

Fylde Council Local Plan Examination

Stage 1 Hearing Sessions

Matter 4: Vision, Objectives and Development Strategy

Submission on behalf of Metacre Ltd

13th March 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd concerning Matter 4 (Vision, Objectives and Development Strategy).
2. The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (V1, 6th February 2017) and supplements the representations lodged with Fylde Council on the *Local Plan, 2032 Publication Stage* (August 2016). The two should be read together.
3. This submission is concerned with Matter 4 and in particular:
 - Issue 8, Questions 28 and 29

Matter 4, 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?

Question 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?*
 - b. Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for Fylde?*
 - c. Is the development strategy clearly defined within the Plan? Does Policy DLF1 clearly set out the distribution of development?*
4. Whilst it is accepted that the large majority of the Council's development needs ought to be delivered in the four strategic locations, there is concern that the development strategy for the non-strategic locations is not soundly based or sufficiently flexible to deliver the Plan's housing requirements.
5. Whilst Policy DLF1 states that an allowance should be made for the delivery of non-strategic sites within and adjacent to Tier 1 and Tier 2 Rural Settlements, the justification text to Policy SL5 states that the rural settlements are to be restricted to development targets of 150 homes and 50 homes respectively over the plan period. These targets are entirely arbitrary figures and it is inappropriate to treat these as a ceiling to development. To do so could mean that otherwise sustainable development is precluded against the clear guidance in NPPF policy.
6. Further to this, Policy GD1 goes on to state that development will be focussed on previously developed land within and immediately abutting the existing settlements, with the Policy suggesting that development proposals on greenfield sites will be limited to land *within* settlement boundaries only.
7. It has been widely acknowledged by the Council and s.78 appeal Inspectors that the settlement boundaries of the current adopted plan, which were adopted 13 years ago at a time when there was no need for additional housing, were so tightly constrained that they were unable to deliver the Borough's housing needs (See Metacre Ltd response to Matter 3, Question 23). This is a contributing factor to the current significant housing shortfall within the Borough. It is also generally accepted that there are limited development opportunities within the defined settlement boundaries, leading to the need for significant greenfield development on the edge of the settlements. It would appear that the proposed new settlement

boundaries in the publication plan have simply been extended to include the allocated / committed housing sites.

8. Accordingly there is concern that the potential for non-strategic development within or adjacent to the proposed settlement boundaries will be limited and thus there is little flexibility to deliver the Borough's housing requirement.

Question 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?

9. As set out in earlier representations, this representation objects to the exclusion of the settlement of Treales from the Council's emerging settlement hierarchy.
10. In the current adopted Local Plan the villages of **Treales**, Wharles and Little Eccleston have defined settlement boundaries, within which development is permitted. However, the Publication version now excludes these settlements from the hierarchy and the Proposals Map shows them washed over by countryside. As such they would be subject to policies which place significant restrictions on development.
11. Whilst it is acknowledged that the Council's *Settlement Hierarchy Background Paper* has sought to undertake a sustainability appraisal of settlements across the Borough, this assessment has been made entirely on the basis of accessible local services and facilities. Accessibility is only one factor in a wider set of considerations when determining whether a settlement can deliver sustainable development.
12. Furthermore, the Background Paper provides a score for each settlement and it would appear that any settlement achieving less than 10 points has been discounted as not sufficiently accessible for the delivery of sustainable development. Clifton received a score of 10 points and has been designated as a Tier 2 Settlement, whereas Treales, which received a score of 9, has been

discounted. It is considered that 10 points is an arbitrary figure and should be not a 'cut-off' as to whether a site has the potential to deliver sustainable development.

13. The Background Paper should simply be used as a sustainability tool to assist with determining the overall settlement hierarchy and in the decision making process, rather than essentially ruling out certain settlements for the delivery of any housing.
14. Such an approach is contrary to Planning Practice Guidance on Rural Housing which states that *“all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”* In this setting, the Council should not be essentially precluding development within, or adjacent to, rural settlements by showing them washed over by countryside.
15. Whilst this objection relates specifically to Treales, it would apply to all rural settlements outside of the Tier 1 and Tier 2 hierarchy, particularly those previously identified as being suitable for development in the adopted Local Plan.
16. Policy S1 is therefore unsound as it is not *consistent with national policy*, as paragraph 182 of NPPF states that the plan should enable the delivery of sustainable development in accordance with the policies in the Framework. The current approach to housing delivery in the rural settlements is contrary to PPG which is clear that all settlements can play a role in delivery sustainable development in rural areas.