

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 2: Strategy and Strategic Policies****Issue 1: Spatial Distribution of Development***1.1 Is the strategy for the distribution of development (described as 'dispersal') justified?*

- 1.1.1 Prior to its introduction through the Submission version of the Local Plan consulted on in September 2017. Three spatial options for distribution of development were proposed by the Council: Concentration to the Fylde Coast Peninsula; A6 Corridor focus; and Dispersal. Of these, the Fylde Coast Peninsula Option was found to be the most sustainable following appraisal by the Council through the SA.
- 1.1.2 Yet despite this, the Fylde Coast Peninsula Option was not advanced with the Council instead selecting a 'hybrid' option in response to highway constraints information put forward by LCC Highways. The LCC highways information forms the basis to the distribution of development within the Local Plan and as such is integral to the plan preparation process yet despite this, this evidence has never been fully published and subject to public consultation.
- 1.1.3 Our Client holds significant concerns with the spatial approach adopted by the Council. In our Client's view the dispersal of development around the Borough brings the spatial strategy into conflict with the settlement hierarchy which identifies all five most sustainable locations within the Borough within the Fylde Coast Peninsula. The spatial strategy selected for the Local Plan therefore has questionable sustainable merits.
- 1.1.4 The dispersal of development away from the core sustainable locations of the Borough, will increase travel across the highway network, as people need to travel further to access job, services, shops and services. It reduces the effectiveness of the Local Plan in supporting its main town centres and encouraging the investment within the Borough's urban areas.
- 1.1.5 Our Client does not object to the sustainable villages of the Borough growing proportionately over the plan period and indeed supports this. However, to provide a sustainable pattern of development and reduce reliance on unsustainable modes of transport, a greater emphasis

should be applied to those areas of the Borough which hold a greater level of employment opportunities, services and facilities, and are better connected by public transport.

- 1.1.6 The Fylde Peninsula Towns provide an opportunity to meet development needs at locations which are subject to the best range of services, are in close proximity to existing and planned strategic employment sites and have the best public transport connections in the Borough. Evidence provided within Figure 2.5 of the submission Local Plan clearly illustrates that the Borough holds strong commuting connections to Blackpool (both inwards and outwards). The Fylde Peninsula towns are the most closely related to Blackpool geographically, economically, socially and through transports infrastructure.
- 1.1.7 The above factors help to limit the reliance on the car of residents living in these areas, with any journeys undertaken by car likely to be more limited in length than for those people living in more rural parts of the Borough. As a result, the impact on the Fylde Peninsula Option on the strategic highway network is less likely to have as significant an impact than the dispersed option selected by the Council, providing greater scope for full housing needs to be met.
- 1.1.8 In view of the shortfall, further growth should be directed to the Fylde Peninsula to secure the housing needs of the Borough and deliver a sustainable pattern of development. In order to ensure that there is sufficient capacity within this area to accommodate the full objectively assessed needs, the Council should review its existing allocations and consider omission sites. Our Client requests therefore that a session is introduced to the hearings programme for omissions sites.

1.2 Should the LP include a Key Diagram (Paragraph 157 of the NPPF refers)?

- 1.2.1 The inclusion of a Key Diagram will be of benefit to clarity and transparency of the Local Plan. The Key Diagram will allow users of the Local Plan to gain a quick understanding of the context of the Local Plan and its spatial strategy. As such the inclusion of a Key Diagram would benefit the effectiveness and deliverability of the Local Plan.
- 1.2.2 The Key Diagram should set out:
- The key and sustainable settlements of the Borough, including its main retail centres;
 - Its physical characteristics and constraints;
 - Major designations affecting the District;
 - The location of major infrastructure and employment sites;
 - The relationship of District to neighbouring authorities; and

- Major locations for development and settlements identified for growth.

Issue 2: Settlement hierarchy

2.3 Is the amount of development within each level of the hierarchy justified?

- 2.1.1 Poulton-le-Fylde is one of five towns which are identified by the Council at the top tier of its Settlement Hierarchy as "Urban Towns". The inclusion of Poulton-le-Fylde within this tier is justified given its overall size and role within the Borough, range of services, facilities, shops and services, and range of and accessibility to sources of employment.
- 2.1.2 The Table on Page 33 of the Local Plan indicates that Poulton-le-Fylde will deliver the second highest amount of development within the Borough, behind only Thornton. Whilst Fleetwood is larger than Poulton-le-Fylde, its capacity for development is extremely limited due to the absence of available unconstrained land, with only limited redevelopment opportunities available. Normoss and Cleveleys, the two other Urban Towns (also within the Fylde Coast Peninsula), are similarly constrained by the lack of available land, and constraints such as Green Belt, flood risk/the Irish Sea.
- 2.1.3 Poulton-le-Fylde and Thornton are however much less constrained in terms of the land potentially suitable and deliverable for housing. Both settlements hold a similar range of services and are accessible to other Fylde Peninsula Towns. As such the concentration of development at these towns is considered appropriate given the circumstances of the Borough, designation at the top of the settlement hierarchy, and close proximity to other sustainable locations.
- 2.1.4 Whilst broadly supportive of the move by the Council to concentrate development towards Poulton-le-Fylde, our Client is concerned that development at settlements within the Borough is to be capped. The cap applied for each settlement is based on LCC Highways evidence. As set out in greater detail within our Matter 3 Statement our Client is concerned with the approach and robustness of this statement. Our Client does not agree with LCC's and the Council's assertion that settlements within Wyre cannot accommodate additional development without resulting in a severe impact on the Highways network. The strategic highway network is planned for improvement around Poulton-le-Fylde and that improvement should also ease the local road network. Our Client considers that refinement of evidence and an adjusted spatial strategy will enable enhanced levels of delivery to be realised without harmful effects for the road network.

- 2.1.5 More generally the approach of the Local Plan to cap development is inconsistent with Paragraph 14 and 47 of the NPPF which seek to secure the delivery of sustainable development and a significant boost in housing land supply respectively. In view of national planning policy, the housing growth figures for each settlement should be expressed as a minimum requirement.
- 2.1.5 As set out in response to Question 1.1, our Client believes that the most sustainable option for meeting housing needs in Wyre is to concentrate development towards the towns on the Fylde Peninsula.
- 2.1.6 Whilst our Client welcomes the approach of the Council to accommodate a larger proportion of development at Poulton-le-Fylde, our Client considers that there is further scope for the Council to accommodate additional development at the town which will help support the full delivery of the plan requirement.
- 2.1.7 Poulton-le-Fylde is uniquely placed within the Borough, not only possessing a strong level of shops and services, as well as access to the Borough's key employment sites but is benefits from strong public transport connections to Blackpool, Preston and Manchester. High Quality bus services link the town to Blackpool, an important local source for employment, shops and services. Poulton-le-Fylde is also home to the only railway station in the Borough. Providing regular connections to Blackpool, Preston and Manchester. The line is subject to ongoing electrification works to enhance capacity and service reliability.
- 2.1.8 Opportunities are known to exist to accommodate further development within the town sustainably. Two such locations are provided by our Client's land interest at Blackpool Road and Oldfield Carr Lane.
- 2.1.9 Blackpool Road is already identified by the Council as part of a draft allocation for housing (See Site reference SA1/8). The Site is identified for 154 dwellings, with capacity limited above this due to highways constraints. Our Client considers that further development could be achieved on site owing to the Site's accessibility to existing bus services, the town's railway station, and the town centre. As a result, the Council's standard assumptions regarding predicted trips for a Site of this scale should not be the same as those applied for other similarly scaled sites within the Borough. Instead a lower trip generation should be assumed. The result, even taking the highway capacity constraints as read, is a Site which could accommodate further development.

2.1.10 Our Client's land interest at Oldfield Carr Lane (a significantly smaller part of SHLAA site reference PFY_24) is considered to have a capacity for 350 dwellings (Site Location Plan provided in Appendix 1). The Site is located to the south east of Poulton-le-Fylde and is easily accessible to a number of services including Carr Head Primary School, a Nursery, Baines Secondary School, Tesco Express, Poulton Industrial Estate, and an existing bus route. The Site is located just south of Oldfield Carr Lane with land to the north currently being developed by Redrow for 100 dwellings and Site Allocation Reference SA1/5 – Land South East of Poulton, Poulton-le-Fylde, identified for 236 dwellings. As a result, it is clear that the Council accept in broad terms the locational sustainability and suitability of this area for housing which is considered to be shared by Land at Oldfield Carr Lane, by our Client. Our Client considers this site should consider as a further allocation through the Local Plan and requests that omission site hearings are added to the Examination Programme.

2.4 Is there sufficient alignment between housing and employment at different levels of the hierarchy?

2.2.1 As set out above, there is clear justification on account of absence of deliverable supply, as to why some settlements within the hierarchy meet a higher proportion of development than other towns in the same tier. The approach of the Council in this regard as it maximises both plan deliverability and a sustainable pattern of development within specific sub-areas of the Borough.

Issue 3: Settlement Boundaries and the Countryside

3.2 Is Policy SP4 consistent with national policy particularly in respect of protection of the countryside and conversion of buildings?

3.1.1 The clear function of Policy SP4 is to protect the countryside for its own sake. The approach of Policy SP4 conflicts with the NPPF. The NPPF only seeks to protect and enhance valued landscapes (See Paragraph 17 – Core Planning Principles, and Paragraph 109 of the NPPF). As such there is no blanket protection to the countryside in National Planning Policy other than where demonstrated by landscape quality.

3.1.2 The observation above is made consistent with findings of the Inspector in Paragraph 21 of the Land East of Wolvey Road, Three Pots, Burbage Appeal in Hinckley and Bosworth issued in January 2014 (see Appeal Reference APP/K2420/A/13/2202261 – See Appendix 2). In this

Appeal the same wording of Saved Policy NE5 was found to hold less weight due to the conflict with the NPPF.

3.1.3 This conclusion is also reflected in the Land West of London Road, Newport Essex Appeal in Uttlesford, issued in October 2017 (see Appeal Reference APP/C1570/W/16/3166101 – See Appendix 3). In this decision the Inspector concluded that the word “protect” did not reflect the wording of the NPPF which seeks to “recognise the intrinsic character and beauty” of the countryside. As such the wording of the Council’s policy applied a more restrictive approach than the NPPF and was applied limited weight for the determination of the Appeal.

3.1.3 In view of the above, it is clear that Policy SP4 is inconsistent with the NPPF and in need of revision to remove this reference. Instead the policy should be re-orientated to control the form, type and scale of development which might be permitted within the open countryside.

Issue 5: Green Belt

5.1 Have exceptional circumstances been demonstrated to justify the alteration to Green Belt boundaries?

4.1.1 Our Client agrees that in this case there is sufficient justification to review and alter the boundaries of the Green Belt. The most significant reason for this is the evidenced absence of available, deliverable, and achievable brownfield land within the Borough at which to meet the identified housing need and the arising shortfall between the housing requirement and assessed housing need. Both factors above indicate supply side constraints meaning that additional sources of land supply are required in order to maximise delivery.

4.1.2 It is acknowledged that Green Belt land covers a relatively small proportion of the Borough concentrated to western areas. However, it must also be taken into account that this Green Belt is located adjacent to, and thus constrains, the growth of the five most sustainable settlements within the Borough. As such in order to ensure that the spatial strategy adequately supports the role and sustainability of these settlements, and provide for a sustainable pattern of development, there is a requirement to release land from within the Green Belt.

4.1.3 Applying national planning policy, only sites which are deemed not to contribute to the five purposes of the Green Belt (as defined through Paragraph 80 of the NPPF) should be released. It is noted that the Council’s Green Belt Assessment (May 2016) concludes that

there are 3 such parcels within the Borough. This includes our Client's land, South of Blackpool Road, Poulton-le-Fylde which is located within Parcel 20.

5.2 How should the LP be modified to demonstrate exceptional circumstances, assuming that such circumstances have been justified?

4.2.1 Our Client agrees that there is a need for the Local Plan to be amended to better articulate the justification for Green Belt release to secure the soundness of this approach. At present the Council's statement supporting this approach relates only to the presence of the Green Belt at the majority of its large sustainable settlements. This should be expanded to refer to the housing requirement, the absence of sufficient brownfield and non-green belt land at these locations to deliver this, and the need to provide for a sustainable pattern of development.

5.3 Is there a justification for the removal of more land from the Green Belt?

4.3.1 Our Client considers that this justification is provided by the following three matters:

- The acknowledged shortfall between the assessed level of housing need and housing requirement;
- The need to ensure that the employment and housing strategies of the Local Plan are aligned and integrated (consistent with Paragraph 158 of the NPPF);
- The need to provide for a sustainable pattern of development and ensure that the spatial strategy is sufficiently responsive to the settlement hierarchy.

4.3.2 The Local Plan aims to meet 86% of the assessed housing needs of the plan based on identified infrastructure constraint. As set out previously however, the areas designated Green Belt adjoin the most sustainable and well-connected parts of the Borough, and as such is unlikely to have the same impact on highways infrastructure as locations away from these areas due to the availability of public transport infrastructure.

4.3.3 Whilst the Council do not propose to meet its full housing requirements, the employment needs of the Borough are to be met in full. The failure of the Council to deliver sufficient housing land in tandem with employment land could threaten the delivery of the economic aims of the Plan due to insufficient labour supply.

4.3.4 In Wyre the integration of housing and employment land strategies is all the more important given the unique geography of the Borough. The Borough is split by the River Wyre Estuary

with only two routes connecting the eastern and western sides. As such, the eastern and western sides of the Borough are fairly disconnected from one another meaning that it is even more important to ensure that the location of employment and housing are aligned to limit unsustainable travel within the Borough.

- 4.3.5 In response to the above, our Client considers that there is a clear need for further releases from the Green Belt to ensure that housing delivery is maximised, the employment targets of the Plan are deliverable, and that employment and housing land strategies are aligned.
- 4.3.6 Opportunities to secure the delivery of this additional development need are known to exist. This includes our Client's land interest at Blackpool Road, Poulton-le-Fylde. Whilst already identified as an allocation within the submission Local Plan, is considered by our Client to hold a greater capacity than identified by the Council (See our Matter 8 Hearing Statement). The Site is acknowledged by the Council as suitable for housing and forms a sustainable location. The Site also sits within a wider land parcel (Parcel 20) which has been assessed by the Council as fulfilling a weak contribution to the purposes of the Green Belt as defined by the NPPF, and as such, in accordance with national planning policy, is unnecessary to be kept permanently free from development. In response to this, and the arising shortfall in housing provision, the Council should increase the allocation identified for this Site.