

Barton Willmore on behalf of Story Homes Ltd
Examination into the Fylde Council Local Plan to 2032
Matter 4
Representation ID: 058

Matter 4 – Vision, Objectives and Development Strategy

1. The following Hearing Statement is made for and on behalf of Story Homes. This Statement responds to selected questions set out within Matter 4 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 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?

3. Paragraph 50 of the NPPF is clear that Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. The Vision for Fylde up to 2032 is set out within Chapter 3 of the Publication Draft Local Plan¹ with additional minor modifications included in the Schedule of Proposed Minor Modifications document².
4. We generally support the Council's Vision for future development as it seeks to boost the delivery of sustainable homes and economic growth, however, we consider the role of Tier 1 and Tier 2 Settlements in achieving the Council's development strategy is understated.

The focus of growth in paragraph 2 of the Vision is placed on four Strategic Locations for Growth. We do not dispute that a significant proportion of development will be focused in these areas, however, the Council expects Tier 1 and Tier 2 Settlements to meet 10% of the housing needs of the Borough, and this is not dissimilar to the level of growth expected within the Warton Strategic Location for Development. It is therefore considered that

¹ Document Ref: SD01

² Document Ref: SD014

reference to these settlements should be made within paragraph 2 of the Vision rather than referred to as 'rural settlements'.

5. Subject to this minor modification to the wording of the Vision, overall the Local Plan sets out a positive Vision for the future development of the area. However, the Council's ambitions for growth must be reflected within the spatial strategy, to which we have set out our concerns in relation to Matters 1, 2 and 3.
6. We have no comments on the proposed Minor Modifications set out within Document SD014.

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?

7. We support Strategic Objective's 1, 2, 4 and 5 as they have been positively prepared, reflect the Council's Vision and reflect the aims of the NPPF to achieve sustainable development. Notwithstanding this, we do not agree that Strategic Objective 3 has been positively prepared. In relation to local services, part b. of Strategic Objective 3 aims to make services accessible by:

"Reducing rural isolation and social exclusion through the protection and provision of public transport, key services and facilities such as local shops and doctors surgeries. This may be linked to the allocation of new housing development within and on the boundary of Tier 1 Rural Settlements." [own emphasis]

8. Paragraph 28 of the NPPF is clear that planning policies should support economic growth in rural areas and to promote a strong rural economy local plans should:

"promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship."

9. Paragraph 55 of the NPPF also promotes sustainable development in rural areas, and confirms housing should be located where it will enhance or maintain the vitality of rural areas.

10. We consider the reference to supporting local amenities in Tier 1 Rural Settlements only is unjustified and inconsistent with the NPPF. The Council should be seeking to promote the retention of local services in all rural settlements including Tier 2: Rural Settlements which have also been established within the Local Plan as sustainable locations for growth. As drafted Strategic Objective 3 has not been positively prepared and should be amended to include reference to Tier 2: Rural Settlements.
11. We note the Council's Schedule of Proposed Minor Modifications³ proposes to add an additional bullet point to Strategic Objective 3, seeking to resolve congestion and capacity issues on M55 Junction 4. We have no comments to make in relation to this proposed Main 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?

12. The Local Plan anticipates over 83.6% of new housing will be delivered in the four Strategic Locations and 9.7% in Non-Strategic Locations with the remaining percentage delivered from allowances and unallocated sites.
13. We have serious concerns with the over-reliance placed on four Strategic Locations to deliver such a significant amount of the new housing within the Borough, especially in the early stages of the plan period, given the scale and complexities of delivering such large developments. This issue is further exacerbated by the fact the Council has also failed to provide any robust evidence in relation to the delivery rates of the Strategic and Non-Strategic Locations.
14. We consider there is a greater role for smaller sites within rural areas to contribute to housing need in the short term to maintain and enhance the vitality of rural areas whilst contributing to the overall supply, we therefore consider the strategy for the distribution of growth to be unbalanced and justified.

³ Document Ref: SD014

15. The Council published its Strategic Housing Land Availability Assessment (SHLAA)⁴ in October 2012. This Assessment was prepared to support the preparation of the Core Strategy and other Local Development Documents to demonstrate the number of dwellings which would come forward on specific and developable sites up to 2027.
16. The SHLAA (2012) outlines the sources of supply up to 2027, however, it does not provide an assessment of individual sites, and therefore, it cannot be considered a reliable source of evidence to support the allocation of strategic and non-strategic sites. Notwithstanding this, the Council's housing land supply position has changed considerably since the SHLAA (2012) was published and new sites have come forward that have not been assessed. This is therefore another reason why this cannot be considered a reliable source of evidence.
17. In December 2015, the Council undertook a high level review of the proposed Strategic Locations to assess their suitability of sites for development. The Strategic Site Assessments⁵ assesses the 31 proposed strategic sites against a range of indicators including accessibility, environmental sensitivities, infrastructure, landscape and viability. However, what the assessment does not do is consider appropriate timescales for delivery. We therefore do not consider the Strategic Site Assessment to be a reliable source of evidence to support the allocation of sites.
18. As stated within the Council's response to the Inspectors Initial Questions, the Council has applied standardised build out rates across all sites, which has informed the projected delivery at each Strategic Location and Non-Strategic Site. We set out our concerns in relation to the application of standardised delivery rates in response to Matter 3. Notwithstanding this, we consider the estimated delivery rates for the four Strategic Locations set out within Housing Trajectory at Appendix 2 of the Publication Draft Local Plan to be completely unrealistic.
19. The large scale of the Fylde-Blackpool Periphery Strategic Location means that it may be developed by multiple housebuilders. Whilst this would increase the overall output of housing units achieved per year in comparison to a smaller sites, the annual delivery rate from these sites must not be overestimated as increased local market competition can serve to dampen delivery rates typically achieved. The rate of delivery from these sites must not therefore be assumed to increase incrementally at a rate which is consistent with sites of one or two developer outlets, but decreased proportionately with each new additional developer to take account of the effects of market saturation. Whilst the application of these recommendations would represent a cautious approach, it would

⁴ Document Ref: ED018

⁵ Document Ref: ED028c to ED028g

significantly strengthen the position of the Council especially where a 'Strategic Site' achieves exceptional delivery rates.

20. The Council must also recognise that the delivery of the strategic sites at Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) will be difficult due to their scale and complexity. Such sites may be subject to multiple landownerships, and/or require a significant amount of upfront investment to enable their delivery (such as new road infrastructure, utilities and education provision). Lead-in times for the delivery of these sites can be significantly prolonged, and as a result cannot be reasonably expected to contribute to short term supply needs. A detailed critique of the deliverability of each site is included within Appendix 1 of this Statement.
21. In summary, given the reliance placed on Strategic Locations to deliver a significant proportion of housing growth we do not consider the use of standardised build out rates to be appropriate in this instance. As set out within Appendix 1 of our Statement we also have concerns that a number of Strategic Sites will not deliver until later in the plan period. The Council should seek to allocate additional smaller sites within rural areas that can come forward earlier in the plan period to help meet the needs of the Borough in the short term.

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

22. As set out within our responses to Matters 1 – 3, we remain concerned that the overall proposed housing requirement of 7,700 dwellings will not provide for a significant boost to housing land supply to support the opportunity to develop the local economy and support the needs of local people. The strategy is also ineffective in terms of expected delivery rates for housing growth to come forward. It therefore automatically follows that the proposed development strategy will not achieve the Council's Vision and Strategic Objectives to boost the delivery of sustainable homes and economic growth and the Council's aspirations for people live close to their place of work. The development strategy will not 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?

23. We have no comments to make in response to this 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?

24. Policy S1 of the Publication Draft Local Plan⁶ sets out the Council's proposed settlement hierarchy. We do not consider the settlement hierarchy set out within Policy S1 to be justified. As set out within our Regulation 20 Representations (extract included at Appendix 2 of this Statement) we object to the downgrading of Elswick from a Tier 1: Rural Settlement to a Tier 2: Rural Settlement. We consider the Council's approach to scoring the accessibility of settlements in the supporting Settlement Hierarchy Background Paper⁷ to be misleading and the Council has failed to take into account a number key local services, as outlined within paragraphs 28 and 70 of the NPPF, that contribute to sustainability of a settlement.
25. We note the Council has not chosen to update their evidence base in this regard, therefore, our previous concerns regarding the evidence contained within Settlement Hierarchy Background Paper still stands.
26. Appendix 2 of this Statement makes a full assessment of the range of amenities available in Elswick and compares the local amenities available with those available in Tier 1: Rural Settlements. Our assessment concludes that when considering the full range of facilities available, as outlined in paragraph 28 and 70 of the NPPF, the village is more comparable with other Tier 1: Larger Rural Settlements rather than Tier 2: Smaller Rural Settlements. For the reasons set out within our previous representations we therefore consider Elswick should be elevated within the settlement hierarchy back to a Tier 1: Larger Rural Settlement.
27. As set out within our responses to Matters 1-3, we have significant concerns in relation to the Council's proposed housing requirement and identified supply. The allocation of additional sites within the Local Plan is therefore essential to:
- To address unmet need from Wyre Council;
 - To help deliver the Borough's economic led growth requirement of 440 to 450 dwellings per annum as the current identified supply is insufficient;
 - To ensure greater flexibility in the supply for sites to come forward; and
 - To avoid over-reliance on the delivery of strategic sites early in the plan period.

⁶ Document Ref: SD01

⁷ Document Ref: ED002

28. We consider there is a greater role for sustainable rural locations such as Elswick to deliver smaller sites to contribute to housing needs in the short term.

APPENDIX 1

**EXTRACT FROM REGULATION 20 REPRESENTATIONS
ASSESSMENT OF STRATEGIC LOCATIONS FOR DEVELOPMENT (SECTION 5)**

**EXTRACT FROM REGULATION 20 REPRESENTATIONS, STORY HOMES
ASSESSMENT OF STRATEGIC LOCATIONS FOR DEVELOPMENT (SECTION 5)**

Strategic Locations for Development

- 5.1 Policies SL1 to SL4 of the Plan identifies four 'Strategic Locations' for development across Fylde. These include Lytham St. Annes, the Fylde-Blackpool Periphery, Warton and Kirkham and Wesham.
- 5.2 Our Client has concerns over assumptions made by the Council in terms of expected delivery rates and whether the larger strategic sites, Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) will deliver the proposed number of dwellings within the plan period given the significant amount of upfront investment and infrastructure required.
- 5.3 Our Client wishes to comment upon the proposed allocated sites in Chapter 7 of the Publication Draft Document as follows. We reserve the right to revise and update these comments as and when necessary in the future.
- 5.4 Such sites may be subject to multiple landownership, and/or require a significant amount of upfront investment to enable their delivery (such as new road infrastructure, utilities and education provision). Lead-in times for the delivery of these sites can be significantly prolonged, and as a result cannot be reasonably expected to contribute to short term supply needs. A detailed critique of the deliverability of each site within the four Strategic Locations is made within Section 5 of this report.

Policy SL1: Lytham St. Annes Strategic Location for Development

HSS1 – Queensway, St. Annes

- 5.5 Site HSS1 is situated to the north of St.Annes, between Heyhouses Way and North House Lane, and Kensington Developments has been granted outline planning permission for residential development of up to 1,050 dwellings in 29th April 2009 (App Ref: 08/0058).
- 5.6 Kensington Developments were subsequently approved permission for reserved matters in April 2015 for 110 dwellings (App Ref: 13/0257). A further reserved matters application was submitted by Kensington Developments in June 2015 for 927 dwellings (App Ref: 15/400). When the Revised Preferred Options document consultation took place in December 2015 this application was pending a decision, this remains the case. No other applications have been submitted since December 2015.

- 5.7 The Housing Trajectory at Appendix 2 of the Publication Draft Document assumes that this site will deliver 30 dwellings in 2016 and 60 dwellings per annum between 2017 and 2032. Our Client has previously raised concerns in relation to the delivery assumptions being applied by the Council relating to the delivery rates of this site.
- 5.8 It remains our understanding that Kensington Development's (the applicant for the outline and reserved matters applications), intends to develop this whole site alone. The Council has not provided any evidence as part of the Local Plan to suggest to the contrary. As a developer within Fylde, our Client considers the consistent delivery of 60 dwellings per annum on this site to be unrealistic for one developer, in reality it is more likely to be 30 dwellings per annum at best.
- 5.9 The delivery of this site is also reliant on the implementation of the new M55 Junction 4/Heyhouses Link Road. The Infrastructure Delivery Plan (August, 2016) confirms the Council has now secured funding for the new link road from Section 106 Contributions, LEP Local Growth Fund and Highways England and is expected to be delivered by 2019.
- 5.10 Notwithstanding this, the first phase of development for 110 dwellings is reliant upon the delivery of the roundabout at the junction of Queensway and Kilnhouse Lane to obtain access. We understand a temporary access will be available for preloading of the site to take place, however, as work is yet to begin on the roundabout, it is highly unlikely the site will deliver any dwellings within the next two years. Optimistically, our Client expects that this site will not deliver dwellings until at least 2019 once a suitable access into the site can be achieved.
- 5.11 In summary, our Client considers it unlikely that the full 1,150 dwellings will be delivered within this plan period. At a more realistic delivery rate of 30 dwellings per annum with dwellings being delivered on site from 2019, it is expected the site will deliver at best 390 dwellings over the plan period leaving a shortfall of 540 dwellings. To ensure the full objectively assessed housing of this plan period are met in full there will be the need for further sites to be allocated.

MUS4 – Heyhouses Lane, St. Annes

- 5.12 Site MUS4 is a mixed use development site located off Heyhouses Lane and is allocated for 322 dwellings. It was previously referenced as HSS2 as part of the Revised Preferred Options consultation and was allocated for 250 dwellings. Two thirds of the site benefits from planning permission for a supermarket, public house and 162 dwellings. This development commenced in 2014 and is expected to be complete in 2020.
- 5.13 The remaining part of the site is occupied by Electronic Data Systems (EDS). Our Client previously objected to the allocation of this part of the site within the Local Plan as the

Council had failed to provide any evidence that the site was available. Since then, an outline planning application has been submitted on this part of the site for the development of up to 160 dwellings (App Ref: 15/0787). Our Client therefore accepts that this site is now available and will contribute towards Fylde's housing requirement within the plan period.

HSS3 – Lytham Quays, Lytham

- 5.14 Site HSS3 is a residential site on the eastern boundary of Lytham and has planning permission for 120 dwellings. Development commenced in 2007/2008 and is now complete. Our Client accepts that the dwellings constructed from 2011 onwards will contribute towards Fylde's housing requirement within the plan period.

HS1 – Queen Mary School, Clifton Drive South, St. Annes

- 5.15 Site HS1 was not previously allocated within the Revised Preferred Options document; however, development commenced on this site in 2011 and the 41 dwellings are due to be completed by 2017. Our Client does not contest the deliverability of this site within the plan period.

Other Site Allocated with Lytham St. Annes

- 5.16 Our Client does not wish to make comments in relation to the remaining sites allocated for development as part of Policy SL1.

Policy SL2 – The Fylde-Blackpool Periphery Strategic Location for Development

HSS4 – Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor

- 5.17 Site HSS4 is situated to the west of Blackpool Airport in the Blackpool Airport Corridor and was previously used as a holiday park. The site has planning permission for 351 dwellings.
- 5.18 Our Client is aware that construction has commenced on site and the development is being actively marketed by Persimmon Homes. Our Client accepts that there is no evidence why this site will be undeliverable within the plan period, however, our Client considers the consistent delivery of 60 dwellings per annum from 2016 - 2021 on this site is unrealistic for one developer. Only 12 plots have been registered on the site since construction began in 2015, based on passed delivery rates the site is more likely to be 20-25 dwellings per annum at best.

MUS1 – Cropper Road East, Whitehills

- 5.19 Site MUS1 is a mixed use development site located to the east of Cropper Road, Whitehills, expected to deliver 451 dwellings over the plan period.
- 5.20 Wainhomes has commenced development of 146 homes on part of this site and this is expected to be completed by 2022 (App Ref: 12/0717).
- 5.21 There are three other outline applications on the site for a mix of employment and residential use, for 200, 80 and 26 dwellings respectively (App Ref: 15/0114, 15/0472 and 13/0753). The applications for 80 and 26 dwellings have been approved and the application for 200 dwellings is outstanding.
- 5.22 Whilst the site benefits from planning permission, the site is isolated from settlements and services. The delivery of the remaining part site is reliant on improvements to local infrastructure, which has the potential to stall development if this is not in place. This will result in patterns of unsustainable development.
- 5.23 Furthermore, one of the outline applications forms the second phase of the Wainhomes site, therefore, this is unlikely to start delivering until the first site is complete. The market competition of other sites coming forward within the Fylde-Blackpool Periphery will also serve to dampen delivery rates. It is highly likely that a high proportion of dwellings will not come forward until late in the plan period, the delivery rates should therefore be adjusted accordingly.

MUS2 – Whyndyke Farm, Preston New Road, Whitehills

- 5.24 Site MUS2 is a mixed use development site situated to the east of Preston New Road (A583). The Council is minded to grant outline planning permission for 1,310 dwellings (subject to signing a Section 106 Agreement) on the site; including the provision of two new local neighbouring centres, a primary school and a health centre, in addition to improvement to Junction 4 of the M55.
- 5.25 The delivery of the site is dependent upon the implementation of significant new infrastructure. The Infrastructure Delivery Plan (August, 2016) confirms that the funding for this infrastructure is dependent upon Section 106 Contributions. Since the Council drafted their Decision Notice in July 2015, no Section 106 Agreement has been signed, there is therefore no committed capital to implement the infrastructure required. The Council has provided no indication of timescale for when the Section 106 Agreement is likely to be signed. Our Client is therefore concerned without this commitment in place there is no certainty that this site is deliverable.

- 5.26 Our Client also remains concerned that the Council has failed to fully consider the timescales required to implement key infrastructure to deliver this site, which could potentially slow down development.
- 5.27 The Housing Trajectory at Appendix 2 of the Publication Draft Document expects the site to start delivering 30 dwellings in 2018 – 2019 and 60 dwellings per annum between 2019 and 2032, this is reduced from the proposed delivery of 100 – 110 dwellings per annum in the Revised Preferred Options document.
- 5.28 Our Client accepts that the scale of the site means it is likely to be delivered by multiple housebuilders, therefore, a conservative delivery rate of 60 dwellings per annum is more appropriate than that proposed in the Revised Preferred Options document. Nonetheless, without specific timescales or committed funding it is unclear whether the proposed delivery rates are realistic. Until such time the Council can provide evidence that the funding for key infrastructure can be secured, our Client cannot be sure that this site will be deliverable over the plan period.

HSS5 – Cropper Road West, Whitehills

- 5.29 Site HSS5 is situated west of Cropper Road, Whitehills and is expected to deliver 442 dwellings over the plan period, with delivery expected to start in 2020.
- 5.30 Our Client remains of the view that this site is undeliverable within the plan period. Cropper Road is a narrow highway with no public footpath. Significant highways improvements would be required to Cropper Road to facilitate the development. The Council has failed to provide any evidence that this would be achievable.
- 5.31 The site is currently unavailable and within the ownership of multiple land owners who currently occupy the site. This has the potential to impact upon the lead in time of the site if one landowner is not willing to cooperate. No evidence has been provided that the entire site will be available for development in the long term.
- 5.32 As stated in the Strategic Sites Assessment Paper (2015) the development of this site is also dependent on the provision of relevant facilities and services at Whyndyke Farm and improvements to Junction 4 of the M55 motorway, the timescales for which are currently unknown.
- 5.33 Furthermore, the market competition of other sites coming forward earlier in the plan period within the Fylde-Blackpool Periphery can serve to dampen delivery rates. Our Client therefore contests that this allocation should be removed from the Local Plan as it is potentially

unsuitable, unavailable and undeliverable. To ensure the full objectively assessed housing of this plan period are met in full there will be the need for further sites to be allocated.

HSS6 – Land at Lytham St Annes Way, Whitehills

- 5.34 Site HSS6 is situated off Lytham St Annes Way and has planning permission for 150 dwellings. Our Client is aware that development has commenced and accepts that the Site will be deliverable within the plan period.

HS21 – Land to the rear of 11-63 Westgate Road, Squire Gate

- 5.35 Site HS21 was not previously allocated within the Revised Preferred Options document; however, the site is expected to deliver 70 dwellings over the plan period. An application was submitted in August 2012 for the development of 46 apartments and 26 houses (72 dwellings in total), however, this application was never determined. Subsequently, planning permission was approved in July 2016 for the development of 25 dwellings, therefore, 45 dwellings needs to removed from the overall supply figure.

Other Site Allocations within Fylde – Blackpool Periphery

- 5.36 Our Client does not wish to make comments in relation to Sites HS22 and HS23.

Policy SL3 Warton Strategic Location for Development

HSS2 – Blackfield End Farm, Church Road, Warton

- 5.37 Site HSS2 was not previously allocated within the Revised Preferred Options document; however, the site has since been granted outline planning permission at appeal by the Secretary of State in September 2015 for 360 dwellings which is why it is now proposed for allocation. The site is expected to deliver 15 dwellings in 2017 – 2018 and 2030 – 2031, and 30 dwellings per annum from 2018 – 2019 to 2029 – 2030.
- 5.38 Our Client is concerned that the delivery assumptions being applied by the Council relating to the delivery of this site are unrealistic. Whilst outline planning permission has been granted, the applicant (Hallam Land) are a strategic land company, they will need to dispose of the site to a housebuilder/developer, who will need to gain reserved matters approval, undertake site preparation works and implement the required infrastructure. From our Clients experience it is unlikely the site start being deliverable until at least 2019 at best. The site may therefore not be developed in full over the plan period.

HSS7 – Highgate Park, Lytham Road, Warton

5.39 Site HSS7 consists of the Former GEC Marconi Factory and adjacent land off Lytham Road in Warton. The Site has planning permission for 254 dwellings. Development commenced on site in 2014, with first completions in 2014/15. Our Client does not contest the deliverability of this site within the plan period.

HS24 – Riversleigh Farm, Warton

5.40 Site HS24 was not previously allocated within the Revised Preferred Options document; however, the site benefits from full planning permission for 82 dwellings which is why it is proposed for allocation. Prospect Housing commenced development on site in 2014, with first completions in 2014/15. Our Client does not contest the deliverability of this site within the plan period.

HS25 – Nine Acres Nursery, Harbour Lane Phase 1

5.41 Site HS25 was not previously allocated within the Revised Preferred Options document; however, development commenced on this site in 2013 and the 75 dwellings are due to be completed by 2017. Our Client does not contest the deliverability of this site within the plan period.

HS27 – Oaklands Caravan Park, 252 Lytham Road, Warton

5.42 Site HS27 was not previously allocated within the Revised Preferred Options document; however, there is currently a pending outline planning application for 53 dwellings (App Ref: 15/0194) on the site which is why it is now proposed for allocation.

5.43 Our Client notes that Lancashire County Council has objected to this application on the grounds that the proposed development will have a greater impact than the existing development, on the highway network in terms of highway safety, highway capacity and will lead to greater queue lengths at junctions on the A584. Our Client therefore considers that this site is undeliverable and should be removed as an allocation, until the highway issues have been successfully resolved.

Other Site Allocations within Warton

5.44 Our Client does not wish to make comments in relation to Site HS26.

Policy SL4 Kirkham and Wesham Strategic Location for Development

HSS8 – The Pastures, Fleetwood Road, Wesham

5.45 Site HSS8 is situated north of Wesham and planning permission has been granted for 264 dwellings on the site and is currently under construction. Our Client does not contest that this site will be delivered within the plan period.

HSS9 – Land north of Blackpool Road, Kirkham

5.46 Site HSS9 is bordered by the A583, A585 and the railway line to the west of Kirkham. Our Client was granted reserved matters for the development of 117 dwellings on part of this site. The site is under construction and our Client can confirm this will be delivered within the plan period.

5.47 Barratt Homes has planning consent for 180 dwellings on part of the site. The site is under construction and our Client does not contest that this site is deliverable within the plan period.

5.48 Morris Homes has a pending planning application for 291 dwellings on the northern part of the site. Our Client does not contest that this site is deliverable within the plan period.

HSS10 – Willowfields, Derby Road, Wesham

5.49 Development at site HSS10 commenced in 2008. The development is now complete; however, our Client questions whether all dwellings were delivered within the plan period or whether some dwellings were delivered before. The Housing Trajectory states that 71 dwellings were delivered in 2011-2012, the Council should not include dwellings that were completed before the start of the plan period, if dwellings were completed before 2011 they should be removed from the overall supply.

HS28 – Sunnybank Mill, Kirkham

5.50 Site HS28 was not previously allocated within the Revised Preferred Options document; however, it is now proposed to deliver 31 dwellings within the plan period. The site does not currently benefit from planning permission and is currently unavailable with existing commercial uses on the site. The site should therefore be removed from the Council's supply unless further evidence in terms of availability is provided.

Other Site Allocations within Kirkham and Wesham

5.51 Our Client does not wish to make comments in relation to Sites HS29, HS30, HS31, HS32, HS33, HS34, HS35 and HS36.

Summary

- 5.52 Our Client has concerns with the deliverability of the Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) strategic sites in terms of the proposed delivery rates and timescales for delivering required infrastructure. The failure to deliver these sites would represent a fundamental failing of the Plan, unless significantly greater provision is found through further allocations.
- 5.53 Our Client is also concerned that Sunnybank Mill, Kirkham (HS28) and Oaklands Caravan Park (HS27) are currently unavailable or unsuitable for development and should therefore be removed as allocations. The delivery rates proposed at Willowfields, Wesham (HSS10) and Blackfield End Farm (HSS2) are considered unrealistic and should be reconsidered in line with our comments above.
- 5.54 The Council has identified enough land to accommodate a supply of 7,891 dwellings, 121 dwellings above the proposed housing requirement. Given our Client's concerns in relation to the deliverability of a number of proposed allocation, it is considered that the Council has failed to provide an adequate land to ensure that the housing requirement is met and to ensure the plan provides sufficient flexibility to adapt to rapid change as required by paragraph 14 the NPPF.
- 5.55 Our Client considers that the Council must look to allocate additional sites to ensure that if there is a failure to deliver, an ongoing shortfall is avoided. This includes the allocation of sites within rural villages.

APPENDIX 2
EXTRACT FROM REGULATION 20 REPRESENTATIONS
PROPOSED SETTLEMENT HIERARCHY (SECTION 4)

EXTRACT FROM REGULATION 20 REPRESENTATIONS
PROPOSED SETTLEMENT HIERARCHY (SECTION 4)

Policy S1: The Proposed Settlement Hierarchy

- 4.1 Policy S1 establishes a hierarchy of settlements to inform new development across Fylde. The Revised Preferred Options document identified Wrea Green and Elswick as Tier 1: Larger Rural Settlements, which our Client supported.
- 4.2 Following the Revised Preferred Options consultation, the Council published a "Settlement Hierarchy Background Paper" (SHBP) in March 2016. As a consequence of this Paper, the Council has chosen to downgrade Elswick from a Tier 1: Larger Rural Settlement to a Tier 2: Smaller Rural Settlement on the basis it scored below Singleton and Weeton (proposed Tier 2: Smaller Rural Settlements) in terms of accessibility.
- 4.3 Our Client objects to the downgrading of Elswick to a Tier 2: Smaller Rural Settlement as it is considered the accessibility scoring within the SHBP is misleading as it fails to consider all of the amenities available in the village. As such the Policy has not been positively prepared and is considered inconsistent with national policy.
- 4.4 Our Client wishes to make the following comments in relation to the methodology utilised in the SHBP and subsequently set out our case as to why Elswick should be designated as a Tier 1: Larger Rural Settlement.

SHBP Methodology

Assessment Criteria

- 4.5 Section 3 of the SHBP confirms each settlement has been assessed against the accessibility criteria and scoring system set out within the former North West of England Plan Regional Spatial Strategy to 2021 ("RSS") and the former Joint Lancashire Structure Plan. The Council contests that the principles used in the RSS remain sound and so the criteria and scoring in that document can be used to provide an indication of the weight that can be given to different themes.
- 4.6 Whilst our Client accepts that accessibility criteria from the RSS provides a good starting point, the assessment should be based upon up-to-date policies contained within the NPPF not the revoked regional strategy.
- 4.7 The NPPF does not define specific criteria for assessing accessibility, however, it does identify core principles and key local services which contribute to the sustainability of a settlement.

This includes all of the criteria used within the SHBP assessment, however, it also includes a number of other important local services.

4.8 Paragraph 28 of the NPPF states:

"...To promote a strong rural economy, local and neighbourhood plans should:

- ***Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship."*** (own emphasis added)

4.9 Paragraph 70 of the NPPF also states:

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- ***Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments..."*** (own emphasis added)

4.10 It is clear that the NPPF considers sports venues (including outdoor), cultural buildings, public houses and places of worship as key community assets that contribute to the sustainability of a settlement. The Council should therefore seek to update the SHBP to include an assessment of the additional criteria identified in paragraphs 28 and 70 of the NPPF.

Scoring

4.11 In terms of scoring, the SHBP states population, bus services, shops, primary schools and open space are regarded to have the biggest influence on the position of each settlement in the settlement hierarchy, therefore, attribute a maximum score of 5 in line with RSS guidance. However, the scoring system fails to recognise the importance placed of other amenities identified in the NPPF including public houses, community halls, places of worship and sports venues. The scoring system should therefore be revised to reflect the emphasis the NPPF places on these services and facilities.

Services and Facilities Available in Elswick

4.12 Taking into account the full range of amenities available in Elswick, the village is more comparable with other Tier 1: Larger Rural Settlements rather than other Tier 2: Smaller Rural Settlements.

- 4.13 Similar to other Tier 1: Larger Rural Settlements, Elswick has a convenience store, village hall, 2 x public houses, a church, open space and outdoor sports facilities. This includes a children's playground, sports field, tennis courts, bowling club and equestrian centre. The population size of Elswick is also reflective of other Tier 1: Larger Rural Settlements (Staining, Wrea Green and Newton).
- 4.14 The only reason Elswick scores marginally less than other Tier 1: Larger Rural Settlements is due to the fact it does not have a primary school within 800m of the village centre. It is noted whilst Staining, Wrea Green and Newton all have their own primary school, Copp C of E School is the 'local' school used by most families in Elswick. The school is located 1.2km to the north of the village, within the acceptable walking distance to a school and is accessible via safe pedestrian routes. Elswick should therefore be considered as having easy access to a primary school.
- 4.15 Accordingly, when comparing the availability of other amenities in Elswick to other Tier 2: Smaller Rural Settlements. Clifton has no amenities except a convenience store/post office. Singleton has a church, public house and village hall but has no convenience store or sports provision and Weeton has a public house, village hall and mobile library but has no convenience store, church or sports provision. Paragraph 28 of the NPPF emphasises the importance of convenience stores, churches and sports provision as key community assets within rural communities.
- 4.16 Compared to some other rural settlements, Elswick along with Clifton also benefit from the best rural public transport opportunities in the Borough which promotes and facilitates sustainable non-vehicular travel.
- 4.17 The village is served by three bus services, the 75A, 76 and 80, providing services to Preston, Blackpool, Fleetwood, Poulton-le-Fylde, Lytham St. Annes and Great Eccleston. In addition to the public bus services, the local bus stops are also served by 6 different school bus services for secondary education facilities during the peak hours. Whilst there is no bus service past 6pm, this service is not so infrequent for it to be considered impractical for day-to-day use for work, school and trips to the supermarket etc. Furthermore, developer contributions from any future housing growth in the village may increase the viability of the service and lead to an expanded service beyond 6pm.
- 4.18 It is also worth noting at this point, despite being a Tier 2: Smaller Rural Settlement, Clifton has a housing allocation of more than 100 dwellings, even though it is less sustainable than Elswick with only a convenience store and post-office within the village. There is no clear justification as to why Clifton can take 100 dwellings and Elswick only 50.

4.19 As drafted the Policy has not been positively prepared and is considered inconsistent with national policy as the SHBP fails to take into account a number key amenities identified within the NPPF as par of their assessment. It is clear from our comments that the services and amenities available in Elswick are more comparable with those in Tier 1: Larger Rural Settlements rather than Tier 2: Smaller Rural Settlements. For the reasons set out above, our Client considers Elswick should be elevated within the settlement hierarchy back to a Tier 1: Larger Rural Settlement.