

Independent Examination of the Fylde Local Plan

Hearing Statement submitted on behalf of
The Strategic Land Group (Representor
number 59)

Matter 4 : Vision, Objectives and
Development Strategy

March 2017

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?

- 1.1 The vision set out in the FLP¹ represents a generally positive expression of the overall direction of the Plan. The commitment to the delivery of more sustainable homes and to deliver economic growth within the Strategic Locations is firmly supported. However it is considered that in order to be aligned with the National Planning Policy Framework (NPPF) Paragraph 47 it should seek to '**significantly boost**' housing delivery, rather than simply 'boosting' as presently drafted.
- 1.2 Such an expression would be consistent with the priority placed on increasing the level of housing by existing and longstanding Government strategies, policies and documents, including the recently published Housing White Paper (HWP).
- 1.3 A key facet of the HWP relates to the delivery of housing. In announcing its release, the Secretary of State made clear that
- 'We are setting out ambitious proposals to help fix the housing market so that more ordinary working people from across the country can have the security of a decent place to live. **The only way to halt the decline in affordability and help more people onto the housing ladder is to build more homes. Let's get Britain building.**' [emphasis added]*
- 1.4 It is noted that the FLP vision makes no reference to the wider housing market area (HMA) and the clearly stated request from Wyre that Fylde assists in accommodating its unmet need. The shortcomings of the FLP in terms of the unmet need of Wyre is covered in more detail in the response to Matter 1 but it is considered essential that the vision is amended to be a positive expression in this respect reflecting the importance placed on meeting the identified need within the HMA as required by the NPPF.
- 1.5 An increased emphasis on housing delivery in the FLP, by amending the vision and the approach in relation to housing provision, to significantly boost housing is wholly aligned with the increase in the housing requirement recommended by SLG to ensure the FLP is sound (see Matter 3 statement).
- 1.6 It is concerning to SLG, however, that the substance of the FLP is inconsistent with the vision particularly in relation to housing delivery and meeting housing needs. It falls well short of the outcome envisaged by Government for the delivery of homes. The importance of ensuring that housing needs are met cannot be overstated and considerable importance must be placed on this issue.
- 1.7 The commitment to the delivery of improvements to junction 4 of the M55, as proposed to be referenced in the vision as per the Schedule of Proposed Minor Modifications² is

¹ Document ref. SD001, pages 26 - 28

² Document re. SD014, page 3

supported, as this recognises the importance of this junction in enabling the substantial amount of housing and employment growth that is proposed to be delivered within the Blackpool-Fylde Periphery (BFP) Strategic Location.

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?

- 1.8 SLG supports the Strategic Objectives, in particular, SO1, which supports the creation of sustainable communities in sustainable locations, principally the Strategic Locations. The specific objective to bring forward ‘a responsive and sustainable supply of housing land and buildings in sustainable locations’ (SO1, part c) is welcomed.
- 1.9 SLG also supports SO4 in terms of its positive approach to the provision of high quality and readily available employment sites in sustainable locations and to securing the jobs and investment associated with this. However, the FLP should be amended to make clear that the priority locations for employment development are those within the Strategic Locations (considered further under Matter 3).
- 1.10 Recognition under this objective of the positive effect of the potential for increased economic growth associated with the Lancashire Enterprise Zone and the Preston and Lancashire City Deal, is supported. However this needs to be reflected in the aspiration for housing and employment growth.
- 1.11 The Strategic Objectives should however make clear that it is a strategic objective to ensure that the full and objectively assessed housing and employment needs are met.

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?

- 1.12 The overall development strategy is set out in Policy DLF1. It specifies the housing and employment land requirements³ over the plan period. These aspects are considered further in SLG’s Matter 3 statement; in short SLG contends that the housing and employment requirements should be higher than proposed and that additional provision for sites capable of accommodating this growth should be identified. The Council’s own evidence base supports an OAN at the upper end of the range advocated in the Fylde

³ 7,768 homes and 60.6ha of employment land

Coast SHMA and associated addendums which casts doubts over the appropriateness of the overall proposed housing requirement.

- 1.13 In terms of how the growth will be accommodated, Strategic Locations have been identified as foci for development and growth. It is apparent that this has been on the basis of their existing characteristics and qualities and their potential contribution to accommodating sustainable development. They reflect the reality that Fylde is a largely rural borough with three large towns (Lytham/ St Annes, Warton and Kirkham / Wesham) and a border with the urban area of Blackpool (the Blackpool-Fylde Periphery (BFP)). It also reflects environmental and policy constraints that limit the availability of land for development within Fylde, including:
- Green Belt (particularly around the main urban areas)
 - Flood Risk (parts of the borough are in Flood Zones 2 and 3)
 - European Nature Conservation Sites; Biological Heritage Sites; Sites of Special Scientific Interest; Historic Parks and Gardens.
- 1.14 It is a logical approach to direct growth towards the Strategic Locations which are unaffected by such constraints and which have existing infrastructure, services and facilities to make them inherently suitable to accommodate further growth. Indeed, the Council itself explicitly acknowledges that the Strategic Locations comprise the most sustainable locations, stating that the *'new homes, jobs and services required by communities are located in the most sustainable locations'*.⁴
- 1.15 The process that Fylde has followed in developing its overall strategy and identifying the strategic locations is set out in various background and evidence base documents, including the Sustainability Appraisal⁵ (SA) which assesses different spatial strategy options, including a focus on Lytham St Annes and the BPF (Option 5), with different levels of growth considered for all options.
- 1.16 The SA demonstrates that this approach does not result in significantly detrimental environmental effects.
- 1.17 There is therefore a sound rationale and much evidence to support the strategy and the distribution of development towards the Strategic Locations. SLG supports the spatial distribution strategy proposed in the FLP.
- 1.18 This is particularly the case in respect of the BFP. The development potential of this Strategic Location has long been understood and accepted. Blackpool and Fylde Councils have previously jointly commissioned a study⁶ of the area around junction 4 of the M55 (i.e. the BFP) to determine what level of housing and employment development could be achieved. The study indicated that potential exists for about **5,000-6,000 dwellings** and 56ha of additional employment land in the area providing that other

⁴ Document ref. SD001, paragraph 1.7

⁵ Document ref. SD004, Appendix D

⁶ The M55 Hub, Conceptual Masterplan – Blackpool Borough Council and Fylde Borough Council 2010

supporting facilities including primary schools, secondary schools and neighbourhood centres are also provided.

- 1.19 It is SLG's contention that this Strategic Location can and should accommodate more housing and employment development than the amount currently envisaged in the FLP to ensure that it meets development needs in full.

(b) Will the development strategy achieve the Council's vision and strategic objectives and deliver sustainable development for Fylde?

- 1.20 SLG contend above that the vision and strategic objectives should be more positively expressed and reflect an increased level of housing and employment growth to ensure that development needs are met in full. It is essential that this is reflected in the remainder of the FLP.
- 1.21 SLG's Matter 3 response critiques the housing requirement figure used within the FLP, which is the lowest figure in the range identified in the Fylde Coast SHMA, as it makes an insufficient contribution to achieving sustainable economic growth. It contends that the figure should be increased to support economic growth aspirations.
- 1.22 The FLP fails to make sufficient provision to accommodate even the requirement of 370 dwellings per annum, with the FLP stating that sufficient land has been identified to exceed the total housing requirement of 7,768 dwellings. However, the extent to which it exceeds this figure is just c.1.6% (122 dwellings).
- 1.23 It is considered that such a small contingency figure does not provide sufficient flexibility, particularly as not all sites are guaranteed to come forward (or will not deliver as many units as expected). It is inevitable that there will be a degree of slippage, though no allowance is made for this in the FLP. In line with the Local Plan Expert Group's (LPEG) recommendations, a buffer equivalent to 20% of the housing requirement should be planned for. Based on the requirement sought by SLG this would be 440 450 dwellings.
- 1.24 The FLP must seek to accommodate the housing need in full, plus sufficient flexibility for the likelihood that not all of the sites will come forward (or that the yield will be lower than expected). To achieve this, additional large sites should be identified through the FLP. This is consistent with NPPF paragraph 47 which requires LPAs to:
- identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing; and
 - identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.
- 1.25 Such sites should be located within the Strategic Locations, to enable additional growth to be accommodated in the most sustainable locations. SLG's specific interest is in a site within the BFP which is free from development constraints and offers the potential to accommodate a substantial amount of housing and employment to contribute to meeting the Fylde (and Wyre) housing needs. SLG will provide further detail to the Part 2 Matters as necessary.

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

- 1.26 Policy DLF1 does not set out the distribution of development envisaged at the Strategic Locations - this is included within the supporting text⁷. The broad distribution could be expressed in the policy itself to ensure clarity. It could be suitably caveated to provide an element of flexibility.

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?

No comment

⁷ Document reference SD001, Page 41, Table 2