



Gladman Developments Ltd

Fylde Local Plan EiP

Matter 6 – General Development

Issue 9 – Does the Plan provide a robust framework for the management and delivery of development across the Borough that is justified, effective and consistent with national policy?

Policy GD1 – Settlement boundaries

26. Policy GD1 refers to development being focused 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 boundaries around each settlement justified?

1. Gladman object to the use of settlement boundaries as currently proposed as these would act to preclude the delivery of sustainable development opportunities beyond an artificial limit. The Framework is clear that development which is sustainable should go ahead without delay, in accordance with the presumption in favour of sustainable development. An overly restrictive approach to development beyond the settlement boundary results in a plan that is not positively prepared or effective.
2. Indeed, Policy GD1 focuses development on previously developed land (PDL) within and immediately abutting the existing settlements. Firstly, this does not accord with the requirements of the Framework which seeks to 'encourage' development on PDL, it does not seek to 'focus' delivery on PDL. Furthermore, Policy GD1 provides guidance on how development proposals on greenfield sites within settlement boundaries will be assessed. It is noted that the settlement boundaries are tightly drawn around the existing settlements limiting the amount of sustainable opportunities that are likely to come forward on greenfield land within settlement boundaries.
3. Notwithstanding the comments above, if the principle of PDL adjacent to a settlement boundary would be considered appropriate, Gladman would question why no consideration has been given to the delivery of sustainable greenfield sites beyond this artificial limit. Such an approach would unnecessarily restrict the ability to bring forward otherwise sustainable greenfield sites on the edge

of the borough's existing settlements, a restrictive situation that is likely to endure over the duration of Local Plan period.

4. In allocating development to meet identified housing needs, there may be a point where an allocation fails, or cannot come forward at the scale or timescales originally envisaged. In addition, the Plan should include a commitment relating to the potential unmet needs of Wyre to meet the housing market area's housing needs in full. In these circumstances it may be necessary to identify a sustainable location not previously identified for allocation, outside of the settlement boundary, to allow development to come forward and meet housing needs.
5. The borough's towns and villages are popular and attractive places to live for people of all ages and backgrounds. Consequently, there is a ready market for new housing to meet identified housing needs. Greenfield sites that are well related to existing settlements are sustainable and relatively cost effective locations for new growth. This combination of circumstances provides a positive context for efficient, effective and timely housing delivery.
6. The only consideration of any housing development beyond the settlement boundary solely relates to development in the countryside for uses associated with agricultural, replacement dwellings etc. Such an approach does not allow for flexibility to consider sustainable opportunities that could assist in meeting the authority's full OAN, or the ability of the Council to demonstrate a 5 year housing land supply. Gladman believe therefore that the policy as currently proposed is unsound.

28. The policy refers to 'settlement development targets'. Is this appropriate and consistent with national policy?

7. Gladman do not consider the use of 'settlement development targets' within the policy wording to be consistent with the requirements of national policy. Such wording may imply that once a development target has been reached that no additional housing is required or will be necessary to meet identified housing needs.
8. Notwithstanding the comments on OAN raised throughout the examination and the need for the Plan to align with the upper end of the OAN range, Gladman supported the principle of the housing target being seen as a 'minimum' requirement. Gladman maintain that the housing figure proposed must be considered as a minima rather than a 'ceiling' or 'target' for development and a 'minimum' requirement should be applicable to all settlement tiers.