

WYRE LOCAL PLAN EXAMINATION

STATEMENT BY WYRE BOROUGH COUNCIL ON THE INSPECTOR'S MATTERS, ISSUES AND QUESTIONS

MATTER 8 **Allocations - Fleetwood, Thornton and Norcross**

Issue 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 Fleetwood, Thornton and Norcross robust?***
- 1.1.1 Yes, it is.
- 1.1.2 The approach within the SHLAA to assessing the suitability and screening of sites in Fleetwood, Thornton and Norcross is the same as the approach in relation to all other settlements in Wyre. As summarised in the paragraphs below, the SHLAA provides a robust and detailed analysis of potential land supply for residential development in the various settlements including Fleetwood, Thornton and Norcross. The SHLAA has utilised appropriate data sources and conducted a detailed but proportionate analysis which has produced sound outcomes.
- 1.1.3 The methodology employed in the SHLAA¹ is broadly consistent with national planning practice guidance “Housing and Economic Land Availability Assessment”². Any deviations are explained and justified at page 6 of the SHLAA. Pages five to 15 of the SHLAA describe the study methodology which is based on two main elements:
- a) *Site identification* – sites were identified from a range of sources – the 2010 SHLAA, two call for site exercises held by the Council in 2012 and 2014, the Issues and Options consultation of 2015, and internal survey work.
 - b) *Site assessment* – after an initial assessment of planning status, sites were assessed in three stages – two suitability stages (basic parameters and detailed assessment) and an availability stage. At each stage sites considered not to be suitable took no further part in the process (they were “sieved out”). Availability drew on information from the call for sites exercises and an extensive process of engagement with known landowners. Sites with a planning permission were assumed to be suitable and available.
- 1.1.4 To inform the assessment of site suitability, the Council captured information on a wide range of factors for each site, including policy constraints, ecological and environmental designations, environmental matters such as the presence of contaminated land, agricultural land classification, heritage features, potential land use conflicts and physical constraints. This process was informed by the use of GIS-mapping, site visits and consultation with internal technical officers.

¹ Submission Document Library Reference ED089

² Submission Document Library Reference ED014

1.1.5 Sites “sieved out” of the 2010 SHLAA were reassessed as part of the process.

1.1.6 The SHLAA (pages 15 – 18) describes the assessment outcomes. It shows that 344 sites were identified through the initial assessment. Of these, 11 were completed housing developments and 168 sites were deemed to be unsuitable for residential development. A further 21 sites were considered to be suitable but availability could not be confirmed. Overall, including sites under construction and with a planning permission, the assessment identifies a suitable and available supply of 144 sites with an estimated capacity of 10,751 dwellings. As noted at page 17 of the assessment, the vast majority of this supply lies outside of settlements in areas of countryside. The SHLAA does not use a countryside designation as a reason for sieving out sites – the designation of countryside being a matter for the emerging Local Plan. It is also explained at page 17 that the SHLAA does not have regard to the Local Plan evidence on highway matters³.

1.1.7 The SHLAA identifies a total of 55 sites across Fleetwood, Thornton and Cleveleys (Norcross is part of Cleveleys for the purposes of the SHLAA) as summarised below (excluding two completed sites at the time of the assessment):

	Category	Sites
1	Under construction*	8
2	Planning permission**	5
3	Not suitable (basic parameters)	25
4	Not suitable (detailed assessment)	5
5	Not available	1
6	Suitable and available	9
	TOTAL	53
7	All final sites (sum of 1, 2 and 6)	22

* Includes technical starts. ** includes sites where planning permission is pending the signing of a legal agreement (aka. Mind to Approve)

Issue 2 – West of Broadway, Fleetwood (SA1/1)

2.1 *Is the Council satisfied that flood risk issues can be mitigated such that the site can be delivered?*

2.1.1 Yes, it is.

2.1.2 SA1/1 lies within Flood Zone 3. The Council has undertaken a detailed and site specific assessment of flood risk across the borough through a Level 2 Strategic Flood Risk Assessment⁴, including a detailed assessment of potential development sites⁵. The allocation of the site is also supported by a Level 2 SFRA Flood Risk Sequential Test Paper⁶, prepared by the Council in consultation with the Environment Agency. It provides a detailed assessment of the flood risk associated with proposed site allocations and suggests mitigation measures that are required to make the site acceptable in planning terms. Pages 14 to 17 address flood risk

³ Submission Document Library Reference ED094a

⁴ Submission Document Library Reference ED111a

⁵ Submission Document Library Reference ED112

⁶ Submission Document Library Reference ED113

associated with site SA1/1. The suggested mitigation measures by reference to finished floor levels are reflected in the Key Development Considerations.

2.1.3 Mitigation measures have been assessed through the Local Plan and Site Allocations Viability Study⁷. The viability assessment of the Local Plan by its very nature is high level and the assessment indicates that site viability is marginal⁸. More detailed viability work would be undertaken by the landowner in drawing up the development scheme. It is noted that emerging Local Plan Policy SP6 Viability provides for flexibility on the applicability of all standards applicable to a site where there is a need to consider the financial viability of a proposed development.

2.2 ***Are all the Key Development Considerations necessary and clear to the decision maker?***

2.2.1 Yes, they are.

2.2.2 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the details of a planning application. They provide a useful reference for developers and the local community.

2.2.3 The Council has responded to the Inspector's preliminary questions on allocations⁹ in relation to the key development considerations associated with SA1/1 and proposed a modification to delete a superfluous KDC.

Issue 3 – Lambs Road/Raikes Road, Thornton (SA1/2)

3.1 ***Is the Council satisfied that landscape, biodiversity, heritage, highway and flood risk impacts can be mitigated so that development of the site would be acceptable?***

3.1.1 Yes, it is.

3.1.2 It should be noted that part of the site (some 5.80 hectares) has planning permission for 157 dwellings.

Landscape

3.1.3 The site lies in an area of open countryside on the eastern edge of Thornton. It is not subject to any formal landscape designations. However, the edge-of-settlement location of the site is recognised in the Key Development Considerations which requires the development to be supported by a landscape and green infrastructure framework within the context of providing a rural transition zone between the urban area and the adjacent countryside and coast.

3.1.4 This will be achieved through the required master plan and the application of policies in the Local Plan, in particular CDMP3 Design and CDMP4 Environmental Assets (which includes specific reference to landscape).

⁷ Submission Document Library Reference ED003

⁸ Submission Document Library Reference ED003, paragraph 7.11, page 100

⁹ Examination Document Library Reference EL1.002b, paragraph 21

Biodiversity

- 3.1.5 Advice obtained from Greater Manchester Ecology Unit in preparing the Local Plan¹⁰ identifies the potential to support bird populations due to the site's close proximity to the Wyre Estuary. This matter has been further explored through the Local Plan Habitat Regulation Assessment¹¹ that concluded that the site will have no likely significant effects alone. In-combination, mitigation is proposed for site allocation SA1/2 to require provision of home owner packs. This is due to the sites location within 3.5km of Morecambe Bay European Site and potential in-combination effects from potential increased recreational pressures. The Local Plan HRA conclusion has been agreed with Natural England and this mitigation is identified in the KDCs.

Flood risk

- 3.1.6 The extent of Flood Zone 3 is restricted to the far north eastern corner of the site and is so minimal that for the purposes of the Level 2 Strategic Flood Risk Assessment Sequential Test Paper¹² the site has been treated as being wholly located in Flood Zone 1 (page 6). Site specific flood risk has been considered in detail in the Level 2 Strategic Flood Risk Assessment Addendum¹³. Recommended action which focuses on addressing surface water flood risk, has been taken account via the Key Development Considerations. Any development will further be subject to Policy CDMP2 Flood Risk and Surface Water Management.

Heritage

- 3.1.7 A grade II listed building – Raikes Farm House – is situated in a peripheral location on the west side of Raikes Road, to the north east of the site. Any associated heritage issues are covered by the relevant Key Development Consideration. Any development will also be subject to Policy CDMP5 Historic Environment.

3.2 Is the requirement for a new road from Skippool Road justified?

- 3.2.1 Yes, it is.
- 3.2.2 The requirement for a new road to access the site originates in the highway evidence produced by Lancashire County Council (ED094a) which, at page 66 recommends new highway infrastructure to overcome existing constraints on Skippool Road, in particular Thornton Hall bend to the south of the allocation.
- 3.2.3 The Council has considered this recommendation and acted accordingly to highlight this matter as Key Development Consideration which states that “Primary access into the site should be from a new road from Skippool Road to Raikes Road”. A proposed modification to the relevant KDC, aims to clarify the position that access

¹⁰ Submission Document Library Reference ED100, page 64-64.

¹¹ Submission Document Library Reference SD006

¹² Submission Document Library Reference ED113

¹³ Submission Document Library Reference ED112: site reference's SFRA_18_02, SFRA_18_03A34 and SFRA_18_03, pages 70-75

from the existing road network would be acceptable if demonstrated that this is satisfactory. Owners of land between Skippool Road and Raikes Road have been contacted by the Council to ascertain whether or not they would support the construction of a new road to deliver the allocation. The Council has received support in principle from the relevant landowners.

3.3 Is the requirement for land for a new primary school justified?

3.3.1 Yes, it is.

3.3.2 The Infrastructure Delivery Plan (IDP)¹⁴ prepared in consultation with the Lancashire County Council as the local education authority identifies a need to reserve a site of 2.1ha for additional primary school provision at Thornton (page 54). As noted on page 54 the IDP states that there is no capacity at existing schools in Thornton to absorb the scale of development proposed and furthermore existing schools have no capacity to expand due to playing field protection.

3.4 Should the land to the south of Raikes Road be included within the allocation taking into account constraints to its development?

3.4.1 Yes, it should be.

3.4.2 Land south of Raikes Road was submitted to the Council for consideration through the call for sites exercise in 2014. The allocation is supported by the landowner who also has ownership of land within that part of the allocation north of Raikes Road. The land provides an option for the development of an access road (if necessary) between Skippool Road to the south and Raikes Road, as required by Policy SA1/2. The Site Allocations Background Paper (ED012a) recognises this parcel of land as distinct from the main body of SA1/2. At page's 94 to 95 under site reference THN_45, the document notes the proximity to ecological designations centred on the Wyre Estuary and identifies four constraints and other matters of relevance to the development of the site. The Council are of the opinion that the principle of development is sound and that there are no insurmountable constraints to an appropriate development.

3.5 What is the up to date position in relation to applications/permissions affecting the site?

3.5.1 The planning application/permission position is as follows as of 31st March 2018 (see plan at Appendix A).

- Parcel A – reserved matters permission granted on 7 September 2017 to Wainhomes for 157 dwellings on some 5.80 hectares, planning application reference 17/00050 (based on an outline permission for up to 160 dwellings – application reference 14/00553).
- Parcel B - outline planning application submitted on behalf of Wainhomes for 66 dwellings on some 2.60 hectares, planning application reference 17/00951. Status – under consideration.
- Parcel C – remainder of the allocation. No permissions or applications.

¹⁴ Submission Document Library Reference ED004

3.6 Are all the Key Development Considerations necessary and clear to the decision maker?

- 3.6.1 Yes, they are.
- 3.6.2 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.
- 3.6.3 The Council has responded to the Inspector's preliminary question¹⁵ in relation to the key development considerations and proposed modifications to improve the format of the policies.

Issue 4 – Fleetwood Docks and Marina (SA3/1)

4.1 Is the Council satisfied that flood risk and biodiversity issues can be mitigated such that the site can be delivered and development would be acceptable?

- 4.1.1 Yes it is.

Flood Risk

- 4.1.2 The Key Development Considerations (KDC) identify the allocation SA3/1 as lying in Flood Zone 2 and 3. The Council has undertaken a detailed and site specific assessment of flood risk across the borough through a Level 2 Strategic Flood Risk Assessment¹⁶ including a detailed assessment of potential development sites¹⁷. The allocation is supported by a Level 2 SFRA Flood Risk Sequential Test Paper¹⁸ which has been prepared by the Council in consultation with the Environment Agency. It provides a detailed assessment of the flood risk associated with proposed site allocations and suggest appropriate mitigation measures that are required to make the site acceptable in planning terms. Pages 28 to 31 address flood risk associated with site SA3/1 and suggest appropriate mitigation measures by reference to finished floor levels. This is reflected in the KDCs.

Biodiversity

- 4.1.3 The KDCs identifies the allocation SA3/1 lying adjacent to Wyre Estuary/ Morecambe Bay which is a designated Special Protection Area (SPA), Ramsar Site and Special Scientific Interest (SSSI) and that part of the southern eastern site is a Biological Heritage Site. The Local Plan Habitat Regulation Assessment¹⁹ identifies that a project level Habitat Regulation Assessment (HRA) is required for allocation SA3/1 due to potential increased recreational pressure and disturbance to species as a result of constructional activities/operational stage that could affect a European

¹⁵ Examination Document Library Reference EL1.002b, paragraph 42

¹⁶ Submission Document Library Reference ED111a

¹⁷ Submission Document Library Reference ED112

¹⁸ Submission Document Library Reference ED113

¹⁹ Submission Document Library Reference SD006

sites. The potential mitigation measures that could be relevant to the future development of SA3/1 are identified in the Local Plan HRA²⁰. The Local Plan HRA conclusion has been agreed with Natural England and the KDCs refer to the requirement for a project level HRA. Advice has also been taken from the Greater Manchester Ecology Unit in preparing the Plan²¹ and the KDCs for allocation SA3/1 require the development to consider ecological impact and be mitigated. Policy CDMP4 Environmental Assets parts 10-13 (habitats, species and ecological networks) will also apply to the consideration of any future development proposals

- 4.1.4 Flood risk mitigation and a requirement to undertake a project level HRA have been considered through the Local Plan and Site Allocations Viability Study²². The mitigation measures resulting from the project level HRA if required are unknown and have not been considered in the Viability Study. The Viability Study considered one option based on 120 dwellings together with serviced employment land and land for leisure uses. This particular assessment indicated that the site is marginal in viability²³. More detailed viability work would be undertaken by the landowner in drawing up the development scheme. This would allow further financial modelling to take place establishing the impact of differing amount of commercial and employment uses permitted under the policy to arrive at the most viable position in terms of land use. It is noted that emerging Local Plan Policy SP6 Viability provides for flexibility on the applicability of all standards relevant to a site where there is a need to consider the financial viability of a proposed development.
- 4.1.5 To date, the primary landowner Associated British Ports have not indicated that the allocation and the policy requirements are unviable.

4.2 *Is the mix of uses and extent of the allocation appropriate?*

- 4.2.1 Yes it is.
- 4.2.2 The site allocation SA3/1 is for mixed use development that requires the delivery of 120 dwellings and 7.5 hectares of employment. A proposed modification to the policy clarifies that the proposed use on the site includes housing, non-retail commercial, leisure, tourism and employment.
- 4.2.3 The employment allocation is 7.5 hectares but the policy requires that it should deliver new accommodation for the existing fish and seafood industries at the Dock to secure the long term viability of fish and seafood processing on the wider site. The net employment allocation is therefore around 3.2 hectares. In addition, the allocations proposes 120 dwellings. This is in addition to the existing residential development of 336 dwellings²⁴ located on Windward Avenue which was part of the former Docks and Marina that has been regenerated²⁵.
- 4.2.4 The Council considers the proposed mix on SA3/1 to be appropriate and sufficiently flexible. This also reflects the mix of uses set in the Area Action Plan²⁶. Retail was

²⁰ Submission Document Library Reference SD006, section 8.3, page 59-63

²¹ Submission Document Library Reference ED100

²² Submission Document Library Reference ED003

²³ Submission Document Library Reference ED003, paragraph 7.11, page 100

²⁴ The residential development of 336 dwellings was complete at 31 March 2018

²⁵ The site was allocated in the 2009 Fleetwood and Thornton Area Action Plan.

²⁶ Examination Document ED121, Fleetwood-Thornton Area Action Plan September 2009.

not included in the AAP and this remains inappropriate due to the health of Fleetwood Town Centre²⁷. Fleetwood includes some of the most deprived areas in the Borough and therefore economic development and job creation along with the provision of new housing is important to the town and regeneration of the Dock and Marina.

- 4.2.5 The extent of the site allocation reflects the existing Dock and Marina area, this includes land that is currently vacant and land that is expected to be redeveloped, along with existing established developments. The site allocation is primarily in the ownership of Associated British Port (ABP), the existing retail development at Freeport Village is held on a long term lease and an existing employment site located adjacent to the A585 is in an alternative ownership. The Council considers the site allocation boundary should not be restricted by landownership. The allocation boundary should be appropriate for the redevelopment of the site to considered existing development schemes and provide opportunities for improved linkages. This also avoids parcels of vacant land being looked at in isolation and provides potential opportunities for appropriate redevelopment. This will require joint working amongst the landowners to secure an effective masterplan for the site. The Council therefore considers that it is inappropriate for land in the ownership of ABP to be considered in isolation.
- 4.2.6 The Council considers the extent of allocation SA3/1 provides sufficient land to deliver the required provision of employment and housing whilst also providing sufficient land for the provision of wider leisure, tourism and non-retail commercial development. As a whole, the proposed mix and extent of the allocation is expected to support the delivery and regeneration of the Dock and Marina as well as supporting the wider regeneration of the town.
- 4.3 *Are all the key development considerations necessary and clear to the decision maker?***
- 4.3.1 Yes they are.
- 4.3.2 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.
- 4.3.3 The Council has responded to the Inspector's preliminary question²⁸ in relation to the key development considerations and proposed modifications to improve the format of the policies.

Issue 5 - Fleetwood Port (SA5)

5.1 *Is the Council satisfied that flood risk and biodiversity issues can be mitigated such that the site can be delivered and development would be acceptable?*

- 5.1.1 Yes it is.

²⁷ See Council response to Matter 6 - question 2.2

²⁸ Examination Document Library Reference EL1.002b, paragraph 42

- 5.1.2 The Key Development Considerations (KDC) identifies the allocation SA5 as lying in Flood Zone 3. The council has undertaken a detailed and site specific assessment of flood risk across the borough through a Level 2 Strategic Flood Risk Assessment²⁹ including a detailed assessment of potential development sites³⁰. The allocation is supported by a Level 2 SFRA Flood Risk Sequential Test Paper³¹ which has been prepared by the Council in consultation with the Environment Agency. It provides a detailed assessment of the flood risk associated with proposed site allocations and suggest appropriate mitigation measures that are required to make the site acceptable in planning terms. Pages 25 to 27 address flood risk associated with site SA5 and suggests mitigation, by reference to finished floor levels. This is reflected in the KDC.
- 5.1.3 The KDCs identifies the allocation SA5 lying adjacent to Wyre Estuary/ Morecambe Bay which is a designated Special Protection Area (SPA), Ramsar Site and Special Scientific Interest (SSSI). The Local Plan Habitat Regulation Assessment³² screened the site out of further assessment as the policy safeguards the site for port-related use³³. The Local Plan HRA conclusion has been agreed with Natural England. Advice has also been taken from the Greater Manchester Ecology Unit in preparing the Plan³⁴. Allocation Policy SA5 requires that the development should consider ecological impact and be mitigated. This requirement is reflected in the KDCs.
- 5.1.4 The Local Plan and Site Allocations Viability Study³⁵ by its very nature is high level and an assessment of the viability of a unique scheme, such as the Port of Fleetwood is not possible due to no comparable related scheme. More detailed viability work would be expected to be undertaken by the landowner in preparing the development scheme. The landowner, Associated British Ports have not indicated the policy to be unviable and have confirmed their commitment and support for the Port of Fleetwood allocation (SD007g, representation number: 0299/P/09/C).

5.2 *Is the mix of uses appropriate?*

- 5.2.1 Yes it is.
- 5.2.2 The site is a designated Port and Policy SA5 seeks to retain the site's Port designation. It is acknowledged that under Policy SA5, employment development within B1, B2 and B8 may come forward where it would benefit from the specific port location, but the prime purpose of Policy SA5 is to bring forward and support port related uses.
- 5.2.3 The landowner, Associated British Ports have confirmed their commitment to the Port of Fleetwood and support the allocation (SD007g, representation number: 0299/P/09/C).

²⁹ Submission Document Library Reference ED111a

³⁰ Submission Document Library Reference ED112

³¹ Submission Document Library Reference ED113

³² Submission Document Library Reference SD006

³³ Submission Document Library Reference SD006, 5.3.7 and table 7, page 21-25

³⁴ Submission Document Library Reference ED100

³⁵ Submission n Document Library Reference ED003

5.3 Are all the key development considerations necessary and clear to the decision maker?

5.3.1 Yes they are.

5.3.2 The Council has responded to the Inspector's preliminary³⁶ in relation to the Key Development Considerations (KDC) and proposed a modification to improve the format of the policy.

5.3.3 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the details of a planning application. They provide a useful reference for developers and the local community.

Issue 6 - Hillhouse Technology Enterprise Zone, Thornton (SA4)

6.1 Is the Council satisfied that flood risk, biodiversity and pollution issues can be mitigated such that the site can be delivered and development would be acceptable?

6.1.1 Yes it is.

6.1.2 The Key Development Considerations (KDCs) identifies the allocation SA4 as lying in Flood Zone 2 and 3. The council has undertaken a detailed and site specific assessment of flood risk across the borough through a Level 2 Strategic Flood Risk Assessment³⁷ including a detailed assessment of potential development sites³⁸. The allocation is supported by a Level 2 SFRA Flood Risk Sequential Test Paper³⁹. This has been prepared by the Council in consultation with the Environment Agency and provides a detailed assessment of the flood risk associated with proposed site allocations and suggests appropriate mitigation measures that are required to make the site acceptable in planning terms. Pages 31 to 35 address flood risk associated with site SA4 and suggest appropriate mitigation by reference to finished floor levels. This is reflected in the KDCs.

6.1.3 The KDC identifies the allocation SA4 lying adjacent to Wyre Estuary/ Morecambe Bay which is a designated Special Protection Area (SPA), Ramsar Site and Special Scientific Interest (SSSI) and that there are nearby Biological Heritage Sites. The Local Plan Habitat Regulation Assessment⁴⁰ identifies that a project level Habitat Regulation Assessment (HRA) is required for allocation SA4 due to potential increased recreational pressure and disturbance to species as a result of constructional activities/operational stage that could affect a European sites. The potential mitigation measures which could be relevant to the future development of SA4 are identified in the Local Plan HRA⁴¹. The Local Plan HRA conclusion has been agreed with Natural England and the KDCs refer to the requirement for a project level HRA. Advice has also been taken from the Greater Manchester

³⁶ Examination Document Library Reference EL1.002b, paragraph 90

³⁷ Submission Document Library Reference ED111a

³⁸ Submission Document Library Reference ED112

³⁹ Submission Document Library Reference ED113

⁴⁰ Submission Document Library Reference SD006

⁴¹ Submission Document Library Reference SD006, section 8.4, page 63-66

Ecology Unit in preparing the Plan⁴². Allocation Policy SA4 requires that the development should consider ecological impact and be mitigated. Policy CDMP4 Environmental Assets parts 10-13 (habitats, species and ecological networks) will also apply to the consideration of any future development proposals.

- 6.1.4 The KDCs identify the potential for ground and water contamination and a desk study is required. This is due to the site being a former chemical production facility. The site is a designated Enterprise Zone and the site will be able to attract monies to address any potential onsite remediation work that is necessary. The provision of residential and commercial development within the development mix can also cross subsidise the development.
- 6.1.5 The Local Plan and Site Allocations Viability Study shows that new housing development in Thornton is viable and able to support affordable housing. This is evidenced by the extent of recent housing delivery⁴³ in the immediate area long Bourne Road. In terms of employment uses the results of the Viability Study show that speculative employment development is not currently viable however new employment development will come forward in Wyre arising from specific circumstances such as owner occupation expansion or business agglomeration reasons. In the case of Hillhouse it provides the opportunity for businesses to locate and expand alongside world-leading chemical and polymer production companies. New employment development has taken place at Hillhouse on this basis⁴⁴ and given the circumstances of the site the Council expect this delivery to continue. Overall delivery will also be supported by the Enterprise Zone status of the site which offers opportunities for both Business Rates Relief (of up to £275,000 over five years) and Enhanced Capital Allowances. In addition the retail element of the policy offers opportunities for further cross subsidy if required.
- 6.1.6 More detailed viability work would need to be undertaken by the landowner in drawing up the development scheme however based on current evidence and delivery to date we have no reason to suspect that the site would not be delivered. It is noted that the emerging Local Plan Policy SP6 Viability provides for flexibility on the applicability of all relevant standards where there is a need to consider the financial viability of a proposed development.

6.2 ***Would the requirement for a masterplan prejudice delivery of the site?***

- 6.2.1 No it would not.
- 6.2.2 Within the context of meeting development needs, it is important that development takes place in a manner that respects and integrates well with existing settlements and creates high quality environments for future occupiers and current residents. The requirement for a masterplan allows flexibility in determining the distribution of permitted uses across the site.

⁴² Submission Document Library Reference ED100

⁴³ A Planning Application (Reference 10/00215/FULMAJ and the subsequent permissions to vary layout/plot type) at Bourne Road for 288 dwellings including 40 affordable dwellings on a previously development land (13.8% affordable dwellings). The site commenced in 2011 and the whole site is nearly complete.

⁴⁴ A total of 2.44hectares of employment land has been developed within the Enterprise Zone since 2011 (Planning Applications reference 16/00026/FUL, 12/00274/FULMAJ and 11/0022/FULMAJ)

- 6.2.3 The process for requiring the preparation of a masterplan is set out in the Local Plan (SD004) paragraph 9.1.5-9.1.6. For SA4, it is also important to ensure the required housing and employment development is brought forward in a comprehensive and coherent manner. Bringing the site forward within the context of an overall masterplan will avoid piecemeal development which could undermine the successful delivery of the whole site and prejudice the delivery of key infrastructure, including social infrastructure and highway works.
- 6.2.4 The preparation of a master plan requires all landowners to work together and involve stakeholders. Although masterplans will be prepared by developers/landowners, the Council expects to have a role in facilitating the process and providing a steer. The Council will proactively work with landowners to bring forward the required master plans. A masterplan will assist in the smooth progression of subsequent planning applications. Masterplanning is therefore considered to provide beneficial outcomes for the development of a site and the development management process.
- 6.2.5 To this end a masterplan covering the whole site allocation SA4 is currently being prepared. The masterplan is expected to undergo public consultation and be approved by the Council during summer 2018.
- 6.3 *Are all the Key Development Considerations necessary and clear to the decision maker?***
- 6.3.1 Yes they are.
- 6.3.2 The Council has responded to the Inspector's preliminary question⁴⁵ in relation to the key development considerations and proposed modifications to improve the format of the policies.
- 6.3.3 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.

Issue 7 – North of Norcross Lane, Norcross (SA1/11)

7.1 *Are the extent of the allocation and its capacity appropriate?*

- 7.1.1 Yes it is.
- 7.1.2 The site allocation boundary partially reflect the extant outline planning permission (13/00200) that was approved for residential, 2.79ha of B1 use class and retail development. The Site Allocation Background Paper⁴⁶ provides further information on the extent of the allocation and how the allocation boundary has evolved following the outline planning approval.

⁴⁵ Examination Document Library Reference EL1.002b, paragraph 42

⁴⁶ Submission Document Library Reference ED012a, page 84

- 7.1.3 The extent of the allocation differs to the outline planning permission in two respects: it now includes Clarke House; and it excludes the 0.73ha parcel of land located within the Green Belt.
- 7.1.4 Clarke House was an existing operational employment site at the time the outline permission was approved and was excluded from the application. As a result of evidence of a reduced need for employment land in the borough and Clarke House becoming available following the previous business vacating the site, Clarke House is now included within the allocation boundary. This parcel is located centrally within the site, it is previously developed and appropriate for residential development.
- 7.1.5 The outline permission included 0.73ha of land located within the Green Belt that the indicative masterplan identified to be the location for the Sheltered Housing development⁴⁷. This land is previously developed. The land has been considered within the Green Belt Study (Parcel 11)⁴⁸ and recommends that Parcel 11 be retained as Green Belt⁴⁹.
- 7.1.6 The indicative masterplan for the outline permission identified the retail development to cover the southern parcel of the allocation (2.9ha) that fronts onto Norcross Lane. This area within the site is now covered by a full retail planning permission (17/00122 – approved December 2017) that broadly covers the same area identified for retail development on the outline indicative masterplan. This site has now been sold by the landowner to a developer and hence the value of the retail planning consent has been realised. At 31 March 2018, both permission are extant and neither have been implemented.
- 7.1.7 The site allocation SA1/11 includes land with a full retail permission. As such, the Council considers that it is appropriate for the allocation to be considered as a whole in viability terms with the retail development contributing to the overall viability of the development site. The retail development is in an out of centre location. It would be inappropriate for the Local Plan to make an out of centre retail allocation. The Council considered the extent of the site allocation to be appropriate.
- 7.1.8 In relation to the site's capacity, the starting point is the outline planning permission which has approval for residential development - the indicative masterplan identifies this to be for 220 dwellings (150 dwellings / 70 sheltered housing). The 220 dwellings approved is a housing commitment considered within Lancashire County Council Highway Evidence⁵⁰.
- 7.1.9 The outline planning permission provides public open space within the Green Belt, this increases the developable area within the site allocation. The site allocation boundary now includes Clarke House (2ha) and land previously proposed for employment development (2.79ha) as part of the outline planning permission. This land is now also available for residential development. The site is previously developed and thus residential development should be maximised. In excluding the area of the allocation occupied by the retail permission, around 10ha of land is available for residential development. By applying a higher net developable area

⁴⁷ The indicative masterplan identifies part of the sheltered housing scheme outside the Green Belt.

⁴⁸ The parcel is considered within parcel 11 in the Green Belt Study, ED109

⁴⁹ Also see Councils response to Matter 2, question 5.3

⁵⁰ Submission Document Library Reference ED094a

(80%) and higher density (40dph) compared to the standard assumptions⁵¹, this provides a site capacity for the whole site of 320 dwellings.

7.1.10 The capacity of the site was increased to include a residual 18 dwellings when considering the overall capacity for Thornton⁵² in the highway evidence⁵³ (pages 65-68). It was considered appropriate for the shortfall to be allocated to site allocation SA1/11 to maximise the previously developed site and reduce the extent of the greenfield allocations. The Council considered the capacity of the site allocation to be appropriate and the number deliverable. It should be noted that the landowner in their representation indicate that a higher number can be delivered on the site. The allocation policy does not preclude that subject to highway considerations. The figures in the Local Plan are minimum.

7.2 Are all the Key Development Considerations necessary and clear to the decision maker?

7.2.1 Yes they are.

7.2.2 The Council has responded to the Inspector's preliminary question⁵⁴ in relation to the key development considerations and proposed modifications to improve the format of the policies.

7.2.3 The KDCs as proposed to be modified address relevant matters which must be taken into account in preparing the masterplan and the details of a planning application. They provide a useful reference for developers and the local community.

Issue 8 - Infrastructure

8.1 Will the infrastructure to support the scale of development proposed in the settlements be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

8.1.1 Yes it will be.

8.1.2 The Local Plan is supported by an Infrastructure Delivery Plan (IDP)⁵⁵ that sets out the level of new or improved infrastructure required to deliver the Local Plan. It has been produced through a proactive and on-going process of engagement with all infrastructure providers, including those involved in delivering health, education, utility and highway infrastructure.

8.1.3 Open space is recognised as a part of the borough's infrastructure. The Local Plan, through Policy CDMP4 and HP9, provides the policy basis for the provision of Green Infrastructure, both on and off site as appropriate.

8.1.4 Section 23 of the IDP sets out a schedule of infrastructure requirements, with

⁵¹ Submission Document Library Reference ED089

⁵² Norcross is considered as part of Thornton in the highway evidence ED094a

⁵³ Submission Document Library Reference ED094a

⁵⁴ Examination Document Library Reference EL1.002b, paragraph 42

⁵⁵ Submission Document Library Reference ED004

costings and delivery agencies identified where known. This includes the need for additional primary school places at Thornton as required by SA1/2. The allocation policy requires land to be set-aside within the allocation to facilitate this requirement as an integral part of the proposed development. The council will continue to work with infrastructure providers to ensure that the right infrastructure will be delivered in the right place and at the right time.

Issue 9 – Delivery

9.1 *Are the assumptions about the rate of delivery of houses from the allocations realistic?*

9.1.1 Yes, they are.

9.1.2 The updated housing trajectory in appended to the Council's statement on matter 4, this shows the anticipated delivery rates for each allocation. There is nothing to prevent sites coming forward in a different manner to that set out in the trajectory, for example if a site is selling faster than expected a faster build out rate could be achieved. Equally, there may be a delay in a site commencing if unanticipated issues that require to be addressed emerge in early survey work.

9.1.3 The trajectory is a representation in time of expected delivery using annual monitoring and information received from land owners/agents/developers.⁵⁶ The outcome of the monitoring and contact with owners/agents/developers has informed the application of the standard assumptions on build out rates set out in paragraph 7.27 in the Housing Background Paper. The Council has applied planning judgement on available information as to what is considered an average likely lead in time and build out rates.

⁵⁶ Agents / developers and landowners were contacted in May / June 2017. A similar exercise has not been possible in 2018.

APPENDIX A

SA1/2 - Lambs Road/Raikes Road, Thornton – Current Planning Position

Parcel A – reserved matters permission granted on 7 September 2017 to Wainhomes for 157 dwellings on some 5.80 hectares, planning application reference 17/00050 (based on an outline permission for up to 160 dwellings – application reference 14/00553).

Parcel B - outline planning application submitted on behalf of Wainhomes for 66 dwellings on some 2.60 hectares, planning application reference 17/00951. Status – under consideration.

Parcel C – remainder of the allocation. No permissions or applications.

