Wyre Local Plan Examination – Matters, Issues and Questions

Response Statement

Hollins Strategic Land
April 2018
1 Introduction

1.1 This Response Statement (RS) relates to the Inspector’s Matters, Issues and Questions (MIQ) for the Hearing Sessions. It is demonstrated that significant changes are required in order for the Plan to be found sound, to represent positive planning and result in sustainable development.
2 Matter 2 – Strategy and Strategic Policies

Issue 2 – Settlement Hierarchy

2.1 HSL would like to respond to Question 2.4.

Question 2.4 – Is there sufficient alignment between housing and employment at different levels of the hierarchy?

2.2 It is acknowledged that the points raised here may be for discussion during Matter 8. However, it is considered important to note that whilst policy SP1 states that the Main Rural Settlements will provide 1,684 houses and 1.7ha of employment land, policy SA3/4 states that Forton will provide up to 468 of the houses (28%) and 1ha of employment land (59%). It is considered that the alignment between housing and employment in Forton is not sufficiently proportionate, with 59% of the employment against only 28% of the housing.

2.3 Policy SA1 confirms that Other Main Rural Settlements are due to accommodate significant housing growth:

- Pilling 40 houses
- Barton 132 houses
- Bowgreave 219 houses
- Inskip 255 houses
- Stalmine 162 houses

2.4 However, none will accommodate as much employment land as Forton. This is despite Forton having good access to employment in Garstang (existing and proposed), Lancaster and Preston via good public transport connections along the A6.

2.5 It is also understood that the LPA has based the 1ha requirement of policy SA3/4 on a planning judgement as to what may be appropriate for Forton. However, the LPA cannot provide guidance or evidence to demonstrate what type of employment would be appropriate in Forton and would rather the landowners of the Forton Extension undertake the necessary work.

2.6 It is considered that the case at Forton demonstrates that further evidence is required to justify the proposed alignment between housing and employment.
Issue 4 – Strategic Areas of Separation

2.7 HSL would like to respond to Question 4.4.

Question 4.4 – Is the Strategic Area of Separation between Forton and Hollins Lane justified assuming that the Forton extension (SA3/4) is retained within the LP in its current form?

2.8 It is considered necessary to prevent the merging of Forton and Hollins Lane. Whilst it is understood that some local residents view Forton and Hollins Lane as one wider community, they clearly form two distinct settlements on the ground and are treated as such in the Local Plan. The A6 acts to physically separate the settlements, together with the presence of fields on either side. At present, there is no point between School Lane to the north and Hollins Lane/Ratcliffe Wharf Lane to the south where development is found on opposite sides of the A6, merging the two settlements.

2.9 However, should Parcels E and/or F be developed for housing/employment as part of the Forton Extension, there is a risk that the two settlements will visually merge along the A6 given the approval granted for site SA1/14 in Hollins Lane.
2.10 There would then be a credible argument that the proposed Area of Separation would not be justified; the two settlements will have already merged.

2.11 HSL considers that the LP can achieve the required development in Forton whilst also maintaining separation between Forton and Hollins Lane. It would be necessary to amend SA3/4 so that land north of Forton is allocated rather than Parcels E/F.
3 Matter 3 – Housing and Employment Objectively Assessed Needs (OAN)

3.1 HSL would like to make a general point regarding the overall housing requirement and the unmet need. Wyre has identified an OAN of 9580 and states it can only accommodate 8225. It will ask neighbouring authorities for assistance with its unmet need of 1355 but HSL considers that it should ask for assistance for a greater amount of housing so as to provide flexibility in the developable supply. A 20% buffer against the OAN of 9580 is recommended, in addition to the 1355 unmet need.

Issue 4 – The Housing Requirement of 8,225 dwellings

3.2 HSL would like to make a general point regarding the LCC evidence base and its impact on the Wyre eLP and that of Fylde.

3.3 HSL agrees that the Examination must fully consider this Issue. Lancashire County Council (LCC) Highways has imposed a significant constraint on Wyre Council to the effect that it cannot meet its own housing need and will require assistance from neighbouring authorities.

3.4 It is considered that this Issue must be one of the first issues to be considered during the Examination. If there are any doubts over the evidence provided by LCC, there would be significant implications for the eLP.

3.5 Furthermore, the Fylde Borough Council emerging Local Plan is still in the process of examination. If it were possible for the Inspector to assess the LCC evidence early on in the Wyre eLP examination, it would potentially allow the findings to be taken into account by the Fylde eLP Inspector. This could result in the Fylde eLP being amended to accommodate additional housing, rather than this being done via a review of the Fylde eLP. The Housing Market would benefit from such an approach, particularly given both Fylde and Wyre have underdelivered for a number of years.

3.6 HSL cannot provide evidence to the contrary of that provided by LCC\(^1\), but does question the restrictions imposed on the A6 corridor in light of two recent permissions granted at appeal in Preston for a combined total of 227 dwellings (appeals 3179105 and 3179177). Both sites are off the A6 in the village of Broughton, which lies between Barton and the M55. LCC did not contest the appeal on highways grounds. It is not

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\(^1\) It would be a very costly exercise to undertake such work
clear why LCC considered these Preston sites to be acceptable but will not permit any further development along the Wyre section of the A6.

3.7 HSL considers it vital that LCC demonstrates, to the satisfaction of the Inspector, that any housing over and above the maximum figures set out in the eLP and evidence base would result in severe impacts.
4 **Matter 4 – Housing Land Supply**

4.1 HSL would like to reserve the right to provide further responses on housing land supply once the LPAs up to date housing land supply position is provided in advance of the Examination Hearings.

**Issue 1 – Components of Housing Supply**

4.2 HSL would like to respond to Question 1.4.

**Question 1.4 – Should there be a windfall allowance?**

4.3 If the LPA were to make an allowance for windfall development, it is considered that it should be capable of allocating additional land for development. The LPA cites highways constraints as the main reason for not being able to meet its own housing needs. If there is capacity for windfall sites to come forward, it is unclear how this would fit with the LCC evidence base. The allowance would need to be allocated in the LP so that the Council can place less reliance on neighbouring authorities to provide its unmet need.

**Issue 2 – The Housing Trajectory and Housing Implementation Strategy (HIS)**

4.4 HSL would like to respond to Question 2.2.

**Question 2.2 – Is the approach to making up any shortfall in delivery over the LP period justified (Liverpool approach)**

4.5 The Housing Background Paper (HBP) attempts to justify the Liverpool approach by stating that:

A. Wyre has not received the same levels of pressure for new housebuilding in the absence of a 5 year supply, when compared with other authorities;

B. There have been relatively few refusals and only a small number of allowed appeals suggesting there has not been significant market led demand for new housebuilding;

C. Market indicators of land value and rate of development do not suggest significant pent up demand;

D. Setting unrealistically high targets that the industry did not bring forward, when there was no policy constraint to delivery is not considered a sound approach;
E. Due to the lack of a 5 year supply and supportive national policy, there is no reason that sustainable sites could not have been brought forward were there sufficient market demand in locations that could have been supported;

F. The completions in the first few years post adoption will be limited to those sites which currently have permission;

G. Whilst it is possible to achieve a Sedgefield 5 year supply, it is less certain that this could be achieved and if one or two of the sites with permission stalls this could have implications.

Reason A

4.6 The LPA has not provided evidence of this comparison exercise. It is not known which other authorities have received more pressure from developers and it is not possible to compare the circumstances of these authorities against those of Wyre.

Reason B

4.7 This simply suggests that application submissions have represented sustainable development and that the Development Management team and Members have been aware of the lack of a 5-year supply and have worked towards providing housing wherever possible. HSL has achieved three permissions for residential development from the Council in recent years; two of the sites were allocated in the previous Local Plan and one was open countryside. HSL has found the Development Management team to be proactive and positive during the decision-making process.

Reason C

4.8 HSL has successfully sold land with planning permission in Garstang and the site is in the process of being developed. The marketing of two other sites is ongoing and HSL is confident that development partners will be found.

Reason D

4.9 The adopted Local Plan provided a policy constraint. Furthermore, the development industry has been aware of the highways constraints being consistently imposed by LCC. An adopted Local Plan with allocations could result in positive planning that provides better completion rates.

Reason E

4.10 As with reason D, the current development plan and numerous constraints, including highways and flood risk, have prevented much needed development. A plan-based system with sufficient flexibility could provide more housing.
Reason F

4.11 The LPA has the opportunity to allocate deliverable sites. HSL has promoted land off School Lane, Forton as a deliverable site but the eLP does not allow for development to come forward until a masterplan has been adopted. This is unnecessary and the removal of this requirement would assist the LPA in providing much needed housing earlier in the plan period.

Reason G

4.12 If the LPA acknowledges that a Sedgefield approach to achieving a 5-year supply is possible, it should seek to achieve this. The eLP could be amended to allow sites such as land off School Lane in Forton to come forward earlier in the plan period, providing greater flexibility and certainty.

4.13 It is evident that the LPA has not justified the Liverpool approach. The Council states that the Sedgefield approach is achievable; it must be followed, particularly in light of the persistent under-delivery that has occurred in the Borough and Housing Market Area (Fylde has also underdelivered). Wyre must take the opportunity to significantly boost its supply.

Issue 3 – Five Year Housing Land Supply

4.14 HSL would like to respond to Questions 3.1, 3.2, 3.3, 3.4 and 3.5.

Question 3.1 – Should a 5% or 20% buffer be used to calculate the housing land supply position?

4.15 HSL considers that a 20% buffer must be applied given Wyre has persistently under-delivered. Table 12 of the HBP demonstrates that Wyre did not deliver against the adopted target in 2010/11 and has since significantly failed to deliver against the OAN. This represents persistent under-delivery.

4.16 The HBP argues that recent appeal decisions have not sought to apply greater than a 5% buffer. However, upon reading the decisions, it is unclear as to whether the buffer was challenged by the appellants. The appeals were considered in the absence of a 5-year supply and it may not have been deemed necessary to contest the extent of buffer to be applied.
**Question 3.2 – Generally, are the assumptions about the delivery from commitments and allocations realistic?**

4.17 HSL would welcome the opportunity to reconsider delivery rates from commitments once the updated position is published.

4.18 However, in advance of that, HSL can confirm that land south of Holts Lane, Poulton le Fylde has deliverability issues at present. Planning permission has been obtained for up to 130 dwellings but the site is not viable at present, due to adverse ground conditions. HSL intends to submit an application in May 2018 to vary the requirement for affordable housing so that the site can be made viable.

4.19 With regard allocations, it is considered that the eLP should take the opportunity to provide housing in SA3/4 earlier in the plan period by removing the requirement for a Masterplan. This would increase the 5 year supply and aid the achievement of the Sedgefield method.

4.20 It is noted that the HBP states that the Council has sought information from developers but has not always relied upon it. Rather it has applied planning judgement. HSL considers that the Council should confirm where developer information has not been relied upon as this could have significant implications on the deliverable and developable supply.

**Question 3.3 – Are lead in times and build out rates within the Housing Background Paper realistic?**

4.21 The HBP does not provide evidence to justify the build out rates. It is considered that table 14 does set out reasonable rates for sites with 0 – 50 units and 51 – 100 units. However, the Council then assumes that sites of 101 – 250 units will deliver 45 dpa. This may be because the LPA assumes that these sites will be built out by two developers. However, this would not always be the case. For example, HSL expects the land off Holts Lane in Poulton le Fylde to be built out by one developer at a rate of 30 dpa; the site has consent for 130 dwellings.

4.22 It is also noted that the trajectory at Appendix 2 of the HBP does not take full account of the rates in table 14. For example, the trajectory assumes that the Forton Extension will deliver 20 dpa, then 30 dpa and then 40 dpa. There is no explanation for this trajectory. Indeed, HSL considers it possible for development to occur at between 30 and 50 dpa on Parcel A alone, depending on whether it is developed by one or two housebuilders.
4.23 It is considered that the LPA should take full account of developer information wherever possible, particularly with regard to the larger sites.

Question 3.4 – Is the approach to lapse rates realistic (10% for small sites, no lapse rate for larger sites)?

4.24 Table 15 of the HBP does confirm that a percentage of permissions have lapsed every year since 2004/05. It is acknowledged that the lapse rate has been relatively low. However, a lapse rate has existed and it is considered that this should result in a lapse rate being applied to future consents/allocations.
5 Matter 5 – Specific housing needs and generic housing policies

Issue 1 – Housing Mix

5.1 HSL would like to respond to Questions 1.1 and 1.2.

Question 1.1 – Does the requirement for developments to provide for a mix of housing in accordance with the SHMA provide sufficient clarity?

5.2 The SHMA is dated 2014 and has 3 addendums already. It is not clear as to which element sets out the housing mix requirements that developments should accord with. HSL considers that the LP must set out the requirements with more clarity.

5.3 It is also relevant that a number of the allocated sites already have outline permission. These permissions will have been based on the development plan at the time of the submission of the application and consents will not have taken account of this emerging policy. Housing mix requirements could have significant implications on deliverability should the LPA seek to impose them on reserved matters applications.

Question 1.2 – Is the requirement for developments to provide 20% of housing for older people and with restricted mobility justified?

5.4 HSL acknowledges the need for accommodation for the elderly in Wyre and across the North West. Indeed, HSL recently obtained outline permission for up to 24 units for elderly (over 50s) on land south of Kepple Lane, Garstang. However, it is not considered that the 20% requirement has been fully explained. It is considered necessary for the LP to set out exactly what form of accommodation could be deemed as accommodation for older people and people with restricted mobility.

5.5 Additionally, the policy requires such housing to be located in the most accessible of locations for services and facilities. This presumably means that all of the accommodation for the elderly would be closest to the access points to the site. This is not considered necessary provided the housing is located within recommended walking distances of services and facilities.

Issue 4 – Generic Housing Policies

5.6 HSL would like to respond to Question 4.1.
Question 4.1 – Are the requirements of policy HP9 (green infrastructure in new residential developments) deliverable and clear to the decision maker (the Council has indicated that it will be giving further consideration to the wording of the policy)?

5.7 HSL has attempted to calculate the POS requirement for the Forton Extension based on the requirements of policy HP9, but it is not straightforward and required guidance from the LPA. It is considered that the policy could be reworded to make it more user friendly for developers and decision makers.
6 Matter 8 – Allocations, Poulton le Fylde

Issue 2 – South east of Poulton le Fylde SA1/5

6.1 HSL would like to respond to Questions 2.1 and 2.2.

Question 2.1 – What is the up to date position in relation to applications / permissions affecting the site?

6.2 Application 16/01043/OLULMAJ for outline permission for up to 130 dwellings was approved by the Council on 12/04/2017. As stated, HSL has since discovered ground conditions are such that the approved scheme is not viable. A s.73 application will soon be submitted to vary the affordable housing requirement so that the scheme can be made viable.

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

6.3 The outline permissions have been granted and it is no longer necessary for the Key Development Considerations to be imposed by policy SA1/15. Conditions relating to a number of the matters have been imposed on the outline consents and reserved matters applications will need to comply with these conditions.

Issue 5 – Delivery

6.4 HSL would like to respond to Question 5.1.

Question 5.1 – Are the assumptions about the rate of delivery of houses from the allocations realistic?

6.5 The delivery of the land off Holts Lane is dependent upon the outcome of the impending s.73 application.
7 Matter 8 – Allocations, Stalmine

Issue 3 – South Stalmine (SA1/19)

7.1 HSL would like to respond to Questions 3.1 and 3.2.

7.2 Firstly, HSL considers that a more sustainable option is available to the LPA:

This plan shows that the South Stalmine allocation can include land that benefits from permission for 77 dwellings (17/00026/RELMAJ); land that is the subject of an application (no. 18/00075/OUTMAJ) for 65 dwellings; and land which HSL has an interest in and can accommodate c. 40 - 45 dwellings.

7.3 This development option would be better related to the existing settlement than the proposed allocation. Furthermore, HSL anticipates that application 18/00075/OUTMAJ will be approved by the LPA or by the Inspectorate in light of the tilted balance. Once
approved, it would be more logical to develop the land to the immediate south in order to achieve the housing target.

7.5 It is also understood that the land which does not have permission and forms part of the current SA1/19 allocation is in multiple ownerships. This could prevent or delay delivery of much needed housing. The alternative land can come forward quickly and contribute to the five year supply.

Question 3.1 – Can development of the allocation be mitigated so that it would not lead to severe transport/highway and flooding impacts?

7.6 It is understood that there would be no severe highways or adverse flood risk impacts from the development of the aforementioned alternative land.

Question 3.2 – Are all the Key Development Considerations necessary and clear to the decision maker?

7.7 These are not all considered necessary in light of the Reserved Matters approval for the land that forms the north western parcel of the allocation.
8 Matter 8 – Allocations, Forton and Hollins Lane

Introduction

8.1 Policy SA3/4 requires the Forton Extension to provide:

- 468 dwellings, with public open space (POS);
- 1ha of employment land;
- Land for school extension (if required) (1ha estimate); and,
- Neighbourhood centre, comprising:
  - Local convenience store of not more than 500sqm;
  - Community hall; and,
  - Health facility (if required).

8.2 The LPA arranged a Landowners Meeting on 26/02/2018. During that meeting, the LPA confirmed that it:

- would be up to the landowners to work together to produce a Masterplan before any development could be approved;
- would help to facilitate the process, but would not have the resources to manage the Masterplan, undertake the necessary evidence base or produce the Masterplan document;
- is in the process of preparing guidance on how the Masterplan should be prepared but does not have a timetable for its production;
- expects a full suite of scoping reports to influence the masterplan and for landowners to pay for these reports;
- does not have reports that could form part of the suite;
- has an idea of where the various uses could be provided but does not want to influence the landowners masterplanning process;
- thinks one party should take the lead in preparing the masterplan, with all landowners contributing to the cost; and,
- wanted all landowners to meet independently of the LPA to further discuss the Masterplanning process.

8.3 HSL met with the landowners/agents for Parcels B – F during March and April 2018 and then arranged a Landowners meeting for 20/04/18. During that meeting, the aspirations for each Parcel were tabled:

- Parcel A: up to 210 dwellings, neighbourhood centre and significant POS, as well as a link road to the boundary with Parcel B;
• Parcel B: is open to providing the link road from Parcel A to Winder Lane, providing it secures benefits on Parcel D, and would rather accommodate the community centre and satellite surgery with replacement POS on the southern field of Parcel A;

• Parcel C: 25 – 30 dwellings and is willing to provide the link road from Winder Lane to Parcel D;

• Parcel D: is willing to provide the school extension (if required), provided it can also secure residential development, and is open to providing benefits to B in exchange for the link road provision;

• Parcel E: up to 147 dwellings and a shop, as well as c. 1ha of POS;

• Parcel F: is open to employment and/or housing (although this could not be confirmed as the landowners could not attend the meeting).

8.4 It was also confirmed that Parcels A, C and E intend to submit applications shortly. HSL can provide further information regarding the application for Parcel A below. All landowners are conscious that the 468 figure is an absolute maximum due to highways capacity along this section of the A6. There is a risk that other landowners submit applications for residential development outside of the Forton Extension and if these are approved due to the lack of a 5-year supply, the amount of development in the Forton Extension would reduce. There is potentially competition to obtain permission for this reason.

8.5 An application (no. 17/00587/OUTMAJ) for up to 46No. dwellings on land west of the village (adjoining the cricket pitch) is currently pending consideration and is expected to be recommended for approval at Committee in June 2018 # statuary objections #. If this is approved, it must be assumed that the Forton Extension would only provide 422 dwellings.

8.6 Furthermore, the Forton Extension is some 29ha in extent. Even if the LPAs net developable area (NRA) of 60% is applied to this, the Forton Extension could provide 17.4ha of developable land. At 30 dwellings per hectare (dph), which is the density figure applied by the LPA in its evidence base, this could provide 522 dwellings.

8.7 HSL and other landowners have agreed that there is too much land within the Forton Extension for the development that is required by policy SA3/4.
It is evident that policy SA3/4 has allocated c. 9.4 ha more than is needed to comply with the policy requirements (29 ha minus 19.6 ha).

This is causing conflict amongst the group of landowners, who are all understandably competing to achieve residential development on their Parcel. On this basis, HSL considers that the Forton Extension should be reduced to c. 20 ha.

Parcels A, C and D are all well related to the existing settlement and form the most logical and locationally sustainable extensions. Parcels A and C can be developed without the need for a link road through B and so can come forward early in the plan period. Parcel A can secure the Neighbourhood Centre in a central location within the village, adjoining the existing community facilities at Parcel B. The community centre, satellite surgery and convenience store would then all be within easy walking distance for existing residents in Forton. Parcel D could be necessary if school extension land is required.

Parcels E and F are disconnected from the village and, if developed for housing, would effectively form stand-alone satellite estates which would increase the sense of Forton and Hollins Lane merging. However, it is considered that either Parcel E or F would represent a logical location for the 1 ha of employment (if it is retained as a requirement in the LP), particularly given the presence of existing employment uses along this section of the A6, north and south of Parcel E.

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* 468 minus 46
**see appendix 3 for calculation²

² Appendix 3: POS Calculation
8.12 HSL has produced Plan of how the Forton Extension could be achieved in a sustainable manner. This may not be accepted by Parcel E, but HSL considers that it would represent sustainable development. The LPA could amend the Proposals Map so that it reflects this Plan, which also takes account of landowner aspirations.

8.13 Alternatively, should access through to Parcel D be unachievable due to Parcels B and/or C, HSL considers that the land north of Forton should come forward for development in advance of land that is disconnected from the village and could increase the sense of Forton and Hollins Lane merging. The land north of Forton is larger than would be required for the outstanding amount of development, but could accommodate, for example, a football pitch or a second cricket pitch which is desired by local residents. It could simply be safeguarded on the Proposals Map.

**Issue 2 – Forton Extension (SA3/4)**

8.14 HSL would like to respond to Questions 2.1 – 2.5.

**Question 2.1 – Would any of the issues i – xii in isolation or cumulatively lead to a conclusion that the allocations would not comprise sustainable development?**

8.15 It is considered that this Question must be considered in light of the highways constraints imposed on the Council by LCC and the Council’s subsequent inability to achieve its housing requirement. This factor weighs heavily in the planning balance when considering whether the Forton Extension represents sustainable development.

The scale of the allocations relative to the size of the village

8.16 It is acknowledged that the Forton Extension would significantly increase the size of the village in terms of the number of dwellings and its population. However, once the Forton Extension has been constructed, Forton will still be a village in terms of its size and it will still have the character of a village. The Parcels can be developed so that they represent an organic extension to the village, reflecting existing character and providing good permeability.

The effect on the character and appearance of the village and the surrounding countryside, including the gap between Forton and Hollins Lane around Sunny Bank Nurseries

8.17 As previously stated, HSL considers that an organic Forton Extension can be achieved through design and connectivity. Furthermore, HSL considers that whilst Parcels E and

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3 Appendix 1: Forton Extension Allocation Plan
F would be considered as detached from the settlement of Forton in terms of social inclusion and access to facilities, there is also potential for their development to increase the sense of coalescence between Hollins Lane and Forton along the A6 between School Lane to the north and Hollins Lane/Ratcliffe Wharf Lane to the south.

The availability of services and employment within or close to the village, including school places, health services and convenience store

8.18 HSL has confirmed that Parcel A can provide a satellite surgery and convenience store. This can be done relatively early in the delivery of the Forton Extension. The impending application for Parcel A will include a Transport Assessment, which confirms the locational sustainability of the site; this can be provided to the Inspector upon request.

8.19 The Forton Extension landowners have asked the LPA to provide further detail with regard the need for school places. Parcel D is ideally located to accommodate land for a school extension if it is deemed necessary.

Choices of modes of travel to access services and jobs

8.20 The provision of a Neighbourhood Centre in Parcel A will significantly increase the locational sustainability of the village. Furthermore, there are good bus services along the A6 providing frequent links to employment and services in Garstang, Preston and Lancaster. Again, the TA done to support the application for Parcel A can provide further information and HSL can provide this upon request.

The loss of best and most versatile land

8.21 It is understood that Wyre has significant amounts of BMV land across the borough and the Council is reliant upon greenfield settlement extensions to provide housing.

The highway network

8.22 The LCC evidence base demonstrates that the Forton Extension can be accommodated without a severe highways impact. The TA for the Parcel A application demonstrates that the proposals would not have a severe impact. Furthermore, the Parcel A application can provide the link road to Parcel B.

The creation of inclusive and mixed communities

8.23 As stated, Parcels A, C and D are well related to the existing community. They can be developed in a manner that provides interconnectivity between the existing residents and future occupiers of the Forton Extension. The provision of the Neighbourhood Centre and significant POS in Parcel A would also aid the creation of inclusive communities, as it would be within easy walking distance of existing residents and future occupiers.
HSL has confirmed that Parcel A can accommodate affordable housing, bungalows for
the elderly (over 50s) and potentially, apartments over commercial units. The mix of
family housing would also vary across the Parcel.

Flood risk and drainage

A Flood Risk Assessment has been undertaken for Parcel A (available upon request)
and confirms that the proposals would not increase the risk of flooding elsewhere.

Biodiversity impacts

An Ecological Survey and Assessment has been undertaken for the application for
Parcel A and confirms that the development has the potential to achieve a net gain in
biodiversity.

Heritage Assets

The development of Parcel A would not affect the setting of any heritage assets.

Gas main safeguarding

The HSE has not objected to application 17/00587/OUTMAJ and has confirmed that
the pipeline is not a constraint to development in Forton.

Question 2.2 – Do the existing bowling green and playground need to be
included in the allocation and/or relocated?

The Council has included this land so that it can be used to provide the link road through
Parcels A, B and C to Parcel D. Significant residential development on Parcel D could
not be achieved via Winder Lane/School Lane.

It is not considered necessary to relocate the entirety of the existing POS. The southern
part of the POS, which would provide the link road, simply provides amenity
greenspace. The northern part, which provides the bowling green, kick-about football
pitch and play area could be retained even with the provision of the link road. The POS
forms part of the heart of the existing village, and that of the Forton Extension once the
Neighbourhood Centre is provided in Parcel A (north of School Lane).

The Parish Council and Village Hall Committee would like to provide the new
Community Hall on Parcel B, in the northern part of the site. This is yet to be formally
confirmed through a voting process, but it remains an option at this stage. That could
also be accommodated together with the link road. HSL has discussed this possibility
with the Village Hall Committee and Parish Council. Both have indicated that they would welcome the replacement of the land lost to the Community Hall on the southern field of Parcel A. HSL has confirmed that it would be open to this and would consider amending the description of development during the application process should it be formally confirmed.

**Question 2.3 – Are the extent of the allocations and their capacity appropriate?**

8.32 The HSL Plan (see appendix 1) demonstrates the potential capacity of each land Parcel.

8.33 HSL can confirm that Parcel A can accommodate:
- Up to 210 dwellings, including 30% affordable housing, bungalow provision and apartments above commercial uses;
- Neighbourhood centre, comprising Community Hall, Satellite Surgery and Convenience Store;
- 2.75ha of POS which connects with existing PROWs and retains key vistas out of the village to the north and east; and,
- Link road to western boundary of Parcel B.

8.34 The latest version of the Concept Plan for Parcel A is appended\(^4\), to illustrate how all of this could be accommodated in a sustainable manner that is respectful of the requirements of policy SA3/4.

8.35 HSL can also provide the Inspector with the full application submission package upon request.

**Question 2.4 – Would the requirement for a masterplan to be agreed at planning application stage prejudice delivery of the site (or part of it)?**

8.36 As stated, the landowners are potentially under pressure to achieve permission on their parcels due to the maximum housing figure of 468 imposed by LCC, which could be reduced to 422 if permission is granted on land west of Forton.

8.37 In Representations on the Publication Version, HSL set out that it could take a number of years for development to be delivered in Forton if a masterplan is required. Even if

\(^4\) Appendix 2: Concept Plan
all landowners were willing to participate, it would take several months to acquire the scoping reports required by the LPA and to then draw up a masterplan that would satisfy all landowners. The LPA would then have to adopt the masterplan prior to outline and full/reserved matters applications being submitted.

8.38 Parcel A can come forward in advance of the Masterplan. It is the most suitable site in Forton and can deliver sustainable development in a manner that is respectful of the Masterplan.

8.39 Of course, the LPA could simply take account of the landowners aspirations and amend SA3/4 and/or the Proposals Map so that it allocates specific Parcels for specific non-residential uses e.g. Parcel A could be allocated for a Neighbourhood Centre and residential development; Parcel D could be allocated for a school extension and residential development; Parcel F could be allocated for employment land. The LPA has confirmation that each landowner is willing to accommodate these uses.

**Question 2.5 – Are all the Key Development Considerations necessary and clear to the decision maker?**

8.40 KDC 4 states that development should drain to the canal. The FRA that will accompany the application for Parcel A demonstrates that this is not necessary.

8.41 KDC 5 requires land for a school extension but the LPA has not received confirmation from LCC that this is necessary.

8.42 The landowners meetings have confirmed that the LPA should provide guidance on the employment uses that are required. The LPA suggested that it would be for the landowners to demonstrate what type of employment is required but this would require significant work to be undertaken at cost. It is considered that the LPA should undertake this work in order to be able to justify the requirement for 1ha of employment land and to inform a KDC which sets out what form of employment use would be appropriate.

**Issue 4 – Infrastructure**

8.43 HSL would like to respond to Question 4.1.
Question 4.1 – Will the infrastructure to support the scale of development proposed in the settlement be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

8.44 With specific regard to Forton, it is considered that the Local Plan should set out exactly what is required. The landowners need to understand whether a satellite surgery is necessary; whether land for a school extension is required; how a community centre would be funded.

Issue 5 – Delivery

8.45 HSL would like to respond to Question 5.1.

Question 5.1 – Are the assumptions about the rate of delivery of houses from the allocations realistic?

8.46 As stated, HSL considers that the Forton Extension can provide much needed housing earlier in the plan period. The requirement for a Masterplan should be removed in acknowledgement that Parcel A can be developed in a sustainable manner that is respectful of the SA3/4 KDCs.
9 Matter 8 – Allocations, Garstang, Bowgreave, Catterall and Barton

Issue 4 – South of Kepple Lane, Garstang (SA1/18)

9.1 HSL would like to respond to Questions 4.1 and 4.2.

Question 4.1 – Is the extent of the allocation and its capacity appropriate?

9.2 HSL recently obtained outline permission for up to 24 dwellings and up to 26 apartments for the elderly (over 50s) on land at Dunollie Farm (the eastern portion of the allocation). When combined with the outline consent for 75 dwellings on the western portion, the capacity of SA1/18 is 125 dwellings.

9.3 As stated in previous Representations, this increase in capacity at SA1/18 should result in the capacity of sites SA1/16 and/or SA1/17 being reduced as they are in the ‘A6 corridor severe restriction zone’. If the LPA does not do this, it will effectively admit that the LCC Highways evidence-based capacity figures are not maximums. It should then be possible for additional land to be allocated for housing and for Wyre to reduce its reliance on neighbouring authorities.

Question 4.2 – Are all the Key Development Considerations necessary and clear to the decision maker?

9.4 As both portions of the site have planning permission, the KDCs are not considered necessary. As with site SA1/5, conditions have been imposed on outline consents and reserved matters applications will need to comply with those conditions.
10 Matter 9 – Infrastructure and Delivery

Issue 5 – Infrastructure Delivery Plan

10.1 HSL would like to respond to Question 5.1 and 5.2.

Question 5.1 – Is the IDP clear as to what infrastructure projects are critical to the delivery of the LP, when infrastructure will be delivered, sources of funding and who is responsible for delivery?

10.2 It is considered that policy SA3/4 and/or the IDP should give clearer guidance as to what is required for the Forton Extension. It is still not known whether a satellite surgery is required, whether land for a school extension is required, or how the replacement community hall would be funded.
11 Conclusions

11.1 This RS has raised the following key points:

- Further evidence is required to justify the proposed alignment between housing and employment;
- The development of Parcels E and F within the Forton Extension could result in the Area of Separation between Forton and Hollins Lane not being justifiable;
- The LCC Highways evidence must be examined in detail at an early stage of the LP examination because any failings could result in significant implications for the Wyre and Fylde emerging Local Plans in terms of housing provision;
- The Council has not justified the Liverpool approach;
- The Council must take full account of developer information on build out rates wherever possible;
- The KDCs are not necessary for SA1/5 or SA1/19;
- SA1/19 should be amended to include land west of the proposed allocation;
- The Council has allocated too much land for SA3/4 and this is adding to the competition between land owners to achieve development;
- There should be no requirement for a Masterplan for SA3/4 as it will significantly delay the development of sites that can come forward in a sustainable manner and respect the KDCs, such as Parcel A off School Lane;
- The principle of a Forton Extension represents sustainable development;
- The capacity of SA1/18 must be updated and this would subsequently result in the capacity of other sites having to be reduced if LCCs highways evidence is to be relied upon; and,
- The IDP should give clearer guidance on what is required for SA3/4 and how it can be secured.

11.2 HSL would welcome the opportunity to discuss these issues during the Examination, particularly the Forton Extension.
Residential Development    Neighbourhood Centre
Public Open Space      Road Network
Employment Land (1ha)  Pedestrian Links
Land for School Extension  Existing PROW

Land west of Forton - 46 dwellings pending consideration
Site A  210 dwellings and Neighbourhood Centre
Site B  Potential Road Link and Community Hall
Site C  Potential Road Link and 27 dwellings
Site D  150 dwellings and School Extension
Site E  Retained as Gap between Forton and Hollins Lane
Site F  1ha of Employment Land and 35 dwellings

TOTAL = 468 Dwellings

Drawing Ref: 01
Appendix 2
Policy HP 9 – Green Infrastructure (GI) in New Residential Development

<table>
<thead>
<tr>
<th>Typology Provision</th>
<th>Quantity Standard per 1000 population (ha)</th>
<th>Accessibility Standard (metres)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Urban</td>
</tr>
<tr>
<td>Parks, gardens</td>
<td>0.40</td>
<td>720</td>
</tr>
<tr>
<td>Amenity greenspace</td>
<td>0.40</td>
<td>720</td>
</tr>
<tr>
<td>Natural and semi natural greenspace</td>
<td>1.50</td>
<td>2000</td>
</tr>
<tr>
<td>Children and young people play area</td>
<td>0.18</td>
<td>480</td>
</tr>
<tr>
<td>Allotments</td>
<td>0.25</td>
<td>960</td>
</tr>
<tr>
<td>Playing pitches</td>
<td>Provision in line with the match equivalent session demand as set out in the latest Playing Pitch Strategy and action plan.</td>
<td></td>
</tr>
</tbody>
</table>

GI requirement broken down by Typology

The council currently considers the 5 typologies as one, and the total requirement will then be split based on the most appropriate GI for the development in its context.

To calculate the estimated population of the development Wyre Council use average household size by size of property (defined by the number of bedrooms) for Wyre from the 2011 Census, gives:

<table>
<thead>
<tr>
<th>Beds</th>
<th>Household size</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>1.30</td>
</tr>
<tr>
<td>2</td>
<td>1.74</td>
</tr>
<tr>
<td>3</td>
<td>2.42</td>
</tr>
<tr>
<td>4</td>
<td>2.95</td>
</tr>
<tr>
<td>5+</td>
<td>3.35</td>
</tr>
</tbody>
</table>

Wyre council considers a typical housing scheme could have the following profile:

- 10% 2 beds
- 40% 3 beds
- 40% 4 beds
- 10% 5 beds

Forton Extension = 468 dwellings. 46 dwellings are pending consideration on an unallocated site West of Forton, that would count towards this requirement.

Should this be approved it would leave **422 dwellings** to be delivered on the Forton Extension sites.
This would generate the following population based on the above profile:

<table>
<thead>
<tr>
<th>House Size</th>
<th>Dwellings</th>
<th>Population Generation</th>
</tr>
</thead>
<tbody>
<tr>
<td>10% 2 beds</td>
<td>42</td>
<td>73</td>
</tr>
<tr>
<td>40% 3 beds</td>
<td>169</td>
<td>409</td>
</tr>
<tr>
<td>40% 4 beds</td>
<td>169</td>
<td>499</td>
</tr>
<tr>
<td>50% 5 beds</td>
<td>42</td>
<td>141</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>422 dwellings</strong></td>
<td><strong>1122 people</strong></td>
</tr>
</tbody>
</table>

This population generates the following GI requirement:

<table>
<thead>
<tr>
<th>GI Typology</th>
<th>Quantity Standard per 1000 population (ha)</th>
<th>Requirement Generated by remaining Forton Extension</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parks, Gardens</td>
<td>0.4</td>
<td>0.45</td>
</tr>
<tr>
<td>Amenity Greenspace</td>
<td>0.4</td>
<td>0.45</td>
</tr>
<tr>
<td>Natural and Semi Natural Greenspace</td>
<td>1.5</td>
<td>1.68</td>
</tr>
<tr>
<td>Children and Young People Play Area</td>
<td>0.18</td>
<td>0.2</td>
</tr>
<tr>
<td>Allotments</td>
<td>0.25</td>
<td>0.28</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>2.73</strong></td>
<td><strong>3.06</strong></td>
</tr>
</tbody>
</table>