

Wyre Council Local Plan Examination

Matter 8 Representation by E. Deegan Local Plan ID 0987

Matter 8 Allocations - Inskip village

Issue 1 Identification of sites

The inspector poses the question: *Is the approach within the Strategic Housing Land Availability Assessment (SHLAA) to assessing the suitability and screening of sites in Inskip robust?*

Inskip residents expressed their concerns about the Wyre Council approach to assessing the suitability and screening of sites at the 2017 Publication Stage consultation. In short, the process was flawed and decisions made in secret rather than through an open and transparent process. The latter stages of the allocation process which included matters of suitability and screening are inconsistent. Out of 8 sites proposed by the development industry, only 3 were sieved out. It is not at all clear what ranking was given to certain important site planning considerations. One such planning matter is the quality of agricultural land as two Inskip sites were retained at the sieving stage which were grade 2 agricultural land classification. Other inconsistencies arose from addressing flood risk not only within adjacent sites in Inskip, but also between potential allocated sites in Inskip and St Michaels.

The Wyre Local Plan site selection process is described in the Site Allocations Background Paper (September 2017). Whilst the Background Paper does discuss some of the alternative options being considered for Inskip, there is no site selection methodology setting out an evidence based approach as is set out in many other local plans. This needed to include full stages of evidence starting with how much of the need may be accommodated within the existing larger settlements as being sustainable locations of the Borough then further stages of appraisal setting out why some sites were not considered to be appropriate for an allocation. In Inskip for example it is understood that Inskip Parish Council put forward their own suggested site allocations, but even these were not acceptable to the Borough Council. It is not clear how these sites were considered but were not taken forward.

Furthermore, the approach to site selection based on the SHLAA changed between the three options set out in the Issues and Options Paper 2016 and the Publication Draft September 2017. The Publication Draft has been described by the Borough Council as “ a hybrid option based in particular on constraints associated with highways capacity and flood risk” (Submission Draft Wyre Local Plan January 2018 – Statement of Consultation – Appendix 15 and 16). This supports the local view that the Highways authorities and the Environment Agency have exerted undue pressure for financial and other reasons on the proposed land allocations leading to an inconsistent and illogical series of allocations based not on spatial Planning issues and merits rather on some unknown and potentially problematic justifications for those allocations.

From our viewing of the “Wyre Local Plan Issues and Options” in June 2015, three different proposed three spatial distribution options were shown. For each option, the impact on each settlement in the Borough was summarised. Two of the options

had a category of limited development at Inskip while the third option was the dispersal one. At that time, the Inskip impact was described as moderate meaning a moderate amount of development. What was proposed in 2017 and now confirmed is the total opposite of that and without any form of local consultation or even knowledge until Spring 2017. This is not how Government sets out how Local Plans should be prepared.

Any viewing of the proposed housing allocation in proportion to the current size of Inskip would conclude that the relationship is totally disproportionate as we shall now show.

The settlement of Inskip has 236 houses and an estimated a population of 455 as taken from the Wyre Borough Council Settlement Study, August 2016 – Appendix 1. From para 2.3.1 of the Written Statement, it can be seen (as at mid-2016) that the total population of the Borough is 109,749. Inskip is therefore less than a half of one per cent of the Borough population. (around 0.415%). If we now look at the proportion of proposed development between the two, 255 (Inskip) out of 8224 (Wyre) is 3.225%. The proposed allocation is therefore 8 times more than a “fair share” based on existing population of the Borough. A figure of around 30 units would have been a fair share for Inskip of the total Local Plan estimate of need, not 255.

We have also noted that Lancashire County Highways evidence confirmed that the additional 200 for the corridor could be split between Inskip and St Michaels but none are proposed at St Michaels in the Plan. What is the Planning reason for that as none is explained or provided?.

There are other inconsistencies with the “Wyre Local Plan Issues and Options” of June 2015 we have previously drawn attention to. At Para. 6.27 of that document it is stated as follows: “the release of site on the edge of all rural settlements would need to be carefully considered to ensure that the expansion of these settlements is not disproportionate and does not have an unacceptable impact on the character of rural areas”. The proposed expansion of Inskip village to the extent now proposed clearly fails both of those tests.

In terms of site selection following the SHLAA, we also object to the proposed siting of the land allocation at Inskip as it is all within one sector of the village rather than being spread around the village. Such a more dispersed option may have less impact on the character of the village than one large modern housing estate. We have also objected to the loss of good quality agricultural land.

Issue 2 Inskip Extention

Inskip is a quiet and remote settlement whose only real asset is its rural feel, character and setting. It has few amenities beyond a small primary school, a pub and a bowling club. Most residents were either born here or have moved here

because they value and seek the rural way of life in preference to other more urban alternatives. When you speak to others (friends, acquaintances, work colleagues who know the district, across a broad range of ages you find that most people would not choose to live in Inskip because of its remoteness and lack amenities which they perceive as necessary.

The 27 houses under construction at Ash Meadows (south side of Preston Road Inskip) were due to be completed by October 2017 after nearly two year's work. Currently five are occupied with another 10 reserved. Anecdotal evidence suggests that the developer has scaled back construction and houses are only being built to order. The Inskip Extension will be such a hammer blow to the nature of the village that it will destroy the characteristics so many residents moved here for, its rural character, charm and aspect.

The proposal for the Inskip Extension is such a massively disproportionate plan, more than doubling the housing stock of the village core without any clearly identified need. Such a large housing development is in the wrong place and should be close to the jobs that support it. The consequence of this heavyweight treatment is likely to be the loss of the village's rural identity and character to a bland sprawl of housing estate, which cannot be mitigated due to its inordinate size. The plan for the Inskip Extension should be deleted from this Local Plan.

Unsound: The Plan is not positively prepared as the amount of development at Inskip is not in a sustainable location and neither have other options been thoroughly investigated including Elswick in Fylde Borough and to allocate some development to St Michaels. The Plan is not justified as the scale of development proposed at Inskip is massively disproportionate and inequitable and other options are available including more sustainable towns and larger villages. The Plan is not effective as regards the amount and siting of proposals for Inskip. The plan may not be deliverable due to the rural siting and poor sales of recently built new homes. The Plan is not consistent with national policy in particular regarding Core Planning Principles and loss of best and most versatile agricultural land

Proposed modifications: The Submission Draft Wyre Local Plan should be modified to reflect a more moderate scale of extension to the core Inskip settlement as proposed in the earlier "Wyre Local Plan Issues and Options" in June 2015. This would add no more than 50 additional dwellings to the current and approved housing stock. It would reflect a fair share approach to development based on existing populations of the Borough and the Inskip village.

Site Description in Policy SA1/13

Submission Draft text: The allocation consists of three parcels of agricultural land in a flat topography –to the west of the village.

Comment: The proposed site allocation is to the north of Inskip village as well as to

the west. The allocation of three parcels of land either side of Preston Road wraps around the village. The allocations are in two directions not one as is stated.

Key Development Considerations

1 The three parcels should be considered as a single site to be brought forward in line with a masterplan to be produced covering the whole allocation. The masterplan must be agreed by the local planning authority prior to the granting of planning permission for any part of the site. The land directly east of the existing school should only be used for the creation of a village green, whilst the land immediately to the west of the school should only be used for an extension to the primary school.

Comment: The statement contradicts the existing position on site regarding this area. Homes are already being built on part of the site following the grant of planning permission. How can the masterplan be agreed prior to the granting of planning permission as suggested when planning permission has already been granted by the Council. Outline planning permission has already been granted on both sides of Preston Road.

The proposed masterplan will presumably be prepared by agents acting on behalf of the developer. There is no reference to the Planning status of such a document in terms of how binding it would be on the developer and how it would align with other planning documents forming part of the Development Plan.. For example, would the masterplan be part of a new section 106 agreement for the whole site?.

There is no reference to the role of the local community in respect of the masterplan. We would request as a minimum that full local consultation is undertaken prior to the Borough Council approving any such document.

2. The development should be supported by a landscape and green infrastructure framework incorporating structured tree planting, on-site open space, formal and informal play and pedestrian and cycle connectivity within and outside the site.

Comment. Inskip is a rural area and should remain so. To achieve a rural feel to any development, the built development should be subservient to the landscape and green infrastructure which should be the principal characteristic if the development does proceed. The local community continues to object very strongly to the scale of this development, and will continue to do so through the formal process including public examination. We also request a reduction in the size of the allocation, a reduction in the number of housing units and the greening of any development which is confirmed.

3. The design of the development should provide an 'organic' extension to the village. It should utilise important key vistas into the adjoining open countryside and provide a rural transition zone between the development and the wider countryside. Particular attention should be given to the nature and quality of boundary treatments.

Comment: Such is the scale of development being proposed, it is fatuous to suggest this scale could in any way be described as an organic extension of the village. It is rather a massive expansion along two sides of the existing village into open countryside.

4. The site lies in Flood Zone 1. Residual surface water should drain to Inskip Brook.

Comment: There are recent examples of flooding in the Fylde area . Although the Environment Agency may define the site as being in Flood Zone 1 (Low Risk) as set out in the National Planning Policy Guidance, local recent examples of flooding are evidence that this area is incorrectly categorized. Each year flooding occurs in fields and key locations on the local roads. The worst in living memory was at Christmas 2015 so a recent event. Also, Inskip Brook appears locally from the north, around 600m east of the proposed site and loops south of the village towards the west, appearing 300m south of the 27 houses site south of Preston Rd B5269.

From the SHLAA July 2017 report it can also be seen that site INS/03 land at School Lane to the east of the village (p.135 of the SHLAA) was previously sieved out from consideration as an allocation due to flood risk reasons. It can also be seen that in respect of the allocated site INS /02 land to the north of Preston Road, the eastern part of that allocation is immediately adjacent to the sieved out site at INS/02. No explanation or justification appears to be given as to this apparent inconsistency in approach to flood risk as a constraint on allocation of potential development sites. This type of assessment merely reinforces local concern that sites have not been considered on a consistent and evidenced based approach but mainly on the basis of land ownership, which in itself raises issues of probity and the like. This is particularly so on the case of Inskip allocations for which such assessment were undertaken and made in secrecy. .

The potential risk of flooding from such a large development with the amount of hard surfacing to be constructed and creation of major run-off is a major concern for local residents. No reference to many of these matters is made in the policy proposal. It is not sufficient to only rely on the Environment Agency as they cannot have the local daily experience of flood risk to the same extent as the local communities. We have previously requested that the Borough Council commission an independent assessment of flood risk in the Inskip area prior to making any decision about allocating this massive site for development.

5. Inskip Brook is a designated Main River. The prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the watercourse.

Comment: Comments made in respect of the previous item also apply here.

6 A project level Habitat Regulation Assessment (HRA) may be required.

Comment: Local residents are aware that the developers for part of this site with planning permission to the north and south of Preston Road have engaged expert ecological consultants to advise on the nature conservation value of these sites. Whilst it is noted that these reports did not identify any matters of significance for those areas, local residents have noted there are Barn Owls in this locality along with ground nesting birds. Skylarks, Egret and Corncrake have also been seen. Migratory birds using the site include Pink Footed and Greylag Geese, Hooper Swans and Woodcock. We request again that a thorough and independent

ecological appraisal is required at this stage before any decisions are reached as to whether this site should be allocated for housing.

7. The Development should make land available for a new primary school or extension to the existing primary school; this will form part of the financial contribution towards education.

Comment: If this site is to be allocated for housing development, it is important that the existing school facilities are expanded to cater for the additional number of children. Predictions as to future birth rates are notoriously incorrect leading to many school sites being identified but never built. Such an area should be permanently reserved for school use or some other community or open space use. It should not be seen as having potential as the next housing site.

8. The development of the site should include a small convenience store of not more than 400sq.m. gross, and enhanced community facilities if necessary.

Comment: Condition 3 of outline planning permission 16/00481/OUTMAJ dated 1 February 2017 already provides for a convenience store on the north side of Preston Road and within this allocation of for a retail unit not exceeding 500 sq m gross. There is therefore an inconsistency between a planning permission granted in February 2017 and this Local Plan requirement dated September 2017 and confirmed in the submission version of the Plan. .

9. The site does not have any nature conservation designations. Potential ecological impacts should be considered due to the greenfield nature of the site and features such as hedgerows, ponds and the watercourse on the boundary of one of the parcels. Mitigation measures for habitat loss should be met in the local area

Comment: We would refer to comments made in rest of item 6 above.

10. Parts of the site are designated as a Mineral Safeguarding Area.

Comment: A significant amount of the proposed allocation would be contrary to and compromise the mineral safeguarding area set out in the Joint Lancashire Minerals and Waste Local Plan adopted in 2009 (policy M2 refers). There is no evidence setting out how this policy has been assessed in terms of the site. Minerals can only be extracted where they occur, whereas housing can be built in many different areas including all those without safeguarding for minerals.

11. Although the site does not contain known heritage assets it may contain archaeological findings.

Comment: In commenting on planning application 16/00481/OUTMAJ for the site north of Preston Road, Lancashire Archaeological Advisory Service advised that the site was not known to contain heritage assets but is immediately adjacent to known sites including Inskip Pinfold which is shown on 1847 maps. Medieval pottery and prehistoric flint have been found to the west. Inskip is noted in the Domesday Survey

and may be of immediate post-Roman age. They further comment that it is possible that the site may contain buried remains relating to a medieval settlement. It is not considered that remains would be of sufficient significance to require preservation at the expense of development. However, a programme of investigation should be undertaken and a scheme of mitigation recording agreed. This should include geophysical survey and trial excavation and should be secured through condition in accordance with paragraph 141 of the NPPF. Local residents would accordingly repeat our request that these important matters be investigated further before any final decision to allocate the site for housing development .

Unsound: Policy SA1/13 in respect of the Inskip Extension site fails all four tests of soundness as set out in national guidelines. In terms of being positively prepared SA1/13 is not based on the latest OAN for the Wyre Borough as recently published by Government, it fails to take into account infrastructure improvements in towns and larger villages which should be aligned with housing development and could be built and is inconsistent with the principles of sustainable development . The policy is insufficiently justified being based on unknown site selection criteria at both a Borough wide and local level. The policy is ineffective in that growing evidence supports limited demand for housing in Inskip village and the site may take decades to be completed and occupied. Finally, the Inskip site allocation is inconsistent with many principles of the NPPF in terms of the different roles of rural and countryside areas. sustainability, links between infrastructure and development and the lack of public engagement

Proposed modifications: Delete policy SA1/13 Inskip Extension. Set out some specific site selection criteria based on principles of sustainable development, future infrastructure capacity, spatial planning criteria and national guidance and re-assess all sites across the Borough based on latest OAN.