

EiP Statement

Fylde Council Local Plan

Our ref 41917/02/MW/KH
Date 13 March 2017
To Programme Officer
From Lichfields

Subject Matter 4 – Vision, objectives and development strategy

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [Taylor Wimpey] to make representations on its behalf to the Fylde Council Local Plan [FCLP].
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 4 Examination in Public [EiP] hearing sessions.
- 1.3 Separate representations have been submitted in respect of the following Matters:
- 1 Matter 1 – Compliance with statutory procedures and legal matters
 - 2 Matter 2 – Objectively assessed housing and economic development needs
 - 3 Matter 3 – Housing and employment requirements
- 1.4 The representations should be read in conjunction with previous submissions on the FCLP [Representor ID: 60] as well as those made on other Matters listed above.
- 1.5 Taylor Wimpey is seeking to bring forward a high quality residential extension on land at Weeton Road, Wesham. This would assist in the delivery of sustainable development within the Borough by making a significant contribution towards meeting the need for market and affordable housing.
- 1.6 This statement expands upon Taylor Wimpey’s previous representations in light of the Inspector’s issues and questions. Where relevant, the comments made are assessed against the tests of soundness established by the National Planning Policy Framework [the Framework] and the National Planning Practice Guidance [Practice Guidance].

2.0 Planning Issues

Issue 7 – Have the vision and strategic objectives within the Plan been positively prepared; are they justified and consistent with national policy and can they realistically be achieved?

26. Does the Plan set out a positive vision for the future development of the area? Are the changes proposed to the vision by the Council as additional (minor) modifications necessary for reasons of soundness?

- 2.1 Chapter 3 of the FCLP sets out a vision for Fylde over the period to 2032. Whilst it is agreed that overall, this is a positive and locally distinctive statement which reflects the twelve core land-use

planning principles of the Framework [§17], Taylor Wimpey is concerned that its aspirations in relation to the delivery of housing are unrealistic.

- 2.2 The Council's vision is that *"Fylde will have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of sustainable homes and economic growth within the four Strategic Locations for Development"* [FCLP page 26]. However, as set out in its response to Matters 2 and 3, Taylor Wimpey considers that the housing requirement of 370 dpa over the plan period will not meet the full, objectively assessed needs of the area. This is contrary to the requirements of the Framework [§14, §47 and §182] and Practice Guidance [ID: 12-002-20140306].
- 2.3 The implication of constraining housing delivery is that the FCLP will fail to achieve its vision and objectives, including the need to deliver sustainable growth and support a diverse and prosperous economy. It is also noted that the vision for Fylde refers to the development of *"closer working relationships with the adjoining Fylde Coast Authorities"*. Taylor Wimpey question whether this is truly likely to occur, as the Council has so far chosen to ignore Wyre Council's request for assistance and is failing to address the housing shortfall from elsewhere in the HMA. It is therefore considered that the vision is not positively prepared and will not be effective.
- 2.4 The Council's proposed changes to the vision relate to the proposed energy logistics park within Blackpool Airport Enterprise Zone and improvements to Junction 4 of the M55. Taylor Wimpey does not have any comment on these modifications.

27. Have the strategic objectives within the Plan been positively prepared and are they suitably framed? Does the addition of a further objective to strategic objective 3 as proposed by the Council as an additional (minor) modification have any implications for other parts of the Plan? Is this change necessary for reasons of soundness?

- 2.5 Taylor Wimpey considers that the five strategic objectives set out within the FCLP are suitably framed to assist in the delivery of the Council's strategic aspirations. However, Taylor Wimpey is concerned that 'Strategic Objective 1: To Create Sustainable Communities' in particular is not effective. This is because the Council has produced an unsound housing requirement figure of 370 dpa that is not based on its own housing evidence and there is not a supply of specific deliverable sites to meet the housing requirement for five years from the point of adoption. It cannot therefore be said that the strategic objectives have been positively prepared.
- 2.6 The addition to strategic objective 3 specifies that the Council will seek to resolve congestion and capacity issues on Junction 4 of the M55 that will exacerbated by development over the plan period. Taylor Wimpey does not have any comment on this proposed modification.

Issue 8 – Does the overarching development strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development within the Borough?

28. The Plan states that the development strategy locates 83.6% of housing developments within the four strategic locations over the Plan period and 9.7% in non-strategic locations.

a. Is this strategy and the distribution of development within the Plan period justified? Are the strategic and non-strategic locations soundly based and supported by robust evidence?

- 2.7 Taylor Wimpey agree that it is appropriate to direct the majority of housing development to strategic locations, including Kirkham and Wesham, where there is good access to services and facilities.
- 2.8 In relation to the strategic locations, Taylor Wimpey considers that a greater proportion of development should be directed to Kirkham and Wesham as one of the most sustainable locations in the Borough. It is noted that Table 2: Distribution of Development states that across the plan period, 998 homes (12.6% of the total supply) will come from allowances and unallocated sites. This allowance is comparable to the share of development apportioned to the Kirkham and Wesham Strategic Location (14.5%). Such an approach does not promote sustainable patterns of development as required by the Framework, and therefore conflicts with national guidance. Taylor Wimpey therefore considers that the proportion of housing proposed in the Kirkham and Wesham Strategic Location should be increased, with a commensurate reduction in the allowance made for non-allocated sites and windfalls.

b. Will the development strategy achieve the Council’s vision and strategic objectives and deliver sustainable development for Fylde?

- 2.9 Whilst the Council’s approach to its development strategy is generally appropriate, Taylor Wimpey questions whether it will deliver sustainable development that meets local needs and national priorities.
- 2.10 Taylor Wimpey has raised a number of concerns with the methodology used to arrive at the Borough’s OAHN and its housing land supply position which are detailed in its response to Matter 2 and 3. These issues are not reiterated here, but Taylor Wimpey would highlight that the Council has not demonstrated an adequate short and longer-term housing supply which is a requirement of national guidance. In order to produce a sound plan and deliver sustainable development, the Council should allocate additional land to meet the housing needs of the community and these sites should be able to deliver early in the plan period.

c. Is the development strategy clearly defined within the Plan? Does Policy DLF1 clearly set out the distribution of development?

- 2.11 The introductory sections of the development strategy refer to the Borough as being part of the Fylde Coast sub-region, highlighting its links with Blackpool, Wyre and Preston. In particular, it specifies that “*As part of the Duty to Cooperate, strategic planning with these authorities will be maintained and the strategic policies in the Local Plan will reflect the fact that people and services cross council boundaries*” [FCLP §6.1]. As set out in full detail in its response to Matter

1, Taylor Wimpey is concerned that this position is not substantiated by an agreed mechanism for the delivery of unmet housing needs within the HMA. This element of the development strategy is therefore not effective or justified.

2.12 Whilst Taylor Wimpey agrees that Policy DLF1 clearly sets out the distribution of the development in the Borough, it considers that the proportion of housing proposed at Kirkham and Wesham should be increased. This is referred to in greater detail above in its response to Question 28a. More fundamentally, Taylor Wimpey is concerned that the provision of just 7,768 dwellings over the plan period is not a soundly-based figure. Work undertaken by Lichfields concludes that Fylde Borough's housing OAHN should be at least **450 dpa**, with the potential for this to be even higher once the latest household projections and migration datasets are modelled. It is therefore necessary the FCLP's housing policies to be updated to reflect the full objectively assessed need for housing. This has a consequent impact on Policy DLF1 and the figures presented in 'Table 2: Distribution of Development to 2032' and means that the total housing numbers for each of the Strategic and Non-Strategic Locations will need to be revised as they are predicated on an understated overall housing requirement.

29. Is the settlement hierarchy set out in Policy S1 justified? Does the evidence suggest that some settlements should be placed at different levels within the hierarchy? If so, what implications would this have, if any, on the development strategy?

2.13 The principles for future development set out in Policy S1 with regards to identifying a hierarchy of Key Service Centres, Local Service Centres, Larger Rural Settlements and Smaller Rural Settlements is generally supported. Given the geography and spread of settlements within the Borough, the identification of such a hierarchy is appropriate for the area and the correct way in which to identify the distribution of future development.

2.14 Kirkham is rightly designated within the FCLP as a Key Service Centre. This reflects its connectivity to the surrounding area and the range of housing, employment, retail, leisure, community, health and education facilities available. These sustainability credentials mean that it is suitable to accommodate additional development and growth.

2.15 Taylor Wimpey disagrees with the Council's approach of designating Wesham as a Local Service Centre within the Settlement Hierarchy. This is inconsistent with the Settlement Boundaries shown on the FCLP Policies Map (Policy GD1) which identifies Kirkham and Wesham as a single area; it is not separated by development limits. It is also noted that the employment, retail, transport and community facilities within this central part of the Borough serve both Kirkham and Wesham, as well as the surrounding rural area.

2.16 The identification of Wesham as a Local Service Centre also conflicts with the designation of Kirkham and Wesham as a Strategic Location. The Council clearly considers that the area as a whole is a sustainable location for development and does not differentiate between the two settlements in apportioning housing growth over the plan period (14.5% overall). It is therefore illogical to designate the settlements within different tiers of the Settlement Hierarchy. In order for FCLP to be effective, Kirkham and Wesham together should be identified as a Key Service Centre.

2.17 As set out previously, Taylor Wimpey has submitted separate responses to Matter 2 and 3 which sets out its concerns in relation to the Council's housing requirement and housing supply. It concludes that the Council is not providing sufficient land to meet the housing needs of the Borough and further sites should be allocated for housing development as part of the FCLP. The

FCLP is therefore not soundly based and it is requested that the calculation of Borough's OAHN is revisited, and that land at Weeton Road, Wesham is allocated for residential development in order to meet these full objectively assessed needs.

2.18 The allocation of land at Weeton Road, Wesham would assist in the delivery of sustainable development within the Borough. It would also deliver economic, social and environmental gains in accordance with the Framework. In summary:

- 1 The site would make a significant contribution to the housing land supply including affordable housing in the area. This is particularly important when considered in the context of the current lack of a Framework compliant 5-year housing supply.
- 2 The site is in a sustainable and accessible location which has the potential to encourage future residents to travel by sustainable modes of transport, including walking and cycling.
- 3 There are no insurmountable constraints to the site or its development and is deliverable within the next five years.
- 4 The site would deliver significant economic benefits through both direct and indirect employment opportunities during the construction phase.
- 5 The site is capable of delivering a high quality residential development which will complement the wider area.
- 6 The site is under the control of Taylor Wimpey who can deliver the proposed residential scheme.
- 7 The site benefits from being within walking distance of a number of services and facilities such as schools, shops, medical facilities and recreation opportunities which can contribute to the well-being and health of the community.
- 8 The site has been assessed by the Council in its 2015 Strategic Site Assessment which determined that a residential allocation would be appropriate. The assessment recognises that it offers the potential to deliver a comprehensive development that would make a significant contribution to meeting the housing needs of the Borough.

2.19 Drawing these points together, Taylor Wimpey request that land at Weeton Road, Wesham is allocated as a site for housing development within the FCLP.