



Statement to Local Plan Examination – Matter 4

Fylde Local Plan

for Wainhomes NW Ltd (ID 67)

Project : 15-415
: Fylde Local Plan
Examination
Client : Emery Planning
Partnership
Date : March 2017
Author : Stephen Harris

This report has been prepared for the client by Emery Planning with all reasonable skill, care and diligence.

No part of this document may be reproduced without the prior written approval of Emery Planning.

Emery Planning Partnership Limited trading as Emery Planning.

Contents:

1. Introduction	1
2. Matter 4 – Vision, Objectives and Development Strategy	1

1. Introduction

- 1.1 Emery Planning Partnership is instructed by Wainhomes NW Ltd (ID 67) to attend the Local Plan Examination. We have submitted representations on the Publication Draft as well as the Revised Preferred Option of the Fylde Local Plan (October 2015).
- 1.2 Our client's specific interests within Fylde are:
- land at Cropper Road West, Whitehills which is allocated (Policy HSS5) in the Plan for 442 dwellings.
 - Land to the west of Bryning Lane, Wrea Green. This site is an omission site.
- 1.3 Site specific matters are to be dealt with at Stage 2, therefore this statement is solely concerned with the Inspectors questions under Matter 4.

2. Matter 4 – Vision, Objectives and Development Strategy

Issue 8 Q28

- 2.1 Policy S1 sets out the proposed settlement hierarchy for the emerging local plan and comprises Key Service Centres, Local Service Centres, Larger Rural Settlements and Smaller Rural Settlements. Policy DLF1 then sets out the development locations. The Inspector asks whether locating 83.6% of the proposed development is justified, supported by robust evidence, achievable and clearly defined.
- 2.2 Our position is that the development strategy is appropriate with the majority of development being focused on the 4 Strategic Locations for Development. Particular support is made to the Fylde-Blackpool Periphery where development not only assists in meeting the needs of Fylde but also provides a close relationship to Blackpool and the M55. As to whether it is achievable will be determined under Matter 3.

Issue 8 Q29

- 2.3 Q29 asks whether Policy S1 is justified and does the evidence suggest that some settlements should be placed at different levels within the hierarchy.
- 2.4 Our representations at the Publication Stage were concerned with the designation given to Wrea Green in terms of the settlement hierarchy and that it should be defined as a Local

Service Centre. These concerns remain and our position is that Wrea Green should be a Local Service Centre. Notwithstanding where Wrea Green sits in the settlement hierarchy our position is that Wrea Green should be designated a greater level of development. This would be through the need for additional land to be required to meet the housing requirement in the Local Plan and to ensure a supply of housing land to ensure a 5 year supply. Please see our statement on Matters 2 and 3 on our position on housing need and the need for additional land to be allocated.

The Current Position

- 2.5 Wrea Green is identified as a Larger Rural Settlement through the Publication Local Plan. The next highest tier, Local Service Centres, are recognised as being well-placed to provide for future local housing and employment needs and this tier includes Freckleton, Warton and Wesham.
- 2.6 Overall, Wrea Green has been scored by the Council as the 7th most sustainable settlement within the Borough with a score of 21 which is just below that of Freckleton (23) and higher than that for Warton (18), both of which are identified as Local Service Centres.
- 2.7 The Appendix to the Settlement Hierarchy Background Paper (**ED.002**) shows how each settlement has been scored in relation to accessibility to bus services. Wrea Green was assessed at page 27 and the relevant table suggests that the settlement benefits from only one bus service (no. 76) with eight destinations, thereby providing a score of 9 points. However, the current position is that the village is served by the no. 61 bus service. This provides a half hourly service serving 9 destinations including Blackpool and Preston. Further services provide access to local secondary schools and Preston College.
- 2.8 The total bus accessibility score for Wrea Green should therefore be 11 and should have been given a score of 2 as set out in Table 2 of **ED.002**. In addition whilst this is an increase of 2 points, the bus service has materially improved in that the service is now half hourly and serves both Blackpool and Preston whereas in March 2016 it was an hourly service serving which did not go to Preston. The assessment in the evidence base does not recognise such improvements. Whilst we recognise the level of bus services fluctuate, in this area we understand that there are to be other significant improvements going forward to bus services as a result of recent permissions in the village as well as at Kirkham and Warton due to significant Section 106 contributions.

- 2.9 Therefore rather than applying points depending upon the number of destinations, regardless of the size and nature of those destinations, the scoring criteria should be weighted in order to recognise the importance of regular bus services to major centres such as Preston City Centre (e.g. no. 61 from Wrea Green) and what the quantity and quality of services are and will be going forward. Such an approach would serve an actual planning purpose in recognising the true accessibility of such settlements.
- 2.10 The other factors assessed in **ED.002**. Wrea Green benefits from services including a primary school, shops, a public house, a hotel, restaurants, post office, church and a large public open space within the centre of the settlement. We consider that the score for Wrea Green should increase to 22.
- 2.11 Whilst Wrea Green does not have a rail station, the closest railway station to the site is Moss Side, located around 2.6km from the site. It is located on the Blackpool South to Preston Line. Kirkham and Wesham station is some 3.3km by road or 9 minutes by bus. ED.002 states:
- “Kirkham and Wesham railway station has the most frequent train service in Fylde. Therefore, these settlements are given a score of ‘3’. Squires Gate, St Annes, Ansdell and Lytham, each with one service per hour, are given scores of ‘2’, in order to give weight to their accessibility to a train service. The other settlements are given a ‘0’ score, as they have no train services.*
- 2.12 Therefore due to Wrea Green's excellent proximity to the higher frequency services at Kirkham and Wesham station residents would be better served than settlements which have scored in ED.002 due to proximity to less frequent rail services.
- 2.13 Finally, it must also be recognised that Wrea Green is located only two miles away from Warton Aerodrome, a recognised major employment through the emerging local plan of national importance, and as discussed above it benefits from regular bus services to Preston City Centre, Kirkham and Blackpool. Kirkham is also located a very short distance to the north east which provides a range of services and facilities.

Scale of Development at Wrea Green

- 2.14 Paragraph 7.21 of the Plan states that the Council considers Tier 1: Larger Rural Settlements could accommodate between 100 and 150 homes over the plan period and Tier 2: Smaller Rural Settlements which could accommodate up to 50 homes over the plan period. However Policy SL5 allocates or identifies sites 249 dwellings in Wrea Green. These stark figures

demonstrate that Wrea Green has been accepted by both the Council and Inspectors in granting permissions on the suitability and sustainability of Wrea Green and these are based on planning judgements rather than an unevidenced figure in paragraph 7.21 on what a village could accommodate.

2.15 Therefore seeking to prevent further development in Wrea Green is not founded on any evidence and has been comprehensively addressed by Inspectors when approving development in Wrea Green. These decisions have also been taken in the recognition that Wrea Green is a sustainable location to meet the housing needs of the Fylde and the status of the village should recognise this.

Affordable Housing

2.16 The need for affordable housing is set out in the Fylde Coast Strategic Housing Market Assessment dated February 2014. This concluded that for Fylde, there is an annual need of 207 affordable homes over the next five years, which totals 1,035 affordable homes. From Government data¹, there were 37 affordable homes completed in 2015/16. For the 5 years previous to that the level of affordable completions were:

- 2010/11 – 130;
- 2011/12 – 120;
- 2012/13 – 44;
- 2013/14 – 55; and,
- 2014/15 – 62.

2.17 It is therefore clear that the annual need is not being met by a significant margin and new permissions are required.

2.18 There is no data for the affordable housing needs of each settlement. However in the Willow Drive appeal at Wrea Green paragraph 51 of the decision concluded:

“Clearly there is a need for affordable housing in the Borough and it would be unreasonable to expect those who have a need for such accommodation to wait (for an unknown period) until opportunities came up in other locations, on the basis that they are not truly ‘local’ to Wrea Green. Whilst the need for

¹ Table 1011C: Additional Affordable Housing Supply 2015-16; detailed breakdown by Local Authority

such housing may be greatest in the more urbanised parts of the Borough it is not a proper planning objective to seek to exclude, or to deny an opportunity to, anyone with a legitimate housing need if the development is acceptable on all other grounds. As discussed above, housing here can be provided on a sustainable basis".

2.19 Therefore there is a significant affordable housing and Wrea Green has been accepted to be a sustainable location to meet that need. By designating the village as a Local Service Centre it will assist in meeting this affordable housing need.

Conclusion

2.20 We consider that Wrea Green should be recognised as a Local Service Centre in order to reflect the number of committed housing sites and the wide range of services available within the settlement together with its excellent accessibility to principal centres such as Preston City Centre, Kirkham, Lytham, Blackpool and the Warton Aerodrome.