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FYLDE COUNCIL LOCAL PLAN 2011-2032

Examination Hearings Stage 2

Matter 6 – Policy GD1 and Policy GD2

Land at Syke Hall Farm, Church Road, Warton

June 2017



1.1. These submissions are made on behalf of Mr Michael James and they relate to an area of land at Syke Hall Farm, Church Road, Warton.

The area in question is shown as the red crossed hatched area on the plan attached as Appendix 1.

1.2. The area in question contains a semi-derelict farmhouse and numerous bases (concrete) of what are understood to have been agricultural buildings.

1.3. The plan at Appendix 1 also shows (pink shaded areas) the extent of a development site which was granted planning permission by the Secretary of State on appeal on 24 September 2015 for up to 360 dwellings – LPA ref: 13/0674 – PINS ref: APP/M2325/A/2217060.

1.4. The plan and key attached as Appendix 2 is an extract/screen shot from the submitted Fylde Council Local Plan (“the FCLP”) Proposals Map. It can be seen that the planning application site (13/0674) for the development of up to 360 dwellings has been identified as a housing allocation (HSS2) on the FCLP Proposals Map.

1.5. The main issue arising is the confused and confusing arrangement that is actually conveyed by the FCLP Proposals Map as drafted – with an inconsistency arising between the extent of the housing allocation HSS2, the settlement boundary and the Green Belt boundary. The matter is further confused in terms of how the Syke Hall Farm site is treated – our view is that it is not sound for the Syke Hall site to be excluded from the settlement (partly open countryside and partly Green Belt).

1.6. This note will consider the relevant policy matters affecting soundness and will address the specific matters, issues and questions raised by the Inspector. There is a cross-over between the questions and matters raised in respect of Policies GD1 and GD2 and these will be dealt with collectively.

MATTER 6 – POLICY GD1 – SETTLEMENT BOUNDARIES

26. Policy GD1 refers to development being focussed on previously developed land within and immediately abutting the existing settlements. Does this relate to allocated sites and if so are settlement boundaries drawn around them? Are the settlement boundaries around each settlement justified?

32. Paragraph 8.6 of the justification text states that no review of the Green Belt has been undertaken, but minor alterations of the Green Belt may be required to accommodate the boundaries of some site allocations or to amend minor anomalies. Paragraph 8.7 also refers to boundary changes. What are the details of these changes and are they consistent with paragraph 83 of the Framework which states that Green Belt boundaries should only be altered exceptionally?

- 1.7. The following comments are made in the context of both of the questions set out above. That is because it is logical and reasonable to consider settlement boundaries and related Green Belt boundaries collectively and consistently. Logically and from experience it would be usual to expect a Local Plan Proposals Map to be consistent in terms of the definition of settlement and Green Belt boundaries – the only exception being where safeguarded land is identified between a settlement boundary and the Green Belt boundary with the intention of meeting longer term development needs. That circumstance does not appear to arise in this case.
- 1.8. The Framework provides the policy context for the review of historic Green Belt boundaries (paragraph 83-85). The following aspects are relevant:
- Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan;
 - At that time, LPA's should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period;

- When defining boundaries, LPA's should not include land which it is unnecessary to keep permanently open;
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

1.9. Exceptional circumstances arise in this case due to the fundamentally changed physical, land use and planning policy context in this particular location as a result of the granting of planning 13/0674 and the allocation of site HSS2. This is not a general circumstance that arises elsewhere or recurrently – in that sense it is genuinely exceptional.

1.10. Furthermore, the effect and implications of the physical, land use and planning policy context that has emerged is unique in the Fylde context.

It would appear that the Council has arrived at the view that adjusting Green Belt boundaries to take account of allocations and/or to amend minor anomalies does provide the exceptional circumstances to justify minor Green Belt review. We agree that is a sensible and justified position to adopt. That said we are not convinced that the implications have been fully or properly understood insofar as they affect the Syke Hall site and adjoining areas.

1.11. We would suggest that exceptional circumstances arise also in considering the policy [interpretation] implications of the situation that exists currently. Attached at Appendix 3 are two aerial photographic images – (i) showing the Syke Hall site in context; and (ii) the same area indicating the Warton settlement boundary (grey line) and the Green Belt boundary (green line) as indicated on the submission FCLP Proposals Map.

It will be seen that the Green Belt boundary does not follow any distinct physical features that are readily recognisable in the vicinity of the Syke Hall site. Indeed, the Green Belt boundary follows an arbitrary alignment across fields and other areas.

1.12. We would suggest that there is a potential policy tension that will arise given that the settlement boundary and Green Belt boundary are not consistent. The identified settlements (and sites within them) are the focus for new development over the Plan

period whilst there is a presumption against inappropriate development within the defined Green Belt.

1.13. Other exceptional circumstances arise due to the location of the Syke Hall site and its relationship to the adjoining areas that are to be developed, i.e. allocation site HSS2. In the short to medium term the areas adjoining and containing the Syke Hall site are to be developed with up to 360 dwellings. The result is that the Syke Hall site will be physically, functionally and visually divorced from the adjacent countryside areas. In real terms the Syke Hall site will perform none of the recognised Green Belt purposes as set out at paragraph 80 of the Framework. In terms of paragraph 85 of the Framework the Green Belt boundary as currently defined will:

- Fail to ensure consistency with the Local Plan strategy for meeting requirements for sustainable development, i.e. it is inconsistent with allocation site HSS2 and the settlement boundary for Warton;
- Will include land which it is unnecessary to keep permanently open;
- Fails to use physical features that are readily recognisable and likely to be permanent.

1.14. These factors raise issues of soundness in terms of consistency with national policy and effectiveness. We would agree that the preparation of the FCLP is the appropriate opportunity to review localised adjustments to the Green Belt boundary at Warton to reflect the fundamentally changed local circumstances arising from committed development proposals. In our view those circumstances are exceptional and in considering minor localised adjustments it is correct to follow the policy and guidance provided by the Framework in considering long term defensible Green Belt boundaries. This represents sound planning which is consistent with and supported by the relevant aspects of the Framework.

- 1.15. In order to address these issues we respectfully suggest an amended Green Belt/settlement boundary as is indicated on the aerial image at Appendix 4. (Settlement boundary – grey; Green Belt – green cross-hatched).