



## **Gladman Developments Ltd**

### **Fylde Local Plan Examination**

#### **Matter 4 – Vision, Objectives and Development Strategy**

##### **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?**

Q26. 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?

1. It is acknowledged that the Vision of the Plan does touch upon all three elements of sustainable development, however we believe that further emphasis should be placed on delivering housing, within the social dimension of sustainable development.
2. Further, the vision promotes the Plan's ambitions for economic growth. Accordingly, more housing will need to be identified in order to meet the Plan's strategy for economic growth.
3. Gladman believe the vision itself should make a commitment to meeting the Fylde's full OAN rather than just 'sufficient levels of housing of appropriate type, tenure, design, density and mix to address local issues of affordability' and any unmet needs arising from the HMA during the plan period. This addition is necessary to help to ensure that the Plan adopts a positive approach to growth across the area as required by the Framework.

Q27. 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?

4. Whilst supporting many of the objectives of the Plan, Gladman do not consider some objectives to be suitably framed. In this regard, we refer to the Council's intention to 'Protecting best and most versatile agricultural land' and 'Protecting existing areas of Green Belt and proposed Areas of Separation'.
5. The objective relating to the protection of Best and Most Versatile Agricultural land is considered unsound and contrary to paragraph 112 of the Framework. This states that local planning authorities should consider the economic benefits of BMV and where significant development

of agricultural land is necessary then local planning authorities should seek to use areas of poorer quality land in preference to that of a high quality. There is therefore no outright restriction on the use of BMV and it is simply a factor to be weighed in the planning balance when considering a development proposal.

6. With regards to 'Protecting existing areas of Green Belt and the proposed Areas of Separation' this objective would appear to apply equal protection to both a nationally protected designation and a local designation and is contrary to the requirements of the Framework.
7. It is Gladman's opinion that new development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. In such circumstances, we would question the purpose of the proposed Areas of Separation, particularly if the intention of these areas is to implement new areas of Green Belt by the backdoor without meeting the stringent tests required.

**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?**

Q28. 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?
8. Gladman support the general thrust of the development strategy which seeks to focus housing development towards the four strategic locations over the plan period. These locations include Lytham and St Annes, the Fylde-Blackpool periphery, Warton and Kirkham and Wesham.
9. Whilst in principle, Gladman can see the benefit of the Council seeking to allocate development around principle urban areas, we do not consider that the Council has been sufficiently robust in maximising the levels of sustainably located, proportionate, housing development in areas which could support additional growth over that identified. Gladman contend that the approach to identifying growth locations is sound in terms of their overall selection, but flawed in relation to the amount of growth such settlements could reasonably take. The Four Locations for growth in particular represent sustainable locations, as evidenced by the Council's Settlement Hierarchy Background Paper (2016). However, settlements such as Warton, Kirkham, Wesham and indeed a number of tier 1 and 2 Rural Settlements, are likely able to accommodate further growth to meet the Council's full housing needs at the higher end of the OAN range.
10. Given the issues raised in response to the Council's OAN evidence, further sites may need to be allocated through the Plan to meet the authority's housing needs.
- b. Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for Fylde?
11. Gladman do not consider the development strategy as proposed will achieve the Council's vision and strategic objectives to deliver sustainable development for Fylde. The Plan's vision and objectives make a series of references to its aspirations for economic growth. Indeed, the Vision states '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...'
12. As previously expressed, it is disappointing to see that the Plan does not seek to deliver its full OAN for housing. As such, we do not consider that the submitted Local Plan is sufficiently effective in meeting housing needs and unmet needs arising from neighbouring authorities.