

Examination into the Wyre Local Plan – May 2018**Comments on behalf of Story Homes****Consultee ID: 0360****Matter 8: Allocations (Poulton-le-Fylde)****Issue 1: Identification of Sites**

1.1 Is the approach within the Strategic Housing Land Availability Assessment (SHLAA) to assessing the suitability and screening of sites in Poulton-le-Fylde robust?

1.1.1 Our Client is concerned with the assessment made of Site reference PFY_24 SHLAA. Sites are sieved out under six parameters – Green Belt, location, scale, recreation, use and Flood Risk. The SHLAA confirms that the Site was sieved out on account of its scale relative to the size of Poulton-le-Fylde. Our Client has since submitted a rationalised scheme which is proportionate in scale to the settlement at 350 dwellings.

1.1.2 Our Client considers that the Council should have sought to review its SHLAA in light of the emerging shortfall of supply against the assessed level of housing need, in order to discover whether any further allocations could be made. This process would have revealed additional potential supply to achieve this.

Issue 3: South of Blackpool Road, Poulton-le-Fylde (SA1/8)

3.1 Have exceptional circumstances been demonstrated for removal of the site and adjoining land from the Green Belt?

2.1.1 The exceptional circumstances required by national planning policy for the review and release of land from the Green Belt is provided by the following factors:

- The uplift in the assessed level of housing need in contrast to the adopted housing requirement;
- The shortage of available, deliverable and achievable brownfield land;
- The constraint provided by Green Belt land at the Borough's most sustainable settlements;

- The need to align the spatial planning strategies for the development of housing and employment land; and
- The connectivity of areas within the Green Belt to public transport, shops, services and sources of employment which will help minimise the reliance of residents on cars and limit the impact on the local highway network.

2.1.2 More locally, there is a shortage of available land which is considered available and suitable for housing in Poulton-le-Fylde. The Site is well related to the existing built up area, and is highly accessible to nearby existing services, shops, and sources of employment. Other sustainable settlements within the area are heavily constrained by flood risk within which housing would not be permitted. As such there is a need for a greater amount of development to be accommodated at Poulton-le-Fylde to respond to the housing needs of these settlements.

2.1.3 The case for releasing this Site (and wider Parcel) from the Green Belt for development in National Planning Policy terms is provided within the Green Belt Assessment conducted by the Council in May 2016. The Assessment concludes that the Site is one of three parcels within the Borough designated Green Belt which fulfils a weak role for the purposes of the Green Belt as defined in Paragraph 80 of the NPPF and as such there is no justification for the Parcel to remain permanently open and free from development.

2.1.4 Our Assessment of the wider Parcel (Wyre Borough Council reference: Parcel 20), within which SA1/8 is located, against Green Belt functions is provided Table 1 below.

Table 1: Parcel 20 Green Belt Assessment

Green Belt Function	Parcel Role	Rationale
To check the unrestricted sprawl of large built-up areas	Weak	The Parcel is fully enclosed on all sides by forms of development. As such the Parcel does not fulfil this Green Belt function. The development of the Parcel would not expand the urban area into the countryside in any way.
To prevent neighbouring towns merging into one another	Weak	The settlements of Poulton-le-Fylde and Carleton are already linked by development to the east and west. Carleton is not

Green Belt Function	Parcel Role	Rationale
		<p>recognised by the Council as a separate settlement to Poulton-le-Fylde within the settlement hierarchy as such it is clear that the need to maintain separation between these areas is not a strategic priority for the Council. The Parcel does not form part of land which separates Poulton-le-Fylde from wider towns such as Blackpool, Thornton and Cleveleys which hold much greater importance strategically.</p>
<p>To assist in safeguarding the countryside from encroachment</p>	<p>Weak</p>	<p>Whilst undeveloped and in agricultural use, the Parcel is isolated from the wider countryside. The Parcel is surrounded by development and as such forms a contained site. Its development will not therefore lead to encroachment of the countryside.</p>
<p>To preserve the setting and special character of historic towns</p>	<p>Weak</p>	<p>Poulton-le-Fylde Conservation Area is acknowledged to be located to the south west of the Parcel. This part of the Parcel however is not developable and as such will remain open. The wider Parcel holds a limited relationship to this Conservation Area. The development will not therefore harm the setting or significance of this historical designation.</p>
<p>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p>	<p>Not Assessed</p>	<p>The Council has established that there is an insufficient supply of available, deliverable and achievable brownfield land within the Borough. As such there is a need to develop Greenfield Sites. All of the most sustainable settlements in the Borough are located at the Fylde Peninsula. These settlements experience constraints to development due</p>

Green Belt Function	Parcel Role	Rationale
		to Flood Risk, the absence of available land, and the Green Belt. As such in order to provide for a sustainable pattern of development there is a need to review and release land from within the Green Belt.

3.2 Does the site play a role in preventing Poulton and Carleton merging into one another?

2.2.1 In planning policy terms, Poulton-le-Fylde and Carleton are not recognised as separate settlements. This is illustrated within the settlement hierarchy as set out in Policy SP1 of the Local Plan. Carleton does not feature as a named settlement within this list, and as such does not feature within the Council's strategic approach for the Local Plan. The maintenance of Carleton as a separate place to Poulton-le-Fylde is not therefore a strategic priority for the Council.

2.2.2 The settlements of Poulton-le-Fylde and Carleton are already adjoined by developments along Tithebarn Street to the east of the Parcel, and Blackpool Road to the west. As such the Parcel does not fulfil a strategic role in preventing coalescence of this area to large urban areas as otherwise fulfilled by Land west of Blackpool Road (separating Poulton-le-Fylde from Bispham), to the south west of Poulton-le-Fylde (separating Poulton-le-Fylde from Blackpool, and to the north west of Carleton (separating Carleton from Cleveleys/Bispham and Thornton).

2.2.3 On a local level, development of the Parcel would not advance the developed area of Carleton any further eastwards towards Poulton-le-Fylde than existing development. To the south development would be limited by flood risk from Horsebridge Dyke which flows along the southern boundary. As such any separation to the south, however limited this is in strategic planning terms, would be maintained.

3.3 On the assumption that the land should be removed from the Green Belt, should the size of the allocation be increased to include 'white land' to the west?

2.3.1 Our Client considers that there is a strong case for this area to be allocated for an increase amount of development than outlined by the Council within the submission Local Plan. This is provided by the following factors:

- The Council do not propose to meet its assessed level of housing need resulting in a shortfall of 1,360 dwellings. There is therefore a pressing need for further capacity to be identified in response to this significant shortfall;
- The Council's Green Belt Assessment has concluded that only three parcels do not make a contribution to the purposes of the Green Belt. This includes Parcel 2, Cardinal Allen School and Parcel 21, Land North East of Poulton Road. Parcel 2 is subject to education use, and as such would require an alternative site to become available in order to accommodate housing at the Site. Parcel 21 is in use for recreation. As a result, the site is not considered developable for housing; and
- The Site is closely related to existing services, facilities, and public transport connections. The Site is also well connected to Blackpool responsive to local commuting and general travel patterns. The result will help minimise the reliance of new residents on cars for travel, helping to reduce the potential impact on the strategic highway network which lies to the east.

2.3.2 The allocation of the Site for 460 dwellings as set out by our Client, would assist the Council in maximising its housing land supply in the context of its assessed level of need and need for affordable housing. Noting the absence of constraint for accommodating this amount of development, our Client considers that Allocation Reference SA1/8 should be modified to 460 dwellings reflecting the red-line boundary as set out within the accompanying visioning document (see Appendix 5). Adapting this approach will ensure the Site reflects our Client's land interest securing the deliverability of the Site for housing.

3.4 Would the requirement for a masterplan prejudice delivery of the Site?

2.4.1 Owing to the scale of the proposed allocation, our Client does not consider that it is necessary for a masterplan to be prepared for the Site ahead of any planning application. Key Development Considerations together with other policies within the Local Plan provide a sufficient guide to help shape the development of the Site. The application process provides the Council with sufficient control on how the site is developed with scrutiny through its development control committee, this includes the application of conditions to require the phasing of development in accordance with programmed/requested highways improvements. The requirement for a masterplan to be submitted upfront may create unnecessary uncertainty/delay and would reduce the capacity of the Site to deliver within the next five years.

- 2.4.2 Should an outline planning application be progressed on the Site, the Masterplan within this would provide for the parameters for future phases of development. Detailed applications would then be submitted in accordance with the principles as set out within the outline scheme. The Policy wording should be amended to: "future phases of the development shall be delivered in accordance with any approved masterplan".
- 2.4.3 Our Client has undertaken initial technical studies of the Site to understand its capacity for development. Submitted alongside our representations to the publication version of the Local Plan (see Appendix 5), our Client prepared a visioning document which set out a vision for how the site could be developed for housing.
- 2.4.4 Our Client considers that this vision remains a valid basis on which to develop the site and should provide the Council with some confidence that a high quality, well considered scheme, which broadly aligns to Policy requirements set out for the development of the Site, can be achieved without the need for an upfront formal masterplan.

3.5 Can development of the allocation be mitigated so that it would not lead to severe transport/highways impacts?

- 2.5.1 As set out in our Matter 1 and 3 Hearing Statements, our Client does not consider that highways constraints experienced within the Borough (or Poulton-le-Fylde) are as pronounced as outlined by the Council. As such there is a greater capacity for development in Poulton-le-Fylde then set out within the submission Local Plan.
- 2.5.2 As part of our Client's submission to the publication version of the Local Plan, a review was undertaken of the evidence of highways capacity in Poulton-le-Fylde and the implications of this on growth options for the town more generally (see Appendix 4). In summary, this review (again submitted for completeness) concluded the following:
- Little consideration is given to alternative approaches to meeting development needs whereby housing would be located in areas which are well served by services and amenities and public transport;
 - The Highways Desktop Assessment supporting the Local Plan considers sites identified in Poulton-le-Fylde as a collective rather than viewing sites on their merits such as their accessibility to existing services and the potential of each site to mitigate traffic flow; and

- As a result, the Highways Desktop Assessment makes generalised conclusions about accessibility of sites which increases the trips which are generated from the site.

2.5.2 As part of preliminary work to assess the suitability of Land South of Blackpool Road for housing, our Client has sought to understand highway capacity within the town and the potential impact of the development. This is provided within the Report titled "Blackpool Road, Poulton-le-Fylde Highways Assessment" published in July 2017, which is submitted alongside this Hearing Statement (see Appendix 6). The Assessment concludes the following:

- The proposed development of 460 dwellings at the Site is expected to result in changes to local junction flows at peak hours of between 0.2% and 6.8%;
- Owing to the location of the proposed development, the impact on the highways network is spread out, rather than being concentrated on any one location, meaning that the resulting impact is more modest;
- The Assessment concludes that some mitigation will be required to accommodate the development at a number of junctions on the local highway network. In most cases this is considered achievable;
- Highways England have programmed improvements being undertaken to the A585 as part of works through Road Investment Strategy 1. The preferred option for these works have recently been announced and is currently being consulted on with an application expected in the Autumn and start on site in 2019. The development of the Site therefore could be built out in accordance with these works; and
- There is scope for a package of sustainable transport measures to support access to and from the Site by non-car modes of transport.

2.5.3 The Highways Assessment also considers how the Site is to be accessed and movement within the Site. The Assessment outlines:

- The proposed access onto Blackpool Road from the Site can achieve the required visibility splays;
- A Priority controlled access, with dedicated right turning lane from Blackpool Road will be provided at the access and can be accommodated;
- A roundabout access is to be created at Tithebarn Street to provide access into the Site at the eastern boundary. This can be accommodated by diverting the highway into the Site. An access into Carleton Gate can be achieved at this roundabout;
- A spine road will link to the two access points and will be developed to a standard to accommodate service buses; and

- A Car Park will be created within the eastern part of the Site featuring 100 spaces to provide extra parking for Poulton-le-Fylde Town Centre. The development therefore supports the viability of the Town Centre and will reduce the potential for on-road parking within the centre as existing parks operate at or near capacity.

3.6 Are all the Key Development Considerations necessary and clear to the decision maker?

2.6.1 The Key Development Considerations listed within the policy are acknowledged by our Client. The Visioning Document prepared by our Client for the Site (submitted alongside this hearing statement) provides an initial view on how the site within our Client's control, could be developed. The vision for the Site provides the following:

- Capacity for 460 dwellings;
- Vehicular access from Blackpool Road and Tithebarn Street providing an alternative route through the site (potentially for public transport) avoiding the existing junction within Carleton to the north;
- The development will provide for a new car park (approximately 100 spaces) to serve Poulton-le-Fylde Town Centre;
- Areas within Flood Zone 2/3 will not be developed with this area forming a linear park;
- Areas of public open space will be delivered within the Site;
- Apart from required access routes, existing hedgerows and trees are to be retained and integrated into the development; and
- A noise buffer and landscaping area will be incorporated along the southern boundary of the site near to the railway line.

2.6.2 Scope for a primary school exists within the wider land parcel which is understood to be in the Council's ownership, thus simplifying its development, and enabling the wider area to be maximised for housing delivery.

2.6.3 There are some Key Development Considerations which need to be clarified:

- The Council should set out what response is required in relation to the existing public right of way. Is this to be maintained in its current position, or can this be diverted within the scheme to provide for added flexibility? What improvements if any are required to this public right way? and

- In relation to the railway line, it is unclear what relevance the electrification of this line has to the development of the Site (other its benefit to the Site's sustainability credentials).

Issue 4: Infrastructure

4.1 Will the infrastructure to support the scale of development proposed in the settlement be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

3.1.1 Our Client considers that the necessary infrastructure to support developments within Poulton-le-Fylde has been planned by the Council. In addition, Highways England planned improvements to the A585 are expected to relieve congestion not just on the strategic road network but also relieve local roads and that is due to start on site in 2019. Developments can be phased in their delivery to ensure that appropriate infrastructure is in place at the right time in order to ensure that there are no adverse effects for existing residents. This approach will be effective in securing delivery of this infrastructure but will also ensure that development is allowed to come forward in response to plan requirements and identified housing need.

Issue 5: Deliverability

5.1 Are the assumptions about the rate of delivery of houses from the allocations realistic.

4.1.1 Our Client can confirm the deliverability of Land at Blackpool Road, Poulton-le-Fylde in full within the Plan Period. The housing trajectory set out within the Housing Background Paper January 2018 outlines that the Site would commence delivery in 2020/21. Assuming that the Local Plan is adopted later this year/early 2019, and planning consent secured shortly following this, it is considered that this timescale is achievable.

4.1.2 As set out above, our Client considers that the Site should be modified to reflect the red-line boundary which is set out within the supporting visioning document. This area is considered suitable for housing and is under the option of our Client whom is an active housebuilder. This site area is considered to hold a capacity for 460 dwellings. Given the market area, and potential for two access routes into the Site our Client believes that an annual rate of 50 dwellings per year is achievable on site, with the Site being developed through two outlets. Our Client's revised trajectory which is set out in Table 2 overleaf.

Table 2: Land South of Blackpool Road, Poulton-le-Fylde Housing Trajectory

2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
0	0	25	50	50	50	50
2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
50	50	50	50	35	0	