

WYRE LOCAL PLAN: EXAMINATION

MATTER 2: STRATEGY AND STRATEGIC POLICIES

WRITTEN STATEMENT ON BEHALF OF REDROW HOMES

REPRESENTOR NO.: 0930

HEARING DATE: 15 MAY 2018

RESPONSE TO KEY ISSUES

ISSUE The spatial distribution of development
NO. 1

1. Cass Associates is presenting this Statement on behalf of Redrow Homes who have an interest in land bounded by Stanah Road and Underbank Road at the eastern edge of the built up area of Thornton.

2. An overriding objective of land use planning is to secure a sustainable pattern of development. It follows that considerable support should be given to concentrating new development in and around the main urban towns along the Fylde Coast Peninsula. These are best placed to accommodate growth because of the range of local services, employment opportunities and transport connections they offer.

3. Every opportunity in and around the main urban towns needs to be considered before decisions are taken to allocate land for development elsewhere, including land at rural service centres and rural settlements and land that, at present, lies in the green belt. Our view on the removal of land from the green belt in Wyre in general and to meet development needs in particular is provided in response to Issue No. 5.

4. To an extent, the Local Plan does set out to focus new development in the urban towns but, ultimately, these towns will absorb less than half of housing and employment growth over the Plan period.
5. It is accepted that the spatial distribution of development will be influenced by a range of factors, including:
 - The availability of previously developed land within, or at the edge of, urban areas
 - The potential to create sustainable extensions at the edge of built up areas
 - The maintenance of an effective green belt
 - Infrastructure and environmental constraints
6. The Local Plan recognises that there is a limited amount of available, previously developed land in the main urban areas. As a consequence, to secure growth at the most sustainable locations, every effort needs to be made to identify extensions to urban areas where new development can be delivered in a co-ordinated and managed way. We believe that there are opportunities for the sustainable extension to the urban area of Thornton along its eastern boundary beyond those already identified in the Local Plan.
7. If the additional opportunities for urban extension are given weight then, in turn, the percentage of new growth at the most sustainable settlements can be increased to a level which is significantly above 47.6%. The added corollary is that there would be no immediate need to review the green belt boundary to meet the requirements for development in the Plan period.
8. The significant advantage to be gained from an increased emphasis on the expansion of the most sustainable urban areas to meet development needs is that maximum use can be made of the established infrastructure that already serves these areas. This point is illustrated in the Infrastructure Delivery Plan (IDP – document reference ED004) where lower order settlements,

such as Great Eccleston and Forton, are distinguished by the fact that significant new investment is needed in support infrastructure. New or new branch health centres and new neighbourhood centres are needed. All settlements will need investment in primary education but the IDP highlights that at the higher order and most sustainable places there is a greater opportunity to build on facilities and services that are already in place.

ISSUE Settlement Hierarchy
NO. 2

9. There are no comments in relation to the position of the settlements in the hierarchy at Policy SP1. However, we believe, for the reasons given in response to Issue No. 1 (the spatial distribution of development) that the opportunity has been missed to increase the percentage of growth to be accommodated at and around the main urban centres (without a need to alter green belt boundaries).
10. Objective 2 within Policy SP1 requires higher order settlements to absorb more growth than settlements lower down the hierarchy. This has to be the approach which is most sustainable. However, less than half of the growth over the Plan period will take place in the most sustainable, higher order settlements. Every effort needs to be made to redress this imbalance, to place a more sustained focus on the main urban towns and a more proportionate expansion in the settlements which are lower down in the hierarchy.
11. One credential which gives the main urban areas a higher sustainability score is employment opportunities. There is an inter-play between employment growth and housing growth. This occurs at a district-wide level but is also pertinent at different levels of the settlement hierarchy.
12. Thornton is an example of where employment growth and housing growth should be considered in parallel. The Hillhouse Technology Enterprise Zone is a key place for new employment opportunities over the Plan period. The Local Plan identifies the potential for additional job creation in the Enterprise Zone and also requires the delivery of 250 dwellings. The new housing within the Enterprise Zone will add strength to the relationship between where people live and

employment opportunities but we believe that there is potential to further strengthen the alignment between housing and employment at Thornton by ensuring that all reasonable opportunities are taken to secure, through the Local Plan, the sustainable extension of the town to assist in meeting the housing requirement. If a clear alignment between housing and employment is established in towns such as Thornton then the propensity or need to travel long distances for work is lessened and the pressures on the highway network will reduce, particularly at the peak commuting hours.

ISSUE Green Belt
NO. 5

13. Land in the green belt is characterised by openness and permanence. The permanence of the green belt is important. It encourages the long term management of green belt land for open land uses and it reduces the likelihood of speculation and the mismanagement of green belt land. It follows that green belt boundaries should be endure and should only be changed in exceptional circumstances.
14. In order to protect the integrity of the green belt and to support its permanence, the exceptional circumstances test dealing with the changes to green belt boundaries is stringent. In accordance with paragraph 84 of the framework, any review of green belt boundaries should account for the need to promote sustainable patterns of development.
15. We have argued in the context of Issue No. 1 (the spatial distribution of development) that the most sustainable pattern for growth through new development will be achieved by optimising the amount of housing and employment land in and around the main towns. This must be the priority option when looking to put in place the most sustainable patterns of development across the district of Wyre. All opportunities for the sustainable extension of the main urban areas need to be examined exhaustively before attention turns to the release of land from the green belt to meet development needs.
16. The green belt background paper (reference ED008) confirms that the release of land from the green belt in Wyre has not necessarily been driven by the pressure to meet development needs.

The decision was made on the basis that the sites in question make a limited contribution to the purposes of including land in the green belt. However, the land in question is open and any development on that land would represent encroachment. The land does make a contribution to the fundamental aim of keeping land open. This is the key characteristic of the green belt.

17. The exceptional circumstances argument in this case is not sufficiently compelling. The changes to the green belt boundary are not required to meet development needs per se as there are options for the sustainable expansion of main towns, in addition to those that the Local Plan proposes to allocate, which can be brought forward without the need to alter green belt boundaries.
18. The Framework (at paragraph 82) makes it clear that exceptional circumstances to justify the change to green belt boundaries include planning for large scale developments such as major urban extensions or new settlements. The emphasis in the Framework is on the permanence of the Green Belt (paragraph 83). The green belt background paper (ED008) at paragraph 64 argues that the areas of land proposed in the draft Local Plan for removal from the green belt do not robustly meet the five purposes for including land in the green belt. This is not a specific consideration given in the Framework. Even if the purposes are not robustly met, there remains the fundamental aim of green belt to keep land permanently open : openness and permanence are essential characteristics. For this reason, we do not believe that the Local Plan should seek to remove land from the green belt.

Overall

19. We do not consider that the Local Plan is justified because it does not outline the most appropriate strategy when considered against reasonable alternatives. There are opportunities to distribute development in a way that takes greater advantage of the sustainability credentials of the main towns and that does not require changes to the green belt boundary.