

Barton Willmore on behalf of Story Homes Ltd
Examination into the Fylde Council Local Plan to 2032
Matter 8
Representation ID: 058

Matter 8 – The Environment

1. The following Hearing Statement is made for and on behalf of Story Homes. This Statement responds to selected questions set out within Matter 8 of the Inspector's *Matters, Issues and Question*.
2. The following responses should be read in conjunction with our comments to the Publication Version of the Local Plan, dated September 2016. We have also expressed a desire to attend the Examination Hearing Sessions in relation to this Matter.

Issue – Does the Plan set out a positively prepared strategy for the preservation and enhancement of the environment (natural, built and historic); the management of water and flood risk; and the promotion of renewable and low carbon energy generation within Fylde that is justified, effective and consistent with national policy?

Policies ENV1 – ENV2 – Landscape and Biodiversity

62. Are policies ENV1 and ENV2 consistent with paragraphs 113 and 114 of the Framework?

3. Policies ENV1 and ENV2 each set out criteria against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be assessed.
4. We would request that that the wording of part (b) is revised to accurately reflect the NPPF. Paragraph 17 states that the intrinsic character and beauty of the countryside should be 'recognised'; whereas paragraph 109 states that only valued landscapes need to be 'protected and enhanced'. The phrase 'existing landscapes' should therefore, be amended to 'valued landscapes'.
5. Policy ENV2 also plans positively for the creation and protection and enhancement of biodiversity and geodiversity. Policy ENV1 also seeks to protect the character and landscape of undeveloped coast. The policies are therefore consistent with paragraph 114 of the NPPF.

Policy ENV3 – Existing Open Space

Questions. 64 - 66

6. Story Homes has no comments to make in response to these questions.

Policy ENV4 – New Open Space

67. The policy includes minimum standards for the provision of amenity open space. Are these justified and based on robust and up-to-date evidence?

7. As part of our representation to the Publication Draft Local Plan consultation, Story Homes objected to Policy ENV4 on the basis the minimum standards were based on an open space study that was out-of-date. As stated in paragraph 14.42 of the Plan, the Council updated their Open Space Study¹ in 2016, in line with the requirements of paragraph 73 of the NPPF which is welcomed.
8. Notwithstanding this, it is unclear from the supporting text what impact this Study has had on the minimum standards as they remain the same as the standards required in the previous Publication Draft. The Council has provided no justification for the requirements remaining the same. The Council therefore need to clarify how these requirements have been derived to prove they are justified and based on up-to-date evidence.

68. Sites of 100 houses or more are required to provide double the minimum standards. Is this justified and based on credible up-to-date evidence? Has the impact on the viability of development been taken into consideration?

9. There is no evidence to justify the requirement for sites of 100 houses or more to provide double the minimum standards and no evidence that the threshold of 100 dwellings has been tested against any alternatives. There has also been no design capacity work undertaken by the Council to justify that this requirement would even be achievable on sites of more than 100 dwellings.
10. In terms of viability, Section 6 of the Economic Viability Assessment² considers specific viability testing for residential development. Paragraph 6.2 of the document states that policies relating to the provision of onsite open space have been taken into account when

¹ Document Ref: ED059

² Document Ref: ED016a

testing the viability of different types of development. However, it is not clear from the Assessment whether the standards have been doubled for sites of 100 dwelling or more.

11. The Council produced a subsequent Viability Assessment³ as part of the Publication Draft Local Plan consultation. This considered additional technical standards, density and mix, affordable housing and site allocations in isolation. However, as stated in paragraph 2.5 no further testing was done in relation to open space requirements. As the testing for components has been done separately it is unclear whether, in combination with other requirements the open space requirement to be doubled for 100 dwellings is viable. The Council should seek to test all of the components within one Assessment rather than separately.
12. In summary, this requirement is therefore wholly unjustified and is not based on up-to-date evidence.

³ Document Ref: SD006