

# **INDEPENDENT EXAMINATION OF THE FYLDE COUNCIL LOCAL PLAN**

## **INSPECTOR'S MATTERS, ISSUES AND QUESTIONS RESPONSE (Stage 2 Hearing Sessions)**

### **MATTER 7 - The Economy - Site Allocations and Delivery**

1<sup>st</sup> June 2017

PWA\_15-123\_M7

## 1. INTRODUCTION

- 1.1. PWA is retained by The Rigby Organisation (RO) in respect of a number of sites across Fylde Borough, including land south west of Junction 3 of the M55, Corner Hall Farm. On behalf of RO additional employment land allocations are sought close to M55 Junction 3.
- 1.2. The statement responds to selected questions set out within Matter 7 of the Inspector’s Matters, Issues and Questions. The responses should be read together with the comments previously provided on the submissions version of the Local Plan and PWA’s hearing statements submitted to Stage 1.
- 1.3. This statement is intended to follow the format provided by the Inspector in her MIQs document dated 15<sup>th</sup> May 2017.

## Matter 7 – The Economy- Site Allocations and Delivery

*Issue 10 – Does the Plan set out a positively prepared strategy for the delivery of economic development (Employment, Retail Centres, Leisure Culture and Tourism Development) within Fylde that is justified, effective and consistent with national policy?*

### Site Allocations – Policies SL1-SL4 and EC1

Q48. Are these policies up-to-date with regards to the allocation of employment sites? Is there justification for the allocation of any other sites (such as land SW of junction 3 of the M55, Corner Hall Farm)?

- 1.4. As made clear in our previous submissions, we do not object to the identified requirement for employment land within the Local Plan, which we believe to be consistent with one of the scenarios examined in the Employment Land and Premises Study in 2012 (ED041a) ('the study'). However, it should be noted that increased economic growth was reflected in the take-ups in the more recent five years of the study, in contrast to the longer history which identified 2.7 ha per annum of employment land supply. The more recent five years of the study would suggest an employment land take-up figure nearer to 3 ha per annum should be anticipated. The impact of this across the plan period would suggest an additional 5.88 ha of employment land ought to be planned for. Furthermore, as discussed in subsequent sections, the constraints to delivery some of the larger employment allocations, particularly in terms of infrastructure improvements, does cast considerable doubt on the ability of these sites to meet employment needs, especially in the shorter term. These matters, coupled with our previous comments in respect of the spatial distribution of new employment allocations, which we consider to be inappropriate and unlikely to fully meet the needs of the Borough, form the basis and justification of our request that other sites be brought forward.
- 1.5. Of the total 62 hectares of new employment land allocations, some 49.5 hectares (**82.5%**) is located in the "Fylde / Blackpool periphery Strategic Location". Even accounting for the expected delivery of some of the requirements for Blackpool within the Fylde Borough, this scale of development concentrated within one geographical area is considered to be inappropriate and will leave a considerable spatial imbalance in employment land provision.
- 1.6. The Fylde Employment Land and Premises Study identifies other broad locations, particularly those which can take advantage of the proximity of the motorway network and which would support growth in the heart of the Borough and would hence address this imbalance. Paragraph 6.23 of the study states that almost three-quarters of the [existing] land supply is located on the western edge of the Borough, in close proximity to Blackpool. This is echoed in Paragraph 6.40, which notes that land supply is dominated by provision in the west of the Borough, especially at Whitehills Park, close to the M55 motorway and Blackpool. Whilst this location might be attractive to new investors to the Borough, the relative distance and poor connectivity at present make it less suited to Fylde's indigenous companies. In this respect, there is almost no supply in Kirkham, while sites in St Annes and Lytham are either constrained or are subject to development pressures for alternative uses. In this respect, the study identifies a need for additional employment land supply and discusses various locations to be considered; including three sites near Kirkham and Wesham.

- 1.7. Notably, Greenhalgh at Junction 3 (east of Corner Hall Farm and the A585), was considered. It is noted that Junction 3 provides an important highways-based node for the Fylde Coast sub region, providing key connections into both Fylde and Wyre Boroughs. There is also some employment based activity in the vicinity of the junction, represented by Universal Products and Premier Inn. Paragraph 11.34 states that the location is likely to prove attractive to the marketplace with some of the Borough’s businesses having indicated it is a location they would be attracted towards.
- 1.8. The study concludes that potential allocations around Kirkham and Wesham will be more complex as they require development of a new greenfield employment area ‘from scratch’. The environmental and access issues will be considerable and occupier demand at these specific locations needs to be established. However, a Kirkham and/or Wesham allocation is likely to be the main opportunity to provide a large employment site away from Junction 4, M55 that would directly benefit residents in central and eastern Fylde. These sites are considered sustainable in terms of accessibility, public transport and viability. The partly complete Mill Farm Sports Village development (allocation MUS3) has effectively contributed to this supply, albeit in terms of traditional employment, only to a relatively modest extent of circa 1.1 ha.
- 1.9. In respect of Corner Hall Farm, whilst located to the north of Wesham, the site is now considered to be more sustainably located than in the 2012 study, being relatively close to one of the principal settlements in the Borough and the largest inland settlement within Fylde. It is also close to Junction 3 of the M55, which allows ready access to the strategic highway network, including from the A585 and M55. The site is currently bounded by the M55 to the north, A585 to the east with agricultural land to the west and south. Within the site is the agricultural holding of Corner Hall Farm, it also encompasses the existing hotel. The utilisation of the site for employment and commercial uses (high-tech business development) or specialist retail uses would have a particularly positive impact on the area and in terms of meeting the employment development needs of the Borough and this part of the Fylde in particular, as well as helping to achieve sustainable development. Whilst public transport options to the site are available they are currently quite limited, though it is anticipated that this could be improved through a suitable legal agreement, not dissimilar to the requirements sought through the Mill Farm location, also located on the A585 approximately 600m south of Corner Hall Farm.
- 1.10. Supplementing this Paragraph 7.68 of the study states that the allocation of some sustainable employment sites on the edge of settlements is necessary as there is limited capacity within the existing settlements for new employment development. The research identified eight possible broad areas of search where additional future employment land allocations might be delivered. Part of the considerations have been around Junction 3 of the motorway and along the A585, factors which this site could capitalize upon. The report recognises that such development would directly benefit residents in central and eastern Fylde. It recognises that it is important that the Borough has a balanced portfolio of employment land allocations, not just by type and size, but also spatially in relation to its settlement pattern, again something with Corner Hall Farm could deliver.
- 1.11. The site would comprise a suitable area of land with excellent road access to the strategic road network and would be very desirable to commercial and other employment end users. The site also represents a logical extension of approved and existing commercial developments north of Wesham and west of A585.

1.12. It is clear that this area, encompassing the site at Corner Hall Farm would make an important contribution to the deliverability of the Fylde Local Plan. The allocation of Mill Farm to the south of Corner Hall Farm adds merit to this argument. With this allocation now largely built out, it has changed the dynamics of the area, and arguably enabled the Corner Hall Farm site to be located more sustainably, and should now be looked upon more favourably than as previously identified in the 2012 study.

Q49. Is Policy EC1 allocating sites and if so should it state this? Does the policy duplicate allocations set out in Policies SL1-SL4?

1.13. No comments to make.

Q50. Is the methodology for site assessment and selection robust and justified?

1.14. The methodology for the identification of land supply can be largely supported, it makes clear that a minimum amount of 60.6ha of Employment Land is required, however, as stated above there is an argument for further land being required based on the more recent five years of the study period.

1.15. The revised 2016 Site Assessment Paper (ED004) sets out the assessment of the strategic and non-strategic development sites for inclusion in the Publication version, 2016 and previously in the Revised Preferred Option (RPO) version, 2015 of the emerging Fylde Local Plan. In doing this it includes tables for strategic and non-strategic locations and respective site allocations. Whilst these provide broad topics for each allocation, detail is lacking in terms of matters relating to deliverability. Pertinent to employment is the reliance on the deliverability of road infrastructure commonly in relation to the M55 and Junction 4. Whilst it is clear these items will need to be delivered to enable development to commence, and as such to deliver the aspirations of the Local Plan, it is not clear as to when the Council expects these allocations to come forward. It is noted that the Local Plan does not set out phasing for employment sites, but if the Local Plan is deliver on the scenario set out in the 2012 study then clearly there should be some confidence in infrastructure being delivered in a timely manner to allow the 2.7 ha of land per annum to be bought forward.

1.16. Clearly, as identified above and as part of our continued argument for promoting Corner Hall Farm, there is a reliance on delivering employment land on the western periphery of Fylde in this location, and therefore such matters are considered important in ensuring the employment aspirations of the plan can be delivered. In this respect, sites such as Corner Hall Farm could be delivered in the short term helping the continued growth sought by the plan and historical employment land uptakes, in a central location to the borough where demand exists and housing allocations are being delivered, filling the voids likely to be left in the early part of the plan given these unknown timescales.

1.17. Finally, the Site Assessment Paper places a reliance on identification of sites from the 2012 study. As demonstrated above for Corner Hall Farm, during the past 5 years the dynamics of the area have changed through new development coming forward in the absence of the Council’s Local Plan (i.e. Mill Farm). An update in this respect should be considered in relation to the sites listed within the Site Assessment Paper as scorings of proposed and rejected sites are likely to have changed. The Site Scoring System (ED041g), an appendix to the 2012 study, sets out clear criteria for considering sites against. There is a strong focus within this on proximity to motorways and prominence, along with sites with few constraints to deliverability. Corner Hall Farm would score well against such

criterion, similarly to how sites at Whitehill have scored, and to some degree better without the reliance of transport infrastructure outside of the control of the development proposed.

Q51. Are the proposed site allocations justified and deliverable? Is there justification for some sites to be removed from the policies (such as ES1)?

1.18. As stated throughout this hearing statement, there is a clear reliance in the allocations put forward in relation to transport infrastructure being delivered in a timely manner to allow employment land to come forward. Similarly, there is also a strong reliance and focus of development towards Junction 4 of the M55. This creates an increasing reliance on development coming forward in this area, and as such, the transport infrastructure required being delivered in a timely manner. Whilst the Infrastructure Deliver Plan (SD003) makes clear that the link road is anticipated to be completed by 2019, there are other improvements needed not identified with timescales. Of the 11 allocations proposed by Policy EC1, 5 are dependent on improvements to Junction 4 of the M55 (ES4, ES6, ES7, MUS1 and MUS2). The spatial focus of proposed allocations in this area is a risk to the delivery of the economic aspirations of the plan.

1.19. Again, as previously identified, there is a reliance on an identification of sites listed in the 2012 study. In this five year timescale, the economic landscape has changed and some sites are now better located than other have been previously identified. The reliance on identification within the study should not be the only justification for inclusion as an allocation within the Local Plan. A simple example is Policy ES1, which in both the 2015 and 2016 site assessment papers is listed as currently for sale and its delivery timescales to be confirmed. In this respect it raises questions as to whether the site will deliver the required employment land needed. A review of the sites in light of the spatial distribution and changed landscape of development in the area should be considered, to ensure employment sites are brought forward in a timely manner, in the right location to deliver sustainable development and the aspirations of the Local Plan.

Q52. Policy EC1 lists appropriate use classes for each site – are these justified and effective? Is there justification for some sites to be allocated for other uses (such as sites MUS2, ES4, ES5, ES6)? What is the purpose of including the term ‘where, unacceptable harm is not caused, the following uses will be permitted...’ when appropriate uses are already listed within this policy?

1.20. No comments to make.

Q53. Where Policy EC1 refers to the alternative uses for allocated and existing sites should cross reference be made to other Plan policies such as Policies GD7 and GD8?

1.21. No comments to make.

Q54. Is it effective to list existing employment sites in Policy EC1? Is the list justified, based on up-to-date evidence and in accordance with Paragraph 22 of the Framework? Are all sites still active employment sites or is there justification for some sites to be removed from the list (such as Mythop Lodge)? Is the list consistent with Appendix 6 as referred to in paragraph 9.17?

1.22. No further comments to make.

Q55 to Q61

1.23. No further comments to make.