



The Planning Inspectorate

Report to Wyre Borough Council

by Mark Dakeyne BA (Hons) MRTPI
an Inspector appointed by the Secretary of State
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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Wyre Local Plan

The Plan was submitted for examination on 22 January 2018

The examination hearings were held between 15 May and 5 June 2018

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Abbreviations used in this report

AM	Additional Modification
AONB	Area of Outstanding Natural Beauty
CIL	Community Infrastructure Levy
Dpa	Dwellings per annum
DtC	Duty to Co-operate
ED	Evidence Document
EZ	Enterprise Zone
GI	Green Infrastructure
GTAA	Gypsy and Traveller Accommodation Assessment
HIS	Housing Implementation Strategy
HMA	Housing Market Area
IDP	Infrastructure Delivery Plan
KDC	Key Development Consideration
LCC	Lancashire County Council
LP	Local Plan
LPA	Local Planning Authority
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively assessed need
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SD	Submission Document
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SUDS	Sustainable Drainage Systems
WBC	Wyre Borough Council

Non-Technical Summary

This report concludes that the Wyre Local Plan (LP or Plan) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [MMs] are made to it. Wyre Borough Council (WBC) has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

Many of the MMs concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared a Schedule of the proposed MMs and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. My recommendations on the MMs take into account all the representations made in response to consultation on them. In some cases I have decided not to recommend the MM, amended their detailed wording or made consequential modifications where necessary.

The Main Modifications can be summarised as follows:

- Increasing the housing requirement and adjusting the spatial distribution of development to reflect opportunities to support development in locations which are or can be made sustainable
- Demonstrating exceptional circumstances for the release of Green Belt land
- Clarifying the components of housing land supply, the assumptions that will be relied upon to calculate the five-year supply and the role of a Housing Implementation Strategy
- Clarifying the components of employment land supply and ensuring employment policies are effective
- Ensuring that the strategic and generic policies, including those relating to the Green Belt and housing, are positively prepared, justified, effective, consistent with national policy, and clear to the decision maker
- Reducing the scale of the allocations at Inskip, Forton and Raikes Lane, Thornton so that they are positively prepared
- Increasing the scale and capacity of the allocations at Blackpool Road, Poulton-le-Fylde and Cockerham Road, Garstang so that they are positively prepared
- Adjusting the capacity and delivery from some of the other allocations to reflect up-to-date information
- Modifying the allocations' Key Development Considerations so that they are justified and effective
- Requiring an early review of the LP so that objectively assessed housing needs are fully met over the Plan period

Introduction

1. This report contains my assessment of the Wyre Local Plan (LP or the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first consultation arrangements and whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. Paragraph 182 of the National Planning Policy Framework 2012 (NPPF or the Framework) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised NPPF was published in July 2018. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework.
2. The starting point for the examination is the assumption that the local planning authority (LPA) has submitted what it considers to be a sound plan. The Wyre Local Plan Publication Draft dated September 2017, submitted in January 2018, is the basis for my examination (Submission Document (SD) 001). It is the same document that was subject to consultation between September and November 2017. A Schedule of Minor Modifications (SD003a) was also submitted alongside the Publication Draft but as this was not subject to consultation I am not treating it as a formal addendum to the Plan. I have included some of the modifications as Main Modifications (MMs) as appropriate. The remainder have been included as Additional Modifications (AMs). I have been provided with the representations on the Publication Draft and have taken them into account in my examination of the Plan and this report.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any MMs necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, many of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1, MM2, MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs which I considered were necessary for soundness and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks during September and October 2018. I have taken account of the consultation responses in coming to my conclusions in this report. In the light of the consultation responses I have not recommended some MMs, made some amendments to the MMs and made consequential amendments to others as necessary. None of the amendments undermines the participatory processes and SA that have been undertaken. Where necessary I have highlighted these amendments in the report.
5. The Council has also proposed some AMs which have also been publicised. But as these do not go to soundness I do not need to address them in this

report.

Policies Map

6. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as the Publication Draft Wyre Local Plan Policies Map September 2017 (SD002).
7. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective. I have referred to these changes to the Policies Map within the report.
8. These further changes to the policies map were published for consultation alongside the MMs. In this report I identify any amendments that are needed to those further changes in the light of the consultation responses.
9. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in SD002 and the further changes published alongside the MMs incorporating any necessary amendments identified in this report.

Consultation

10. The Council has produced a Statement of Community Involvement (SCI) (Evidence Document (ED) 006) and a Statement of Consultation (SD007 and EL9.002) under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (LP Regulations). The Statement of Consultation indicates that the Council has given the public and organisations such as Parish Councils the opportunity to be involved, and to make representations, at various stages of the LP preparation process in accordance with the SCI.
11. There has been some criticism of the Council's approach to consultation, including a failure to update the SCI which was produced in 2010 and the introduction of allocations at later stages of the LP process. However, the Council has based its consultation techniques on the SCI, albeit modified over the subsequent period to take into account factors such as new technology. The fact that the SCI has not been updated does not make the consultation processes inadequate. Moreover, as part of an evolving process it is inevitable that some sites emerge at different stages.

12. Although the use of digital means of communication and consultation have been the default, hard copies of the Plan and evidence documents were made available at key public buildings around the Borough. The local press and promotional material have supplemented the use of the Council's website and social media. Paper consultation forms were provided on request and representations in writing have been accepted.
13. 'Drop in' sessions and meetings and briefings with Parish and Town Councils have been held at various locations in the Borough between 2014 and 2017. This has allowed the public and their representatives to engage with Council Officers. Meetings with Parish and Town Councils were held on a confidential basis prior to formal consultation as potential allocations were in draft form and WBC were seeking feedback on a 'without prejudice' basis. These meetings have not been a substitute for the formal public consultation which has followed.
14. Some suggest that people have not been listened to. However, it appears that the Council has taken into account views expressed. Moreover, positive preparation of a plan does not mean that all will be satisfied with the outcome. There is a balance to be struck between the requirements of national policy, the development needs of the area and environmental constraints.
15. The Council has exceeded the consultation requirements in the regulations and complied with the spirit of its own SCI.

Assessment of Duty to Co-operate (DtC)

16. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
17. I have had regard to the Statement of Compliance with the DtC (SD008) in considering whether the DtC has been met. The Statement includes a Memorandum of Understanding with the other authorities on the Fylde Coast and Lancashire County Council (LCC).
18. The Fylde Coast Authorities (Wyre, Fylde and Blackpool) commissioned a joint Strategic Housing Market Assessment (SHMA) for the Housing Market Area (HMA). Subsequent Addendums have principally honed in on Wyre but under the umbrella of work at HMA level. Joint studies have also been carried out between the three authorities covering retailing and gypsies and travellers.
19. Whether Wyre can meet its own Objectively Assessed Needs (OAN) for housing has been a significant issue for the examination. The adjoining authorities of Blackpool, Lancaster and Preston have been approached about meeting any unmet needs but have not offered to do so due to their own constraints and the stage which their plans have reached. Fylde's Local Plan which was adopted in October 2018 includes reference to the possibility of an early review to meet any need that cannot be met in Wyre but this does not constitute a firm commitment. Therefore, despite proposed MMs referred to elsewhere within this report bringing the housing provision within Wyre closer

to the OAN, it is recognised that an early review of the Wyre LP will also be necessary to ensure OAN is fully met over the Plan period. This is articulated by **MM2** and **MM3** in order to achieve a positively prepared development plan moving forward. I have amended the wording of the MMs to reflect the objective of Wyre meeting its own housing OAN. The DtC is not a 'duty to agree' and within this context the evidence shows sufficient cooperation within the Fylde Coast HMA and beyond in relation to housing needs.

20. The Council has also engaged with LCC and Highways England in identifying transport constraints and infrastructure requirements, some of which go beyond the Borough's boundaries. Both bodies have been active in supporting the LP through both its preparation and examination stages. There has also been cooperation with LCC as Local Education Authority and other infrastructure providers such as the Clinical Commissioning Groups, the Environment Agency and United Utilities. All these bodies have fed into the Infrastructure Delivery Plan (IDP) (ED004 and EL8.004).
21. Other consultees including Natural England, Historic England and Sport England have engaged in the preparation of LP policies, proposals and supporting evidence. The former together with constituent authorities, including Wyre, contribute to the Forest of Bowland Area of Outstanding Natural Beauty (AONB) Management Partnership which itself has been working towards a common policy approach for the AONB.
22. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

23. The LP has a plan period of 2011-2031 and deals with strategic and other land use policies and allocations for the whole of the Borough. It will replace the Wyre Borough LP (July 1999) and the Fleetwood-Thornton Area Action Plan (September 2009) in their entirety as set out in Appendix A of the Plan. The only high-level policies not covered are those that relate to minerals and waste which are dealt with by the Joint Lancashire Minerals and Waste Local Plan. The only other development plan documents envisaged are neighbourhood plans that may come forward during the plan period. In this respect neighbourhood plan areas have been designated in Barton, Dolphinholme and Garstang. **MM1** clarifies what is likely to constitute the development plan in the interests of a positively prepared and effective LP.
24. Some of the representations on the Plan refer to the merits of sites which have not been allocated – omission or alternative sites. However, the purpose of the examination is to consider whether the submitted Plan is sound. So the focus of this report in relation to sites will principally be on whether the process followed by the Council in selecting the allocations is sound and whether those allocations will meet the development requirements, not on the merits of other sites as alternatives.

Main Issues

25. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified eight main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Whether the strategy for the distribution of development is justified and whether strategic policies are positively prepared, effective and consistent with national policy.

The spatial distribution of development

26. The Council's approach to the distribution of development has been largely determined by highway capacity and to a lesser extent by flooding and green belt constraints and the amount of deliverable land. Therefore, of the three possible strategic approaches considered at Issues and Options Stage, the Fylde Coast peninsula focus and A6 corridor focus options were discounted. The peninsula is constrained by limited capacity on the A585, flood risk, green belt separating the main settlements and, in the case of Fleetwood and Cleveleys, a lack of deliverable land. The A6 corridor is affected by highway capacity issues at Junction 1 of the M55 and along the A6.
27. The third option put forward in 2015 was that of dispersal, accommodating moderate levels of development in a number of larger settlements with limited development in smaller settlements. The current strategy, although something of a hybrid, has largely been derived from this option, albeit that consolidation of the hamlets of Winmarleigh and Nateby to the north-west and west of Garstang has not been carried forward due to the rural character of these settlements. The Sustainability Appraisal (SA) of August 2017 (SD005a) assessed the Council's hybrid approach and came to the view that it demonstrated sustainability benefits compared to the other approaches assessed at the earlier stage.
28. As I explain later in this report when discussing the housing requirement, I consider that the highway constraints are overstated. That said I accept that they should have some influence on the strategy as do flood risk and green belt protection. Therefore, the approach of dispersing development across the main settlements in the Borough rather than focusing the majority in one particular area is justified.
29. However, the LP as submitted does not explain the 'managed dispersal' approach clearly. Moreover, those towns which are best able to capitalise on sustainable transport modes and minimise the need to travel and where there is developable land, such as Poulton-le-Fylde and Garstang, do not maximise opportunities to meet identified needs. At the same time significant levels of development are targeted at some of the rural settlements where residents would need to travel to access employment and services and with limited transport options other than the private car. Therefore, **MM3** is necessary to achieve a shift in the distribution of development but explain that this is still within the context of 'managed dispersal' so that the Plan is positively prepared and justified.

30. Paragraph 157 of the Framework states that, amongst other things, Local Plans should indicate broad locations for strategic development on a key diagram. The submitted Plan does not include a key diagram. This would be rectified by **MM3** which would ensure that the LP is consistent with national policy.

Settlement hierarchy

31. The LP proposes a hierarchy of settlements under Policy SP1. There are effectively five tiers of settlements with the Urban Towns of Fleetwood, Poulton-le-Fylde, Cleveleys, Thornton and Normoss in the top tier, the Key Service Centre of Garstang on its own in the 2nd tier, the Rural Service Centres of Knott End/Preesall, Great Eccleston, Hambleton and Catterall comprising the next tier and the remaining villages split into the bottom two tiers of Main Rural Settlements and Small Rural Settlements.
32. The position of the settlements in the hierarchy is supported by the Wyre Settlement Study and its addendum (ED114 & 115) which factor in indicators such as population levels and access to services and facilities in arriving at the rankings.
33. Inskip is defined as a Main Rural Settlement along with nine other villages. These settlements have population levels generally between the Rural Service Centres and Small Rural Settlements with some access to services and facilities. Inskip does not have a shop but benefits from a primary school, recreational facilities, churches, community hall and public house. There are weekday and Saturday bus services linking the village with Preston, Great Eccleston, Blackpool and Poulton-le-Fylde. Population in the village is higher than six of the villages in this tier. The definition of Inskip as a Main Rural Settlement is justified as is the remainder of the hierarchy.
34. In the context of the growth strategy of 'managed dispersal' the proportion of development earmarked for each tier in the hierarchy is broadly appropriate. For example, the majority of development (58% of housing growth and 59% of employment growth) is to take place in the top two tiers. **MM3** and **MM5** will achieve some necessary rebalancing to steer a modest increase in development to the more sustainable settlements in the top two tiers (60% of both housing and employment growth).
35. There are inevitably going to be disparities between the level of development allocated to different settlements in the same tier depending on specific constraints and the availability of land. For example, in relation to the Main Rural Settlements, St Michaels and Pilling are constrained by surrounding land that falls in Flood Risk Zone 3. Highway constraints affect some settlements more than others. I return to whether the specific level of allocations for particular settlements is justified under Issue 7.
36. There is a reasonable alignment between housing and employment growth within the hierarchy as set out in Policy SP1. The principal discrepancy is at the Main Rural Settlement level where housing growth will outstrip employment growth. However, relatively high proportions of employment growth are proposed in the Key Service Centre, Rural Service Centres and Rural Areas which would partially serve the employment needs of other villages.

Green Belt

37. The Framework states that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the LP. The submitted Plan proposes some release of Green Belt in Poulton-le-Fylde and Fleetwood.
38. Poulton-le-Fylde is at the top of the settlement hierarchy, has a good range of services and facilities and is well served by sustainable travel modes, including the Borough's only railway station. Although traffic congestion is highlighted as an issue, it is a location where significant allocations would contribute to meeting the housing requirement in a sustainable manner. Green Belt land to the north and south-west of the town is critical in preventing the merging of Poulton-le-Fylde and Carleton with Thornton, Cleveleys and Blackpool. Some non-Green Belt land has been allocated to the east and south-east of the town but other non-Green Belt land is either affected by flood risk or would require major road infrastructure. Moreover, sites on the periphery of the built-up area are not particularly well-related to the town centre and other key facilities.
39. The Green Belt Study (ED109) assessed individual parcels of land within the Green Belt and recommended that three parcels could be considered for removal as they made limited contributions to Green Belt purposes.
40. Two of the three parcels are in Poulton-le-Fylde to the south of Blackpool Road. The overall site comprising the two parcels is close to the town centre and within walking distance of the railway line. It is the most sustainably located greenfield site in the town. Moreover, the Green Belt Study indicates that the land does not play a significant role in preventing neighbouring towns merging as it already lies solely within the built-up area of Poulton. The release of the land from the Green Belt would make a significant contribution to meeting housing needs in a sustainable location and would cause limited harm to the Green Belt.
41. The parcel of land in Fleetwood proposed for release at Cardinal Allen School does not separate settlements but lies between two parts of the town. It does not serve any Green Belt purpose. Moreover, as it comprises school playing fields, its protection through the proposed Green Infrastructure (GI) designation is more appropriate.
42. The Plan shows a small area of previously-developed land to the north of Norcross Lane as being maintained as Green Belt. However, although part of a larger parcel which is significant in preventing neighbouring towns merging, the particular area of land is bounded to the east by a modern building, contains hard surfacing and high security fencing and has outline planning permission for mixed use development as part of a scheme that covers most of the adjacent housing allocation SA1/11. It can be distinguished from the remainder of the parcel which is more open. Taking into account its condition, planning status, relationship to the allocation and the limited contribution to Green Belt purposes, its removal from the Green Belt is justified and would be secured by **MM3**, **MM7** and **MM60**. There would be a corresponding change to the Policies Map.

43. For the above reasons exceptional circumstances exist to justify the release of the three sites from the Green Belt. In relation to the land to the south of Blackpool Road, the Plan proposes the release of the entirety of the open land in the triangle between the B5267, the B5268 and the railway line. The residual area that does not form part of the allocation is not designated as 'safeguarded land' as it does not lie between the urban area and the Green Belt. However, it would ensure the permanence of the Green Belt in the long term, providing further opportunities for sustainable patterns of development beyond the Plan period. I have referred to the residual land as 'undesignated land' rather than 'white land' within **MM7** as the latter has no meaning within national policy.
44. The exceptional circumstances to support the release of Green Belt land should be more clearly articulated within the Plan to justify the proposals in the context of national policy. This would be achieved by **MM3** and **MM7**.
45. Policy SP3 seeks to replicate national policy in terms of the definition of inappropriate development. The Planning Practice Guidance (PPG) indicates that there is no need for the LPA to reiterate policies that are already set out in the Framework. Moreover, there are changes in Green Belt policy in the revised Framework which will lead to the development plan policy being inconsistent with national policy and quickly out of date. Therefore, to ensure consistency, SP3 should refer to national policy not seek to repeat it. This would be secured by **MM8**.
46. Sections 5 and 6 of Policy SP3 are constructed in a way that implies that operational development relating to educational establishments and service infrastructure in the Green Belt does not need to meet the very special circumstances test elsewhere in the policy and within the Framework. These parts of the policy need to be changed so that they are consistent with national policy whilst retaining the reference to specific local considerations (**MM8**).

Settlement boundaries and the countryside

47. The LP defines boundaries for settlements referred to within the hierarchy. Settlement boundaries provide a degree of certainty for local communities, balancing development opportunities against environmental considerations. In this respect the principle of settlement boundaries is supported.
48. Only certain forms of development would be supported outside settlement boundaries. Other new development in the Green Belt and countryside is to be restricted. Policy SP4 goes beyond the Framework in protecting the countryside for its own sake. Moreover, the policy does not include any balancing of harm to the open and rural character of the countryside against the potential for a development to achieve substantial public benefits. Therefore, the policy requires modification to ensure consistency with national policy which would be achieved by **MM9**.
49. Section 4 of Policy SP4 establishes a hierarchy of uses for the conversion of existing buildings in the countryside, with employment and tourism uses being seen as preferable to residential uses. There are some tensions with this approach in comparison with paragraphs 55 and 90 of the Framework which allow homes through the re-use of buildings, including in the Green

Belt. In addition the permitted development regime has introduced greater flexibility for changes of use. However, paragraph 28 of the NPPF specifically refers to the conversion of existing buildings in supporting sustainable growth in rural areas. This seems to be a more positive and permissive part of national policy than the exceptions allowed by paragraphs 55 and 90. Taking into account the rural character of the Borough outside the main settlements, the Council's hierarchical approach is justified and not at odds with national policy.

Strategic Areas of Separation

50. Section 6 of Policy SP1 refers to six 'strategic areas of separation'. Based on what I saw and taking into account the Green Belt and Strategic Areas of Separation Background Paper (ED008), these areas are distinct undeveloped gaps beyond the Green Belt which help to protect the character and rural setting of the settlements and are deserving of the additional layer of policy protection. Most of the open land between Fleetwood and Thornton is protected by Green Belt but the land to the east of the former Thornton-Fleetwood railway line is not. Although it is questionable whether this marshy area is developable, it functions as part of the gap and therefore inclusion within the policy is justified.
51. The 'strategic area of separation' between Forton and Hollins Lane is very narrow in the critical area to the east of the A6 close to the latter settlement. Moreover, that part of the strategic allocation at Forton (Policy SA3/4) to the south of Sunnybank Nurseries and west of the A6 would lead to a coalescence of the settlements taking into account allocation SA1/14 at Hollins Lane with only the line of the A6 providing separation. Therefore, for Policy SP1 to be positively prepared and justified **MM83** is needed which would reduce the extent of the Forton allocation and extend the 'strategic area of separation'. There would be a corresponding change to the Policies Map.

Other strategic policies

52. As previously stated there is no need for the LPA to reiterate policies that are already set out in the Framework. Sections 1-3 of Policy SP2 recite the presumption in favour of sustainable development at paragraph 14 of the NPPF. This would give the presumption development plan weight which would potentially weaken other policies within the Plan. Moreover, the wording of national policy in relation to the presumption has changed with the revised Framework. Therefore, the first three sections of the policy are not necessary and should be deleted by **MM6**.
53. As Policy SP2 is the overarching policy for sustainable development in the Borough it should recognise (1) the potential for development to contribute to the three dimensions of sustainable development; (2) the need to maximise the use of previously developed land; and (3) how design can reduce the effects of climate change. **MM6** would ensure that Policy SP2 is justified and consistent with national policy in these respects.
54. Policy SP4 deals with countryside areas including a Coastal Change Management Area. The Management Area to the north of Pilling shown on

the Policies Map needs to be extended so that it reflects the area likely to be affected by physical changes to the coast and the policy is justified, effective and consistent with national policy.

55. The Framework affords great weight to conserving landscape and scenic beauty in AONBs. This should be reflected in the wording of Policy SP5 which relates to development within and affecting the setting of the Forest of Bowland AONB. The policy also makes reference to allocations for major development in the AONB but there is none. **MM10** would ensure that Policy SP5 is consistent with national policy and effective.
56. Policy SP8 relating to health and well-being is contradictory in that it fails to recognise that development likely to have an adverse impact on public health will contribute to a negative impact on the health of the population. **MM13** would ensure that the policy is effective by making reference to potential effects and unacceptable impacts.

Conclusions on Issue 1

57. I conclude that, subject to the MMs proposed, the strategy for the distribution of development is justified and the strategic policies are positively prepared, effective and consistent with national policy.

Issue 2 – Whether the amount of housing and employment land proposed in the LP is appropriate to meet the needs of the District

The Housing OAN

58. The 2014 SHMA (ED085) and its addenda have followed the methodological steps for calculating the OAN set out in the PPG, using at that time the latest published household projections as a starting point. The approach has been consistent across the three Fylde Coast LPAs.
59. An OAN figure of 479 dwellings per annum (dpa) has been used for the submitted LP. This is at the upper end of the OAN range concluded within the February 2016 SHMA Addendum (ED087) but supports the Council's strategy of jobs growth and responding to the scale of identified affordable housing needs. It also reflects positive market adjustments to address suppressed younger household formation rates, modest worsening market signals and the impact of a notable fall in housing supply over recent years on official population projections.
60. The subsequent Addendum in September 2017 (ED088) took account of the 2014-based sub-national household projections and the Employment Land Study Update of July 2017 (ED107). The latter forecast strong jobs growth over the remainder of the Plan period. In order to balance a modest decline in the working age population, not constrain jobs growth and reflect market signals, a minimum OAN of 457 dpa was considered reasonable. However, taking into account the uncertainties in forecasting future labour force behaviours and the need for flexibility in making adjustments for market signals, 479 dpa was still considered to be a reasonable upper limit for the OAN. Such a level would avoid a marked fall in the Borough's working age population.

61. The most recent calculation of affordable housing need (ED088) identified an annual need of 134 homes over the next five years with that figure rising to 189 dpa in subsequent years taking into account affordable housing supply. To meet this longer-term need in full would require a fourfold increase in affordable housing delivery compared to historic rates and an unrealistic uplift in the overall level of completions. The SHMA considers the relationship between affordable housing provision and market housing and the different approaches prescribed in the PPG for estimating affordable housing need. The OAN figure considers positive adjustments to the demographic projections to deal with affordability. However, neither the Framework nor the PPG require that affordable housing need be met in full.
62. Following the hearings in September 2018 the Office for National Statistics (ONS) published the 2016-based household projections. This latest data set suggests a reduced household growth of some 668 households in Wyre compared to the 2014-based projections. However, given that household projections are a starting point, the same factors referred to above would need to be applied and would still support a considerable uplift on the demographic forecasts.
63. The 2018 Framework refers to the new standard method of assessing housing need set out in the PPG. However, this LP is being examined under the 2012 Framework. Moreover, the Government is considering how the standard methodology should be adjusted to take into account its objective of ensuring that 300,000 homes are built each year.
64. Overall and in the context of the Government's objective of significantly boosting the supply of homes, the OAN figure of 479 dpa is justified and has not been countered by any alternative robust analysis.

The Employment OAN

65. Experian economic forecasts have been used as a basis for determining future employment land requirements. The forecasts have been subject to sensitivity testing using two additional econometric job projections from Oxford Economics and Cambridge Econometrics and found to be robust.
66. ED107 recommended an employment OAN range of between 32 and 47 ha using the 2017 Experian economic forecasts. In order to make a reasonable allowance for losses, some market choice and a potential requirement from existing businesses for additional land, a figure towards the upper end was chosen (43 ha). This is commensurate with the past take-up scenario so includes some flexibility. It is comparable with the approaches within Fylde and Blackpool, the two other authorities which share functional economic market and travel-to-work areas.
67. The 2015 and 2017 addenda to the SHMA take into account the findings of the corresponding Employment Land Studies such that there is reasonable alignment between the housing and employment figures. The Employment OAN figure is justified.

The housing requirement

68. The Framework requires that Local Plans should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
69. The submitted Plan makes provision for 8,224 dwellings which equates to 411 dpa. This is about 1,350 dwellings below the OAN figure of 9,580 dwellings, the equivalent of a reduction of 68 dpa. The Plan cites highway capacity, flood risk and a lack of deliverable development land within urban areas as reasons why the OAN cannot be met.
70. In terms of flood risk constraints, much of Over Wyre and areas around the peninsula and A6 corridor are affected by flood risk, but there is sufficient land around the higher order settlements of Poulton-le-Fylde, Thornton, Garstang, Great Eccleston, Preesall, Hambleton and Catterall which is beyond Flood Zones 2 and 3 to support an alternative strategy and indeed meet the full OAN. Therefore, flood risk should not be seen as an overriding constraint.
71. Similarly, there appears to be a shortage of developable land in the urban areas of Fleetwood and Cleveleys, towns which are constrained by Green Belt, but not so along the A6 corridor or indeed around Poulton-le-Fylde, Thornton or in parts of Over Wyre. So developable land is not an overriding constraint.
72. With regard to highway capacity, it has had the effect of not only limiting the strategy options but also constraining the ability to meet the OAN. Thus information on highway capacity forms a crucial component of the evidence base. LCC's report (ED094a) is helpful in understanding the constraints of the options and particular settlements/sites. However, it is necessarily a high level primarily desktop assessment. Moreover, although having regard to committed schemes, it does not appear to robustly model how new transport infrastructure could cost effectively limit the significant impacts of development.
73. Proposed transport infrastructure includes the committed highway improvement schemes within the IDP, the Poulton-le-Fylde Highway Mitigation Strategy, the A6 Corridor Highway Mitigation Strategy and other off-site improvements which could be developed to mitigate localised highway impacts. Some of these planned and potential improvements do not appear to have been taken into account as measures to mitigate adverse transport impacts now so that the LP plans positively for the development and infrastructure required.
74. Moreover, the need to focus significant development in locations that can be made sustainable and where the use of sustainable transport modes can be maximised is in my view not given sufficient weight in the analysis and the highway caps proposed by LCC and taken forward by WBC. For example, along the A6 corridor affected by the Severe Restriction Zone (n1) there are existing and proposed employment opportunities, a range of services and facilities, particularly in Garstang, and the opportunity to use and build upon sustainable modes of travel. Similar factors would apply in Poulton-le-Fylde

and to a lesser extent in Thornton. In contrast the effect of the highways cap pushes large scale development to locations such as Inskip and Forton, increasing the reliance on the private vehicle and leading to longer distance travel.

75. One option would have been to suspend the examination to allow the highway and transport evidence to be robustly reviewed. However, this could take some time. I can understand the Council's desire to get a LP in place as soon as possible so that development is plan led, policies are up-to-date, and allocations can be made which would boost the provision of housing and ensure a five-year supply. Moreover, the Framework only requires LPAs to provide a supply of specific deliverable sites for the next five years and then for years 6-10 a supply of sites or broad locations for growth.
76. In this regard I support a two-stage approach. In terms of the submitted LP there are some modifications that will increase supply and support a housing requirement closer to the OAN. Firstly, there are opportunities for some modest increases in housing provision in some locations which would not lead to severe residual highway cumulative impacts based on the existing evidence base and representations. The effects on the strategy are set out in relation to Issue 1 (paragraph 29 refers) whereas specific sites are dealt with under Issue 7. In addition, adjustments can be made in relation to some of the other components of housing supply which I address below under Issue 3. Overall these changes would lead to an increase in the housing requirement to 9,200 dwellings or 460 dpa, some 96% of the OAN. **MM2-MM5, MM21, MM22, MM23** and **MM48** would secure these changes and also emphasise that the housing provision should be expressed as a minimum so that the Plan is positively prepared, justified and effective.
77. The addendum to the SA (EL7.002) assessed the implications of a figure close to 460 dpa alongside lower and higher figures and came to the view that the scenario would deliver a more balanced approach.
78. Alongside the MMs to the submitted LP referred to above, there should be a commitment to an early partial review of the Plan with the objective of meeting the OAN within the Plan period. As part of the review transport and highway issues would need to be revisited, including the effects of committed highway schemes, the scope for sustainably located sites and additional infrastructure requirements. The review should also seek to secure some flexibility in housing supply. A new policy (LPR1) to cover the need for a review is proposed through **MM90** to ensure a positively prepared and justified LP. **MM89** explains the reasons for the review and also its likely scope. Consequential amendments to the Plan are dealt with by **MM2, MM3** and **MM22**.

Conclusions on Issue 2

79. I conclude that, subject to the MMs proposed and in particular the requirement for an early review, the amount of housing and employment land proposed in the LP will be appropriate to meet the needs of the District.

Issue 3 – Whether the housing requirement will be met; whether those means of meeting the requirement have been justified and will be effective; and whether the LP will be able to maintain a five-year housing land supply

Components of supply

80. Chapter 7 of the LP addresses, amongst other things, housing land supply. However, it is not explicit in setting out the components of housing supply. This would be rectified by **MM22** which includes a table setting out the position at 31 March 2018 in terms of contributions from completions, commitments and allocations together with explanatory text. A consequential amendment is required to the table showing dwelling numbers and employment land for each settlement as at 31 March 2018 to form Appendix E to the LP (**MM3**). The modifications ensure that the LP is effective in setting out how housing will be delivered and how the housing requirement will be met.
81. The LP does not make any allowance for windfalls. However, only sites with a capacity of 25 dwellings or more are to be allocated in the LP. Past completion rates on non-allocated sites of less than 25 dwellings during the period 2011 to 2018 have ranged from 88 to 147 dpa with an average of 111 dpa. Whilst these numbers have come forward in a period when there has been no up-to-date LP, they indicate compelling evidence that such sites have consistently become available. Highway capacity issues are unlikely to be an overriding constraint to relatively small sites coming forward.
82. On this basis there is justification for a modest contribution of 50 dpa from windfalls for the last 10 years of the Plan period (2021-2031) providing a reliable source of supply. **MM22** makes clear the contribution from windfalls so that the Plan is justified and effective. The contribution avoids potential double counting from commitments as windfalls only kick-in three years after the housing land monitoring base date of 31 March 2018.

Housing trajectory, housing implementation strategy and five-year housing land supply

83. Paragraph 47 of the Framework indicates that LPAs should illustrate the expected rate of housing delivery through a housing trajectory for the Plan period and set out a housing implementation strategy (HIS) describing how a five-year supply of delivery will be maintained to meet the housing target. In order to rectify omissions in the submitted Plan a HIS has now been provided which includes a housing trajectory. The HIS is to be updated annually alongside the Annual Monitoring Report. This is explained by **MM22** and **MM89** which are required to ensure that the LP is effective.
84. There has been a shortfall in provision against the requirement since the 2011 base date of the Plan of some 1179 dwellings. The Plan, through the housing trajectory, proposes to spread the shortfall over the remainder of the Plan period (the Liverpool approach) rather than making up the shortfall in the next five years (the Sedgefield approach). The PPG favours the Sedgefield approach but no one approach is prescribed by national policy. Applying the Sedgefield approach would not be realistic as it would set a 5-year housing requirement that is unlikely to be delivered and would risk the

LP being out-of-date soon after adoption. The use of the Liverpool approach is justified. The LP would still achieve a significant boost in the supply of housing.

85. In identifying a five-year supply of deliverable housing sites, the Framework requires an additional buffer of 5% or 20% to be added, the latter to be applied where there has been a record of persistent under delivery against the housing requirement. Although not explicit, the LP applies a buffer of 5% comparing completions since 2011 against the defunct Regional Spatial Strategy (RSS) requirement. However, using the RSS requirement would not be appropriate as it falls well short of the OAN for the period 2011-18. Using the up-to-date OAN of 479 dpa or indeed a housing requirement of 460 dpa, Wyre has not met its housing target in any of the seven years since 2011. Therefore, there has been a record of persistent under delivery and a buffer of 20% should be applied.
86. The LP should clearly express the key assumptions and parameters which will be relied upon to calculate the five-year housing land supply. **MM22** would ensure that reference is made to the Liverpool approach and the 20% buffer so that the LP is effective and consistent with national policy. An amendment is also required to Policy HP1 to delete reference to how a shortfall in any one year is made up as this clause misinterprets the advice within the PPG as it does not relate specifically to shortfall in delivery since the start of the Plan period (**MM23**).
87. The housing trajectory makes assumptions about delivery rates from commitments and allocations including likely lead in times and build out rates. These are set out in the Housing Background Paper (ED010). Applying these rates suggests that some sites may deliver more housing within the LP period than projected. This would result in an upward adjustment in the number of houses that could be delivered in the Plan period as referred to in paragraph 76 and reflected in **MM2-MM5, MM22-MM23** and **MM48**. I deal with delivery from individual sites under Issue 7.
88. The housing supply calculations underpinning the LP assume a lapse rate of 10% for small site commitments but none for large site commitments. This is supported by evidence within ED010 about previous lapse rates which since 2004 have fluctuated between 0.2 and 3% but with most lapsed permissions relating to small sites.
89. Taking into account the above factors the housing trajectory set out in Appendix 1 to the HIS shows that supply would be above five years on adoption of the LP using the base date of 31 March 2018. The review mechanism gives me the comfort that a five-year supply can be maintained up to at least 2031.
90. Indicators within Section 10 of the LP will monitor delivery of homes against the housing trajectory. These indicators need to be modified to reflect the revised requirement, the role of the HIS and an effective LP (**MM91**).

Conclusions on Issue 3

91. I conclude that, subject to the MMs proposed, the housing requirement will be met, the means of meeting the requirement have been justified and will

be effective, and the LP will be able to maintain a five-year housing land supply.

Issue 4 - Whether the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers

Housing mix

92. The Framework requires that LPAs provide for a mix of housing based on future and demographic trends, market trends and the needs of different groups in the community. Policy HP2 refers to developments providing an appropriate mix of housing in terms of size, type and tenure taking into account the most up to date SHMA. This approach is consistent with the Framework's objectives. The examination also revealed that Rural Affordable Housing Needs Surveys may provide more detailed and up-to-date evidence to build on the SHMA, so it is appropriate that Policy HP2 also makes reference to this potential information so that it is positively prepared (**MM25**).
93. Policy HP2 also seeks that 20% of homes on developments of 20 dwellings or above should be designed so that they are adaptable for older people or those with restricted mobility. These requirements reflect that the proportion of the population in the Borough within the older age groups will grow during the LP period. **MM21** provides more explanation to support the need for dwellings to allow older people and those with restricted mobility to live independently. **MM24** clarifies that the requirement applies to both market and affordable housing. But **MM24** also makes it clear that it is not the intention to impose the Building Regulations optional standards in relation to accessibility and space. These modifications ensure that Policy HP2 is justified. **MM91** amends monitoring indicators so that they are measurable and effective against the provisions of Policy HP2.
94. There is limited need for self-build housing taking into account evidence from the self-build register. The small need would be met through the plentiful supply of plots with permission for one or two dwellings.

Affordable housing

95. In the context of the significant need referred to under Issue 2, Policy HP3 proposes that most of the larger developments in the Borough will make provision for 30% affordable housing. However, the LP Viability Study (ED003) indicates that in some areas 30% would not be achievable. Market housing in Fleetwood is unable to support any affordable housing provision and brownfield sites in areas such as Thornton and Cleveleys are only able to support 10% provision.
96. Policy HP3 refers to developments of 10 dwellings or more contributing to affordable housing. At the time of the hearings this did not align with the PPG which set a threshold of 11. However, the revised Framework now states that affordable housing should not be sought for residential developments that are not major developments. Therefore, notwithstanding the transitional arrangements set out in paragraph 1 of this report, a MM

that refers to the 11 dwelling threshold is no longer needed for consistency with national policy. I have amended **MM26** accordingly.

97. In suggesting that the affordable housing requirement could be varied on a case by case basis, notwithstanding ED003, the purpose of Policy HP3 in seeking to maximise the provision of affordable housing is undermined. There are other issues with the policy, namely that the option of providing a financial contribution rather than on-site provision is not worded as an exception; the incremental development of a large site through smaller proposals to avoid affordable housing provision is not prohibited; and the criterion relating to 'tenure blind' design needs to emphasise that affordable housing should be designed as an integral part of developments. These flaws would be rectified by **MM26**, ensuring that Policy HP3 is positively prepared, effective and consistent with national policy. **MM91** amends monitoring indicators so that they are measurable and effective against the provisions of Policy HP3.
98. The size, type, mix and tenure of affordable housing is to be negotiated on a case by case basis taking into account the latest evidence of need. However, the SHMA already provides evidence and should be referenced alongside rural affordable housing needs surveys so that Policy HP3 is consistent with Policy HP2 and is justified (**MM26**).
99. Policy HP7 allows for rural exception sites for affordable housing in certain circumstances. Rural exception sites would not be necessary in an area if the identified needs can be met by an allocation and the operation of Policy HP3. This is made clear by **MM29** to ensure that the policy is justified.
100. The policy refers to need in the locality but the latter is not defined. This would be rectified through **MM29** and **MM30** which would insert a footnote to tie 'locality' with the wards which are used for the rural affordable housing needs surveys so that the policy is effective. The Council has considered whether Policy HP7 should be modified to allow some market housing to facilitate the provision of additional affordable housing. However, its position that market housing could increase expectations and land values has not been contradicted by any substantive evidence.

Gypsies, travellers and travelling showpeople

101. The need for accommodation for gypsies, travellers and travelling showpeople has been considered through the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) 2014 (ED078) and the GTAA 2016 update (ED079). The GTAA did not identify any need for gypsies and travellers but a need for some 19 plots for travelling showpeople.
A Technical Note (ED012d) updated the requirement to 20 plots based on additional information. The need for 20 plots is referenced within Policy HP8.
102. The GTAA 2016 update took into account the revised definition of gypsies and travellers for planning purposes in Planning Policy for Traveller Sites (PPTS) in assessing needs. Desk based research to identify existing authorised and unauthorised pitches and plots was augmented by interviews with residents. Engagement also took place with those living in bricks and

mortar. An estimate was also made of those who may meet the definition but were not able to be interviewed, the unknowns.

103. The LP allocates a site for 20 travelling showpeople plots to the west of the A6 between Garstang and Cabus to meet the need identified within the GTAA (Site SA6). This need arises primarily as a result of the relocation of families from the Kepple Lane site in Garstang which is allocated for housing (Site SA1/18). Site SA6 now has planning permission for 20 plots. The explanation to Policy HP8 should make it clear that Site SA6 meets the need identified by the GTAA so that the policy is effective (**MM31**).
104. The SA6 site comprises predominantly open fields sloping away from the A6 beyond the built-up area of Garstang. The Key Development Considerations (KDC) relating to the site do not require landscaping, open space or pedestrian and cycle links. This would be rectified by **MM87** so that the allocation is positively prepared.
105. Policy HP8 includes criteria against which proposals for new pitches and plots would be considered which are broadly consistent with the PPTS. However, a reference to developments being well planned and landscaped would tie in with paragraph 26 of the PPTS and would assist in assimilating new sites into the landscape (**MM32**).

Other housing policies

106. Policy HP6 addresses rural workers' dwellings. The criteria within the policy provide details as to how the decision maker should consider whether there is an essential need for a dwelling in the context of paragraph 55 of the Framework. In order to ensure consistency with Policy SP4, newly built dwellings should only be considered if there are no buildings available for conversion. In addition, all the criteria should relate to rural workers' dwellings and not the narrower reference to agricultural workers' dwellings. **MM28** would secure these changes so that Policy HP6 is consistent with national policy.
107. Houses in Multiple Occupation are subject to Policy HP10. The reference to 'amenity' in criterion a) is nebulous. In addition, it would be unrealistic for parking and manoeuvring areas to be provided on site in some locations as required by criterion d). **MM35** would ensure that the policy is realistic, clear to the decision maker and justified.

Conclusions on Issue 4

108. I conclude that, subject to the MMs proposed, the policies of the Plan address the needs for all types of housing, including affordable housing and those of different groups in the community such as gypsies and travellers.

Issue 5 - Whether the Plan meets the development needs of business through its allocations and policies

Employment supply and allocations

109. The Plan proposes to meet the employment land requirement of 43 ha through a combination of completions since 2011, development under

construction, commitments and allocations. However, the LP does not make it clear how each of these components will contribute. In this respect **MM36** includes the addition of a table (Table 8.2) with a base date that is consistent with that for housing supply, 31 March 2018, showing how the supply side will be made up. Additional explanatory text is also required to explain the supply position. These changes are needed to ensure that the LP is effective.

110. Although loss of employment land has been generally factored into the requirement calculation, the loss of 2 ha at Clarke House, Norcross was not accounted for, so this also needs to be taken into account. In addition, the Plan should include an explanation of the benefits of the supply side figures exceeding the requirement – flexibility and a more diverse portfolio of sites. These changes would also be secured by **MM36** to ensure a positively prepared and effective LP.
111. Allocations will be provided in the three sub-market areas of the peninsula, A6 corridor and the rural areas. **MM37** updates Policy EP1 to reflect a base date of 31 March 2018 to ensure that it is positively prepared and effective.
112. The 33 ha of employment land to be allocated is made up of employment development (SA2), mixed use developments (SA3) and the Hillhouse Technology Enterprise Zone (EZ) (SA4). In terms of employment development, the site at Valiants Farm, Out Rawcliffe was completed by 31 March 2018 so is deleted as an allocation through **MM77** and **MM78** but counted as a completion in Table 8.2 (**MM36**). As a result Policy SA2 is effective. The contribution from SA2 sites would be about 5 ha. There are consequential amendments to the figures in the relevant table showing the sub-areas' contributions (**MM37**).
113. The inclusion of an employment component within the mixed-use developments would ensure a balance of land uses to reduce the propensity to travel between home and work and support sustainable communities. There is no evidence to suggest that the inclusion of employment land would prejudice the delivery of the quantum of housing development proposed within the allocations. At Forton (SA3/4) the 1 ha of employment land should be well-related to the existing village, modified housing allocation and A6. Therefore, a location on School Lane, adjacent to existing employment at Jesmond Dene, will result in an effective policy (**MM83**). The mixed-use developments (SA3) would bring forward some 15 ha of employment land. The Hillhouse Technology EZ Site (SA4) would deliver the balance of the 13 ha of employment land alongside 250 dwellings.
114. The KDC within the SA3 and SA4 allocations need to be modified to reflect up-to-date flood risk and biodiversity information and deliverable sustainable transport infrastructure. **MM80-85** would achieve these changes so that the LP is positively prepared. For the same reason SA3/1 (Fleetwood Dock and Marina) should recognise the potential to consolidate existing leisure and tourism uses which would assist in regeneration of the town (**MM80**).
115. Additional employment related development would be delivered at the Port of Fleetwood (SA5) but, as the allocation indicates that it should be port related and may not fall within Use Classes B1, B2 and B8, the 7 ha has not been included within the supply side figure. In addition, a 32 ha development

opportunity has been identified in Catterall, comprising an extension to the Brockholes Industrial Estate (SA7). However, due to constraints and uncertainty over delivery it would not be appropriate to count it towards the supply. Should it come forward during the Plan period it would add further flexibility. As with the SA3 and SA4 allocations, KDC relevant to the Port of Fleetwood and Brockholes should reflect up-to-date flood risk and biodiversity information and deliverable sustainable transport infrastructure (**MM86** and **MM88**). The boundary to the Port of Fleetwood allocation shown on the Policies Map requires adjusting so that it includes a link to the highway at its western end so that Policy SA5 is effective.

Protection of employment land and other employment development

116. Existing Employment Areas are identified on the Policies Map and are protected by Policy EP2. Beyond the Existing Employment Areas, sites which are used or were last used for B1, B2 and B8 uses are protected by Policy EP3. The submitted policies include some inconsistencies and repetition. In the case of Policy EP2, it should be recognised that development of part of a site could safeguard or enable provision of employment uses on the wider site. In these respects **MM38** and **MM39** would ensure that the policies are effective and clear to the decision maker.
117. Those sites identified as Existing Employment Areas were assessed as part of the Employment Land and Commercial Leisure Study (EL103 and EL104) and found to have the characteristics, quality and suitability such that they should be maintained in employment use. Both Policies EP2 and EP3 allow redevelopment of employment sites for other uses in certain circumstances. Moreover, Policy SP6 (Viability) allows for forms of development that would not normally be acceptable on grounds of the viability of the scheme. The particular circumstances are made clearer by **MM11** so that Policy SP6 is positively prepared. The policies of the LP do not seek the long-term protection of employment sites where there is no reasonable prospect of the site being used for that purpose.
118. Employment uses within Existing Employment Areas and on land allocated for employment use are supported by the Plan. Elsewhere employment development would be subject to the Core Development Management Policies. In relation to the rural economy Policy EP8 is supportive of the expansion of businesses provided rural character is maintained.

Main town centre uses

119. The retail evidence indicates that there is no need for additional convenience floorspace in the Borough but a need for some 6,500 sq m of comparison floorspace post 2021. No specific allocations are proposed within the LP to meet the need having regard to existing commitments, the scale of the need and redevelopment opportunities within existing centres.
120. Policy EP4 sets out the hierarchy of town, district, local and neighbourhood centres within the Borough. Neighbourhood Centres, although not of significant scale, are protected by Policy EP4 as they are important for the sustainability of communities. The town centre boundary for Garstang shown on the Policies Map should be extended to include the Aldi store so that it is justified and effective.

121. Main town centre uses are steered towards the defined centres by Policy EP5 in accordance with national policy. The policy also addresses the sequential and impact tests. However, in relation to the latter, reference is made to 'no unacceptable impact' whereas the Framework refers to 'significant adverse impact'. Therefore, in order to be consistent with national policy **MM40** is required.
122. That said retail evidence, including vacancy levels, indicates that Fleetwood is particularly vulnerable to out-of-centre development. The LP puts forward contracted town centre boundaries to encourage a more focused and viable retail core. The LP also proposes that the higher test of 'no unacceptable impact' is retained for the town. Taking into account the evidence and my impression of the town centre, the approach within the LP is justified. **MM40** provides further explanation in this regard.
123. The threshold for retail impact assessments within Policy EP5 is 500 sq m which is significantly lower than the default threshold of 2,500 sq m within the Framework. The 500 sq m threshold is based on an analysis of various factors such as the scale of proposals relative to town centres, vitality and viability and the scope for new development¹. Very few units in the centres exceed 500 sq m. It is likely that only a handful of new retail proposals would be caught by the threshold. The threshold is proportionate and justified.
124. The LP defines primary and secondary frontages within the town centres of Fleetwood, Cleveleys, Poulton-le-Fylde and Garstang. Policy EP6 seeks to control non-A1 (retail) uses in the frontages with the objective of retaining greater concentrations of A1 uses in the primary frontages compared to secondary frontages. The criteria for both primary and secondary frontages include a requirement that uses are open for the majority of the daytime. This would be unrealistic for uses such as restaurants and takeaways which can make a contribution to vitality and viability. **MM41** would delete these criteria to ensure a positively prepared policy.
125. Policy EP7 allows local convenience stores within built-up areas. Such facilities can provide sustainably located top-up shopping that is capable of being accessed by residents other than by the private car. The policy achieves a reasonable balance between permitting new stores and protecting existing local and neighbourhood centres. In order to coincide with Sunday trading restrictions a limit of 280 sq m net sales area should be used within the policy. This would be achieved by **MM42** to ensure an effective policy.

Tourism and other business-related policies

126. Tourism makes a significant contribution to the local economy of which holiday accommodation is a key element. Policy EP9 is entitled 'Extensions to Holiday Accommodation' but includes reference to new touring caravan and camping sites. The effect of the policy in preventing other forms of new holiday accommodation is too restrictive. **MM43** and **MM44** would widen the scope of the policy whilst retaining safeguards relating to demonstrating

¹ See Locally Set Floorspace Threshold Advisory Note ED084

viability and landscape impact. A consequential change is required to Policy SP4 (**MM9**). As a result the policy would be positively prepared and clear to the decision maker.

127. Commercial equestrian facilities can serve a need and contribute to the local economy. The criteria within Policy EP10 seek to facilitate both private and commercial horse related activity but with safeguards particularly relating to rural character. As currently worded the policy requires that private stables demonstrate a need for the facility but no such proviso exists for commercial stables. **MM45** would reverse this requirement so that the policy is justified.
128. Community facilities not only support healthy and inclusive communities but also in many cases contribute to the local economy. Policy EP11 seeks to retain such facilities unless it can be demonstrated that the use is not viable. Although in many cases such facilities will be in rural areas, the policy should have a wider application throughout the Borough so that it is positively prepared. This would be achieved by **MM46**.

Conclusions on Issue 5

129. I conclude that, subject to the MMs proposed, the Plan meets the development needs of business through its allocations and policies.

Issue 6 – Whether the Core Development Management Policies and other generic policies are positively prepared, justified, effective, consistent with national policy and clear to the decision maker

130. Policy CDMP1 deals with specific aspects of environmental protection, including noise, contaminated and unstable land, and air quality. Criterion a) is wide ranging and more relevant to a strategic policy. In this respect it is to be included within Policy SP2 through **MM6**. Criterion d) would appear to accept that some deterioration in air quality within an Air Quality Management Area could be contemplated. **MM14** would require that in such circumstances mitigation would minimise any harm to air quality so that Policy CDMP1 is consistent with national policy.
131. Flood risk and surface water management is addressed by Policy CDMP2. However, sustainable drainage systems (SUDS) and greenfield runoff rates are not always achievable. **MM15** would give priority to SUDS and seek greenfield runoff whenever possible which would make Policy CDMP2 effective and consistent with national policy. The policy still recognises the particular issues that Wyre faces with surface water management by containing a more detailed hierarchy of methods of disposal than the PPG.
132. The Framework recognises the contribution that design can make to a low carbon future and minimising energy consumption. In order that Policy CDMP3 (Design) reflects this role and is consistent with national policy **MM16** is required.
133. The definition of Green Infrastructure (GI) within Policy CDMP4 (Section 4) is too wide ranging. To include all countryside areas goes well beyond the definition within the NPPF as many such areas are not multi-functional. The current GI designation covers large expanses of agricultural land in Over

Wyre and to the east of the Fylde Peninsula including the AONB.

134. That said the need to maintain most of the remaining areas of countryside on the peninsula which are not otherwise protected by Green Belt is appreciated as the areas provide an important recreational resource and green lung as well as having landscape and biodiversity benefits. Moreover, it is recognised that some areas of countryside within Over Wyre and the AONB have ecological and geological interest so justify designation. In this respect the definition of GI within the strategic policies chapter, Policy CDMP4 and its explanatory text is modified by **MM3**, **MM9**, **MM17** and **MM18** so that it is justified and consistent with national policy. The tighter definition is reflected in changes to the designation of GI on the Policies Map. There are also some detailed changes to GI on the Policies Map within the built-up areas of Garstang and Fleetwood to reflect the position on the ground which are necessary so that Policy CDMP4 is effective.
135. The terms of Section 15 of Policy CDMP4 are not consistent with other policies within the Plan and are not clear to the decision maker. The reference to mitigation draws on wording more relevant to ecological mitigation. Section 18 of Policy CDMP4 includes a plan making clause from the Framework relating to agricultural land so should be removed. That part of Policy CDMP4 that deals with trees and hedgerows (Sections 22-25) should recognise that they should only be lost if it is essential to allow development to go ahead. The policy should also make reference to Ancient Woodland as well as protected and veteran trees so that it reflects paragraph 118 of the Framework. **MM18** would ensure that these aspects of the policy are consistent with national policy and clear to the decision maker.
136. Policy CDMP5 (Historic Environment) includes reference to substantial harm to heritage assets but not less than substantial harm. Section 8 of the policy dealing with non-designated heritage assets applies a higher bar than paragraph 135 of the Framework. These inconsistencies with national policy would be rectified by **MM19**.
137. Accessibility and transport are dealt with by Policy CDMP6. Two aspects of the policy require further consideration. Paragraph 35 of the Framework recognises that Electric Vehicle Charging Points should be provided where practical. Travel plans are not only relevant to developments that attract large numbers of people but can be applicable to major developments that generate significant amounts of movement such as large housing schemes. **MM20** would ensure that Policy CDMP6 is positively prepared and consistent with national policy in these respects.
138. Policy HP4 deals with extensions to residential curtilages. The terms of Section 3 of the policy are overly restrictive in prejudging that all such extensions within the Green Belt and AONB will be unacceptable. Such extensions would be considered against Policies SP3 and SP5 together with national policy. **MM27** deletes the clause to ensure that Policy HP4 is consistent with national policy.

Conclusions on Issue 6

139. I conclude that, subject to the MMs proposed, the Core Development Management Policies and other generic policies are positively prepared, justified, effective, consistent with national policy and clear to the decision maker.

Issue 7 - Whether the allocations will deliver the housing needed over the Plan period in a manner which is consistent with other policies of the Plan and the NPPF and that necessary infrastructure within and close to the sites is provided alongside the homes

Generally

140. The allocations have arisen from an assessment of sites through the 2017 Strategic Housing Land Availability Assessment (SHLAA) (ED089). Sites were identified from a range of sources including the 2010 SHLAA and two 'call for sites' exercises. Sites were then assessed in three stages, two suitability stages and an availability stage. Sites were sieved out at each stage for reasons relating to suitability e.g. due to specific constraints such as flood risk or nature conservation designations, or availability e.g. information from landowners. This process has been reviewed as part of the SA's consideration of reasonable alternatives.

141. The methodology is broadly consistent with the advice in the PPG. There are some deviations from the guidance but these are explained by the SHLAA and are justified. Although concerns have been raised about some of the site assessments and the extent to which constraints could be mitigated, it seems to me that the overall methodology has been robust and properly considered all reasonable alternatives in seeking to arrive at the allocations necessary to get close to the OAN. In addition, my recommendations relating to some of the allocations are not based on any specific flaws in the SHLAA, more an assessment of the particular impacts of the development proposed having regard to scale, location and an overall balance of the benefits against adverse impacts.

142. LPs should meet the OAN unless the adverse impacts would significantly and demonstrably outweigh the benefits or specific policies in the NPPF indicate that development should be restricted. The exceptional circumstances that justify limited Green Belt release, notwithstanding the Framework's restrictive policies, are discussed under Issue 1 above. Highway congestion is also considered earlier when discussing the strategy and housing requirement. However, additionally, in order to get close to the housing and employment requirement, it is inevitable that significant amounts of greenfield land beyond the Green Belt will need to be developed. This scale of development will have a range of adverse impacts, including urbanising of the countryside, loss of some of the best and most versatile agricultural land around settlements and placing strains on existing infrastructure. It is within this context that I will assess the allocations.

143. The LP has been subject to viability testing through the LP Viability Study. Site specific viability appraisals have been prepared for some of the largest allocations. In addition a representative sample of other housing typologies

have been carried out which would be applicable to the smaller allocations. The testing has applied the policies of the LP, including those relating to affordable housing and infrastructure requirements. Subject to some flexibility in application which is allowed for by the policies, the sites should be able to be developed viably. No robust evidence has been put before me to contest delivery of the allocations.

144. The site capacities shown for the allocations are based on the best available evidence. The figures should not be seen as maxima. More detailed assessment at masterplan or application stage may justify a different number of homes being delivered.
145. Those residential (SA1) and mixed use (SA3) allocations proposing more than 50 dwellings have a requirement for masterplans with the objective of facilitating comprehensive and well-integrated development, sustainable and healthy communities, good design and ensuring that environmental matters are fully considered. Masterplans will also assist in the coordinated delivery of infrastructure. These principles are supported by the Framework.
146. Masterplans will be a particularly useful tool where there are multiple ownerships and/or a mixed-use development is proposed. The stage that a masterplan needs to be prepared and its level of detail will be influenced by a number of factors, including the scale and complexity of the development and whether the site or part of it has planning permission. Masterplans should be proportionate. Providing such an approach is followed, the masterplan requirement is reflective of a positively prepared and effective LP and should not materially delay delivery of sites. This is made clear by **MM47** to ensure effective policies. The Council published guidance on the preparation of masterplans following the hearings. It is not within the remit of this examination to consider whether the guidance reflects the expectation that masterplans should be proportionate. That said it is in the Council's interest to ensure that the masterplan process does not unduly delay delivery of allocations.
147. 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 in any event be subject to generic policies of the LP and would be picked up at application stage. That said whether this level of detail is included or not is a matter for the Council and does not go to soundness. In this respect I note that AMs address some of this detail.

Fleetwood, Thornton and Norcross

148. Much of Fleetwood lies within Flood Zones 2 and 3. Open land to the south of the town lies within the Green Belt. Taking into account the limited opportunities for development, it is inevitable that the allocations needed to provide housing will be in areas at risk of flooding. In this context the allocations at Broadway, Fleetwood Docks and Marina and the Port of Fleetwood are supported by Strategic Flood Risk Assessments (ED110, ED111a-i and ED112) and a Sequential Test Paper (ED113) which also addresses the exception test. As the sites are within the built-up area they

benefit from existing sea and river defences. The evidence base supports the allocations in accordance with Government policy.

149. Land at Broadway (SA1/1) is a former school playing field. However, the site has not been used as such for over 10 years and during that period has not been accessible to the public. Moreover, there is no overall deficiency in open space in Fleetwood. Taking into account the lack of deliverable land in the town, development for housing is acceptable. The KDC for the site need to be modified to reflect up-to-date flood risk and biodiversity information and deliverable sustainable transport infrastructure. **MM50** would achieve these changes so that the LP is positively prepared. The site is owned by LCC but, as it is surplus to requirements, there is an onus on disposal. Delivery within the next five years seems reasonable.
150. The allocation of the open fields to the east of Lambs Road, Thornton (SA1/2) will inevitably lead to a change in the character of the site on the settlement edge. However, the site does not have any significant landscape attributes. There is existing development to the north, south and west. Land to the east towards the Wyre Estuary is more sensitive and has more recreational value. The KDC relating to landscape and green infrastructure will assist in mitigating harm.
151. KDC 2 requires access via a new road from Skippool Road north of Thornton Mews. However, such a route may not be necessary as there may be scope to access the site safely from Lambs Road, notwithstanding the existing constraints of the B5412 between the site and Thornton Mews. Moreover, there are questions as to whether a significant section of new road on land in different ownership would be deliverable. In this respect the KDC should be modified to refer to the possibility of access from the existing road network. This would be achieved by **MM51** to ensure a justified and effective allocation.
152. KDC 6 requires land for a new primary school. However, there may be scope to expand existing schools, including Stanah Primary School adjacent to the site, so a new school may not be required. To recognise this **MM51** is proposed to cover the alternative scenarios and ensure a justified and effective allocation.
153. The KDC for the site need to be modified to reflect up-to-date flood risk, drainage and biodiversity information and deliverable sustainable transport infrastructure. **MM51** would achieve these changes so that the LP is positively prepared.
154. Although most of the allocation will not result in significant adverse impacts, the separate parcel of land to the south of Raikes Road has landscape and recreational attributes providing a green link between the built-up area of Thornton and the more extensive areas of countryside towards the Wyre Estuary and Skippool Creek. It has public footpaths along two boundaries. Access is via narrow lanes. This part of the allocation should be deleted. This would be secured by **MM51** which results in a reduced site area and site capacity (400 dwellings) and a positively prepared allocation. This parcel and the land to the east of the remaining allocation (SA1/2) would be designated

as GI through **MM18**. The change to the extent of the allocation and GI in the vicinity would require corresponding changes to the Policies Map.

155. Part of the site fronting Lambs Road already benefits from planning permission for 157 dwellings and an application for 66 dwellings is pending on the remainder of the frontage. Delivery of 360 dwellings within the LP period is realistic.
156. The allocation at Fleetwood Road North, Thornton (SA1/3) is well related to existing development to the west and the Hillhouse Technology EZ site across the road to the east. The site is owned by the Council and much of it is subject to a covenant that it be used as a cemetery, burial ground or crematorium. However, the IDP shows that there is sufficient cemetery capacity in the Borough for 17 years. Whilst capacity in Fleetwood is less at some 9 years, there is sufficient capacity at Poulton-le-Fylde Cemetery. In the circumstances the covenant is unlikely to be an overriding barrier to delivery of the site.
157. The KDCs for the site need to be modified to reflect up-to-date flood risk, drainage and biodiversity information and deliverable sustainable transport infrastructure. **MM52** would achieve these changes so that the LP is positively prepared. Delivery commencing in 2021/22 is realistic.
158. The Bourne Poacher, Thornton site (SA1/4) was under construction at 31 March 2018 so is deleted as an allocation but included within the supply as a commitment. **MM53** reflects this change in status so that the Plan is effective.
159. Most of the site to the north of Norcross Lane (SA1/11) has the benefit of an outline planning permission for mixed use development. As referred to earlier in relation to the Green Belt (paragraph 42), the allocation should be extended to reflect the planning permission. The KDCs for the site need to be modified to reflect up-to-date flood risk, drainage, access and biodiversity information and sustainable transport infrastructure. **MM60** would achieve these changes so that the LP is positively prepared. The site is expected to deliver 300 dwellings, all within the Plan period. The change to the extent of the allocation and Green Belt in the vicinity would require corresponding changes to the Policies Map.
160. Fleetwood Dock and Marina would contribute 120 dwellings as part of the mixed-use allocation (SA3/1). Delivery from 2022/23 would be realistic taking into account the complexities arising from the range of uses and different ownerships. The Hillhouse Technology EZ Site (SA4) is expected to contribute 250 dwellings all within the Plan period, delivery commencing in 2021/22. No evidence has been presented to dispute these figures.

Poulton-le-Fylde

161. Land to the south east of the town (SA1/5) has outline planning permission for 238 dwellings. The KDCs for the site need to be modified to reflect up-to-date flood risk, drainage and biodiversity information and delivery of sustainable transport infrastructure. **MM54** would achieve these changes so that the LP is positively prepared. Delivery of the entirety of the site within

the Plan period with commencement in 2022/23 is realistic given its planning status and attractiveness to the market.

162. The allocation at Garstang Road (SA1/6) has full planning permission and had commenced by the time of the hearings. Two housebuilder outlets are operating. Delivery of all 516 dwellings in the Plan period is realistic. The KDCs for the site need to be modified to reflect up-to-date flood risk, drainage and biodiversity information and delivery of sustainable transport infrastructure. **MM55** would achieve these changes so that the LP is positively prepared.
163. The Moorland Road site (SA1/7) was under construction at 31 March 2018 so is deleted as an allocation but included within the supply as a commitment. **MM56** reflects this change in status so that the Plan is effective.
164. Land to the south of Blackpool Road (SA1/8) extends to almost 20 ha but is only shown as delivering 154 dwellings. The matter of release from the Green Belt is dealt with under Issue 1. Whilst there are constraints affecting the site (highway, flood risk, railway line) and there is a need to provide land for a new primary school and a car park, the site is in an accessible location within walking distance of the town centre and railway station. There is scope to provide sustainable travel links across the site combined with GI which would make walking and cycling from the site and other areas to the north and west of the site more attractive.
165. A larger number of houses would allow a greater contribution to the Poulton-le-Fylde Highway Mitigation Strategy including off-site sustainable transport measures. The opportunity to make best use of the site should be taken and the numbers to be delivered should be increased. For the reasons given above and notwithstanding the highways constraint, the capacity of the allocation should be modified to 300 dwellings.
166. Alongside the increase in capacity, the KDCs for the site should be modified to reflect up-to-date drainage and biodiversity information, ensure that opportunities for sustainable transport modes are maximised and deliver highway mitigation. **MM57** would achieve the increase in capacity and KDC changes so that the LP is positively prepared, justified and effective. The site is one that would be attractive to the market and would be likely to be able to accommodate more than one outlet. Delivery of all of the 300 dwellings within the Plan period with commencement in 2021/22 is realistic.

Inskip

167. A significant allocation of 255 dwellings is proposed for the village of Inskip (SA1/13). There are a number of adverse impacts that would arise from this allocation. The northern part of the allocation would extend significantly into attractive open countryside. The level of housing would submerge the identity of the village and would not represent an organic extension. There would be a substantial detrimental impact on the character and appearance of the village and its countryside surroundings. There would be a significant loss of Grade 2 agricultural land. The village is relatively remote from many services and most sources of employment. Although there is a bus service, there would be an over-reliance on the private car for most trips which would

involve relatively long journeys along a network of rural B and C roads. As such the scale of development proposed would encourage commuting with implications for climate change.

168. Cumulatively these adverse impacts indicate to me that the scale of allocations would be too large and would outweigh the benefits. Indeed the 255 dwellings appear to derive principally from highway capacity considerations. In addition, I would question whether the site would deliver as anticipated given its fairly isolated location.
169. A modest scale of allocation would be justified to enhance and maintain the vitality of the village but this should be confined to the area which already has planning permission and the land allocated either side of the school. Such land would be well-related to the school and allow extension of the school if necessary. This would result in some 85 dwellings being earmarked for Inskip.
170. In my post hearing advice I suggested that the Council may wish to consider whether a modest allocation to the south of the village at Dead Dam Bridge would also be justified (Site INS_07). A Main Modification was proposed showing an allocation for 70 dwellings at this location. However, having carefully considered the representations on the MMs and taking into account my findings above, I do not regard a development of this scale in addition to the allocations elsewhere in the village to be modest. Moreover, part of the site lies within Flood Risk Zones 2 and 3. Although housing development could avoid these zones as indicated in the Flood Risk Sequential Test Paper (EL8.007), I do not consider that the sequential and exception tests have been passed. The limited sustainability benefits of the development do not outweigh the flood risk. This part of the allocation is not necessary to achieve a sound Plan.
171. The reduced size and capacity of the Inskip allocation would be secured by **MM62**. The change would be reflected in a corresponding modification to the Policies Map. As the majority of the remaining allocation has planning permission and development has commenced, a masterplan is no longer required to ensure an effective plan. Open space would be required as part of the housing development but it is unlikely that a meaningful village green could be delivered. The viability of providing a convenience store and enhanced community facilities may also be questionable given the reduced capacity of the allocation. I have modified the KDCs accordingly. The KDCs would also be modified to reflect up-to-date biodiversity information and realism about opportunities for sustainable transport modes (**MM62**). These modifications reflect a positively prepared LP.
172. Delivery of a smaller number of dwellings within the village is realistic. Given that 55 dwellings already have reserved matters approval and some initial works had started on site by the time of the hearings, commencement in 2018/19 is reasonable. Delivery of the whole of the allocation within the Plan period is reasonable. The removal of INS_07 from the allocation would not undermine the provision of a 5-year supply on adoption.

Great Eccleston and Over Wyre

173. The mixed-use allocation at Great Eccleston (SA3/3) would extend onto open fields to the west of the village either side of Copp Lane, some of which is Grade 2 agricultural land. A change in character would occur but the site does not have any significant landscape attributes. That part of the allocation to the south-east of the lane already has permission for predominantly housing and the area nearest the village is under-construction so change is already occurring.
174. The village, as a Rural Service Centre, has a good range of facilities, including two primary schools within walking distance of the site. The allocation seeks to enhance provision with the intention that the existing health centre within the village is to be relocated to the site and a new primary school, community hall and convenience store be provided. In addition, there would be 1 ha of employment land included. The proposal would create a good balance of uses and a sustainable extension to the village.
175. The KDCs seek to mitigate the impacts on character and appearance, the highway network and heritage assets. A new road linking Copp Lane with the A586 would enable traffic to avoid the tight and busy streets within the village centre. A buffer will be required around the Grade II listed dovecote at the eastern end of the site. Some modifications are necessary to the KDCs to reflect up-to-date information on biodiversity impacts and to ensure that pedestrian and cycle connectivity requirements are realistic. **MM82** would ensure a positively prepared LP.
176. Although the Housing Background Paper (ED010) refers to Great Eccleston being an untested market area, it is an attractive location and vibrant settlement. The site is capable of accommodating at least two outlets. The development company support a higher rate of delivery. Delivery should be increased to 50 dpa from at least 2025/26, leading to the whole of the allocation being delivered in the LP period (an additional 118 dwellings to that shown within the original housing trajectory). That said the total capacity of the site should be reduced from 590 to 568 to reflect a planning permission elsewhere in the village. **MM82** reflects these changes to capacity so that the LP is effective.
177. The allocation at Stalmine (SA1/9) is part of a larger triangle of land to the south of the village enclosed by the A588 to the east, Carr End Lane to the west and existing development to the north. The SHLAA does not identify any overriding constraints to the whole parcel coming forward albeit that the A588 junction with the A585 has limited capacity which leads to LCC recommending a cap on housing numbers in Over Wyre.
178. In terms of the configuration of the allocation there would appear to be logic to allocating STA_20 as an alternative to STA_16 at this point in time as it is physically better related to the village, there are no known constraints (other than the highways cap) and evidence indicates that it is deliverable (access via STA_05 and subject to a planning application). This would result in a modest increase in the capacity of the allocation from 162 to 180 dwellings.

179. The KDCs require amendment to reflect up-to-date information on biodiversity impacts, drainage and to ensure that pedestrian and cycle connectivity requirements are realistic. In addition, it is not certain that a new primary school will be required on the site as there is some capacity at the school in the village and at the primary academy in Hambleton with scope to extend the latter. Therefore, the relevant KDC needs to provide greater flexibility. **MM58** would secure these changes to ensure a positively prepared, justified and effective LP. The change to the configuration of the allocation would require a corresponding change to the Policies Map.
180. The north-east corner of the site has planning permission for 77 homes and is under construction. Delivery of the whole of the allocation within the Plan period is realistic.
181. Land to the north of Garstang Road, Pilling (SA1/10) has outline planning permission for 40 dwellings. Some modifications are necessary to the KDCs to reflect up-to-date information on biodiversity impacts and to ensure that pedestrian and cycle connectivity requirements are realistic. The site area and corresponding allocation boundary on the Policies Map require amendment to reflect the planning permission. **MM59** would ensure a positively prepared and effective LP. Delivery of the site within the next 5 years is realistic.
182. The allocation at Hambleton (SA1/12) has planning permission for 165 dwellings and is expected to be delivered in the Plan period. The KDCs require amendment to reflect up-to-date information on biodiversity impacts, drainage and to ensure that pedestrian and cycle connectivity requirements are realistic. **MM61** would ensure a positively prepared LP in this regard.

Forton and Hollins Lane

183. The mixed-use allocation at Forton (SA3/4) proposes 468 dwellings and 1 ha of employment land on an overall site of almost 30 ha. The intention is that the allocation would also deliver a convenience store, community hall and health facility, the latter if required.
184. The decision to make large scale allocations at Forton appear to derive principally from highway capacity considerations elsewhere. As previously explained the parcels of land to the south and east of Sunnybank Nurseries significantly erode the gap between the settlements of Forton and Hollins Lane and undermine the strategic area of separation. Moreover, development on these sites would be poorly related to the existing settlement structure and could not form an 'organic extension' to Forton, appearing as satellite housing estates. In addition, these parcels would be some distance from the hub of services in Forton (primary school, village hall, open space/recreational facilities and potential convenience store).
185. Those parts of the allocation wrapping around the southern and eastern sides of the existing village would also have landscape impacts. However, they would be capable of being designed as 'organic extensions', would provide scope for an extension of the primary school and would be closer to, and be able to consolidate, existing village facilities.

186. In conclusion the allocation at Forton should be amended to delete the parcels to the south and east of Sunnybank Nurseries. This would result in a site area of 19.5 ha with a capacity for 310 dwellings. This quantum of development should still be able to deliver the other components of the mixed-use development so that the expansion of the village creates a sustainable community.
187. The KDCs seek to deliver a well-planned village extension. That relating to the masterplan should ensure that access to the various parcels is unfettered in view of the particular configuration of the allocation and the different ownerships involved. Other KDCs require amendment to reflect up-to-date information on drainage, to ensure that pedestrian and cycle connectivity requirements are realistic and to recognise that a landscape buffer should be provided along the A6 to soften the edge of the development and safeguard living conditions.
188. The Council's revised trajectory, supported by the promoter of a significant parcel of land within the allocation, indicates that the entirety of the housing could be delivered in the LP period based on realistic delivery of a maximum of 40 dpa, probably with two outlets.
189. The changes to the allocation and KDCs would be secured by **MM83**. There would also be corresponding changes to the Policies Map. These changes are required to ensure a positively prepared, justified and effective allocation.
190. The two sites allocated at Hollins Lane (SA1/14 and SA1/15) have planning permission and are expected to deliver 89 dwellings in the Plan period. The KDCs require amendment to reflect up-to-date information on drainage and to ensure that pedestrian and cycle connectivity requirements are realistic. **MM63** and **MM64** are necessary so that the LP is positively prepared.

Garstang, Bowgreave, Catterall and Barton

191. Most of the housing allocations along the A6 corridor have already obtained planning permission. The housing capacities of the sites at Kepple Lane, Garstang (SA1/18), Bowgreave House (SA1/19), south of Calder House Lane, Bowgreave (SA1/21) and Daniel Fold Farm, Catterall (SA1/23) require amending to reflect these permissions. Sites at Garstang Road, Bowgreave (SA1/20), Garstang Country Hotel, Bowgreave (SA1/22) and Daniel Fold Farm Phase 2 (SA1/24) also have permission as do the three allocations in Barton (SA1/25, SA1/26 and SA1/27). The area is attractive to the market and delivery of all these sites is expected to take place during the Plan period with many of the dwellings being built in the next 5 years.
192. The mixed-use sites at Joe Lane, Catterall (SA3/2) and west of the A6, Garstang (SA3/5) also have planning permissions with the former under construction. The allocation boundary on the Policies Map for Joe Lane requires slight adjustment to reflect the permission so that the allocation is effective. Again delivery of all of the houses is anticipated to be within the LP period.
193. The KDCs for the above housing and mixed-use allocations require amendment to take into account up-to-date information and evidence on sustainable transport, flood risk, drainage and landscape and to ensure that

pedestrian and cycle connectivity requirements are realistic. The modifications to site capacity and KDCs to ensure a positively prepared and effective LP would be secured by **MM67-76**, **MM81** and **MM84**.

194. The housing allocation west of Cockerham Road, Garstang (SA1/16) covers only a portion of the triangle of land between the B5272, Croston Barn Lane and Nateby Crossing Lane. Additional land to the west of the allocation is well-contained and does not have significant landscape attributes. Moreover, the extent of the allocation is not consistent in spatial terms with the approach to the mixed-use allocation to the south of Croston Barn Lane (SA3/5) which also extends the built-up area of Garstang westwards and which covers the entire triangle of land bounded by three roads.
195. The development may need to deliver a primary school. In this respect it is questionable whether sufficient land has been allocated to allow delivery of the school and 100 dwellings. Moreover, for the reasons given under Issues 1 and 2 and based on highways evidence, there is scope for a modest increase in housing delivered in Garstang. The technical constraints identified in the SHLAA (access, electricity lines, public right of way) can be overcome by master planning. The allocation should be extended so that it has an overall capacity of 260 dwellings.
196. It is not certain that a new primary school will be required in Garstang as there may be capacity in, or scope for the extension of, existing schools. In this respect the KDC should be amended to be more flexible. Additionally other KDCs need to be updated to reflect up-to-date information on sustainable transport and to ensure that pedestrian and cycle connectivity requirements are realistic.
197. Questions have been raised about delivery but the larger site is being promoted by a national housebuilder and Garstang is attractive to the market. The site should be built out within the Plan period with a realistic start date of 2021/22.
198. The changes to the allocation and KDC would be secured by **MM65**. There would also be corresponding changes to the Policies Map. These changes are required to ensure a positively prepared, justified and effective allocation.
199. The remaining allocation within this area is land to the south of Prospect Farm, Garstang (SA1/17). The capacity of the site has been limited by the highways cap (53 dwellings). However, for the reasons given above and based on the existing highways evidence specific to the site there is scope for an increase in the capacity to 70 dwellings. Additionally the KDCs need to be updated to reflect up-to-date information on sustainable transport and to ensure that pedestrian and cycle connectivity requirements are realistic. These changes would be secured by **MM66** to ensure a positively prepared and effective LP. Delivery within the Plan period but with a start date beyond the five years is realistic.

Conclusions on Issue 7

200. The modifications referred to above relating to the capacity and scale of allocations and delivery rates affect some of the overall figures so result in

consequential changes to the LP through **MM3-MM5, MM21-MM23, MM48-49** and **MM79** which are required so that the Plan is effective.

201. I conclude that, subject to the MMs proposed, the allocations will come close to delivering the housing needed over the Plan period in a manner which is consistent with other policies of the Plan and the NPPF and that necessary infrastructure within and close to sites will be provided alongside the homes. The adverse impacts of the allocations as modified would not significantly and demonstrably outweigh the benefits.

Issue 8 - Whether necessary District wide infrastructure is likely to be delivered alongside development

202. Essential infrastructure will need to be delivered alongside the development proposed within the LP in a timely fashion. The delivery of highway and transport improvements is particularly critical given the constraints of the existing network.

203. Some key highway schemes are already committed. Improvements to Junctions 1 and 3 of the M55 will increase capacity and reduce congestion. A scheme to by-pass the Little Singleton pinch point on the A585 is being progressed by Highways England. Other more localised improvements along the A585 and A6 are also intended. A new M55 Junction 2 linked to a western by-pass for Preston will also have capacity and congestion benefits, albeit that it is not necessary to support development in Wyre. The IDP reflects those schemes which are Wyre related.

204. LCC has also developed Mitigation Strategies for Poulton-le-Fylde and the A6 corridor which are appended to the LP. The Strategies include measures to increase the capacity and reduce congestion at certain junctions and support sustainable transport improvements. Development within these areas will be expected to contribute to the measures. The Strategies are likely to evolve during the lifetime of the LP and this is recognised by **MM92** and **MM93** to ensure that the LP is effective.

205. Alongside the highway network improvements the LP should maximise opportunities for new development that is close to facilities, offers a choice of transport modes and can contribute to improvements in walking, cycling and public transport. The IDP includes improvements to the rail, tram, bus and cycling network. My recommendations under Issue 7 relating to existing allocations seek to achieve additional development in sustainable locations within the limitations of the existing evidence base. The proposed new review policy (**MM90**) will consolidate this approach.

206. The LP includes proposals for some new primary schools and extensions to existing schools which are reflected in the IDP. New or expanded healthcare facilities are or may be required in Great Eccleston, Forton, Thornton, Poulton and Garstang which are also referred to in the IDP. Other essential infrastructure, including that related to flood risk and community facilities, is also detailed within the IDP.

207. The IDP has been amended during the examination to reflect MMs to the LP; sources of funding; the lead organisation; and to make it clear whether the infrastructure is critical to the delivery of the Plan (EL8.004). In order to

emphasise the key role of the IDP and that it is a living document, a new section is to be added to the LP Monitoring Section. This would be secured by **MM89** which is needed for the Plan to be positively prepared and effective.

208. The IDP has highlighted a sizeable funding gap in order to deliver the necessary infrastructure taking into account committed monies. However, as much of the infrastructure need arises from the growth proposed in the LP such as additional school places and transport improvements, developer contributions will be a significant source of funding to bridge the gap. In addition, grants and infrastructure funds such as the Growth Deal are highlighted by the IDP and will be exploited where possible to fund infrastructure.
209. Policy SP7 supports the delivery of infrastructure and the requirement for developer contributions. Delivery of the infrastructure by developers on or near the site is often preferable than provision of contributions. But delivery by developers will need to be agreed with the infrastructure provider. To make Policy SP7 effective and clear to the decision maker in these respects **MM12** is required.
210. The Council is exploring the possibility of introducing a Community Infrastructure Levy (CIL) Charging Scheme but is awaiting the outcome of this examination process and the Government's review of CIL before progressing further.
211. The LP through Policy SP6 recognises that infrastructure contributions can make development unviable and there may be circumstances where a reduction in requirements may be contemplated. However, certain infrastructure improvements are critical and without which development would have clear unacceptable impacts, for example in relation to highway safety. **MM11** is needed to make this clear in the interests of a positively prepared LP.
212. New residential development needs to be accompanied by open space and other GI to ensure the health and well-being of new communities and well-designed neighbourhoods. The particular type of GI that should be provided will depend on what is available locally and if there are deficiencies in a particular typology. As currently worded Policy HP9 does not allow this degree of flexibility. **MM33** and **MM34** recognise that GI should be considered on a case by case basis taking into account a number of relevant factors so that Policy HP9 is positively prepared.
213. Policy HP9 expects that all new housing should make provision for open space. However, such a requirement would not accord with the advice in the PPG about tariff-style contributions. **MM34** applies the 11 dwellings or above threshold to be consistent with national policy.
214. **MM91** amends monitoring indicators so that they are measurable and effective against the provisions of Policy HP9.

Conclusions on Issue 8

215. I conclude that, subject to the MMs proposed, the necessary District wide infrastructure is likely to be delivered alongside development.

Public Sector Equality Duty

216. In arriving at my conclusions on the above issues I have had regard to the Public Sector Equality Duty contained in the Equality Act 2010 and the Council's Equality Impact Assessment (ED007) and its Addendum (EL8.006). In particular in relation to the protected characteristics of older people, those with disabilities and gypsies and travellers, the housing policies considered under Issue 4 will have a positive equality impact.

Assessment of Legal Compliance

217. My examination of the legal compliance of the Plan is summarised below.

218. The Local Plan has been prepared broadly in accordance with the Council's Local Development Scheme 2017 (ED005).

219. Consultation on the Local Plan and the MMs was carried out in compliance with the spirit of the Council's SCI as explained earlier in this report.

220. SA has been carried out and is adequate. The SA of August 2017 considered alternative strategies. The addendum to the SA considered the MMs, including the higher housing requirement, and concluded that there were no significant implications for the earlier SA.

221. The Habitats Regulations Assessment Report of September 2017 (SD006) explains that the LP will not have any adverse effects on the integrity of the European sites identified within the Report, either alone or in combination with other plans or projects. The updated report of August 2018 (EL8.003) took into account the Court of Justice of the European Union judgement² and the MMs to the LP and came to the same conclusions as the original report. Natural England agreed with the conclusions of the reports.

222. The LP includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Policies SP2 and CDMP3 are subject to MMs so that they make reference to the use of design and energy efficiency in responding to climate change.

223. The LP complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

² People over Wind & Sweetman v Coillte Teoranta Case C-323/17

Overall Conclusion and Recommendation

224. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

225. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended MMs set out in the Appendix, the Wyre Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Mark Dakeyne

INSPECTOR

This report is accompanied by an Appendix containing the Main Modifications.