

**Submission Draft Wyre Local Plan January 2018**

**Statement of Consultation**

**Appendix 15**

**Objectively Assessed Housing Need (OAHN) and Housing Supply – Summary of Main Matters and Wyre Council’s Response (pages 1-6)**

**Appendix 16**

**Publication Draft Wyre Local Plan 2017 – Housing Allocation SA1/13 – Inskip Extension, Inskip – Summary of Main Matters and Wyre Council Response (pages 7-22)**

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**Appendix 15**

**Objectively Assessed Housing Need (OAHN) and Housing Supply – Summary of Main Matters and Wyre Council’s Response**

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| 1.   | <p><b>OAN/Population Growth</b></p> <p>The plan OAN should be based on latest government figures of 313 not 479pa. The allocation is not based on locally assessed need. Office for National Statistics report the population in this area is projected to increase at the lowest rate of all English regions, only 9% between 2008 and 2033. One of only one of two regions where the working age population is projected to decrease, population to increase by 8,000 and around 2 persons per dwelling average occupancy – need 4,000 maximum.</p> | <p>The government’s document “Planning for the right homes in the right places” is a consultation document on identifying local housing need. The methodology and the actual figure may change before the document is finalised and published. The transitional arrangements within the document itself advise that Local Plans which will be submitted before 31 March 2018 should continue on the basis of the current figures. As such the Council is unable to give any weight to the draft document as a basis for the Local Plan.</p> <p>The OAN figure is based on a robust methodology which itself follows current Government guidance. This is set out in the Strategic Housing Market Assessment and Addendums 1, 2, and 3. Need is assessed on a Borough wide basis not for individual settlements. The methodology suggested for calculating need is not in line with Government Guidance.</p> |
| 2.   | <p><b>Sedgefield not Liverpool</b></p> <p>Spreading backlog does not positively address housing issues; NPPF provides clear steer to address backlog in first five years, not demonstrated adequately why using Liverpool not Sedgefield approach for the Local Plan. Local Plan does not aim to meet any undersupply in first five years. Not clear how the backlog is addressed through the Local Plan. Suggested that Sedgefield and not Liverpool approach is used for the five year housing supply.</p>  | <p>The council’s Housing Background Paper sets out how the Local Plan housing requirement has been established and how the shortfall accrued (‘backlog’) since 2011 is addressed using the ‘Liverpool’ approach. The paper also explains why the council considers the Liverpool method to be the most appropriate way in which to address the current shortfall accrued since the start of the Local Plan period 2011. The use of the Liverpool method allows for a realistic housing land supply which minimises the risk of the Local Plan being deemed out of date shortly after it is adopted. The Local Plan has allocated the</p>  |

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|      |  | <p>maximum land possible subject to constraints which is sufficient to meet a requirement of 411 dwellings per-annum. The Local Plan does not constrain the housebuilding industry to deliver more than 411 dwellings and effectively deliver more of the backlog in the first five years. The use of the ‘Sedgefield’ approach will mean that the housing land supply is just 5 years which provides no margin of flexibility if there are any delays in completions.</p> <p>Representations do not indicate why the council’s justification is inadequate.</p>  |
| 3.   | <p><b>Apply 20% buffer on top of requirement in the Local Plan</b><br/>Apply a 20% buffer to the Local Plan housing requirement to provide sufficient development opportunities.</p> | <p>The provision of a 20% buffer to bring forward sites from later in the Plan period applies to the calculation of the five year housing supply where the council has persistently under delivered. There is no requirement to apply such a buffer to the Local Plan.</p>  |
| 4.   | <p><b>Five year housing supply</b><br/>WBC has a persist record of under-delivery and should apply a 20% buffer to the five year housing supply.</p>                                 | <p>The council’s Housing Background Paper sets out the five year land position and requirement and demonstrates that the council does not persistently have under delivered housing and it is therefore appropriate to adopt a 5% buffer to the base requirement and shortfall.</p>   |
| 5.   | <p><b>OAN should be 513 not 479</b><br/>Based on SHMA the OAN should be 513 to support forecast job growth.</p>  | <p>Based on a set of reasonable labour-force adjustments the Addendum 3 analysis considers that forecast job growth can be supported through the provision of 415 dwellings per annum. The analysis recognises a high degree of uncertainty with regards to labour-force behaviours with the sensitivities suggesting that up to 513 dwellings may be needed. However, this is reliant upon notably conservative assumptions around labour-force behaviour in so much that they assume very limited increases in the levels of economic activity of older age groups, below those projected nationally by the OBR (i.e. as used in the core scenario). The sensitivity scenario suggests a notably different population profile</p> |

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|      |  | <p>and a level of projected growth which exceeds historic demographic trends by some distance. The justification for such pronounced growth in population driven by growth in the working-age populations is not considered to be apparent when considering the comparatively modest scale of job growth forecast (Paragraph 7.15). As stated at paragraph 7.16 allowing for some degree of flexibility is considered appropriate with the OAN figure being at the upper end of the identified range.</p>   |
| 6.   | <p><b>Not meeting full OAN</b><br/>                     More evidence required to demonstrate why need cannot be met, not explored all options, IDP should address infrastructure constraints to ensure that development is maximised, not explored implications of failing to meet OAN especially in relation to the supply of working population and delivery of affordable housing; housing delivery is improving and this will continue so can meet full OAN, not demonstrated that delivering the full OAN would lead to adverse impacts.</p> | <p>The council’s Housing Background Paper explains why the council is unable to meet its full OAN with reference to the constraints. The Paper also explains the options the council has explored to maximise delivery such as a new junction on the M6 motorway near Garstang.</p> <p>Addendum 3 analysis considers that forecast job growth can be supported through the provision of 415 dwellings per annum which is only just over the established housing requirement in the Local Plan.</p> <p>The Local Plan is seeking to maximise the delivery of affordable housing subject to viability considerations.</p> <p>Meeting the OAN in full is not a matter of ‘delivery’ but lack of deliverable land due to constraints.</p> |
| 7.   | <p><b>Duty to Cooperate</b><br/>                     Further justification required for how shortfall can be met with neighbouring authorities.</p>  | <p>Wyre objected to the ‘Publication’ draft Fylde Local Plan that it should have included contingencies with regards to the shortfall in Wyre. So far the Fylde Local Plan Inspector has ruled that Fylde has met the duty to co-operate. There has not been any further discussion regarding the shortfall in Wyre as part of the Fylde Local plan examination. This is a matter for the Fylde Local Plan Inspector if she considers that to do so is relevant and appropriate.</p>  |

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|      |   | <p>The level of shortfall and the reasons for the shortfall need to be confirmed through the Wyre Local Plan examination. The Council will continue to work with adjoining local authorities as they prepare/review their respective local plans through the duty to cooperate.</p>   |
| 8.   | <p><b>Windfall Allowance</b><br/>                     No windfall allowance. A windfall allowance could assist in encouraging suitable sites to come forward and help deliver a greater amount of residential development over the plan period.</p>   | <p>The council’s Housing Background Paper explains why the council considers it to be inappropriate to include a windfall allowance.</p> <p>The inclusion of a windfall allowance will not influence whether such sites will come forward or not. Although there is evidence that small windfall sites have come forward in the past there is doubt whether such sites will continue to be a reliable source of supply in the future in view of constraints.</p>  |
| 9.   | <p><b>Buildout Rates</b><br/>                     The Housing Background paper sets out the Build out rate assumptions. Table 10 sets out standard lead in and build out rates for sites, however the overall approach to build out rates is unclear.</p> <p>Build out rates for all sites where development is not predicted to be completed during the plan period (SA1/2, SA1/11, SA3/3 and SA3/4) are significantly lower in the trajectory. No explanation/justification for this in the site information in the Local Plan or Housing Background paper.</p> <p>Local Plan does not apply a restrictive phasing policy to release any of the allocated housing sites. If standard build out rates were applied, an additional 348 dwellings over the Plan period could be delivered which could have a substantial impact on level of unmet need and impact on neighbouring authorities.</p> | <p>The assumptions in Table 10 of the Housing Background Paper are the starting point in considering built out rates. The Council has also consulted with developers/housebuilders who are active in the Borough and has applied planning judgement as to how a site is realistically expected to be delivered. It is accepted that the September 2017 Housing Background Paper is not clear; this has been remedied in the December 2017 update.</p> <p>The December 2017 update of the Housing Background Paper includes an explanation for the build out rates for the sites which are not expected to be completed during the plan period (SA1/2, SA1/11, SA3/3 and SA3/4). The lower built out rates take account of developer/housebuilder advice and also adopt a cautious approach in areas where the market remains untested. Using over ambitious built out rates risks the Local Plan becoming out of date if developers/housebuilders do not deliver accordingly.</p> |

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|                   | <p>No justification provided for deviating from standard build out rate assumptions.</p>  |  |
| <p><b>10.</b></p> | <p><b>Affordable Housing</b><br/>                     OAN should be increased/ OAN should be 513pa to maximise the delivery of affordable housing. Further uplift to OAN required to boost delivery of affordable housing towards its full delivery.</p> <p>The need for affordable housing should be considered in the context of its likely delivery. Provision at the higher end of the OAN range will not result in more affordable delivery in Wyre, because insufficient housing land has been identified in the Borough. Therefore, the affordable need does not add to the overall need for housing in Wyre and does not provide any justification for an OAN uplift.</p> <p>Affordable housing targets are unrealistic. Blanket 30% in certain locations too high which is not evidenced or justified and could render sites unviable.</p> <p>The Local Plan stresses needs for affordable housing and smaller homes for both young and old. Without taking into account any shortfall, 33% of all new housing needs to be affordable 2017-2022 and 46% over the rest of the plan period. Given that only 30% of new housing developments (&gt;10) need to be affordable, these targets are unrealistic.</p> | <p>The OAN figure of 479 is set at the upper end of the OAN range and incorporates sufficient uplift to account for affordability and the need for affordable housing.</p> <p>The SHMA methodology requires that consideration be given to the relationship between affordable housing need and the overall OAN. In Wyre, as is the case in Fylde, there is a recognised significant need for affordable housing. Whilst a separate ‘quantified uplift’ is not prescribed this is considered to support a level of flexibility in the OAN and reinforce the importance of uplifting from a level of need based purely on trend-based household projections.</p> <p>The level of affordable housing required in the Local Plan has been informed by the Local Plan viability assessment which shows that the 30% requirement is viable. It is noted that it is not a blanket requirement. The viability assessment has considered viability in different part of the Borough and also with reference to brownfield and greenfield land.</p> <p>The affordable housing requirement in the policy has to be informed by the viability information. The targets are therefore realistic.</p> |

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|------|--|--|
| 1.   | <p><b>Confidentiality/Gagging</b><br/>                     Wyre council has subject the Parish Council to a confidentiality agreement – referred to as “gagging” in some responses – such that information about the local plan and its impact on Inskip could not be discussed with the local community (note that these comments have been made variously in response to the formal questions regarding legal compliance, Duty to Cooperate and soundness. The council has also received a number of general comments where this point has been raised).</p> | <p>The council's approach to consultation has been set out in its Statement of Consultation (SoC) September 2017 and will be updated as a result of the consultation on the Publication Draft Wyre Local Plan 2017. The SoC makes clear the importance of engagement with Parish and Town council's as representatives of their respective local communities, throughout the process of developing the local plan. It is also acknowledged that these conversations have necessarily been on a confidential basis as they were reflective of work in progress particularly as key aspects of the local plan evidence base relating to flood risk and, in particular, highway capacity, took some time to bring to a clear conclusion. Both of these pieces of work have had a significant impact of the total amount of residential development that the council can accommodate and where that development should take place. The evidence on highway capacity was published in February 2017 and provides a clear indication of the scale of development that could take place across Inskip and St. Michaels. All parish councils were urged to monitor the evidence base as it developed to allow time to digest possible implications. Contrary to many comments made, there was and is no formal confidentially agreement with any of the Parish or Town councils. Nor could (or would) the council remove any Parish or Town council from the formal consultation process as has also been alleged.</p> |
| 2.   | <p><b>Consultation with the Local Community</b><br/>                     The council has developed the plans for the village “out of sight” of the local community</p>   | <p>In June 2015 the Council published for public consultation an Issues and Options document that indicated the potential for substantial development at Inskip. This included the land subsequently proposed for allocation (SA1/13). The SoC notes that the council operates a system of Parish/Town</p>   |

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|      |              | <p>council Planning Ambassadors and a briefing for said Ambassadors was held on 11 June 2015. The Ambassador for Inskip attended and was hence briefed on the background to, and content of, the Issues and Options document and the consultation process. Inskip with Sowerby Parish Council subsequently made a formal representation on the content of the Issues and Options document as it pertained to the village of Inskip. Wyre council also received comments from local residents. It is noted that it is clear from Parish Council minutes that the Issues and Options document was publicised by the Parish Council with items appearing in local newsletters. It is clear, therefore, that the potential for substantial change at Inskip has been in the public domain since the middle of 2015. It is also clear from Parish Council records that:</p> <ul style="list-style-type: none"> <li>• The local plan has been an agenda item on a number of occasions since 2015.</li> <li>• The fact of the potential for land to the north of Preston Road to become a residential allocation was made public via the minutes of the Parish Council meeting of 22<sup>nd</sup> June 2017.</li> <li>• The fact that discussions were taking place between the parish council and Wyre council was in the public domain (see for example minutes of the Parish Council meeting of 16<sup>th</sup> March 2017).</li> <li>• The Parish Council Newsletter 12 of March 2017 highlights the likelihood of “hundreds” of new homes being built in Inskip through the local plan and states “.....now is the time for members of the public who wish to object to any aspect of the plan to get organised, ahead of the public consultation period.”</li> <li>• The Parish Council Newsletter 13 of 30 August 2017 is solely concerned with the local plan proposals which are explained and critiqued in some detail.</li> </ul> |



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|      |   | <p>It would be incorrect therefore to say that the opportunity to influence the approach to development at Inskip has not existed or that proposals for Inskip have been developed out of sight of the general public or local representatives. As is normal within the local plan process, the wider community have not been involved in discussions about the final allocation, but the Parish Council - as community representatives – has. At these meetings the Parish put forward a clear and strong views.</p>   |
| 3.   | <p><b>Views of the Parish</b><br/>The views of the Parish council have been ignored.</p>                      | <p>The Parish Council has been involved in detailed discussion with officers regarding the scale of development in Inskip and allocations. This included their view of where development should take place within the village. The reasons behind the fact that the council is not able to allocate their preferred land has been clearly explained to the Parish. It is not correct to say that the views of the Parish have been ignored. Indeed the record shows a number of meetings between the parish council and Wyre council, some involving the Chief Executive. Indeed, although the council has been unable to allocate the preferred land, it has allocated land – in a location specifically requested by the Parish – for a village green – a key component of the parish council’s preferred approach.</p> |
| 4.   | <p><b>Consultation/Landowner</b><br/>The landowner has influenced the approach to consultation in Inskip.</p> | <p>The request for confidentiality as discussed above has not been made at the requirement of any developer or landowner.</p>   |
| 5.   | <p><b>Local opinion</b><br/>No local support – in a survey 74% against further development.</p>               | <p>Opposition to further development per-se is not a soundness issue. The council appreciates that there has been a significant negative reaction to the Publication Draft Local Plan and the allocation of land for 255 dwellings at Inskip. A wide range of matters have been raised in objection to the proposal. These are set out below together with the council’s response. Fundamentally, however, the council is required to consider the housing needs of the whole borough within the context of any constraints that may impact on the ability of the council to allocate land to meet these needs. Whilst this may not be popular with many communities, the delivery of new</p>   |

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|                  |  | <p>housing is a fundamental necessity and a key objective of this, and previous, national government. As set out in the Plan, the council is keen to ensure that where development does take place, it is responsive to the local circumstance, including, where possible, the delivery of additional services and facilities.</p>   |
| <p><b>6.</b></p> | <p><b>Inappropriate scale</b><br/>                     The proposed allocation is substantially out of scale/disproportionate – more than doubling its size - compared to the existing settlement. Lopsided growth/unbalanced settlement profile. Due to the scale proposed the development cannot be an “organic” extension to the village. Inconsistent with the Issues and Options document which stated at Para. 6.27 that “the release of site on the edge of all rural settlements would need to be carefully considered to ensure that the expansion of these settlements is not disproportionate and does not have an unacceptable impact on the character of rural areas”. The proposed expansion of Inskip fails these criteria.</p> | <p>It is accepted that the allocation at Inskip represents a large extension to the village, more than doubling its size. However, in itself this is not a justification for non-allocation and there is nothing in national planning guidance that would support non-allocation on the simple matter of relative scale. The Issues and Options document at para. 6.77 describes the implications of a dispersed approach to the spatial strategy whereby rural settlements would accommodate a greater proportion of growth. As a whole, the Issues and Options document sets out matters under consideration at that point in the process. It does not bind the Local Plan to a particular course of action. The Local Plan has to be evidence based and in a situation where there are significant constraints on development across the Borough, it is the council’s view that a policy of proportionate growth specific to a particular village would not be defensible where the council is unable to meet its objectively assessed need for housing. . However the sensitivity of edge of settlement locations is understood and it is the express intention of the Local Plan is that matters such as design, layout and boundary treatments are such that new development will take the form of an “organic” extension to the village as opposed to a “bolted-on” housing estate. The location of allocation is addressed under “site selection” below.</p> |
| <p><b>7.</b></p> | <p><b>Loss of rural character</b><br/>                     The allocation does not take account of the different roles and character of different areas and recognise the intrinsic character and beauty of the countryside and support thriving rural communities within it (NPPF (P5:8)). Will lead to a loss of Inskip’s rural character and identity – would become an urban sprawl and mid-sized settlement.</p>  | <p>The Local Plan does take account of the different roles and character of different areas and there are policies in the Local Plan that seek to protect that. There is also a policy that seeks to protect the intrinsic character of the countryside. The Local Plan must also respond to the need to accommodate development in the Borough. It is not accepted that Inskip will cease to be a rural settlement, nor is it accepted that the allocation will</p>   |

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|                  | <p>The ‘villagescape’ would be significantly and irreversibly changed. Loss of views.</p>   | <p>constitute “urban-sprawl”. Individual settlements grow and change over time and Inskip as it is now will physically change. It is accepted that some views will be affected, from certain viewpoints as is the case wherever development may be sited. The loss of a personal view does not provide a justification for non-allocation of the site in Inskip or elsewhere. Policy SA1/13(3) specifically relates to the siting of development recognising the rural nature of the site. The Local Plan includes additional policies relating to design (Policy CDMP3) and landscape matters (Policy CDMP4 (14-16)).</p>  |
| <p><b>8.</b></p> | <p><b>Location – lack of services and amenities</b><br/>                     Unsustainable location. Limited local amenities. Lack of primary school capacity and concern that funds from developments in the village have been, and will be diverted elsewhere. Secondary schools a distance away and over-subscribed. Limited health facilities – nearest Gt Eccleston. No shop. No locally based taxi service. New development will not mitigate the lack of services.</p> | <p>It is not accepted that Inskip is an unsustainable location for the scale of development proposed. It is appreciated that Inskip does not have the level of service provision of villages such as Great Eccleston and Hambleton – hence why these villages are classed as “Rural Service Centres” in the settlement hierarchy, however Inskip residents have access to services and facilities – including a primary school, community halls, pub, church and public open space/recreation options - in the village itself, whilst a wider range of services and facilities, including local retail provision, are a short distance away in Great Eccleston which is accessible by public transport, as is Preston. There is also a limited service and facility offer in nearby Elswick.</p> <p>With regard to secondary schools, the Infrastructure Delivery Plan acknowledges that there is a need for increased/expanded secondary education infrastructure to support growth in the borough but that it is anticipated that there is scope to expand local schools in the area with any expansion being funded through developer contributions. This is given force by Policy SP7 – Infrastructure Provision and Developer Contributions. It is noted that a school bus service operates that provides access from Inskip to Garstang High School – a journey of 30-40 minutes.</p> <p>The council has published an Infrastructure Delivery Plan which describes the level of infrastructure on offer and the improvements in infrastructure the Plan will seek. This includes expanded primary education provision at Inskip</p> |

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|      |  | <p>(see also policy SA1/13). As a result of discussions with the Parish Council, the allocation policy SA1/13 also includes a requirement for a village green – a specific request from the Parish Council that has been incorporated into the Plan. Policy SA1/13 also requires local retail provision to be provided (outline planning permission has been granted for a shop as part of a development for 55 dwellings on part of the site).</p> <p>It should also be noted that whilst the council can work with providers to provide enhanced or new services and facilities, it has no control over the day-to-day operation of such services, including matters such as opening times or staffing levels.</p>   |
| 9.   | <p><b>Location – limited sustainable transport</b><br/>                     Development should be located so as to minimise travel and maximise the use of sustainable transport modes (NPPF P12:34). Limited public transport – bus every two hours. Doesn't facilitate sustainable modes of transport</p>          | <p>Currently there is a single bus service – the no. 80 operated by Preston Bus on behalf of Lancashire County Council - approximately every two hours throughout the morning to early evening weekdays and Saturday providing connectivity to Myerscough Collage (some 25 minutes away) and Preston town centre (also some 25 minutes away), via Elswick (in Fylde) and Great Eccleston. A school bus service provides connectivity to Garstang High School. Clearly although a regular service, the main service is not as frequent as in some other settlements. However, the level of public transport accessibility has to be balanced against the need for new housing taking into consideration constraints that affect development potential elsewhere – particularly highway capacity and flood risk. Additional development could contribute towards safeguarding existing services as well as potentially supporting extension to services. Future bus service provision – whether that be an increased or reduced service – is not at the behest of the council.</p> |
| 10.  | <p><b>Loss of agricultural land/prioritise brownfield land</b><br/>                     The loss of good quality agricultural land – best agricultural land in the area – is not consistent with the NPPF (P26:112). Loss of agricultural land impacts on the rural economy. Need to retain agricultural land to</p> | <p>Wyre is a borough with a very limited supply of previously developed land. The Local Plan maximises the use of deliverable previously developed land in meeting development needs. The Publication Draft Local Plan makes has</p>   |

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|      | <p>feed the nation post Brexit. Land to the south of Preston Road is poorer quality and should be proposed. The council should prioritise brownfield land first. The council should meet its brownfield quota.</p>                                | <p>allocated wellings on brownfield land in the Publication Draft Local Plan (allocations made under policies SA1, SA3 and SA4).</p> <p>It is inevitable that agricultural land is used for development to meet identified needs. Although the preference is that the least best quality is developed, this is not always possible and a balance has to be struck between development needs and the loss of agricultural land. This is entirely in line with the NPPF which, it is noted, requires councils to “boost significantly the supply of housing” (para. 47).</p> <p>It should further be noted that the land to the south contains the operational infrastructure of a working farm. The loss of this infrastructure would entail the loss of the farm building and consequently the farm business. It is considered that the loss of the farm itself would have a greater impact on the local rural economy and food production.</p> <p>It is noted that through the Fleetwood-Thornton Area Action Plan the council has indeed prioritised the development of brownfield sites. However these have largely been developed. A number of respondents have stated that the council should meet its brownfield quota. It is noted that there is no longer a requirement at national or regional levels for any council to meet a quota for the amount of development on previously developed land.</p> <p>A number of comments refer to food security and Brexit. At present the impact of Brexit is unknown and there is nothing in government policy that is suggestive that local planning authorities should divert growth away from areas of agricultural land as a result of concerns over food security.</p> |
| 11.  | <p><b>Local highway network</b><br/>The 2017 LCC highways report does not undertake a local assessment of constraints on rural areas. The report sets a cap of 200 dwellings combined for Inskip and St. Michaels but only based on strategic</p> | <p>The highways evidence provided by Lancashire County Council considers the nature and capacity of the local network and considers that it can support an additional 200 dwellings from February 2017 over and above that committed. The 200 dwelling limit is reflective of the “limiting capacity of</p>   |

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|      | <p>highways constraints and in particular at motorway junctions. This is in conflict with NPPF para 162 – NPPF does not distinguish between strategic network and local roads. The Highways authority has ignored local traffic. Highways assessment for sustainability for Inskip route appears to be lacking. Lanes around Inskip with struggle with commuting, existing lanes are narrow. Development should be close to jobs to reduce commutes and close to more sustainable settlements which have local services and facilities. Inskip allocation not aligned with section 4 of NPPF. Inappropriate local highway network for the scale of development proposed. Roads are narrow and unsuitable. Local roads in poor condition - including subsidence and flooding (especially relating to Pinfold Lane). Roads already struggle with traffic capacity. Possibly 600 extra car journeys per day will be created. Will create congestion on surrounding village roads. Nearest access to the motorway network is M6 Junction 32. Local road network not considered through the highways evidence which only considered strategic road network. Pinfold Lane not suitable for increased traffic heading north. Would not be a safe local highway environment especially with on-road car parking associated with the school. Increased risk of accidents. No plan to show how to adopt, improve antiquated, agricultural highway infrastructure.</p> <p>Query why Inskip is grouped with St. Michaels for the purposes of the highway evidence.</p> | <p>rural local roads through Woodplumpton” (page 79). The evidence goes on to state that School Lane is narrow and that a development of significant scale must address this through a Transport Assessment. The development will be required to meet the requirements of policy CDMP6 Accessibility and Transport. The highways evidence at page 103 sets out a number of interventions necessary to deliver the level of growth proposed for the borough. It acknowledges that constraints will still exist. The fact that Wyre has a large rural hinterland with a rural road network has been taken into consideration within the highways evidence.</p> <p>It is accepted that Pinfold Lane is not the most appropriate route travelling north, however it is only one of several routes from Inskip into the wider hinterland – as such there is a choice of routes. If necessary Pinfold Lane can be widened near its junction with the B5269. Matters such as this will be considered at the masterplanning stage.</p> <p>The Local Plan identifies land for the expansion of the School some of which could incorporate a drop-off facility.</p> <p>The explanation for the grouping of Inskip and St.Michaels is given on page 45 of the highway evidence provided by Lancashire County Council. St. Michael's on Wyre and Inskip lie in a separate common zone with regards to the A6 corridor constraints issues.</p> |
| 12.  | <p><b>Highway constraints capable of being resolved</b><br/>Highway constraints are capable of being resolved in more sustainable locations such as the urban peninsula thus allowing development to be focused in more appropriate locations.</p>   | <p>The evidence provided on highway capacity by Lancashire County Council takes into account potential improvements to the highway network in deriving the highway cap figures across the borough.</p>  |
| 13.  | <p><b>Affordability and housing mix</b></p>  | <p>In relation to the market price for housing, this is not a matter for the local plan. The local plan contains a policy (H3) designed to deliver 30%</p>  |

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|                   | <p>The new houses will be unaffordable. Wages insufficient to buy at the prices offered. Affordable housing on a new development of 27 houses is not being implemented/changed from original plans. No social or starter homes. Successful engagement with a social housing service provider should be included in the Wyre Local Plan as a pre-requisite for planning consent for each housing allocation. Houses will be larger properties. The Plan does not accommodate the needs of the elderly.</p> | <p>affordable housing in Inskip subject to viability considerations. The development of 27 houses at Inskip known as Ash Meadows includes eight affordable houses (30%). Originally this was to consist of three social rented dwellings and five intermediate dwellings whereby the property would be sold at 80% of the market value. Owing to the difficulty of engaging with the social rented sector for these three properties, the council has agreed that the social rent dwellings be re-designated as “intermediate” on the same basis of the original five dwellings. ‘Intermediate’ housing falls under the definition of “affordable” within national planning policy and as such meets the requirements of the Local Plan. It is also noted that a larger scheme will generate a higher number of affordable dwellings and it may be that the quantum on offer becomes more attractive to the social rented sector.</p> <p>In terms of the possible mix of properties and provision for the elderly, Policy HP2 will apply. This is also a matter that can be considered through the masterplanning exercise proposed by allocation policy SA1/13.</p> |
| <p><b>14.</b></p> | <p><b>Demand</b><br/>                     Inskip is an isolated/remote location hence there is limited housing demand. New houses (Ash Meadows) being built in the village are slow to sell – proof of limited demand. People would rather live in more sustainable and affordable locations where there is more housing choice – e.g. more houses being built in Preston.</p>  | <p>The site is being promoted by a landowner/developer. There is no cogent evidence to suggest that the site will not be delivered over the Local Plan period due to a lack of market demand. The Ash Meadows development is fully under construction with some 14 built and 13 (mostly the affordable dwellings) under construction as of October 2017. Of the 19 market houses it is understood that twelve properties are either sold (3) or reserved (9) (Create Homes web site, November 2017). Of the remaining seven properties, two are show houses. Comments have been made in relation to the sale price of these properties, but this is not an issue for the local plan.</p>   |
| <p><b>15.</b></p> | <p><b>Employment</b><br/>                     Housing development does not match the fact that there is very little employment in the area. Job losses expected at BAe Warton. No new</p>   | <p>It is acknowledged that residents in smaller settlements in Wyre will access employment outside the particular settlement. There are employment opportunities at Nightjar to the south of the village, along the A6 and at Preston.</p>   |

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|                   | <p>jobs being created in Wyre villages. The development will therefore increase commuting. Inskip will become a commuter suburb.</p>  | <p>To support the local economy, the Local Plan makes provision for 43 hectares of employment land across the borough, this includes the allocation of 3.92ha of land within the rural area. The allocation of 1 hectare of employment land at the neighbouring higher order settlement of Great Eccleston will provide rural employment opportunities in the wider area.</p> <p>Job losses at BAe Warton is not particularly relevant to Inskip albeit current residents may be working there.</p>  |
| <p><b>16.</b></p> | <p><b>Flooding/drainage</b><br/>                     There is existing flooding of fields and roads. Surface water flood risk. Flooding around the village can render it inaccessible to family cars. Development would destroy the natural drainage of the land, exacerbating flooding. Highways cap of 200 is for Inskip and St. Michaels but the full quota goes to Inskip because St. Michaels has flooding issues – Inskip also has flooding. EA flood maps change so not the only basis. Inadequate drainage and sewerage system.</p> | <p>The National Planning Framework supports the policy of directing development to areas of least flood risk (NPPF para. para. 101). The subject site lies wholly within flood zone 1. Parts of Inskip to the south and east lie within flood zones 2 and 3 (with 3 being the zone of greatest probability of flooding). St. Michaels is extensively covered by Flood Zones 2 and 3. It is the council’s view that the decision to direct development to an area of lowest probability of flooding in Inskip is a sound strategic approach.</p> <p>The flood zones produced by the Environment Agency do not cover all types of flooding (being focused on riverine and coastal flood risk) and can indeed change over time. However the council has to use the best evidence available at the time. Further, as part of its evidence base, the council has produced a detailed Strategic Flood Risk Assessment (Level 2). This found no reasons on the basis of flood risk and drainage to suggest that the site should not be allocated.</p> <p>Through work on the Infrastructure Delivery Plan (IDP), United Utilities have not objected to the allocation. Sewerage companies (United Utilities in this case) have a legal obligation to ensure that adequate sewer treatment infrastructure is provided to meet the requirements of new residential development. The Local Plan recognises the importance of ensuring suitable surface water discharge mechanisms are in place for all sites. Policy CDMP2 -</p> |



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|      |   | <p>Flood Risk and Surface Water Management requires the use of Sustainable Drainage Systems (SuDS) and establishes a priority list for surface water drainage such that connection to the public sewer only occurs as a last resort. The development of SA1/13 will be subject to the provisions of Policy CDMP2. Moreover the allocation policy requires that surface water should drain into Inskip Brook. It is understood that there is a misconnection of local highway drainage and also a residential property around Derby Crescent but that these are to be addressed by the appropriate bodies.</p>  |
| 17.  | <p><b>Impact on wildlife</b><br/>Development will affect wildlife. This development would kill areas of biodiversity.</p>   | <p>The development of land of an agricultural field may have some ecological impact. The land in question carries no national or local environmental or ecological designation. Allocation Policy SA1/13 (9) requires that the development should consider ecological impact and mitigated. Policy CDMP4 (10-13) will also apply.</p> <p>The Local Plan is supported by a Habitat Regulation Assessment (HRA) to identify possible impacts on sites protected under European Law for nature conservation and the Local Plan has been amended to take account of recommendations. Advice has been taken from the Greater Manchester Ecology Unit in preparing the Plan.</p> |
| 18.  | <p><b>Public Rights of Way</b><br/>Will have a negative impact on a PROW that cannot be mitigated against – not compliant with Publication Draft Local Plan policy CDMP6.</p>         | <p>The allocation site north of Preston Road abuts PROW FP34 which forms the western-most boundary. The footpath then leaves the allocation to skirt a field boundary to meet Pinfold Lane north of the allocation. Policy CDMP6 will apply to the development of site SA1/13. The existence of the PROW does not necessarily preclude development. The allocation conveys the acceptance of the principle of development, not the detail. To make the position clearer, however, the council propose a minor amendment to the Key Development Considerations that recognises the Public Right of Way.</p>   |
| 19.  | <p><b>Settlement Hierarchy</b><br/>Inskip is incorrectly categorised as a Main Rural Settlement – should be a small rural settlement as per the settlement study. Inskip has been</p> | <p>The council consider that Inskip has been correctly identified as a “Main Rural Settlement”. It is noted that the Wyre settlement hierarchy is distinct from that in Fylde which uses a different methodology. There is no</p>  |

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|                   | <p>treated differently than nearby Elswick (in Fylde) which is a Small Rural Settlement in the Fylde Plan. The reasons for Inskip’s categorisation is not explained in the settlement study, local plan or anywhere else in the evidence base.</p>  | <p>requirement or obligation on local authorities to use similar or the same methodology for evidence base work. Wyre’s methodology is sound and robust.</p> <p>It is also noted that being a hierarchy, the positions of settlement are relative. Main Rural Settlement sit below Rural Service Centres (typically larger villages with greater concentrations of population, access to a greater level of service and employment provision) and above Small Rural Settlements (typically small population centres, with very limited or no service provision). The hierarchy is set for the Plan period and is therefore required to take into account the potential level of development and any proposed new services and facilities. The council has produced an addendum to the Settlement Study background paper explaining the derivation of the settlement hierarchy (December 2017).</p> |
| <p><b>20.</b></p> | <p><b>Issues and Options</b><br/>Different than I&amp;O strategy. Alternative options in Inskip not considered.</p>   | <p>It is indeed correct that the strategy pursued by the local plan is not directly comparable to the three options expressed in the Issues and Options Paper. It is a hybrid option based in particular on constraints associated with highways capacity and flood risk.</p> <p>The Issues and Options indicated a number of different alternative sites that have been considered for development in Inskip. The allocation site was one of the options considered and was indicated in the Issues and Option Report.</p>  |
| <p><b>21.</b></p> | <p><b>Pollution, health and climate change</b><br/>Pollution will increase along with the carbon footprint. Will use more natural resources and increase waste. Negative impact on air quality. Negative impact on healthy lifestyles. Doesn’t encourage walking or cycling. No pedestrian footpath/poor quality footpaths. Cycling to and from Inskip is hazardous. More traffic equals more emissions which is contrary to climate change objectives.</p> | <p>By definition development uses resources and increases in a particular locality human activity, including driving. However this is not a justification for non-allocation of the site. There is no evidence that air quality is a particular issue in this locality or that cycling to and from Inskip is hazardous or more dangerous than in relation to other settlements. It is noted that the outline approval for 55 dwellings within part of the allocation is conditioned for the provision of off-site highway works including pedestrian footpaths and a new bus stop. The allocation policy SA1/13 requires the development</p>   |

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|                   |  | <p>of the site to be supported by a landscape and green infrastructure strategy, including play facilities, public open space and pedestrian/cycle connectivity. The allocation also requires the provision of a village green. Climate change matters were considered through the Sustainability Appraisal. Climate change is one of a number of factors the council is required to balance in providing for the development needs of the borough.</p>  |
| <p><b>22.</b></p> | <p><b>Landowner</b><br/>Council colluding with the landowner.</p>  | <p>In order to deliver a “sound” plan the council has to consider options for allocations. Allocations must be deliverable. An aspect of deliverability is availability – in other words the willingness of a landowner to dispose the land for development. As part of developing the Plan the council put in place an extensive process to contact landowners to ascertain their willingness or otherwise to support the principle of allocation. In some cases the council met with landowners This is a common practice and does not indicate that the Council has been ‘colluding’ with any landowner for any other purpose than to progress the Local Plan. If a landowner does not support an actual or potential allocation, then the land is <b>not deliverable</b> (as an allocation) and as such it <b>cannot</b> be allocated. There have been cases where despite landowner support a site has not been allocated due to other factors such as constrained highway capacity. In the case of SA1/13, as with other sites, the allocation has been informed by the evidence base and the views of the landowner and parish council.</p> |
| <p><b>23.</b></p> | <p><b>Objectively Assessed Housing Need/Population Growth</b><br/>The plan OAHN should be based on latest government figures of 313 not 479pa. The allocation is not based on locally assessed need. Office for National Statistics report the population in this area is projected to increase at the lowest rate of all English regions, only 9% between 2008-2033. One of only two regions where the working age population is projected to decrease - evidence there is no justification for almost doubling the size of this "small rural village".</p> | <p>It is the view of the council that its evidence on the OAHN is sound and robust based on appropriate demographic and economic data and following a robust methodology. As required in national policy and guidance the OAHN figure relates to the borough as a whole, not individual areas.</p> <p>Allocations are a result of a number of factors and in Wyre this includes constraints associated with the highway network.</p>   |

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|      |   | <p>The government’s document “Planning for the right homes in the right places” is a consultation document on identifying local housing need. The methodology and the actual figure may change before the document is finalised and published. The transitional arrangements within the document itself advise that Local Plans which will be submitted before 31 March 2018 should continue on the basis of the current figures. As such the Council is unable to give any weight to the draft document as a basis for the Local Plan.</p>  |
| 24.  | <p><b>Site selection</b><br/>                     Process is not clear, not used clear criteria, not logical. The three elements of sustainability have not been considered. Parish Council suggestions ignored. Last minute change by the council.</p> | <p>The site selection process is described in the Wyre Site Allocations Background Paper (September 2017). The Background Paper describes the alternative options in Inskip and why they were not considered to be appropriate for allocation. The reasons include flood risk, presence of an ethylene pipeline and presence of an operational farm. The rationale for the approach taken has been explained to the Parish Council who had put forward their own suggested site allocations. These were considered but were not capable of being taken forward as allocations for the reasons described above.</p> <p>However a key desire of the Parish Council for the provision of a village green has been incorporated in the Local Plan albeit not on the Parish Council’s original preferred location opposite the Derby Arms public house (due to the presence of the ethylene pipeline.)</p> <p>The SA accompanying the Local Plan is a robust document considering the three elements of sustainability. The SA has informed the preparation of the Local Plan. No comments have been received that the SA is inadequate in its scope.</p> <p>The Local Plan is in ‘preparation stage’ until formally considered and approved by the Council for publication. The claim of a “last minute” change of heart by the council is irrelevant and a misrepresentation of the facts. There has not been any change to the allocation at Inskip at the Council</p> |

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|      |  | <p>meeting on the 7 September or subsequently before publication on the 20 September 2017</p> <p>A working draft of the Local Plan which was shared with the Parish Council (late 2016 / early 2017) indicated land to the south of Preston Road as the allocation. This land includes a working farm. Further consideration of options including discussions with the tenant farmer and landowner, it was considered more appropriate and sound that the land to north of Preston Road be put forward as an allocation so as to keep the working farm.</p>  |
| 25.  | <p><b>Impact on a Mineral Safeguarding Area</b><br/>Majority of the site is in mineral safeguarding area – no evidence how policy M2 in Joint Lancashire Minerals and Waste Local Plan (2009) has been assessed for the site.</p>  | <p>A Mineral Safeguarding Area (MSA) covers substantial parts of the allocation north and south of Preston Road. The MSA designation does not precludes development. Lancashire County Council as the Minerals and Waste Planning Authority has not objected to the allocation. The issue of MSA designation was considered through outline planning application 16/00481 for 55 dwellings on land north and south of Preston Road and within the SA1/13 allocation. The application was approved, with the MSA designation being found to have no material impact on the principle of development due to the nature of the deposit.</p>   |
| 26.  | <p><b>Archaeological impact</b><br/>Lancashire Archaeological Advisory service on planning application 16/00481/OUTMAJ advised that there could be archaeological finds and programme of investigation should be undertaken and scheme of mitigation. These matters should be investigated further before final decision to allocate site.</p> | <p>The local plan establishes the principle of development. There is no evidence that there are likely to be finds of such importance that the principle of development should not apply, however Policy SA1/13 notes that findings may exist.</p> <p>It is noted that this is supported by the response from the Lancashire Archaeological Advisory service on the planning application for the 55 dwellings (16/00481/OUTMAJ) which states “The above [description of finds in area and brief discussion of local history] does not suggest that any such remains could be considered to be of sufficient significance so as to require their preservation at the expense of development”.</p> |

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| 27.  | <p><b>Existing development</b><br/>Existing scheme of 27 houses under construction is not mentioned – doesn't give the full picture of development in Inskip.</p>   | <p>Local Plans allocate land for future development to meet identified needs. It would not be appropriate to include on the Policies Map all sites under construction for information purposes. The table in the Local Plan Strategy section sets out the complete picture of development at each settlements (and includes development which may be delivered after 2031)</p>  |
| 28.  | <p><b>House prices</b><br/>Proposal will have a negative impact on house prices.</p>  | <p>Any positive or negative impact on house prices arising from any proposal is not a matter for the Local Plan.</p>  |
| 29.  | <p><b>Broadband</b><br/>Poor broadband connectivity.</p>  | <p>Broadband connectivity is addressed in the Wyre Infrastructure Delivery Plan which describes initiatives to roll out fibre-based broadband to new developments.</p>  |
| 30.  | <p><b>National Planning Framework</b><br/>The allocation is contrary to the NPPF. Various paragraphs referenced primarily dealing with the protection of the countryside/ habitats and the location of development in areas accessible by sustainable public transport options.</p> | <p>The NPPF has to be read as a whole and the various – often seemingly contradictory - objectives and policies considered in the planning balance. This includes the express requirement in the NPPF to meet development needs, subject to constraining factors. It is not accepted that the allocation at Inskip is contrary to the NPPF. It is noted that the local plan, though policies SA1, SA3 and SA4 allocates land sufficient for 5,397 houses of which 5,049 are expected to be delivered within the Plan period. Of these almost 80% are located in locations with good direct access to public transport along the A6 and on the peninsula. It is the view of the council that it has significantly met the guidance in the NPPF in relation to the location of development sites that are accessible to public transport.</p> |
| 31.  | <p><b>Local Plan</b><br/>The allocation (SA1/13) is contrary to the local plan – for instance policies SP1 Development Strategy, CDMP4 Environmental Assets, SP4 Countryside Areas.</p>   | <p>The Local Plan is balancing a number of competing social, economic and environmental matters which includes allocating land for development and protecting the countryside. In a borough with a very limited brownfield supply, inevitably this will require the allocation of land within the countryside. Thus the Plan needs to be read as a whole and the policies read with the allocations in place.</p>   |