

## Fylde Local Plan Examination

### Matter 7

#### The Economy – Site

#### Allocations and

#### Delivery

## Hearing Statement

On behalf of Oyston Estates

## 1.0 INTRODUCTION

- 1.1 Cassidy + Ashton are retained by Oyston Estates [OE] in respect to a number of sites within Fylde Borough including Whyndyke Garden Village, the largest development site within the Borough.
- 1.2 In respect to the Local Plan, OE are promoting the allocation of additional land at Lytham St Annes, the identified most sustainable settlement within the Borough.
- 1.3 Comments made should be read in conjunction with our previous submissions to the Local Plan process, in particular in respect to the Submission Version of the Local Plan.
- 1.4 The format of this statement follows the Inspector's own Matters Issues and Questions 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?**

OE has no comments to make on this matter.

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

26. **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)?**

OE has no comments to make on this issue.

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

OE has no comments to make on this matter.

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

OE has no comments to make on this matter.

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

OE has no comments to make on this matter.

**30. 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 the policy?**

OE has no comments to make on this matter.

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

OE has no comments to make on this matter.

32. 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?

OE has no comments to make on this matter.

#### **Policy EC2 – Employment Opportunities**

33. Is there justification for other economic development uses as defined in the Framework, to be supported in this policy? Would this be consistent with national policy?

It is noted that the Glossary to the NPPF defines Economic Development as:

*“Development, including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development).”*

For consistency, it is clear that the plan should allude to all forms of Economic Development in respect of their potential for job creation and the contribution this could make to the Fylde economy.

#### **Policies EC4 and T3 – Blackpool Airport Enterprise Zone**

34. Do the policies support delivery of the objectives and purposes of the Enterprise Zone designation and the long term operation of the airport? Would the relocation of the aviation functions closer to the runway and within the Green Belt be justified? Is the inclusion of ‘enabling development’ appropriate and justified?

OE has no comments to make on this matter.

#### **Policy EC5 – Retail Centres**

35. **Paragraphs 9.38-9.51 of the Plan set out the findings of the Retail Study (2011) and the Update (2013). These include additional requirements for comparison and convenience floorspace during the Plan period. Does Policy EC5 clearly set out where and when this will be provided?**

Policy EC5 seeks to distribute new retail development to identified centres but does not identify sufficient land to do so. Sufficient land should be identified or a criteria based policy put into place for the consideration of alternative sites.

On a separate matter, the policy refers to Whyndyke being a local centre but does not include it in the core list at the start of Policy EC5. This should be corrected.

36. **Are the centre boundaries and primary and secondary shopping frontages justified and consistent with national policy?**

OE has no comments to make on this matter.

37. **Paragraph 9.54 sets out a local threshold of 750sqm at which an impact assessment for retail, leisure and office development outside town centres will be required. Is this threshold justified and based on robust evidence? Can the Council clarify why it is in the supporting text and not set out in the policy?**

There would appear to be no clear justification for the figure of 750m<sup>2</sup> above which an impact assessment is required. This figure is substantially lower than the standard approach set out in the NPPF, being 2,500m<sup>2</sup>, and significantly lower than figures applied elsewhere in other local authority areas including those adjoining Fylde.

#### **Policies EC6 and EC7 – Leisure, Culture and Tourism Development**

**38. In relation to Policy EC6:**

- a. **Should the policy safeguard the potential impact of leisure, culture and tourism development on the operational requirements and communication systems of the Warton Aerodrome? Is this justified?**

OE has no comments to make on this matter.

b. **Does the policy clearly define leisure, culture and tourism uses?**

OE has no comments to make on this matter.

c. **Should the policy support large scale rural tourism at appropriate sites? Is this justified and consistent with national policy? Does the policy accord with Policy GD5 in this regard?**

OE has no comments to make on this matter.

**39. In relation to Policy EC7:**

- a. **Are the Holiday Areas justified and based on robust evidence?**

OE has no comments to make on this matter.

- b. **Is the retention of holiday caravan pitches for holiday use justified? Should the policy include reference to alternative uses if the existing use was to become unviable? Would this be justified?**

OE has no comments to make on this matter.

# Cassidy + Ashton

## Chester Office:

10 Hunters Walk, Canal Street,  
Chester, CH1 4EB

T: +44(0)1244 402 900

E: chester@cassidyashton.co.uk

## Preston Office:

7 East Cliff, Preston,  
Lancashire, PR1 3JE

T: +44(0)1772 258 356

E: preston@cassidyashton.co.uk

## Email us:

[architecture@cassidyashton.co.uk](mailto:architecture@cassidyashton.co.uk)

[surveying@cassidyashton.co.uk](mailto:surveying@cassidyashton.co.uk)

[planning@cassidyashton.co.uk](mailto:planning@cassidyashton.co.uk)



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