

WYRE LOCAL PLAN EXAMINATION

INSPECTOR'S PRELIMINARY QUESTIONS AND COMMENTS ON ALLOCATIONS

Introduction

1. The purpose of this note is to seek clarification from, and ask questions of, the Council on the allocations and related policies within the Local Plan (LP).
2. These views and questions arise from my initial reading of the Local Plan (LP), some of the key supporting documents and the Summary of Representations.
3. The answers will help me to draw up 'Matters and Issues' for the examination hearings. My questions and comments are without prejudice to consideration of the soundness of the Plan's policies during the remainder of the Examination, including at the hearings. **Some of the answers to the points that I raise may be contained within the evidence base. If that is the case please could my attention be drawn to where I can find the information?**
4. Not all matters raised go to soundness but may assist with the clarity of the LP. Where a point could potentially be addressed by a Main Modification (MM) or Additional Modification (AM) to the LP I will make this clear by including **MM** or **AM** in the text.
5. All references to paragraphs and policies relate to the 'Wyre LP Submission Draft Local Plan January 2018' (SD004).

The Evidence Base Supporting Allocations

6. The Sustainability Appraisal (SA) considers the allocations against SA Objectives and produces a residual score taking into account potential mitigation. The information supporting the objectives is necessarily high level. For example many sites are shown as lying within 500m of a bus stop but with no factoring in of the frequency, timing and reliability of the service. This could be seen as distorting the score for the site.
7. The Settlement Study (ED114) undertakes a more detailed analysis of a number of factors to rank settlements, including services, facilities and transport. But how have the findings of the settlement study and other evidence been considered alongside the SA to inform site allocations?
8. The Strategic Housing Land Availability Assessment (SHLAA) broadly follows the approach advocated by the Planning Practice Guidance (PPG) in assessing suitability, availability and achievability. Appendix 10 to the SHLAA lists the final sites shown by the assessment as being suitable and available assessed as having the capacity of some 7,735 dwellings. The LP provides for less than this number for reasons explained in the LP and elsewhere in the evidence base.
9. In relation to the process of moving from the final sites in the SHLAA to allocations what was the rationale for not allocating any sites in some of the settlements, for example Billsborrow, Knott End/Preesall and Preesall Hill, whereas significant

allocations are proposed in settlements in the same position or lower in the hierarchy? To what extent did the overall settlement ranking in the Settlement Study¹ guide allocations? I note that Knott End/Preesall is ranked 6th and Billsborrow 9th. In this respect I am aware of the explanation in the Site Allocations Background Paper (ED012a).

10. The LP notes that 30% of agricultural land in Wyre is Grade 2 and 43% Grade 3 but only small pockets of Grade 3 have been analysed to ascertain whether they fall within the definition of the 'best and most versatile' agricultural land (para 2.6.11). How has whether land is best and most versatile been considered alongside other factors in deciding whether a site should be allocated? There is reference in the SHLAA to agricultural land factor being a factor in considering suitability and the SA refers to soil and land quality. However, I could not see reference in the Site Assessment Summary Sheets in the SA to agricultural land quality.
11. The evidence base, including the SA and SHLAA, will be discussed during the hearings (Matters 1, 3 and 4 in particular).

General Comments on Allocations Policies

12. There is a significant amount of detail in the allocation policies some of which is not strictly necessary as it is merely making a statement of fact rather than a policy requirement. Such detail would be picked up at application stage and would be subject to generic policies of the LP. If the Council wish to signpost constraints within the specific allocations it would be more concise and clearer to the decision maker to have a criterion within each specific allocation which as an example for SA1/26 would say:
'The following factors/constraints should be taken into account in development of the site: Water Source Protection Zone, two trees on eastern boundary protected by a Tree Preservation Order, the West Coast Main Line'
13. In addition many of the considerations set out in each policy are generic and are repeated in many policies. The LP could be simplified by having a general policy which relates to all allocations and sets out generic requirements (**MM**). Then it would only be those allocations which have requirements which are specific to them that would need a separate list of considerations. For example Policy SA1 would read something like:

The following sites, shown on the Policies Map, are allocated for residential development. Each allocation will be subject to the following considerations in addition to the Key Development Considerations set out for each site:

- 1. Sites with the capacity for 50 dwellings² or more will require a masterplan covering the whole site which should form part of the application for planning permission.*
- 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.*
- 3. For allocations on the edge of settlements the design of the development should*

¹ Appendix 5 of ED114

² Or potentially a higher figure

provide an 'organic' extension to the settlement. 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.

14. There are inconsistencies between allocations. For example some require a Flood Risk Assessment (FRA) e.g. SA1/5 but not others e.g. SA1/2 or SA1/6. In view of the requirements of national policy and Policy CDMP2 does the requirement for a FRA need to be built into the site specific policies? Similar considerations would apply to other requirements for mitigation which would be addressed by other generic policies of the plan e.g. ecological impacts, trees and hedgerows, infrastructure contributions. **(MM)**
15. A number of allocations refer to the provision of a small convenience store (SA1/2, SA1/13, SA1/25, SA3/2, SA3/3, SA3/4, SA3/5, SA4). Assuming Policy EP7 is modified, allocations would also need to reflect a net sales area of 280 sq m **(MM)**.
16. Most of the allocations have a Key Development Consideration relating to 'pedestrian and cycle connectivity within and outside the site'. How feasible is it for off-site connectivity to be improved, particularly in connection with smaller allocations?
17. In relation to habitat loss there is reference to mitigation 'in the local area' for many allocations. In many cases mitigation is only likely to be feasible on site so should the wording be amended to reflect this? **(MM)**
18. In terms of the site capacity and housing delivery sections of each site allocation, these should be updated so that they reflect the position at the proposed base date of 31 March 2018. **(MM)**
19. I have set out below my comments on each site allocation and its Key Development Considerations. I have not indicated whether changes to the policies will be **MMs** or **AMs** as this will be dependent on the extent of changes made in response to my comments.

Housing Allocations

20. The LP makes allocations for 5,375 dwellings of which 5,027 will be delivered in the plan period (see para 9.2.1 of the LP). My understanding is that the allocations are made up as follows:

Source	Plan Period	Total
Housing Allocations	3,337	3,457
Mixed Use	1,440	1,668
Hill House	250	250
Total	5,027	5,375

SA1 – Residential Development

Site SA1/1 – West of Broadway, Fleetwood

21. Key Development Consideration 2. is unnecessary.
22. Potential issues for discussion at the hearings are loss of open space and the sequential and exception tests (Flood Zone 3).

Site SA1/2 – Lambs Road/Raikes Road, Thornton

23. Are there any implications for the development of the site from Key Development Considerations 11 and 13 (telecoms mast)? If there are implications then this should be built into the consideration e.g. 'Development should provide connectivity to the public rights of way to the south on Woodhouse Road and that link Woodhouse Road and Raikes Lane'. If there are no implications then the considerations can be deleted. A similar approach should be taken to the other Key Development Considerations referred to below where the implications for the development are not clear.
24. Potential issues for discussion at the hearings are landscape impacts, access to the site, the highway network and education provision.

Site SA1/3 – Land between Fleetwood Road North and Pheasant Wood, Thornton

25. A potential issue for discussion at the hearings is the highway network.

Site SA1/4 – Bourne Poacher, Thornton

26. Potential issues for discussion at the hearings are the sequential and exception tests (Flood Zone 3).

Site SA1/5 – South East of Poulton-le-Fylde

27. Does the housing delivery section need updating due to the existence of planning permissions?
28. Are there any implications for the development of the site from Key Development Considerations 10 and 13? If none then they can be deleted.
29. Is the provision of a footbridge (Key Development Consideration 11) necessary? Are there any implications for the viability of the development?

Site SA1/6 - Land at Garstang Road, Poulton-le-Fylde

30. Are there any implications for the development of the site from Key Development Considerations 8, 9 and 11? If none then they can be deleted.

Site SA1/7 – Land off Moorland Road, Poulton-le-Fylde

31. Are there any implications for the development of the site from Key Development Consideration 3? If none then it can be deleted.

Site SA1/8 – South of Blackpool Road, Poulton-le-Fylde

32. Are there any implications for the development of the site from Key Development Considerations 10, 11 and 12? If none then they can be deleted.
33. Potential issues for discussion at the hearings are loss of Green Belt land, highway network constraints, site capacity and delivery (nos. that could be delivered in the plan period).

Site SA1/9 – South Stalmine, Stalmine

34. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.
35. Potential issues for discussion at the hearings are highway network constraints, surface water and density/housing mix.

Site SA1/10 – North of Garstang Road, Pilling

36. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.
37. The wording of Key Development Consideration 3 is confusing. It would be sufficient to say in the 2nd sentence that an FRA would be required (although see comments earlier in para 14).

Site SA1/11 – North of Norcross Lane, Norcross

38. The commentary on site delivery indicates that a mixed development is likely to come forward. Should the site be considered as a Mixed Use Development under Policy SA3 rather than under Policy SA1? Has the employment component been taken into account in the employment land figures?
39. Potential issues for discussion at the hearings are highway network constraints, site capacity and delivery.

Site SA1/12 – Land at Arthurs Lane, Hambleton

40. Are there any implications for the development of the site from Key Development Considerations 7-9? If none then they can be deleted.

Site SA1/13 – Inskip Extension

41. Which part of the site has planning permission?
42. Are there any implications for the development of the site from Key Development Considerations 9-11? If none then they can be deleted.
43. Why might a project level Habitat Regulation Assessment be required?
44. Potential main issues for discussion at the relevant hearing are highway network and infrastructure constraints, sustainable modes of travel, the availability of nearby services and employment, landscape impact, scale of development relative to

settlement, loss of agricultural land, flood risk (surface water), the mix of uses and delivery.

Site SA1/14 – North of New Holly Hotel and Bodkin Cottage, Hollins Lane

- 45. Is the whole of the site now a commitment with planning permission?
- 46. Are there any implications for the development of the site from Key Development Consideration 1? If none then it can be deleted.

Site SA1/15 – North East of Hollins Lane, Hollins Lane

- 47. Is the whole of the site now a commitment with planning permission?
- 48. Are there any implications for the development of the site from Key Development Considerations 4 (relating to Flood Zone 1) and 6? If none then they can be deleted.

Site SA1/16 – West of Cockerham Road, Garstang

- 49. Are there any implications for the development of the site from Key Development Considerations 4 (relating to Flood Zone 1) and 5? If none then they can be deleted.
- 50. In relation to Key Development Consideration 2 it is assumed that the A6 Corridor Sustainable Transport Strategy and Initiative 2 would assist in pedestrian and cycle connectivity outside the site.
- 51. Issues for discussion at the hearings are the highway network and site capacity and delivery.

Site SA1/17 – Land south of Prospect Farm, west of the A6, Garstang

- 52. In relation to Key Development Considerations 2 and 7 it is assumed that the A6 Corridor Sustainable Transport Strategy would assist in pedestrian and cycle connectivity outside the site and improving pedestrian/cycle access to Garstang across the A6.
- 53. Issues for discussion at the hearings are the highway network and site capacity and delivery.

Site SA1/18 – South of Kepple Lane, Garstang

- 54. Are there any implications for the development of the site from Key Development Considerations 7 and 12? If none then it can be deleted.
- 55. Should there be a requirement that the existing travelling showpeople yard is relocated to allocation SA6 before development takes place?
- 56. Is there any requirement for expansion of the adjacent primary school onto SA1/18?
- 57. Should the anticipated housing capacity be changed to 125 dwellings to reflect recent commitments?

Site SA1/19 – Bowgreave House Farm, Bowgreave

58. Are there any implications for the development of the site from Key Development Consideration 4? If none then it can be deleted. Key Development Consideration 9 is unnecessary.

Site SA1/20 – Garstang Road, Bowgreave

59. Are there any implications for the development of the site from Key Development Considerations 4 and 6? If none then they can be deleted.

Site SA1/21 – Land south of Calder House Lane, Bowgreave

60. Are there any implications for the development of the site from Key Development Considerations 6, 8, 9 and 11? If none then they can be deleted.

Site SA1/22 – Garstang Country Hotel and Golf Club, Garstang Road, Bowgreave

61. Are there any implications for the development of the site from Key Development Considerations 5, 7 and 10? If none then they can be deleted.

Site SA1/23 – Daniel Fold Farm, Daniel Fold Lane, Catterall

62. Are there any implications for the development of the site from Key Development Considerations 6, 10 and 12? If none then they can be deleted.

Site SA1/24 – Daniel Fold Farm Phase 2, Catterall

63. Are there any implications for the development of the site from Key Development Considerations 5, 7 and 9? If none then they can be deleted.

64. Should the medical centre referred to in the Housing Delivery Section form part of the allocation and should there be a phasing requirement that it comes forward with the housing?

65. I note that there is land sandwiched between SA1/23, SA1/24 and SA2/3 which is not allocated. The SHLAA indicates that the site is 'not available for development.' Are there any particular reasons for this given its location within the settlement boundary?

Site SA1/25 – Land off Garstang Road, Barton

66. Are there any implications for the development of the site from Key Development Considerations 5, 8 and 9? If none then they can be deleted.

Site SA1/26 – Land rear of Shepherds Farm, Barton

67. I note that Shepherds Farm is enveloped by the allocation and lies within the settlement boundary. Whilst noting the 'highway cap' it would seem logical to extend the allocation given that there is a willing landowner.

68. Are there any implications for the development of the site from Key Development Considerations 4, 6 and 7? If none then they can be deleted.

Site SA1/27 – Land rear of 867 Garstang Road, Barton

69. Are there any implications for the development of the site from Key Development Consideration 7? If none then it can be deleted.

Employment Allocations

70. The LP refers to 43 ha of employment land being delivered in the plan period (Policies SP1 and EP1). That said Table 8.2 on page 73 refers to gross provision of some 48 ha. There is an apparent inconsistency in the figures. Moreover, in analysing the various components of employment land supply the following figures arise:

Source of Employment Land Supply	Plan Period (ha)
Employment Development	6.34
Mixed Use Allocations	15.13
Hill House	13.00
Port of Fleetwood	7.0
Completions since 1 April 2011	9.25
Under Construction	4.61
Loss of employment land	2.00
Total (Net)	53.33

71. Please could the differences be explained or the figures corrected to be consistent (**MM?**).

Employment Development

72. There are four employment development allocations under Policy SA2. However, two of these (SA2/1 and SA2/2) relate to small sites with planning permissions in relatively isolated rural locations. In Table 4.1 they are shown as commitments (total of 1.92 ha). Should these sites be treated as commitments or windfalls rather than allocations?

73. The Riverside Industrial Park Extension, Catterall (SA2/3) and land south of Goose Lane (SA2/4) have planning permission or a resolution to grant according to SD007g (page 76) so the Employment Delivery sections should be updated.

74. In terms of SA2/4 what are the implications of 'Key Development Considerations' 2 and 7 for development of the site, if any? Although the application for planning permission offers some support for delivery of the site it has an awkward shape which would limit the extent of developable land and there are contributions/works required for off-site infrastructure. Is the site likely to be viable and deliverable?

Mixed Use Developments

75. The explanation to Policy SA3 refers to the delivery of a mix of uses on these sites (para 9.4.1). Should Policy SA3 or the Key Development Considerations for each site include a requirement for phasing so that there is a link between the provision of housing, employment and other uses?

Site SA3/1 – Fleetwood Dock and Marina

76. Issues for discussion at the relevant hearing for Fleetwood are the highway network; flood risk; the mix of uses; site capacity; and delivery.

Site SA3/2 – Joe Lane, Catterall

77. What are the implications of 'Key Development Considerations' 7 and 10 for development of the site, if any?

78. Issues for discussion at the relevant hearing for Catterall are the mix of uses; site capacity; and delivery.

Site SA3/3 – Land west of Great Eccleston

79. What are the implications of 'Key Development Considerations' 5 (Flood Zone 1), 9 (Grade II listed buildings at Pinfold and St Anne's Church) and 10 for development of the site, if any?

80. Potential issues for discussion at the relevant hearing are highway network and infrastructure constraints, the availability of services and employment, sustainable modes of travel, landscape impact, scale of development relative to the settlement, loss of agricultural land, the setting of listed buildings, flood risk (surface water), the mix of uses and delivery.

Site SA3/4 – Forton Extension

81. Reference should be made to questions in EL1.001a (para 17) in relation to the Strategic Area of Separation.

82. What are the implications of 'Key Development Considerations' 4 (Flood Zone 1), 5, 10, 11, 13 and 14 for development of the site, if any?

83. Is there any particular reason why the established bowling green and playground need to form part of the allocation and could potentially be relocated?

84. Potential issues for discussion at the relevant hearing are the highway network and infrastructure constraints, the availability of services and employment, sustainable modes of travel, landscape impact including on the Strategic Area of Separation, scale of development relative to the settlement, loss of agricultural land, the setting of listed buildings, flood risk (surface water), the mix of uses and delivery.

Site SA3/5 – Land west of the A6, Garstang

85. What are the implications of 'Key Development Considerations' 5 (Flood Zone 1), 6, 10, 11, 12 and 14 for development of the site, if any?

86. In terms of Key Development Consideration 2 has the feasibility of a green link under the A6 been assessed?

Site SA4 - Hillhouse Technology Enterprise Zone, Thornton

87. What is the implication of 'Key Development Consideration' 7 for development of the site, if any?
88. The wording of Key Development Consideration 3 is confusing. It would be sufficient to say in the 3rd sentence that an FRA would be required (although see comments earlier in para 14).
89. Potential issues for discussion at the relevant hearing for Thornton are the highway network; flood risk; the mix of uses; site capacity; and delivery.

Site SA5 - Fleetwood Port

90. What are the implications of 'Key Development Considerations' 1, 6 and 7 for development of the site, if any?
91. Is the Council aware of any funding opportunities which may assist in bringing the site forward in the LP period?
92. Potential issues for discussion at the relevant hearing for Fleetwood are the highway network; flood risk; the mix of uses; site capacity; and delivery.

SA6 - Travelling Showpeople Site – Land at Conway, West of A6, Garstang

93. One site is allocated for travelling showpeople but the GTAA suggested that existing households at the unauthorised site in Garstang were looking for 2 new yards in the local area³. What is the current position?
94. What are the implications of 'Key Development Considerations' 2 (Flood Zone 1), 3 and 4 for development of the site, if any?
95. Key Development Consideration 1 includes a range of requirements which may be desirable but are they all necessary and feasible?
96. The site will be discussed during the hearing session for Matter 5 (Specific Housing Needs and Generic Housing Policies).

Site SA7 - Development Opportunity – Brockholes Industrial Estate, Catterall

97. What are the implications of 'Key Development Considerations' 7, 9, 10 and 13 for development of the site, if any?

Other Minor Comments

98. I have noted a number of further typos and also have some more minor queries. These do not go to soundness but to be helpful I have set these out in the **Appendix**. I do not require any feedback on these comments unless a point needs clarification.

³ ED079 page 19, para 3.45

Response

99. I would like a response by the Council to the above comments and questions by **4 April 2018** or earlier if possible. I am not inviting comments from other parties at this stage. I want to clarify the Council's position first. This will help me to refine Matters and Issues for the hearings and set agendas and questions. All parties with relevant representations will have the opportunity to respond in advance of the hearings should they wish.
100. As referred to earlier if the Council consider that the point or question could be dealt with by a **MM** or **AM** then please confirm. As the examination develops Schedules of MMs and AMs should be produced. The former should be in place in draft form in advance of the hearings, preferably published at the same time as any statements when it will become an examination document and inform discussion at the hearings. It will be refined during and after the hearings. This is on the assumption that the Council wish me to recommend any MMs that are necessary to resolve issues of legal compliance or 'unsoundness'.
101. If you require clarification of any of the above points please contact me via the Programme Officer.

Mark Dakeyne

INSPECTOR

Attached – Appendix

Appendix – Typos and Minor Queries

9. Site Allocations

Para 9.1.2 – 4th line – ‘on the’ repeated.

Site SA1/4 – Bourne Poacher, Thornton - there is a typo in Key Development Consideration 2 (‘in associated’).

SA1/7 – Land off Moorland Road, Poulton-le-Fylde – there is a typo in Key Development Consideration 3 - ‘listed buildings’ (plural)

Site SA1/19 – Bowgreave House Farm, Bowgreave – Key Development Consideration 2 – 1st line – ‘village’ not ‘town’.

Site SA1/21 – Land south of Calder House Lane, Bowgreave – Key Development Consideration 3 – space needed – ‘1, 2 and 3.’

Site SA1/23 – Land at Daniel Fold Farm – stray ‘and’ at end of Housing Delivery Section.

Site SA1/24 – Daniel Fold Farm Phase 2 - Key Development Consideration 6 – missing word ‘side left clear’?

Is the reference to surface water draining south to the River Wyre within the Catterall allocations factually correct given that the river is to the north of the settlement?

Site SA1/27 – Land rear of 867 Garstang Road, Barton - Key Development Consideration 5 – ‘western boundary’ not ‘eastern’.

Site SA3/4 – Forton Extension – site description – are the compass references accurate?

Site SA6 – Site Capacity should refer to ‘plots’ not ‘pitches’.