

# Planning and Affordable Housing Statement

---

**Proposed Local Retail Centre and  
Affordable Housing Development**

**Land to West of Cropper Road,  
Whitehills, FY4 5LB**

**Eden Land & Development with Breck  
Homes**

---

**AUGUST 2021**



**mosaic**  
town planning

<b>Mosaic Town Planning</b> Bloc 17 Marble St. Manchester M2 3AW	Enquiries.: 0161 638 9211 <a href="mailto:enquiries@mosaictownplanning.co.uk">enquiries@mosaictownplanning.co.uk</a>  <a href="http://www.mosaictownplanning.com">www.mosaictownplanning.com</a>
<b>Prepared by:</b>	Paul Williams
<b>Version:</b>	Final
<b>Date of Issue:</b>	17.08.21

# Contents

<b>1</b>	<b>Introduction .....</b>	<b>3</b>
	<b>Submitted Plans and Documents .....</b>	<b>3</b>
	Retail .....	3
	Residential .....	3
<b>2</b>	<b>The Proposals .....</b>	<b>5</b>
	<b>Retail .....</b>	<b>5</b>
	<b>Residential .....</b>	<b>5</b>
	Proposed Affordable Housing Condition .....	6
	Developer Contributions .....	7
<b>3</b>	<b>Site and Surroundings .....</b>	<b>8</b>
<b>4</b>	<b>Relevant Planning History .....</b>	<b>10</b>
<b>5</b>	<b>Planning Policy and Evidence Base .....</b>	<b>11</b>
	<b>National Planning Policy Framework (2021) .....</b>	<b>11</b>
	<b>Local Policy .....</b>	<b>12</b>
	<b>Evidence Base and Background Information .....</b>	<b>15</b>
	Affordable Housing Delivery in Fylde 2015/16 to 2020/21 .....	15
<b>6</b>	<b>Analysis .....</b>	<b>17</b>
	<b>Principle .....</b>	<b>17</b>
	Retail .....	17
	Affordable Housing .....	17
	Relationship to Wider Allocation .....	18
	<b>Development Management Considerations .....</b>	<b>19</b>
	Design and Layout .....	19
	Highways .....	20
	Flood Risk .....	21
	Ground Conditions .....	21
	Ecology .....	21
	Trees .....	22
	Noise .....	22

<b>Presumption in Favour of Sustainable Development .....</b>	<b>22</b>
Economic.....	23
Social.....	23
Environmental.....	23
<b>7 Conclusion.....</b>	<b>25</b>

# 1 Introduction

- 1.1 This Planning Statement and Affordable Housing Statement accompanies two simultaneous applications for Full Planning Permission on immediately adjacent sites at Cropper Road, Blackpool for:
- a local retail centre
  - 65 affordable dwellings
- 1.2 Eden Land and Development is an applicant for both applications, with the residential application also having Breck Home as joint applicant, who will develop the site for a local Registered Provider.
- 1.3 This Statement will describe the proposals in more detail, along with the site and surroundings. It will then consider relevant planning policy, the evidence base and the planning history of the site, before providing an analysis setting out the planning issues relevant to the determination of the applications. It concludes by confirming that the proposals constitute sustainable development in accordance with the development plan and should be approved.

## Submitted Plans and Documents

- 1.4 The applications are accompanied by the following plans:

### Retail

- P01 Retail Proposed Site Layout – Rev C
- P02 Retail Floor Plan – Rev B
- P03 Retail Elevations – Rev A
- P04 Retail Site Location Plan – Rev A
- Topographic Survey
- Tree Removal Plan (retail)

### Residential

- P01 Proposed Site Layout – Rev A
- P02 Materials Distribution Plan
- P03 Boundary Treatments Plan – Rev A
- P04 Boundary Treatments – Rev A
- P05 Site Location Plan – Rev A

- P06 – Maisonettes
- P07 – 2B4P 68 (3 block)
- P08 – 2B4P 68 (4 block)
- P09 – 3B5P 82 (Semi)
- P10 – 3B5P 82 (Semi)
- P11 – 3B4P 80 Aspect (Semi)
- P12 – 3B4P 80 Aspect (3 Block)
- Topographic Survey
- Tree Removal Plan

1.5 The following reports relate to both applications:

- Planning Statement
- Design & Access Statement
- Ecology Assessment / Bat Surveys
- Site Investigation
- Tree Survey and Report
- Noise Assessment
- Flood Risk Assessment
- Transport Statement

1.6 The following reports concern the housing application only:

- Building for Life Evaluation
- Sustainable Drainage Statement
- Utilities Statement
- Waste Management Strategy

## 2 The Proposals

### Retail

- 2.1 The proposed local centre will be adjacent to the Cropper Road frontage and opposite Paddock Close. It will occupy a site of 0.27 hectares and comprise of a single building with a footprint of 649 sq.m. It will be divided into 3 units:
- Unit 1 107 sq.m.
  - Unit 2 107 sq.m.
  - Unit 3 390 sq.m. (245 sq.m. retail floorspace; 145 sq.m. back of house)
- 2.2 Unit 3 is intended to be a convenience store and the two smaller units will be let according to market interest. There is currently a café at the site and this is one example of a use which could occupy a unit in the future.
- 2.3 The single-storey building will be constructed of red brick with a mono-pitch roof. The two small units will have rear yard areas, whilst the convenience store will also have a yard, plant room and bin store adjacent to the back of house area. There is provision for a landscaped buffer adjacent to the proposed housing to the west and for additional landscaping to the site frontage and northern boundary.
- 2.4 Vehicular access would be onto Cropper Road, in a similar location to the existing. The 10.25m wide road will have 4.5m kerbed radii and visibility splays of 2.4m by 43m. There would be a 28-space car park (of which 3 disabled) along with cycle provision. A delivery bay would be provided to the front of the building.

### Residential

- 2.5 The proposed residential development is to the north and west of the local centre, across a 1.63 hectare site. The 65 affordable dwellings will be owned and managed by the local Registered Provider following construction by Breck Homes.
- 2.6 The proposed tenure is 100% affordable, with a flexible mix of affordable rent, rent to buy and shared ownership in accordance with the flexible approach to mixed communities supported by Homes England. The exact split will be determined according to requirements identified by the Registered Provider and actual demand, to be governed by the draft planning condition suggested below. Therefore the mix of tenures shown on the application form should be regarded as purely indicative, as this will be finalised under the terms of the planning condition.
- 2.7 The mix will be as follows:

- 6 x 1-bed 2 person apartments (58 sq.m.)
- 6 x 2-bed 3 person apartments (65 sq.m.)
- 21 x 2-bed 4 person houses (68 sq.m.)
- 7 x 3-bed 4 person houses (80 sq.m.)
- 25 x 3-bed 5 person houses (82 sq.m.)

2.8 The houses would be a mixture of semi-detached dwellings and 3 or 4 unit terraces. The apartments would be of 2 storeys and of a similar scale and appearance to the houses.

2.9 The buildings will be of a traditional design, with the front elevations including detailing such as brick window headers and cills, soldier courses and gables. Plots 58 and 59 will be orientated toward the entrance road to add interest in the street scene. All dwellings will be of red brick and grey tiled roofs, using two alternative palettes of materials as described in the Design & Access Statement.

2.10 Vehicular access would be taken from Cropper Road, in a similar position to the existing Garden Centre access. It will be of typical residential access road dimensions, being 5.5m wide with a 2m footpath either side, 6m radii and visibility splays of 2.4m x 43m.

2.11 The residential portion of the wider scheme also includes:

- 5m right of way /cycle link along northern boundary, linking the site to the proposed residential development to the west and allowing indirect access from there to the local centre
- 3m cycle link at the south-west corner, again integrating the site with adjacent housing
- Flood storage area incorporating green infrastructure along western boundary

#### **Proposed Affordable Housing Condition**

2.12 The applicants request that the provision of affordable housing is required by planning condition rather than a Section 106 Agreement which would create issues over eligibility for grant funding. The purpose of S106 in relation to affordable housing is generally regarded as being to secure the minimum policy requirement applicable to any standard market-led residential development, which would be 30% according to the Local Plans response. Homes England typically regards these units as not eligible for grant funding, on the basis that their provision is an obligation for the developer of a market housing-led scheme and should not receive public subsidy. However, the application of this approach to the current scheme, planned as 100% affordable and utilising Homes England funding for all units from the outset, would make it unviable as a whole and prevent delivery.



2.13 The following condition based on Planning Inspectorate wording would be appropriate for this purpose:

***“The development shall not begin until a scheme for the provision of affordable housing as part of the development has been submitted to and approved in writing by the local planning authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in Annex 2 of the National Planning Policy Framework 2021 or any future guidance that replaces it. The scheme shall include:***

***i. the numbers, type, and tenure of the affordable housing provision to be made which shall consist of 100% of housing units;***

***ii. the arrangements to ensure that such provision is affordable for both first and subsequent occupiers of the affordable housing; and***

***iii. the occupancy criteria to be used for determining the identity of occupiers of the affordable housing and the means by which such occupancy criteria shall be enforced.”***

#### **Developer Contributions**

2.14 As a 100% affordable scheme which is dependent on grant funding, the scheme can only withstand limited developer contributions. In the event that contributions are requested for such matters as education or open space, these will be considered having regard to viability and the legal tests for planning obligations.

### 3 Site and Surroundings

- 3.1 The residential site area is 1.63 hectares and the retail site area is 0.27 hectares.
- 3.2 The majority of the site is currently occupied by a garden centre consisting of glazed buildings of permanent construction, along with polytunnels, displays of temporary buildings for sale and a car park. The premises include a café/restaurant, a pet supplies store, storage, and stables. Much of the site is covered by asphalt and concrete, with a central area of rough grassland and fields within the southern section used for horse grazing. The land is generally flat, with a gentle slope running from the south-west to the north-east corner. A number of trees are present along the northern and western boundaries and in the centre of the site.
- 3.3 The site is a combination of Flood Zones 1, 2 and 3 with areas benefiting from flood defences.



- 3.4 There are two existing vehicular access points from Cropper Road; a rough surfaced track to the southern side of the premises and the more formal two-way access which serves the garden centre car park to the north. Cropper Road is subject to traffic calming, including a build-out with directional prioritisation in front of the site.
- 3.5 The site is surrounded to the north, west and south by generally open land which is subject to current proposals for housing development (see Planning History section). This includes a large detached bungalow, Cropper Lodge, adjacent to the site and fronting Cropper Road to the north. There is a new housing estate on the east side of Cropper Road, the dwellings opposite the site having their rear elevations to the road and being set back behind an elongated ditch.
- 3.6 The site is located on the eastern fringes of the urban area of Blackpool. Clifton Retail Park is 1.5 miles to the north, including a Tesco superstore, Next and Matalan. Blackpool Retail Park is just over 2 miles to the west and includes Morrisons and Aldi foodstores, a range of clothing and household stores and a drive-through restaurant. There is also a B&Q and pub/restaurant 1 mile to the north-east. There are extensive employment premises close by at Whitehills Business Park, which also includes facilities

such as gyms and coffee shops. There are also a number of car showrooms and caravan parks in the surrounding area.

- 3.7 The site is well located for the highway network, with Squires Gate Lane (A5230) and Yeadon Way providing access to Blackpool and the junction of the M55 and Preston New Road (A583) to the north-east. Bus services within the area include the no. 61 bus from Preston to Blackpool which passes through Whitehills and the no. 6 serving DWP Peel Park. The Masterplan for the adjacent housing development will allow for a closer bus route passing through the allocated site. Areas of Blackpool, South Shore, Staining and Lytham St Annes fall within a 5km distance which is typically considered as convenient for cycle journeys. The location of amenities within walking distance is considered within the Transport Statement.

## 4 Relevant Planning History

4.1 The following current application covers land to the west and north of the site, along with a larger parcel to the north-east beyond Cropper Lodge:

- **17/0779 - Land west of Cropper Road:** Outline application for the residential development of up to 350 dwellings together with associated works and infrastructure following demolition of existing buildings and structures (access from Cropper Road and school road a detailed matter and all other matters reserved); validated 11/9/17; delegated approval subject to S106 agreement 29/07/20

This application affects two parcels of land; an 'L' shaped area to the north and west of the Breck Homes housing site and a larger area to the east of Cropper Lodge and fronting onto Cropper Road.

A Masterplan is submitted with this application which includes the two application sites covered by this Planning Statement, together with a Design Code. These are documents produced on behalf of the housebuilder, Wainhomes, and have no formal status in relation to the applications accompanying this Planning Statement.

- **19/0284 - Land at junction of School Road & Bambers Lane:** Residential development of 57 dwellings with associated landscaping and infrastructure including compensatory flood storage area and road link towards Cropper Road

This application does not adjoin the subject application site but is within the same Local Plan housing allocation (see Planning Policy Section); validated 17/04/19; delegated approval subject to S106 agreement 29/07/20

- **21/0472 – Cropper Lodge, Cropper Road:** Erection of 40 dwellings (including 2 affordable homes) and associated internal estate road, on-site open space, flood attenuation area, pumping station, landscaping and other works following demolition of existing bungalow; validated 19/5/21 – Awaiting decision

This application adjoins the Breck Homes application site to the east.

## 5 Planning Policy and Evidence Base

### National Planning Policy Framework (2021)

5.1 The following are of particular relevance:

- Paragraph 8 describes the 3 objectives of sustainable development: economic, social and environmental
- Paragraph 11 states that the presumption in favour of sustainable development means ***“approving development proposals that accord with an up-to-date development plan without delay”***
- Paragraph 60 states that ***“To support the Government’s objective of significantly boosting the supply of housing, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”***
- Paragraph 62 advises that the ***“size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”*** including those who require affordable housing and older people.
- Paragraph 69 identifies how ***“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”***. One way in which local planning authorities can promote the development of a good mix of sites is to ***“work with developers to encourage the sub-division of large sites where this could help speed up the delivery of homes”***.

5.2 Chapter 7 deals with ‘Ensuring the vitality of town centres’ but does not contain policy relevant to an allocated local centre.

5.3 Chapter 8 addresses ‘Promoting healthy and safe communities’ states that to provide the social, recreational and cultural facilities and services the community needs, planning decisions should (amongst other considerations):

- a) Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venue, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments
- e) Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services

- 5.4 Chapter 9 covers Promoting sustainable transport. In considering development proposals, it should be ensured that ***“appropriate opportunities to promote sustainable transport modes can be - of have been – taken up, given the type of development and its location”*** and that ***“safe and suitable access to the site can be achieved for all users”***, amongst other considerations. It is advised that ***“Development should only be prevented or refused on highways grounds of there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe”***.
- 5.5 Planning and flood risk is considered within Chapter 14. Including the application of sequential and exception tests. The exception test may need to be reapplied where more recent information about potential flood risk should be taken into account. Paragraph 167 sets out criteria for considering development proposals in areas at risk of flooding.

## Local Policy

- 5.6 The location of the site is referred to as the Fylde-Blackpool Periphery in the Fylde Local Plan to 2032 (adopted 2018). It is stated that:

***“This area includes the Blackpool Airport Corridor and Whitehills Business Park. Whilst it is located in Fylde Borough, it is adjacent to the boundary with Blackpool, which means that this area has greater connections with Blackpool in terms of character and geographical location. It is likely that existing residents and businesses within this area will continue to rely on Blackpool’s infrastructure, services and facilities.”*** (parag. 2.30)

- ***“Housing schemes have been approved on land at Whitehills, reflecting the sub-regional importance of opportunities on the Fylde–Blackpool Periphery. Whitehills does not have a recognised local shopping centre. Services focused on a local retail centre will be needed for the new community”*** (parag. 2.31)
- ***“The Local Plan should provide for an adequate supply of market and affordable housing.”*** (parag. 2.38)
- ***“The subregional significance of land at Whitehills Business Park to the Fylde Coast economy is recognised and further housing permissions at Whitehills will be discussed through the Duty to Cooperate, as this location is of sub-regional importance for employment land provision. Due to the level of development planned for the Fylde-Blackpool Periphery, it is proposed that a local retail centre be developed on land west of Cropper Road (site HSS5) over the lifetime of the plan.”*** (parag. 2.39)

5.7 **Policy SL2** lists development sites within the **Fylde-Blackpool Periphery Strategic Location for Development**. The site forms part of one of these, **HSS5 – Cropper Road West, Whitehills**, with 250 dwellings expected to be provided within the plan period and commencing in 2023/24. The associated text says:

*“Any planning application for the development of this site will need to be accompanied by a comprehensive masterplan to be agreed by the Council, which will need to include the site for a local (retail) centre, serving Whitehills. There are surface water and wastewater issues at land at Junction 4 of the M55 and road improvements will be required to the junction. However, it is anticipated that development of housing on this site could start in 2023/24, with 250 homes being delivered within the plan period and the remaining 200 being constructed beyond the plan period.”* (parag. 6.17)

5.8 **Policy M1 Masterplanning the Strategic Locations for Development** requires that prospective developers of Strategic Sites (100 or more homes) within the Strategic Locations for Development will be expected to produce a masterplan or design code for their site in consultation with the Council.

5.9 **Policy EC5 Vibrant Town, District and Local Centres** refers to a proposed local centre in Whitehills. The explanation states that a Local Centre is proposed in Whitehills to *“to support the Fylde-Blackpool Periphery Strategic Location for Development.”* The centre is identified *“indicatively”* and *“a range of appropriate services that support the role and function of the Local Centres will be encouraged”*, subject to the criteria applicable to Local Centres in general. The first two criteria are most relevant to a new centre:

a) Planning permission will be granted provided that:

- The proposal would contribute in level, quality or range towards meeting local shopping needs; and
- The proposal would not adversely affect the character of the centre or the amenity of adjoining property; and
- The proposal would not adversely affect the vitality and viability of other nearby existing centres or prejudice future investment in those centres.

b) Premises within Local Centres will be protected and enhanced for retail use (A1). Other uses such as financial and professional services (A2) and Restaurants and Cafes (A3) may be more appropriate to maintain / enhance the vitality and viability of the Local Centre and will be permitted at ground level where:

- The development does not cause undue detriment to the centre’s range of facilities, thereby threatening the centre’s viability and vitality;

- development does not prejudice residential amenity or highway safety.

- 5.10 **H2 Density and Mix of Development:** *“Developments will be expected to make efficient use of land, whilst avoiding detrimental impact on the amenity, character, appearance, distinctiveness and environmental quality of the surrounding area. It is expected that this will normally result in a minimum net residential density of 30 homes per hectare...A broad mix of types and sizes of home, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the Borough as set out in the Fylde Coast Strategic Housing Market Assessment (2014). The mix required will be adjusted according to updated future Housing Needs Assessments over the plan period. All developments of 10 or more dwellings will therefore be required to include at least 50% of dwellings that are 1-, 2- or 3-bedroom homes.”*
- 5.11 **H4 Affordable Housing:** The standard requirement is for a requirement of 30% affordable provision *“The precise requirements for tenure of affordable homes will be negotiated on a case-by-case basis, having regard to the viability of individual sites, local need and compliance with other policies of the plan.”* The policy bases the need for affordable housing on Addendum 1 of the Fylde Coast SHMA 2014, which identifies a net affordable housing need of 249 dwellings. It states that at the end of quarter 3 in 2015/16, there were 945 active applicants registered with My Home Choice Fylde Coast, with an average of 57 applicants bidding for available properties each month. The explanation confirms that *“The figure of 249 per annum would represent a large proportion of the 415 per annum requirement of all housing for Fylde, and this would therefore be undeliverable”*.
- 5.12 The explanation also refers to evidence of need from the SHMA showing that 64% was from 1-bed, 16% for 2-bed, 11% for 3-bed and 9% for 4+ bed.
- 5.13 The following policies are also of potential relevance:
- Policy GD6 Promoting Mixed Use Development: Mixed use development will be encouraged, particularly on strategic sites. The mix of uses could include local retail centres, employment, commercial, leisure, community and recreational uses as well as residential.
  - Policy GD7 Achieving Good Design in Development
  - Policy H1 Housing Delivery and the Allocation of Housing Land
  - Policy H2 Density and Mix of New Residential Development
  - Policy T4 Enhancing Sustainable Transport Choice
  - Policy T5 Parking Standards
  - Policy CL1: Flood Alleviation, Water Quality and Water Efficiency



- Policy CL2: Surface Water Run-Off and Sustainable Drainage
- Policy ENV2 Biodiversity

- 5.14 The **Partial Review of the Fylde Local Plan to 2032** (FLP32) is subject to Main Modifications consultation following Examination Hearings until 9<sup>th</sup> September 2021. Policy H1, as proposed to be altered, provides for a minimum housing requirement of 415 net homes per annum for the period 2011-2019 and a minimum housing requirement of 305 net homes per annum for the period 2019-2032. The delivery of developable sites, which are allocated for housing and mixed use from 1 April 2011 to 31 March 2032 allowances, are to provide for a minimum of 7,275 homes. The explanation indicates that a shortfall in housing completions accrued in the early years of the plan period when large sites were in the planning process and that completions are expected to increase as larger sites commence delivery.
- 5.15 Consultation closed on a **draft Affordable Housing Supplementary Planning Document** in December 2019 and the Council is continuing to work on a final version.

## **Evidence Base and Background Information**

- 5.16 Evidence of affordable housing need comes from the **Fylde Coast Strategic Housing Market Assessment**, originally produced in 2014, and associated addendums. The findings are referred to within policies H2 and H4 above. In addition, Fylde Addendum 3 'Analysis of the OAN in light of the 2014-based SNPP and SNHP' was produced in May 2017 and includes the following:

*The 2013 SHMA identified a need for 207 affordable homes per annum. This was updated in the Addendum 1 report which concluded with a higher modelled need for 249 affordable homes per annum. The draft Local Plan assumes a requirement to deliver 30% affordable housing. Applying this rate of provision to the OAN would suggest that approximately 120 - 130 affordable homes per annum will be able to be provided. Whilst it is apparent that this will not meet the need for affordable housing in full this will represent a significant uplift on the recent historical rates of affordable housing provision, noting that less than 40 affordable dwellings were delivered in Fylde in 2015/16.*

- 5.17 The Council has produced a **Five Year Housing Land Supply Annual Position Statement 2020**, which has been assessed by an Inspector on behalf of the Secretary of State for Housing, Communities and Local Government. This concludes that the authority can demonstrate a housing supply of 5.13 years.

### **Affordable Housing Delivery in Fylde 2015/16 to 2020/21**

- 5.18 This is a report to the Planning Committee of 10<sup>th</sup> March 2021, intended to provide a strategic overview of delivery including that of key schemes.

5.19 It includes the following points of interest:

- The provision of affordable housing in Fylde is considered to be ***“critical in the delivery of sustainable mixed communities”***
- Fylde has the highest overall median house price in Lancashire at £196,995 compared with median earnings of £31,093
- The document continues to use the SHMA affordable requirement of 249 per annum for the remainder of the plan period, indicating that this remains the most up to date figure.
- The Council has traditionally sought 80% affordable rent and 20% intermediate tenures (mainly shared ownership) but found that this acted as a barrier to delivery. It now seeks 50-60% affordable or social rented and 40-50% intermediate tenures, with some flexibility in this. Such flexibility has contributed to a significant increase in delivery, along with contributions from 30% of units on market-led development sites and 100% affordable schemes.
- However, the pandemic has disrupted delivery in 2020/21 with handover dates delayed.
- Eight local providers are named which form part of the Registered Provider Partnership.

5.20 Recent affordable housing delivery is shown in the following table. This shows that, despite the substantial increase achieved, the peak level of delivery has remained below the requirement identified in the SHMA.

TABLE 2 – Affordable Housing delivery	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21
Affordable rent	23	47	77	186	123	41
Shared Ownership	0	18	13	32	90	28
Discounted market sale	0	0	17	14	14	21
<b>TOTAL UNITS DELIVERED</b>	<b>23</b>	<b>65</b>	<b>107</b>	<b>232</b>	<b>227</b>	<b>90</b>

## 6 Analysis

### Principle

#### Retail

- 6.1 Whilst the site is well located for a choice of major retail stores, these are insufficiently close for daily convenience needs, and the growth in housing development within the vicinity reinforces the need for more local provision. The Council has recognised the desirability of additional local retail provision through its allocation of a local centre under Policy EC5. Whilst the proposed centre does not occupy the plot shown on the proposals map, the policy specifies that it is only identified indicatively. It does not identify a minimum site size or the envisaged floorspace. Having undertaken market research and spoken to prospective occupiers, the applicant considers that the indicative site shown is too large in this context and would be unviable. However, he has obtained an expression of interest from a convenience store operator. The larger unit has been designed to accommodate this requirement, whilst the two smaller units would suit a wider variety of end users according to market interest. Typical occupiers would be a café or hairdresser.
- 6.2 The proposed development satisfies the aspirations of the policy, and will complement the full range of retail provision at larger centres in the surrounding area, by catering for the day to day needs of residents who will be able to reach the site on foot.

#### Affordable Housing

- 6.3 The site forms part of a wider housing allocation and so the residential development is clearly acceptable in principle. Whilst it does extend into the area shown as the Local Centre on the local plan proposals map, as noted above this allocation is only indicative and provision of the Centre forms an integral part of the proposals comprising of these simultaneous applications.
- 6.4 There is an annual need of 249 affordable dwellings in Fylde, as identified in the Fylde Coast Strategic Housing Market Assessment 2014 and associated addendums which the Council continues to rely upon as evidenced by the March 2021 committee report referred to above. This is in the context of the highest median house price in Lancashire, and the Council's recognition that affordable housing is critical in the delivery of sustainable mixed communities. Additional information is available from the Committee report on the adjacent site (17/0779), which stated the following in July 2020: ***“There are currently 1443 active applicants registered for re-housing within Fylde Borough. 850 households require 1-bedroom accommodation, 390 households require two bedroom, 173 households require three bedroom and 30 households require 4+ bedrooms. Of those 104 have a priority banding based on their current circumstances.”***

- 6.5 Although the table reproduced on page 16 above shows that the Council achieved a significant increase in affordable provision after 2015/16, this was starting from a low base and provision has been substantially below need across the plan period. The recent peak of 232 remained below the level of need. Whilst the pandemic contributed to the substantial reduction in 2020/21, the cumulative shortfall in provision reinforces the desirability of this scheme for 100% affordable provision.
- 6.6 Regarding the size of units, Policy H4 refers to evidence of need being primarily for smaller units, in particular those of 1 bed. The development includes 6 1-bed dwellings, and the majority of dwellings proposed have either 1 or 2 beds. There is also a significant proportion of 3-bed properties, but no larger 4-bed units proposed. The context is a suburban one in which a high proportion of 1-bed units would not be appropriate, whilst 2 and 3 bedrooms offer more flexibility in use of the dwellings including capacity for a home office as needs have now evolved. The mix has regard to discussions with a local Registered Provider to ensure that it is appropriate.
- 6.7 The scheme has been progressed on the basis of 100% affordable housing and its tenure will be flexible based on identified need and actual demand, which is advocated by Homes England. The Affordable Housing Committee Report referred to at parag. 5.18 notes how such flexibility in tenure has led to increased delivery. Given that demand at the time of occupation may vary from that expected, there would be scope for details submitted under the condition proposed at parag. 2.12 above to reflect this.
- 6.8 With reference to overall housing provision, whilst the Council can demonstrate a 5 year supply, there has been an overall shortfall in delivery across the plan period, pending the delivery of large allocated sites. The proposed development forms part of one such site, but is relatively self-contained and can make an early contribution to housing supply, being developed in a single phase for management by a housing association rather than being delivery being tied to sales rates.

#### **Relationship to Wider Allocation**

- 6.9 Policy M1 states that unless a Masterplan or design code has been prepared by the Council, prospective developers of strategic sites (100 or more homes) within the Strategic Locations for Development should prepare a masterplan or design code for their site. In this case, the Council has not prepared a document and the site is for fewer than 100 homes.
- 6.10 However, an 'Illustrative' Masterplan and Design Code have been prepared on behalf of developers within the wider housing allocation and whilst these do not have formal weight as adopted documents, the Council has accepted the approach by resolving to approve the applications. It should

be noted that the majority of the site including the areas to the north and west of the application site is only covered by an Outline application and that the internal layout can be expected to change.

6.11 With regard to compatibility with the Illustrative Masterplan:

- This shows that the area occupied by the two applications which this Statement accompanies would be used for the same combination of a local centre and residential, although the configuration would differ
- It shows the Local Centre as having an independent access point in the position now proposed for the residential access, whilst the areas shown for housing would have been accessed through Phase 4 of the Wainhomes site. The parties producing the Masterplan did not consult with the landowner of the present application sites in producing these indicative arrangements.
- However, the remainder of the Masterplan area is not proposed to rely upon any vehicular access from the application sites and so its future delivery will not be compromised by the current applications.
- There is a footpath shown as entering the present application sites from the north on the Masterplan. The position of this is inappropriate as it would be blocked by the required flood storage area. However, the proposal provides for 2 alternative pedestrian and/or cycle routes leading to the western boundary, providing for connectivity with the Wainhomes site when its detailed layout is resolved. These will assist residents in reaching the local centre.

## **Development Management Considerations**

### **Design and Layout**

- 6.12 The residential properties are of traditional design and construction using two restrained and complementary palettes of materials which will be appropriate adjacent to the new housing estate already constructed and the forthcoming developments within the allocated site. The layout is based on linear streets with active frontages, including dual-aspect properties at key locations to maintain interest. The Design & Access Statement provides additional information.
- 6.13 The proposed density of 40 dph comfortably exceeds the Council's minimum requirement but is not excessive in this evolving suburban location, particularly as it increased by the inclusion of small apartments rather than reflecting excessive built form.
- 6.14 Each house and ground floor apartment has a private rear garden. A number also have small front gardens or provision for landscaping, and the layout avoid dominance by unrelieved parking provision. The proposed Flood Storage Area parallel to the south-western boundary will be attractively

landscaped and contribute to the visual amenity of residents, whilst a landscaped site frontage will allow for tree planting to Cropper Road.

- 6.15 The proposed development will not compromise the Masterplan proposed by the adjacent developers within the wider housing allocation, which will provide public open space including a Multi-Use Games Area accessible from the present application site.
- 6.16 The local retail centre will have a modest and functional design, complementary to a fundamentally residential in terms of scale and materials. The Design & Access Statement refers to a comparable scheme which the applicants have developed in the adjacent Wyre local authority area. The location of the car park and delivery area at the site frontage segregates the associated activity from the proposed residential development. However, the frontage will not detract from Cropper Road as there will be landscaping at the frontage and the car park it is not a large expanse, so that the retail unit frontages will be relatively near to the highway.

### Highways

- 6.17 The Transport Statement concludes that the proposed development will be accessed by safe and efficient vehicular access arrangements from Cropper Road and would be accessible by non-car travel modes of such as walking, cycling and public transport, complementing the wider masterplan proposals.
- 6.18 It also finds that the development proposals will provide adequate parking provision, with adequate servicing accessibility for the commercial element.
- 6.19 The Statement estimates that the proposed residential development would generate an additional vehicular movement every 2 minutes even during the busiest time of day, which will be reduced by factoring in the removal of the existing uses of the site. The local centre is proposed to serve a local catchment as part of the proposed urban extension, so that a high proportion of trips will be on foot or linked to existing trips such as on the way home from work. The Statement concludes that these uses will not generate any material new levels of flow onto the local highway network.
- 6.20 There will also be a substantial reduction in traffic flows on this part of Cropper Road when the Link Road proposed as part of the remaining HSS5 site, as well as from the implementation of the Heyhouses Link Road programmed to be opened in 2023/24.
- 6.21 Accident analysis suggests that the vicinity of the site does not have an unduly poor safety record and it is highly unlikely this situation will be materially worsened as a consequence of the development proposals.
- 6.22 It can therefore be concluded that the proposals are acceptable in highway terms.

### Flood Risk

- 6.23 According to the Flood Map for Planning, the proposed development site is located within flood zones 1, 2 and 3. However site-specific hydraulic modelling, approved by the Environment Agency in October 2020, confirms that the site is actually located outside of the flood extent of the present day 1 in 1000 Annual Exceedance Probability (AEP) event, and is therefore located entirely in flood zone 1. The modelling also confirms that the site would not flood during the 1 in 100 APE event including a 30%, 35% and 70% climate change allowance.
- 6.24 Environment Agency mapping indicates that the site is at a Very Low risk of surface water flooding and that the site is not at risk of flooding from reservoirs. The site is also assessed to not be at risk of flooding from canals or other artificial sources. The site is assessed to be at a negligible risk of groundwater flooding.
- 6.25 The submitted Flood Risk Assessment demonstrates that the proposed development would accord with policy requirements, subject to finished floor levels being set at a minimum of 3.42 m above ordnance datum (AOD) and not less than 0.15 m above adjacent ground levels.
- 6.26 The Assessment also confirms that the proposals would not impact flood risk elsewhere.

### Ground Conditions

- 6.27 The site was greenfield in nature until the existing garden centre / nurseries and other buildings were constructed around 2003. Ponds were also recorded in the south-western site section between 2003 and 2005 which appear to have been infilled. The site has remained relatively unchanged since.
- 6.28 Potential ground gas sources have been identified on and in the vicinity of the site including Made Ground deposits (infilled ponds), peat, and an extensive landfill. Therefore, the risk is deemed low to moderate. Consequently, it is recommended to install ground gas monitoring wells and undertake monitoring over a period of 3 months, with a minimum of 6 visits to confirm the ground gas regime.
- 6.29 Ground investigation works should be undertaken to ascertain the ground conditions and determine the extent and thickness of any geotechnically poor materials, including Made Ground and peat. The design of the proposed development, drainage, services and immediate external areas can only be undertaken upon understanding the ground conditions at the site. If the Phase 2 ground investigation work identifies a potential risk and / or a requirement for further detailed site specific assessment, a Phase 3 environmental investigation report and / or a Remedial Strategy may be required.

### Ecology

- 6.30 The ecological constraints identified during the surveys were as follows:
- Great Crested Newts – no additional survey work or measures recommended.

- Breeding birds – site clearance, tree felling, demolition works, arboricultural works and vegetation clearance are to take place outside of the breeding bird season and should not be undertaken from March to August inclusive.
- Hedgerows and trees – where not retained to be replaced as part of a detailed landscaping scheme.
- Bats - two buildings were assessed as having low potential to support bats. In a follow-up bat presence / absence survey, no bats were found to be roosting within the buildings by the surveyors on site.

### Trees

- 6.31 The submitted tree survey shows that there are no category A or B1 trees present, and that the majority are category C1 and of low value. The best specimens are a group of Balsam Poplars which are only category B2 and found not to be compatible with residential infrastructure.
- 6.32 We therefore conclude that existing trees should not be regarded as a constraint on the proposed development, which will provide opportunities for replacement and enhanced provision.

### Noise

- 6.33 The submitted Noise Assessment finds that the site is not particularly noisy, with traffic on the surrounding roads and occasional aircraft movements creating moderate amounts of noise.
- 6.34 Day time external noise levels are at, or just above, the lower 51 dB LAeq, 16h guideline noise level suggested in BS 8233 and no mitigation will be required with respect to protection of external amenity areas. With windows both open and closed, internal ambient (LAeq) noise levels are suitable for the protection of residential amenity in all habitable rooms, assuming the use of standard thermal double-glazed units. Suitable internal noise levels can be achieved in all habitable rooms with no specific noise mitigation measures required.
- 6.35 At this stage it is not possible to predict the noise that might arise from the commercial uses on the site. One potential source would be from the operation of fixed plant equipment, installed on the outside of the commercial buildings, running during the night-time. Data in Table 2 of the Noise Assessment provides ‘modal’ night-time background (dB LA90) noise levels, which can be used to formulate a planning condition to set permissible operational noise limits for the equipment as measured at the nearest houses.

### **Presumption in Favour of Sustainable Development**

- 6.36 Having regard to paragraph 8 of the Framework, the three objectives can be assessed as follows:



### Economic

- 6.37 The retail units will provide an opportunity for local businesses to become established or relocate. In combination with the associated supply chain, they will create direct and indirect employment.
- 6.38 Housebuilding also plays a significant role in creating and supporting employment. This includes people directly employed by developers and their contractors, as well as employees supported in the wider supply chain and in the wider economy.
- 6.39 In addition, housebuilding delivers economic benefits for local authorities through financial receipts generated in the form of New Homes Bonus payments and ongoing Council Tax. Occupants of the homes will provide long-term support for local services and facilities.
- 6.40 The provision of affordable housing will contribute to the diversity of the housing stock and help to attract and retain a labour force to the benefit of local employers. This is a particular benefit in close proximity to sources of employment within the Fylde-Blackpool Periphery Strategic Location, notably Whitehills Business Park.

### Social

- 6.41 In terms of the social objective, an additional 65 dwellings will contribute to overall housing delivery, which has been delayed pending large allocated sites coming forward. In particular, it will help to address the persistent shortfall in affordable housing provision compared with the annual need of 249 dwellings. The combination of affordable tenures and dwelling types and sizes will help to satisfy a range of affordable need.
- 6.42 The provision of a local centre will also support a strong, vibrant and healthy community by providing accessible facilities.

### Environmental

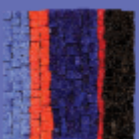
- 6.43 Turning to the environmental objective of sustainability, the development involves an under-used brownfield site within a planned urban extension which is surrounded by existing or planned development. The proposed layout and mix of uses make efficient use of the site without compromising environmental quality.
- 6.44 The local retail centre will help to reduce the need to travel by ensuring that daily needs can be catered for locally, for the benefit of existing and future residents. The proposals provide for pedestrian and cycle connectivity with the rest of the housing allocation, within which a link road has been designed to accommodate additional bus services to further increase the sustainability of the location.
- 6.45 Whilst supplementary ground investigations are required to follow the main report, there is no indication of any abnormal risk which cannot be mitigated as part of routine site development process.

Similarly, there are no noise issues at the site which cannot be resolved by a straightforward condition to control plant serving the retail units.

- 6.46 The submitted Flood Risk Assessment has confirmed that, in practical terms, the site should be regarded as Flood Zone 1 and at low risk of flooding, whilst reports addressing existing trees and ecology confirm that these do not provide significant constraints. The proposed flood storage area, together with landscaped buffers at the site frontage and between the retail and housing areas, provide opportunities to provide high quality planting schemes of ecological benefit.

## 7 Conclusion

- 7.1 With regard to the application of the presumption in favour of sustainable development, we have demonstrated that the proposals accord with an up-to-date development plan.
- 7.2 The overall site is part of housing allocation HSS5 Cropper Road West, Whitehills, and the indicative retail designation within this confirms that the local retail centre is acceptable in principle under Policy EC5. The proposal will make efficient use of previously developed and under-used land to both provide accessible shops to serve the day-to-day needs of the community and address under the shortfall in affordable housing provision. The site will make an early contribution to affordable delivery with the support of Homes England funding.
- 7.3 Having regard to our assessment of the economic, social and environmental impacts of the development and subject to mitigation where required, the application will constitute sustainable development. It should therefore be approved without delay in accordance with paragraph 11 c) of the National Planning Policy Framework.



mosaic  
town planning

[www.mosaictownplanning.com](http://www.mosaictownplanning.com)

© Mosaic Town Planning Ltd.