

EiP Statement

Wyre Council Local Plan

Our ref 42026/02/MW/BOC
Date 25 April 2018

Subject Matter 2 – Strategy and Strategic Policies

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [TW] to make representations on its behalf to the Wyre Council Local Plan [WCLP].
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 2 Examination in Public [EiP] hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Legal Compliance, Procedural Requirements and the Duty to Cooperate
 - 2 Matter 3 – Housing and Employment Objectively Assessed Needs (OAN) and Requirements
 - 3 Matter 4 – Housing Land Supply
 - 4 Matter 5 – Specific Housing Needs and Generic Housing Policies
 - 5 Matter 8 – Allocations (Garstang, Bowgreave, Catterall and Barton)
 - 6 Matter 9 – Infrastructure and Delivery
- 1.4 These Matter Papers representations should be read in conjunction with previous submissions on the WCLP [Representor ID 363] as well as those made on other Matters listed above.
- 1.5 TW is seeking to bring forward a high quality sustainable and comprehensively masterplanned residential extension on land West of Cockerham Road [Site ref. SA1/16] and land further to the north and west of the draft allocation. This would assist in the delivery of sustainable development within the borough by making a significant contribution towards meeting the identified needs for market and affordable housing.
- 1.6 This statement expands upon TW's previous representations made throughout the Local Plan preparation process in light of the Inspector's specific issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [Practice Guidance].

2.0 Planning Issues

Issue 1 – The spatial distribution of development

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

2.1 TW supports the identification of a settlement hierarchy and the principles underlying Part 2 of Policy SP1, which states:

“The spatial approach in this Local Plan is one of sustainable extensions to the towns and rural settlements in accordance with the settlement hierarchy below, with settlements higher up the hierarchy, where possible, taking more new development than settlements lower down the hierarchy.”

2.2 However, it considers that the strategy for the distribution of development fails to meet the principles underlying Part 2 of Policy SP1 which seeks to direct development towards those more sustainable settlements within the hierarchy. In this context, TW does not consider the strategy for the distribution of development to be justified.

2.3 Having reviewed the table in Policy SP1, TW notes that the settlements identified as Urban Town and Key Service Centre are only apportioned a combined total of 57.4% of the total housing supply whereas the settlements identified in the Rural Service Centres, Main Rural Settlements and Small Rural Settlements are apportioned the remaining 42.6%. On the premise that Part 2 of the Policy requires development to be apportioned to those more sustainable settlements, it is unclear as to why 42.6% of the borough’s total residential development is being directed to rural settlements which provide access to a limited range of services and facilities and, are considered less sustainable.

2.4 Conversely, the top two-tier settlements are identified in the Settlement Study (August 2016) as the most sustainable settlements in the borough, providing access to a wide range of services and facilities together with education and employment opportunities. These settlements have a better public transport offer and will consequently have a greater propensity for the use of non-car modes of transport. Furthermore, these settlements will most likely have a stronger broadband service benefitting local businesses and allowing people to work from home which in turn will decrease the number of cars on the road at peak travel times.

2.5 It would therefore be prudent to apportion a higher quantum of development / allocate more land within these settlements to maximise the use of the existing service, facilities, employment opportunities and public transport offer. Directing such a significant amount of development towards the rural settlements will not future proof development and will also lead to an over reliance on the use of private vehicles which will have a direct impact on the local highway network.

2.6 In relation to TW’s land interests in Garstang, TW objects to only 9.8% of the borough’s new housing development being apportioned towards Garstang despite the evidence base recognising it as a:

- 1 Sustainable settlement and has the capacity to support a higher quantum of development; and,
- 2 Strong housing market area and a sustainable location for development.

- 2.7 The Council's Settlement Study (August 2016) ranks Garstang as fourth in the 'Overall Settlement Ranking for Wyre'. The Garstang Settlement Profile (October 2016) notes that it is one of the largest settlements in the rural part of the Borough. It has a wide range of services and facilities including:
- Primary and Secondary Schools (Garstang Community Primary School, St Marys & St Michaels Catholic Primary School, Garstang St Thomas Church of England Primary School and Garstang Community Academy;
 - Convenience stores including Aldi, Sainsburys and Booths;
 - Post Office;
 - Health Provision;
 - Garstang Leisure Centre;
 - Leisure provisions including – Garstang Football Club, Hudson Park and Garstang Tennis Club;
 - Employment Provision.
- These sustainability credentials mean that Garstang is a sustainable location for development.
- 2.8 It is therefore unclear as to why only 9.8% of the borough's total housing supply is apportioned towards Garstang. The approach is unjustified and does not reflect the findings of the evidence base. TW requests that there the Council reconsiders its spatial approach towards development and that a higher quantum of development is apportioned to those more sustainable settlements such as Garstang to significantly boost the supply and delivery of housing in sustainable locations in accordance with the requirements of the Framework and, ensure that its role in the settlement hierarchy is properly reflected.
- 2.9 In terms of market signals, the Fylde Coast Strategic Housing Market Assessment [SHMA] (2014) identifies Garstang and Catterall as having the third highest median house price by sub area. Garstang itself is identified as generating higher house prices and operating at the upper end of the market. In this regard, there are clear affordability reasons for increasing the supply of housing in Garstang, not least the provision of affordable housing to meet the needs identified in the SHMA.
- 2.10 Furthermore, these market signals indicate that there is demand within Garstang for additional housing. To meet this demand as well as assisting to resolve the affordability issues in the town, the Council should allocate the remainder of TW's land interest at Cockerham Road for residential development. As demonstrated in Matter 8 and the Development Statement that accompanied the consultation on the WCLP Publication Draft, the allocation of the wider site which TW is promoting would not only assist in the delivery of sustainable development within the Borough, but would also provide economic, social and environmental gains in accordance with the Framework.
- 2.11 The principal reasons for limiting development in Garstang are associated with the perceived highways and flooding issues. As set out in Matter 3, TW disagrees with the Council's evidence based and consider that the highways constraint is overstated and more growth can be accommodated, with appropriate mitigation, in the borough.
- 2.12 There are no insurmountable technical constraints to the delivery of the land TW is promoting. A Traffic and Transport Note that accompanied the submission to the consultation on the WCLP

Publication Draft concludes that there is sufficient capacity within the highways network surrounding Garstang to accommodate a higher quantum of development. In respect of flooding, the Environment Agency identifies the site as being in Flood Zone 1 being at low risk of flooding.

- 2.13 Overall, it is considered that the strategy for the distribution of development in the borough is unjustified as it fails to apportion development towards the identified sustainable settlements identified in the Council's evidence base, nor does it consider the market signals of the area.

Issue 2 – Settlement Hierarchy

Is the position of settlements in the hierarchy within Policy SP1 justified?

- 2.14 TW supports the identification of a hierarchy of Urban Towns, Key Service Centres, Rural Service Centres, Main Rural Settlements and Small Rural Settlements. Given the geography and spread of separate settlements within the Borough, the identification of a sound hierarchy is appropriate for the area and the correct way in which to identify the distribution of future development.
- 2.15 TW also supports the identification of Garstang as a Key Service Centre. As outlined in the preceding sections the Settlement Study (August 2016) ranks Garstang as fourth in the 'Overall Settlement Ranking for Wyre'. The Garstang Settlement Profile (October 2016) notes that it is one of the largest settlements in the rural part of the Borough. It has a wide range of services and facilities, along with a good provision of health and social infrastructure. It's identification as a Key Service Centre is reflective of this. Given the sustainability credentials more growth should be directed here and away from those less sustainable settlements.

Is the amount of development within each level of the hierarchy justified?

- 2.16 Within the representation submitted to the consultation on the WCLP Publication Draft, TW sets out that it does not consider that the amount of development apportioned to settlements and, in particular Garstang is justified.
- 2.17 With reference to the points made in Question 1 of this Matter, TW has concerns that not enough development has been apportioned towards those more sustainable settlements identified within the hierarchy. More development should be directed to these settlements on account of their sustainability credentials, providing access to a wide range of service, employment opportunities and facilities together with education and employment opportunities and, having a greater public transport offer. Directing a greater quantum of development towards these settlements will ensure the effective use of existing services and facilities and will decrease the reliance on private modes of transport, with residents / employees being able to benefit from access to better public transport services.
- 2.18 In relation to Garstang, the Settlement Study (August 2016) ranks it as fourth in the 'Overall Settlement Ranking for Wyre' providing access to a wide range of services and facilities, along with education and employment opportunities. This indicates that Garstang is a sustainable location for new development however, this is not reflected in the WCLP where only 9.8% of the total housing supply has been apportioned Garstang. This is particularly pertinent when the Council is only able to meet 86% of its OAHN.

- 2.19 The Framework¹ is clear that local authorities should use their evidence base to ensure that their Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area. The Council's evidence base suggests an OAHN range for Wyre of between 400dpa and 479dpa over the period from 2011 to 2031. It is noted that the 2016 SHMA² recommends that the OAHN is at the upper end of the range (i.e. 479dpa) to mitigate the risks associated with a declining working age population and support higher levels of affordable housing delivery. Whilst the Council acknowledges that the OAHN for the Borough is 479dpa (9,580 dwellings over the plan period), the Local Plan makes provision for only 411dpa (8,224 dwelling over the plan period).
- 2.20 Drawing these points together, the Council has not sought to provide sufficient land within sustainable settlements to meet the needs of the Borough. TW therefore considers the quantum of development apportioned towards each level of the overall hierarchy to be unjustified. To address this issue, it would prudent for the Council to allocate TW's wider land interest at Cockerham Road for residential development. The site is sustainable, deliverable and could be substantially built out in the first five years following the adoption of the WCLP. Garstang is a sustainable settlement capable of accommodating a higher quantum of development and, that TW's wider land interest has no overriding technical or environmental constraints that would impact on the delivery of development.

Issue 3 – Settlement Boundaries and the Countryside

Are the requirements of Sections 4 and 5 within Policy SP1 too restrictive?

- 2.21 As set out above, the Council is only able to meet 86% of its OAHN requirement. Failure to allocate sufficient land to deliver the OAHN in full is effectively setting up the plan to fail and risks undermining the principles of Part 4 and 5 of Policy SP1 which seeks to restrict inappropriate development outwith of the settlement boundary.
- 2.22 TW therefore requests that the Council extends the settlement boundaries and allocates sufficient land to meet its OAHN in full. In this context, TW wishes to reiterate that its wider land interest at Cockerham Road is well contained by the local highway network and would deliver a logical and sustainable residential extension to Garstang. This wider area of land has the capacity to deliver an additional 150 dwellings and would make a significant contribution towards the borough's housing land supply and would assist in meeting the OAHN in full.
- 2.23 In relation to Part 5 of the Policy, TW objects to the following reference:
- “If developed sites within the open countryside become available for redevelopment, the priority will be to minimise the amount of new development that takes place and the level of activity that a new use generates, while securing a satisfactory outcome.”*
- 2.24 TW does not support this approach towards previously developed sites within the countryside and considers it too restrictive. TW considers it more appropriate to maximise the redevelopment opportunities of previously developed sites within the countryside provided they have no greater impact on the open countryside than that which is existing. This is particularly pertinent when the Council is only able to deliver 86% of its OAHN requirement. It would therefore be logical for the Council to maximise opportunities to redevelop previously developed

¹ National Planning Policy Framework - §47

² 2016 Fylde Coast Strategic Housing Market Assessment: Wyre Addendum 2 [SHMA Addendum 2]

sites on the premise that they will already be connected to existing services and utilities and have a propensity to meet sustainability credentials.

Is Policy SP4 consistent with national policy particularly in respect of protection of the countryside and conversion of buildings?

- 2.25 As set out in the representations submitted to the consultation on the WCLP Publication Draft, TW broadly supports Policy SP4 and considers it to be broadly consistent with national policy in respect of the protection it affords to the countryside areas within the borough.
- 2.26 However, the Council accepts that there is insufficient land within existing settlement boundaries to meet the Borough's housing and employment land requirements. Yet, the boundaries of the Borough's settlements remain tightly drawn, with the majority of land outside them designated as Countryside Areas. TW therefore considers that the Council has failed to recognise that the sustainable development of greenfield land is an important and necessary component of the housing land supply in the Borough.
- 2.27 It is therefore considered that Policy SP4 is not consistent with national policy as it acts as a barrier to boosting significantly the supply of housing³.

³ National Planning Policy Framework - §47