

Publication Draft Wyre Local Plan 2017

Statement of Consultation

Appendix 9 – Issues and Options Response to Main Matters – Local Plan Response

Topic/Issues	Initial Response July 2016	Local Plan Response September 2017
<p>INFRASTRUCTURE</p> <p>There is a lack of, inappropriate or insufficient local infrastructure, especially schools and health facilities, to support the level of residential development proposed. Specific concerns raised included sewage, electricity, internet service, road safety, police and fire services and access to hospitals.</p> <p>Infrastructure should be delivered before development takes place.</p> <p>Infrastructure should be paid for by developers.</p> <p>Development must be proportionate and bring with it the infrastructure improvements that are already required.</p>	<p>The Council appreciate that many communities feel that the existing infrastructure – especially health and education - is insufficient to meet current needs and hence will not be able to cope with additional strain caused by increased development. As part of developing the Local Plan, the council are required to plan for future population needs and work with infrastructure providers to identify how services and facilities can support additional development. It is also worth noting that new development can often support existing services. This work will be detailed in an Infrastructure Delivery Plan (IDP) which will be published along with the Draft Local Plan. The IDP will cover all infrastructure including local highway network, waste water disposal, clean water provision, electricity provision, public transport, broadband provision and fire and police service</p> <p>It is not always appropriate to provide all necessary infrastructure to support a development proposed in the Local Plan in advance of the development commencing. Where necessary infrastructure will be provided in advance of the development. It is not possible in all cases that development can finance all infrastructure required. Development contributions</p>	<p>The council has prepared the Infrastructure Delivery Plan (IDP) in consultation with infrastructures providers. The issues raised at the consultation were considered as part of the preparation of the IDP.</p> <p>The IDP sets out the infrastructure necessary to support development proposed in the Local Plan.</p> <p>The IDP has informed the Local Plan which includes specific infrastructure requirements in relation to certain allocations.</p>

	<p>towards infrastructure requirements need to take account of viability.</p> <p>New development cannot be asked to pay for existing infrastructure needs. However often new infrastructure required as part of new development addresses also existing infrastructure issues.</p>	
<p>HIGHWAY NETWORK (1) There is a lack of capacity within the strategic highway network (e.g. A585(T)) to support the level of residential development proposed.</p> <p>A new and faster route to the M55 should be considered.</p>	<p>The Council recognise the limitations of the existing strategic highway network and is working closely with Highways England (HE) and the Local Highway Authority (LHA) - Lancashire County Council to address these concerns. This work involves considering the capacity and potential deliverable improvements to road infrastructure to support growth. Where improvements to the network are required this will be set out in the Infrastructure Delivery Plan (IDP) which will accompany the Local Plan. The IDP will include information about how any improvements will be funded and delivered.</p> <p>With regards to the A585, in December 2014 the Government announced a new major scheme to bypass Little Singleton. HE is currently working in considering design options for the scheme taking into account development needs in the Wyre. Public consultation on Options will be undertaken by Highways England in Summer 2016.</p> <p>The Fylde Coast Highways and Transport Masterplan is the appropriate vehicle to consider alternative routes to the M55. The</p>	<p>The evidence that has informed the Local Plan has been prepared by Highways England and Lancashire County Council as Highway Authority (LCC). The evidence considers the capacity of the strategic network (i.e A585 and motorways) and the local highway network within the between settlements.</p> <p>The Local Plan takes account of highway constraints and includes requirements for development contributions toward highway improvements where appropriate. The Infrastructure Delivery Plan (IDP) sets out the highway infrastructure needed to support the Local Plan and how this will be delivered. Highways England and LCC have been involved in the preparation of the IDP.</p>

	<p>current Masterplan adopted in July 2015 identifies a North Fylde Coast Connectivity Study to be completed 16/17.</p>	
<p>HIGHWAY NETWORK (2) The level of growth cannot be supported by a local road network deemed to be inappropriate as a result of matters such as congestion and a lack of capacity (particularly along the A6), bad junctions, narrow roads, bridges, no pavements, conflict with other uses including schools, safety and access.</p> <p>Need to improve public transport or encourage walking and cycling. Safe cycle paths should be provided separate to the road itself.</p> <p>Accepting that road traffic will increase is contrary to words on environmental, sustainability and health.</p>	<p>The Council is working with the Local Highways Authority (LHA) - Lancashire County Council to consider the capacity of the local highway network to support growth. The work will also establish necessary deliverable improvements to the Local Highways Network. A Report is being prepared which will be published with the Local Plan. In allocating land for development the council will need to demonstrate that such sites are capable of being delivered for the use and scale of development proposed taking into account the impact on the highway network. Government policy stipulates that development should only be prevented if residual cumulative impacts are ‘severe’. The Council will produce an Infrastructure Delivery Plan (IDP) that identifies any necessary infrastructure improvements (including road improvements) that are necessary to support proposed developments. The IDP will include information about how any improvements will be funded and delivered and will be published alongside the Local Plan.</p> <p>The adopted Fylde Coast Highways and Transport Masterplan consider public transport and other sustainable modes of travel. It is the appropriate vehicle to consider new cycle ways and public transport provision. The Local Plan will include</p>	<p>The evidence that has informed the Local Plan has been prepared by Highways England and Lancashire County Council as Highway Authority (LCC). The evidence considers the capacity of the strategic network (i.e A585 and motorways) and the local highway network within the between settlements.</p> <p>The Local Plan takes account of highway constraints and includes requirements for development contributions toward highway improvements where appropriate. The Infrastructure Delivery Plan (IDP) sets out the highway infrastructure needed to support the Local Plan and how this will be delivered. Highways England and LCC have been involved in the preparation of the IDP.</p> <p>Policy CDMP6 includes requirements for safe vehicular, pedestrian and cycle access to and from and circulation within a site.</p> <p>The Local Plan is supported by a Sustainability Appraisal.</p>

	<p>policies supporting the provision for cycling and walking in new developments.</p> <p>The Local Plan will be accompanied by a Sustainability and Health Impact Assessments.</p>	
<p>PUBLIC TRANSPORT</p> <p>Public transport is limited or non-existent and so cannot support sustainable growth. New development should be served by increased (bus) services.</p>	<p>The council acknowledge that in some areas of the borough – particularly smaller rural settlements – there is a lack of or limited public transport options. The provision of public transport will be taken into account in considering how best to distribute development across the Borough. The council is required to promote sustainable development. Accessibility by choice of transport is one consideration but not the only one. It should be noted that the provision of public transport is not in the control of the Council. It is influenced by commercial decisions by individual operators and services need to be commercially viable. Additional development may potentially secure the viability of a service and also lead to enhancement of services.</p>	<p>In identifying land for development the council has sought to identify locations that as far as possible are within a reasonable proximity of existing bus routes and/or are served by, or can access basic local services, including education and health provision.</p> <p>Where the Local Plan proposes development in locations with limited facilities the proposed allocation includes requirements for additional services and facilities.</p>
<p>ACCESSIBILITY AND CONNECTIVITY</p> <p>Accessibility and connectivity would be improved by the provision of a motorway junction on the M6 near to Garstang and/or a railway connection to the West Coast Main Line, also at Garstang. This would support sustainable growth – particularly residential development in this area.</p> <p>There is a need for railway connection between PLF, Thornton and Fleetwood to improve accessibility and connectivity within the peninsula.</p>	<p>The Council has raised the proposition of a new motorway junction between junctions 32 and 33 with Highways England and is having discussion on this matter. The discussions will inform the preparation of the draft Local Plan. Discussions have also been held with Network Rail with regards to a new station to serve near Garstang.</p> <p>A GRIP 1 Study was undertaken in 2008. A GRIP 2 study however was not undertaken. Discussions with Network Rail are taking place to understand why a GRIP 2 study was not undertaken and what the position is regarding the feasibility of re-opening the</p>	<p>The Council has discussed the possibility of a new junction on the M6 near Garstang with Highways England and LCC as the Highways Authority. A Statement of Common Ground signed by Wyre Council, Highways England and LCC has been published and sets out the reasons that the construction of a new motorway junction in the vicinity of Garstang is not feasible or achievable within the Plan period.</p> <p>The Council has also held discussions with Network Rail which concluded that rail connection at Garstang is not an achievable solution within the Plan period.</p>

	<p>Poulton-le-Fylde to Fleetwood rail line for commercial services.</p>	<p>There is nothing in the Local Plan which would prohibit such a proposal from coming forward.</p> <p>The Council has also held discussions with Network Rail regarding the possibility of re-opening the Poulton-le-Fylde to Fleetwood rail line for commercial services. It was concluded that that this is unlikely to be achievable within the Plan period. There is nothing in the Local Plan which would prohibit such a proposal from coming forward. Although the re-opening of rail services to Fleetwood would improve accessibility and connectivity, the Local Plan is not depended on such services re-commencing.</p>
<p>NEED FOR ADDITIONAL HOUSING No need for more housing; there are enough houses for sale already. Houses are not selling. The housing market on the Fylde coast is stagnant. No evidence of a housing shortage.</p> <p>The SHMA should use the ONS population projections. The scale of development proposed is over and above that needed to meet ONS population projections. There is a conflict between Office of National Statistics (ONS) population growth rates to 2031 and Wyre’s forecast development figures which would see a 20% increase in current population during this period. The projected increase in the population of Wyre according to the ONS is from 108,000 to 114,000 i.e. 6,000 in the Plan Period -</p>	<p>The council is required by the government to objectively assess the need for future residential development through a Strategic Housing Market Assessment (SHMA.) This Objectively Assessed Need (OAN) for housing growth takes into account the needs of the local population and also future local economic growth. The OAN is not just calculated using ONS population projections - these are a starting point for further analysis, along with projections of household growth provided by the Department for Communities and Local Government (DCLG), and assumptions about economic growth, including job growth figures. It is a very simplistic calculation and not in accordance with national guidance to simply take projected population growth and divide by 2 in order to arrive at the figure of need.</p>	<p>The 2013 Fylde Coast Strategic Housing Market Assessment and Addendums 1 (2014), Addendum 2 (2016) and Addendum 3 (2017) follow a methodology which is based on government Guidance and has been tested at examination. The Objectively Assessed Housing Need (OAHN) Figure of 479 dwellings per annum was established on the basis of the evidence in Addendum 2. Addendum 3 considers the implications for the OAHN figure taking into account the latest 2014 population and household projections. Addendum 3 confirms that the OAHN figure is appropriate and justified.</p>

<p>average of 2 people per dwelling equals 3,000 additional houses.</p> <p>The Strategic Housing Market Assessment (SHMA) of 2013 has serious flaws in its logic. The SHMA needs to be critically examined and not just accepted at face value. Concerns were expressed in relation to assumed increase in the population to 125,000 by 2031 which is in excess of any projection based on the last 5 or even 10 years; the assertion that house prices have increased by 63%; need for more detail on the decline of certain population groups which if it is a national trend, little Wyre can do.</p> <p>A methodology as per the Rural Affordable Housing Needs Study should be used assessing the wishes of the existing population as a starting point to determine future needs. There is a need for the housing needs of the local population to be distinguished from the need to attract people into the borough to meet targets.</p>	<p>The 2013 Fylde Coast SHMA was prepared jointly by Wyre BC, Fylde BC and Blackpool Council and was published in February 2014 in accordance with national guidance and considers a range of demographic and economic scenarios. The 2013 SHMA has been updated to take into account new demographic and economic information. The number of houses for sale is not a source of information feeding into the SHMA. The soundness of the Local Plan will be examined by an independent Inspector at an examination in public. The Inspector will also examine the soundness of the evidence base underpinning the Local Plan. Members of the public can challenge the soundness of the SHMA during the examination.</p> <p>A joint Addendum I was produced to consider the implications of the new 2012-based population projections. An Addendum II was produced for each authority to consider the implications of the 2012 Household Projections and update the modelling accordingly. The Wyre Addendum II also updates the economic scenarios aligning the SHMA with the evidence in the 2015 Wyre Employment Land Study (ELS) Update. It is a requirement in Government Policy Guidance that the housing and economic evidence for the Local Plan is aligned. The Local Plan needs to make provision for the necessary housing to support economic growth.</p> <p>The Government requires local authorities to meet in full the OAN for housing unless there are</p>	
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	insurmountable constraints which prevent delivery of the full OAN.	
<p>EMPLOYMENT</p> <p>There is a lack of local employment to support an increased population.</p> <p>There is no economic strategy or the economic strategy is poorly defined.</p> <p>Difficult to attract jobs to the peninsula – isolated with poor accessibility.</p> <p>Hillhouse has provided a limited number of new jobs.</p> <p>Need to focus on tackling deprivation in Fleetwood.</p> <p>The economic role of agriculture has insufficient visibility. Need to mention supporting, developing and protecting agriculture.</p>	<p>The Council has adopted a Local Growth Plan to support business and enterprise growth in Wyre and is working with Blackpool Council and Fylde Borough Council on economic development. The strategic site at Hillhouse has been put forward for Enterprise Zone status which will further provide incentives for business growth. Published statistics by NOMIS show that between 2000 and 2013 there was an average 230 jobs created annually in Wyre. The Employment Land Review (ELR) recommends suitable sites to be allocated for employment purposes to support growth in the Local Plan; this includes a new strategic site on the A6 corridor and also small local sites in rural settlements. It is unrealistic to expect that Wyre will become self-contained with regards to employment.</p> <p>The concern over deprivation in Fleetwood is noted. The Local Plan will support investment in Fleetwood and complement economic development policies and strategies. Discussions are being held with the owners of Fleetwood Port about its future as a port. A number of options are being considered.</p> <p>Policies in the Local Plan will support the future of agriculture.</p>	<p>The Local Plan has been informed by the latest 2017 economic forecasts. It includes policies for new employment development and protects existing employment areas and sites. The Local Plan ensures that provision is made across all three sub-markets in the local economy.</p> <p>Investment and job-creation at Hillhouse has increased in recent years. The designation of Hillhouse as an Enterprise Zone will further assist boost investment and job creation on the site.</p> <p>The Local Plan includes specific policies to assist with the regeneration of Fleetwood Port and Fleetwood Docks and Marina.</p> <p>The Infrastructure Delivery Plan (IDP) accompanying the Local Plan recognises that capacity issues on the A585 which is the main strategic access route from the M55 to the Wyre Peninsula. The IDP indicates how Highways England (HE) will pursue improvement measures. Wyre Council has been working with HE and will continue to do so with regards to improvements on the A585.</p> <p>The Local Plan Vision and objectives recognise the economic role of agriculture /farming and its contribution to Wyre’s overall character. Green Belt and Countryside policies support agricultural development. Policy HP6 sets out the policy</p>

		parameters for new accommodation in countryside areas for rural workers including agricultural workers.
<p>HOUSING MIX There should be a good mix of housing developed and not just large detached houses preferred to by developers. Housing types should meet the needs of an older population and that of young people.</p> <p>Conflicting view with regards to the desirability of mixed housing for both young families and the elderly people together.</p> <p>Lack of recognition of caravan or park homes sites in Wyre. May reflect a need for social (“Affordable”) housing. A specially focused survey may be required.</p> <p>Affordable housing should be for people local to the settlement.</p> <p>Affordable housing must be interspersed with other housing to avoid ghettos.</p> <p>Higher densities will be required where affordability is an issue and does not have to result in a negative impact on local character.</p>	<p>Consideration will be given to include a policy in the Local Plan relating to housing mix on development sites</p> <p>The 2016 Rural Affordable Housing Needs specifically considered the role of caravan/park homes.</p> <p>Affordable housing is allocated to eligible people from within the ward the development is located as a priority. Eligible people from adjoining wards will be considered if the properties are not taken up and then a wider area.</p> <p>Affordable housing is usually an element on proposed development with majority being market housing. There are however instances where a Registered Provider will propose a scheme which will be solely for affordable housing. These tend to be smaller developments and in the context of the wider settlement do not represent ghettos.</p> <p>Comment Noted</p>	<p>The Local Plan includes policy HP2 requiring an appropriate mix of housing in terms of size and type. The policy also requires a proportion to be suitable or adaptable for older persons.</p> <p>The Local Plan includes a policy for the provision of Affordable Housing (Policy HP3).</p>
<p>COMMUTING Development will increase commuting.</p>	<p>The Local Plan does not seek to change commuting patterns. There are many factors that influence</p>	<p>The Local Plan makes adequate provision to meet requirements for employment development in all</p>

<p>The council underestimate the growth of commuting and its effect on the transport networks. Some settlements will become a dormitory town.</p>	<p>where people live and work and it is expected that some current and future residents will work outside of the borough. People do not always choose to live close to their place of work. This is in itself a normal situation. The Council’s economic growth plans supported by economic policies in the Local Plan may assist in containing the level of commuting by car to employment locations outside of the Borough. The council is working to promote economic development to ensure that residents have the opportunity to access local jobs. Annually between 2000 and 2013 there have been 230 jobs created in the Borough on average. The Local Plan will identify a number of employment sites to support this aim. With regards to the impact on the local highway network, this matter is considered as part of the evidence for the Local Plan</p>	<p>three sub-market areas in Wyre. Large extensions to rural settlements incorporate land for employment uses.</p>
<p>URBANISATION Wyre council policies have led to the urbanisation of the peninsula. Proposals will increase urbanisation along the A6 corridor and in rural villages. The amount of housing should be proportionate to the size of the settlement.</p>	<p>Comments noted and the concerns are appreciated. Places change and grow over time to accommodate the needs of a growing population. This is inevitable. In the past needs were assessed and distributed on a regional basis. This meant that Wyre council had to identify less land for development than demographic or economic data suggested. Now each local authority must identify and meet in full its development needs for a 15 year period. Evidence shows that the scale of development needed represents a considerable increase than what was required in the past. The Local Plan will include</p>	<p>The Local Plan is required to meet in full its objectively assessed needs. The Local Plan accommodates development where possible within the constraints imposed by the highway network but ensures that development is supported by necessary infrastructure. Inevitably the local Plan proposes development across the borough including substantial growth in some rural settlements. The amount of new housing cannot be dictated by the current size of the settlement.</p>

	<p>policies to ensure that development is of high quality and is sensitive to local character and amenity.</p>	
<p>GREEN BELT Concerned about development on the Green Belt (in some cases this comment relates to greenfield land that is not designated Green Belt.)</p> <p>Green Belt policy should include as a purpose of the purpose of Green Belt the opportunity to use the land for recreational use e.g. countryside walking and cycling. It should include in its aims that Green Belt areas often give residents the opportunity to enjoy open spaces.</p> <p>Areas around rural and semi-rural settlements should be designated as Green Belt to prevent the coalescence of villages and towns – for instance along the A6 corridor and including places such as Churchtown, Garstang, Catterall, Winmarleigh and Nateby,</p> <p>There should be a review of the Green Belt as part of assessing development needs and how these can be met.</p>	<p>‘Green Belt’ does not refer to any undeveloped greenfield land. Indeed Green Belt often includes small developed areas. It is a specific policy which in the case of Wyre only applies on the peninsula separating Fleetwood, Cleveleys, Thornton and Poulton-le-Fylde from each other and from Blackpool and Staining.</p> <p>The Green belt is a national policy and therefore the purposes for designating Green Belt and the restrictions to development within are set nationally and set out in the National Planning Policy Framework NPPF. These purposes cannot be changed through the local plan process.</p> <p>The areas designated as Green Belt can only be altered through the local plan process and any alterations (both deletions and additions) will need to demonstrate exceptional circumstances. In designating new areas of Green Belt, it will be necessary to demonstrate among other things the necessity for the Green Belt and why normal planning and development management policies would not be adequate. This will be considered as part of the preparation of the Local Plan.</p> <p>Wyre Council has undertaken a local review of the Green Belt in Wyre which entailed an assessment of the Green Belt and whether any part could be released without affecting the function and integrity</p>	<p>The Local Plan through policy SP1 proposes ‘Strategic Areas of Separation’ to prevent the coalescence of villages. This aims to protect the identity and distinctiveness of the settlements concerned.</p>

	of the Green Belt with reference to the purposes set in national policy. The Study will be published alongside the Local Plan.	
<p>CHARACTER There will be a negative impact of development on the character/heritage of a place including listed buildings and conservation areas. Development should be small scale and be sympathetic to preserve the local village character.</p>	<p>The council recognise the importance of protecting and enhancing the borough’s built and rural character and heritage. The Local Plan will include design policies which require development to be of high quality and sympathetic to the character of the surrounding area. It will also include policies protecting heritage and amenities. However the local plan is also required to identify land to meet development needs. This inevitably the local plan will require development in or adjacent to existing settlements.</p>	<p>The Local Plan includes policies to ensure high quality design in new development which respects existing character (Policy CDMP3 – Design). Policy CDMP5 – Historic Environment aims to protect and where appropriate enhance the historic environment.</p>
<p>SCALE OF DEVELOPMENT The scale of development proposed is disproportionate to the scale of the existing community/settlement.</p>	<p>The concern is noted. The council has an obligation in national policy to meet its development needs and promote sustainable development. The Local Plan will include policies to ensure that development is of high design quality and sensitive to its surroundings, including the character of the local area.</p>	<p>The Local Plan had to meet development needs where possible within identified constraints. There would be a risk of the Local Plan being found unsound if opportunities to meet development needs were not maximised. The Local Plan only meets 86% of housing needs.</p>
<p>LANDSCAPE IMPACT Development will have a negative landscape impact, including loss of views</p>	<p>The borough’s natural landscape, including long distance views, form an important part of the borough’s character. Design Policies in the local plan will ensure that development take into account landscape consideration and the character of the local area.</p>	<p>Policy CDMP4 – Environmental Assets includes provisions to protect landscape character. Policy CDMP3 – Design requires that consideration be given to views into and out of the development. Other policies also include landscape considerations such as Policies HP4 – Residential Curtilages, EP9 – Holiday Accommodation, EP13 - Telecommunications. Where appropriate specific allocations also require that development be supported by a landscape and Green Infrastructure Framework.</p>

<p>DEVELOPMENT – TOURISM IMPACT Development will have a negative impact on tourism and the recreational use of an area, including the AONB and its vicinity, by changing its character, including loss of countryside and impact on the use of lanes and paths.</p>	<p>The council recognise that tourism is an important component of the local economy and that the borough’s natural assets are an important source of recreation and leisure for local residents and visitors. However the council has an obligation in national policy to meet its development needs and promote sustainable development. The Local Plan will include policies to ensure that development is of high design quality and sensitive to its surroundings, including the character of the local area.</p>	<p>Development does not have a negative impact on tourism. The Local Plan includes policies which protect the AONB (Policy SP5), the countryside (Policy SP4) and Environmental Assets (Policy CDMP4).</p>
<p>Development will have a negative impact on green infrastructure such as loss of recreational areas and open space or on the amenity of such. The Local Plan should highlight those areas which are currently popular for recreation within the communities e.g. walking and cycling in countryside lanes.</p>	<p>The Council recognises that a Green Infrastructure Network is important to the sustainability of a place and the Local Plan will include policies protecting essential Green Infrastructure. However it is inevitable that some currently undeveloped areas will need to be developed in order to meet the development needs for the period up to 2031.</p>	<p>Development does not have a negative impact on Green Infrastructure. The Local Plan includes policies which protect Green Infrastructure (Policy CDMP4 - Environmental Assets). The Local Plan also includes policy HP9 requiring the provision of green infrastructure on residential development.</p>
<p>LOSS OF GREENFIELDS/COUNTRYSIDE/PRODUCTIVE AGRICULTURAL LAND. Development will involve the loss of greenfields/countryside and loss of productive agricultural land. The plan should prioritise the development of brownfield land before greenfield land.</p>	<p>The Local Plan will need to identify deliverable land for development. Where possible and appropriate the Local Plan will identify land for development starting with previously developed land, (pdl) before considering greenfield land. However, Wyre has a very limited supply of previously developed land, especially previously developed land suitable for residential development. This means that the majority of current and future development needs will have to be met on greenfield sites, many of which will lie on the edge of existing settlements and may involve land currently used for agricultural purposes. Priority will be given to developing areas of</p>	<p>The Local Plan seeks to maximise the development potential of previously developed land where possible, although as noted this is in limited supply. The Plan aims to develop the least productive agricultural land but in order to meet development needs, this hasn’t always been possible. The Plan contains policy SP4 which protects the countryside from inappropriate development outside of settlement boundaries.</p>

	poorer quality agricultural land in preference to that of higher quality.	
<p>LOSS OF HABITATS Development will lead to the loss of habitats and therefore will have a negative impact on wildlife and biodiversity.</p>	In preparing the Local Plan, the Council will take into account wildlife and habitat interests and seek to minimise impact on biodiversity. The Local Plan will include policies that will require a consideration of wildlife and habitat impacts and means of mitigating such impacts. Further, the Local Plan will contain policies to protect and preserve designated areas of natural/environmental importance as part of the green infrastructure.	The Local Plan is supported by a Sustainability Appraisal. Policy CDMP4 – Environmental Assets includes provisions for the protection of ecological assets. The Plan includes site allocation policies many of which, by virtue of their greenfield nature, refer to the need to have regard to ecological issues and the need to mitigate loss of habitat.
<p>QUALITY OF LIFE/HEALTH The amount of development proposed in an area will have a negative impact on quality of life and health and well-being.</p>	Development does not necessarily have a negative impact on quality of life, health and well-being. The provision of jobs and houses contribute to the quality of life and well-being of the community. The Local Plan will further include policies on the provision of open space, the protection of essential Green Infrastructure and high quality design. The Local Plan will also be subject to a Health Impact Assessment.	<p>A bespoke Health Impact Assessment was not carried out. However the Sustainability Appraisal (SA) considers health. Objective 3 relates to physical and mental health and wellbeing and reducing health inequalities. It is considered that the SA adequately considers health impact.</p> <p>The Local Plan includes policies which protect amenities including CDMP1 – Environmental Protection, CDMP3 – Design and CDMP4 – Environmental Assets. Policy SP8 deals specifically with Health and Wellbeing.</p>
<p>FLOOD RISK Concerned about development taking place in areas of flood risk. Can be a risk for the new occupiers/difficult to obtain insurance. Impact of rising sea level and the tidal reach of the Wyre moving further inland. Flood risk will increase as a result of new</p>	Flood risk is a significant constraint to development in certain parts of the borough. As part of the evidence base, the council is preparing a level 2 Strategic Flood Risk Assessment (SFRA) which will provide a more detailed assessment of the flood risk associated with specific sites/areas from all sources (fluvial, coastal, surface water, reservoir) and recommend mitigation required. The study will also	The Local Plan has been informed by a Level 2 Strategic Flood Risk Assessment (SFRA). The Local Plan includes policy CDMP2 - Flood Risk and Surface Water Management to ensure that flood risk is given proper consideration in determining planning applications. The Infrastructure Delivery Plan (IDP) includes a drainage strategy in relation to surface

<p>development, for instance by increasing run-off.</p>	<p>consider the potential displacement of flooding. National policy does not preclude development in flood risk areas subject to the sequential and exceptions tests. If development is proposed in areas at risk of flooding appropriate mitigation will be required.</p>	<p>water which has informed allocations in the Local Plan.</p>
<p>DRAINAGE Development is proposed in areas currently suffering from drainage/sewerage/water supply issues, including lack of capacity and therefore is inappropriate.</p>	<p>The Council is working with United Utilities considering the current supply of, and future need for, water infrastructure as part of the Infrastructure Delivery Plan which will be published alongside the Local Plan. The Local Plan will contain policies to address drainage and flood risk matters when developments come forward, including the use of sustainable drainage techniques.</p>	<p>Policy CDMP2 - Flood Risk and Surface Water Management deals with flood risk and drainage matters. United Utilities were involved in the preparation of the Local Plan and the infrastructure Delivery Plan (IDP).</p>
<p>ENERGY A barrage should be built across the River Wyre at Fleetwood. Fracking is not properly addressed in the Issues and Options document. Concern about the health and safety aspects of the gas storage permission north of Stalmine and potential implications for site allocations on the northern edge of Stalmine. The plan needs to recognise the potential for minerals and energy development with related activities and linked industries.</p>	<p>There are two groups interested in harnessing tidal energy on the river Wyre. The Council is exploring the feasibility of such development with partners in the UK and abroad under the European Interreg programme. The Local Plan will be supportive of tidal energy generation. The Council will consult with the Health and Safety Executive (HSE) with regards to the implications of the gas storage permission at Stalmine for the Local Plan and in particular whether there are any exclusion zones preventing development. Fracking and other mineral development are matters for the Minerals and Waste (M&W) Local Plan prepared by the County Council jointly with Blackpool Council and Blackburn with Darwen Council and forms part of the statutory Development Plan for Wyre. The Wyre Local Plan will not have</p>	<p>Policy EP12 – Renewable Energy would in principle support a barrage across the river Wyre should a proposal come forward. At present there is no detailed scheme for a barrage.</p>

	<p>policies on fracking other mineral development. The M&W Local Plan is currently under review.</p> <p>The Local Plan will include policies relating to energy developments.</p>	
<p>SPATIAL DIVERSITY The borough is a diverse area with differing issues. The plan, vision and objectives need to reflect this.</p> <p>What is appropriate for the peninsula is not appropriate for a rural village.</p> <p>Area by area analysis to understand the complexities of the ‘present position’.</p>	<p>The Council accepts the diverse nature of the Borough. In reviewing the spatial portrait, vision and objectives the Council will ensure they adequately reflect these matters.</p> <p>The Local Plan will include policies to ensure that new development respect individual character. The Council has the understanding for individual areas from previous work carried out in relation to a draft Core Strategy. At the time the Council’s approach was one involving a series of individual strategies for different areas. In preparing a single Local Plan and in view of the greater scale of development that it is necessary to accommodate following the completion of the Strategic Housing Market Assessment, it is more appropriate that the Plan looks at the entire Borough as a whole.</p>	<p>The Vision, Objectives and policies in the Local Plan cover the range of issues across the Borough. Policies are sufficiently broad to apply across the Borough. It is a matter of interpretation of the policy to the specific characteristics of a locality.</p>
<p>ADJACENT AREAS The plan needs to reflect an awareness of planning in adjacent areas, including proposals and approaches to settlements that lie across administrative boundaries.</p>	<p>The council is subject to a Duty to Co-operate with adjacent local authorities. This involves understanding cross-boundary issues and having an awareness of planning proposals that have implications for settlements that lies across local authority administrative boundaries.</p> <p>However adopted policies in adjoining local authorities do not apply in Wyre and the Council in preparing the Wyre Local Plan need to come to its own decision on what is appropriate within Wyre, albeit having regards to policies across the boundary.</p>	<p>The Local Plan is consistent with policies in adjoining Local Authorities with regards to settlements that straddle local authority boundaries.</p>

<p>CURRENT HOUSING STOCK The council should re-use empty properties instead of developing green field sites. Should be a greater focus on the need to improve the current housing stock in parts of Fleetwood, Thornton and Cleveleys as opposed to developing green field sites. The plan should welcome and support proposals for the sub-division and conversion of existing buildings and support smaller infill sites rather than large scale extensions to settlements.</p>	<p>A (normally around 3%) level of empty properties is necessary for the operation of the housing market. In 2014 ONS figures showed that there were 1,619 empty properties in Wyre which represent 3.2%. With regards to as long-term vacant (longer than six months), there were only 315 were recorded which represent 0.6%. Consideration will be given whether there is evidence to support an allowance for the contribution to the supply of housing from long term empty properties coming back into use.</p> <p>The improvement of the current housing stock is supported but it is not a matter for the Local Plan. The Local Plan will not have any negative implications for improvements to the existing housing stock. Where appropriate the Local Plan will support the subdivision and conversion of existing buildings. The creation of new dwellings from subdivisions and conversions is taken into account in the housing land supply calculations. Small infill sites will also be considered as part of the housing land supply before green field sites. However, it is inevitable that greenfield extensions will be needed in order to meet in full the Borough Housing Objectively Assessed Needs (OAN) as required by national policy.</p>	<p>No further response.</p>
<p>LOW CARBON Development will lead to an increase in pollution and Co2 emissions and will reduce air quality. Insufficient consideration given to the effects of the proposed development on climate change. Climate change is</p>	<p>The Local Plan will include policies in relation to environmental protection which will cover pollution. The Local Plan preparation will take into account designated Air Quality Management areas.</p>	<p>The Local Plan includes policy CDMP1 – Environmental Protection which deals with pollution.</p> <p>The effects of climate change were considered in the level 2 Strategic Flood Risk Assessment (SFRA) and the Sustainability Appraisal (SA).</p>

<p>addressed only in terms of the risk to infrastructure. Future development ought to be carbon-zero.</p>	<p>The Local Plan will be subject to a Sustainability Appraisal which includes consideration of climate change matters. The Government has moved away from carbon-zero developments.</p>	
<p>STRATEGIC OBJECTIVES The Strategic Objectives need to include targets so they can be monitored.</p>	<p>The new Local Plan will include a monitoring framework. The monitoring framework will include a set of indicators and targets which will measure the Strategic Objectives. The indicators will be monitored annually in the Authorities Monitoring Report (AMR).</p>	<p>The Local Plan includes a monitoring framework for the monitoring of performance against the strategic Objectives and policies in the Local Plan.</p>
<p>SITE CONSTRAINTS A number of comments were made on specific sites relating to perceived constraints</p>	<p>Comments on individual sites will be taken into account in finalising the SHLAA and where necessary address issues raised. A number of constraints identified such as flooding, highway or sewage system capacity are being considered as part of the evidence based and /or the Infrastructure Delivery Plan process. Constraints as far as they affect the deliverability of a site will be taken into account in deciding allocations.</p>	<p>No further response.</p>
<p>NEW TOWN Rather than expanding existing settlements or developing in the peninsula a new town should be constructed (as distinct from comments relating to the expansion of Winmarleigh for instance) in the centre of Wyre where there is the space or close to the A6 to take advantage of the connectivity to Preston.</p>	<p>The Issues and Option Report indicate substantial expansion at Winmarleigh and at Nateby. These are not however ‘new towns’. The centre of Wyre (east of the river Wyre and west of the A6) comprises open countryside and scattered by small rural communities. It is primarily is grades 2 and 3 agricultural land with numerous working farms. The area and also includes areas of ecological significance. The development of a new town to accommodate all of Wyre’s development needs would be a disproportionate impact on these communities and farming. Such an option will</p>	<p>Developing a new town in the centre of Wyre is not a reasonable alternative option for meeting development needs in the period to 2031. The land is in multiple ownership in active farming. There is no existing infrastructure include water, drainage and roads. It is not a deliverable option.</p>

	<p>significantly change the rural character of Wyre and would be unacceptable.</p> <p>It is not considered a realistic option deliverable within the plan period. The land will be in multiple ownerships with limited capacity in existing infrastructure in place in terms of roads, waste water disposal, clean water supply, schools, health facilities and shops.</p>	
<p>CONSULTATION Consultation was not clearly communicated</p>	<p>Wyre Council publicised the consultation in the following ways; sending approximately 11,000 emails/letters , notices in all papers; newspaper press releases and articles; notice on the council website, Facebook and Twitter, posters distributed around the borough including libraries, parish/town council and pre-consultation briefing to all Ward members and planning ambassadors of Parish and Town Councils</p> <p>Documents were deposited at libraries, Garstang TIC and the Civic Centre at Poulton-le-Fylde.</p> <p>It is considered that the consultation was widely publicised and the number of responses received indicates that it was successful.</p>	<p>No further response.</p>
<p>NATIONAL PLANNING POLICY FRAMEWORK The scale of development, the development of individual sites and the implications for individual settlements is not consistent with the NPPF and conflicts with the Issues and Options vision and objectives (e.g. 8. Accessibility, 9. Infrastructure. 10. Environmental footprint. 11. Adapt to climate change.)</p>	<p>The Issues and Options set out the long list of sites around individual settlements from which allocations to meet development needs would be made. The Issues and Options Document did not include any proposals.</p> <p>The Local Plan will be NPPF compliant as required regulations. It is important that the vision and objectives are read as a whole. There is a need for a</p>	<p>The Local Plan is consistent with the NPPF. The NPPF requires Local Plans to meet in full their objectively assessed needs.</p>

	balanced consideration in preparing the Local Plan against the vision and objectives.	
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