for this study has been informed by the National Planning Practice Guidance (NPPG) "Housing and Economic Land Availability Assessment" (March 2014). This new guidance is broadly similar to that published previously in 2007, although it suggests that the assessment of land for housing should be carried out jointly with a similar assessment of land for employment purposes.

The NPPG recognises the importance of the assessment of land availability for the local plan process (para's 1 and 2) in that it provides the basis for the identification of local plan sites to meet objectively assessed needs.

NPPF

'The NPPF further advises that to be considered deliverable, sites should be:

- Available now;*
- A suitable location for development now; and*
- Achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. '*

Only 2 of the sites (INS_02 and INS_05 (part)) have been demonstrated to be available now. The choice of the sites as a suitable location is highly debateable as the proposed development would make the village 'lop sided', has transport issues, etc. to be specifically reviewed by the Inspector on 23rd May, 2018. The fact that the Inspector wishes to review the various issues confirms that whilst the approach taken under the SHLAA is robust per se, as far as Inskip is concerned the approach has not been applied robustly in assessing the suitability of sites in Inskip.

The other 2 sites (INS_06 and INS_07) have been identified but no evidence has been produced in ED089 – SHLAA to advise why these sites should not be considered. The fact that there are issues with the sites is not demonstrated in ED089 to be insurmountable and the fact that these sites are of poorer quality (ACL3) should have made these sites the prime contenders.

INS_06. The flood risk referred to is in respect of a dyke which only affects a small amount of the land and hence the site must be considered as viable. As per ED089

Appendix 8-10 (page 40), this site is 'Let on an Agricultural Tenancy and as such availability is subject to the terms of that tenancy'. As no further details are mentioned, one must assume it is available.

INS_07 has a lower capacity due to the Ethylene pipeline. Without proper consultation in accordance with the Health and Safety Executive (HSE) requirements which only restricts developments with 125 metres of the pipeline it is difficult to understand Wyre's comment (ED12A) "place a significant uncertainty on developability and deliverability". A full evaluation must be conducted in order to prove/disprove this statement. In addition, 'Parts of the northern fringes are within flood zone 2 and 3' are a minor irrelevance. Hence the site must be considered as viable. The land is owned by the same landowner as INS_02 and INS-05. As per ED089 Appendix 8-10 (page 40), this site is 'Let on an Agricultural Tenancy and as such availability is subject to the terms of that tenancy'. This is not insurmountable as the Landowner is already prepared to release some of the INS-05 for use. As no further details are mentioned, one must assume it is available.

INS_05. 'Consideration has been given to the allocation of the whole of INS_05, however this is the site of an operational farm and its allocation is not supported by the landowner.'

This is difficult to assess as there are no minutes taken of the 9 meetings between Wyre and the Landowner, ~~Metaere~~, as confirmed by Wyre (Appendix 1) and the Parish Council were of the opinion that INS_05 was the agreed site until April 2017 (see Wyre Borough Minutes), very late in the Draft Planning process when ~~Metaere~~ 'apparently' withdrew the site.

Wyre appears to have gone for the easy 'numbers' game in selecting site INS_02, this being effectively the only 'offering' from the landowner.

Also Wyre has not demonstrated that it has used all the inferior land (brownfield, ACL 4, ACL 3) land in Wyre before opting for the better land (ACL 2) in site INS_02 as their preferred choice. Nothing in the SHLAA makes it obligatory for sites to be at a certain location and the plan covers all Wyre, not just Inskip. Amongst alternative sites would be:

ED089 Appendix 4 – Sites under Construction

SHLAA Ref	HLM Ref	Site Name	Location	Size (ha)	Cap	Available	Land Type	Notes
FWD_31	0897	Fleetwood Docks	Fleetwood	14.11	336	48	BF	Various Net area excluding access road = 10.40 ha.

The 48 dwellings listed as available do not figure in Appendix 8- 10, despite these dwelling being near infrastructure, facilities and potential jobs. How many other sites of inferior land are not listed which could replace the 200 Inskip quota

In conclusion I contend that the approach for suitability and screening of sites in Inskip within the SHLAA has not been demonstrated to be complete and, as such, is not robust.

2. Inskip Extension (SA1/13)

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

(v) *the loss of the best and most versatile agricultural land;*

Sustainable development is defined: (IISD – International Institute for Sustainable Development)

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

The proposed site (INS_02) is ALC Grade 2 – Very Good Quality Agricultural Land and once built on would never be available for future generations to meet their own needs for agricultural lands. Poorer quality land should be used in preference.

In addition, ED013 National Planning Policy Framework (March 2012) states:

“112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”

1. As stated in ED12a Site Allocations Background Paper - September 2017 (January 2018 Update), INS_02, the land is classed as ALC Grade 2 – Very Good Quality Agricultural Land.
2. The other 3 sites considered in ED12a are:
 - a. INS_05 also ALC Grade 2
 - b. INS_06 ALC Grade 3 (Higham Side Road)
 - c. INS_07 ALC Grade 3 (Dead Dam Bridge)

Hence, in not considering sites INS-06 and INS-07 as the priority, the allocation of INS-07 cannot be considered as sustainable development.

2.1(viii) *flood risk and damage*

In ED089, 2 sites (INS_06 and INS_07) have been identified with negative scores for the water indicator:

INS_06 – The ‘watercourse to the Northern Boundary’ is a negligible amount of land covering a course width of approximately 10m, with the watercourse some 5m below the rest of the site. The rest of the site is up to 15m above sea level and hence with an appropriate surface drainage system has no flood risk.

INS-07 – “Parts of the northern fringes are within flood zone 2 and 3.” Again this is a negligible amount of land, the rest of the site rising to over 10m above sea level and hence again with an appropriate drainage system has no flood risk.

This would indicate that only a paper exercise has been conducted on these sites and no full investigation. The negative water indicator appears to be being used to downgrade these sites to ensure that the impetuous allocation at INS_02 is strengthened.

Also, no allocation has been given to St Michaels Village. STM_03, STM_07 and STM_13 were sieved out due to 'Flood Risk'. This is highly disputable as there has been no unpreventable river flooding in the 32 years [REDACTED]. The flood that occurred in 2016 was due to the river bursting its banks due to lack of maintenance on the banks and is therefore down to Wyre Borough, together with the relevant authority, in again failing to ensure proper maintenance was carried out.

Appendix 1

(https://www.whatdotheyknow.com/request/request_for_meeting_minutes_betw?nocache=incoming-1129476#incoming-1129476)

Re: Freedom of Information Request dated 16th February 2018

Thank you for your email where you requested information about

The information you requested is provided below

Request

I am writing to you to request details of dates, times and recorded minutes of all meetings between Wyre Borough Council and Land development company Metacre Ltd or any agents, consultants or companies employed for the purposes of communicating or developing land or housing development plans on behalf of Metacre Ltd between 2014 and the present day.

Response

The dates and times of the relevant meetings were as follows:

20/01/2014 at 14.00hrs

01/4/2015 at 14:00hrs

24/2/2016 at 14:00hrs

22/11/2016 at 10:00hrs

25/1/2017 at 13:30hrs

25/5/2017 at 14:00hrs

26/10/2017 at 10.00hrs

15/2/2018 at 10:00hrs

12/3/2018 at 10:00hrs

Minutes were not recorded at these meetings

Yours sincerely

Catherine Greener

Legal Executive

For Legal Services