

June 2013

~ **MINORITY REPORT** ~

ON THE FYLDE LOCAL PLAN TO 2030 Preferred Options Consultation Document

an alternative perspective



FYLDE LOCAL PLAN TO 2030: PART 1. PREFERRED OPTIONS.
CONSULTATION DOCUMENT

MINORITY REPORT

INTRODUCTION

Future development within Fylde will be guided by the plans and policies within the Fylde Local Plan to 2030 which is why it is so important that they are acceptable to our communities, and they command the widest possible support from Fylde's Borough Councillors and residents.

To help to refine and select the Preferred Options from the five scenarios that were proposed last year, a Local Plan Steering Group was formed. All Councillors welcomed this move because it widened participation in the process. Potentially, it gave greater democratic input to, and the promise of more broad-based support for, the decision making process to develop the new Local Plan.

Sadly, the promise of democratic input offered by this process became a sham when dissenting voices proposing amendments were disregarded.

As a result, the non-Conservative Councillors on the Steering Group felt unable to support several of the policies that were chosen as 'preferred'.

We attempted to amend these policies through democratic methods but have been advised that the Preferred Options would be decided by the Cabinet Portfolio Holder for Planning and Development and, as he does not agree with our amendments, the Policies will not be altered.

It is therefore necessary for us to make our position clear in this minority report.

POLICY AMENDMENTS

Non-Conservative members of the Local Plan Steering Group support much of the Preferred Options Consultation Document but, regrettably, we cannot support it in its entirety. Our chief areas of concern are summarised below.

We cannot, and do not, take ownership of the Local Plan Part 1: Preferred Options document in its present form as we believe that Greenfield land should only be built on as a last resort.

We now outline those areas of the Preferred Options document which we believe must be amended:-

1. Employment Land Chapter 6

We assert that the evidence base, in relation to Employment Land assessments is, in part, flawed and, therefore, cannot be relied upon. When this is taken into account this means that there is an overstated need which results in an over allocation of employment land, if as we believe, this is the case, then this land can be used for housing freeing up Greenfield sites.

The Employment Land Study has not been out to public consultation and has not been included in the Preferred Options Local Plan consultation document.

2. Housing Need Chapter 7

The local demographics, as far as Fylde is concerned, show a net loss in housing need figures as more people die in Fylde than are born. We are also of the opinion that the fragmentation of households in Fylde is not as great as shown.

We believe the original and subsequent Fordham Housing Need Assessments overstated and inflated real housing need, and this approach has now been carried forward into the Preferred Options document. Ultimately, this inflates the number of homes presumed to be required, and the area needed for them.

We assert that we should not have to lose too much of our green fields to accommodate inward migration and we pose the question “Should Fylde lose too much of its green fields to accommodate the inward migration of people who wish to move here”? This is a political decision and it’s perfectly right that residents should take a view as to how much land they want to lose.

3. Housing Figures Chapter 8

In recent months there have been very significant changes to the background statistics used to model the housing numbers and the land allocations required to meet the projected need to 2030.

The revised base figures from the 'Office of National Statistics' are now available and must be incorporated immediately. As these figures show the population trends from a recent start point, clearly there should be no requirement to account for underperformance on figures for previous years.

Additionally, the simplistic approach of using all age average household size to convert the population to housing unit numbers can be replaced by a model which accounts for the predicted significant age shift towards elderly residents who will live in significantly smaller households.

All of these aspects significantly undermine the very foundation of the mathematical base on which the preferred option report is founded and will demonstrate that the housing need figures - even excluding the current economic circumstances - are massively overstated.

These figures are being worked on and challenged by many different groups.

Additionally, the 5 year supply status is over reliant on "build out" rates over which neither the Development Management Committee or Planning Officers have any control. This is solely in the control of Developers and must be challenged as permissions are already in place which more than cover and well exceed a 5 year supply.

The Government is looking to produce a policy to prevent 'Land Banking' at this moment. This effectively is what is happening in Fylde Borough. If there was a huge need for housing, these permissions would have been taken up and built.

4. Areas of Separation Policy GD2 Chapter 8

The Plan shows an area of separation between Wrea Green and Kirkham. We believe this Policy should be used in other areas of the Borough to ensure separation of settlements and list below other areas which would benefit from this policy:-

- Dow Brook, Kirkham, to Treales.**
- Moorside, Treales, to Wesham, including Mowbreck Lane and the countryside either side of Mowbreck Lane down to Dow Brook, Kirkham.**
- Land west of Westby between Westby and Whitehills.**
- Land between Wesham and Greenhalgh.**
- Land between Poulton and Singleton.**
- Land to the west of Kirkham to Westby.**
- Land to the north of Kirkham to Wesham.**
- Land to the east of Kirkham to Newton.**

5. Affordable Housing Policy H3 Paragraph 2

We proposed that the wording in this paragraph be altered to read “the provision of affordable housing will be to meet the need for those settlements”. The existing wording in the Plan effectively means that Kirkham, Wesham Warton, Freckleton and Lytham St. Annes will take all the affordable housing for the Borough. Developers in Lytham St. Annes usually attempt not to build social housing on their developments and instead give cash equivalents to provide social housing elsewhere in the Borough and, as there is no housing development proposed for Freckleton, it means that Kirkham, Wesham and Warton will tend to get ever increasing numbers of this type of housing. This is poor planning and affects the balance of housing provision in communities.

Our proposed change of wording was not accepted. It was defeated, chiefly by a block vote of Fylde’s Conservative group. We regard this change as being essential for a sound plan.

6. Junction 3

Although land in the immediate vicinity of Junction 3 has been "assessed but not included", putting in the employment land at E4 at 'Land West of Fleetwood Road' compromises this position. If this Employment Land is agreed in the Preferred Option Part 1, this will join Wesham to Greenhalgh on the left hand side and so therefore to Junction 3 on that same side. This will make the Land 'identified but not included' very vulnerable and so open up the whole area to Employment/Industrial uses.

This junction and the A585 are already overburdened and way beyond vehicular capacity. To add heavy traffic associated with the above uses would be unsustainable.

The specialist report by the Consultants appointed to do the Employment and Economic Land Study determined that whatever statistical approach was used there was no actual need for additional "employment land" and in fact some that was previously designated could be used for other purposes.

The suggestion of new locations on the Lytham boundary, Poulton boundary, Blackpool airport, Whiehills, Kirkham, Wesham and Greenhalgh was simply to offer choice and in the case of Wesham, Kirkham and Greenhalgh access to a Motorway junction but the report could not offer any need at this time for such locations.

The lack of all types of infrastructure at the Kirkham, Wesham and Greenhalgh locations would mean that any development would need to be of large scale to justify supplying such costly infrastructure.

Fylde is actually oversupplied with Economic Employment land and no mention is made in the Plan of the Warton Enterprise Zone providing High Tech jobs or

of the impact the newly proposed Junction 2 access will have on employment prospects. This will give access to the Springfields possibilities, as well as the Preston North area of development.

The Blackpool boundary proposals at Whitehills, Cropper Road and Whyndyke Farm will help any neighbour needs/duty to cooperate in the area which has the highest unemployment and easy access to the M55, retail and other services.

6. Strategic Housing Land Availability Assessment

At the rear of the Preferred Options Consultation there are maps of sites which appeared in Fylde's SHLAA document as possible additional sites for development. We proposed that these maps be removed as we feel that they give an indication that development might be acceptable in these areas. The Conservative Administration refused to remove them.

We believe that Brownfield or surplus employment land should be used for development, not open countryside and we think that there is enough of this type of land to accommodate housing and employment needs. Whilst we accept that the Government is making life very difficult for District Councils by insisting on a five year land supply for house building in Local Plans, we contend that there are better ways of allocating land which would result in Greenfield sites outside settlement boundaries being protected thereby preserving the individual character of our towns and villages.

7. Option 5

During the last public consultation the section numbered, Option 5, (Whyndyke) came out as the most popular Option. It was preferred by most people as it fulfilled the functions of providing the housing numbers required by the Government, whilst protecting our individual towns and villages.

We were informed that, as Whyndyke could not be delivered within the Plan period, its inclusion would render the Plan unsound. We have spoken to the agent of the landowner and he informs us that it will be possible to deliver 100 houses per year, 500 in the first five years and up to a total of 1,500 within the plan period. He also informs us that the developer will also supply a school, roads, bus routes, shops, cycle lanes and employment land on the site which will mean that, rather than developing a big housing estate on the edge of a town, all facilities will be on site and sustainable. He also states that the statutory infrastructure providers are on board with this development and are happy that there will be more than enough capacity in the system. Blackpool Borough Council is also very happy with this development as it will fulfil housing need for Blackpool as well as employment land which in turn also complies with the "Duty to Co-operate" between councils.

For this reason we support removing Policy EC1 from the Preferred Options document and replacing it with Policy SL2 as the preferred strategic location for development.

8. Option SL4

For the reasons stated above we propose that Option SL4, land to the west of Kirkham and Wesham should be removed from the Preferred Option document as a strategic site. We do not believe that the case for the employment land has been made and therefore it should be removed, we also think that the housing numbers can be accommodated on brown field sites in Kirkham, which have not been properly explored, so to use open countryside is quite obviously wrong.

The consultation document refers to “the edge of settlements” on several occasions in this section. These proposals are not on the edge of settlements; they are outside the settlement boundary. The settlement boundary at Kirkham and Wesham is the by-pass, a hard edge which is the strongest boundary to protect, if this settlement boundary is breached then every settlement in this Borough is at risk.

The infrastructure requirements for waste water and electricity are extremely limited and much of the area in this vicinity is subject to flooding during periods of heavy rain. To fund adequate infrastructure would be too costly for the number of houses proposed and will require lengthy sewer requisition, we therefore believe that this will be just phase one of housing development and additional housing would be difficult to defend once the settlement boundary is breached.

This development would see more farmland taken out of food production; would put stress on already crowded schools, doctors and dentists and would use school playing fields for housing development. It would have no connectivity to Kirkham and Wesham, it has no sustainability and poor access and egress and it would not be possible to provide the housing within the plan period.

9. Options (H8, H9, H10 and H12)

The extensive development proposals encircling Warton will increase the scale of the village by more than 75%.

The justification for development on this scale is weak, and hinges chiefly on:

- the accuracy of predictions for employment land need (which we do not accept at 1 above).
- the expansion predicted for the BAe Enterprise Zone (which as the document says (at 9.20) are ‘based around high technology industries’, and which typically produce low volume employment opportunities); and
- the elevation of Warton from it being a ‘Local Centre’ (serving its own community) to become a ‘Key Service Centre’ (serving a wider than local area).

The document’s preface acknowledges Warton as a village, and the Strategic Objectives: Chapter 4 (s 4.8 Sub Objective 2) include a requirement to retain

‘the identity, character and setting of the rural village. We are unwilling to support them in their present form.

CONSIDERING THE PREFERRED OPTIONS AT COUNCIL

After the Cabinet Portfolio Holder for Planning dismissed the above concerns in Steering Group meetings, he alone approved the Preferred Options for public consultation.

Before doing so however, he sought endorsement of his decision by a Special Meeting of the Full Council.

At that meeting, non-Conservative Councillors attempted to get amendments made to the Plan before it went out to public consultation. The following amendments were proposed and defeated and the voting record was as shown below:-

Votes for the proposals (17) Councillors Keith Beckett, Julie Brickles, David Chedd, Maxine Chew, Alan Clayton, John Davies, Charlie Duffy, Tony Ford, Kath Harper, Howard Henshaw, Karen Henshaw, Paul Hodgson, Linda Nulty, Elizabeth Oades, Louis Rigby, Elaine Silverwood, Heather Speak.

Votes against the proposals (22) Councillors Brenda Ackers, Ben Aitken, Christine Akeroyd, Frank Andrews, Tim Armit, Tim Ashton, Fabian Craig-Wilson, David Donaldson, David Eaves, Susan Fazackerley, Trevor Fiddler, Gail Goodman, Nigel Goodrich, Angela Jacques, Cheryl Little, Barbara Nash, Edward Nash, Albert Pounder, Dawn Prestwich, Richard Redcliffe, Thomas Threlfall, Vivienne M. Willder.

1. Councillor Elizabeth Oades proposer; Councillor Charlie Duffy seconder:

“We believe that the evidence base is, in part, flawed in relation to the housing need numbers, housing numbers and employment land assessments and, therefore, cannot be relied upon and that the three areas should be reassessed and corrected.”

2. Councillor Elizabeth Oades proposer; Councillor Charlie Duffy seconder:

“Policy nH3 Affordable Housing – Paragraph two: that the wording of the last sentence be altered to “the provision of affordable housing will be to meet the need for those settlements”. ”

3. Councillor Elizabeth Oades proposer; Councillor Charlie Duffy seconder:

“Maps of land assessed but not included in the Plan. Last two pages: that these sites should be removed from the maps as they give an indication that development would be acceptable in these areas.”

4. Councillor Heather Speak proposer; Councillor Maxine Chew seconder:

Policy GD2, chapter 8, Area of Separation: that this Policy should apply to several areas of the Borough, not just Wrea Green, we would like to see this Policy amended to reflect this.”

5. Councillor Alan Clayton proposer; Councillor Keith Beckett seconder:

“Add the following to the ‘Challenges’ Table on page 199 in relation to “H13 – Land north of Mowbreck Lane, Wesham (housing):”to be deferred subject to the decision of the Secretary of State”.

FINAL RESOLUTION

The final vote saw the Portfolio Holder’s decision endorsed for public consultation but, as will be seen, a significant number of councillors present were unable to support it;

Those voting for the endorsement were (23) Councillors Brenda Ackers, Ben Aitken, Christine Aykroyd, Frank Andrews, Tim Armit, Tim Ashton, Fabian Craig Wilson, David Donaldson, David Eaves, Susan Fazackerley, Tony Ford, Gail Goodman, Nigel Goodrich, Angela Jacques, Cheryll Little, Barbara Nash, Edward Nash, Albert Pounder, Dawn Prestwich, Richard Redcliffe, Thomas Threlfall, Vivienne Willder.

Those voting against the endorsement were (16) Councillors Keith Beckett, Julie Brickles, David Chedd, Maxine Chew, Alan Clayton, John Davies, Charles Duffy, Kath Harper, Howard Henshaw, Karen Henshaw, Paul Hodgson, Linda Nulty, Elizabeth Oades, Louis Rigby, Elaine Silverwood, Heather Speak.

CONCLUSIONS

At the Special Council Meeting, we proposed the above amendments to the Plan before it went to public consultation, but the Conservative Administration at Fylde refused to support those amendments.

In consequence, 41% of Councillors present at the meeting were unable to support, and refused to endorse, the Portfolio Holder’s decision to approve the ‘Fylde Local Plan to 2030: Part 1 – Preferred Options’ for public consultation.

CONSULTATION

This Minority Report has shown how and why the Preferred Options that are now presented do not enjoy broad support from Fylde’s Borough Councillors.

It is issued:

- to assist members of the public in the consultation process;
- to highlight areas of concern that we believe have not been adequately researched and/or addressed;
- to explain why a significant proportion of Councillors voted against its endorsement.

The Plan is now out to public consultation, and events are being held in different areas of the Borough to enable residents to respond.

After the last public consultation many people responded, but a number of the responses were discounted by Fylde as they were not in technical planning parlance.

It is therefore very important that residents make their views known about the Policies in this plan but that they use the correct terminology. Independent/Ratepayer and Liberal Democrat councillors successfully amended the proposed consultation process to ensure that in all methods of consultation, and at every opportunity, full guidance will be provided on the format in which comments should be submitted.

If, however, any resident requires help with this, please contact one of your local councillors who will be pleased to assist.

The following Borough Councillors support this Minority Report:-

**Councillor Keith Beckett
Councillor Julie Brickles
Councillor David Chedd
Councillor Maxine Chew
Councillor Alan Clayton
Councillor Peter Collins
Councillor John Davies
Councillor Charles Duffy
Councillor Peter Hardy
Councillor Kath Harper
Councillor Paul Hayhurst
Councillor Karen Henshaw
Councillor Howard Henshaw
Councillor Paul Hodgson
Councillor Ken Hopwood
Councillor Linda Nulty
Councillor Liz Oades
Councillor Louis Rigby
Councillor Elaine Silverwood
Councillor Heather Speak.**