



Wyre Council

Wyre Local Plan Full Review

Summary of Responses to the Regulation 18 Scoping Consultation

July 2022

Contents

1. Introduction	2
2. Consultation Process	2
3. Summary of Main matters raised	2
Appendix A – Scoping Consultation Letter	4
Appendix B – Summary Table of Consultation Responses	7
Appendix C – Original Consultation Responses	18

1. Introduction

- 1.1 The Wyre Local Plan 2011 – 2031 (WLP31) was adopted on the 28 February 2019 and contained within it Policy LPR1. Policy LPR1 required the early partial review of the WLP31 with the objective of meeting the full objectively assessed housing needs over the plan period.
- 1.2 As some additional matters fall outside the scope of the partial review, the council has taken the decision to commence a full review of the Wyre Local Plan (2011-2031). The first stage of preparing the full review is to ask the community and other stakeholders to identify issues that the new local plan should address and to identify the evidence required to support the plan's preparation. This is called "scoping".
- 1.3 At the scoping stage, the council has not predetermined the issues to be considered nor the evidence base that will be required to support the full review.
- 1.4 This document sets out a summary of the consultation undertaken and a summary of the main issues raised.

2. Consultation Process

- 2.1 The consultation was launched on 27 January 2022 and ran for a six week period until 5.00pm on 10 March 2022. The council contacted all consultees held on the Register of Consultees database, which contained 535 in total (523 consultees contacted via email notification and 12 via letter). A copy of the letter is available in appendix A. In addition, the letter was posted on the council's website and advertised via the corporate e-news.
- 2.2 Responses were invited either by email (planning.policy@wyre.gov.uk) or by post to Planning Policy, Civic Centre, Breck Road, Poulton le Fylde, FY6 7PU. It was made clear to all respondents that all comments will be published, and apart from the name of the sender no other personal information will be publicly available. Any anonymous comments would not be accepted.

3. Summary of main matters raised

- 3.1 In total 33 responses were received, all by email.
- 3.2 The following key themes were suggested to be included within the scope:
 - Housing;
 - Employment;
 - Leisure and tourism;
 - Infrastructure including health, education and highways & transport;
 - Climate change and renewable energy;
 - Flood risk including drainage and water management;
 - Environmental constraints including peat;
 - Green Infrastructure;

- Biodiversity and biodiversity net gain;
- Design;
- Heritage and culture;
- Green belt;
- Health and wellbeing;
- Brownfield redevelopment/safeguard green field sites; and
- Fleetwood and the role of Fleetwood Port.

3.3 The following evidence base documents were identified as being necessary:

- Housing and affordable housing evidence;
- Evidence and viability assessment to support optional housing standards – access, adaptable homes, water and space standards;
- Highway evidence and modelling to consider the strategic road network including the operation of existing junctions and new road infrastructure, growth capacity and air quality;
- Sustainable transport including existing and future rail capacity, enhancements and wider sustainable transport improvements;
- New or updated Strategic Flood Risk Assessment;
- Open Space Audit, including Playing Pitch Strategy and Built Facilities Strategy;
- Greenbelt assessment; and
- Viability assessment.

3.4 A summary of the points raised by each respondent is set out in the table below (appendix B). All responses received have been read in full and will be fully taken into account for setting the scope of the partial review of the WLP31. A copy of the full responses are available in appendix C.

Appendix A – Scoping Consultation Letter

Ask for: Steve Smith
Email: planning.policy@wyre.gov.uk
Tel No: 01253 891000
Our Ref: LPFR Scoping

Date 26 January 2022

Dear Sir/Madam,

Public Consultation. Regulation 18 and Call for Sites 2022

The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 (as amended)

Wyre Local Plan Full Review Scoping Consultation and Call for Sites

I am writing to advise you of the council's decision to commence a full review of the Wyre Local Plan (2011-2031). The council is now consulting on the scope of the full review and undertaking a call for sites exercise for six weeks from 27 January to 5.00 pm on 10 March 2022.

Background

The Wyre Local Plan (2011-2031) was adopted on 28 February 2019 and contains policy LPR1. This policy requires the early partial review of the Local Plan with the objective of meeting the full objectively assessed housing need over the plan period (2011-2031). In considering views received, alongside subsequent evidence and supporting documents, the council has prepared and recently consulted on the Publication draft Wyre Local Plan Partial Review (2011-2031). The council are currently considering representations received and intend to formally submit the Local Plan Partial Review for examination to the Secretary of State in April 2022.

The council has taken the decision to commence a full review of the Wyre Local Plan (2011-2031) as some additional matters fall outside the scope of the partial review. The full review will run alongside the partial review currently underway.

The Local Development Scheme is available on the council's website (<https://www.wyre.gov.uk/local-plan/local-development-scheme/1>) which sets out the timetable for the partial and full review.

Scoping Consultation

The new Local Plan Full Review will set out planning policies that will guide the future pattern of development and investment in the borough for the next 15 to 20 years.

The first stage of preparing the full review is to ask the community and other stakeholders to identify issues that the new local plan should address and to identify the evidence required to support the plan's preparation. This is called "scoping".

At this stage, the council has not predetermined the issues to be considered nor the evidence base that will be required to support the full review. We welcome your views both on the scope of the full review and the evidence base required to support it.

However, since the current local plan was adopted in 2019, the council has declared a climate emergency. Mitigating the impact of and adapting to climate change will be a key issue for consideration in developing the new local plan.

In addition, the new local plan will need to respond to revisions to the Use Classes Order that came into effect on 1 September 2020.

Comments on the scope of the full review should be made in writing via email or letter (details below).

Call for Sites

The council is also seeking to know of any sites, land or buildings in Wyre that could have potential for future development, redevelopment or designation for:

- Housing;
- Employment and employment generating developments;
- Retail, leisure and commercial uses;
- Gypsies and Travellers & Travelling Showpeople;
- Renewable, community and low carbon energy;
- Nature recovery/ biodiversity net gain; and
- Natural flood management.

The council will assess all submissions and consider what sites could be suitable for development or designation, if required. The council may only be able to take account of sites at particular stages of preparing the plan if the emerging evidence indicates there is a need for that potential use or designation. The purpose of this stage is to identify all potential sites that are available.

If you wish to submit any sites for consideration, please complete the Call for Sites Response Form and send it with a plan clearly showing the location of the site. A Call for Sites Guidance Note is also available.

In due course, submitted sites may be formally allocated or designated in the new Local Plan. Until such a time as any site is formally allocated or designated, any submissions will have **no weight** as a material planning consideration in the determination of planning applications.

The Call for Sites Response Form and Guidance Note can be downloaded from www.wyre.gov.uk/localplanreview or you can collect a hard copy from Civic Centre, Poulton-le-Fylde, FY6 7PU.

How to respond to the scoping consultation and call for sites

Comments on the scoping consultation and the submission of Call for Sites Response Forms should be made by email or post to:

- Email: planning.policy@wyre.gov.uk
- Post: Planning Policy, Civic Centre, Breck Road, Poulton-le-Fylde, FY6 7PU

Responses should be received by the **deadline of 5.00pm on 10 March 2022**. Responses received after this deadline will not be considered.

Next steps and Data Protection

The council is obliged to make all submissions available to the public as it will form part of the evidence base for the Local Plan Full Review. All comments on the scoping consultation and sites submitted as part of the Call for Sites will be published in due course. The name of the sender and organisation (if relevant) will be published, no other personal information will be published. Anonymous responses will not be accepted.

Further information about Data Protection and the council's policy can be viewed on the council's website at <https://www.wyre.gov.uk/service-area-privacy-notices/privacy-notice> and at <https://www.wyre.gov.uk/downloads/file/203/privacy-notice-planning-services>

Further information

If you have any queries, please contact the planning policy team on email: planning.policy@wyre.gov.uk or telephone: 01253 887235/7302.

You are receiving this letter because your contact details are held on our Local Plan consultation database. If you no longer wish to be consulted on planning policy matters and/or the contact details are incorrect, please let us know either by phone 01253 887302 or email planning.policy@wyre.gov.uk

Yours faithfully,

Steve Smith
Economic Development & Planning Policy Manager.

Appendix B – Summary Table of Consultation Responses

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
0001	Thea (Resident)	<ul style="list-style-type: none"> No need for more houses. No more fields should be lost through ugly housing; many unsold; most do not meet affordable housing definitions; not in-keeping with the area (materials and style); and most within floodplains. No infrastructure, jobs or activities for new residents. This creates congestion to Preston and Lancaster; highway safety concerns on new estate roads. No greenery left. Wyre is just being destroyed for greedy selfish people who will have nothing personally to do with the area! 	n/a	Noted. Consideration of housing and infrastructure including transport & highways will be within the scope of the full review.
0002	Network Rail	n/a	<ul style="list-style-type: none"> Existing and future railway capacity (for both passengers and freight). Any potential operational railway enhancements. Adequate facilities to promote the use of rail freight as an alternative to road based transport. Enhanced facilities and improvements to stations, including opportunities to create new homes, better public space, enhanced connectivity and accessibility. Level crossing safety and closure where new development changes risk. Consideration of development sites that are surplus to operational requirements (pending full consultation with Network Rail). 	Consideration of transport and highways will be within the scope of the full review.
0003	Coal Authority	<ul style="list-style-type: none"> Wyre lies outside the defined coalfields. The Coal Authority has no specific comments to make on the Local Plan. Not necessary to consult the Coal authority with future drafts or updates to the emerging Plan. 	n/a	Noted.
0004	David Fisher (Resident)	<ul style="list-style-type: none"> Housing developments all contain large houses or upmarket bungalows. Some villages are doubling in size. Not type of housing required. Poor infrastructure and services, badly served with meaningful jobs. Should only authorise genuine affordable houses to buy or rent, such as a council houses. 	n/a	Noted. Consideration of housing, employment and infrastructure will be within the scope of the full review.
0005	David Wilson (Resident)	<ul style="list-style-type: none"> Improve the roads and the schools, safeguard shops before build new homes. Do not build on green fields and improve drainage systems. Improve bus services Loss of large trees around Thornton should not have been allowed. 	n/a	Noted. Consideration of housing, infrastructure and transport & highways will be within the scope of the full review.
0006	Margaret Hodge (Resident)	<ul style="list-style-type: none"> Holts lane fields could be used as a flood plain. Surprised to hear that peat was removed from the site – understood in terms of biodiversity and climate change it was vital to leave it in the ground. 	n/a	Noted. Consideration of flood risk and climate change will be within the scope of the full review.
0007	Michael Burke (Resident)	<ul style="list-style-type: none"> Fleetwood has seen the decline in the fishing industry, the port and deprivation has taken root. Fleetwood's assets are the seaside location and a tidal estuary, the plan put forward is not ambitious enough to increase productivity, attract large manufacturing and improve the GDP and hence living standards for the Town. Above all provide the youngsters with ambition. A makeover of 	n/a	Noted. Consideration of Fleetwood and the Port will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<p>the museum and market will not benefit the population.</p> <ul style="list-style-type: none"> • Great scepticism of the fish park - the fishing industry no longer exists, the port is silting up and needs considerable investment. It is barely functional for leisure craft. • The port could have been the “Jewel in the Crown” for the whole of the Fylde coast and in particular Fleetwood. It needs much greater ambition! 		
0008	National Highways	<ul style="list-style-type: none"> • Government policy sets out in the Road Investment Strategy (2020-2025) seeks de-trunking of the A585 following completion of the A585 Windy Harbour to Skippool Bypass scheme. • Refers to The Strategic Road Network Planning for the Future - A guide to working with National Highways on planning matters (2015). • Local Plan provides opportunity to align sustainable transport modes rather than reliance on road network where scope of future improvements are limited. Measures to encourage greater use of sustainable modes and support new public transport infrastructure should be within scope. De-trunking A585 could help with reopening rail line to Fleetwood. • Where infrastructure improvements are needed that are not already included within the committed programme, council should lead in identifying and promoting those solutions for delivery at the appropriate time within the lifetime of the Plan in consultation with the providers concerned. • The evidence for the adopted Local Plan identified more significant improvements of M55 junction 3 would be required for traffic impacts of growth in both Wyre and Fylde from late 2020s. There is no certainty that such schemes will be funded for delivery from National Highways forward programme. • A585 to jct 3 M55 (outside borough) does not meet modern standards - safety/operational concerns. • A6 corridor to M55 jct 1 current congestion and queuing on westbound jct 1 - safety/operational concerns. • Dedicated lorry parking sites within the area in close proximity to strategic road network 	<ul style="list-style-type: none"> • Emerging Local Plan transport evidence base should include appropriate traffic modelling of the Strategic Road Network and its junctions that reflects how traffic interacts across area as a whole, which includes those important junction for access to the Borough that are located outside its administrative boundaries; namely M55 Junctions 1 and 3 and M6 Junction 33. National Highways supports the preparation of a transport evidence base within a timeframe that allows for the opening to traffic of the A585 Windy Harbour to Skippool Bypass (expected autumn 2023) so that the impacts of this improvement on the operation of the highway network can be properly accounted for. • Consideration of transport growth and impacts on air quality. • Transport evidence should consider all modes of transport for potential infrastructure improvement solutions (not just highways). • Clear understanding of what development can take place using existing transport capacity, at what time transport interventions are required and how they will be funded. • Transport evidence should be led by Wyre Council and developed in full accordance with current planning policy and guidance. National highways would welcome opportunity to engage with the council to discuss the intended approach to preparing this assessment and how we may assist in the provision of information and support. 	Noted. Consideration of transport and highways will be within the scope of the full review.
0009	Robert Cooke (Resident)	<ul style="list-style-type: none"> • Brownfield sites: Twenty-two in the borough, but only two under active consideration for development. Brownfield sites should be the only sites developed. Green areas of the borough have been damaged enough. • Nature recovery and biodiversity: We have wonderful natural areas in the borough, if these green areas are lost they cannot be re-created. • Housing: The Environment Agency calculates that 28,500 homes in Wyre could flood, yet more houses are being given planning permission on flood plain areas; ground instability issues; as housing density increases so does CO2 emissions; highway congestion increase emissions; green areas can absorb carbon but being concreted over; infrastructure inadequate for rising population e.g. schools and doctors. • Employment: the borough is becoming a dormitory area, which puts more strain on transport. Area traditionally farming (and at one time fishing), also many skilled craftsmen. Higher paid jobs, such as those in heavy industry do not exist and would be inappropriate. 	n/a	Noted. Consideration of housing (including brownfield sites), biodiversity, employment and infrastructure will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
0010	Inskip Parish Council	<ul style="list-style-type: none"> ● Further expansion of the Inskip settlement is not sustainable. An extract of Inspectors Final Report is provided. ● In 2016 the core settlement at Inskip consisted of 236 dwellings. Since then Wyre Council have permitted three housing developments totalling 27+55+30=112 additional dwellings. Though this increase is significantly less than Wyre's original plans for an Inskip Extension it still represents an almost 50% increase in the size of the community. In line with the Inspectors finding the Parish Council recommends and urges Wyre Planners to protect Inskip from the "benefits" of any further development at this time and to include no further housing allocations at Inskip in their plans. 	n/a	Noted.
0011	Blackpool Council	No comment. Look forward to working with Wyre Council through the Fylde Coast Duty to Cooperate.	n/a	Noted.
0012	Wyre Labour Group	<ul style="list-style-type: none"> ● Re-evaluate vision to include: <ul style="list-style-type: none"> > tackling climate change; providing road map on how council and borough will reach net zero; and vision for local area energy plans integrated within Local Development Plan. > under provision of employment opportunities: must be vision to improve local job opportunities and drive down commuting distance and out commuting; essential for economy and reducing carbon emissions > transport system not fit for purpose; must refer to reopening Poulton to Fleetwood rail line being essential not aspiration, with solution for line to reach town centre to aid economic regeneration; improved connectivity between Fleetwood, Thornton Cleveleys and Poulton via sustainable and active forms of travel, shifting away from car to walking, cycling and public transport. > under provision of formal and informal public open space in every town: protect and promote new. > low wage economy: vision must improve levels and pay living wage or more across borough; higher wage economy will reduce commuting and reduce carbon emissions ● Housing location <ul style="list-style-type: none"> > review existing allocation (and new) considering climate change; local area energy plans and whether can deliver net zero; current and future flood risk; > population density by area/town; current open space provision in area/town and impact on that provision > long term development limits for each settlement required - there must be limit to development in urban areas, this limit already passed in urban west; separation between urban settlements already closing; > local employment and infrastructure provision (current and future transport connectivity; doctor and dentist, public open space; schools) ● Fleetwood Port reconsidered for housing, should be tidal barrage / wind farm to grow green economy in 10% most deprived wards ● Housing mix - strengthen policy on small properties to be demand not supply led; discourage HMOs; encourage independent living in own homes rather than care homes ● Housing design - highest standards of insulation (Future Homes Standard), set local energy efficiency standards for new 	Up to date open space audit required to inform decision making.	Noted. Consideration of climate change and renewable, transport and highways, employment, Green infrastructure, housing, tourism and design will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<p>home; do not allow new homes that will need future retrofitting; renovated homes via Planning system should be inline with highest insulation standards; plan for all housing stick to be insulated to high standard within local area energy plans</p> <ul style="list-style-type: none"> • Renewable energy - new estates to be net zero, no gas/fossil fuel heating; air quality neutral; each property have own solar / heat pump for their needs or part of community project; maximise renewable energy within site layout, POS, design, roof orientation etc • EV Charging - required for every property, or access to for apartments/flats with standard per number of apartments/flats; consider how can provide EV chargers close to property where household do not have access to off-street chargers; policy for smart electric charging where renewables permit • Transport and Tourism Strategy for Wyre should be integrated and aligned with Local Plan; policy for unregulated Airbnbs • Climate Change should be integrated in all policies, impact should be first consideration; support retrofitting housing stock; peat bogs protected, tree planting to align flood prevention; tree planting onsite should be preference or off site funding; land set aside for rewilding; EV charging points for non-domestic premises provided. 		
0013	Theatre Trust	<p>Include policy to support districts valued cultural facilities include Marine Hall and Thornton Little Theatre and protect them from loss or harm from insensitive nearby developments to ensure consistent with NPPF paragraph 93 and 187.</p>	n/a	Noted. Consideration of heritage and culture will be within the scope of the full review.
0014	Home Builders Federation	<ul style="list-style-type: none"> • Extending the Plan period to cover 15 years from adoption will likely mean a Plan period up to 2040. Much of existing evidence will need updating. • Whilst partial review is considering housing requirement, it is likely that this will need further consideration as part of any Plan review, particularly in relation to any increase in Plan period and giving consideration to the development strategy. • Will need to assess housing land supply and other circumstances that may lead to the need to remove land from the Green Belt. Likely need to update their Green Belt Review to assess parcels of land against purposes of the Green Belt to determine if they are appropriate to be removed from the Green Belt designation. • Affordable Homes policy needs to be updated in relation to First Homes and Affordable Home ownership. • Housing supply should include short and long term supply of sites both strategic and non strategic to provide choice. Atleast 10% of sites should not be larger than 1ha. Should provide flexibility in supply above minimum housing requirement. 	<ul style="list-style-type: none"> • Policy requirement should be informed by evidence of Need • Green Belt Assessment • Optional Housing Standards (access & adaptable homes, water and space standards) - evidence of need and viability • Affordable Housing Assessment • Viability Assessment 	Noted. Consideration of housing, green belt and viability will be within the scope of the full review.
0015	Cabus Parish Council	<ul style="list-style-type: none"> • Do not wish to see further sites identified for development within Cabus beyond those already included in the adopted Local Plan. • Wyre Council declared a climate emergency since Local Plan adopted. Cabus Parish also declared a climate emergency and fully endorse the need for the current and subsequent local plans to actively include measures to mitigate the impact of climate change. 	n/a	Noted. Consideration of climate change will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<ul style="list-style-type: none"> • A range of suggested planning conditions to adapt/mitigate climate change suggested. 		
0016	Canal and River Trust	<ul style="list-style-type: none"> • The Trust manages Lancaster Canal through the borough. It is an important multi-functional asset: provides green and blue space, can utilise for social, economic and environmental wellbeing of residents. Local Plan should consider policy context to support health and wellbeing. Maximise access to waterways. • Where development would lead to an increase usage of these assets, infrastructure improvements should be provided of adequate wayfinding to maximise the asset. • Local Plan has a key role in mitigating and adapting to climate change. Waterways can assist, examples include heating and cooling systems, sustainable travel. Lancaster Canal has opportunities for sustainable leisure, recreational and tourism while preserving and increasing levels of biodiversity, water management. • Canal is a heritage asset and supports other designated and non-designated assets along it. • Council should consider whether a stand alone policy (in addition to CDMP3) for the canal and/or blue infrastructure could assist in securing key objectives. 	<ul style="list-style-type: none"> • Up to date evidence on housing need. 	Noted. Consideration of climate change, design, housing, heritage and green/blue infrastructure will be within the scope of the full review.
0017	Story Homes co Barton Willmore	<ul style="list-style-type: none"> • Council should focus its efforts on undertaking a full review (not partial alongside) and have an aspirational housing strategy. • Concerned council reducing its requirement via Standard Method. No evidence to support this strategy. Would constraint economy as less economically active people to meet job growth in the borough. Full review needs this evidence. Should also include an OAN review so economic growth and affordability considered. Strong need for affordable housing, unmet need. • Should continue with pro housing and job growth strategy. To do this, need to allocate sites. • Housing delivery is in excess of requirement demonstrating strong delivery. Large number of allocated sites benefit from planning permission and important identify new housing allocations to replace existing allocated sites. 	<ul style="list-style-type: none"> • Up to date housing evidence and OAN assessment. 	Noted. Consideration of housing and employment will be within the scope of the full review.
0018	Karlin Fleetwood Ltd co WSP	<ul style="list-style-type: none"> • In relation to Affinity Lancashire and retail demand, a shift towards more experiential destination together with leisure pursuits. Site should have sufficient flexibility for retail, leisure and tourism 	n/a	Noted. The site will be considered as part of the call for sites process.
0019	Gladman Developments	<ul style="list-style-type: none"> • Should use the Full Review to undertake a comprehensive assessment of the strategic housing needs of the borough including implications of the market signals, economic and employment growth and an affordability analysis. Standard method is the minimum need and should positively plan to align with national ambition to boost the supply. • Strategic cross boundary matters are particularly pertinent for Wyre full Review due to previous request for assistance. Important evidence is transparent. 	<ul style="list-style-type: none"> • Up to date housing evidence 	Noted. Consideration of housing and employment will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
0020	Lead Local Flood Authority	<ul style="list-style-type: none"> • Clear policies on flood risk and surface water issues needed. • Revise wording to Blue-Green infrastructure. Natural Flood Management a new requirement to consider, seek advice from Environment Agency. • Consider specifying land to be safeguarded for current or future flood risk management • Should refer to treatment trains, BNG and blue-green infrastructure. This would promote SuDS • Should specify requirement for urban creep and climate change. • Include requirement for free-running watercourses to be provided for all developments that seek to discharge surface water into watercourse. If not possible, required to provide specified allowance for surcharge outfall over calculate discharge rate for each site. • Requirement for 8 m easement near bank of watercourse • Requirement to avoid and minimise culverting watercourses wherever possible and promote daylighting of culverts where possible. • Comments provided on revising working for existing policy CDMP2 and CDMP4 	n/a	Noted. Consideration of flooding, green/blue infrastructure, biodiversity net gain and climate change will be within the scope of the full review.
0021	Homes England	No representations on this consultation.	n/a	Noted.
0022	Sport England	<ul style="list-style-type: none"> • Positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Should reflect and comply with national planning policy for sport as set out in the NPPF with particular reference to paragraphs 98 and 99. • Consideration is given as to the location of existing and proposed playing fields and outdoor sports facilities in relation to proposed residential developments to ensure that there is no prejudicial impact • Links provided to Sport England's guidance • Local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas. Recommend Local Plan have separate outdoor sports policy and indoor sports policy to secure money. • Sport England objectives included and should be embodied within relevant Local Plan policies. Links to guidance provided. 	<ul style="list-style-type: none"> • Playing Pitch Strategy and Built Facilities Strategy 	Noted. Consideration of green infrastructure will be within the scope of the full review.
0023	Fylde Council	<ul style="list-style-type: none"> • No comments on scope of Full Review. Happy to engage further as this develops. • Welcome cross-boundary strategic matters being discussed with Fylde in advance of the final policy development. This can be achieved via the Fylde Coast Duty to Co-operate meetings established through the MOU. Any final content should have regard to the outcome from those discussions. • Welcome any early draft of content of the Full Review that concerns strategic cross-boundary matters could be shared in advance of publication as this will assist early agreement of the statement of common ground. 	n/a	Noted.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
0024	Lancashire County Council	<ul style="list-style-type: none"> Information provided upon access to Historic Environment Team and archaeological advice available to support the Full Review and links to further guidance. Refer to Independent Economic Review for Lancashire and accompanying Environment Commission work which should form part of the evidence for amending housing figure for the review. To promote healthy lifestyles, consider hot food takeaway policy; adaptable homes standards; active design principles. Education - have major issues with securing school sites and land contributions in Wyre which in turn provides risk to Local Plan delivery. 	n/a	Noted. Consideration of heritage, infrastructure, housing, design and health will be within the scope of the full review.
0025	Stalmine-with-Staynall Residents	<ul style="list-style-type: none"> Concerned over existing large scale development in Over Wyre and impact on rural areas - traffic; loss green space; pressure on existing and lack of infrastructure; land drainage. If more development in over Wyre, needs to be small, sustainable and provide benefits to communities. Focus new developments on brownfield sites close to jobs, facilities, and infrastructure. Need less dependence on cars and focus on road safety. Loss of greenspace - impact on health. Over Wyre should be the green lung of Wyre Borough. Should provide large garages for cars to get them off the street. Improved facilities - should be building where access to sustainable transport. Impact on local services - school and health care resulted from development in Stalmine. Land drainage - needs to be improvement Housing targets - should be reduced and redirected to brownfield sites south of River Wyre. 	n/a	Noted. Consideration of employment, housing (including brownfield), drainage, infrastructure and highways will be within the scope of the full review.
0026	United Utilities	<ul style="list-style-type: none"> United Utilities Assets - need to be considered in development proposals and masterplanning. Future growth strategy and allocations - welcome early engagement on any proposed allocation and opportunity to be part of site selection process where possible. Once further information available will be able to consider impacts of allocations on our infrastructure. Any growth needs to be considered to ensure new infrastructure provision does not cause unexpected delay to development delivery. Wyre's rural nature means that rural areas are often supported by infrastructure proportionate to their rural location. Disproportionate growth in rural settlement has potential to put strain on existing water and wastewater infrastructure. Good practice to ensure growth is proportionate to the size of the settlement. Co-ordinated infrastructure provision - may be necessary to coordinate development delivery with timing for infrastructure delivery. Groundwater Source Protection Zone - new development sites are more appropriately situated away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to groundwater source protection zone 1. Key in Wyre as it is the location for significant groundwater abstraction for public water supply. Flood risk from public sewer - as part of site selection, request early sight of potential allocations so we can advise you on potential sewer flood risk. 	<ul style="list-style-type: none"> Prepare evidence to justify optional water efficiency standards 	Noted. Consideration of infrastructure, environmental constraints, green/blue infrastructure, flood risk and climate change will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<ul style="list-style-type: none"> • Climate change - welcome climate change policy. Sustainable surface water management and efficient use of water should be critical elements of such a policy. Climate change policy should link to wider policies including those related to detailed design of new development and provision of blue/green infrastructure. should include natural flood management, multi-functional sustainable drainage, resilient design and incorporate water supply efficiency measures. If required, strategic allocations to include link between green/blue infrastructure, surface water management and landscape design. • Large Multiple Ownership sites - concerns over these sites and achieving sustainable development by developers/applicants working independently. Should be raised with developers/applicants at early stage. • Sustainable Drainage foul and surface water - foul and surface water should be managed in sustainable way. Future policy should set out hierarchy of drainage options with public sewer at bottom. Recommend flood risk and surface water management should be two separate policies. • Water efficiency - recommend optional water efficiency standard in new local plan. We have endorsed evidence prepared by Water Resources West to justify this approach. Surface water should be managed close to source, encourage council to embrace all water efficiency measures. • Biodiversity Net Gain - welcome opportunity to engage in councils approach to delivery BNG and identify strategic opportunities for local nature recovery. Not support hierarchy approach that requires BNG onsite that could impact on delivery of infrastructure developments. 		
0027	Rossall School	<ul style="list-style-type: none"> • Support circumstances in current Local Plan where additional development in and around the school may be appropriate. This has supported investment in the new school sporting facilities. We wish this support to continue in new local plan. Should be clear and supportive policies to allow for growth.. • School seeking to deliver its Strategic Plan and long-term investment in and around the school in coming years. Likely to involve additional development in and around the campus, but extend and level not yet finalised. 	n/a	Noted.
0028	Wainhomes co Emery Planning	<ul style="list-style-type: none"> • Plan period to 2040 as a minimum is necessary • Referring to NPPG. The minimum local housing need figure under the standard method is the starting point. As part of the full review, evidence base needs to assess the criteria in para 2az-010 of the NPPG particularly as Wyre has been part of the wider Housing Market Area. Affordability not fully addressed by affordability adjustment being applied. Need to consider circumstances where appropriate to uplift due to housing need likely to exceed past trends - growth strategies; strategic infrastructure improvements; authority agreeing to take unmet need from neighbouring authorities. Also, need to consider situations where previous housing delivery in area or previous assessments of need in recent SHMA are significantly greater than outcome from standard method. Standard method does not address delivery of economic benefits which the full OAN. Standard method only includes uplift of 37 units, this will significantly be detrimental to the provision of affordable homes. 	<ul style="list-style-type: none"> • Up to date housing evidence and affordable housing need. 	Noted. Consideration of housing will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<p>Need to undertake an affordable homes update to see if affordable ratio is appropriate.</p> <ul style="list-style-type: none"> Referring to Local Plan Expert Group published report to Communities Secretary and to the Minister of Housing and Planning in March 2016, should be a 20% supply buffer included above the requirement. 		
0029	Bourne Leisure Ltd co Lichfields	<ul style="list-style-type: none"> Drivers of change for tourism economy (Brexit, Covid-19, increased frequency or shorter UK breaks) means continued need for further investment. Tourism key employer in Wyre. Policies that limit tourism would have impacts on wider economy. Biodiversity mitigation is the appropriate response in situations where adverse impacts may arise. If the Local Plan goes beyond the legal 10% BNG requirement, the plan is likely to have unintended consequences on the deliverability of wider sustainability objectives. Cala Gran Holiday park is located in the Green Belt. The Green Belt assessment in 2015 concluded the park does not diminish the contribution of the parcel in preventing the merging of urban settlements. The Park and open space to the south east is in the green belt. For consistency, emerging local Plan needs to recognise this and provide flexibility for similar caravan development in this Green Belt. The Green Belt assessment conclusions needs to be recognised that Cala Gran could be expanded to some extent without further material impact on the Green Belt. The Local Plan could set general guidance figure on what would be acceptable. In various locations, an approach of 20-30% additional floor space to existing development would not materially affect the Green Belt. For Cala Gran we suggest 20%. Holiday Accommodation - current Local Plan takes a generally positive approach to development, this should be retained in new plan. Current EP9 policy should be expanded to explicitly support extension to existing holiday parks not solely new sites. Allow for net increase in units and change pitch types to meet future demand; allow extension to the park without increasing pitch numbers; allow new/refurbished facilities and ancillary infrastructure. 	n/a	Noted. Consideration of employment, leisure, tourism, green belt and biodiversity will be within the scope of the full review.
0030	Environment Agency	<ul style="list-style-type: none"> Climate change adaption and mitigation should be incorporated throughout policies, with development used as an opportunity to deliver positive mitigation and adaption. A strategic single overarching policy to bring this together setting out principles for development that cover mitigation and adaption is needed. Mechanism to allow developers to contribute to off-site climate change adaption measures. Require development over a certain level to produce climate change statement. Flood risk management including climate change. Future flood risk now required to be considered in sequential test. Sustainable water use and water resource availability. Biodiversity Net Gain (BNG). Clear links between climate change (including mitigation and adaption), BNG, green/blue infrastructure, natural flood management, reducing impacts on water quality and benefits for people and the natural environment Optional standard set through building control for water efficiency and water sensitive design. 	<ul style="list-style-type: none"> Update or new SFRA to reflect current flood modelling, flood zones and climate change allowances. For flood risk, manage any cross-boundary risks. Encourage joint SFRA with Blackpool and Fylde Council. 	Noted. Consideration of climate change, flood risk including water management and biodiversity net gain will be within the scope of the full review.
0031	Preesall Town Council	<ul style="list-style-type: none"> Full Review is a chance to respond to Climate Change. Planning decisions should align with commitment to reduce carbon emissions and be net zero by 2050. 	n/a	Noted. Consideration of climate change, infrastructure, health and wellbeing, flood risk including water management will be within the scope of the full review.

Unique reference	Consultee	Summary of Representation	Summary of Evidence Required	Summary of Council Response
		<ul style="list-style-type: none"> ● Air quality monitoring along A588/B5377 corridor needed due to recent and future development. Air quality and impact on health and wellbeing should be considered. ● Need to consider access and health care capacity. ● Protect existing PROW whilst permitting future development and create new should be considered. Maintain and enhance open space, sports and recreation space, broad range of community facilities and leisure activities. ● Increase public transport provision; rural development will increase traffic. Need to make walking and cycling the first choices of travel. Highway network still fragile ● Education capacity - can it deal with new development ● Need to consider flood Risk and Surface Water Management ● Support Standard Method. 		
0032	Applethwaite co Smith and Love Planning	<ul style="list-style-type: none"> ● No major comments on scope and expects the scope to largely replicate the scope and content of the adopted Local Plan. ● Housing is significant issue. Scope and evidence base must ensure local housing need assessed and assessed for wider Garstang and A6 corridor settlement area. ● Must review transport evidence following improvements to M6 junction 1, new M55 junction 2 and Preston West Distributor Road, which will be open and operate early in Full Review Local Plan period. ● Need to be more diverse range of suitable and specialist housing to meet needs of older people. 	Highway and transport evidence.	Noted. Consideration of housing and infrastructure will be within the scope of the full review.
0033	Natural England	<ul style="list-style-type: none"> ● Expect Natural Environment to be considered which includes: biodiversity, geodiversity, ancient woodlands, soils, priority habitats, ecological networks and protected species. Sources of evidence provided for topics. ● New vision and strategy should address impacts on the natural environment and set out environmental ambition. Strategic approach to protect, restore and enhance natural environment including Biodiversity Net Gain and enhance and improve connectivity and access to nature and greenspace. Nature based solutions to climate change mitigation and adaption. ● Objectives - strategic objectives relating to natural environment and climate change and measured against specific targets. Examples of measures in relations to nature based climate solutions and ecosystem based adaption provided. ● Biodiversity - should set out strategy for protection, restoration and enhancement of biodiversity. Functionally linked land remains key issue for Wyre and recreational disturbance and impacts on designated sites. ● Peat - Wyre includes large areas of peatland, which are not insignificant. Implications of development on peat, inappropriate management and carbon emissions from development should be considered. ● Green Infrastructure - welcome overarching GI policy. Welcome trees, woodland, hedgerows and landscaping policy. 	n/a	Noted. Consideration of the natural environment, climate change, biodiversity, environmental constraints including peat and green infrastructure housing will be within the scope of the full review.

Appendix C – Original Consultation Responses

Riley, Fiona

Subject: FW: Wyre Planning Policy - Wyre Local Plan Full Review (Regulation 18 and call for sites - January 2022)

-----Original Message-----

From:
Sent: 26 January 2022 20:02
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Wyre Planning Policy - Wyre Local Plan Full Review (Regulation 18 and call for sites - January 2022)

Wyre does not need anymore housing, I've spoken to the MP for the local area and obviously I know he will lie to me but he stated that no more fields should be lost through ugly housing in our area, especially when so many are still unsold, most aren't under the 'affordable housing' category, aren't in keeping with the local materials and styles and are on most of the local floodplains causing so many issues.

No infrastructure has been put in place to provide more jobs or activities for all the new people in the area, which in turn makes the roads to Preston and Lancaster an absolute nightmare, there are then no extra care for speed limits, lights or zebra crossings, actually making some of the new housing estates so unsafe to anyone just trying to cross the road.

When will this actually end- when there's no greenery left at all?!

I'm actually trying to move far away from the area after xx years there because I'm now just gutted every time I'm driving home.

Wyre is just being destroyed for greedy selfish people who will have nothing personally to do with the area!

Riley, Fiona

Subject: FW: Wyre Planning Policy - Wyre Local Plan Full Review Scoping

From:
Sent: 27 January 2022 13:11
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Wyre Planning Policy - Wyre Local Plan Full Review Scoping

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OFFICIAL

Public Consultation. Regulation 18 and Call for Sites 2022

The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 (as amended)
Wyre Local Plan Full Review Scoping Consultation and Call for Sites

Network Rail has the following comments in regards to the Local Plan Full Review Scoping Consultation for consideration going forward:

- Existing and future railway capacity (for both passengers and freight)
- Any potential operational railway enhancements
- Adequate facilities to promote the use of rail freight as an alternative to road based transport
- Enhanced facilities and improvements to stations, including opportunities to create new homes, better public space, enhanced connectivity and accessibility.
- Level crossing safety, and closure where new development changes risk
- Consideration of development sites that are surplus to operational requirements (pending full consultation with Network Rail)

Regards

Diane Clarke
Town Planning Technician LNW
Network Rail

Riley, Fiona

Subject: FW: [External] Wyre Planning Policy - Wyre Local Plan Full Review (Regulation 18 and call for sites - January 2022)

From: The Coal Authority Planning

Sent: 28 January 2022 16:07

To: Policy, Planning <Planning.Policy@wyre.gov.uk>

Subject: FW: [External] Wyre Planning Policy - Wyre Local Plan Full Review (Regulation 18 and call for sites - January 2022)

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Dear Planning Policy team

Thank you for your email below regarding the Wyre Local Plan Full Review (Regulation 18 and call for sites - January 2022) Consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

As you are aware, Wyre Council lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.

In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

Kind regards

Deb Roberts

 **The Coal Authority**

Deb Roberts *M.Sc. MRTPI*

Planning & Development Manager – Planning & Development Team

T :

M :

E :

W :

Riley, Fiona

Subject: FW: Planning Policy

From: David Fisher

Sent: 08 February 2022 16:37

To: Policy, Planning <Planning.Policy@wyre.gov.uk>

Subject: Planning Policy

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Dear Sir

With reference to you planning policy:

Over the last 2 covid years my form of exercise has been cycling round the Fylde during which I pass through many of the Wyre villages. What strikes me is the number and size of housing developments all contain large houses or up market bungalows. Some villages are doubling in size. Exactly the type of houses that are not needed in this area, an area that is badly served with meaningful jobs, poor infrastructure and services.

The only houses you should be authorising are genuine affordable houses to buy or rent such as the council house. these the council should be building. Most of these have been sold off by successive conservative governments.

Yours faithfully.

Mr D. Fisher

Riley, Fiona

Subject: FW: Have your say wyre local plan

From:
Sent: 10 February 2022 14:40
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Have your say wyre local plan

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Hi My say is before you build more houses improve the roads and the schools and save the shops, you want to protect us from flooding stop covering the green fields with houses and improve the antiquated drainage systems. You want to stop man made global warming, provide better bus services instead of selling them off to numpties that just put profits before everything else. In the last 10 years 90% of the large trees around Thornton have been chopped down, why have you allowed this?

David Wilson

Riley, Fiona

Subject: FW: Peat/Flood management

From:
Sent: 10 February 2022 15:39
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Peat/Flood management

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Perhaps the Holts lane fields could be used as a flood plain?
I was surprised to hear that peat was removed from the site. I thought that in terms of biodiversity and climate change it was vital to leave it in the ground.

Yours sincerely,

Margaret

Warren Hilton
Assistant Spatial Planner
9th Floor
Piccadilly Gate
Store Street
Manchester
M1 2WD

Planning Policy
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

17 February 2022

Sent Via Email

Dear Sir / Madam,

Wyre Local Plan Full Review Scoping Consultation and Call for Sites

Thank you for inviting National Highways to comment as part of the Regulation 18 scoping stage consultation for the Full Review of the Wyre Local Plan 2011-2031.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). We are responsible for the operating, managing capacity, maintaining and improving the SRN - the SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. **It is an ambition to ensure that major roads are more dependable, durable, and most importantly – safe.**

The SRN within the Borough of Wyre comprises of a section of the M6 motorway, which forms a key part of the north / south road connectivity for the west of Britain and the A585 trunk road (M55 Junction 3 to Fleetwood), although further afield the district is served also by the M55 motorway, which provides the main link between the Fylde coast conurbation and the M6. The A585 trunk road north of M55 Junction 3 provides an important link between the Fleetwood peninsula and the remainder of the SRN. Government policy, set out in the Road Investment Strategy 2 (2020-2025), is to seek the detrunking of the A585 following completion of the A585 Windy Harbour to Skippool Bypass scheme; the route no longer fulfilling its primary purpose to serve the Irish Sea ferry port of Fleetwood, which closed in 2010.

National Highways' approach to engaging with the planning system is governed by the advice and guidance set out in **The Strategic Road Network Planning for the Future** - A guide to working with National Highways on planning matters (2015).

The document is written in the context of statutory responsibilities as set out in National Highways' Licence, and in the light of Government policy and regulation, including the:

- National Planning Policy Framework (NPPF);

- Town and Country Planning Development Management (Procedure) Order (England) 2015 (DMPO); and
- DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development ('the Circular').

At this early stage in the development of the Local Plan, it is National Highways' role to provide initial comments, raise potential issues and make recommendations where appropriate.

National Highways' key planning guidance document, '*The Strategic Road Network: Planning for the Future*' (2015) sets out that the preparation of local plans provides an opportunity to support a pattern of development that minimises the need for travel, minimises journey lengths, encourages sustainable travel, and promotes accessibility for all. This can contribute to the achievement of environmental objectives and reduce the cost to the economy arising from the environmental, business and social impacts associated with traffic generation and congestion. For all these reasons, we are keen to contribute to the plan-making process.

In terms of Local Plans setting out the location of development through site allocations, National Highways' policy guidance states:

"Development should be promoted at locations that are or can be made sustainable, that facilitate the uptake of sustainable transport modes, and support wider social and health objectives, and which support existing business sectors as well as enabling new growth.

When a local plan document proposes site specific allocations, we will want to ensure that all relevant transport impacts and requirements are taken into account. To this end we will work with LPAs to:

- *identify the impact that the proposed allocations are likely to have on the SRN on an individual and, insofar as is necessary, a cumulative basis, factoring in the demands arising from development planned in adjacent authorities where appropriate;*
- *assess the impact of the SRN on the development potential of sites that are proposed to be allocated;*
- *consider travel plan, travel demand and off-network improvements; and,*
- *as necessary, identify the infrastructure requirements of the proposed allocations, or specific parts (phases) of proposed allocations.*

Whilst we may comment upon proposals where they impact the SRN, allocating land for particular uses is a matter for local authorities and others providing services or facilities to meet this need."

In supporting and considering draft local plans, we will seek to influence the scale and patterns of development so that it is planned in a manner which makes best use of capacity on the SRN and will not compromise the fulfilment of the primary function of the SRN. Ideally, development locations should be chosen that would minimise the need for travel and facilitate the use of sustainable transport.

A key factor in determining the eventual Local Plan development scenario is not simply location, but the quantity of development that transport networks can accommodate. Where a higher level of growth is desired than these networks can cater for, then the necessary infrastructure

requirements will need to be identified, explored in detail, and then evidenced and evaluated as part of developing the Plan itself *before* allocating the final site allocation quantum / distribution. This will necessitate a robust transport evidence base to be established. Our expectation therefore is that the transport evidence base for the Wyre Local Plan (2011 – 2031) Full Review should be led by Wyre Council and developed in full accordance with current planning policy and guidance

It is worth reiterating that capacity enhancements and the infrastructure required to deliver sustainable strategic growth should be identified at the local plan preparation stage, and not at planning application stage – this requirement is set out within section 5 of the Department for Transport Policy Circular 02/2013 'The Strategic Road Network and the Delivery of Sustainable Development', which governs how Local Plans affecting the SRN should be prepared.

The Local Plan stages provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs. National Highways would welcome the opportunity to work with the Council in the development of these policies and the Infrastructure Development Plan (IDP) to ensure development comes forward in a sustainable manner and that alternative sustainable transport options are made available in the right place and the right time to cater for local trips.

As part of this, we feel that it essential that the Council produces a robust set of transport evidence in support of the emerging Local Plan and how the associated transport growth impacts on air quality are to be managed. According to the Department for Levelling Up, Housing & Communities' guidance, '*Transport evidence bases in plan making and decision taking*', an assessment of the transport implications should be undertaken at several stages in preparing the Local Plan. It should therefore be an iterative process that becomes more refined through the process itself; ultimately shaping its development rather than this being collected retrospectively or retrofitted to the development strategy.

The Department for Levelling Up, Housing & Communities' guidance sets out the issues to be considered in developing a transport evidence base, including the need to:

- *“assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms.*
- *assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport.*
- *highlight and promote opportunities to reduce the need for travel where appropriate.*
- *identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate.*
- *consider the cumulative impacts of existing and proposed development on transport networks.*
- *assess the quality and capacity of transport infrastructure and its ability to meet forecast demands.*
- *identify the short, medium and long-term transport proposals across all modes.”*

We advise that the emerging Local Plan transport evidence base is supported by appropriate traffic modelling of the SRN and its junctions that reflects how traffic interacts across area as a whole, which includes those important junctions for access to the Borough that are located outside its administrative boundaries; namely M55 Junctions 1 and 3 and M6 Junction 33. National Highways supports the preparation of a transport evidence base within a timeframe that allows for the opening to traffic of the A585 Windy Harbour to Skippool Bypass (expected

autumn 2023) so that the impacts of this improvement on the operation of the highway network can be properly accounted for.

National Highways would therefore welcome the opportunity to engage with Wyre Borough Council to discuss the intended approach to preparing this assessment and how we may assist in the provision of information and support.

National Highways comments on Scope, Issues and Options

Although we note that no 'Issues and Options' documentation has been produced to accompany this consultation, National Highways comments as follows on the key issues and topics regarding the SRN that the Local Plan Full Review will need to be aware of.

- National Highways' view is that the Local Plan Full Review provides an ideal chance to now align growth more definitively around sustainable transport modes, rather than a reliance on the road network as before, where the scope for future capacity improvements are limited. Since the current Plan was developed, improvements to rail services at Poulton-le-Fylde and the recent momentum in re-establishing a rail link to Fleetwood are examples of the opportunities that should be utilised. In this way, measures to encourage greater use of sustainable modes and support new public transport infrastructure should be within the scope of the Local Plan, which in the case of a new rail link to Fleetwood could be physically more easily facilitated by the detrunking of the A585.

The transport evidence base produced to support the Local Plan Full Review should consider all modes of transport for potential infrastructure solutions to support growth, and not just focus on seeing highways infrastructure as being the only solution without properly exploring any alternatives that could form part of a credible wider answer to increased transport demand associated with the Plan growth.

Where infrastructure needs are identified to facilitate the Council's full OAN growth requirements in a sustainable way, and where measures are not already within the committed programmes of the infrastructure providers concerned, the Council should take the lead in both identifying and promoting those solutions for delivery at the appropriate time within the lifetime of the Plan in consultation with the provider(s) concerned. National Highways would be happy to assist the Council in this regard from the perspective of being the operator of the SRN.

- Whilst major improvements to the A585 trunk road have been committed in the form of the recently completed Norcross roundabout improvement and the Windy Harbour to Skippool Bypass (under construction), there remain other junctions which experience congestion at peak times, such as at the Thornton roundabout junction and Eros roundabout junction; the former being identified as in need of further improvement to facilitate growth in the evidence base of the current Local Plan.

In addition to this, it was identified during development of the current Local Plan evidence base that further and more significant improvement of M55 Junction 3 would be required to cater for the traffic impacts of growth in both Wyre and Fylde from the late 2020s.

Where the need for improvements has been previously identified, it should be noted that there is no certainty that such schemes will be funded for delivery as part of National Highways' forward programme.

- Although located outside of the borough's boundary, the A585 section between Windy Harbour and M55 Junction 3 is comparatively narrow and hosts a series of direct property frontages and accesses within Greenhalgh and Esprick which do not meet modern requirements in terms of design and visibility between those using the A585 and those seeking to enter it. These problems manifest in a history of shunt-type incidents, with the width and density of traffic flow on the A585 resulting in traffic behind vehicles turning into these accesses being held back and unable to overtake or pass the vehicle ahead waiting to turn, which restricts traffic flow.
- With regard to the A6 corridor, the main issue is the ability of the M55 Junction 1 to accommodate development traffic, which in recent years has been growing along the A6 corridor both within Wyre and Preston. Currently traffic queues from the Junction 1 westbound off slip onto the mainline link create safety and operational concerns.
- We recommend that the needs of commercial road freight industry are given active consideration in the development of the new Local Plan from the perspective of ensuring an improved level of provision for lorry parking and associated facilities within the district (both dedicated Lorry Parks and within the design briefs for commercial site allocations).

The provision of lorry parking sites is a growing priority for the Department for Transport (DfT) as well as Road Haulage Association and Freight Transport Association. In 2017, DfT commissioned a full audit of utilisation of over 4,000 parking areas including official lorry parks, Motorway Service Areas and industrial estates and laybys. The survey found that there is an increasing need for overnight lorry parking, and that there is a shortfall in provision in six regions of England (including the North West region). This issue manifests itself in terms of freight vehicles parking overnight within inappropriate roadside locations, resulting in safety concerns, litter / nuisance and roadside lay-bys not being able to accommodate other road users.

As operator of the SRN, DfT has asked National Highways to raise the profile of lorry parking provision in the making of Local Plans through our role in the local planning process, especially if planned development is likely to increase HGV traffic to the area our network serves.

Given that the M6 within Wyre provides a key north / south route within Britain, the study (published in 2019) found that there is a requirement for an increased level of dedicated lorry parking provision (covering various price points and service levels) within the area, and this is detailed within enclosed extract from the resulting 2019 Lorry Parking Demand Assessment survey report for Central Lancashire. National Highways would welcome the opportunity to share the main report with the Local Plan Team and to explain how we may be able to support the provision of new or improved provision of dedicated private lorry parking facilities in proximity to the SRN.

Conclusion

The Localism Act 2011 placed the responsibility of 'Duty to Cooperate' on local authorities to ensure that any local or cross-boundary impacts have been fully considered and addressed appropriately in preparing the Local Plan. The local authority must demonstrate that they have discussed such matters with the relevant bodies, including National Highways.

National Highways notes that the Wyre Local Plan 2011 – 2031 Full Review is in the early stages of development and understands further work will be undertaken before the consultation begins on the Preferred Option. At this early stage in the plan-making process, no specific land allocations or future growth policies have been made. While placing new sites within close proximity of the SRN may be beneficial to connectivity, this may cause capacity issues on the SRN, and air quality and noise pollution problems for the new developments.

We would welcome dialogue with Wyre Borough Council to ensure that the cumulative highway impacts of the emerging Local Plan are appropriately assessed and considered in respect of the SRN, and also that alternative sustainable transport options are made available in the right place at the right time to cater for the forecast development demand. We would also welcome a clear understanding of what development can take place using existing transport capacity, at what time transport interventions are required and how they will be funded and delivered.

We hope that our comments are useful. If you would like to discuss anything about this letter, please contact me.

Yours faithfully,

Warren Hilton
North West Spatial Planning Team
Email:

Central Lancashire

Nationally strategic road corridors

The key road corridors in the area of Central Lancashire include:

- The **M6** – This road corridor provides the primary north-south route through the North-West, connecting a number of key cities from the Midlands up to Glasgow (via the A74(M) and M74).
- The **M65** – This east-west route does not constitute a full trans-Pennine freight route as the M62 does, but it offers direct access to the eastern portion of Lancashire, including Blackburn and Burnley.
- The **M61** – This short motorway connects the north-west section of the M60 to the M65 and M6. Only the northern half of this route lies within Lancashire, with the southern part in Greater Manchester.

Major freight generators and attractors

The primary role of the Central Lancashire corridor in the freight sector is to carry through-traffic along the M6, which offers long-distance travel between a number of key areas, such as industrial regions in the Midlands, the port of Liverpool, and a number of industrial and distribution hubs around the Merseyside-Greater Manchester conurbation.

In terms of domestic road freight, the North-West attracts more inbound goods than it sends out (37 million tonnes compared to 32 million tonnes), although the majority of goods only travel within the region (114 million tonnes). The region hosts 76 million square feet of warehouse space, ranking fourth among the seven regions of England.

Provision of lorry parking

A total of six lorry parks were surveyed in the Central Lancashire area as part of the DfT survey of which four were either critically or seriously utilised (over 70%). Four of these lorry parks are located directly on the M6 (in two pairs), with the remaining two being located nearby on the A6. The more northerly of these two lorry parks was not considered to be critically or highly utilised, along with the southbound side of the M6 services at Lancaster. Across the six lorry parks there is capacity for 140 lorries while 119 lorries were using these facilities at the time of the survey, although both of the sites at Charnock Richards (M6) recorded more vehicles than their stated capacities. The table below outlines the lorry parks from north (A) to south (F).

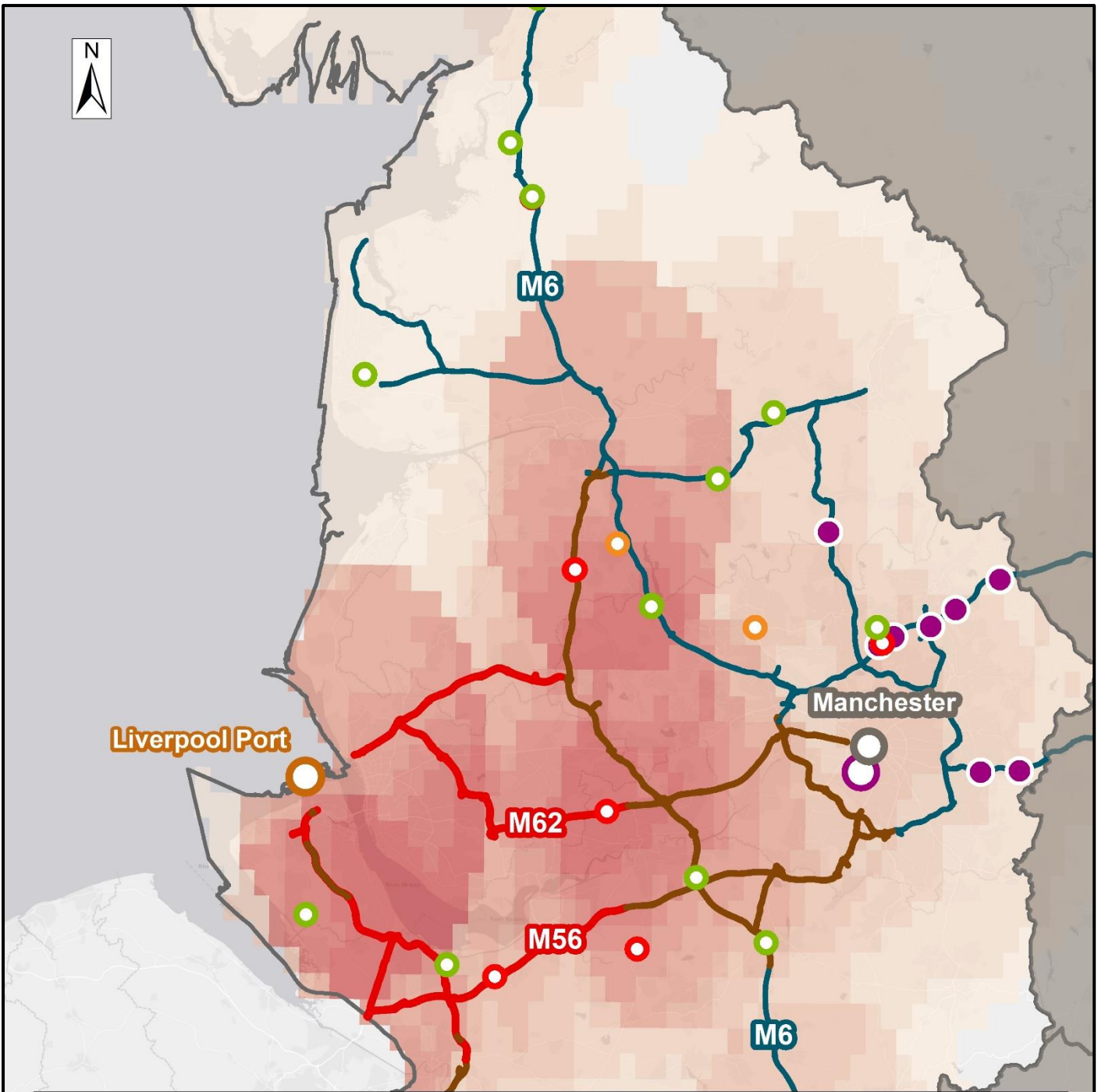
Feature	A	B	C	D	E	F
Toilets/showers	✓	✓	✓	-	✓	✓
Café	✓	✓	✓	-	✓	✓
Accommodation	✓	✓	✓	-	✓	✓
Security fence	-	-	-	-	-	-
CCTV	-	-	-	-	-	-
Charge	£18.00	£21.50	£21.50	Free	£23.00	£23.00
Capacity	25	25	25	10	~31 (39)	~24 (30)
Utilisation	12%	68%	88%	80%	126%	125%

Off-site lorry parking incurred

The main areas within Central Lancashire which incur off-site parking are in the areas around Preston and Garstang, although there were a number of unoccupied industrial estates around Lancaster as well. A total of 86 lorries were parked in industrial estates around Preston, the majority of which were in the Walton Summit estate, as well as one additional vehicle that was recorded in a lay-by. In addition, there were 12 vehicles in lay-bys around Garstang along the A6, which runs parallel to the M6.

Summary

This study has found that there is a high demand for lorry park facilities, as well as a significant amount of off-site parking in certain areas of Central Lancashire. The section of the M6 that runs through the region is a key part of many long-distance freight journeys, meaning that drivers will require facilities for short-term breaks and overnight stays. The provision of additional lorry parking should also be considered with any additional industrial estate developments.



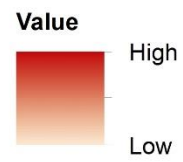
LEGEND

Lorry Park Utilisation Category

- CRITICAL (> 85%)
- SERIOUS (70% - 85%)
- ACCEPTABLE (< 70%)
- Issues identified by stakeholders

- Issues identified by TOs
- Strategic Road Network
- Some demand from ports
- Medium demand from ports
- High demand from ports

Utilisation Density (Off-site)



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Subject: FW: Review

-----Original Message-----

From: Robert Cooke
Sent: 20 February 2022 15:00
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Review

Sir

I submitted my comments on the Borough Partial Review some time ago, so I now submit the requested comments on some of the areas listed in the Borough newsletter.

BROWNFIELD DEVELOPMENT: There are apparently twenty-two brownfield sites in the borough, but only two under active consideration for development. Some brownfield sites have been superbly developed, proving what can be done. I would suggest that any developer looking for a site in the borough should be shown the sites and told that they are the only areas available. If he doesn't like them he can look somewhere else: the green areas of the borough have been damaged enough.

NATURE RECOVERY AND BIODIVERSITY: We have some wonderful natural areas in the borough, where residents can enjoy nature. If these green areas are lost they cannot be re-created. The Partial Review talked about the loss of green areas and the creation of areas elsewhere resulting in a "net gain" in biodiversity. If something already exists, why destroy it and then try to recreate it somewhere else? When did man ever do better creation than nature?

HOUSING: The Environment Agency calculates that the number of premises in the borough which could possibly suffer flooding is an amazing 28,500, yet more houses are being given planning permission on flood plain areas. In recent months we have seen diggers on building sites sink many feet into land which is supposed to take house foundations. Who will be responsible when claims start to arrive as houses begin to crack or sink? Also, as housing density increases so does CO2

emissions: forget green targets as the roads clog up and an increasing number of vehicles spew out fumes while standing in queues on roads ill-equipped to take them, while at the same time the green areas which can absorb carbon are put under concrete. Apart from this, where are the schools and doctors for the rising population? I understand that refusal of planning permission is likely to be overturned on appeal in many cases, and this would appear to be because of lack of adequate support from the Environment Agency and County Council. Perhaps Wyre Borough Council needs to put great pressure on those two bodies to look at the WHOLE picture instead of just a small area.

EMPLOYMENT: Wyre Borough is becoming a dormitory area, which puts more strain on transport. The Partial Plan talks of attracting higher-paying jobs to attract people to the area. This takes no account of the fact that the Fylde was traditionally a farming (and at one time fishing) area where jobs were traditionally low-paid, although there were and are many skilled craftsmen here. Higher paid jobs, such as those in heavy industry do not exist and would be inappropriate here.

I hope my observations will be taken into account and will prove helpful.

Robert Cooke

Riley, Fiona

Subject: FW: Have your say on Wyre's Local Plan
Attachments: Wyre Local Plan Inspetors Reort Final (Inskip).docx

From: inskip pc
Sent: 21 February 2022 11:11
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: FW: Have your say on Wyre's Local Plan

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In making plans to update the Local Plan Inskip-with-Sowerby Parish Council wish to remind Wyre Planners of the findings of the Planning Inspector in 2018, namely that further expansion of the Inskip settlement is not sustainable. See attached extract from the Inspectors final report.

“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. Cumulatively these adverse impacts indicate to me that the scale of allocations would be too large and would outweigh the benefits.”

In 2016 the core settlement at Inskip consisted of 236 dwellings. Since then Wyre Council have permitted three housing developments totalling 27+55+30=112 additional dwellings. Though this increase is significantly less than Wyre’s original plans for an Inskip Extension it still represents an almost 50% increase in the size of the community. In line with the Inspectors finding the Parish Council recommends and urges Wyre Planners to protect Inskip from the “benefits” of any further development at this time and to include no further housing allocations at Inskip in their plans.

Kind regards,
Mike Ainsworth
Inskip-with-Sowerby Parish Clerk
xxxxxxxxxx

Riley, Fiona

Subject: FW: Wyre Regulation 18 Scoping Consultation

From: James Teasdale
Sent: 01 March 2022 13:11
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Cc:
Subject: Wyre Regulation 18 Scoping Consultation

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Dear Sir/Madam,

Thank you for inviting Blackpool Council to comment on the Regulation 18 Scoping Consultation for the Wyre Local Plan Full Review. We have no comments to make at this stage however we look forward to continue working with Wyre Council through the Fylde Coast Duty to Cooperate.

If you have any queries or would like to discuss anything further please do not hesitate to contact me.

Yours sincerely,

James Teasdale

James Teasdale
Graduate Assistant Planner
Planning Strategy
Blackpool Council
XXXXXXXXXXXXXXXXXXXX

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WYRE LABOUR GROUP RESPONSE TO THE WYRE LOCAL PLAN FULL REVIEW SCOPING CONSULTATION AND CALL FOR SITES – 2022

The scope of the full review must include, but not be limited to the following:-

1. Evaluation Of The Current Local Plan

- Re-evaluate all current Vision Statements
- Re-evaluate all current Objectives
- Evaluate the success, or otherwise, of all policies

By doing so, this may focus attention as to where the major obstacles lie.

2. The Vision for Wyre

The Vision in the 2019 adopted Local Plan needs to be revised with a view to tackling a number of existing issues. Below is a list of the main issues along with the required response to these issues as part of this full review:-

2.1 Climate Change

- The need to tackle Climate Change must be at the heart of Wyre's vision.
- The plan must reference out to a 'roadmap' of how Wyre Council and the Borough will reach net zero carbon emissions.
- Specifically, there must be a vision for Local Area Energy Plans, whereby these plans (numerous zones across Wyre) are integrated with the Local Development Plan.

2.2 An under provision of employment opportunities

- There must be a vision to improve local job opportunities and drive down the both average commute distance, and the percentage commuting out of the Borough (was 46%, but possibly at 50% after the Norcross closure).
- Not only is this essential for growing the local economy but it is essential to drive down carbon emissions.

2.3 A transport system that isn't fit for purpose

- The Vision must specifically mention that the return of the Poulton to Fleetwood line is essential (not just an aspiration).
- Specifically, a solution must be sought so that the rail reinstatement can reach the heart of Fleetwood, with a new station suitably located close to the centre. This is essential for the economic regeneration of the town and its high street.
- Improved connectivity between Fleetwood, Thornton Cleveleys, and Poulton should be at the heart of a suitable vision promoting the greatest possible use of sustainable and active forms of travel with a shift away from cars to walking/cycling/public transport for shorter trips.

2.4 An under provision of formal and informal public open space in every town

- Protection of existing green spaces and promoting of new appropriate green infrastructure must be at the heart of a suitable vision.
- An up-to-date open space audit is required to inform decision making.

2.5 A low waged economy

- There must be a vision to improve wage levels and pay the Living Wage or more, across the Borough.
- A higher-waged economy will help to drive down commuting, which in turn will drive down carbon emissions.

2.6 The decline of our high streets

- Paras 2.2, 2.3, 2.4, and 2.5 all relate.

3. Housing Location

3.1 The suitability of current allocations must be reviewed with the following in mind:-

- Climate Change.
- Local Area Energy Plans, and whether or not the proposed developments (currently allocated) can deliver net zero carbon emissions.
- Current and future flood risks.
- Density of population in a specific area / town.
- Current provision of public open space in area / town and the impact the proposed allocation would have on that provision (any overall under provision by area/town should be viewed dimly).
- Long-term red lines for development within Wyre but specifically for each town or village must be put in place. For clarity, there must be a limit to development in urban areas, and it is suggested that in the western urban area of Wyre, this limit has already been passed in certain places. Whatever separation between settlements that there currently is needs to be maintained. The separation between Thornton Cleveleys and Fleetwood is closing, and the separation between Poulton and Carleton has almost gone, as has the separation between Carleton and Blackpool. If Wyre proceeds along the lines of the previous and the current Local Plan the position will ultimately become irretrievable, with Wyre being incapable of rectifying the acknowledged shortfall in public open space in all its towns
- Local employment opportunities.
- Infrastructure provision
 - current and future transport connectivity
 - doctors and dental surgeries
 - access to public open space
 - proximity and capacity of schools

3.2 The suitability of newly proposed allocations must be reviewed with the following in mind (as per 3.1).

3.3 Specifically, the use of Fleetwood port for housing should be reconsidered with a view to a revitalised port being able to support a growing green economy, windfarms, and a new barrage. This is essential to tackle the situation whereby all Fleetwood wards, and Jubilee Ward in Cleveleys, feature nationally in the bottom 10% most deprived in a number of categories :-

- For education, skills and training deprivation
- For employment deprivation
- For income deprivation
- For health deprivation

3.4 Following on from this, it is clear that in general Wyre's strategies and policies should be reconsidered with a view to tackling these appalling set of statistics.

4. Housing Mix

4.1 Policy must be strengthened to ensure the supply of housing matches the demand; it should not be supply led. Unlike the previous local plan, a revised one must take more than just note of the Strategic Housing Market Assessment (SHMA), with policy ensuring that Wyre does not deliver increasing property sizes at the same time as average household sizes reducing. ie. The anomaly below must be addressed in the next Draft Local Plan.

- Fylde Coast SHMA Para 5.33 – Average household size has decreased from 2.29 to 2.24 between 2001 and 2011.
- Fylde Coast SHMA Para 4.44 – Property sizes in Wyre increased from 5.38 to 5.59 rooms between 2001 and 2011.
- Fylde Coast SHMA Para 4.41 – as of 2011, the average number of bedrooms per household in Wyre was 2.75, and importantly the proportion of under-occupied households was 78.4%.

If further evidence was required of something quite wrong, then the 2020/21 Authorities Monitoring Report shines further light on this problem (data replicated from para 5.4). The data reveals that 2/3 bed houses were underprovided for by 29%, mainly at the expense of 4/4+ bed houses. For young families in Wyre wishing to get on the housing ladder, this is not what is required.

Housing Type (Regardless of Tenure)	1 bed	2 bed	3 bed	4 / 4+ bed
Actual tenure provided (%)	14%	13%	32%	41%
SHMA Addendum 3 implied size of housing required (%)	7%	31%	43%	18%
Under / Over Provision	+7%	-18%	-11%	+23%

4.2 Policy must be strengthened to discourage / end the use of Houses of Multiple Occupancy. Such properties, where bathrooms and kitchens are shared would seem inappropriate for the 21st Century.

4.3 Policy inside and/or outside of the Local Plan, must be put in place to encourage and actually allow our elderly to remain independent, living in their own homes rather than Care Homes. More supported living accommodation will help in that regard.

5. Housing Design

5.1 Insulation

- Policies must ensure new properties are at the highest standard possible (Future Homes Standard suggests 75-80% lower than houses built to current Building Regulations). Local Planning Authorities allegedly have the power to set local energy efficiency standards for new homes.
- Wyre must not allow the building of new homes that will need retrofitting in the future.
- If possible, Policies must ensure that older houses being renovated via the Planning system are insulated in line with those highest standards.
- Local Area Energy Plans should include plans for the entire housing stock to be insulated to those high standards, including the removal of ineffective and unsafe insulation where required.

5.2 Renewable Energy

- All new housing estates must be net zero carbon, with no burning of fossil fuels / gas boilers. Developments must be air quality neutral.
- A new house must have an individual solar / heat pump system to supply their needs, or for their need to be met by a community project which supplies a whole estate (and more).
- The renewable energy options should be maximised by careful consideration of site layout, public open space, house design, house and garage positioning, roof orientation etc.

5.3 Electric Car Charging

- Policies must ensure every property has its own electric car charging point, or in the case of apartments / flats, access to a charging point.
- There should be a standard for charging points per number of apartments / flats.
- For existing properties, a policy should be sought to ensure that residents living in terraced streets or flats are not disadvantaged and disincentivised from switching to EVs. Not only does this require the Government to ensure VAT on public chargers is in line with home chargers (5% rather than 20%), but also Wyre needs to consider how it can provide chargers in close proximity to locations where households are not able to have their own off-street charger.
- Policies must be in place to ensure smart electric charging is in place where the renewable energy supply is intermittent.

6. Transport & Tourism

- 6.1 Whatever 'strategy' Wyre has for Transport and Tourism, it should be integrated and aligned with the Local Plan.
- 6.2 Policy must be put in place to manage the unregulated increase in Airbnbs. The housing stock is being diminished, council tax is being avoided, and whatever strategy for tourism that Wyre has is being circumvented.

7. Other Climate Change Related issues

- 7.1 Climate Change must be front and centre of all policies, whether that be within or outside of the Local Plan, ie Climate Change impact should be the first consideration.
- 7.2 Planning Policies should be integrated with, and support, a plan to retrofit all Wyre's housing stock.
- 7.3 Peat bogs should be fully protected, with tree planting aligned to flood prevention. In terms of planning permission for development, tree planting on site should be the preference but developers must provide funding for off-site planting where this is not feasible or only partially feasible.
- 7.4 Wyre should set aside land for re-wilding with the aim of creating new habitats and enabling wildlife to thrive.
- 7.5 Charging Points for non-domestic premises should be provided at an agreed level. An appropriate policy should cover offices, retail, industrial, education, motorway services and 'petrol' stations.

Riley, Fiona

Subject: FW: Comments - Local Plan Full Review

From: Planning

Sent: 02 March 2022 12:22

To: Policy, Planning <Planning.Policy@wyre.gov.uk>

Subject: Comments - Local Plan Full Review

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Good Afternoon

In respect of the above consultation, we recommend the future plan includes policy which supports the district's valued cultural facilities including Marine Hall and Thornton Little Theatre and protects them from loss or harm from insensitive nearby development. This will ensure the plan is consistent with paragraphs 93 and 187 of the NPPF (2021).

We look forward to further engagement as the plan progresses.

Kind regards

Tom Clarke MRTPI
National Planning Adviser

Theatres Trust

XXXXXXXX

T XXXXXX

E [XXXXXX](#)

W theatrestrust.org.uk

Planning Policy,
Civic Centre,
Breck Road,
Poulton-le-Fylde,
FY6 7PU



SENT BY EMAIL
planning.policy@wyre.gov.uk
20/07/2022

Dear Planning Policy Team,

WYRE LOCAL PLAN FULL REVIEW: SCOPING CONSULTATION AND CALL FOR SITES

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wyre Local Plan Full Review Scoping Consultation and Call for Sites.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Council adopted the Local Plan in February 2019, and they have started an early partial review of the Plan in line with Policy LPR1 in relation to meeting the objectively assessed housing need. The Council has taken the decision to commence a full review of the Plan, this consultation is to determine the scope of the new Plan.

Plan Period

4. The current Plan covers the period 2011 to 2031. The HBF considers that any review should ensure that the Plan covers a period of 15 years from the adoption of the Plan. This is likely to mean the Plan will need to cover the period until 2040 and will mean that much of the evidence that had supported the previous Plan will need to be updated.

Housing Requirement

5. The HBF notes that the Council are considering the housing requirement as part of the partial review. However, it is likely that the housing requirement will require further consideration as part of any Plan Review, particularly in relation to any increase in the Plan period, and giving consideration to the development strategy included in the Plan.

Green Belt

6. The HBF considers that the Council will need to assess their housing land supply and any other circumstances that may lead to the need to remove land from the Green Belt. The Council are likely to need to update their Green Belt Review to assess parcels of land against the purposes of the Green Belt, and determine if they are appropriate to be removed from the Green Belt designation.



Affordable Homes

7. The HBF considers that the Council will need to update their affordable housing policy to reflect the Government's requirements in relation to First Homes and Affordable Home Ownership. The Council are also likely to need to update their evidence in relation to affordable housing need and viability to ensure that it is up to date and appropriate to support any updated requirements in the Plan.

Optional Standards

8. If the Council wishes to adopt the optional technical housing standards in relation to accessible & adaptable homes, water and nationally described space standards (NDSS) the Council should only do so in line with the Governments guidance set out in the PPG.
9. In relation to the accessible and adaptable homes the PPG¹ identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.
10. In relation to the water standards the PPG² states that it will be for the authority to establish a clear need for their introduction based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply.
11. In relation to the NDSS the Council need to provide justification for the standards taking into account, need, viability and the need for a transitional period in line with the requirements for the PPG³.

Viability

12. The HBF considers that any policy requirements contained within the Plan should be informed by evidence of need and an assessment of viability. If the policies contained within a Plan are not viable this will lead to the non-delivery of homes and potentially the Plan.

Site Allocations

13. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements. The Council should also provide some headroom

¹ ID: 56-007-20150327

² ID: 56-015-20150327

³ ID: 56-020-20150327

between its minimum housing requirement and overall housing land supply. Whilst there is no numerical formula to determine the appropriate quantum of headroom, if the Local Plan is highly dependent upon one or relatively few sites and geographical locations then greater numerical flexibility is necessary than where supply is based on a more diversified portfolio of sites.

Future Engagement

14. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

15. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

Joanne Harding
Planning Manager – Local Plan (North)

Email:

Phone:

CABUS PARISH COUNCIL

04 March 2022

Director of Planning & Regeneration
Wyre Borough Council
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

Dear Wyre Borough Council Officers

Local Plan – Scoping Consultation & Call for Sites

Cabus Parish Council notes that the current Local Plan was adopted in 2019 and was supposed to meet the Borough's Planning needs up to 2031. Cabus Parish Council is therefore puzzled at the decision to commence a full review of the Wyre Local Plan (2011-2031) only 3 years into the adoption of the current Local Plan.

It is noted that consultation on the scope of the full review is open until 10 March 2022 and that at this stage, the council states that it has not predetermined the issues to be considered. However, as Wyre Borough Council is also engaged in a Call for Sites exercise, this suggests that the Council has predetermined that there is a need for further development potential within Wyre, regardless of whether Local Parish Councils confirm or indicate otherwise.

For the avoidance of doubt, Cabus Parish Council does not wish to see any further sites identified for planning development within Cabus beyond those which have already been included in the current Local Plan (2011-2031).

Cabus Parish Council further notes that since the current local plan was adopted in 2019, Wyre Borough Council has declared a climate emergency and mitigating the impact of and adapting to climate change is a key issue for consideration. Cabus Parish Council also declared a climate emergency at its meeting in September 2019 and fully endorses the need for the current, and any subsequent local plans, to include active measures by which to mitigate the impact of climate change.

Cabus Parish Council submits for consideration that the following planning conditions are attached to all developments -

- Fruit trees and water butts in every garden
- Swift and bee bricks and house martin boxes
- Hedgerows to be maintained and enhanced
- Hedgehog holes through fences
- Abundant native planting schemes which mitigate the use of hardcore building materials
- The creation of mini woodland areas, tree lined roads and grass verges
- All lighting to point downwards to minimise light pollution
- Jogging tracks/footpaths around or through developments
- Enclosed green space for ball games and children's play parks
- Electric charging points (including, adapted lamp posts with electric charging points)
- Solar panels on commercial buildings and private residences
- Heat pumps

Yours sincerely

Clerk to the Parish Council

E-mail: CabusParishCouncilClerk@hotmail.co.uk



**Canal &
River Trust**

Making life better by water

Planning Services
Wyre Borough Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Our Ref CRTR-POL-2022-35128

Monday 7 March 2022

Dear Sir/Madam

Proposal: Wyre Local Plan Review: Regulation 18 and Call for Sites

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

The Trust owns and manages the Lancaster Canal through the Wyre Borough. The Canal is an important multi-functional asset for the Borough, which can play an important role in meeting a number of key policy objectives. It provides vital access to green and blue space which can be utilised to provide significant social, economic and environmental wellbeing benefits for local communities.

We consider an important area for the Local Plan to consider is in providing a policy context to support health and wellbeing, something the Lancaster Canal can play a significant role in promoting. Waterside spaces offer opportunities to promote walking and cycling as a means of getting about and staying active, offering people the chance to connect to the wider benefits of blue health and the various benefits of being water.

As such, the plan should seek to maximise access and the use of waterways as leisure and recreation routes. Where new development would lead to an increase usage of these assets, infrastructure improvements should be provided for and adequate wayfinding considered to maximise the potential of these assets.

We note the Council's recent declaration of a climate emergency and the need for the local plan to play a key role in the mitigating the impact of and adapting to climate change moving forward. In general, the Trust's waterways can assist in addressing climate change, both in terms of adaption to current impacts and by reducing the scale of future impacts.

Examples of the way the canal can contribute to tackling the climate emergency are numerous, from offering low-carbon options for energy via heating and cooling systems to providing low-carbon opportunities for sustainable travel via water or our towpaths. The Lancaster canal also offers opportunities for sustainable leisure, recreational and tourism activities while working to preserve and increase levels of biodiversity. Furthermore, the

Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

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canal can play an important role in water management, offering the potential to mitigate and manage future flood risk.

The character and appearance of the Lancaster Canal has gradually evolved over time and reflects the changing nature of the landscape through the borough, with both urban and rural environments. The canal is itself an important heritage assets, and supports a number of other designated and non-designated assets along its stretch. Any future policies) should require development adjacent to the canal to seek to acknowledge and enhance this character where appropriate.

While each waterside location is different and should be considered individually, the Trust considers that the plan could help promote key principles for attractive development adjacent to the canal. These include the need for new developments to positively address the water space, incorporate access to the towpath and the water and engage with the qualities and benefits of being near water.

The current adopted plan provides reference to water courses and bodies within policy CDMP4 Environmental Assets. The Council may wish to consider whether in forming the review of this local plan a new standalone policy for the Lancaster Canal and/or blue infrastructure could assist in securing key objectives. The Trust would be happy to assist with wording for such a policy should the Council consider this an effective and appropriate way of managing development.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Gavin Rutter
Planning Assistant

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust

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**WYRE COUNCIL REGULATION 18 LOCAL PLAN - FULL REVIEW
REPRESENTATIONS ON BEHALF OF STORY HOMES LIMITED**

Introduction

1. Wyre Council (“the Council”) is currently inviting comments for a full review of its Local Plan which will set out planning policies to guide development across the borough over the next 15 to 20 years. Barton Willmore have been instructed by Story Homes Limited (“our Client”) to prepare initial representations to this consultation process.
2. The scoping consultation for the Regulation 18 Local Plan full review asks interested parties to identify issues that the new Local Plan needs to address, and to identify the evidence required to support the preparation of the new Local Plan. As such, we provide our comments on what approach the Local Plan full review should take to ensure future sustainable growth, with particular emphasis on housing strategy and the need for additional housing allocations.
3. We note that representations were also made on behalf of Story Homes Limited earlier this year to the Regulation 19 Wyre Local Plan partial review where consultation closed on 18th January 2022. Those representations should be read alongside this note.
4. We consider the Council’s decision to consult on both a partial and full review of its Local Plan represents a confusing process for consultees and the general public. It is our view that the Council should instead focus its efforts on undertaking a full review of its Local Plan and to have an aspirational housing strategy for the borough over the next 15 to 20 years.
5. Story Homes Limited is a regional housebuilder based in the North-West, who have participated at all stages of the Local Plan process and its examination previously. They have secured planning permission at ‘Land South of Blackpool Road’ in Poulton-le-Fylde (application reference: 19/00551/FULMAJ) which forms part of the wider allocation for residential development within the adopted Wyre Local Plan (Site SA1/6). The approved scheme also includes an area of land to the south of the allocation which is identified as ‘white land’ within the settlement boundary of Poulton-le-Fylde on the Local Plan Policies Map to potentially accommodate a new primary school.
6. Alongside these representations, our Client is also promoting their land interest that adjoins the above strategically important site which benefits from planning permission. The area of land being promoted via the ‘Call for Sites’ process includes an area of additional ‘white land’ which also abuts site allocation SA1/6 and the Preston-Blackpool railway line. The site represents a

sustainable option for a future housing allocation. A copy of the draft masterplan for the site which is being put forward is enclosed at **Appendix 1** of this note.

7. In essence, the proposal from Story Homes is to seek a moderate extension to the existing allocation at Blackpool Road. This would maximise the potential of this location for residential in a logical and sustainable location.

Approach to Meeting Housing Needs

8. As set out in Barton Willmore's representations in January 2022, we are concerned that the Council is seeking to reduce the overall amount of housing to be delivered in Wyre as part of the partial review of the Local Plan and there does not appear to be any credible evidence to support that strategy.
9. We remind the Council that in undertaking a full review of the Local Plan, the Council must comply with paragraphs 31 to 33 of the National Planning Policy Framework (NPPF) which states:

"31. The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.

32. Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

33. Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local

housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

10. Based on the above, a full review of the Local Plan must be based on up-to-date evidence on housing need to inform future strategic housing policies.
11. We note that the Council’s most recent Authority Monitoring Report (AMR) for the period April 2020–2021 confirms that 605 new homes were provided during the monitoring period which exceeds the adopted Local Plan requirement of 460dpa. The AMR concludes that allocated sites are continuing to come forward across Wyre, with extant permission to deliver 2,460 homes.
12. This demonstrates that there is a strong delivery of new homes and housing allocations identified in the adopted Wyre Local Plan are coming forward as planned; a large number of allocated sites benefit from planning permission. Therefore, it will be important for a full review of the Local Plan to identify new housing allocations in the most sustainable locations to replace existing allocated sites and support future housing growth. The Council must continue its approach to delivery in order to maintain its ‘plan-led’ position and avoid falling short in respect of a 5 year housing land supply.
13. We reiterate from our previous comments to the partial Local Plan review that the Council should take an aspirational approach to the future growth of the borough and not rely on the Government’s Standard Method to calculate a minimum housing need. If the Council was to opt for a reduced housing requirement which aligns with the Standard Method (which should be treated as a minimum starting point to calculate housing need), then it could significantly restrict the growth potential of the borough, as there are less economically active people to meet the job growth in the borough. A ‘cautionary’ (lower level) approach to the future housing strategy is not recommended and it is widely acknowledged that the Standard Method will not deliver the homes the country needs.
14. As such, a full review of the Local Plan should also include a review of the Objectively Assessed Needs (OAN) to calculate its housing requirement so that indicators of economic growth and affordability can inform the housing need. We consider that an aspirational approach towards the housing strategy should be adopted because:
 - Wyre is a ‘growth’ borough both in terms of housing and employment and the Council has a pro-economic growth strategy in its adopted Local Plan and seeks to deliver some 43 hectares of employment land over the plan period 2011-2031.

- The adopted Local Plan housing requirement of 460dpa did not meet the full OAN needs at the time of adoption. The needs were actually higher at 479dpa.
 - There is a strong need for affordable housing in the borough which is a key priority, and the Council derives the majority of affordable housing from Section 106 agreements.
 - The Council is maintaining a job growth strategy of delivering full employment OAN.
15. On the basis of the above, the Council should be planning for housing growth in the borough as part of the Local Plan review to support economic growth by providing homes for economically active people, and to ensure that more affordable homes can be delivered.
16. To achieve this, the new Local Plan does need to allocate additional sites for development.

Allocating our Clients Land to Meet Housing Needs

17. To support the level of growth in the new Local Plan, it will be crucial for new sites to be identified in the most sustainable locations.
18. Poulton-le-Fylde is one of the largest and most sustainable settlements within the Wyre Borough. As such, the Council should distribute a suitable amount of growth by allocating sustainable sites for future development in this area.
19. Our client's land interest in Poulton-le-Fylde represents a sustainable option for a future housing allocation and is being put forward through the 'Call for Sites process'. It is simply a logical extension to the existing allocation.
20. The site extends to 7.7 hectares and is not subject to any allocations or designations. The site can accommodate approximately 185 new dwellings, together with an area of open space for residents to enjoy, new planting, and Sustainable Urban Drainage Systems (SUDS) which will enhance the ecological benefits of the site.
21. As discussed above, the site has a clear physical relationship with the land to the north which benefits from planning permission (19/00551/FULMAJ), and the proposals for the site will integrate with this wider housing allocation. A draft masterplan which illustrates the site boundary in the context of the adjacent extant permission and housing allocation is shown at **Appendix 1** of these representations. Further details of the design rationale are also provided on the draft masterplan and should be read alongside these representations.

22. Access to the site can be obtained from the north through the scheme approved under permission reference 19/00551/FULMAJ whereby the internal road layout was intentionally designed to facilitate future access opportunities to the wider landholding.
23. In terms of sustainable accessibility, there are two existing local bus services (no. 14 and 24) that operate frequent services from Blackpool Road and Poulton Road to Blackpool, Cleveleys and Fleetwood. Poulton Railway Station is also located circa. 800m from the site which provides regular services to Blackpool, Preston, Manchester, Liverpool and Leeds.
24. Carleton Local Centre and Poulton Town Centre are both located within 1km from the site which provide a full range of day-to-day amenities including supermarkets, doctors' surgeries, banks, pharmacies, public houses, cafes and restaurants, places of worship, primary schools, secondary schools, a college, library, parks, bowling green, village hall, playing pitches and a cricket club.
25. Overall, the site represents a logical extension to the existing allocation (SA1/6) and is well-contained by existing and proposed development to the north and east, and by the Blackpool-Preston railway line to the south.

Conclusions

26. Whilst the NPPF and NPPG introduce the Standard Method, the guidance is clear that this is only a starting point, and a minimum position in any case. Adjustments are needed and a thorough review of the OAN is required as part of the full review of the Local Plan.
27. The full review of the Local Plan should have an aspirational growth strategy for the borough to support healthy economic growth, and the delivery of much needed market and affordable homes.
28. To support this growth, additional allocations will need to be identified as part of the Local Plan review as many of the Council's existing allocations now benefit from extant planning permission.
29. Our client's land interest in Poulton-le-Fylde is a sustainable and logical option for a future housing allocation as part of the Local Plan full review. As such, our client is submitting the site as part of the 'Call for Sites' process in parallel to these representations.

BARTON WILLMORE

08/03/2022



Planning Policy
Wyre Borough Council,
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

8 March 2022

Dear Sir/Madam,

WYRE LOCAL PLAN (REGULATION 18) CONSULTATION AND CALL FOR SITES

We write on behalf of our client, Karlin Fleetwood Limited, in response to Wyre Borough Council's Regulation 18 Local Plan consultation as well as the Call for Sites consultation. We understand that this is the first stage of preparing a full review of the Local Plan which will set out planning policies that will guide the future pattern of development and investment in the borough in the next 20 years.

We set out representations below on behalf of Karlin Fleetwood Limited as long leaseholders of Affinity Lancashire outlet shopping destination in Fleetwood. A site location plan, outlining the boundary of the site accompanies these representations.

Affinity Lancashire

Affinity Lancashire, previously known as Freeport Fleetwood, is a well-known and well-established retail and leisure outlet located on the edge of Fleetwood town centre, adjacent to the Fleetwood marina. Affinity Lancashire has a long history of being an established retail destination, with the retail outlet being first granted in 1994. Various applications have been approved since then in relation to the provision of additional retail and leisure units and the refurbishment and modernisation of shopfronts.

Affinity Lancashire comprises over 40 retail outlets offering discounted prices for its customers and includes a range of fashion, footwear, gifts, homeware and accessories, serving both local residents of Fleetwood and the surrounding area.

The site is within a sustainable and accessible location with existing transport infrastructure which allows shoppers to visit the retail outlet via foot, car, train, tram and bus. The nearest train station is Poulton-le-Fylde and shoppers can then reach Affinity Lancashire by a connecting bus. In addition, the tramway runs along the coast from Blackpool to Fleetwood, stopping a 5-minute walk away from the retail outlet. In terms of parking, Affinity Lancashire benefits from an associated car park which includes over 700 free car parking spaces and 10 coach parking spaces.



Key Site Constraints and Designations

The site is in Flood Zone 1 and 2, meaning there is minimal to moderate risk of flooding in the area.

There are no statutory or locally listed buildings on the site nor in the immediate surrounding area. The site is not located within a conservation area.

According to Wyre Council's adopted planning policies map, the site is located within the following designations:

- Within an 'Mixed Use Development' site allocation (Policy SA3/1);
- Within the Fleetwood settlement boundary; and
- Partly allocated as Wyre's Green Infrastructure.

Development Potential

Affinity Lancashire is situated on existing brownfield land within the urban area, and therefore is suitable to be allocated for retail and leisure development.

At present, the site is part of the wider site allocation Policy SA3/1 of the Wyre Local Plan (2019) which is allocated for housing, non-retail commercial, leisure, tourism and employment uses. As a well-established and long-standing retail outlet, however, Affinity Lancashire is somewhat at odds with its existing site allocation. Therefore, in order for Affinity Lancashire to continue to thrive as a retail destination, it should be fully recognised as a retail, leisure and tourism destination and should be allocated as such within the emerging local plan.

Over the last few years, the retail market has seen considerable and significant change as a result of online shopping. These issues have been further compounded by the recent Covid-19 pandemic, forcing retailers to close their stores for a prolonged period of time and increasing consumers' reliance on online shopping. Looking at Affinity Lancashire in particular, the retail outlet has been unable to avoid these impacts, and there has been a reduction in demand from retailers, which has led to an increased number of voids.

However, the retail market has seen a shift in increased demand from customers and occupiers for more experiential destinations together with leisure pursuits. Affinity Lancashire's position in a popular tourist area, located close to Fleetwood town centre, provides an opportunity to take advantage of its destination and consider a wider mix of uses to sit alongside the more traditional retail offer to attract customers.

Therefore, we request that the site allocation allows for sufficient flexibility for retail, leisure and tourism uses on the site to help secure the retail outlet's future and in turn help stimulate economic development in Fleetwood.

Summary

These representations confirm that Affinity Lancashire is a brownfield site that is suitable, available and achievable for retail and leisure development. Karlin Fleetwood Limited are committed to continuing Affinity Lancashire's reputation as an established retail and leisure destination, providing an experiential shopping experience.

We would seek to work collaboratively with the Council on any of the points raised in these representations and request that the above changes are taken into account before any future consultation of the Draft Local Plan.



We trust that these representations will be taken into consideration by the Council. If you wish to discuss any of the comments made in further detail, please do not hesitate to contact us.

Yours faithfully

Louise Bending
Associate Director

Enc : Completed Call for Sites form & site location plan

Planning Policy,
Civic Centre,
Breck Road,
Poulton-le-Fylde,
FY6 7PU

Gladman House
Alexandria Way
Congleton
CW12 1LB

By email only: planning.policy@wyre.gov.uk

Date: 8th March 2022

Re: Wyre Council Local Plan Full Review Scoping Consultation

Dear Planning Policy Team,

This letter is submitted in response to the current consultation held by Wyre Council in relation to the Scoping stage of the Local Plan Full Review. At this stage of the plan making process, Gladman only have a few specific comments to make.

Housing Needs

The new Local Plan will set out policies to guide the future pattern of development in the borough over the 15 to 20 years. The Council have opted to ask the community and other stakeholders on their views on the scope of the full review and to identify issues which the plan should address. This consultation follows the Regulation 19 consultation on the Wyre Local Plan Partial Review which closed in January 2022. The partial review was founded on the basis of Policy LPR1 which had an objective of meeting the full Objectively Assessed Housing Needs (OAHN) within the plan period as advised by the Plan Inspector. It was predicated through Policy LPR1 that the review would address the following:

- 1) An update of Objectively Assessed Housing Needs;
- 2) A review of transport and highway issues;
- 3) Allocation of sites to meet the full OAHN accounting for 2.

Rather than fully updating the OAHN the Council have considered that the partial review would employ the local housing need as calculated through the standard method as the Local Plan housing requirement. It has been considered that there is no justification to uplift the local housing need figure to account for demographic, market signals and economic evidence as the approach set through the standard method accounts for these factors.

The PPG is clear that the standard method for assessing local housing need provides a minimum starting point in determining the local housing needed in an area and does not attempt to understand factors such as economic circumstances or other demographic behaviours¹. The PPG provides further examples where it may be appropriate for authorities to plan for more than the local housing need figure including growth strategies, strategic infrastructure improvements and unmet need but it is clear that is not an exhaustive list.



Gladman consider that the Council should take the opportunity through the Local Plan Full Review to undertake a comprehensive assessment of the strategic housing needs of the borough including the implications of market signals, economic and employment growth and an affordability analysis. It is reminded that the local housing need figure as calculated using the Standard Method represents the minimum need for housing only and the Council should seek to positively plan for needs and align with national ambitions for boosting the supply of new homes.

Duty to Cooperate

The Duty to Cooperate is a legal requirement for local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.

Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, the councils must be able to demonstrate that they have engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs.

The constrained nature of Wyre and previous requests for assistance to meet housing needs arising in the borough means that the strategic cross boundary matters are particularly pertinent through the process of preparing the Local Plan Full Review. It is therefore vitally important that transparent evidence is provided to demonstrate that plans are being prepared positively to ensure that policy frameworks are put in place to address the housing and employment needs of the wider area in full. The Duty to Cooperate is central to this and therefore robust evidence is required to underpin any associated position statements or statements of common ground.

Conclusion

Gladman welcome the opportunity to comment on the initial scoping consultation for the Wyre Council Local Plan Full Review and we politely request to be kept up to date on the progress of this document moving forwards. I hope you have found these representations to be constructive and should you wish to discuss any of the points raised in detail, please do not hesitate to contact a member of the Gladman team.

Yours Faithfully,

Josh Plant

Promotion and Policy Planner



Contact:

Date:

08 March 2022

Dear Wyre Local Planning Authority,

Thank you for consulting Lancashire County Council (LCC) as Lead Local Flood Authority (LLFA) on the full review of the Wyre Local Plan (2011-2031).

Under the Flood and Water Management Act 2010 the LLFA is the responsible 'risk management authority' for managing 'local' flood risk which refers to flood risk from surface water, groundwater or from ordinary watercourses. The LLFA is a statutory consultee for major developments with surface water drainage, under the Town and Country Planning (Development Management Procedure) (England) Order 2015. While the LLFA is not a statutory consultee in the plan-making process, we value the opportunity to provide comments from the perspective of our statutory roles.

Comments provided in this representation are advisory and it is the decision of the Local Planning Authority (LPA) whether any such recommendations are acted upon. The comments given have been composed based on the current extent of the knowledge of the LLFA and information provided with the consultation at the time of this response.

It is crucial that the Local Planning Authority (LPA) provides clear policies and guidance on flood risk and surface water issues in order to deliver developments that are safe and sustainable. The LLFA strongly advises the LPA to review the Local Plan to ensure that it is in line with current policies, such as the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) and Defra Technical Standards for Sustainable Drainage Systems (SuDS).

Please see our comments below on the current Local Plan for Wyre. These comments do not cover the totality of our position but are provided in order to give examples of our current thought process and to demonstrate what the LLFA recommends for inclusion / improvement within the review of the Wyre Local Plan. The LLFA would welcome a meeting with the LPA and any other relevant flood risk management authorities to further discuss the points above and the content of the local policy in order to promote more robust policies relating to surface water flood risk management and sustainable drainage on developments.

General Comments

1. The LPA should consider revising the language used throughout the document to better match current policy documents (such as the NPPF and PPG). For example, the document references "Green infrastructure" on several occasions (such as section 6.5.2) – this could be revised to "Blue-Green infrastructure", which would help to promote Blue-Green SuDS into high quality place making.
2. Natural Flood Management (NFM) is now included within the NPPF and should be referenced within the Local Plan. Please note that NFM should not be confused with SuDS, as they are distinct and entirely separate concepts. SuDS solely serve the development on-site and must be designed to comply with the relevant policies, guidance and standards set out nationally and locally. NFM can be provided in addition to SuDS, for example upstream of a development to slow the flow of water into a development, but it is NOT a replacement for SuDS. Wyre LPA is encouraged to seek further advice from the Environment Agency on NFM who are best placed to advise further on this.
3. Where appropriate, the LPA should consider specifying land to be safeguarded for current or future flood risk management within the Local Plan, in line with Paragraph 161 of the NPPF.
4. The Local Plan should make specific reference to the inclusion of treatment trains, biodiversity net gain and blue-green infrastructure. This would promote higher quality SuDS that meet the "four pillars", as set out in The SuDS Manual.
5. The Local Plan should specify the requirement for an allowance to be made for urban creep. A 10% increase in paved surface area is recommended in line with The SuDS Manual.
6. The Local Plan should specify the requirement for an allowance to be made for climate change in line with the published [climate change allowances](#) on gov.uk.
7. Given the low-lying topography of Wyre, the LLFA recommends that the Local Plan should include a requirement that evidence of a free-running receiving watercourse should be provided for all developments that seek to discharge surface water into a watercourse, whether that be a 'main river' or an 'ordinary' watercourse. Where this is not possible, developers should be required to provide a specified allowance for a surcharged outfall over the calculated discharge rate for each development site.
8. The Local Plan should include a requirement for an 8-metre easement from the near bank of each watercourse (open or culverted) to secure access for

future maintenance should the watercourse ever need to be repaired, replaced or upgraded.

9. The Local Plan should include a requirement to avoid and minimise culverting watercourses wherever possible and should seek to promote daylighting of culverts where possible, as well as the requirement to seek permission to alter or carry out works to a watercourse or water body from the relevant body (LCC LLFA for ordinary watercourses, Environment Agency for main rivers, Canal and Rivers Trust for any canals).

Comments on Policy CDMP2

1. Section 1 should include the Lancashire Local Flood Risk Management Strategy within the list of relevant plans and strategies.
2. Section 5 states that major developments should implement SuDS "utilising lower lying land within the site". This wording should be revised as it implies that end-of-pipe SuDS components are encouraged through the Local Plan, which is contrary to the advice included within The SuDS Manual.
3. Section 6 states that developments will need to achieve greenfield runoff rates and to comply with the drainage hierarchy "where possible". This wording includes "where possible" as a qualifying statement, which is unnecessary as greenfield runoff rates and the implementation of the hierarchy of drainage options are required by the NPPF and PPG. This paragraph should also clarify that greenfield runoff rates cover runoff from the entire development site area, not just the impermeable areas within the site.
4. Section 6 i) needs to be updated to be in line with the Defra Technical Standards for SuDS, the Design and Construction Guidance (DCG) for Sewers and The SuDS Manual, although this is primarily a concern for United Utilities who you may wish to consult further with on this point. You can find more information on their website here: <https://www.unitedutilities.com/builders-developers/larger-developments/wastewater/sustainable-drainage-systems/>
5. Section 8 should specify that all surface water sustainable drainage systems should be designed to SuDS adoptable standards in accordance with The SuDS Manual.
6. Sections 6 and 8 refer to "critical drainage areas", identified in the Strategic Flood Risk Assessment Level 2. The LPA should confirm through consultation with the Environment Agency that this classification is still appropriate. The LLFA is unaware of any 'critical drainage areas' formally designated by the Environment Agency in Wyre but does understand that the Environment Agency no longer designates any new critical drainage areas or areas with 'critical drainage problems'. If there are no 'critical drainage areas' formally

designated by the Environment Agency, then the LPA is advised to consider using different or updated terminology to avoid confusion as to their status and any subsequent requirements e.g., through the NPPF etc. Lancaster City Council LPA have recently undertaken a similar review of their Local Plan and have reviewed what were previously called 'critical drainage areas' to avoid such confusion.

7. Footnotes 27 and 31 are redundant and need to be removed.

Comments on other Policies

8. CDMP4 should include a requirement for a SuDS treatment train to be included within the SuDS design in accordance with The SuDS Manual.
9. CDMP4 should include a requirement for an 8-metre easement from the top of the bank of each watercourse (open or culverted) to secure access for future maintenance should the watercourse ever need to be repaired, replaced or upgraded.
10. CDMP4 should include a requirement to avoid and minimise culverting watercourses wherever possible and should seek to promote daylighting of culverts where possible, as well as the requirement to seek permission to alter or carry out works to a watercourse or water body from the relevant body (LCC LLFA for ordinary watercourses, Environment Agency for main rivers, Canal and Rivers Trust for any canals).

I trust you find this response helpful and constructive. If you have any questions or wish to discuss any aspects of the response further, please do not hesitate to contact the LLFA using the details at the top of this response.

Yours faithfully,

Benjamin Rogers
Lead Local Flood Authority



Homes England

Planning Policy,
Civic Centre,
Breck Road,
Poulton-le-Fylde,
FY6 7PU

By email: planning.policy@wyre.gov.uk

9th March 2022

Dear Sir / Madam,

Wyre Local Plan Full Review Scoping Consultation and Call for Sites

Homes England Response

As a prescribed body, we would firstly like to thank you for the opportunity to comment on the above consultation.

Homes England is the government's housing accelerator. We have the appetite, influence, expertise, and resources to drive positive market change. By releasing more land to developers who want to make a difference, we're making possible the new homes England needs, helping to improve neighbourhoods and grow communities.

Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.

Yours faithfully,

P.P Nicola Elsworth
Head of Planning and Enabling

Homes England
1st Floor Churchgate House
56 Oxford Street
Manchester
M1 6EU

Please send all Local Plan and related consultations to
nwlocalplanconsultat@homesengland.gov.uk

0300 1234 500
www.gov.uk/homes-england

OFFICIAL

Riley, Fiona

Subject: FW: Wyre Council Local Plan Full Review - Regulation 18 Stage - Scoping
Attachments: CIL and Planning Obligations Advice Note [Nov 2018].pdf

From: Christopher Carroll <
Sent: 09 March 2022 15:46
To: Policy, Planning <Planning.Policy@wyre.gov.uk>
Subject: Wyre Council Local Plan Full Review - Regulation 18 Stage - Scoping

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Do not click any links or open attachments unless you know the content is safe.
Never disclose your user details or password to anyone.

Good afternoon,

Thank you for giving Sport England the opportunity to comment.

The protection of existing sports facilities and access to natural resources used for sport is vital for its continued development. It's also important for the overall quality of life and protection of the environment. However, as sport is a relatively low value land use, sports facilities are often under pressure from other forms of development.

By promoting a forward planning approach to the provision of facilities and opportunities to participate in sport, we add value to the work of others and help to deliver sustainable development goals. We achieve this through:

- Recognising and taking full advantage of the unique role of sport and physical activity in contributing to a wide array of policy and community aspirations, including leisure, health, and education
- Using sport and activity as a fundamental part of the planning and delivery of sustainable communities
- The development of partnership working using sport and active recreation as a common interest.

Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. It is essential therefore that the Local Plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to paragraphs 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=8AlgRekRYFhcpRnjA2ybTCY4mO6Nei3L_mnb8m_6Byo51Wj3lgARlqqcthzp4AXcqS93s8HF0R00EA_ryY2U25PTccfUIWzzM31y02cZU_PvTOrkfzhGwdJo3Br6-ee95R6At3M7VWvqi_LGtwRVND_6awldt3lkjhehjAMxbE7uf3OG37KEsI4H0gg0Obs3NGU9ZbPb2_B7coP_XxscNdkqDF0nTzkMApLYZM0DezcuHgZjvLwUiwOMtBil40xs6kAYtH8xqh_FYDVLcc6U4TvwPF9TblePvnC8LCPIbwQ6AldM5McbBhYCzA5WpjDU_Rt1BOeUzaz-vnBQcl6slw

In accordance with paragraph 187 of the NPPF, it is important that consideration is given as to the location of existing and proposed playing fields and outdoor sports facilities in relation to proposed residential developments to ensure that there is no prejudicial impact, with regards to noise, ball strike and artificial lighting. Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=qNP0kF7XfUAY2M4jmCn26grSNAXRRQYV_Cx5OxWmXe5Aj5dXkv9RMfdHyTbzQBt4I4KIZODFJrLVAzfoKtuFpbdSzpdIOxWEYahgTcHDCvjJWJa0cLj8IACLFk10Er71V5gyzliGHtIx0TobiXkUsSXxKSqZ2RFukVvmv2ni-

[n3exSVXL01LQZceGKM7wGaKVDkOgkm5gKMHpLRIP8sgUyWyNOubD7uHO-SVOC5RjchvNZteL99oMeTzWnqxh538DMORBBGmQp7jpwDQ6pJM5LU8wE4y2tYfJ90-kxy9jZVyiNtAVIL-DeAJSe9hIPUnRik3GTbkL-JTI73a03Mg](https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=0hBOE9FmXg8T0B1-1_jD_qCTABY05KcOglVm12L7YzZySyOgthwsGnjnT168fbTUXOanZVBdzMW0nLtNzpjAWLgULpf-doOSTN-s9efTWiQdGrQnw5F17KMFEKWuAkL3LddSzwLiC033aQI5NZTcLYTm7h3-vdcBpgTaLwWtW6ciP6hF_LDrmpkPeG98aX7_bXTV3O38rXByZCMQIQfVAXh-Le8jaa38tZlo8RNV0v0-UicZnG8gUoeaYsDpmXmexjB6xz4hsgHi9DsJQ9IV2JmyqWhBycN3QcgFCSCISdrDO3uGawJiLk4d2vWV1fDSVD11zaNe--xuZDFJqtyrJX6bd5jaGEgJBRkCYCChdTXz0sX3b5w-STPnmzv9WW)

In line with the Government's National Planning Policy Framework (paragraph 98) we advocate that at the core of planning for sport should be a robust and up-to-date assessment of the needs for sport and recreational facilities as well as opportunities for new provision. Guidance on how to prepare a Playing Pitch Strategy and Built Facilities Strategy can be found on our website:

https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=0hBOE9FmXg8T0B1-1_jD_qCTABY05KcOglVm12L7YzZySyOgthwsGnjnT168fbTUXOanZVBdzMW0nLtNzpjAWLgULpf-doOSTN-s9efTWiQdGrQnw5F17KMFEKWuAkL3LddSzwLiC033aQI5NZTcLYTm7h3-vdcBpgTaLwWtW6ciP6hF_LDrmpkPeG98aX7_bXTV3O38rXByZCMQIQfVAXh-Le8jaa38tZlo8RNV0v0-UicZnG8gUoeaYsDpmXmexjB6xz4hsgHi9DsJQ9IV2JmyqWhBycN3QcgFCSCISdrDO3uGawJiLk4d2vWV1fDSVD11zaNe--xuZDFJqtyrJX6bd5jaGEgJBRkCYCChdTXz0sX3b5w-STPnmzv9WW

The results of the assessment should be developed into a clear strategy for meeting the identified needs, integrated into forward planning and applied within development management. By doing so, the planning system will be able to meet the requirements of the NPPF, secure the considerable benefits that positive planning for sport can provide, and help to meet our planning objectives. Additionally, it is recommended that the Council use Active Places Power, which is an interactive mapping and reporting tool provided by Sport England for those delivering community sport. The web tool facilitates the strategic planning of sport provision through advanced analytical tools that reference the most authoritative sport facility database within the country, which can be found following this weblink:

https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=5V9xed7dOyikDjyZ6TeQJoZsQ3cVRKwJpewhrpOdrumB0mXjB2zVOi9KNZsaD9A7pmEzBESsh44D7cTu5Z9o-rn2wpVxvFD6IOEpBlv_BVqHo-L-aphMQRn8v355NZkV2VnA-X5omOAX_7Gc3-h0d0WVvu_J6iaPOt795I_sdPiqx8SsaYLhHqecOgNvom5ILSyIkmiZO_sN-raEvz3V7MNSm1lnRBhTw6B56T3PBxu4

Active Places Power is a website to help those involved in providing sport provision with a series of tools to guide investment decisions and develop sport provision strategies.

It should be noted Sport England consider **local standards are not appropriate for outdoor sports** because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court/pitch ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports ranges from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space. The use of generic standards such as this for securing provision in new development would not fully satisfy the CIL Regulation 122 tests. Sport England has prepared an advice note on this matter, see attached.

As such, it is recommended that any Local Plan have a separate outdoor sports policy and indoor sports policy that secures the necessary money into sport for major housing developments, supported and justified by a robust and up-to date evidence base.

Planning objectives

In practice, our planning objectives are to:

1. Protect existing facilities: We seek to help protect sports and recreational buildings and land including playing fields. We expect these to be retained or enhanced as part of any redevelopment unless an assessment has demonstrated that there is an excess of provision and they are surplus to requirements, or clear evidence supports their relocation. We are a statutory consultee on all planning applications affecting playing field land and will object to such an application unless one of five exceptions applies.
2. Enhance the quality, accessibility and management of existing facilities: We wish to see the best use made of existing sports facilities through improving their quality, access and management. We have developed a wide

range of supporting advice on understanding and planning for facility provision, including efficient facility management such as community access to school sites.

3. Provide new facilities to meet demand: We seek to ensure that communities have access to sufficient high quality sports facilities that are fit for purpose. Using evidence and advocacy, we help to guide investment into new facilities and the expansion of existing ones to meet new demands that cannot be met by existing provision.

Each of the objectives above should be embodied within relevant Local Plan policies. Sport England has a Planning for Sport which can assist with the development of policies:

https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=Fv5BqKeCWJ3GuPmaGc2Ti7jBljOIddpQdUCpAmnJWYZcQC5nN9aiWCALcl8kNcFjV0-FNi6L5iF1ckNcW3OM4pZz9IsNSLH90TtY774-IyOgjLUUMWw- -IUS_nH5GFM8KM6iltN8iDw1mT3LDIGQ1gBCUxxqk7yrRplCXBCDUZ4oOefy0UVKShQHTFPRIn4FK8SkcHhWW6x94OaLWxCRCcCbiRAuobCbFgt2QT_v1YGzKIPB31KCDqpEMeGt-eLLGXFaY3PUzD4qRor11gqffzf1T17UOasXfDIWKGyotUSJXyjk8UJAjmelSfCR9J8YRuazDToxWWPgeE7Gkx0Q

Uniting the Movement and Active Design

Sport England have a new strategy, 'Uniting the Movement' which is our 10-year vision to transform lives and communities through sport and physical activity. As we adapt and rebuild from the huge disruption caused by the coronavirus pandemic, we need to collectively reimagine how we keep movement, sport and activity central to the lives of everyone. Because if we harness its power, we'll be able to improve people's lives in so many ways. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. This strategy is different not just because it's a vision for the next 10 years. It sets how we need to change as a sector and an ecosystem, so that we can give people the opportunities they need now and in the future. More than anything, it seeks to tackle the inequalities we've long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important.

Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity are:

1. Recover and reinvent
2. Connecting communities
3. Positive experiences for children and young people
4. Connecting with health and wellbeing
5. Active environments

It is believed that the Local Plan Review offers the opportunity to help address these issues. Please see weblink for further information - https://url6.mailanyone.net/v1/?m=1nRyVw-0002TS-4s&i=57e1b682&c=GAcpn0EnFEovsIA_3dk6csb2jA6ovKhCfKq6iugeSfQg53YXquE3QB7nO8Gk8IBI7GMG2Y8vVI44cJIF_EsIk5gvT7vO_HZNX6QW3WR8_Kre22_Bgnt4JJfyy_sYak59xAd2Xswkjz9FGXsMApWGPO5MaUh9RBdcinEuzTmn2kMbOvDlIt_XZL-PQk6MCwNt8vylZ_KHc6HxO1CafkJsQVvKQ3mgDCOZ1e-lKfit6D1lRn445vcwsQkWYVmrYyfnD1U9-0E6SwSu8P6HwqE4sVVQ

Active Design

To help tackle the 'Active environments' issue, Sport England have produced the 'Active Design' guidance and accompanying checklist, in partnership with Public Health England. Like other councils who are currently writing their Local Plans, we would strongly encourage you to embrace the concept of Active Design as Sport England believes that being active should be an intrinsic part of everyone's life pattern. Furthermore, Sport England believe that the incorporation of Active Design within the Local Plan will create high quality and resilient built environments that will also help promote a modal shift to sustainable travel measures, thus helping to address the Council's climate change emergency declaration.

The master planning of major new housing and mixed use development schemes has a vital role in providing easy access to a choice of opportunities for sport and physical activity, making new communities more active and healthy. Active Design is aimed at urban designers, master planners and the architects of our new communities. It is an innovative set

of design guidelines to promote opportunities for sport and physical activity in the design and layout of development. The guidance promotes sport and activity through three key Active Design principles of - improving accessibility, enhancing amenity and increasing awareness (see link below for more information)

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If you have any queries or require assistance with the preparation of Sports Evidence Base please contact the undersigned.

Kind Regards,

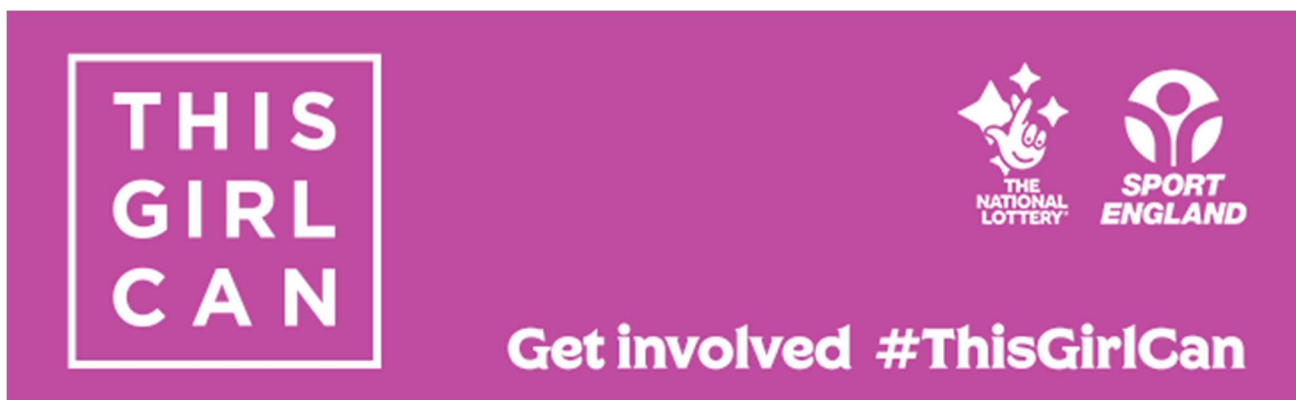
Christopher Carroll
Planning Manager

M: xxxxxxxx

E: xxxxxxxx



WINNER



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)



Mr S Smith
Planning Policy and Economic Development Manager
Wyre Council
Civic Centre, Breck Road
Poulton-le-Fylde FY6 7PU

Our Ref: Wyre reg 18
Your Ref:
Please Ask For: Mark Evans
Telephone:
Email:
Date: 09 March 2022

Dear Steve

Wyre Local Plan Full Review Scoping Consultation

Thank you for inviting Fylde Council to comment on the scope of the Wyre Local Plan Full Review. The two councils have maintained dialogue and engagement concerning the progress of our respective partial reviews through the Fylde Coast Duty to Co-operate meetings and through direct engagement between officers, through the governance provided by the Duty to Co-operate Memorandum of Understanding between the Fylde Coast Authorities and Lancashire County Council. We will continue to work with you in relation to cross-boundary strategic matters in support of your Full Review.

It is recognised that the scope and content of the Full Review is not determined at this stage. Fylde Council does not wish to offer specific comments on the scope of matters that Wyre Council may wish to include in the Full Review. We will be happy to engage further as the overall form and scope of the Full Review develops.

Where any proposed policy or plan content relates to cross-boundary strategic matters, Fylde Council would appreciate Wyre Council bringing the matter forward for discussion, in advance of the final policy development. This can be achieved via the Fylde Coast Duty to Co-operate meetings established through the Memorandum of Understanding. Any final content should have regard to the outcomes from those discussions.

We look forward to the publication of the Wyre Local Plan Full Review in due course. Fylde Council would appreciate if any draft of content of the Full Review that concerns strategic cross-boundary matters could be shared in advance of publication, as this will assist early agreement of the statement of common ground.

Should you have any queries regarding the above, please do not hesitate to contact me.

Yours faithfully

Mark Evans
Chief Planning Officer

Dear Sir or Madam,

Wyre Local Plan: Reg 18 Consultation

Thank you for consulting the Council on the above planning document. I provide the following comments and hope they are of assistance.

Historic Environment

I would be grateful if you could remind the Borough Council of the following provisions which are included in the Borough Council's Service Level Agreement with the County Council's Historic Environment Team for the Provision of Specialist Archaeological Advice to Wyre Council, 2021-24 (copy attached), and mean that the HET can provide a level of input into the Local Plan process at no extra cost to the Borough Council, namely those in 1.2.Local Plans:

- 1.2.1. The County Council will provide upon request advice on the formulation of Local Plan policies and guidance relating to the historic environment.
- 1.2.2. The County Council will upon request provide advice and information on the identification of local sites of heritage interest in a district context insofar as resources and existing databases allow.
- 1.2.3. The County Council will upon request identify heritage assets within areas defined in site allocation documents or similar where there may be heritage implications for a change of use or its development insofar as resources and existing databases allow. An outline recommendation for further investigations that may be required will be provided where relevant, but the County Council will not provide a detailed and specific assessment of the heritage value or significance of any heritage asset so identified unless a separate and specific costed agreement is reached for that work.

The provisions of 1.2.3 are such that the HET can provide a initial broad-brush assessment of any proposed allocations sites in the form of a traffic light system where the sites would be graded, green – no archaeological interest, amber – an archaeological interest that could be addressed through the planning process, red – the site has a known (or potential) archaeological interest that is or might be a constraint on the allocation in its current form, and the site should not therefore go forward for allocation until the nature and extent of the constraint is better known (the

site has been subject to some archaeological evaluation). Information required by the HET from the Borough Council to fulfil the provisions of 1.2.3 would include a complete list of all proposed site allocations, 8-figure NGR for each site and a red-line boundary location plan for each site in the form of a shape file or pdf.

I would also like to draw the Borough Council's attention to the following guidance produced by Historic England:

- Historic Environment Good Practice Advice in Planning 1: The Historic Environment in Local Plans (HE 2015)
- Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans (HE 2015)
- Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (HE 2019).

Economic Development and Housing

The evidence base informing the Independent Economic Review for Lancashire and the accompanying Environment Commission work should form part of the underpinning evidence for amending housing figures as part of the review. As key findings from the work are considered by Lancashire Leaders and future priorities agreed, the policy direction of Local Plans should support these as appropriate. Investment and funding opportunities that are identified in response to this, and the Levelling Up White Paper will also need to align with and be supported by a strong spatial policy framework. Also as Wyre Borough Council have declared a Climate Emergency it would be worthwhile to consider referencing Climate Change and Net Zero Carbon policies as a growth industry and linking some of these policies into the new Local Plan.

Public Health

Within the National Planning Policy Framework (NPPF, 2021) guidance is provided on how health should be considered by the planning system. As part of the delivery of the social dimension of sustainable development, planning has a role in supporting and developing strong, vibrant, and healthy communities.

One of the core planning principles that underpin both plan-making and decision-taking is for planning to "enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling." (paragraph 92, point c) NPPF).

There is also the requirement to "create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users" (paragraph 130, point f) NPPF). This is accompanied by footnote 49 which states "Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties."

It is with this National Planning Policy Framework guidance in mind that we make the following recommendations.

Hot Food Takeaways

Being overweight or obese can affect both a person's physical health, increasing their risk of developing many life-threatening conditions such as cancer, Type 2 diabetes, and heart disease; and their mental health, being linked to high rates of depression and anxiety.

As such, it has been estimated that cost to society for obesity related conditions is £27 billion per year. This is an issue across all age groups within Wyre, with 23% of four-year-olds, 34% of 11-year-olds and 63% of adults being classified as overweight or obese.

Evidence shows there is strong link between the number of hot food takeaways in an area and the level of obesity due to the unhealthy nature of the food sold by these establishments (See attached advisory note). The number of takeaways in Wyre has increased in recent years, with a percentage increase of 11% between 2014-2018; meaning it is becoming easier to access hot food takeaways.

Furthermore, there are stark health inequalities between the least and most deprived individuals when it comes to obesity. For example, across Lancashire, 23% of 11-year-olds are obese in the most deprived 20% of the population compared to 15% of the least deprived. This inequality stretches further including affecting the food environment individuals are exposed to; 53% of all takeaways in Lancashire fall within the most deprived areas of the communities compared to just 6% in the least.

Whilst obesity is complex issue, limiting an individual's exposure to hot food takeaways would help in preventing the rising obesity rates seen within Wyre. We therefore make the following recommendations and request that they are included within the scope of the Local Plan review:

1. Refusing new Sui Generis Hot Food Takeaway uses within wards where 10% or more of reception pupils or 15% or more of year 6 pupils are classed as obese

Rationale: Achieving the Governments goal of halving obesity would mean reducing reception obesity to 5%, and year 6 obesity to 10% - the percentage triggers proposed are 5% above this target for each year group.

2. Refusing new Sui Generis Hot Food Takeaway uses within wards which fall within the 20% most deprived areas in England i.e. deprivation quintile 1

Rationale: Both obesity and hot food takeaway prevalence is significantly higher in the most deprived quintile compared to the least. Preventing further hot food takeaways in these areas would help address health inequalities by limiting exposure to an unhealthy food environment.

3. A 400m restriction zone for Sui Generis Hot Food Takeaway use surrounding secondary schools

Rationale: 400m provides a 10-minute walking distance around a school. Stopping new facilities opening, or limiting their opening times, will reduce the accessibility of hot food to school pupils during lunchtimes and immediately after school.

For more information, data, and evidence about the link between hot food takeaways and obesity, please see the attached Public Health Advisory Note – Hot Food Takeaways.

Adaptable Homes

Where we live plays an enormous part in our health and wellbeing. Living in a home where we feel comfortable and is safe and secure allows us to prosper. The World Health Organisation stated "Improved housing conditions can save lives, prevent disease, increase quality of life, reduce poverty, and help mitigate climate change. Housing is becoming increasingly important to health in light of urban growth, ageing populations and climate change."

The requirements for all new homes are laid out in Approved Document M Volume 1 – Access to and use of buildings. This document outlines three types of dwelling:

- M4(1) Category 1: Visitable Dwellings – Mandatory
- M4(2) Category 2: Accessible and Adaptable Dwellings – Optional
- M4(3) Category 3: Wheelchair User Dwellings – Optional

M4(1) is the minimum standard that all new homes must be built to, and it allows for someone in a wheelchair to visit a property. M4(2) standards go beyond this and requires homes to be built home in such a way that it can be adapted should the need arise. M4(3) is a further standard specific for wheelchair users.

Building to an adaptable standard is known as Mainstream Accessible housing, defined as is "housing that is not age-specific but with design criteria that ensure accessibility and inclusivity to promote better living among all ages." Research shows this a popular concept amongst the vast majority (72%) of the population.

There is a clear need for homes of this kind within Wyre and this is need goes beyond accommodating for the housing needs of older people. Adaptable homes make dwellings usable by a wide range of householders, from families with young children to older less agile people and anyone living with a mobility impairment whether temporarily or on a longer-term basis:

- The Office for National Statistics estimated that in 2020 27.9% of Wyre's population was 65 or over, this is predicted to increase to 36.0% by 2040.
- In Wyre 23.5% of working age people were disabled between April 2020-March 2021.
- Appropriate housing has a big impact on whether a disabled person can work. In Wyre there is an employment gap of 40.9% between working aged disabled people and working aged non-disabled people.
- 4.3% of the population in Wyre is children under 5 whose families are likely to benefit from the greater space that M4(2) dwellings offer.

If only a proportion of new homes were built to M4(2) standard in the future, individuals will not have a fair and equal opportunity to live in homes that are adaptable. We want houses that offer a lifetime home and can grow with a person and family as they age. To ensure equity and fairness across the county, we therefore make the following recommendation and request it is included within the scope of the Local Plan review:

100% of all new build homes should be built in accordance with the requirements laid in out in M4(2) Accessible and Adaptable Dwellings unless this is superseded by M4(3) building regulations or other specialist requirements.

For more information, data, and evidence about the link between Housing and Health, please see the attached Public Health Advisory Note – Adaptable M(2) Homes.

Active Design Principles

A lack of physical activity in everyday routines, combined with other lifestyle factors, can lead to poor health outcomes at a population level. As with the issue of excess weight, physical inactivity is a complex problem and a multifaceted approach to addressing it is required.

Active Design principles, developed by Sport England and supported by Public Health England, are intended to create environments that make the active choice the easy and attractive choice for people and communities. The idea being that the design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design Principles:

1. Activity for all

Neighbourhoods, facilities and open spaces should be accessible to all users and should support sport and physical activity across all ages.

Enabling those who want to be active, whilst encouraging those who are inactive to become active.

2. Walkable communities

Homes, schools, shops, community facilities, workplaces, open spaces and sports facilities should be within easy reach of each other.

Creating the conditions for active travel between all locations.

3. Connected walking & cycling routes

All destinations should be connected by a direct, legible and integrated network of walking and cycling routes. Routes must be safe, well lit, overlooked, welcoming,

well maintained, durable and clearly signposted. Active travel (walking and cycling) should be prioritised over other modes of transport.

Prioritising active travel through safe, integrated walking and cycling routes.

4. Co-location of community facilities

The co-location and concentration of retail, community and associated uses to support linked trips should be promoted. A mix of land uses and activities should be promoted that avoid the uniform zoning of large areas to single uses.

Creating multiple reasons to visit a destination, minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity.

5. Network of Multifunctional Open Space

A network of multifunctional open space should be created across all communities (existing and proposed) to support a range of activities including sport, recreational and play and other landscape features including Sustainable Drainage Systems (SuDS), woodland, wildlife habitat and productive landscapes (allotments, orchards).

Facilities for sport, recreation and play should be of an appropriate scale, positioned in prominent locations, co-located with other appropriate uses whilst ensuring appropriate relationships with neighbouring uses.

Providing multifunctional spaces opens up opportunities for sport and physical activity and has numerous wider benefits.

6. High Quality Streets and Spaces

Flexible and durable high quality streets and public spaces should be promoted, employing high quality durable materials, street furniture and signage.

Well-designed streets and spaces support and sustain a broader variety of users and community activities.

7. Appropriate Infrastructure

Supporting infrastructure to enable sport and physical activity to take place should be provided across all contexts including workplaces, sports facilities and public space, to facilitate all forms of activity.

Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.

8. Active Buildings

The internal and external layout, design and use of buildings should promote opportunities for physical activity.

Providing opportunities for activity inside and around buildings.

9. Management, maintenance, monitoring & evaluation

The management, long-term maintenance and viability of sports facilities and public spaces should be considered in their design. Monitoring and evaluation should be used to assess the success of Active Design initiatives and to inform future directions to maximise activity outcomes from design interventions.

A high standard of management, maintenance, monitoring and evaluation is essential to ensure the long-term desired functionality of all spaces.

10. Activity Promotion & Local Champions

Promoting the importance of participation in sport and physical activity as a means of improving health and wellbeing should be supported. Health promotion measures and local champions should be supported to inspire participation in sport and physical activity across neighbourhoods, workplaces and facilities.

Physical measures need to be matched by community and stakeholder ambition, leadership and engagement.

We recommend that the Active Design Principles are included within the scope of the Local Plan review to enable them to be embedded in all future developments.

For more information, data, and evidence about the importance of the Active Design Principles, please see the attached Public Health Advisory Note – Active Design and Spatial Planning.

School Provision

Section 14 of the Education Act 1996 dictates that Lancashire County Council's statutory obligation is to ensure that every child living in Lancashire is able to access a mainstream school place in Lancashire. Some children have Special Educational Needs for which they access school provision outside of Lancashire. Special Educational Needs provision is managed by LCC's SEND Team and is not covered by this response. The School Place Provision Strategy 2022 – 2025 provides the context and policy for school place provision in Lancashire. Over the coming years, Lancashire County Council and local authority partners will need to address a range of issues around school organisation in order to maintain a coherent system that is fit for purpose, stable, and delivering the best possible outcomes for children and young people.

Pressure for additional school places can be created by an increase in the birth rate, new housing developments, greater inward migration and parental choice of one school over another. If local schools are unable to meet the demand of a new development there is the potential to have an adverse impact on the infrastructure of its local community, with children having to travel greater distances to access a school place.

The School Planning Team produces an Education Contribution Methodology document which outlines the Lancashire County Council methodology for assessing

the likely impact of new housing developments on school places, where necessary mitigating the impact, by securing education contributions from developers.

The Department of Education has produced new guidance updated November 2019 'Non-statutory guidance for local authorities planning for education to support housing growth and seeking associated developer contributions, November 2019'. This guidance and its purpose enables the local authority with the education responsibility to evidence the need and demand of school places new housing development will have on community infrastructure, including education

In order to assess the impact of a development the School Planning Team consider demand for places against the capacity of primary schools within 2 miles and secondary schools within 3 miles. These distances are in line with DfE travel to school guidance and Lancashire County Councils Home to School Transport Policy.

Planning obligations will be sought for education places where Lancashire primary schools within 2 miles and/or Lancashire secondary schools within 3 miles of the development are:

- Already over-subscribed,
- Projected to become over-subscribed within 5 years, or
- A development results in demand for a school site to be provided.

It is felt necessary at this time to raise the fact that we still have major issues with securing a school site and a land contribution in Wyre which in turn provides risk to Wyre's Local Plan delivery. The acquisition of land and contribution is detailed in DfE guidance. Clarification is still being sought around what plans if any Wyre have to address the shortfall of places, meeting the funding gap or offering places elsewhere where a school site and land contribution are not secured.

At this moment in time and following our response to the partial review the School Planning Team wish to re-iterate the fact that we work closely with all Lancashire District Councils providing advice and guidance regarding the impact new housing has on the provision of mainstream education. To enable us to forecast the five-year position we rely on the district to provide information of their five-year housing land supply annually. This information is used alongside national statistics such as the birth rate to forecast the likely need for additional school places within a specific planning area. This level of information is provided to the Wyre planning officers as part of the duty to cooperate between the District Councils and upper tier County Council. This information is intended to assist planning officers to plan where housing growth will be and the infrastructure required.

We note that the council is also seeking to know of any sites, land or buildings in Wyre that could have potential for future development, redevelopment or designation. As previously stated in our response to the partial review it is noted that based on the housing evidence the Objectively Assessed Housing Need (OAHN) identifies that the Local Plan seeks to deliver a minimum of 7,232 dwellings within the Local Plan period 2011 – 2031 compared to an assessed supply of 9,423 dwellings – a margin of difference of 2,191 dwellings. The partial review information provides headline figures of new housing, however it does not provide detail of the specific planning areas. At a point in time, it would be appreciated if detailed information could be provided by Wyre of the changes in housing delivery and the specific planning areas. The School Planning Team in return will advise which

specific planning areas require further review and investment of additional pupil places. This level of detail can be applied to the districts Infrastructure Delivery Plan documents advising residents of the level of all infrastructure to meet the demand of new housing.

A new policy has been inserted within the partial review - HP1 Housing Requirement and Supply, required in relation to the revised housing requirement and to accord with policy LPR1. Within this policy it states that 'Between 2011 and 2031, the Local Plan will deliver a minimum of 7,232 net additional dwellings, of which, 5,192 will be on allocated sites in policies SA1, SA3 and SA4'. As above, detail is required of how the 5,192 dwellings will be allocated on the sites SA1, SA3 and SA4.

It is noted from the Statement of Community Involvement that Lancashire County Council including the School Planning Team have been engaged with the council through the preparation of the Local Plan discussing development across the planning areas. The School Planning Team has demonstrated a commitment to working with the district at all levels to ensure information is shared at the appropriate time and provide commentary on housing development and impact on education either face to face or through consultation response direct using the Lancashire County Council One Council response process.

The School Planning Team would however like to again highlight the fact that we still have major issues with securing a school site and a land contribution in Wyre which in turn provides risk to Wyre's Local Plan delivery.

Yours Faithfully,

Marcus Hudson
Head of Planning

Statement from Stalmine-with-Staynall Residents' Association on the Wyre Planning Policy – Wyre Local Plan (Regulation 18 and call for sites – January 2022).

Stalmine-with-Staynall Residents' Association believes Wyre Borough Council is not doing enough to protect the interest of rural residents living Over Wyre. Wyre Borough's attitude towards large scale developments in rural areas needs to change.

Current planning policy has led to:

- Increased traffic on the A588, the fourth most dangerous A road in Britain and the most dangerous in Lancashire.
- Loss of green space due to the creeping urbanisation of Over Wyre.
- Too much development without the concomitant provision of improved facilities for residents.
- No improvement in public transport to facilitate decreased reliance on the motor car.
- Undue pressure on local facilities such as schools and medical services.
- No significant improvement in land drainage infrastructure.
- No action by Wyre Borough to decrease its housing provision target as has happened in the Preston City Council area.

If there are going to be any more developments over Wyre they need to be small, sustainable and bring tangible benefits to communities.

Traffic

In recent years there have been calls by experts and learned bodies for new developments to take place on brownfield sites in urban areas, near transport hubs, with the aim of decreasing reliance on the motor car.

In September 2021 the Government's Climate Adviser Lord Deben, who chairs the independent Climate Change Committee, warned the Housing and Local Government Select Committee against building hundreds of homes in villages where most workers would have to commute by car.

He called on councils to focus on developing cities or towns, or near rail stations. He said: "You have got to plan your future around hubs so that people can get to work on their feet or a bicycle."

Developments with large houses with four or five bedrooms tend to have parking spaces for three or more cars which add to the number of cars on the road in rural areas. Ownership figures for the Over Wyre area are higher than the County average already.

A recent study by Highways England showed an 81 percent dependency on the private motor car in the parishes of Hambleton and Stalmine-with-Staynall. This compares unfavourably with a 72 per cent dependency in the rest of the Wyre area and 70 per cent in Lancashire. Development of more commuter homes in the two parishes will only increase dependency on the motor car. This high dependency will make the area less attractive to public transport operators who will see little profit in providing services in the area. Alternatively it will need a greater subsidy from Lancashire County Council to ensure a local

bus service. Thus it is essential that a system of community transport is widely available and widely promoted to ensure its success.

Road safety

Wyre drivers have collected 7,375 points on their licences. This represents 6.7% of the population. Nearby Fylde drivers are the 10th worst in the country for licence points with 5,726 points on their licences representing 7.3% of the population.

According to data from Ordnance Survey and the DVLA, Wyre has:

- 5,592 drivers with 3 points on their licence
- 1,325 drivers with 6 points on their licence
- 32 drivers with 12 points on their licence

Clearly there is a role in town planning for encouraging less reliance on the motor car and improving road safety.

Loss of greenspace

A lack of green spaces in UK cities is killing 7,000 people in the UK every year, a study claims. Blackpool is the third worst city in Europe and by default the worst in Britain. The creeping urbanisation of the rural areas to the north of Blackpool is only contributing to this problem.

ONS figures released in March 2022 show life expectancy for men living in Blackpool was 74.08 years, 10.66 fewer than Westminster, and for women it was 78.99 years, 8.87 fewer years than Kensington and Chelsea which was 87.86 years.

Scientists calculated that nearly 43,000 premature deaths are caused by a lack of green spaces in nearly 900 European cities.

Urban parks help improve the air quality, filtering out toxic pollutants that kill scores of people every year, said the Barcelona Institute for Global Health researchers.

Researchers say they offer no-cost spaces for people to exercise, helping drive down obesity rates and improve heart and lung health, and improve social interaction.

Other benefits of green spaces include reduced stress and improved sleep, with some studies have also associated it with reduced cognitive decline in the elderly.

Green spaces have also been found to reduce some the negative health impacts of urban living, acting as a filter to both noise and air pollution which are thought to reduce life expectancy by increasing blood pressure.

Over Wyre should be the green lung of Wyre Borough and not the happy plot for rapacious developers.

In July 2021 an RAC study found around two-thirds of home owners with a garage do not use it for the purpose was intended to. It means the amount of space occupied by modern cars on residential roads is now a third more than in the 1960s.

The top selling cars in the 1950s were 4ft 11in wide and 12ft 9in long. In 2020 the five most popular cars were 5ft 11in wide and 14ft 1in on average. Meanwhile private garages have largely remained the same width 6ft 11 in on average. This gives only 6in of clearance on each side when modern cars are used.

The RAC is calling for developers to build larger garages to help clear the streets. Wyre Borough should follow this call when assessing development plans.

The need for improved facilities

Essential services such as shops, schools and doctors are often almost impossible to reach on foot or by bike.

The Government Planning Department welcomed the RAC's report, agreeing new housing should depend less on cars.

The Transport Secretary Grant Shapps said last year: "Public transport and active travel (walking and cycling) will be the natural first choice for daily activities.

But the report from Transport for New Homes – backed by the RAC Foundation - says car dependency is actually getting worse.

Its researchers conducted field visits to 20 new housing developments across England – three years after a previous survey around the country. They found that greenfield housing has become even more car-based than before. They say the trend for building with the car in mind extended beyond housing, with out-of-town retail, leisure, food outlets and employment orientated around new road systems.

They found that planners and construction firms are building in a style they refer to as 'car-park to car-park'.

In practice, greenfield estates planned as 'walkable vibrant communities' were dominated by parking, driveways and roads with easy access to bypasses and major roads.

In contrast, 'brownfield' developments on previously built-up land in cities tended to be less car-based, allowing better access to local amenities by foot, cycle and public transport, the report said.

"Small shops, cafes and businesses built for local living are just not there in most new greenfield estates. Good public transport often remains aspirational with cuts to services looming. For people who cannot afford a car or cannot drive, they are essentially stuck. This cannot be a healthy vision for how people will live in the future.

Reacting to the report, a spokesperson for the Department for Levelling Up, Housing and Communities said: "By 2030, we want half of all journeys in towns and cities to be walked or cycled and are investing £3 billion into bus services.

"National Planning Policy is clear that significant development should give priority to pedestrians, cyclists and public transport and we will be updating guidance later this year to promote street design that favours walkways and cycle paths over motor traffic."

Intriguingly, the research by a new green group – Transport for New Homes - has been backed by a motoring group, the RAC Foundation.

Researchers visited more than 20 new housing developments across England in what they say is the first piece of research of its kind.

They found that the scramble to build new homes is producing houses next to bypasses and link roads which are too far out of town to walk or cycle, and which lack good local buses.

Impact on local services

Recent applications for large housing developments in the Stalmine area have led to applications from Lancashire County Council for funding from developers to improve schools and from the local Clinical Commissioning Group funding to improve medical facilities.

If development is not checked local schools will not be able to cope which will lead to either the building of new schools or the bussing of children to schools outside the area.

The Over Wyre Medical Practice is the largest practice in the Wyre, Fylde and Blackpool CCG areas. With large developments leading to an increased population the current position will become untenable necessitating a radical restructure of local medical services.

Land drainage infrastructure

Large developments Over Wyre have had a deleterious impact on land drainage. Before any other development is permitted there needs to be a root and branch improvement to the land drainage system. There have been too many local flooding issues in recent months.

Housing targets

The problem is that planners are measured by whether they hit their targets for new housing. At the moment they just approach developers who are sitting on greenfield sites and end up peppering housing round towns without any regard to whether the land is accessible or not.

Housing targets are not written in tablets of stone. Recent campaigns by parish councils in the Preston city area, with the help of MP Ben Wallace, have managed to get target figures reduced. Wyre Borough should follow suit and get its target figures reduced so it can concentrate on brownfield sites south of the River Wyre.

If there is to be any development north of the river the SSRA suggests it be limited to small developments of affordable housing, starter homes, and homes suitable for older people.

Call for sites

Stalmine-with-Staynall Residents' Association will not be nominating any sites for development.

Peter Swarbrick

Vice-chairman Stalmine-with Staynall Residents' Association

By email: planning.policy@wyre.gov.uk

Planning Policy Team
Wyre Council
Civic Centre
Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Your ref:

Our ref:

Date: 10-MAR-22

Dear Sir / Madam

WYRE LOCAL DEVELOPMENT PLAN REVIEW CONSULTATION

Thank you for your consultation seeking the views of United Utilities as part of the Local Plan Review process for Wyre. United Utilities notes the ongoing concurrent work being undertaken for the Partial Review of the Local Plan and will also feed into future consultations for both the Partial and Full Reviews.

United Utilities wishes to build a strong partnership with all local planning authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information. This helps:

- ensure a strong connection between development and infrastructure planning;
- deliver sound planning strategies; and
- inform our future infrastructure investment submissions for determination by our regulator.

We encourage you to direct future developers to our free pre-application service to discuss their schemes and highlight any potential issues by contacting:

Developer Services – Wastewater

Tel: 03456 723 723

Email: WastewaterDeveloperServices@uuplc.co.uk

Developer Services – Water

Tel: 0345 072 6067

Email: DeveloperServicesWater@uuplc.co.uk

United Utilities wishes to highlight the benefit of early, constructive communication with the council and site promoters to ensure a co-ordinated approach to the delivery of any future allocations. We will seek to work closely with the council during the local plan process to develop a coordinated approach for

delivering sustainable growth in sustainable locations. When preparing the Development Plan and future policies, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.

Our Assets

It is important to outline to the LPA the need for our assets to be fully considered in development proposals. We will not normally permit development over or in close proximity to our assets. All United Utilities' assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping proposals in the vicinity of our assets and any changes in levels. We strongly recommend that the LPA advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact United Utilities to understand any implications using the above contact details.

Future Growth Strategy and Allocations

It is noted that the Growth Strategy and allocations will need to be reconsidered as part of the Wyre Local Plan Review. We welcome early sight of any proposed allocations and would appreciate the opportunity to be a part of the site selection process where possible. Once more information is available, we will be able to better understand the potential impacts of allocations on our infrastructure. Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. At the current time, the full detail of the development proposals are not yet known. Once more information is available, we will be able to better understand the potential impacts of development on infrastructure

We wish to highlight the nature of Wyre which includes large rural areas. Such areas are often supported by infrastructure which is proportionate to their rural location. United Utilities wishes to highlight that disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. Therefore, when considering growth proposals, it is good practice to ensure that growth is proportionate to the size of the settlement.

Co-ordinated Infrastructure Provision

Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals are not yet known. For example, the detail of the drainage proposals or the water supply requirements. As a result, it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure over a number of 5 year investment periods and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the delivery of development with the timing for delivery of infrastructure.

Once more information is available with respect to specific development sites, which is often only at the planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements.

Groundwater Source Protection Zones

With respect to the site selection process, we wish to highlight that new development sites are more appropriately situated away from locations which are identified as sensitive groundwater protection areas especially within and adjacent to Groundwater Source Protection Zone 1 (SPZ1) which is closest to the water abstraction point and the most sensitive. The location of SPZs can be found on gov.uk and we request that you refer to these in your approach to site selection. It is important that any local plan includes a clear policy that addresses the issues associated with development within and near to groundwater source protection zones. This is particularly important in Wyre because it is the location for significant groundwater abstractions for public water supply.

Flood Risk from Public Sewers

Existing drainage systems are often dominated by combined sewers. This method of sewer infrastructure is a result of the time it was constructed, with combined sewers taking both foul and surface water. If there is a consistent approach to surface water management as part of new development, it will help to manage and reduce surface water entering the sewer network, decreasing the likelihood of flooding from sewers, the impact on residents and businesses, and the impact on the environment.

It is important to explain that we operate 72,000 km of sewers. Whilst we do all we can to reduce the risk of sewer flooding, there remains a residual risk, which is a source of flooding that should be considered in the site selection process to ensure any risk to new development sites is minimised. National planning policy is clear that flood risk from all sources, including flood risk from public sewers, needs to be considered. Paragraph 162 of the National Planning Policy Framework states:

'The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.'

As part of your site selection process, we therefore request early sight of potential allocations so we can advise you on any potential sewer flood risk.

Climate Change

United Utilities would wish to highlight its support for any climate change policy. Sustainable surface water management and the efficient use of water should be critical elements of any such policy within the Local Plan. We encourage any policy on climate change to be intrinsically linked to wider policies in the local plan including those relating to the detailed design of new developments and the provision of green and blue infrastructure.

We would be keen to ensure any climate change policy gives appropriate emphasis to green and blue infrastructure, natural flood management techniques, multi-functional sustainable drainage, designing new development so that it is resilient to the challenges of future climate change and the incorporation of water supply efficiency measures. As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management and landscape design is outlined as a strategic requirement in all allocations, it will help ensure that sustainable surface water management is at the forefront of the design process.

Large Sites in Multiple Ownership

United Utilities has concerns regarding any large site allocations which are in multiple land ownerships. The experience of United Utilities is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding framework and masterplan. We believe that raising this point at this early stage is in the best interest of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner.

Sustainable Drainage - Foul Water and Surface Water

New development that may be identified in the Local Plan should manage foul and surface water in a sustainable way in accordance with national planning policy as a requirement. We wish to emphasise the importance of any future policy setting out the need to follow the hierarchy of drainage options for surface water in national planning practice guidance which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water. United Utilities recommends that the issues of flood risk and surface water management are dealt with as two separate policies. It is our view that a separate planning policy for each matter sets a clear process in relation to surface water management for all new development.

Water Efficiency

We wish to recommend that the local plan includes a policy requirement for development to be built to the optional water efficiency standard prescribed in Building Regulations. A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d).

In 2015 an '*optional*' requirement of 110 l/p/day for new residential development was introduced, which can be implemented through local planning policy where there is a clear need based on evidence. We have enclosed evidence prepared by Water Resources West to justify this approach. As you will see from the evidence, we believe that the optional standard can be achieved at minimal cost.

As mentioned above, surface water should be managed as close to its source as possible. There are opportunities such as rainwater recycling, green roofs and water butts and we would encourage the LPA to embrace all water efficiency measures. Modern design techniques can promote measures for water recycling to reduce the impact on infrastructure requirements.

Biodiversity Net Gain

As part of our response to the Environment Act and in preparation for the future delivery of biodiversity net gain (BNG), we are currently reaching out to local authorities to ensure we develop a BNG strategy that, wherever possible, supports local biodiversity and nature recovery needs. As part of the preparation of your new local plan, we would welcome the opportunity to further discuss your approach to the delivery of BNG and the identification of strategic opportunities to support local nature recovery. We are keen to ensure that BNG is delivered in the most appropriate locations and without restricting the potential future expansion and operation of key operational infrastructure which is often very geographically restricted and critical to meeting future growth and environmental drivers.

It is important that any approach to the delivery of BNG considers the context of the development and what is best for biodiversity. We recommend that any BNG policy includes flexibility to allow a balanced decision based on the circumstances of a proposal and a site. It is important to recognise that the location of land for infrastructure is often restricted and cannot be easily relocated. Therefore the land that is within and adjacent to a site used for infrastructure is at a premium. We would not wish to see a BNG policy which includes a spatial hierarchy that inflexibly prioritises on-site BNG on key infrastructure sites as this could be detrimental to the availability of that land for infrastructure investment to support future environmental drivers and growth needs.

Summary

Moving forward, we respectfully request that the council continues to consult with United Utilities for all future planning documents. In the meantime, if you have any queries or would like to discuss this representation, please do not hesitate to contact me.

Yours faithfully

Andrew Leysens
Planning, Landscape and Ecology
United Utilities Water Limited

Enc. Water Efficiency Evidence



Planning Policy
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

10 March 2022

Dear Sirs,

Wyre Local Plan – Full Review – Regulation 18 Stage

Rossall School wishes to make a broad comment over the above process, and seek to firstly register their interest in the Local Plan at this stage.

As you will appreciate, the School is a key employer and also plays a significant, positive role in the community both directly and indirectly. In this regard, we have noted the support in the current Local Plan for the potential circumstances where additional development in and around the school may be appropriate. This has helped play a role in supporting the investment made by the school in new sporting facilities in recent years. We would therefore wish to see the Local Plan Review continue that support going forward.

The School is seeking to deliver its Strategic Plan and this will involve further investment in and around the school over the coming years. In a post-covid environment we are also reviewing that Plan and we must seek to provide long-term investment into, and solutions to, some of the issues that face us. We must continue to remain competitive in an



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ever-changing world and to that extent we will need to look at innovative ways of investing in the future, and how we best use the overall school assets to that effect.

This is likely to involve additional development in and around the campus area, but the extent and level of such development is not yet fully crystallised. To that extent ongoing work is being done with regards to the detail of how we can deliver the Strategic Plan and any amendments to it, its potential costs, and the means by which they can be sustainably funded.

We would welcome the ability to discuss this in further detail with the Council shortly to consider how the Local Plan may best support and reflect our future aims and look forward to commencing that dialogue with you accordingly.

Yours sincerely

Emma Sanderson
Bursar



Rossall School, Fleetwood, Lancashire, FY7 8JW
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Wyre Local Plan Review – Regulation 18 and Call for Sites

Representation for Wainhomes North West



Project : 18-555
Site address : Wyre Local Plan Review
Client : Wainhomes North West

Date : March 2022
Author : Stephen Harris

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Contents:

1. Introduction	1
2. Plan Period	1
3. Housing Requirement	1
4. Other Matters	6
5. Appendices	7

1. Introduction

1.1 Emery Planning is instructed to submit representations to the Wyre Local Plan Review Scoping Regulation 18 consultation on behalf of Wainhomes. Wainhomes have interest in land which are:

- Normoss Road, Poulton;
- Land east of Poulton.

1.2 The extent of Wainhomes interests that they are to promote are shown on the completed Call for Sites submission appended at **EP2 and EP3**. As the LPA will be aware Wainhomes are an active developer in the areas with a number of extant consents completed or under construction.

2. Plan Period

2.1 With regard to the plan period the Council will need to consider paragraph 22 of the Framework which states:

“Strategic policies should look ahead over a minimum 15 year period from adoption¹⁵, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

2.2 At this stage there is no proposed plan period but we consider that a plan period to 2040 as a minimum is necessary.

3. Housing Requirement

3.1 Paragraph 61 of the Framework states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

3.2 Paragraph 2a-010 of the National Planning Practice Guidance (NPPG) states:

“When might it be appropriate to plan for a higher housing need figure than the standard method indicates?”

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

3.3 As set out above, the minimum local housing need figure under the standard methodology is the starting point. It is imperative that as part of the full review that the evidence bases assesses each of the criteria in Paragraph 2a-010 of the NPPG particularly as Wyre has been part of a wider HMA.

3.4 The Standard Method does not assess the affordable housing needs in each LPA area as the PPG¹ confirms where it states:

“An affordability adjustment is applied as household growth on its own is insufficient as an indicator of future housing need because:

household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and

people may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford.

*The affordability adjustment is applied in order to ensure that the standard **method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.**” (our emphasis)*

3.5 Paragraph: 010 Reference ID: 2a-010-20190220 states:

“Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- **an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;***

*There may, occasionally, **also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.**” (our emphasis)*

3.6 On affordable need, the Local Plan Inspector’s Report states:

“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

¹ Paragraph: 006 Reference ID: 2a-006-20190220

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."

- 3.7 In the case of Wyre, the SHMA identified an annual net need of 189 affordable homes per annum and specific reasons (as highlighted above) as to why 479 dwellings was appropriate. Therefore, whilst there was not a specific uplift above the proposed OAN for affordable housing or the economy, the Inspector was clear that affordable housing and economic benefits would not be delivered using the full OAN. We do not consider the standard method addresses these points and they cannot be ignored as they presently are in the Partial Review.

3.8 The current standard method results in the following local housing need for Wyre:

2020 household projections per annum	Affordability ratio	Adjustment factor	Minimum annual local housing need
259	6.29	1.1431	296

3.9 It is on this basis that Wyre's housing requirement is proposed to be revised through the partial review to a minimum of 296 dwellings per annum. However, the uplift of only 37 dwellings per year which is far short of meeting affordable housing needs and the other factors which satisfied the Inspector that the LPA should meet its full OAN. By using the standard method, the Council is ignoring the Inspector's conclusion on this issue and will have a significantly detrimental impact on the provision of affordable homes.

3.10 As a minimum the LPA should have undertaken an affordable housing update to understand the local circumstances as to whether the affordability ratio is appropriate. It must be remembered that providing homes for those in affordable housing need is a crucial part of the planning process and a simple application of the standard method will not meet their needs. The latest affordable housing position is set out by Tetlow King (**Appendix EP3**) which shows a worsening position.

3.11 Therefore, an uplift for based on past delivery rates, the housing trajectory and affordable housing need is required as a minimum.

3.12 With regard to the flexibility the Local Plans Expert Group published its report to the Communities Secretary and to the Minister of Housing and Planning in March 2016. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.

3.13 Therefore, the requirement should be treated as a minimum and a flexibility percentage should be considered and in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated and help ensure a five-year housing land supply could still be maintained and it would deliver a greater level of affordable housing.

4. Other Matters

4.1 It is unfortunate that the consultation has not listed the scope that the LPA consider appropriate for comment and if assessments are not proposed why this is the case. At this stage we consider that the LPA should follow the advice in the Plan Making chapter of the PPG on all social, environmental and economic issues. Of fundamental importance to any plan review are:

- Strategic Housing Land and Economic Availability Assessment;
- Green Belt Assessment; and,
- Settlement Assessment including identifying housing, employment and other social and environmental infrastructure needs that the Plan can seek to accommodate.

4.2 This concludes our representations.

Planning Policy
Civic Centre
Breck Road
Poulton-le-Fylde
FY6 7PU

Date: 10 March 2022

Our ref: 04051/45/NT/SRo/20621579v4

Dear Sir/ Madam

Wyre Local Plan Full Review: Letter of Representation

On behalf of our client, Bourne Leisure Ltd (“Bourne Leisure”), please find below representations on the Wyre Local Plan Full Review. The Local Plan [LP] is published for comment until 10 March 2022.

Background

By way of background, Bourne Leisure operates more than 50 holiday sites across Great Britain in the form of holiday parks, family entertainment venues and hotels. These sites are operated under the Haven Holidays, Warner Leisure Hotels and Butlins brands. Bourne Leisure is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within the local plan area, Bourne Leisure operates the Cala Gran Holiday Park under its Haven brand.

It is acknowledged the Local Plan Full Review is at an early stage, therefore Wyre Council [the Council] has not yet predetermined the issues to be considered nor the evidence base that will be required to support for full review. This representation considers the issues relevant to the tourism industry in Wyre.

Drivers of Change

For some years there have been changes in the demands of visitors to the type and quality of tourist infrastructure expected from their holiday destination. The infrastructure focuses on, but is not limited to, accommodation and attractions. Operators must listen to the demands of visitors for higher quality provision and environmentally aware options and in turn deliver on those expectations. The demands will continue to evolve.

The tourist industry was significantly impacted by the Covid-19 pandemic, with activity prevented for long periods of time throughout 2020 and 2021 due to government restrictions. The Government’s ‘Tourism Recovery Plan’ (published in June 2021) clearly recognises that tourism is an economic, social and cultural asset, with the sector being a major contributor to jobs and growth in the UK. It explains that the Government is determined to help the tourism sector recover as quickly as possible from the devastating impacts of Covid-19 on visitor numbers.

In contrast to the extremely challenging times, there has also been a surge in demand for domestic holidays when the restrictions were lifted. Experience from the 2008/9 recession shows that even when foreign travel

rates increase again, patterns of behaviour mean that the public will continue to take short breaks as well as longer holidays in the UK. These are in addition to, rather than entirely at the expense, of foreign holidays.

For some years, there has been a cultural shift towards families and friends getting together more often away from the home to celebrate life events, such as birthdays and anniversaries. With extended periods of imposed and self-imposed limits to mixing, the trend is not likely to wane. What is not yet clear is whether 'Brexit' will also result in sustained increases in domestic tourism. We believe it will have a role but to date it has not been possible to draw firm conclusions given the skewed patterns of activity from the last two seasons.

There are other drivers of change for increased domestic tourism. An increasing awareness of climate change and the impact of international travel has also started a cultural shift towards domestic tourism in recent years, contributing to tackling the Climate Emergency declared by many authorities in England, including the Council.

Further, Wyre's tourism sector also facilitates access to the coast and countryside, providing physical and mental health and wellbeing benefits through a variety of types of holidays. People want experiences, activity, and relaxation and the Borough of Wyre offers diverse assets from the coast to the Forest of Bowland Area of Outstanding Natural Beauty [AONB].

The benefits of tourism in Wyre are important, not least the economic benefits. There is a continued need for investment in the sector in the Borough following the challenges of the Covid-19 pandemic, and to respond to the evolving demand for alternative holiday accommodation types. This investment is needed in order to continue attracting guests through the provision of high-quality accommodation and facilities to secure the continued benefits that the sector brings.

It is understood the Council is yet to update their evidence base documents for the Local Plan Full Review. However, there is important baseline context available, and we do not expect this will have changed significantly over the recent years.

The Council's economic evidence base notes the importance tourism plays in the Borough of Wyre. The Council's Scoping Report (2021) (prepared for the Local Plan Partial Review) notes the high-quality natural environment of the Borough is what attracts many tourists. The Wyre Employment Land Review [ELR] and commercial leisure study report (2012) also note at paragraph 2.57 that tourism is one of the key industries on the Fylde Coast. It is noted that the tourist industry makes up one in ten jobs in the Borough, accounting for one of the Borough's key employment sectors. The ELR and commercial leisure study report notes visitor nights (nights per trip) is considerably higher in the Borough than the regional average.

The Council's ELR notes the Borough of Wyre has a relatively low level of self-containment, with more residents in the Borough than the number of jobs. The tourism industry is an important industry to Lancashire as a whole. The tourism industry in Blackpool, for example is the largest employment sector¹. It is considered policies which seek to limit the growth of the tourism industry in Wyre would have adverse impacts that also affect the wider region. The findings of the Council's economic evidence base are welcome, and it is considered policies should reflect the important role tourism plays in the economy of the Borough to unlock the benefits of a growing domestic tourism industry.

The Council's Employment Land Study Update (September 2015) notes Experian projects a 48.3% growth in jobs in the leisure and tourism sectors in the recreation category, a figure noted for being higher than the regional average (up to 2031) in the Borough. To ensure the Borough benefits from the growth in domestic

¹ Blackpool Local Plan Part 1: Core Strategy 2012-2027

holidays, it is considered there needs to be clear and supportive policies which allow for the growth of the tourism and leisure sector in Wyre.

Coastal Change

There are large areas at risk from coastal and river flooding in the Borough of Wyre. Whilst development ought to be directed to areas of low flood risk, it is important to recognise that tourism is often located in coastal areas, which can be at risk from coastal flooding. It is noted that the idyllic coastal locations are what attracts tourists to many holiday sites throughout the UK. Policies should allow for appropriate flood water mitigation /flood defences/site management and advanced warning measures to allow development to continue in areas where development already exists.

The Council's evidence base on flooding notes that in certain circumstances development may need to occur in areas located in Flood Zone 3. Under these circumstances, the Level 2 Strategic Flood Risk Assessment [SFRA] and Community Assessment notes the exception test will apply. It is agreed that it is not always possible to locate development away from areas at risk from flooding. It is considered restrictive policies in areas at risk from flooding may be damaging to the economy of Wyre as some of the main urban centres within the Borough are located in areas at risk from flooding. The Level 2 SFRA and Community Assessment notes large areas of the Borough of Wyre already benefit from flood defences.

Existing development in an area at risk from flooding, should not prevent operators seeking to provide enhanced or new facilities where wider benefits can be achieved. There will be a balance between what should be delivered and what needs to be delivered within the context of economic, social, and environmental drivers. In such locations the operators managing a site have plans in place to monitor risks and ensure the safety of the site and their guests. Often holiday parks are closed during winter months (when flood risk is generally higher). Therefore, they are quite different to say residential developments and properly operated and with plans in place to manage risks. It is necessary, as is already underpinned by the planning system, to ensure that each application is considered on its own merits and takes into account the specifics of its location, the nature of the development, the impacts of the proposal and the mitigation and enhancement put forward. It is vital that the review of the Local Plan continues to provide such a framework rather than apply a blanket restriction or approach.

Biodiversity

Many of Bourne Leisure's sites nationally are located in rural and/or coastal areas, incorporating or adjacent to environmentally and ecologically sensitive locations. As such Bourne Leisure takes the need for environmental protection and enhancement fully into account – both in day-to-day operations and when drawing up development proposals for sites.

It is considered the provision of mitigation is the appropriate response in situations where adverse impacts may arise.

The Environment Act gained Royal Assent in late 2021 and introduced a new environmental governance framework and will (in time) set in law specific measures on waste and resources, air quality, water and nature and biodiversity. The Act introduces a new requirement on developers to provide a minimum of 10% Biodiversity Net Gain [BNG] as a condition of planning permission for new development. This requirement will become mandatory on all qualifying planning permissions 2 years after the Bill is enacted (i.e. November 2023). The adoption of the new Local Plan is likely to align with the legal introduction of the 10% BNG. Requirements in the Local Plan that go beyond what the Act requires is likely to have unintended consequences on deliverability of wider sustainability objectives.

Green Belt

The Framework sets out the five purposes of Green Belt land (§138). It is important that Green Belt land continues to meet the tests as set out in the Framework.

The Council's Green Belt Study Site Assessment Proformas [SSAP] (2015) states the nature of the development (a static caravan park as opposed to dwellings) on the parcel of Green Belt covering the Cala Gran Holiday park is considered not to diminish the contribution of the parcel in preventing the merging of urban settlements. The parcel of Green Belt which includes the Cala Gran Holiday Park and open space to the south east of the park, is noted in the Green Belt SSAP as providing no importance to preserving the setting and character of Fleetwood or Thornton. In this context and for the sake of consistency, the emerging Local Plan needs to also recognise this and provide flexibility for similar caravan development in this Green Belt. Given the conclusions of the 2015 study the park at Cala Gran could be expanded to some extent without having any further material impact on the Green Belt. The Local Plan could set a general guidance figure about the additional development that would be acceptable. The question is how much/what percentage? In various green belt locations, the approach is to allow 20-30% additional floorspace to existing development as this will not materially affect the impact on the GB. For Cala Gran we suggest that a figure of 20% is appropriate.

Holiday Accommodation

The adopted Local Plan introduces Core Development Management Policies which take a generally positive approach to development. It is considered the revised Local Plan should retain this positive approach.

Policy EP9 is the key adopted policy for future holiday accommodation proposals and it's right that there is a single policy covering a range of such accommodation. This provides flexibility to allow the offer to evolve over time to respond to changing demands. The existing policy's overarching support for new holiday parks should be retained but the policy should be refined to explicitly support extensions to existing holiday parks and not just new sites.

It is considered Policy EP9 should be reviewed in full to ensure it meets current and future needs. Holiday accommodation policies need to provide a positive framework for the next 15-20 years.

How can the Council Help?

Bourne Leisure operates 50 holiday parks under its brands across England, Wales and Scotland. In Fleetwood, it operates the Cala Gran Holiday Park – a very popular and successful park. The enhancement of parks requires a continuous effort and investment.

Holiday parks need policies that include support for: the extension of the holiday season, a net increase in units and changes to pitch types to meet the changing demands of the sector, extensions to the parks with and without an increase to pitch numbers, and the refurbishment of existing and installation of new central facilities or ancillary infrastructure. These can all be achieved as sustainable development within the wider environmental context with well-considered development proposals.

Seeing the opportunities available, many authorities across the UK will be reviewing how they attract important visitor spending to support their economies. A failure to provide a positive framework would result in a lack of private investment in Wyre's tourism sector. Without the right policies, operators will choose to invest elsewhere resulting in the risk of declining infrastructure and tourists choosing other destinations - the economic benefits of the industry would be reduced, and opportunities lost. A positive policy framework to allow the tourist industry to continue to adapt and innovate must be set out in the emerging Local Plan.



We would be pleased to discuss any aspect of our representation with you.

Yours faithfully

Helen Ashby-Ridgway
Planning Director

Wyre Borough Council
Planning Policy
Wyre Civic Centre Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Our ref: NO/2012/103607/CS-06/IS1-L01
Your ref: Wyre Local Plan Full Review
Date: 10 March 2022

Dear Planning Policy Team

Public Consultation. Regulation 18 and Call for Sites 2022 | The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 (as amended) | Wyre Local Plan Full Review Scoping Consultation and Call for Sites

Thank you for consulting us on the above.

The Environment Agency is an important consultee in the strategic planning process. We provide advice and guidance to local planning authorities throughout the development plan process which covers a range of topics including (but not limited to):

- **Net Gain** – an approach to managing the environment that leaves it in a measurably better state
- **Flood risk management** – ensuring development is steered towards areas of lowest flood risk, underpinned by a robust and up to date strategic flood risk assessment that follows our guidance and securing contributions to flood risk management infrastructure to unlock development potential where appropriate;
- **Climate change** – ensuring policies, site allocations and design of development takes climate change into account;
- **Strategic water planning** – quality, quantity and efficiency to support new development and safeguard the environment;
- **Drainage and infrastructure** – ensuring new development has adequate infrastructure to manage waste water and surface water disposal;
- **Green and blue infrastructure** – for flood risk management, water quality management and biodiversity;
- **Contaminated land** – bringing land back into beneficial use;
- **Water Framework Directive objectives** – no deterioration and water body improvements;
- **Biodiversity** – safeguarding protected species and habitats, highlighting opportunities for habitat creation; and
- **Waste management** – advising on waste management strategies and providing advice that spans the planning and permitting interface.

Our advice on the following pages (see Annex 1) has regard to these topics above, however it should be recognised that climate change is a cross-cutting theme that can have impacts across all topics on one way or another.

The preparation of the new Local Plan comes when the expected impacts of climate change and the urgency of mitigating and adapting to them are becoming more

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important to our future. We are aware that Wyre Council has declared a climate emergency to promote and encourage actions at local and national levels. Mitigating the impact of and adapting to climate change has been identified by the Council as a key issue for consideration in developing the new Local Plan.

The impacts of new development on climate change and the subsequent effects on the environment, society and the economy in the plan area will be influenced by the policies of the Local Plan. The ultimate aim should be to ensure development across the local plan area is sustainable having regard to international and national policies, agreements and guidance that is in place to try and avoid the worst-case scenarios associated with climate change.

Key issues that the Local Plan should address include:

- **Climate change should be central to the Local Plan and adaptation and mitigation should be incorporated into policies throughout**
- **Development should be used as an opportunity to deliver positive actions to mitigate and adapt to climate change.**
- **Flood risk management, including climate change adaptation and mitigation; nation planning policy now requires future flood risk to be taken into account in the sequential test; an up to date strategic flood risk assessment will be required to reflect current flood modelling outputs, flood zones and climate change allowances.**
- **Sustainable water use and water resource availability**
- **Biodiversity net gain (BNG) – policy requirements should at least align with the mandatory 10% net gain for all developments through the Environment Act 2021; LPAs are encouraged to investigate the feasibility of going beyond this.**
- **Clear links should be made between climate change (including mitigation and adaptation), BNG, green/blue infrastructure, natural flood management, reducing impacts on water quality, and benefits for people and the natural environment.**

We are keen to work with you to ensure that the updated Local Plan is ambitious and clear; that development is located in the most appropriate locations and that policies are strong and unambiguous when it comes to the standards of development that will be expected. Working with you to implement new policies would also help deliver our long-term goals as set out in our 5 Year Action Plan ([Environment Agency: EA2025 creating a better place - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/environment-agency-creating-a-better-place)):

- A nation resilient to climate change
- Healthy air, land and water
- Green growth and a sustainable future

If you have any questions or comments in relation to the above comments, please do not hesitate to contact me. We look forward to working with you and partners on developing the new Local Plan.

Yours faithfully

Mr Alex Hazel
Planning Advisor – Sustainable Places Team

Tel:

E-mail:

Cont/d..

ANNEX 1

Climate change

The Local Plan should include clearly demonstrate a commitment to your Council's declaration of a Climate Emergency, and acknowledges it as the all-encompassing issue that it is.

We recommend that the LPA considers introducing a single over-arching strategic policy relating to climate change that brings together in one place the principles for development that cover both mitigation and adaptation including, for example, the need to:

- Minimise greenhouse gas emissions;
- Contribute to community health, wellbeing and resilience;
- Contribute to natural ecosystems and biodiversity;
- Ensure resource efficiency;
- Promote sustainable transport;
- Promote efficient land use;
- Protect and improve air quality and water quality and resources.

New and revised policies should ensure future development is used as an opportunity to deliver positive actions that will help development mitigate and adapt to climate change, for example:

- Improve flood risk situations, promote improvements to the river channel, promote the use of natural flood management techniques to reduce flooding, and ensure better management of surface water to help to reduce the current causes of flooding.
- Ensure the implementation of improved water efficiency standards
- Protect and improve green and blue infrastructure, recognizing the multi-functional benefits it delivers.

In terms of climate change, important issues that the Local Plan should address include adaptation in relation to:

- Increased flood risk and the need for surface water management, as rainfall events become more intense, and sea levels rise.
- Ensuring sufficient water availability for human use and for the natural environment.
- Managing the impacts of climate change on the natural environment (e.g. impacts of hotter drier summers and wetter winters); and facilitating the environment's role in enabling adaptation.

The LPA should seek to implement a mechanism to enable developers to deliver or contribute to off-site climate change adaptation measures (e.g. natural flood management upstream of a new development, provision of flood storage in response to land raising, upland peatland restoration at the head of a catchment).

We would encourage requirements for any new development (above a threshold area / number of residential units) to produce a Climate Change Statement (for example) that demonstrates a commitment to a broad range of specified climate change mitigation and adaptation measures (potentially selected from a list of ranked options to address a range of issues). For example, provision of water infiltration measures such as permeable paving; provision of rainwater harvesting measures; inclusion of tighter water efficiency standards.

We would recommend the Council reviews the following joint TCPA and RTPI guide which we were involved with: [Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change \(tcpa.org.uk\)](https://www.tcpa.org.uk/publications/rising-to-the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change).

We recommend that the LPA review Lancaster City Council's recent Climate Emergency Review of the Local Plan, which we have been involved with, in particular the latest Draft Development Plan Documents (DPDs) which are available here: [Climate Emergency Review of the Local Plan \(arcgis.com\)](https://www.arcgis.com).

Flood risk and coastal change

Flood risk and coastal change are natural processes that also pose a risk to the safety of people and property. Climate change is expected to increase the probability and consequences of flooding and coastal change. Local Plans can help to ensure that new developments are resilient over their lifetime and help improve the sustainability of existing communities. Managing flood risk and coastal change can also improve the economic prospects of communities and improve the environment.

The outcomes we want to see through Local Plans:

- **Policies and allocations within Local Plans ensure no inappropriate development is located in areas at high risk of flooding**
- **Local Plans ensure development in areas at risk of flooding will be safe without increasing flood risk elsewhere**
- **Local Plans contribute to reducing flood risk for existing communities**
- **LPAs identify the risk of flooding from all sources through their Strategic Flood Risk Assessment (SFRA) and under the Duty to Cooperate work to manage and resolve any cross-boundary risks**
- **LPAs manage the risks of coastal change taking account of longer term strategies for their area and beyond**
- **We are able to secure financial contributions to our flood defence schemes from planning charges where appropriate**
- **Policies that seek to address the impacts of climate change, including the planning of green infrastructure, where flood risk management can be integrated with other benefits for water quality and biodiversity or can help to contribute to achieving River Basin Management Plan (RBMP) objectives**

The LPA should ensure that flood risk is appropriately addressed in relation to the latest requirements of the National Planning Policy Framework (NPPF) 2021 and best available information.

The Local Plan should be in accordance with the NPPF2021, which makes it clear that the Sequential Test, and the wider sequential approach, should take into account future flood risk from all sources (taking into account the predicted impacts of climate change). SFRA's will normally form the basis for applying the test.

It should be noted that the Environment Agency Flood Map for Planning does not take account of climate change. Areas that are considered to be at risk of flooding are likely to increase when climate change is taken into account.

Any new site allocations will need to take account of the above and will need to be informed by an up to date strategic flood risk assessment based on the latest guidance and Environment Agency modelling.

Since they were published there have been changes to the Flood Map for Planning in

the Wyre district as a result of updated/new Environment Agency hydraulic modelling and updates to climate change impacts on flood risk. As such, the SFRAs are no longer based on the based available information and need to be updated or a new SFRA produced.

We would recommend that the LPA look at improving flood risk policy as part of the review so it is in line with national planning policy requirements, but also goes beyond this by including additional requirements, which we can work on with you.

It should be clear that the latest climate change guidance should be considered as standard for all development proposals. Consideration should be given to both present and future flood risk (due to climate change impacts) over the lifetime of a development, and how that will be managed on site. Flood risk policy should include specific reference to the requirement to ensure no adverse impact on third party interest resulting from new development or associated mitigation measures, in accordance with the NPPF.

Flood Zone 3b

The Local Plan should make it clear that proposals, other than for necessary essential infrastructure or water compatible uses, will only be permitted in Flood Zone 3b (functional floodplain) in exceptional circumstances. Flood Zone 3b (functional floodplain) is identified and safeguarded through SFRAs and should be protected from new development. New development must not impede the flow of water within Flood Zone 3b, nor should it reduce the volume available for the storage of flood water. We recommend updating policy requirements to reflect this.

Strategic flood risk assessment (SFRA)

The updated SFRA should be based on our latest guidance which was last updated in September 2020 and is available on GOV.UK: [How to prepare a strategic flood risk assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-prepare-a-strategic-flood-risk-assessment). The guidance is now more detailed and more user-friendly, with helpful advice on joint working and consultation throughout SFRA preparation. This should help improve the quality and consistency of SFRAs.

An SFRA good practice guide, based on the findings of Environment Agency research on “using flood risk information in spatial planning”, has been published in December 2021. We would recommend that the LPA also has regard to this guidance, which can be found on the ADEPT website here: [FRS18204 SFRA Good Practice Guide Final Nov2021.pdf \(adeptnet.org.uk\)](https://www.adeptnet.org.uk/FRS18204-SFRA-Good-Practice-Guide-Final-Nov2021.pdf). Information about the research project which informed the guidance is available on GOV.UK here: [Using flood risk information in spatial planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-flood-risk-information-in-spatial-planning).

SFRAs are a vital tool for understanding all sources of flood risk and for assessing how the climate crisis will change this risk over time. They help local planning authorities make informed decisions about future development. They're also an invaluable tool for identifying the opportunities sustainable development may present for reducing the causes and impacts of flooding and for safeguarding the land likely to be needed for future flood risk management infrastructure.

We are aware that Blackpool Council expressed an interest in preparing a joint SFRA with Fylde Council and Wyre Council to cover the three districts. We would support this approach and encourage you to pursue this option.

The LPA may wish to consider a web-based SFRA with interactive GIS mapping, or a combination of a written report and interactive mapping. The advantage a web-based SFRA is that it can more easily be updated as required. However, consideration should be given to how the SFRA can be 'locked' for examination. An example of a web-based SFRA that we are aware of which covers several LPAs: <https://westlondonsfra.london/>.

Climate change allowances

The Local Plans and SFRA should be in accordance with the latest guidance on climate change allowances for flood risk assessments (including SFRAs), which has been updated since the Local Plan was adopted. Allowances were updated following UK Climate Projections 2018 (UKCP18) projections in December 2019 for sea level risk and for peak river flows in July 2021. Further information can be found on GOV.UK here: [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances).

The LPA should be aware that the peak river flow climate change allowances are due to be published in April 2022. We will update our climate change allowances guidance for [FCERM projects, schemes and strategies](#) at a similar time.

In July 2021 the Met Office finalised and republished high resolution rainfall projections as part of UKCP Local (2.2km), part of UKCP18. Alongside this release, research called FUTURE-DRAINAGE was published, which developed peak rainfall uplifts from the projections in UKCP Local. This information is important for understanding and managing the effects of climate change on surface water flood risk and informing the design of drainage systems for new development.

We are working with representatives from lead local flood authorities to update peak rainfall allowances and guidance so it reflects the latest research and projections. In doing this we have also liaised with the Met Office, the FUTURE-DRAINAGE team, relevant professional bodies and key government departments.

While the updated allowances have not yet been finalised, we don't expect the updated allowances will be significantly different to the allowances in our current guidance (dated July 2021) at the 'upper end' for the large majority of locations in the country. The main difference you will see is that the allowances will be provided at a sub-regional rather than national scale. Allowances are also likely to be provided for both the 1% annual exceedance probability event and the 3.3% annual exceedance probability event.

Sustainable drainage

We would encourage strengthening the requirement for sustainable drainage systems (SuDs) to be above-ground and incorporated into blue/green infrastructure to maximise potential benefits to the sense of place, amenity (designed to avoid the need for barriers), biodiversity and water quality. Schemes should include provision for long-term maintenance. The scope for effective above-ground SuDs may be increased if space is available off-site, not restricted to being within development site boundaries.

We would recommend that Local Plan has regard to the [North West SuDS Pro-forma \(lancashire.gov.uk\)](https://www.lancashire.gov.uk/planning-and-building-control/development-control/development-management/pro-forma-su-ds/). Flood risk and surface water management policy / supporting text should be updated to request that developers complete and submit a pro-forma with applications for planning permission. The pro-forma was produced by North West Regional Flood and Coast Committee 2020, which we are a part of, in July 2020, and could also form part of the LPA's 'Planning Validation Checklist'. We recommend this is discussed with the Development Management team.

Main river and flood defence access for maintenance and emergencies

Maintaining access to main rivers, as well as tidal and fluvial defences, is vital for ensuring maintenance and emergency response activities can be delivered. The Council should ensure that developments accommodate this requirement in their design layout. We encourage public open space to be adjacent to main rivers to enable access, rather than enclosed spaces (e.g. back gardens of properties). Consideration should be given to maintaining access to and from a development for residents during a flood incident.

Development proposals should demonstrate that there will not be an impact on tidal or fluvial defences. Policy requirements could include an additional element that unless agreed with the Environment Agency, development will not be permitted within an 8 metre buffer around an existing flood alleviation scheme or main river.

Natural flood management

We encourage the Council to promote nature-based solutions as part of future developments to manage flood risk and mitigate against climate change, and deliver benefits for habitats, wildlife and people. Examples of beneficial solutions that we would encourage include reconnecting the floodplain and upstream storage opportunities to slow the flow. Nature-based solutions should be considered as part of all developments, particularly where it is possible to manage flood risk holistically. For example, promoting multi-beneficial opportunities for attenuation and buffer strips on development which minimise discharge into main rivers and deliver SuDs.

The Local Plan should recognition of natural flood management techniques both inland and coastal could be highlighted more as a vision for alternatives to high carbon usage construction through materials such as concrete.

The Local Plans should identify a means by which developers could be required to contribute to natural flood management measures (techniques include changes to land management to promote water retention, tree and hedge planting, the creation of leaky dams), including on land outside the immediate boundaries of the development site. This could be tied in with biodiversity net gain requirements.

Other nature-based organisations may also be able to advise on for potential off sites mitigation for biodiversity net gain and sites for natural flood management.

Biodiversity

Local Plans can provide a mechanism for improving biodiversity. This can be done by establishing strategies, setting out policies and land use options to ensure development prevents damage to existing wildlife sites and corridors. They can also provide opportunities to develop new habitats to link rivers, lakes, wetlands and the coast. This will provide multiple benefits to society, including helping to reduce the impacts of climate change and enabling species and habitats to move as environmental conditions alter.

The outcomes we want to see through Local Plans:

- **Local Plan strategies and policies that enhance and protect biodiversity and contribute to helping wildlife adapt to climate change and reducing its adverse impacts.**
- **The Local Plan should ensure strong biodiversity net gain (BNG)**

requirements for developments. BNG should be linked with climate change adaptation and mitigation and should be woven into policies throughout.

- **Future development that improves biodiversity through valuing nature, protecting and enhancing or creating healthy, well-functioning ecosystems and ecological networks.**
- **Local Plan strategies and policies that seek to support the delivery of objectives and measures within the relevant River Basin Management Plans.**

The BNG approach, which was established in the NPPF2019 for new developments and planning policies, involves the delivery of more or better habitats for biodiversity and demonstrating the measurable gain through the use of a metric.

The Environment Bill recently became an Act of Parliament (on 9 November 2021) and will require a mandatory minimum 10% BNG. However, as this is not yet a legal requirement for developments we would encourage the LPA to update relevant policy requirements where possible to reflect this. This would enable LPAs and developers to prepare for and test the application of the BNG requirement before it becomes mandatory.

The Local Plan should implement a requirement for all major development types, (including highways and infrastructure projects which may not need planning permission), to achieve a minimum of 10% Biodiversity Net Gain (BNG) over the baseline site score as measured by the latest version of the Defra Biodiversity Metric or any subsequent on the application site.

We are aware that some LPAs are looking to go beyond the mandatory 10% BNG and we would encourage Wyre Council to investigate the feasibility of mandating a higher percentage BNG for all future developments.

The LPA should develop a structured delivery programme of specific environmental interventions that could be delivered as a consequence of development, so that any environmental interventions carried out by a developer contribute to an overarching programme. For example, tree planting along watercourses (note: flood risk activity permits are required where this within 8 metres of a main river), removing barriers to fish passage, restoration of peatland habitat).

The Local Plan should encourage the presence of wildlife corridors between designated or locally protected sites. This should include encouraging developers to leave corridors along development sites to make space for the movement of wildlife. In regard to designated and locally protected sites, it is important the mitigation hierarchy is followed, i.e. avoid, minimise, reduce, rectify and offset. This could also apply to a buffer zone around designated sites to safeguard their integrity.

We would encourage a standard expectation of developers in the Local Plan. This could include consultation with the Wyre Waters Catchment Partnership to look for opportunities to collaborate on environmentally beneficial interventions, where links to partner organisations could lead to significant improvements with minimal investment.

The LPA should use opportunities to help wildlife to adapt to climate change through sustainable drainage, wetland creation and restoration, promoting urban green space, protecting existing wildlife corridors and developing new ones, preferably linking existing and new sites.

Water Framework Directive (WFD)

The Water Framework Directive (WFD) seeks to improve water quality in all our waterbodies (including lakes, rivers and estuaries, groundwater and coastal waters). It sets a target for all waterbodies to achieve “good ecological status” by 2027; we also have to prevent the deterioration of waterbodies and seek enhancements where rivers, lakes and estuaries are not achieving good ecological status or potential. The planning system offers significant opportunities to help deliver WFD and biodiversity targets which should be addressed in the Local Plan.

The Local Plan should seek to deliver local [River basin management plans \(RBMPs\)](#) objectives and actions.

We would encourage the LPA to

- include policies that require an assessment of impacts on WFD where development has the potential to result in deterioration of a water body.
- include policies for de-culverting, removal of redundant structures from main rivers, create/maintain wildlife-rich corridors to buffer watercourses and sensitive/appropriate planting/alien species removal in river corridors. All elements that contribute to the achievement of WFD and biodiversity objectives.
- help deliver catchment-wide WFD objectives by cross-boundary planning to resolve any land use issues that are contributing to preventing good ecological status (or potential) being achieved.

Green and blue infrastructure

The Local Plan should link the climate emergency to green and blue infrastructure (GBI). GBI has a real opportunity to link with and deliver reductions in carbon emissions to deliver against carbon net zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development.

The Local Plan should include strengthened policies to put GBI at the centre of the design of major schemes, thus delivering benefits for wildlife and people. Provide a network of green/blue spaces to allow movement of wildlife within and beyond the site. Incorporating blue infrastructure will allow floodplains to be better connected, improve capacity within the overall water management system and allow the movement of water away from areas of high risk to areas where it could be better managed. Where appropriate, ensure these green/blue spaces are accessible for people to gain health and wellbeing benefits.

Main rivers could be considered as part of linear park / open space, which can provide the opportunity to join the growth in towns to other areas along river corridors, for example. Within proposed development sites that have floodplain as part of their development boundary there may be opportunities to link up the areas of linear park / open space to have a more significant environmental feature that deliver extensive environmental, wellbeing and economic benefits to the area.

Water resources

Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future.

Local plans can help to ensure that water resources are protected and, where evidence justifies, that water efficiency measures are adopted as part of regeneration and development.

The outcomes we want to see through Local Plans:

- **Enough water for people and the environment, taking into account a changing climate.**
- **Safe, secure water supplies are used efficiently to meet the needs of the public, business and the environment.**
- **Water is recognised and protected as a precious resource.**
- **Water efficiency in new buildings is encouraged to reduce water use and cut domestic carbon emissions and those from the treatment of water.**
- **Consideration of the water environment at the catchment scale, under Duty to Cooperate and helping to achieve effective planning for water and development where necessary.**
- **Consideration of water resources in respect of the subsequent impact upon water quality and policies that ensure ‘no deterioration’ under the Water Framework Directive.**

The Environment Agency is working with United Utilities and others to promote the use of tighter water consumption standards in Local Plans. The Local Plan could set the tighter standard such that new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

We would recommend that the LPA considers the concept of the Water Sensitive Urban Design (WSUD). This concept should be woven throughout the whole Local Plan and includes elements of each of the below topic headings (although it is not limited to these). The following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning: [CIRIA Water Sensitive Urban Design in the UK - Ideas Book \(susdrain.org\)](https://www.susdrain.org/).

Water quality

A high quality water environment is an integral part of the natural environment, providing rich habitats for species and quality of life benefits for local people. Water also supports economic growth, by supporting households, industries, agriculture, recreation and tourism.

A high quality water environment makes places attractive to live in, providing a valuable local amenity with related physical and mental health benefits. The water environment also supports our resilience to climate change, as areas of water and water storage, and associated green space, helps to reduce flood risk and provide urban cooling during periods of high summer temperatures

Where it is not properly planned for, new development can increase pressure on the water environment. Where development is properly planned it can provide opportunities to protect and enhance the water quality, amenity and biodiversity within a catchment.

Pressures on the water environment arise from point sources, such as waste water treatment works, and diffuse pollution sources such as urban water run-off.

The outcomes we want to see through Local Plans:

- **The quality of surface, ground and coastal waters and wetlands continues to improve for the benefit of people, the economy and wildlife.**
- **Protection and enhancement of the environment and promotion of multifunctional benefits such as climate change adaptation, delivery of RBMP objectives, flood risk management, including SuDS, and water quality etc**
- **Required infrastructure to support the delivery of Local Plan economic and housing targets.**
- **Avoidance of non-mains drainage private treatment options**
- **LPAs take a catchment scale approach to the water environment to develop their Local Plan policies, through the Duty to Co-operate and partnership working with utility companies, ourselves and neighbouring LPAs where appropriate**
- **Reduction in Combined Sewer Overflows (CSOs), reducing sewer flooding and protecting water quality.**
- **The LPA should ensure that development does not result in a deterioration in the operation of the existing sewage infrastructure, increased operation of CSOs or cause or increase sewer flooding**

Waste water treatment and the quality of the water environment should be addressed in the Local Plan to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality. Significant numbers of dwellings, other built development and associated infrastructure (e.g. roads) presents a potential risk to the water quality.

The Local Plan should address the challenge of increasing pressure on existing water management infrastructure (foul and surface water) to prevent detrimental impacts. The additional pressure that increasing development will put on the sewage network should be acknowledged and investment outlined to reduce the risk of combined sewer overflows (CSOs) and detrimental impacts on Water Framework Directive water quality measures and Bathing Water quality.

Whilst SuDS are an accepted method of dealing with surface water drainage and achieving water quality benefits, additional benefits such as addition habitat creation or tree planting could be included in such schemes and would contribute to the provision GBI and BNG.

Groundwater and contaminated land

Groundwater is an important resource that we rely on every day. It provides the majority of drinking water in some parts of the country; sustains baseflow and ecology in our rivers; and supports lakes and wetland ecosystems. Local plans can help to ensure that groundwater is protected and where necessary improved during regeneration and development.

Contamination in or on land can present unacceptable risks to human health and the wider environment, including to groundwater. Land contamination may be caused by previous land development such as former factories and mines, as well as existing activity such as petrol filling stations and waste management.

The outcomes we want to see through Local Plans:

- **Groundwater is protected and improved for the benefit of people and the economy**

- **Future developments are in appropriate locations where pollution and other adverse effects on the local environmental or amenity value are minimised.**
- **Local plan policies and strategies help to ensure that developing land affected by contamination won't create unacceptable risks, or allow existing ones to continue.**
- **Land is managed sustainably, protecting soils and water and contributing positively to reducing the impacts of and adapting to climate change.**
- **Local plan policies and strategies that support the delivery of River Basin Management Plans objectives through preventing deterioration of groundwater bodies and the remediation of contaminated land.**
- **Land is brought back into beneficial use using sustainable remediation techniques.**

Groundwater protection

Wyre Council includes a large area of principal aquifer – the Fylde Permo-Triassic Sandstone. This includes a number of public water supply abstractions and their related source protection zones (SPZs).

When allocating new development sites we advise that new buildings are located outside SPZ1 – the zone of highest vulnerability to pollution. Where this is not possible only the least polluting activities should be allowed, for example public green spaces could be orientated in these locations. We would encourage policy requirements to steer built development outside SPZ1.

Where mains surface water drainage is not possible, high quality SuDS will ensure developments within SPZ2 and 3 do not contribute to the pollution of controlled waters, including groundwater. These should be designed to be passive in order to prevent potential degradation in the event that maintenance is not carried out.

Reference should be made to 'The Environment Agency's approach to groundwater protection', February 2018 Version 1.2 - [The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684842/Environment_Agency_approach_to_groundwater_protection.pdf).

Contaminated land

Land contamination can adversely affect or restrict the beneficial use of land. Often development presents the best opportunity to successfully deal with these risks. Local Plans therefore have a key role to play in facilitating the improvement of land affected by contamination.

The North West River Basin Management Plan requires the restoration and enhancement of waterbodies to prevent deterioration and promote recovery of water bodies.

The remediation and reuse of contaminated land is an integral part of the improvement of water quality both for surface water and groundwater and, where consulted on development proposals on land affected by contamination, we will aim to secure a level of remediation in parallel with national criteria set in the Water Framework Directive. We will support policies which focus on requiring the re-use of brownfield and contaminated land sites and we will apply a risk based approach to ensuring appropriate and sustainable remediation actions are secured to improve water quality.

Reference should be made to detailed advice on the management of land affected by contamination can be found within our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health.

Waste

Non waste local plans should include 'good design' policies for new development that reduce the amount of waste produced in the construction phase and make the re-use and recycling of waste easier during the occupation phase.

Links should be made between reducing waste and tackling climate change by reducing carbon emissions.

We would also support policies that:

- seek to reduce the amount of construction and demolition waste
- encourage good site management and on site waste management plans
- promote the design of new development that enables the sustainable management of waste when the development is in use.
- include provision for the sustainable management of waste arising from all new developments
- promote the design of new development that enables the sustainable management of waste when the development is in use

Development proposals in proximity to regulated sites

We recommend that any new housing/sensitive development allocations are steered away from higher risk waste disposal and treatment facilities.

We would support policies that include buffers between regulated sites and new site allocations, and suggest development management policies are worded to protect regulated activity from new development.

Data requests

Environment Agency data can be obtained from www.data.gov.uk or by sending an information request to our local Customers and Engagement team (Inforequests.cmbInc@environmentagency.gov.uk).

Cross-boundary planning

The natural environment does not follow local authority boundaries. We therefore encourage LPAs to work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans. Cross-boundary working should form part of work under the Duty to Co-operate.

End

Intro

On 11 July 2019 Wyre Council declared a Climate Emergency. This recognises the severe impacts of climate breakdown and acknowledges the urgent need to act to prevent further damage. The new Local Plan Full Review enables us collectively to drive real change in responding to this climate emergency.

Wyre has committed to reduce carbon emissions by at least 78% by 2035, in line with the UK Government target and to reach net zero emissions by 2050.

Wyre's commitment ensures that all strategic decisions, budgets and approaches to planning decisions are in line with a shift to zero carbon by 2050 as far as Planning Laws allows.

In addition, we recognise Wyre have committed to monitor the advice of the Local Government Association, (and where possible implement) as to what steps can be taken quickly to have the greatest possible impact on air quality, a modal shift away from private cars, increased take up on public transport, and ensure that every aspect of the Councils activities are sighted on the need to preserve Wyre's ecological and environmental heritage.

Our response the Wyre Local Plan Full Review Scoping Consultation addresses a number of proposed issues to be considered for review along with Evidence Base Proposals in which to evaluate issued identified for review.

We welcome further opportunities for consultation.

Issues to be Considered

Health & Wellbeing

Air Quality

It is encouraging to read the positive impact a number of initiatives within Wyre has made on air quality within the Borough.

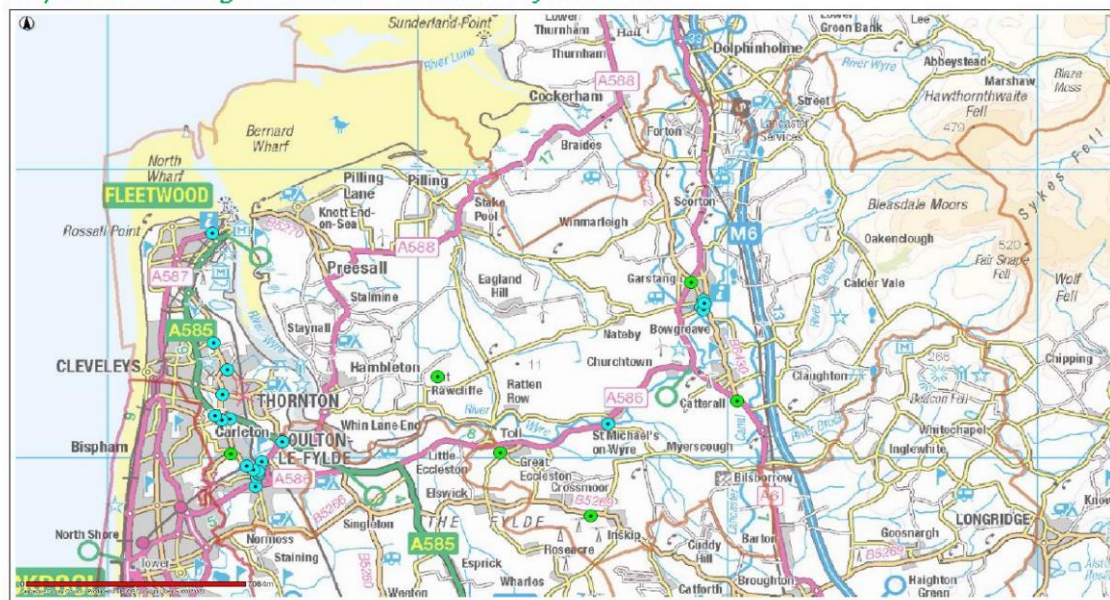
However, it is disappointing to note that no air quality monitoring infrastructure is in place along the A588 / B5377 corridor. With recent developments completed and future development planned along this corridor, gathering a base point of the air quality will enable effective monitoring to take place and assist in informing the likely impact future development within the area may have on air quality and subsequently impacts on health and wellbeing of the population along this corridor.

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; Gather and review data from Objective PMI45 aiming for a reduction in Co2 figures.

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011 – 31; Gather and review data from Objective PMI55 with a target of a minimum of 1 new AQMA for Over Wyre. This should then form part of data monitoring for Objective MPI54

The figure below denotes the locations of current Air Quality Monitoring Sites as outlined within the LAQM Annual Status Report 2020 with clear clusters around urban areas but excluding large parts of Over Wyre.

Map of Monitoring Locations within the Wyre District



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Source: LAQM Annual Status Report 2020

Accessing Health Care

The Over-Wyre Medical Practice is located in Preesall and is a dispensing practice which has recently seen the closure of its branch surgery in nearby Hambleton.

As detailed in the CQC report of 2018, there are 11,033 patients on the practice with a high number of patients over 65 years and six nursing homes in the locality which are served by the practice.

The surgery is housed in a privately owned purpose built building and offers access and facilities for disabled patients and visitors. The building was extended in 2017 to create more consulting rooms, waiting areas, a larger dispensary, and improved patient access.

The practice opens from 7.15am to 6.30pm Tuesday to Friday and 7.15am to 8pm on Mondays. Extended surgery hours are available in Fleetwood which has poor to practically non existing at times, public transport access from Preesall.

The CQC has rated our Practice as outstanding which is testament to the quality of staff and medical professionals we have available to us at the Practice.

Overall rating for this service	Outstanding ☆
Are services safe?	Good ●
Are services effective?	Outstanding ☆
Are services caring?	Good ●
Are services responsive to people's needs?	Good ●
Are services well-led?	Outstanding ☆

The Practice does however have a number of challenges it continues to face, mainly availability of appointments and service provision for a growing population.

Access to Health Care is a key issue which should be considered as part of the WLP review.

Evidence Base Proposal for WLP Review – Consultation with Over Wyre Medical Centre to assess the capacity of the Medical Practice to continue delivering outstanding service provision with an increasing population

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; PMI 22 – to consider setting a target for financial contributions through CIL and / or S106 towards health care.

Healthy Living

Access to public rights of way is just one tool to enable people to access open spaces and maintain / improve their physical and mental health. Although we have a number of public rights of way within the area, protecting these whilst also permitting future development is critical. Where appropriate, the creation of additional PROW should be considered as part of the WLP Review

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; Gather and review data from Objective PMI38 with a target to maintain and increase PROW access across Preesall and Knott End with feeder routes across Over Wyre and Urban areas.

In addition, the review of the WLP should aim to maintain a high quality of life by maintaining and enhancing provision for open space, sports and recreation as well as ensuring that Wyre has a broad range of community facilities and leisure activities.

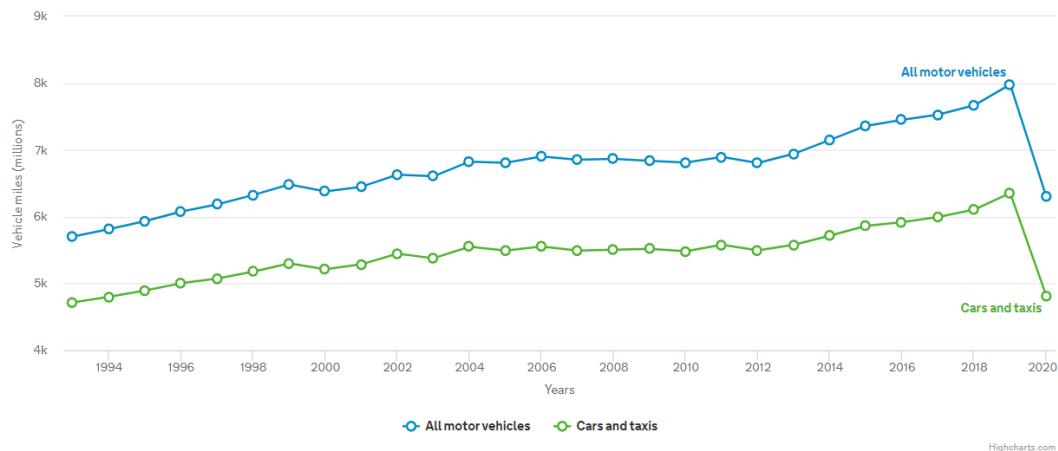
Highway Network

Increase in traffic

As demonstrated in the figure below, traffic within Lancashire is on the increase.

Annual traffic by vehicle type in Lancashire

Traffic in Great Britain from 1993 to 2020 by vehicle type in vehicle miles (millions)



Whilst historically significant, the long term trends can be misleading in most cases due to the extraordinary circumstances observed as a result of the coronavirus pandemic. Vehicle miles travelled in Great Britain have had year-on-year growth in each year between 2010 and 2019. However, the sharp decrease in 2020 has resulted in traffic estimates that are lower than the 2010 levels. Therefore, to say traffic has fallen over the last decade would misconstrue, as the overall decrease is entirely due to the decline in traffic levels observed in the 2020 estimates.

Source: <https://roadtraffic.dft.gov.uk/local-authorities/76>

Rural areas such as Preesall & Knott End are no exception to this trend. Using data available via roadtraffic.dft.gov.uk, more specifically count point 806252, the data demonstrates a similar pattern to the chart above but at a more localised level. Count point 806252 is located on park Lane (B5377) in close proximity to its junction with Sandy Lane which forms a key pinch point of traffic for our villages. Data leading up to 2019 from this count point, shows a gradual increase similar in proportion to that in the figure above. Since 2019, we have had further housing development within Preesall and Knott End which will have undoubtedly added to this increase.

Evidence Base Proposal for WLP Review – To undertake further analysis of local count point data to assist in assessing the impact existing recent developments have had on increased traffic. This should be compared with projected traffic increase figures provided at planning application stage. Consideration should also be given to seasonal fluctuations.

By sheer nature of our rural location, public transport provision is not at the level of availability as it is for our urban neighbours across Shard Bridge.

By continuing to build in rural areas, without an increase in public transport, traffic levels will undoubtedly increase.

Evidence Base Proposal for WLP Review – Data gathering of public transport use within the area and investigate where improvements could assist in reducing reliance on private motor vehicles.

To minimise the distance people need to travel, and to make walking and cycling the first choices of travel.

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; Gather and review data from Objective PMI21 and set targets for new dwellings to be approved within 1km of key services.

Wyre Council have previously concluded constraints by the highway network led to a position whereby Wyre considered that it was unable to meet in full its housing need of 479 dpa over the plan period 2011-2031. Although the housing need figures have now been reduced, there is sufficient evidence to demonstrate how fragile our highways network is in accommodating additional traffic.

Condition of our Highways

Over Wyre is not unique in that we have a large number of pot holes with more continually developing, but there have been considerable delays in undertaking repairs to large parts of our local network. Reporting pot holes is a relatively simple process with the availability of online reporting, however the increase of traffic within our area puts continued strain on the condition of our Highway network leading to considerable investment required to facilitate quality and lasting repairs.



Evidence Base Proposal for WLP Review – Asset condition survey to be undertaken of the Highway Network throughout Over Wyre to identify crunch points to consider when reviewing potential areas for development.

Education

We are proud to have a excellent quality education provision within Preesall and Knott End. Students from our area often progress to achieve great things with many of our students gaining coveted university places up and down the country.

As good as our local schools are, there are only a finite number of places available for each school year.

Is our local education provision ready and able to offer additional places which new development would bring?

Evidence Base Proposal for WLP Review – Review of data to establish the number of students missing out on local provision and ascertain the capacity within local education to cater for future development.

Flood Risk and Surface Water Management

We have an active local Flood Action Group who proactively work within the community to protect residents and their property.

With new development, there is always the question of Environmental Impacts.

In establishing issues to be considered as part of the WLP review, Flood Risk and Surface Water Management should be high upon the list of considerations.

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; Gather and review data from Objective PMI48 & PMI49 and ensure the target remains at zero ensuring no planning permissions are granted contract to Environment Agency advice in areas at risk from flooding or water quality grounds.

New Developments

National Policy NPPF 2021 – supported by Planning Policy Guidance (PPG) provides for objectively assessed needs or housing unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

We welcome the decision taken by Wyre to adopt the ‘standard method’ in calculating local housing need during the WLP Partial Review.

From information available, the Council has not been asked by any neighbouring planning authority to take unmet housing need.

The Council’s adopted Local Plan’s housing need figure as outlined within the current WLP is higher than that produced by the standard method and Policy HP1 has been amended to include revised calculations for housing need.

Although we can not ignore there is a housing need, not just within Wyre, but Nationally, we would ask that all issues identified above in this document are considered when identifying suitable locations for future development.

Evidence Base Proposal for WLP Review – Performance Monitoring Indicator (PMI) from WLP 2011-31; - PMI23 – review financial contributions through CIL and / or S106 and measure impact of the effectiveness of such contributions.

10th March 2022



Planning Policy
Wyre Borough Council
Civic Centre
Breck Road
Poulton-le-Fylde FY6 7PU

Our ref: APPL122

By email only

Dear Sir or Madam,

**FULL REVIEW OF THE WYRE LOCAL PLAN
SCOPING AND CALL FOR SITES CONSULTATION (REGULATION 18)**

Smith & Love Planning Consultants is instructed by our client Applethwaite Ltd (“Applethwaite”) to submit the following comments on the scope of the proposed Full Review of the Local Plan and site in response to the Call for Sites. Our client has the controlling long-term interest in a 6.4 ha parcel of land to the west of Garstang Road at Bowgreave. The extent of the interest is shown on the location plan enclosed with these comments and Call for Sites nomination form. The site is promoted as a highly-sustainable land allocation opportunity for high quality housing with the potential to accommodate exclusively age-restricted specialist bungalows for older people and/or mixed two storey housing development.

The site is highly suited for housing development being located on the settlement edge of Bowgreave which is a popular housing location for both older person and family households, with access to a wide range of local community facilities and services. The site has no overriding technical and environmental constraints which cannot be appropriately mitigated and is flat and readily developable. Applethwaite has prepared the enclosed preliminary indicative layout to show how development can be appropriately accommodated within the site and the expected number of dwellings (bungalows shown) it can yield. The layout respects the physical and planning policy context of the site by incorporating an extensive area of public open space along its northern edge to provide an appropriate buffer to the Lancaster Canal and green edge to Garstang, as well as preventing harm to the spatial function and integrity of the Garstang - Bowgreave Area of Separation (Policy SP1).

The preliminary indicative layout also illustrates the retention and provision of trees, hedgerows and green infrastructure within the development area, and taking account of the utility easement (water main) crossing the site. The site has direct frontage to Garstang Road from which safe and suitable vehicular access is proposed for the 30 mph speed limit.

Spatial policy

The site lies adjoins the settlement edge of Bowgreave which is a defined Main Rural Settlement (Tier 4) and lies adjacent to Garstang which is a Key Service Centre (Tier 2) in the Wyre settlement hierarchy per Policy SP1 of the adopted Local Plan, and thereby a sustainable and suitable location for an appropriate level of housing growth to accommodate the strategic needs of the Borough for the Local Plan Full Review period.

Smith & Love Planning Consultants, Rational House, 32 Winckley Square, Preston PR1 3JJ
tel. | www.smithlove.co.uk

Registered in England | Company No: 08449131 | Unit 16 Eastway Business Village, Fulwood, Preston PR2 9WT



It is acknowledged that the site lies within the Area of Separation between Garstang and Bowgreave however development can be accommodated, as shown by the preliminary indicative layout, without compromising its function and integrity in maintaining the separate identity of the settlements and clearly will not result in their merger.

The site forms a logical fit and rounding-off of the urban form and settlement edge at Bowgreave and can be fully integrated with pedestrian, cycle and highway connections.

Accessibility

The site is a highly accessible and sustainable location with pedestrian and cycle access to facilities in Bowgreave and Garstang and public transport bus stops on Garstang Road with 30 minute services to Garstang town centre, Blackpool and Lancaster and Preston city centres which also provide access to the national rail network.

Technical and environmental considerations

There are no known technical and environmental constraints which will prevent or limit residential development at the site and due diligence land searches to date, confirm that:

- The site lies entirely within Flood Zone 1 and there are no known surface water and foul water drainage constraints;
- There is no evidence of any protected habitat and species (flora and fauna) within the site including trees and hedgerows and the adjacent off-site pond;
- There is no known history or likelihood of ground contamination or adverse ground conditions;
- There is a limited number of trees and hedgerows within and around the perimeter of the site, none of which are protected, and all of which (subject to further assessment) can be retained and incorporated into the development area as shown by the preliminary indicative layout; and,
- There are no heritage constraints to development in terms of designated listed buildings and conservation areas. There is a Grade II listed milestone on Garstang Road which will not be affected and any visual harm to the setting (significance) of the Grade II listed canal bridge to the north of the site will be negligible and can be mitigated.

In summary, the site identified and proposed by Applethwaite is a highly assessable and sustainable land allocation opportunity for high-quality housing development to meet (most likely) the specialist housing needs of older people arising during the Local Plan Full Review plan period and/or general market housing needs and affordable needs. The proposed type and scale of residential development is fully aligned with the Wyre settlement hierarchy and spatial development strategy of the adopted Local Plan, and will not undermine the function of the Garstang and Bowgreave Area of Separation. Development can be accommodated in a quality landscaped setting and fully integrated into the urban form and fabric of the adjacent urban area via pedestrian and cycle connections.

Applethwaite hopes its proposal and nomination is of interest to the local planning authority and welcomes the opportunity to discuss and explain the proposal further as the Local Plan Full Review progresses.

Scope of the Full Review of the Wyre Local Plan

Applethwaite has no major comments on the scope of the Full Review at this stage and expects the scope to largely replicate the scope and content of the adopted Local Plan.

Housing is a significant issue however and the scope, together with the evidence base, must ensure that local housing need is robustly assessed and the capacity to accommodate housing growth at Bowgreave as part of the wider Garstang and A6 corridor settlement area, is fully assessed. The transport evidence which informed and resulted in the previous 'highway-cap' constraint applied to the adopted Local Plan, must be reviewed afresh as following the M6 Junction 1 improvements and the construction of M55 Junction 2 and the Preston West Distributor Road which will be open and fully operative early within the Full Review Local Plan period.

The need for a wider and more diverse range of suitable and specialist housing to meet the needs of older people arising during the Full Review Local Plan period must also be fully assessed and planned for. It has been confirmed by the local planning authority officers and Members in connection with recent planning applications by Applethwaite for age-restricted specialist housing for older people in Wyre, that there is a strong market demand for quality bungalows built to Part M4(2) standards to offer retired people an alternative choice to second hand (existing non-specialist) bungalow stock and Category II retirement housing communal apartments.

Summary

We trust that these comments and the nominated housing allocation site opportunity at Garstang Road, Bowgreave are helpful and will be of interest to the local planning authority, and will be considered and taken into account in preparing the Local Plan. We look forward to the next opportunity for engagement and consultation and would be very happy to meet and discuss this opportunity with the local planning authority in the meantime.

I look forward to receiving confirmation of receipt of this submission and should you have any questions, please do not hesitate to contact me.

Yours sincerely

Bryanni Lane MRTPI

Enc.

Date: 10 March 2022
Our ref: 382184 / 9002
Your ref: .



Planning Policy Team
Planning Policy & Economic Development
Wyre Council

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

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Dear Sir / Madam

Wyre Local Plan Full Review Scoping Consultation: Public consultation under Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012

Thank you for your consultation on the above dated 26 January 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcome this opportunity to comment on the new Local Plan for Wyre. In preparing your new Local Plan the protection, conservation and enhancement of Wyre's natural assets should be a key issue of the Local Plan.

Natural England would expect biodiversity, geodiversity, ancient woodlands, soils, priority habitats, ecological networks and protected species to be covered under the heading of the natural environment. Please see Annex 1 below for further sources of Local Plan evidence relating to the natural environment, and for additional advice and guidance that will aid your considerations and decisions with regard to emerging development options and land uses.

The advice within this letter will provide a steer of key areas that we would expect to have been considered and assist you with your own screening exercise for the Local Plan scope, issues and options. Please make use of Natural England's Impact Risk Zones (available on the [Magic Map tool](#)) and Green Infrastructure Mapping Tool as these are valuable resources for the next stage of your Plan.

Vision

Natural England advise that the new Local Plan's Vision and emerging development strategy should address impacts on and opportunities for the natural environment, and should set out the environmental ambition for the plan area.

The new Local Plan should take a strategic approach to the protection, restoration and enhancement of the natural environment, including providing a net gain for biodiversity, and the consideration of opportunities to enhance and improve connectivity, along with improved access to nature and greenspace. Nature based solutions (NbS) to climate change mitigation and adaptation should also be considered within the new Local Plan's strategic approach.

Where relevant there should be linkages with the Local Nature Partnership, Rights of Way Improvement Plans (including the England Coast Path), Green Infrastructure Strategies, and the Nature Recovery Network (NRN) as it emerges through the Local Nature Recovery Strategy (LNRS).

Objectives

Natural England would welcome the inclusion of strategic objectives relating to the Natural Environment and Climate Change. Natural England would like to see any such objectives being measured by specific targets.

Strategic Objectives relating to Climate Change could be strengthened by the inclusion of wording which promotes NbS to climate change. The natural environment can play a vital role in tackling the climate crisis and contributing to Net Zero goals, as healthy ecosystems take up and store a significant amount of carbon in soils, sediments and vegetation.

Tree planting and peatland restoration are the biggest opportunities for NbS, although many habitats and ecosystems can contribute to carbon storage and sequestration. New woodland takes up carbon from the atmosphere via photosynthesis and peatland restoration stops Greenhouse Gas (GHG) emissions from the oxidation of degraded peat. Please see our comments below regarding the role peat plays in capturing and storing carbon.

NbS can also reduce risks to people from climate change (often termed Ecosystem-based Adaptation), for example through natural flood management and urban cooling from green and blue infrastructure. NbS can also contribute to reducing net GHG emissions as part of the government's wider strategy for achieving Net Zero GHG emissions by 2050, which is a statutory requirement for the UK and England. This will require major changes in the way we manage the natural environment, alongside changes in energy, transport and other sectors.

NbS describe actions that address societal challenges, such as climate change, in ways that benefit both people and biodiversity. Not all environmental management for Net Zero is true NbS and not all NbS deliver climate change mitigation. As per our comments above, woodland creation and peatland restoration offer the largest potential contributions to Net Zero. Please see Natural England's April 2021 report [Carbon Storage and Sequestration by Habitat 2021](#) (NERR094) for further details.

Biodiversity

We advise that the Local Plan should set out a clear strategy for the protection, restoration and enhancement of biodiversity. Local Plan policies should seek to deliver a coherent and high quality ecological network, and to protect, restore and enhance the most valuable habitats and species. Please see our comments above regarding the NRN / LNRS.

The importance of Functionally Linked Land (FLL) as supporting habitat for species which are designated features of protected sites should be recognised within the Local Plan, and we advise that FLL remains a key issue within Wyre. Consideration should also be given to recreational disturbance and impacts on designated sites.

The new Local Plan should also consider biodiversity net gain (BNG). Natural England note that ten per cent BNG is mandated by the recently passed Environment Act 2021, and that a [public consultation](#) is currently underway in relation to the Regulations and Implementation of BNG which will determine how this will work in practice.

Natural England would welcome the creation of a specific BNG policy within the Local Plan, and we advise that your authority may wish to learn the outcome of the above consultation for further guidance on how BNG should be embedded within Local Plans to inform such a policy.

Peat

Natural England note that Wyre Council's administrative area contains large areas of peatland which are not insignificant. We advise that the implications of both development on peat and in respect of carbon emissions from development and inappropriate management should be considered within the Local Plan.

The [England Peat Action Plan](#) was published by Defra in May 2021. It contains the following ambition:

We want our peatland to meet the needs of wildlife, people, and the planet. All uses of peatland should keep the peat wet and in the ground. We will work to ensure all our peatlands, not just deep or protected peat, are responsibly managed, or, in good hydrological condition or under restoration management.

England's peatlands are our largest terrestrial carbon store and are vital for capturing and storing carbon. They provide a range of other valuable benefits including biodiversity-rich ecosystems; improved water quality and natural flood management; the protection of historic environment features; and connecting people with nature.

Following the publication of the England Peat Action Plan and the results of a number of peat pilot projects, Natural England have a better understanding of the impact of carbon loss from damaged and unmanaged peat, as well as the opportunity costs of not restoring peat as a functioning ecosystem. We would welcome further discussions with Council in this regard. Please see Annex 1 for further information relating to Blanket Bog as a Priority Habitat.

Green Infrastructure

Natural England would welcome the inclusion of an overarching GI policy within the new Local Plan, which may wish to set out the use of GI as having a key role in protecting the environment; supporting biodiversity, habitats and nature conservation; and in combatting the effects of climate change.

Natural England advises that the [Accessible Natural Greenspace Standard](#) (ANGSt) could be a useful tool to use when assessing Open Space and Residential Development. Please see Annex 1 for further details. An updated ANGSt will be published in 2022.

We would also welcome the development of a Trees, Woodland, Hedgerows and Landscaping policy, which should seek to protect and enhance existing trees, woodlands and hedgerows and encourage the creation of additional tree cover in appropriate locations.

Please see our comments above regarding NbS (and also Natural England's April 2021 report [Carbon Storage and Sequestration by Habitat 2021](#) (NERR094), noting that the forthcoming LNRS will set out the local approach to habitat creation and enhancement.

We advise that any additional tree cover should be planned and planted appropriately. The recently published [England Trees Action Plan 2021- 2024](#) recognises the value of woodland planting: It also recognises that:

Woodlands and peatlands are two of our largest natural climate regulating ecosystem types; our climate change and biodiversity obligations require us to manage them both sustainably. Plans to expand woodland cover and to restore peatland need to work hand in hand which is why we have aligned the England Trees Action Plan with the England Peat Action Plan to deliver a more joined up approach to land use management. We should only plant or naturally establish trees where doing so provides a net benefit to the environment.

Woodland creation should be located on poor agricultural land, and urban/urban fringe land to derive maximum multifunctional benefits. Natural regeneration should be encouraged particularly when located adjacent to existing woodlands to deliver extra wildlife benefits from scrub development.

Where there are inappropriate existing forestry plantations on former priority habitat (e.g., heathland, peatland, ancient woodland sites) local plans should seek to restore these habitats by supporting plantation removal.

Sustainability Appraisal (SA) & Habitats Regulations Assessment (HRA)

Natural England provided a response to the *Emerging Evidence Consultation - Implementation of LPR1* which was undertaken in connection with the recent Wyre Local Plan Partial Review on 18 January 2022, when we reviewed the following documents:

- Schedule of Revisions to the Wyre Local Plan (2011-2031) (November 2021);
- Sustainability Appraisal of the Wyre Local Plan Partial Review: Sustainability Appraisal Report (Arcadis, November 2021); and
- Habitats Regulations Assessment of the Wyre Local Plan Partial Review: Screening Report (Arcadis, November 2021).

Natural England had no objection to the proposed schedule of revisions and we concurred with the conclusions of the Sustainability Appraisal Report and the Habitats Regulations Assessment Screening Report.

Natural England note that the SA and HRA for the new Local Plan will be prepared as the emerging Plan progresses, and we will provide further comments at the scoping and screening stages for these documents when they become available.

We trust that this is in order, but if you have any queries relating to the advice in this letter please contact me on 020 8720 4139, or via the email address below. For any new consultations, or to provide further information on this consultation, please send all correspondence to consultations@naturalengland.org.uk.

Yours faithfully

Amy Kennedy MRTPI

Senior Adviser – Strategic Plans for Places

Cheshire, Greater Manchester, Merseyside and Lancashire Area

Team

Annex 1:

Sources of Local Plan evidence of the natural environment

Landscape

Natural England expects the Plan to include strategic policies to protect and enhance valued landscapes, as well criteria-based policies to guide development.

Impact Risk Zones (IRZs)

Natural England publishes a set of mapped Impact Risk Zones (IRZs) for Sites of Special Scientific Interest (SSSIs) and European Designated Sites. This helpful GIS tool can be used by LPAs and developers to consider whether a proposed development is likely to affect protected sites and determine whether they will need to consult Natural England to seek advice on the nature of any potential impacts and how they might be avoided or mitigated. Further information and guidance on how to access and use the IRZs is available on the [Defra website](#).

The IRZs are available on the [Magic Map tool](#) which we advise you utilize in order to aid your screening of the proposed allocations as there is a vast array of information that is relevant to the environment including designated sites, protected species licences, and priority habitats.

Designated sites

The Local Plan should set criteria-based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites¹. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites² should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 105 of the Conservation of Habitats and Species Regulations 2017 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, which will usually need to be considered as part of an Appropriate Assessment, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

Natural England would welcome early discussion on the Habitats Regulations Assessment (HRA) of the plan and can offer further advice as policy options are progressed.

Biodiversity and Geodiversity

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). Planning policies and decisions should contribute and enhance the natural and local environment, as outlined in para. 174 of the NPPF. Plans should set out the approach to delivering net gains for biodiversity. Net gain for biodiversity should be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure.

¹ International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹. National sites include Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs) Local sites include wildlife Sites or geological sites (a variety of terms are in use for local sites).

² The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

Priority habitats, ecological networks and priority and/or legally protected species populations

The Local Plan should be underpinned by up-to-date environmental evidence. This should include an assessment of existing and potential components of local ecological networks. This assessment should inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and inform opportunities for enhancement as well as development requirements for particular sites.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here: [Habitats and species of principal importance in England](#). Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here [Standing advice for protected species](#). Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species.

Ecological networks are coherent systems of natural habitats organised across whole landscapes to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds. Local ecological networks will form a key part of the wider Nature Recovery Network proposed in the 25 Year Environment Plan. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks.

Planning positively for ecological networks will also contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 175 of the NPPF.

Where a plan area contains irreplaceable habitats, such as ancient woodland, ancient and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland, ancient and veteran trees.

Priority Habitat – Blanket Bog

To strengthen the Local Plan further reference could be made to the NPPF (para 180c) that specifies: *“development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran tress) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*.

Blanket Bog is an irreplaceable habitat and should be carefully considered when preparing your Local Plan. All deep peat (40cm or deeper) is understood by Natural England to be Blanket Bog. As there may be deep peat in the your Local Plan area that is currently not mapped as Blanket Bog, we recommend that further investigation is carried out to determine the areas of deep peat and priority habitats for this area.

Sites of Least Environmental Value

In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.

Coastal issues

Natural England expects the Plan to identify a Coastal Change Management Area and set out the type of policies and developments that would be appropriate in it. The PPG gives guidance on how to define a Coastal Change Management Area as follows:

“Coastal Change Management Area will only be defined where rates of shoreline change are significant over the next 100 years, taking account of climate change. They will not need to be defined where the accepted shoreline management plan policy is to hold or advance the line (maintain existing defences or build new defences) for the whole period covered by the plan, subject to evidence of how this may be secured”.

We would also expect the plan to consider the marine environment and apply an Integrated Coastal Zone Management approach. Where marine plans are in place, local plans should also take these into account. More detail about marine plans can be found here, including details on marine plans, which have been finalised: <https://www.gov.uk/guidance/explore-marine-plans>.

The plan should refer to the relevant Shoreline Management Plan and take forward applicable actions. Local Authorities should use Shoreline Management plans as a key evidence base for shaping policy in coastal areas.

The draft North West Marine Plan is currently a live formal consultation, as such it is a material consideration and upon adoption will become a statutory planning document. You should therefore have consideration for the draft North West Marine Plan, where appropriate. Further information on the draft North West Marine Plan can be found here: <https://www.gov.uk/government/publications/draft-north-west-marine-plan-documents>.

Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. Sustainable coastal management needs to embrace long-term change and achieve positive outcomes for both. Local Plans should therefore provide for coastal adaptation and work with coastal processes.

Plans within coastal areas should recognise the need to respond to changes over long timescales and adopt an integrated approach across administrative and land/sea boundaries. A successful integrated approach should set levels of sustainable levels of economic and social activity whilst protecting the environment.

We would also advise that Local Plans should help facilitate the relocation of valued environmental assets away from areas of risk.

Green Infrastructure

Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para. 175 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy.

We encourage the provision of green infrastructure to be included as a specific policy in the Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Please note that Natural England are currently developing a national Framework of Standards for Green Infrastructure, which is a vital contribution to the delivery of the Government's 25 Year Environment Plan. Research within the project has identified key benchmarks that are informing a concurrent update of ANGSt.

Prior to the launch of full GI Framework in 2022, the following elements are now live (at <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Home.aspx>) and immediately available to support local authorities in refreshing their local plans:

- Green Infrastructure Principles which underpin the Framework and set out the Why, What and How to do good GI; and
- Green Infrastructure Mapping Database - Beta Version 1.1: A baseline of GI across England with multiple data sets that assist in planning GI strategically at different scales, and targeting investment where it is most needed.

The remaining elements of the Framework are under development and will be published in 2022.

Access and Rights of Way

Natural England advises that the Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 100 of the NPPF. Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network. The plan should seek to link existing rights of way where possible and provides for new access opportunities. The plan should avoid building on open space of public value as outlined in paragraph 99 of the NPPF.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 98 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Soils

The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan should safeguard the long-term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 174.

Air pollution

We would expect the plan to address the impacts of air quality on the natural environment. It should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and

the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from *local impacts* are those within 200m of a road with increased traffic³, which feature habitats that are vulnerable to nitrogen deposition/acidification. [APIS](#) provides a searchable database and information on pollutants and their impacts on habitats and species.

Tranquillity

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraphs 102 and 185 of the NPPF.

Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available [here](#) and are a helpful source of evidence for the Local Plan and SEA/SA.

Water Quality and Resources and Flood Risk Management

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 174 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 159-169 of the NPPF.

The Local Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must have regard to these plans in exercising their functions.

The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network.

Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.

Climate change adaptation

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects.

In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

The Natural England and RSPB [Climate Change Adaptation Manual](#) (NE751 Edition 2, April 2020) provides evidence to support nature conservation in a changing climate.

Natural England's [National Biodiversity Climate Change Vulnerability Assessment \(England\)](#) (October 2020) is a GIS model that provides an assessment of the vulnerability of priority habitats to climate change based on principles of adaptation for biodiversity. It identifies why areas are vulnerable and which possible interventions can have the biggest impact in increasing resilience to the changing climate.

We would also draw your attention to Natural England's newly published [Carbon Storage and Sequestration by Habitat 2021](#) report (NERR094 Edition 1, April 2021), along with the Marine Management Organisation (MMO) GIS data relating to '[Saltmarsh Potential \(MMO\) – Potential habitat creation sites within floodplain](#)', which may identify some areas within Wyre's administrative area.

³ The ecological effects of diffuse air pollution (2004) English Nature Research Report 580
Design Manual for Roads and Bridges Volume 11, Section 3 Part 1 (2007), Highways Agency

Note that the areas may need to be site checked for their suitability depending on what they are used for. This dataset was developed through the MMO's ['Identifying sites suitable for marine habitat restoration or creation'](#) project (ref. MMO1135).

Natural Capital and Ecosystem Services

A natural capital approach to policy and decision making considers the value of the natural environment for people and the economy. The Department for Environment, Food & Rural Affairs (Defra) have published numerous resources (including data, guidance and tools) within their ['Enabling a Natural Capital Approach \(ENCA\)'](#) toolkit to assist policy-makers and practitioners in understanding natural capital and how to take it into account.

You may also wish to refer to Natural England's ['National Natural Capital Atlas'](#) (February 2020), which displays the quantity, quality, and location of natural assets across England, linked to the provision of ecosystem services. The maps show which areas need continued support and protection, and where there are opportunities for enhancement, enabling policy-makers to help ensure that nature-based solutions are located in the optimal place.