



FYLDE BOROUGH COUNCIL



## Meeting Agenda

**Planning Policy Scrutiny Committee**  
**Town Hall, St Annes**  
**8 June 2006, 7.00pm**

# **PLANNING POLICY SCRUTINY COMMITTEE**

## **MEMBERSHIP**

CHAIRMAN - Councillor Kevin Eastham  
VICE-CHAIRMAN – Councillor Colin Walton

### **Councillors**

Harold Butler	George Caldwell
Barbara Pagett	William Thompson
John Bennett	Heather Speak
Trevor Fiddler	

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## **CORPORATE OBJECTIVES**

The Council's investment and activities are focused on achieving our five key objectives which aim to :

- Conserve, protect and enhance the quality of the Fylde natural and built environment
- Work with partners to help maintain safe communities in which individuals and businesses can thrive
- Stimulate strong economic prosperity and regeneration within a diverse and vibrant economic environment
- Improve access to good quality local housing and promote the health and wellbeing and equality of opportunity of all people in the Borough
- Ensure we are an efficient and effective council.

## **CORE VALUES**

In striving to achieve these objectives we have adopted a number of key values which underpin everything we do :

- Provide equal access to services whether you live in town, village or countryside,
- Provide effective leadership for the community,
- Value our staff and create a 'can do' culture,
- Work effectively through partnerships,
- Strive to achieve 'more with less'.



## A G E N D A

### PART I - MATTERS DELEGATED TO COMMITTEE

ITEM	PAGE
1. <b>DECLARATIONS OF INTEREST:</b> <i>In accordance with the Council's Code of Conduct, members are reminded that any personal/prejudicial interests should be declared as required by the Council's Code of Conduct adopted in accordance with the Local Government Act 2000.</i>	4
2. <b>CONFIRMATION OF MINUTES:</b> <i>To confirm as a correct record the Minutes of the Planning Policy Scrutiny Committee held on 13 April 2006.</i>	4
3. <b>SUBSTITUTE MEMBERS:</b> <i>Details of any substitute members notified in accordance with council procedure rule 25.3</i>	4
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# REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	8 <sup>TH</sup> JUNE 2006	4

## ENLARGEMENT AND REPLACEMENT OF RURAL DWELLINGS

### Public/Exempt item

This item is for consideration in the public part of the meeting.

### Summary

The report reviews the validity and appropriateness of Policy HL4 of the Fylde Borough Local Plan (As altered) (Oct 2005).

The report is presented to Committee to consider whether the policy needs to be amended or deleted from the local plan.

### Recommendation/s

1. It is recommended that there is no need to amend or delete Policy HL4.

Cabinet Portfolio Development and Regeneration ([Councillor](#) Roger Small)

## **Report**

### **Background**

This report is brought at this time in response to an issue arising from the debate at the Development Control meeting on the 24<sup>th</sup> May 2006. In particular it was questioned whether Policy HL4 was still relevant in the light of some decisions (over time) which were perceived to have been taken contrary to the policy.

The policy in question has been contained in all previous editions of the Fylde Borough Local Plan as indicated:

Plan adopted March 1994 (Policy HL7)

Plan adopted May 2003 (Policy HL6)

Alterations Review adopted October 2005 (Policy HL4)

### **Current Consideration**

The purpose of the policy is to prevent over-large and ostentatious houses in the countryside where such development would prejudice the character of the countryside by imposing a form of development which is alien and non-traditional.

Policy HL4 reads:

**PROPOSALS TO ENLARGE SUBSTANTIALLY OR TO REPLACE AN EXISTING DWELLING WITH ANOTHER SUBSTANTIALLY LARGER DWELLING WILL NOT BE PERMITTED IN COUNTRYSIDE AREAS WHERE THE RESULTING DEVELOPMENT, BY VIRTUE OF ITS SCALE, DESIGN OR MATERIALS WOULD BE OUT OF KEEPING WITH THE RURAL CHARACTER OF THE AREA OR OTHER TRADITIONAL DWELLINGS IN THE LOCATION.**

The reasoned justification indicates that 'modest' extensions and replacements would normally be acceptable when carried out in the right way. 'Modest' is defined as not exceeding 25% of the volume of the original premises but in no circumstances exceeding 33%.

By inference, anything above a 25 – 33% increase is considered 'substantial' and the policy applies to these 'substantial' extensions or replacements.

The policy does not presume against **all** substantial extensions or replacement dwellings.

It only presumes only against those proposals that would, in terms of scale, design or materials, **either**:

- be out of keeping with the rural character of the area; or
- be out of keeping with other traditional dwellings in the location.

On the basis (it is assumed) that neither officers nor members would want to allow substantial extensions or replacements which **would** be out of keeping with the area or other traditional dwellings, it is submitted that the intention and wording of the policy is sound.

It is the interpretation of the policy initially by officers and subsequently by members which will determine the value of the policy. Consistency of decision making is key in this respect and will depend ultimately on subjective judgements.

There may be circumstances where substantial extensions or replacements would be appropriate because they do not offend the character of the area or other smaller traditional dwellings. The proposal at 'The Hill', Westby on the last DC Committee agenda was one such application where both officers and members agreed that these interests would not be harmed.

On this occasion therefore the decision to permit the proposal was in accordance with the policy, and not in breach of the policy.

On this basis it is recommended that the wording of the policy is adequate and does not need to be amended or deleted.

What is needed is consistent interpretation of the policy by both officers and members in a way which demonstrates, to an outsider, that decisions are being made on a fair and equitable basis, taking into account only the planning merits of the case as identified in the policy.

Implications	
Finance	No direct implications
Legal	No direct implications
Community Safety	No direct implications
Human Rights and Equalities	No direct implications
Sustainability	The correct interpretation of Policy HL4 has a direct relationship with the achievement of sustainable development.
Health & Safety and Risk Management	No direct implications

Report Author	Tel	Date	Doc ID
Tony Donnelly	(01253) 658610	May 2006	

List of Background Papers			
Name of document	Date	Where available for inspection	
Fylde Borough Local Plan	Oct 2005	Local Plans Section, Town Hall, St Annes	

### **Attached documents**

None



# REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	8 <sup>TH</sup> JUNE 2006	5

## SUBMITTED DRAFT REGIONAL SPATIAL STRATEGY

For the North West of England

### Public/Exempt item

This item is for consideration in the public part of the meeting.

### Summary

Committee is asked to consider the content of the draft Regional Spatial Strategy (RSS) which was submitted to the Secretary of State by the North West Regional Assembly in January 2006.

The draft RSS has now been formally put on deposit for consultation purposes so that stakeholders can make formal representations on the document.

The deadline for representations is 12<sup>th</sup> June 2006. As such the item had to be referred to Cabinet in advance of reference to this Committee.

### Recommendation/s

1. That Committee endorses the recommendations contained within the main text of the report.

( The recommendations as set out have already been endorsed by Cabinet)

**Cabinet Portfolio Development and Regeneration** ([Councillor](#) Roger Small)

## **Report**

### **Consideration by Cabinet**

Because of the time-scales involved, it was not possible to prepare a report for this Committee in advance of its consideration by Cabinet, which considered the report at its meeting on the 10<sup>th</sup> May 2006. At that meeting the Cabinet endorsed all the recommendations contained in the report.

If this Committee takes a different view on any matter(s) from Cabinet, resolution of the issue will be through the decision of the portfolio holder for Development and Regeneration, Cllr Roger Small.

### **Introduction**

The current Regional Spatial Strategy (formerly known as Regional Planning Guidance) was published by the Government Office for the North West (GONW) in March 2003. This has a time-scale till 2016. The main thrust of the current RSS is that development should be concentrated in the Greater Manchester and Merseyside conurbations and particularly in their urban cores. This is to help promote structural regeneration and urban renaissance in these areas many parts of which are suffering serious social and economic problems.

A new RSS is being prepared and the North West Regional Assembly undertook a consultation exercise in October 2005 on an Interim Draft. This was considered by this Council's former Executive Committee in November 2005. The current stage is a more formal public consultation stage.

The new RSS will provide the broad development strategy for the Region, for the next fifteen to twenty years. Incorporating the regional transport strategy (RTS), RSS identifies the scale and distribution of housing development and the priorities for the environment, transport, infrastructure, economic development, agriculture, minerals, waste treatment and disposal.

The RSS is a statutory document and forms part of the development plan and thus will guide both local authority plan making within the new Local Development Framework and development control decisions.

The RSS has taken into account the provisions of the Regional Housing Strategy (RHS) and the Regional Economic Strategy (RES).

### **RSS Structure**

The structure of the document has been changed and simplified since the interim draft stage. The full structure is shown in the Appendix to this report. References to the comments made at the last consultation stage have not been included in this report except in relation to the two main land allocation policies (housing and employment land).

Parts 2, 3 and 4 contain the main elements of the document and it is these parts that are addressed in this report.

- Part 2 contains the Regional Development Framework;
- Part 3 contains the Regional Policy Framework;

- Part 4 contains the Sub-regional Policy Frameworks (including that for the Central Lancashire City Region).

Selected policies with a specific or direct relevance to Fylde Borough have been highlighted for comment in the report.

### The Regional Development Framework

This part which contains just six policies identifies the spatial strategy and seeks to steer development to the most sustainable locations within the region's cities, towns and other settlements. It makes the most of existing and planned transport networks to ensure that any increases in journeys to work, pollution and congestion are manageable.

Policy DP1– Regional Development Principles: provides a general framework to:

- Make more sustainable and transparent decisions;
- Make better use of land, buildings and infrastructure;
- Ensure quality in development; and
- Tackle climate change.

Recommendation: No objection be raised to this policy.

Policy RDF1 - Main Development Locations: indicates that most new development will be within the urban areas of;

- the Regional Centres (Manchester and Liverpool);
- the Regional Towns and Cities (in the Central Lancashire City Region: Blackburn, Blackpool, Burnley and Preston).

Recommendation: No objection be raised to this policy.

Policy RDF2 – Key Service Centres: identifies Key Service Centres (or their equivalent) listed in structure plans and requires that the list be reviewed against two criteria within the LDF process. These are that they have:

- the potential to act as service centres for surrounding villages and rural areas providing a range of services and facilities;
- good public transport links or the potential for their development into their respective hinterlands.

In Fylde Borough Kirkham/Wesham and Lytham/St Annes are defined as Key Service Centres.

Comment: Whilst Kirkham/Wesham was identified in the Joint Lancashire Structure Plan as a 'Key Service Centre', Lytham St Annes was identified under Policy 2 as a 'Principal Urban Area along with Blackpool/Thornton/Cleveleys/Fleetwood'. This status is not equivalent to a Key Service Centre. In particular, Lytham St Annes is a major town with a wide range of services and facilities.

The way the hierarchy of settlements has been identified in RSS (i.e. within three tiers) is inadequate since it is not broad enough to adequately reflect and distinguish between the range of size and function of towns.

There is a need for an additional category of settlement between the 'Regional Towns and Cities' and 'Key Service Centres' into which Lytham St Annes should be placed.

It is also noted that Fleetwood/Thornton/Cleveleys is not included in the settlement hierarchy at all.

Recommendation: An objection should be raised to the above matters.

Policy RDF3 - Rural Areas: indicates that:

- development should be concentrated within the Key Service Centres;
- in areas adjacent to regional centres, towns and cities, advantage should be taken of the proximity in providing services, employment and a more diverse economic base.

Comment: Whilst the first part is supported, the wording of the second part is far too open to interpretation. It has no specific meaning. This is important in Fylde since the rural areas around Blackpool and Preston would fall within this policy.

Also, the policy for 'Key Service Centres conflicts with the Policy CLCR3 as follows:

#### *Policy RDF3*

*"Development in rural areas should be concentrated within Key Service Centres and should be of a scale and nature appropriate to fulfil the needs of local communities for housing, employment and services, and to enhance the quality of rural life."*

#### *Policy CLCR3*

*"Development in settlements outside the regional towns and city will be appropriate to the scale and function of each settlement."*

These two policies relate to the same settlements and therefore provide two definitions for the appropriate scale and type of development.

Recommendation: Objections should be raised to these matters.

Policy RDF4 – The Coast: indicates inter alia that:

- The economic importance of the coast should be enhanced and regenerated but having regard for its natural, built and cultural heritage assets.

- Development should be directed to the developed coast;
- The undeveloped and remote coast should be safeguarded;
- The functional integrity of bays, estuaries and the inter-tidal areas should be protected;
- The conservation and enhancement of the cultural, historical and natural environmental assets should be promoted.

Recommendation: No objection be raised to this policy.

Policy RDF5 – Green Belts: indicates that:

- there is no need for any exceptional substantial strategic change to Green Belt boundaries before 2011 (in Lancashire);
- the need for any small-scale change should be examined through the LDF process.

Comment: The lower case text to this policy acknowledges that there may be need to undertake small scale detailed boundary changes through the LDF process to meet exceptional circumstances for example, to meet operational aviation related infrastructure requirements at Liverpool and Manchester Airports. No mention is made of the possible need to relax Green Belt boundaries at Blackpool Airport to accommodate operational development. Although the Manchester/Liverpool reference is only included as an example, it may be pertinent to ask that the lower case text includes a reference to Blackpool Airport for the avoidance of doubt.

Recommendation: An objection should be submitted to seek this change.

### Regional Policy Framework

This part of the document contains four chapters addressing working, living, transport and enjoying/managing.

### Working

Policy W1 – Strengthening the Regional Economy: indicates that:

- the economy of the North West will be strengthened by building on the region's strengths, particularly the three city regions of Manchester, Liverpool and Central Lancashire;

- in the Central Lancashire City Region emphasis is placed on advanced manufacturing and engineering, environmental and biomedical technologies, tourism and conferencing.

Recommendation: No objection be raised to this policy.

Policy W3 – Supply of Sub-regional and Local Employment Land: indicates that:

- a supply of land should be provided through a comprehensive review of sub-regional and local commitments to secure a portfolio of sites. The figures for land provision are provided at county level only and thus will require individual local authorities and their partners to agree the local distribution of land;
- there may need to be a re-balancing of provision between B1/B2 and B8 Uses mainly away from general industrial uses as the North West economy modernises. .

Comment: In the last version of the plan, the policy advocated the maintenance of a fifteen years supply of employment land having regard to past take-up rates. Clarification was requested on the way supply should be calculated.

The approach in the current version has been completely changed and lays additional responsibilities on the districts to agree the detailed land allocation figures which are provided for the Lancashire County area as a whole. As such there must subsequently be a two stage process to determine how the county figure is broken down into the various county sub-regions and then how that figure is distributed into the constituent district council areas.

Whilst the policy considers the supply of *sub-regional* and *local* employment land, there is no definition regarding the distinction between the two types.

The requirement to undertake sub-regional reviews of industrial land before commencing work on a development plan document is a new element which was not included at the previous stage.

In the case of Fylde, the requirement to undertake a sub-regional as well as local review of employment land could well compromise the Council's plans to undertake a 'Business and Industrial Land Allocation Policies DPD' in terms of its published time-scale within the Local Development Scheme. This is because no sub-regional review is currently being and would involve (at best) a significant delay in the project.

Recommendation: Objections should be raised to:

- the 'delegation' of responsibilities to determine the sub-regional and local element of employment land allocations to the districts and other partners. This could take a significant amount of additional time;
- the lack of definitions of 'sub-regional' and 'local' employment land;
- the immediate 'requirement' for sub-regional reviews to be carried out in all cases including where council's are already committed to undertaking DPDs on a district basis within their approved local development schemes. The requirement for joint reviews should indicate that this is the 'ideal' as the LDF process becomes embedded through time.

Policy W4 – Release of Allocated Employment Land: acknowledges that:

- some sites may have to be de-allocated from employment use to other uses through a comprehensive review of commitments (Policy W3);
- but outside such a comprehensive review, there should be a presumption against the release of employment land for other uses.

Recommendation: No objection be raised to this policy.

Policy W5 – Retail Development:

- promotes retail development having regard to the hierarchy of centres.
- presumes against new out-of-centre regional or sub-regional comparison retailing developments.
- is silent on the matter of convenience retailing (food shopping) but indicates that this may be considered in future reviews.

Recommendation: No objection be raised to this policy.

Policy W6 – Tourism and the Visitor Economy: focuses on:

- the regeneration of Blackpool and other coastal resorts;
- the regional centres of Manchester and Liverpool and the regional city of Preston;
- other towns and cities;
- the Lake District;
- the rural areas.

Comment: The policy does not define the list of 'other coastal resorts'. This is left to a footnote. Although the definition in the footnote includes St Annes and Lytham, it is felt that the settlements should be listed in the policy itself. More emphasis should be placed on the linkage and value of the coastal resorts together than on the primacy of Blackpool with other resorts given less importance.

Recommendation: An objection should be raised to the policy in respect of the above matter.

Policy W8 – Regional Casinos: identifies Blackpool as the priority location for regional casino development and the development of a casino cluster in the resort core.

Recommendation: This policy be supported.

### Living

Policy L2 – Understanding Housing Markets: requires local authorities to undertake sub-regional market assessment of housing need in order to adopt a comprehensive approach to:

- influencing housing supply across all types, sizes, tenures and values of houses;
- improving the quality of housing;
- supporting housing market restructuring and renewal;
- overcoming issues of affordability;
- ensuring the needs of the wider population are met, including ageing populations and black and minority ethnic communities.

Comment: This policy is based on the requirements of draft PPS3 to which the Council has objected. The requirement to fully understand the sub-regional housing market and take comprehensive steps to influence its operation is considered to be beyond the scope of what could reasonably be achieved with planning powers. However, since this is emerging government policy, it is unlikely that an objection would meet with any success.

Recommendation: No objection be raised to this policy.

Policy L4 – Regional Housing Provision: indicates:

- district based housing figures (an annual average of 306 dwellings in Fylde Borough). This compares with a figure of 333 in the interim draft;
- a requirement to ensure that provision in one area does not result in an adverse cumulative impact on the housing stock and market in another, including adjoining districts;
- a requirement to maximise the use of brownfield land;
- a requirement to reduce vacancy rates to 3%.

In relation to the Fylde Peninsula, the focus will be on support for regeneration and the potential for economic growth in Blackpool and Fleetwood, whilst ensuring that local and affordable housing needs can be met elsewhere in the area.

Comment: At the last consultation stage, the indicated average housing provision figure was 333 dwellings per annum. On the basis of an objection submitted by the Council a lower figure of 306 per annum is now included. This compares with:



- 155 dwellings pa provided for in the current Joint Lancashire Structure Plan;
- 254 dwellings pa average actual dwelling completions since 2001;
- 148 dwellings pa average actual dwelling completions on previously developed land since 2001.

Based on this last statistic, the housing provision figure implies a possible requirement for the release of about 47 hectares of greenfield land to accommodate about 1400 dwellings assuming 30 dph.

The latter figure of 1400 is perhaps best put into context by comparing it with the capacity of the greenfield sites formerly proposed for allocation in the Local Plan. These accounted for some 920 dwellings.

On this consideration the former local plan sites (if selected for re-allocation) would provide for about 66% of the need for greenfield sites for housing in the period to 2021. Other significant greenfield options would be needed and could largely be restricted to Hey Houses, St Annes and in the general area around the end of the M55 motorway. Members should bear in mind however that housing land would be released progressively over the next 16 years, under plan, monitor and manage arrangements. The figures also pre-suppose that additional brownfield resources are not found within new urban potential studies.

The approach also firmly points towards joint working with Blackpool and Wyre Councils on housing land allocation matters. This includes a provision where the dwellings required by one district may be built in another where the options presented point to this solution on the grounds of sustainability.

Although the distribution of regional housing provision is made on annual average figures, paragraph 9.20 indicates that the average annual figures are to be achieved during the overall period covered by the RSS, from 2003 to 2021. This seems to moving away from plan, monitor and manage towards the old approach of predict and provide.

There is much uncertainty in relation to this policy because of the 'requirement' to approach housing issues on a sub-regional basis, to make allocations having regard to provision outside the borough and because the government's advice on related matters has not yet been finally published.

Recommendation: It is felt that clearer guidance should be provided relating to the release/phasing of housing sites contained in paragraph 9.20. An objection should be raised on this issue.

Policy L5 – Affordable Housing : indicates that :

- the requirements for affordable housing, including the location, size and types should be set out in plans and strategies ;
- the greatest need will be in a number of areas including parts of the Fylde peninsula.

Recommendation: This policy be supported.

## Transport

Policy RT31 – Airports : indicates that :

- the economic activity generated by the regions airports should be supported ;
- the future operational and infrastructure requirements, surface access demands and environmental impacts should be identified for Manchester, Liverpool and Blackpool airports, in airport masterplans and other relevant plans and strategies.

Recommendation: This policy be supported. The Council has already within the local development scheme that it is to undertake an Area Action Plan for Blackpool Airport.

Policy RT4 – Ports : indicates that :

- the economic activity generated and sustained by the regions major ports should be supported ;
- surface access plans should be developed to accommodate existing and projected freight and passenger traffic through the regions ports including Fleetwood.

Recommendation: This policy be supported.

Policy RT6 – Parking Policy and Provision : indicates that :

- local authorities should develop a co-ordinated approach to the use of parking charges, enforcement and provision;
- maximum parking standards should be incorporated in plans that do not exceed the regional ceilings set out in the RSS ;
- manage car use by implementing travel plans ;
- make greater use of on-street parking controls.

Recommendation: No objection be raised to this policy.

Policy RT8 – Regional Priorities for Transport Investment and Management: indicates that the general priorities in order of importance are:

- improving transport safety and security;

- maintaining existing transport networks and assets;
- making best use of existing transport networks and assets;
- targeted investment in accordance with the priorities set out in Table 10.2.

Table 10.2 prioritises some 82 major schemes under the following headings:

- Committed Schemes;
- Schemes within the Regional Funding Allocation Programme;
- Schemes within the Regional Funding Allocation Programme (Contingency Schemes);
- First Priority Interventions Under or Proposed for Investigation;
- Second Priority Interventions Under or Proposed for Investigation;

Blackpool & Fleetwood Tramway Upgrade Phase 1 is identified at No 20 under the second heading with a likely start date of 2006/07.

Fylde Coast Public Transport Improvements is identified at No 48 under the third heading with a likely start date of post 2015.

The M55 to Norcross Highway Improvement (New Route) is identified at No 72 under the last heading (under investigation) with a likely start date indicated as post 2021.

Recommendation: The priority afforded to the last scheme should be raised in view of its importance to the north of Fylde Borough, the port of Fleetwood and in relation to the proposed development of the 'Strategic Location for Development' at Fleetwood (Docks at North East Thornton) (Policy 3 of the JLSP).

### Enjoying and Managing

Policy EM4 – Regional Parks ; indicates that three areas of search for Regional Parks have been identified :

- the North West coast ;
- the Mersey Basin ; and
- East Lancashire

The NWRA will work with partners to prepare a strategic framework for each area of search to provide the context for the delivery of Regional Parks in the area.

Recommendation: This policy be supported.

Policy EM6 – Managing the North West’s Coastline : indicates that there should be a strategic and integrated approach to the long term management of flood and coastal erosion risk by :

- taking account of natural coastal change and the likely impact of climate change ;
- making provision for mitigation of and adaptation to natural coastal change and the predicted effects of climate change over the medium to long term ;
- minimising the loss of coastal habitats and avoiding damage to coastal processes.

Recommendation: No objection be raised to this policy.

#### Sub-Regional Policy Framework for the Central Lancashire City Region

The main foci of the Central Lancashire City Region are the regional towns of Blackburn, Blackpool and Burnley and the City of Preston. It’s influence, as broadly defined in The Northern Way, extends out to the local authority areas that stretch from the Irish Sea to The Pennines.

Policy CLCR1 – Central Lancashire City Region Priorities: indicates that plans and strategies will:

- raise economic performance through :
  - development and implementation of the Preston City Vision ;
  - regeneration of the East Lancashire economy ;
  - development of advanced manufacturing/aerospace industries and other knowledge based industries ;
  - tourism based regeneration, particularly through the Blackpool Masterplan.
- provide a portfolio of regional investment sites and knowledge nuclei sites ;
- develop the role of Blackpool Airport ;
- develop the role of Preston as the City Region’s transport gateway.

Recommendation: This policy appears to be essentially urban based. There is no reference to the role to be played by the rural areas in raising economic performance. An objection should be submitted.

Policy CLCR2 – Focus for Growth in Central Lancashire City Region: indicates that development will be located primarily :

- in the regional City of Preston
- and the three regional towns of Blackburn, Blackpool and Burnley.

Recommendation: The policy is unclear as to whether references to particular towns relates necessarily to their administrative boundaries or to some wider more general definition which includes parts of other district council areas. An objection should be lodged to seek clarification on this matter.

Policy CLCR3 – Development in other parts of the Central Lancashire City Region: indicates that: development in settlements outside the regional towns and city will be appropriate to the scale and function of each settlement.

Recommendation: This policy appears to be slightly in conflict with Policy RDF 3. See recommendation under Policy RDF 3 above.

### General Matters

Of significant concern is the fact that almost all the policies in the RSS are prefixed by the term 'Plans and strategies should .....' or 'Local authorities should .....'.

The first area of concern is that the RSS is laying a very considerable duty on local planning authorities to undertake further work within the LDF process in relation to most of the planning issues covered in the document. In small authorities such as Fylde Borough, there is neither the expertise nor the resources to undertake all of the work.

The second area of concern is that although RSS will be a part of the statutory development plan, and should be taken into account in the development control process, very few of the policies are capable of interpretation as development control policies since they seek to 'delegate' matters to other policies and plans, as indicated above.

This shortcoming could take on additional significance if most Structure Plan and Local Plan policies are abandoned after the normal three year 'saved' period provided in transitional arrangements..

Recommendation: An objection be raised which highlights these points.

Implications	
Finance	No direct implications
Legal	RSS is a part of the Statutory Development Plan.
Community Safety	No direct Implications
Human Rights and Equalities	No direct Implications
Sustainability	Sustainability is a guiding principle of RSS.
Health & Safety and Risk Management	No direct Implications

Report Author	Tel	Date	Doc ID
Tony Donnelly	(01253) 658610	20 <sup>th</sup> May 2006	

List of Background Papers		
Name of document	Date	Where available for inspection
Submitted Draft RSS	Jan 2006	Local Plans Section, Town Hall <a href="http://www.nwra.gov.uk/rpg">www.nwra.gov.uk/rpg</a>

### Attached documents

1. Appendix: Submitted Draft regional Spatial Strategy Structure

## Submitted Draft Regional Spatial Strategy Structure

### Part 1: Introduction

1. The Role and Purpose of RSS
2. Our Region
3. The Wider Policy Context

### Part 2: The Regional Development Framework

4. Objectives and Outcomes
5. An Overview of RSS
6. Regional Development Principles
7. Regional Spatial Framework

### Part 3: The Regional Policy Framework

8. Working in the North West
9. Living in the North West
10. Transport in the North West
11. Enjoying and Managing the North West

### Part 4: Sub-regional Policy Frameworks

- 12. Manchester City Region
- 13. Liverpool City Region
- 14. Central Lancashire City Region
- 15. Cumbria and North Lancashire
- 16. South Cheshire

## Part 5: Implementation, Monitoring and Review

- 17. Implementation, Monitoring and Review
- 18. Glossary
- 19. Transitional Arrangements for Structure Plans

## Appendices



# REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	8 <sup>TH</sup> JUNE 2006	6

## STATEMENT OF COMMUNITY INVOLVEMENT

### Public/Exempt item

This item is for consideration in the public part of the meeting.

### Summary

This report informs the Committee of the results of the consultation on the Pre – Submission Draft of the Statement of Community Involvement ( Regulation 26 consultation ) following agreement of that document by Council on the 27<sup>th</sup> February 2006. Changes to the document are proposed having regard to the consultation responses received and authority will be sought from Council on 24<sup>th</sup> July to undertake the Regulation 28 stage of consultation and public participation.

### Recommendation/s

To recommend to Council that the Submission Draft Statement of Community Involvement be agreed for the purposes of the Regulation 28 consultation and public participation as contained in Appendix 4 to this report.

### Cabinet Portfolio

The item falls within the following portfolio[s]:

Development and Regeneration      ([Councillor](#) Roger Small)

## **Report**

As part of the new planning system of Local Development Frameworks brought in by the Planning and Compulsory Purchase Act 2004, there is a requirement on local planning authorities to prepare a 'Statement of Community Involvement' (SCI).

The statement must be a clear public exposition enabling the community to know how and when they will be involved in the preparation of local development documents ( within the local development framework ) and how they will be consulted on planning applications received by the Council.

Regulations set out the minimum standards to be met in terms of consultation arrangements and the statement must show how these minimum standards will be met or exceeded.

The preparation of the SCI is itself subject to statutory procedures. In brief form, these are:

A pre-draft SCI must be the subject of consultation with a number of 'specific consultation bodies' and 'general consultation bodies' under regulation 25. These bodies are defined in the pre-draft SCI itself (Stage 1)

Taking account of the representations made at the first stage, a second round of consultation and public participation must be taken in relation to the draft SCI. This stage involves a second reference to the above bodies and a first reference to the general public under regulation 26. The purpose of this report is to provide the results of this consultation and make associated recommendations for modifying the SCI in the light of responses received.

Submission to the Secretary of State. This draft SCI is also to be offered for consultation and public participation under regulation 28.

An independent examination takes place into the soundness of the SCI. It is hoped that outstanding matters can be dealt with by way of written representations, although people have a right to be heard in person at the examination. ( regulation 34 ).

A binding report is received from the Inspector ( regulation 35 ).

The Council can then proceed to adoption (regulation 36 )

The Council approved the pre-submission draft SCI at its meeting on 27<sup>th</sup> February 2006. The pre-submission draft was put out for consultation from 16<sup>th</sup> March 2006 until the 28<sup>th</sup> April 2006 ( regulation 26 ).

Appendix 1 contains a list of the 42 parties who responded to this consultation.

Appendix 2 contains a short summary of the numbers of responses received.

Appendix 3 contains a summary of the responses received together with your officers' responses and recommendations.

Appendix 4 contains suggested changes to the document suggested by officers independently of the consultation process.

Appendix 5 is the amended document which will become the Submission Draft SCI when it has been agreed by Council.

Planning Policy Scrutiny Committee is asked to consider the representations received and the proposed changes recommended to the draft SCI prior to it being considered by the portfolio holder and Council.

IMPLICATIONS	
Finance	Consultation on LDDs and planning applications will have significant financial implications. The consultation arrangements described should only be adopted if the Council is willing to fund them.
Legal	The SCI is a statutory requirement and has to be prepared according to regulations.
Community Safety	N/A
Human Rights and Equalities	Consultation arrangements will have to have regard to these issues.
Sustainability	Consultation arrangements will take place on the sustainability appraisals on LDDs
Health & Safety and Risk Management	Local Development Documents may be rejected at examination stage if the consultation has not been carried out in accordance with the SCI.

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LIST OF BACKGROUND PAPERS		
NAME OF DOCUMENT	DATE	WHERE AVAILABLE FOR INSPECTION
SCI File P12		Forward Planning and Policy Section. Town Hall, St Annes

### Attached documents

Appendix 1: List of all parties responding to the regulation 26 consultation

Appendix 2: A summary of the numbers of responses received

Appendix 3: A summary of the responses received together with officers responses and recommendations

Appendix 4: Changes recommended by officers independently of the consultation process

Appendix 5: The amended Submission Draft SCI

**List of All Bodies/Persons responding to the Consultation.**

Each body/person has been given a reference. The first number in the reference relates to the position that they appear in the Register of Consultees. The letters relate to Specific Consultation Bodies, General Consultation Bodies Other Consultees etc.

The third part of the reference relates to the type of representation, that is C, for comments, NC for no comments ( due for example lack of resources ), +R for a positive response to all the questions on the questionnaire, and Res for responses made in relation to some or all of the questions on the questionnaire.

The representations have each been given a number ( see Appendix 3 ) the number which is the fourth part of the reference relates to the question number on the questionnaire, to which that representation relates.

**Government Departments**

Government Office for the North West 1/GD/C

**Specific Consultation Bodies – Local Authorities**

Blackpool Borough Council 2/SCB/Res

Lancashire County Council 3/SCB/C

**Specific Consultation Bodies Parish Councils**

Ribby with Wrea Parish Council 4/SCB/Res

Staining Parish Council 5/SCB/Res

Little Eccleston with Larbreck Parish Council 6/SCB/Res

**Specific Consultation Bodies**

United Utilities North West 7/SCB/+R

Highways Agency 8/SCB/+R

Fylde Primary Care Trust 9/SCB/+R

National Grid 10/SCB/C

The Wildlife Trust for Lancashire, Manchester and North Merseyside 11/SCB/+R

The Countryside Agency 12/SCB/C

CPRE Lancashire Branch Fylde District Group 13/SCB/Res

Community Safety Department 14/SCB/Res

**General Consultation Bodies Voluntary Bodies**

Access to All 15/GCB/Res

Pre School Learning Alliance 16/GCB/+R

**General Consultation Bodies Religious Groups and Churches**

Churches Together 17/GCB/+R

**General Consultation Bodies Local Businesses**

Chadwick Hotel 18/GCB/+R

Croft Goode Partnership 19/GCB/+R

Oldroyd Publishing Group Ltd 20/GCB/+R

J W Stringer Ltd 21/GCB/+R

**General Consultation Bodies Disabled Groups**

Disability Rights Commission 22/GCB/NC

**General Consultation Bodies Business Support**

Chamber of Trade 23/GCB/Res

**Other Consultees Agents/Consultants**

Peacock and Smith on behalf of Morrisons 24/OC/C

**Other Consultees Health**

Joyce Stewart Lancashire County Council 25/OC/C

**Other Consultees Infrastructure Service Providers**

British Waterways 26/OC/C

**Other Consultees Interested Bodies**

Mr D Lever 27/OC/Res

Mr J Dovey 28/OC/Res

Mr G Frith 29/OC/Res

Mrs P Clark 30/OC/Res

Mr J Hogan 31/OC/C

Mr I Darbyshire 32/OC/Res

Mr D Booker 33/OC/Res

Lytham Against Inappropriate Development 34/OC/+R

**Other Consultees Miscellaneous**

St Davids Community Group 35/OC/Res

Supporters of Ashton Gardens 36/OC/Res

CROWD 37/OC/Res

H M Prison Kirkham 38/OC/+R

Housing Department Fylde Borough Council 39/OC/Res

The Garden History Society 40/OC/NC

**Other Consultees Nature Conservation / Countryside Bodies**

Country Land and Business Association 41/OC/NC

**Other Consultees Transport Bodies and Groups**

Blackpool and Fylde Users Association 42/OC/+R

**Summary of Responses to Pre-Submission Draft of the Statement of Community Involvement ( SCI ).**

A total of 539 bodies/ individuals were consulted in writing about the Pre-Submission Draft SCI and invited to comment.

Five organisations wrote to state that they had no comment to make on the Pre-Submission Draft SCI. They were the National Grid, The Countryside Agency, The Disability Rights Commission, The Garden History Society and the Country Land and Business Association.

There were thirteen questionnaires returned in which the responses to all twelve questions were positive. These thirteen respondents are marked with an asterisk in Appendix One. The Blackpool and Fylde Users Association also wrote to say that they were content with the general administrative approach being proposed.

Government Office for the North West, Lancashire County Council and British Waterways all made comments on the text ( Appendix Three ).

A further seventeen questionnaires were returned with responses on the individual questions, and there were three further letters concerning the questions in the questionnaire ( Appendix Three ).

A total of 42 bodies/organisations responded to the consultation. This represents a response rate of 8%.



## **Appendix 3**

### **Responses to the Pre- Submission Draft of the Statement of Community Involvement**

The pre-submission draft contained a questionnaire which respondents were asked to complete. Each question in the questionnaire is dealt with in numerical order. The representations made, the officer response and the associated recommendations are listed below. Most representations were made in direct response to the set questions. However, some more general points were submitted outside this framework. These are covered first.

Where paragraph numbers are referred to these relate to the numbers in the pre-submission draft. Where these have changed in the submission draft (contained in Appendix 4) the new numbers are shown in brackets e.g. paragraph 6.22 (6.24).

Questions 1- 10 relate to Local Development Framework issues. Questions 11 and 12 relate to Development Control issues.

### **General Comments on the Text**

#### **Government Office for the North West 1/GD/C**

Paragraphs 6.6-6.13 relating to the Core Strategy are identical to paragraphs 6.16 to 6.23 relating to the other DPDs. Is there any scope for combining these, whilst retaining the clarity that currently exists?

At paragraph 6.25/26 when referring to all the consultation groups listed above we recommend that you quote the earlier paragraph numbers that the reader can refer to.

The Soundness Test, this test relates to the need for the LPA's strategy for community involvement to link with other community involvement initiatives eg the community strategy. Although we note that the draft SCI makes references to discussing the LDDs at various stages with the LSP, we suggest that you consider whether there is scope for saying more about how the consultation on LDDs might link in with the consultation on other initiatives.

#### **Response:**

The paragraphs on consultation arrangements are not identical. Guidance on producing SCIs does state that the consultation arrangement for all of the different types of documents that make up the LDF must be stated separately. Therefore, there seems to be no scope for combining these paragraphs.

It is agreed that back reference needs to be made to specific paragraphs in paragraph 6.26.

Further text has been added, see Paragraph 7.3. This acknowledges that greater co-ordination of strategy production within the Council and between the Council and the LSP would make much sense and provides a mechanism for achieving this.

**Recommendation:**

Paragraph 6.26 (6.30) be amended to include specific related paragraph numbers.

**Lancashire County Council 3/SCB/C**

**Representation**

Paragraph 2.2 defines the Development Plan. It should also state that the Joint Lancashire Structure Plan 2001-2016 remains a part of the statutory development plan. On adoption ( 31 March 2005 ) it will be a saved plan for 3 years ( subject to the qualifications at paragraph 5.8 of PPS12 ).

**Response:** This is agreed.

**Recommendation:**

A new paragraph after 2.2 should be inserted:

‘Also, the Joint Lancashire Structure Plan 2001-2016 remains a part of the statutory development plan for a period of three years from the date of adoption ( 31 March 2005 ) subject to the qualifications at paragraph 5.8 of PPS12: Local Development Frameworks.’

**British Waterways 26/OC/C**

British Waterways is pleased that it is identified as a general consultee in the preparation of LDFs, it is also grateful for the clarification that it will be consulted throughout the plan preparation process but only when the subject matter of the document is relevant.

Also British waterways is pleased that it is identified as a consultee in relation to planning applications. It must be consulted on any planning applications which ‘have the potential to affect the safety and integrity of any waterway, reservoir, canal feeder channel, watercourse, let off or culvert owned or managed by British Waterways. The zone of consultation extends 150m from either side of a waterway or feeder, or 150m from the edge of a reservoir.

**Response:**

These comments are noted.

**Recommendation:**

No change to the SCI.

**Jim Hogan 31/OC/C**

A small public filter should be set up which comprises one representative each from the Civic societies of Lytham and St Annes, one from St Annes Parish Council and one from the Chamber of Trade. A pre planning review by this small group would make sure any interested party was informed of the proposal.

**Response:**

A weekly list of all planning applications submitted is sent out to the Civic Society and the Parish Councils including those in the rural area. Applications are also publicised in a variety of other ways which are listed at paragraph 12. It is not considered necessary to set up a small public filter, as the Council already consults very widely on planning applications.

**Recommendation:**

No change to the SCI.

**Peacock and Smith 24/OC/C**

**Representation:**

The Company generally supports the proposals set out in the draft SCI for future consultation.

We request that we are consulted at the earliest possible stage of document preparation.

**Response:**

Paragraph 6.3 states that we will write to all parties within the 'general consultation bodies' and 'other consultees' sections of the Register of Consultees prior to the commencement of each individual LDD to see if they want to be consulted on it.

Peacock and Smith have been placed on the Register of Consultees.

**Recommendation:**

No change to the SCI.

## **Responses to the Questionnaire**

### **Questions Relating To Consultations on Local Development Documents**

#### **Q1. Is the Council's consultation philosophy appropriate?**

There were 25 positive responses to this question and 5 negative responses. David Booker added the comment “ Specifically I welcome the intention to report back to people the outcome from their representations. It is disheartening to feel commenting is a waste of time because nothing appears to change as a result but no one explains why”. ( 33/OC/Res/1)

#### **Lytham St Annes Chamber of Trade 23/GCB/Res/1**

We should be consulted early to give us a chance to respond. This response was also made to questions 10 and 12 and this is the response in relation to all three questions.

#### **Response:**

Paragraph 6.3 states that we will write to all parties within the ‘general consultation bodies’ and ‘other consultees’ sections of the Register of Consultees at the commencement of each individual LDD to see if they want to be consulted on it.

This means everybody will be consulted at a very early stage. Although this early contact will be wide ranging anybody who doesn’t respond will not be consulted further thereby reducing the size of later consultations and making the whole task more manageable.

#### **Recommendation:**

No change to the SCI

#### **Mr D Lever 27/OC/Res/1**

Admirable but will such wide ranging consultation be manageable in terms of available staff and resources?

**Response:**

The document has been written having regard to the issue of resources. Because the new planning system anticipates much greater public and stakeholder involvement, it is acknowledged that this will involve additional costs. Sections 9 and 16 address the issue of resources.

**Recommendation:**

No change to the SCI

**Ian Darbyshire 32/OC/Res/1**

Paragraph 1.2 states that the planning system should be flexible and responsive to the needs of the community. It would be useful to state what these needs are in order to get a feel for the necessary flexibility.

Paragraph 2.4 states that procedures for the preparation of the RSS include a requirement to produce a statement on the consultation process undertaken. It is not clear to which document this process is referring the RSS or SCI.

At 3.1 i) Clarification of the relationship of the community involvement to the appropriate level of planning is suggested.

ii ) This is a desirable aim however from this SCI it would seem that it is only proposing discussion on the compliance of a particular planning proposal to the RSS. If the community has had no say in the RSS requirements how can they have a sense of ownership of local policy decisions. I suggest clarification is necessary.

vi) Agreed but also at the RSS level

3.3 These are agreeable statements at the SCI level but the major decisions influencing the planning have been established within the higher level documentation eg RSS and the Secretary of State policies. Obviously the impact and work involved in changing the higher level requirements can be extensive. It would however be in the general spirit of community involvement highlighted in this introduction, to identify a route to influencing at least the RSS.

3.5 The Local Strategic Partnership is referred to, it is not evident what it is and where it fits.

**Response:**

Strengthening community involvement in the planning process will make it more flexible and responsive to the needs of the community. This is the first time we have produced an SCI, this document is about asking people what their needs are when they are being consulted in relation to planning.

Paragraph 2.4 is referring to consultation procedures for the RSS.

3.1 i) The SCI sets out different levels of planning e.g. development control and the writing of policies and the different types of consultation that will be appropriate.

The SCI is not proposing discussion on the compliance of planning proposals to the RSS. Planning policies in the Local Development Framework must reflect the wider policy context provided in the RSS for the North West. The community has every right to participate in the preparation of RSS which has its own consultation arrangements undertaken by NWRA.

The SCI is a long and complicated document, it intended to relates only to the Local Planning Authority's LDF, therefore it does not contain details about the consultation on the RSS. However, it is agreed that a short draft timetable for the RSS, and contact details should be provided.

It is agreed that an explanation of the composition and function of the LSP should be added to the SCI.

**Recommendation:**

A further paragraph should be inserted at 2.4 (2.5) which states:

The RSS is produced by the North West Regional Assembly and the document and the consultation arrangements can be viewed on their website at [www.nwra.gov.uk](http://www.nwra.gov.uk).

Insert a footnote after paragraph 3.5 as follows:

‘The Local Strategic Partnership is a partnership of public, private and voluntary sector organisations established to tackle various key issues in the community including housing, health, regeneration, crime and tourism. Although the Council sits on the LSP, it is an independent body separate from the Council.’

**Supporters of Ashton Gardens 36/OC/Res/1**

We do not support using and integrating with the Local Strategic Partnership to the extent suggested. Unlike our councillors, this body is not subject to democratic election by the community it therefore, has no special mandate to speak for the community, and should be accorded no more or less consideration than any other local group. The reference to the LSP in this section should be deleted.

**Response:**

The LSP will not be speaking for the community and it will not be given any special status. However, it does provide a very useful tool for consulting with a wider group of interested public, private and voluntary sector organisations. Under the new planning system planning authorities are advised by Government that they must work very closely with their LSPs.

**Recommendation:**

No change to the SCI

**CROWD 37/OC/Res/1**

The current Fylde Borough Council policy for consultation does not meet the standards set out in Government advice.

At paragraph 3.5 delete 'but' at end of first bullet point and replace with 'and'.

Delete second bullet point and replace with “ make special efforts to engage in consultation with those parts of the community who have not previously been involved in the planning process.

**Response:**

Government Office for the North West are satisfied that Fylde Borough Councils policy does meet the standards set out in government advice. They have asked for one amendment in relation to linking the consultation on the SCI with consultation on other initiatives.

It is not unreasonable to avoid wasting resources by focussing consultation on those groups and individuals who want to take part in the process. Paragraph 6.5 states that all parties on the Register of Consultees will be asked at the commencement of each individual LDD if they want to be consulted on it.

Bullet Point One refers to 'hard to reach groups' they are the individuals who have not previously been involved in the planning process however, it is agreed that further text should be added to Bullet Point One to make this clear.

Section 5 details how the Council will attempt to reach those parts of the community not previously involved in the planning process.

**Recommendation:**

At paragraph 3.5 the 'but' at the end of the first bullet point should be deleted.

The following phrase should be added to the first bullet point 'and make special efforts to engage in consultation with those parts of the community who have not previously been involved in the planning process'.

**Q2. Are there any other groups, bodies or individuals that should be included on the Register of Consultees?**

**General**

There were a number of suggestions for new consultees. These have all been included on the Register of Consultees database.

**Joyce Stewart Lancashire County Council 25/OC/Res/1**

The more bodies you include, the more problems you will have.

**Response:**

One of the main aspects of the new LDF system is greater public involvement. We are hoping for useful contributions from all of the bodies we include.

**Recommendation:**

No change to the SCI

**Pauline Clark 30/OC/Res/2**

The list appears to be very comprehensive.

**Response:**

Comment noted.

**Recommendation:**

No change to the SCI

**David Booker ( this representation was also made in relation to Q3 )  
33/OC/Res/2 and 33/OC/Res/3**

Lytham St Annes has a higher than average proportion of elderly residents, probably a “hard to reach group”. Perhaps providing a cut out form in the local paper might capture views from such residents.

**Response:**

The SCI was advertised using a full page advert in the local paper. The SCI and questionnaire were put out in all the local libraries. This comment is noted.



**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/2  
Supporters of Ashton Gardens 36/OC/Res/2  
CROWD 37/OC/Res/2**

We believe that SOAG and other voluntary groups concerned with protecting, preserving and enhancing the local environment should be re –designated in the Register of Consultees as “Voluntary Group” in class 3, not a class 4 group consulted by the Council “only on a discretionary basis”.

**Response:**

The consultation categories are defined in Annex E of Planning Policy Statement 12 which provides an extremely comprehensive and definitive list of which consultees should be included as Specific Consultation Bodies, Government Departments, General Consultation Bodies and Other Consultees. Community Groups are included in the section on Other Consultees.

**Recommendation:**

No change to the SCI

**Q3. Are there other measures the Council should undertake to engage more effectively with a wider section of the community?**

There were 23 responses which said that there were no other measures that the Council should undertake. In addition Ian Darbyshire stated that the list was commendable ( 32/OC/Res/3 ). Pauline Clark stated that the existing measures are adequate, every individual in my area has had the opportunity to be involved through the questionnaires ( 30/OC/Res/3 ).

**Blackpool Borough Council 2/SCB/Res/3  
Community Safety Department 14/SCB/Res/3**

Documents and information should be available in schools and colleges to encourage the involvement of younger members of the community. There should be more youth/school involvement.

**Response:**

It is agreed that it would be beneficial to involve local schools/colleges/youth groups in the planning process. All 24 local schools were advised of the consultation on the SCI, though they were not sent a copy of the document itself. None of them

responded. We will continue to write to them at the start of the preparation of each LDD. In the past public meetings have been held at schools but these have been poorly attended. We will continue to endeavour to involve young people in the process.

All primary and secondary schools are on the Register of Consultees.

**Recommendation:**

No change to the SCI.

**Access for All 15/GCB/Res/3  
Supporters of Ashton Gardens 36/OC/Res/3  
CROWD 37/03/Res/3**

The Council should hold a series of public meetings throughout the area where articulate planning experts can explain the intention of the process in clear, plain English, and where questions can be asked by the public about the planning formulation process, why the process is changing, and how their contribution to the new process can make a difference. These meetings should be held in connection with town/ parish council meetings.

**Response:**

It is proposed to hold meetings, the sixth bullet point at 5.1 states that public meetings will normally be held in the evening to ensure as many people as possible have a chance to attend.

In the past we have held many public meetings about the Local Plan, in the rural areas these have been held at Parish Halls and in the urban area they were often at schools and church halls.

We will continue to try to engage the public through meetings but it is important to acknowledge that they are not always the best way to get people involved.

**Recommendation:**

No change to the SCI.

**CROWD 37/03/Res/3**

The Council should actively promote the development of Parish Plans and Village design statements to involve local communities in the Fylde in actively seeking and setting out the planning needs and opinions of local communities.

**Response:**

The Council has been involved in the production of parish plans in particular the one for Freckleton. However, these plans do not have any statutory weight given to them as they do not go through any formal legal process. Therefore, it is very difficult for any of the planning related proposals in them to be carried through to fruition. They are very useful for getting people interested in their local environment/issues but these plans do not form part of the LDF unless they are pursued through the correct legal procedures.

**Recommendation:**

No change to the SCI.

**St David's Community Group 35/OC/Res/3**

Instead of getting into bed ever closer with commercial partners, the Council should seek involvement with the people through local democracy. FBC fought tooth and nail to try to suppress the St .Annes-on-the-Sea Town Council and even when it became inevitable, they sought to emasculate it by severely limiting the number of councillors, and depriving it of funds for as long as possible. This petty animosity between Borough –level party politics and local level non-party-political democracy has got to stop. The best way to engage with the community would be to treat its locally elected representatives with respect.

**Response:**

These allegations are fully disputed. Fylde Borough Council supported the formation of the Parish Council in the application to ODPM.

The SCI sets out the consultation arrangements which the Council is proposing to use in the future. It states very clearly that the Council is going to try harder to engage local people in the planning process. The SCI indicates that all Parish Councils will continue to be consulted on planning matters.

**Recommendation:**

No change to the SCI.

**Q4. Are the proposed methods of consultation likely to be most effective in engaging with the widest sections of the community?**

There were 24 positive responses to this question.

**Blackpool Borough Council 2/SCB/Res/4**

It may be worth considering alternative media formats and also advertising consultation events /stages in other public areas such as schools and supermarkets.

**Response:**

It is a good idea to have some small eye catching posters ( flyers ) printed advertising consultation stages and meetings, these could be put up in schools, libraries, supermarkets and on Parish Council notice boards.

**Recommendation:**

The following additional bullet point should be included under paragraph 5.1 as follows:

‘Advertising public consultation events in public places such as schools, libraries and supermarkets;’

**Little Eccleston with Larbreck Parish Council 6/SCB/Res/4**

The Parish Council is directly opposed to Area Committees.

**Response:**

This comment is noted. The SCI makes no reference to Area Committees. The Council has no plans to use area committees at present.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/4**

The exclusion from the early stages of consultation of certain voluntary bodies ( who have historically been “a thorn in the side” of the Council when the Council wanted to do something which they knew would be unpopular ), seems designed to assist in railroading decisions through. A Council which genuinely wanted to know , would consult as widely as possible in the early stages, before key decisions have been taken.

**Response:**

Paragraph 6.3 states that we will write to all parties within the ‘general consultation bodies’ and ‘other consultees’ sections of the Register of Consultees prior to the commencement of each individual LDD to see if they want to be consulted on it.

See also the response to Question 2 35/OC/Res/2 which states:

The consultation categories are defined in Annex E of Planning Policy Statement 12 which provides an extremely comprehensive and definitive list of which consultees

should be included as Specific Consultation Bodies, Government Departments, General Consultation Bodies and Other Consultees. Community Groups are included in the section on Other Consultees.

**Recommendation:**

No change to the SCI.

**Supporters of Ashton Gardens 36/OC/Res/4**

In the first of the three stages, the aim is to assemble an evidence base to scope and inform the development of options. This evidence must be sought from the widest range of sources in order to find the extent, and to achieve a balanced result. In this context it makes no sense to limit the consultees to Classes 1,2 and 3.

We firmly believe that Class 4 groups should also be consulted at this stage unless they have indicated a contrary desire. Selective evidence gathering will not give broad based, meaningful results.

Delaying wider consultation until the preferred options have been settled will only further the perception that public consultation only takes place when decisions have already been made.

By the time of the third consultation, the document will be more or less settled, with most options removed, and there seems little point in undertaking wide public consultation at this stage unless the intent is to explain the decisions already made.

**Response:**

The evidence gathering mainly involves the collection of facts and figures from a wide range of sources. These facts and figures are used to highlight issues and options for addressing these issues. Consultation on these issues and options is the first formal consultation stage. This is called the Regulation 25 consultation. At the Regulation 25 consultation the specific consultation bodies and the general consultation bodies are consulted on issues deriving from the preparation of the evidence base and the preparation of the alternative options. This stage does not include wider public consultation.

The second consultation stage is the Regulation 26 consultation which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under Regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted. The Regulation 26 consultation takes place in respect of all options considered not just the preferred options.

These consultation arrangements are set out in the Town and Country Planning ( Local Development ) ( England ) Regulations 2004 which is a statutory instrument. The Council cannot decide to follow a different procedure. Government Office for the North West have been consulted on the SCI and they have confirmed that the Council have interpreted the regulations correctly.

It is very important not to carry out too many consultations with members of the public. People get confused and 'consultation fatigue' is a widely recognised problem.

The arrangements put in place by the Government do allow people to express their opinions on the options at the correct stage.

**Recommendation:**

No change to the SCI.

**CROWD 37/OC/Res/4**

Council should explain RSS specific local context to the community. The Council should engage the community in consultation regarding the development of the RSS and the Council's own submission to the RSS. The Council should seek both community endorsement for its input to the RSS consultation process and take active steps to ensure that the Fylde community is aware of the RSS process, the opportunity for public consultation on the RSS and the dates of such consultation.

Council should involve local planning interest groups ( eg CROWD ) at Regulation 25 stage. The Council reserves to itself, on several occasions in the pre submission draft, the choice of which consultation bodies are relevant or appropriate to consultation on a particular document at a particular stage. This fails the test of transparency which the council has set itself. The Council should publish, to all consultation bodies and the public, a list of those being consulted for a particular document/stage and offer those bodies and the public the opportunity to decide themselves whether they have a relevant interest in the particular document/ stage.

The Council should initiate each consultation stage ( and certainly Regulation 26 stage ) with public meetings.

**Response:**

Paragraph 2.4 does explain the purpose of the RSS. The statutory guidance on the production of SCIs does not recommend that they include details of the local implications of the RSS. The SCI is about the Council setting out clearly how people can expect to be consulted on the LDF and planning applications. It would become and even longer and more complicated document if it contained details of the RSS. Community endorsement for the Council's input to the RSS process is obtained because any submissions on the RSS are placed before the Cabinet of the Council, that is they are approved by elected members. The SCI will be amended to include more detail on the RSS. See 32/OC/Res/1

The consultation categories are defined in Annex E of Planning Policy Statement 12 which provides an extremely comprehensive and definitive list of which consultees should be included as Specific Consultation Bodies, Government Departments, General Consultation Bodies and Other Consultees. Community Groups are included in the section on Other Consultees.

At the Regulation 25 consultation the specific consultation bodies and the general consultation bodies are consulted on issues deriving from the preparation of the evidence base and the preparation of the alternative options. This stage does not include wider public consultation.

The second consultation stage is the Regulation 26 consultation which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under Regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted.

These consultation arrangements are set out in the Town and Country Planning ( Local Development ) ( England ) Regulations 2004 which is a statutory instrument. The Council cannot decide to follow a different procedure. Government Office for the North West have been consulted on the SCI and they have confirmed that the Council have interpreted the regulations correctly.

There will be public meetings at the Regulation 26 stage where these are appropriate.

**Recommendation:**

More detail will be included on the RSS, see Recommendation under 32/OC/Res/1.

The seventh bullet point under paragraph 6.10 (6.11) should be expanded to read:

‘The holding of public meetings and/or workshops led by professional facilitators (if this is felt by any party to be particularly useful);’

**Housing Department Fylde Borough Council 39/C/Res/4**

Documents on the Council’s Website should be in an obvious place with links from the homepage. Any literature sent out which states the web site as a way to view documents should include either the exact link or instructions on how to find the documents.

Paragraph 5.1 second bullet point states large print versions will be available. We have contacted the Blackpool and Fylde Society for the Blind and they suggest Arial font size 16 in bold double line spacing. It is also good practice to put this on yellow paper with black print.

**Response:**

These very useful comments are noted. Links to the home page will be made during consultation periods. The suggested font and size will be used.

The second bullet point should be amended to include the extra detail above.

**Recommendation:**

The appropriate formats for partially sighted persons be noted for future use.

The fifth bullet point under paragraph 5.1 should be amended to read:

‘Information will be placed in a prominent position on the Council’s website so that documents and information can be accessed from home, within and outside normal office hours;’

**Q5. Are the Proposed Arrangements for consultation with the particular types of consultees acceptable in light of statutory requirements and the Council’s consultation philosophy?**

There were twenty five positive responses to question number five.

**Ribby with Wrea Parish Council 4/SCB/Res/5**

Yes but emphasis is on North West Assembly and other second tier councils not the community.

**Response:**

It is unclear what change this response is requesting. The framework of consultation arrangements is established by Government. The comment is noted.

**Recommendation:**

No change to the SCI

**Mr D Lever 27/OC/Res/5**

**Supporters of Ashton Gardens 36/OC/Res/5**

My only concern is that in discussions with Blackpool and Wyre representatives, the wishes of Fylde Borough people are not compromised by pressure from the other two authorities eg in terms of inappropriate strategy. I would not wish the whole of Fylde sub region regarded as one area – which might be thought appropriate by, for example, the unelected, undemocratic NWRA.



Why is it necessary to place such emphasis on coordinating the planning of the Fylde sub region when the RSS will set parameters and policies- unless, of course, it is to anticipate the boundary of the potential new unitary authority.

**Response:**

The new system does clearly state that there should be more joint working between authorities. It is very important in relation to housing because the housing markets of the three boroughs are inextricably linked.

However, any decisions on policies will go before Council members and they will make sure that the wishes of Fylde people are not compromised by pressure from the other authorities.

The Regional Assembly makes strategic decisions for the whole of the North West, they cannot do this by looking at the individual borough council level.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/5**

The selection of who can be consulted and when, can be above and beyond the statutory minimum. The system should be flexible to cater for all circumstances, and most importantly open to scrutiny. Consultation in the earliest possible stages should be the norm, with the only people excluded being those who have expressed a desire not to be consulted on major planning changes such as Site Specific Allocations of Land.

**Response:**

Paragraph 6.3 states that we will write to all parties within the General Consultation Bodies and Other Consultees section of the Register of Consultees at the commencement of each individual LDD to see if they want to be consulted on it.

At the Regulation 25 consultation the specific consultation bodies and the general consultation bodies are consulted on issues deriving from the preparation of the evidence base and the preparation of the alternative options. This stage does not include wider public consultation.

The second consultation stage is the Regulation 26 consultation which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under Regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted.

These consultation arrangements are set out in the Town and Country Planning ( Local Development ) ( England ) Regulations 2004 which is a statutory instrument.

The Council cannot decide to follow a different procedure. Government Office for the North West have been consulted on the SCI and they have confirmed that the Council have interpreted the regulations correctly.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/5**

Limiting consultees to those who request such consultation after being approached by the Council will not produce the widest support for site specific proposals and Area Action Plans.

The Council should consult on its proposals map.

Consultation ( after notification ) should be on an opt out basis by the group concerned, not following selection by the council or DC unit/committee.

**Response:**

Consultation will not just be limited to those who request consultation after being approached by the Council. All consultation stages will be widely advertised and there will be public meetings. Anybody will be able to join the consultation at any of the appropriate consultation stages.

The Council will be consulting on its proposals map. Each Development Plan document will have maps included in it. These will go through the same consultation procedures as the document. All of these maps will in combination produce the proposals map.

Consultation will be on an opt out basis.

Paragraph 6.3 states that we will write to all parties within the General Consultation Bodies and Other Consultees section of the Register of Consultees at the commencement of each individual LDD to see if they want to be consulted on it.

Consultation will be undertaken with all consultees that request it. If parties indicate that they do not wish to be consulted or do not reply then the council will infer that they do not wish to be consulted.

**Recommendation:**

No change to the SCI

### **CROWD 37/OC/Res/5**

The Council should circulate all grades of consultees ( and public ) with its intended consultation list and invite everyone who feels they have a relevant interest to enter the consultation.

#### **Response:**

This is the exercise that has just been carried out, the Register of Consultees was circulated with the SCI. Question 2 of the questionnaire asked people if they wanted to be included or if they knew anybody who wanted to be included. We have obtained many more names that have been included on the data base after this exercise.

#### **Recommendation:**

No change to the SCI

### **Q.6 Are the proposed methods of consultation likely to be the most effective in engaging with the widest sections of the community?**

There were 25 positive responses to this question.

### **Blackpool Borough Council 2/SCB/Res/6**

Why only consult the LSP Enterprise and Employment Theme Group rather than say, the Health and Social Wellbeing/Environment Groups.

#### **Response:**

It is agreed that the reference to consulting the LSP should be broadened

#### **Recommendation:**

Bullet point 3 under paragraph 6.22 (6.24) should be amended to read:

‘Presentation to and discussion of the submission document with the relevant LSP theme groups;’

### **John Dovey 28/OC/Res/6**

Now that Warton no longer has a library a new site at which copies can be made available is required perhaps the Post Office.

**Response:**

This is agreed. Documents can be deposited at the Post Office (subject to PO agreement). The SCI does refer to 'other deposit points as appropriate' in bullet point 3.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/6**

It is obvious that the whole methodology presented here is a trick, to ensure that all the critical decisions are made at framework level (which the general public will probably not understand), thereby greatly easing the passage of unpopular planning decisions at Development Control level ( using the argument, of “ Well, I’m sorry this was all agreed in the Site Specific Land Allocation, so your objections can’t be taken into account at this later stage...”)

**Response:**

Paragraph 6.3 states that we will write to all parties within the General Consultation Bodies and Other Consultees section of the Register of Consultees at the commencement of each individual LDD to see if they want to be consulted on it.

The Council has followed all the relevant guidance on consultation and Government Office for the North West have not raised any substantive objections to this SCI.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/6**

We echo the comments of the previous two questions see 27/OC/Res/4 and 27/OC/Res/5

**Response:**

These have been dealt with above.

**Recommendation:**

No change to the SCI

### **CROWD 37/OC/Res/6**

Needs more transparency and inclusivity. The Council reserves to itself, on several occasions in the pre-submission draft the choice of which consultation bodies are relevant or appropriate to consultation on a particular document at a particular stage. This fails the test of transparency which the Council has set itself.

#### **Response:**

At the Regulation 25 consultation the specific consultation bodies and the general consultation bodies are consulted on issues deriving from the preparation of the evidence base and the preparation of the alternative options. This stage does not include wider public consultation.

The second consultation stage is the Regulation 26 consultation which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under Regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted.

These consultation arrangements are set out in the Town and Country Planning ( Local Development ) ( England ) Regulations 2004 which is a statutory instrument. The Council cannot decide to follow a different procedure. Government Office for the North West have been consulted on the SCI and they have confirmed that the Council have interpreted the regulations correctly.

#### **Recommendation:**

No change to the SCI

### **Q7. Are these proposed arrangements for consultation with the particular types of consultees acceptable in the light of statutory requirements and the Councils consultation philosophy?**

There were 25 positive responses to this question.

### **John Dovey 28/OC/Res/7**

Repeated reference to “ extent that the Council thinks” is clearly open to abuse by the Council. Surely there should be some criteria which should be used to establish whether the SPD is relevant. Note this comment applies elsewhere in the document also.

**Response:**

The Government empowers the Council to use some discretion in deciding who to consult on SPDs. Not all bodies and stakeholders will have an interest in specific SPDs.

Paragraph 6.3 states that we will write to all parties within the ‘general consultation bodies’ and ‘other consultees’ sections of the Register of Consultees prior to the commencement of each individual LDD to see if they want to be consulted on it.

As such, there is no question that all who want to be involved in the consultation process will be included.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/7**

Hard to tell regarding SPDs since we don’t really know what they are.

**Response:**

An explanation of the purpose and content of SPDs is given at paragraph 2.9 and 2.10.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/7**

Again we are reluctant to express support for a system where consultees are selected by reference to their perceived relevance, probably by officers of the Council, rather than their desire to contribute.

**Response:**

Paragraph 6.3 states that we will write to all parties within the ‘general consultation bodies’ and ‘other consultees’ sections of the Register of Consultees prior to the commencement of each individual LDD to see if they want to be consulted on it.

As such, there is no question that all who want to be involved in the consultation process will be included.

**Recommendation:**

No change to the SCI

**CROWD 37/OC/Res/7**

Needs more transparency and inclusivity.

**Response:**

This was exactly the same as CROWD's response to question 6, please see the response to Question 6 ( 37/OC/Res/6 ).

**Recommendation:**

No change to the SCI

**Q.8 Are the proposed methods of consultation likely to be the most effective in engaging with the widest sections of the community?**

There were 25 positive responses to this question.

**Blackpool Borough Council 2/SCB/Res/8**

Why only consult the LSP Enterprise and Employment Theme Group rather than, say the Health and Social Well Being /Environment Groups?

**Response:**

It is agreed that the reference to consulting the LSP should be broadened

**Recommendation:**

Bullet point 3 under paragraph 6.22 (6.24) should be amended to read:

'Presentation to and discussion of the submission document with the relevant LSP theme groups;'

**Mr D Lever 27/OC/Res/8**

I am concerned about the role of the LSP- which is an unelected Quango ( para 7.2 and elsewhere ). Surely the main direction of any FBC strategy should be agreed by elected councillors in consultation with officers. Para 7.3 does not entirely allay this concern.

**Response:**

Under the new planning system the Local Development Framework is, among other things, the spatial expression of the Community Plan. Therefore, it is imperative that the Council works closely with the LSP on LDF matters.

The LSP is an extensive group of local partners whose involvement should make the planning system more inclusive and responsive to the local community.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/8**

It depends what SPDs can do. The nature of consultation should be appropriate to the nature of whatever is changing.

**Response:**

Paragraphs 2.9 and 2.10 explain the purpose and content of SPDs. They also make it clear that the process leading to adoption must involve significant consultation and community engagement, and have regard to the results of that engagement.

At 6.23 SPDs, Who Will We Consult, it is clear that the Council will tailor the consultation to the content of the SPD.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/8**

We have no problem with a two stage process, but are unclear about the logic. It appears that SPDs are not part of the statutory development plan, but they are part of Development Plan Documents- which themselves are part of the statutory plan. This apparent dichotomy should be resolved.

Whilst sounding innocuous, this group of documents ( which includes masterplans ) suggests they have the capacity to effect change from adopted Development Plan Documents, so we believe some confidence building clarification should be included for those consulted on Development Plan Documents – to show that SPD's only supplement or clarify, and may not negate or contradict, Development Plan Documents.



**Response:**

Paragraphs 2.9 and 2.10 explain the purpose of SPD's. SPD's are not Development Plan Documents they are LDDs ( Local Development Documents ).

Paragraph 2.9 makes it clear that SPD's supplement existing policies in a development plan document. They may not negate or contradict policies in a DPD.

**Recommendation:**

It is recommended that the second sentence of paragraph 2.9 (2.10) is amended to read:

'They cannot be used to change development plan policies but are intended to elaborate upon existing policies and proposals in DPDs.'

**CROWD 37/OC/Res/8**

Supplementary Planning Documents are significant and should be subject to same levels of transparency and inclusivity as other planning documents.

**Response:**

The procedures for producing SPDs are set out in Planning Policy Framework 12 Local Development Frameworks. The process for preparing SPDs is similar to the process for Development Plan Documents but simplified. The Local Planning Authority should consult in accordance with its SCI. Although SPDs are not subject to independent examination, the underlying principles of soundness are applicable to SPDs. SPDs will be subject to the same levels of transparency and inclusiveness as other planning documents even though slightly different procedures will be followed.

**Recommendation:**

No change to the SCI

**Q9 Are the reporting back mechanisms adequate?**

There were 25 positive responses to this question.

**Ian Darbyshire 32/OC/Res/9**

There could be a need for extensive interface control documentation. Its preparation and maintenance could result in excess effort. May be a little more investigation into the impacts of the statements in section 7 would be useful before committing to them.

The reporting back is adequate but to provide such a response to the consultation comments requires some sort of query / problem evaluation / alleviation / solution mechanism to be in place. There may even be a need to establish some kind of problem / comment control board. Sounds expensive to me.

**Response:**

These comments are noted. We are aware that reporting back will create a lot more work, however, the Council is committed to carrying out this work.

**Recommendation:**

No change to the SCI

**David Booker 33/OC/Res/9**

I am particularly in favour of sending a copy of the Consultation Statement to everyone that makes representations. Emailing this should be encouraged to keep costs down.

**Response:**

Paragraph 8.2 states that a copy of the Consultation Statement will be sent to every person or body making representations.

Many of the persons/ bodies on the Register of Consultees do not have e mail addresses, but hopefully as time goes on this will change and we will be able to email out more documents.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/9**

No very far from it. Here we get to the nub of the problem with FBC and communication. If any process is ever to improve, then feedback should be quantitative where possible, and qualitative otherwise but definitely measurable. It is not about telling everybody what you have decided, it is about measuring how effectively you have engaged people in decision making. If you don't capture the required data to support process improvement, then you will find it impossible to know that you have improved.

**Response:**

The purpose of reporting back is to let people know how their representation has been treated, whether it has been accepted and if it has not why this is the case. We will keep accurate records of how many people have responded and what they have said, our responses to them and why we have made the decisions we have made.

As time goes on we will be able to see whether or not our consultation methods are working, it is hoped that as people become more familiar with the new system they will become more willing to be engaged. However, there may be several different DPDs out for consultation at the same time, plus ‘sustainability appraisal’ documents. There is a risk that people will become confused or get “consultation fatigue”.

We will monitor how many responses we are getting at every stage and if we discover that we are getting less responses at any stage then steps will be taken to remedy this.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/9**

Probably yes but the focus on inputs rather than objective output measures such as the % of residents who have heard of and / or taken part in the process, is not to be commended.

**Response:**

539 bodies/individuals were consulted on this SCI, 42 have responded a response rate of 8%. Similar monitoring of consultation exercises will be carried out.

It is sometimes difficult to engage people in the planning process unless a proposal is actually going to directly affect them. We will continue to try our best.

**Recommendation:**

No change to the SCI.

**CROWD 37/OC/Res/9**

Yes, if taken in conjunction with our other recommendations.

**Response:**

CROWDs other representations are detailed earlier in the report 37/OC/Res/1-8.

**Recommendation:**

No change to the SCI

**Q10 Are there other factors to which the Council should have regard in arriving at its programme of community engagement?**

There were 24 positive responses to this question.

**Ribby with Wrea Parish Council 4/SCB/Res/10**

As local ( non nimby ) views from the community are in reality, ignored is there any real point of a 'community led' consultation period. Merely a 'paper chase' to fulfil a non fulfilled philosophy of good sounding terms of reference. Planning regulations will be laid down by GONW and will be vague enough to allow planning officials to make their own interpretation, usually in favour of developers, when clearly defined rules are called for.

**Response:**

Local views from the community are not ignored. However, there are national and regional guidelines that the Council has to follow. Planning officers are not allowed to make their own interpretation. GONW are consulted along with other government departments, if they inform us that we have misinterpreted the guidelines the document is changed. Finally, any recommendations that planning officers make are put before elected members of the council to ensure that a democratic process is followed.

**Recommendation:**

No change to the SCI

**Mr D Lever 27/OC/Res/10**

Members of the public must retain the right to speak to the inspector at these " independent examinations" assuming that such a person would have gone through the correct procedure for doing so.

**Response:**

Members of the public will retain the right to speak to the Inspector at these independent examinations.

**Recommendation:**

No change to the SCI

**David Booker 33/OC/Res/10**

Keeping costs under control is obviously a major consideration. Voicemail should be avoided, there should be a duty officer so that a Human Voice is available most of the time. There should be a general e mail address for electronic communications.

**Response:**

These comments are noted.

**Recommendation:**

No change to the SCI

**St Davids Community Group 35/OC/Res/10**

In plain english sections 9 and 10 read like this :

“ And of course if we don’t find it convenient or we can’t afford it, then we reserve the right to ignore any or all of the sections 1 through 8 of this policy as we deem necessary”.

The inclusion of sections 9 and 10 make the policy document worthless in terms of people expecting an agreed procedure.

**Response:**

Sections 9 is included to make it clear that community views are only one consideration and cannot always be determinative in planning matters. It would be unreasonable not to explain this to people.

Section 10 explains that the Council does not have limitless resources for consulting people, this also a valid point.

**Recommendation:**

No change to the SCI.

**Supporters of Ashton Gardens 36/OC/Res/10**

The services of a planning professional should be made available by arrangement to help assist groups to formulate their responses.

Paragraphs 9.2 to 9.4 should be deleted. If the Borough Council fails to respond to strongly expressed community views, or seeks to operate simply as the administrative arm of Central Government, they will both cease to be Local Government, and will ultimately pay the electoral price for doing so. They govern with the consent of the community they serve, not in spite of it.

We also take issue with some of the points in section 10. The negative tone is unfortunate, as is the apparent welcoming of the conclusion that the costs of widespread consultation now, can be offset against savings from reduced input later.

**Response:**

Planning Aid is a national body which makes the services of a Planning Advisor available to community groups. Fylde Borough Council does not have the resources to provide this service. Officers cannot advise the Council and at the same time advise outside bodies in respect of the content of their representations/objections. This would involve a significant conflict of interest.

Paragraphs 9.2-9.4 state facts about the national planning system. It would be unreasonable not to make people aware of the facts before they decide whether or not to participate.

With regard to the second point there will not be reduced input later. All of the input should have been made at the earlier stages, as was the case with the old system. That input will simply go through a more streamlined process at the inquiry.

**Recommendation:**

No change to the SCI

**CROWD 37/OC/Res/10**

Community views should be regarded as having overriding materiality except where there are : specific statutory objections to the view; or where there are other matters which in the Council's reasonable view actually prevent it from accepting the community view or views ( multiple views may be just such a reason ). In such cases there is an onus on the Council to satisfy the community that its actions are justified.

It is the Council's obligation to attain a greater community involvement and to do so imaginatively and cost effectively through proper planning. To the extent that there is a judgement to be made about the likely benefits to be attained, that judgement is for the community to make, not Council professionals.

Past experience demonstrates not that there is a high degree of reluctance to become involved but rather that there is a very high level of interest in becoming involved when properly informed of the process and the consequences. The planning process is all about particular agenda and objections. It is the Council's duty to inform the community about the issues and promote the debate, not to avoid it.

What is referred to as the plus side (10.2 fifth bullet is actually the reason that the Government is insisting on strengthened and wider consultation. The streamlined process will fail to carry the public with it if consultation ( and response to consultation ) is not considerably improved.

**Response:**

Community views cannot have automatic overriding materiality. Often development is needed for the greater good of the larger community. A small number of people should not be able to prevent development which would benefit the wider community.

The SCI is intended to inform the community about future planning documents and how they can become involved in producing them.

Hopefully, consultation is being considerably improved by publishing the SCI. It is the first time the Council has set out in advance what people can expect in terms of consultation arrangements.

**Recommendation:**

No change to the SCI

**Questions Relating To Development Control**

**Q11. Do you think that the suggested arrangements for consultation are adequate?**

There were 25 positive responses to this question.

**CPRE 13/SCB/Res/11**

The CPRE raised the following issues:

The DC meetings should be returned from a 3 week cycle to a 4 week cycle because Parish Councils and the CPRE will now have to meet every 3 weeks.

At a bare minimum 31 days should be allowed between compilation of the weekly list and consideration of any of the listed applications by the DC committee. But with some contingency which can only be considered prudent, we believe that at least 35 days should be allowed.

Delegated decisions should not be made when:

- Legitimate planning policy grounds have been raised in objection
- Approval would require putting 'material considerations' ahead of planning policy considerations.

Recently changes have been introduced so that only applications relating to Kirkham and Wesham are held at Kirkham ( not the rest of the rural area )and the remainder are held at St Annes. Application documents have been made available on the Council website.

Not all members of the public have access to the internet and facilities for viewing applications on the internet at Kirkham are unsatisfactory. Not all applications are on the web, or if they are they have been incorrectly scanned.

**Response:**

The change from a 4 week to a 3 week cycle of Development Control Committee meetings is not a matter for the SCI. However, the move to a 3 week cycle does improve the chances of determining planning applications within the 56 day period. This is because it allows two meeting dates within the period. Consultees are asked to respond within 21 days ( which is the statutory period ) and this requirement has not changed under the new arrangements. There is no intention to determine planning applications before the 21 day period has elapsed.

The scheme of delegation is referred to in the SCI for information. Decisions on the scheme of delegation will be taken outside the context of the SCI.

With relation to the final point, the final two bullet points of 12.1 state that:

- Details of all planning applications , including submitted drawings and supporting documents will be made available through the Borough Council's website.
- Copies of all planning applications will be made available through the Council's Customer Contact Centres.

If the Council has failed on occasion to meet this commitment, steps will be taken to rectify this. A new document imaging system has been introduced which will make all application documents available on the web.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/Res/OC/11**

We welcome what appears to be a comprehensive list, and providing it is not a diminution of present provisions, especially with regard to on- site advertising, we are happy to support it.

We would like to see a stated end to the process where planning decisions can be made 'in principle' by the DC committee and the actual decision delegated to an officer at the expiry of the consultation period. Such slithering around the spirit of the consultative process does little to build confidence in transparency or openness,



suggesting as it does, that the consultation process itself is simply a formality to be overcome as conveniently as possible.

**Response:**

This representation is made in respect of a matter not included in the SCI.

**Recommendation:**

No change to the SCI

**CROWD 37/OC/Res/11**

There is an absence of transparency. Some planning applications have much wider impact than on those who share a boundary. A sensible judgement should be made about involving all those who might be affected.

**Response:**

Paragraphs 12.1 and 12.2 detail the consultation arrangements for planning applications. These are very comprehensive. Applications defined as major development ( 10 or more dwellings or development creating 100 square metres of floor space or more ) are advertised by site notice and press advertisement.

Paragraph 16.2 with regard to publicity for planning applications, the Council is conscious of the following matters:

- The level of neighbour notification should be proportional to the scale of the proposed development etc

CROWD have not suggested any further measures for informing other people in the area about applications. The Council is open to suggestions on these matters.

**Recommendation:**

No change to the SCI

**Q12. Do you think that the arrangements for addressing the Development Control Committee are adequate?**

There were 25 positive responses to this question.

**Mr D Lever 27/OC/Res/12**

Re Para 15.2 Councillors should be able to clarify or elicit further information from anyone who has just addressed the DC Committee, rather than merely “ ---consider their comments”.

**Response:**

Councillors are able to ask for further information (from officers) in respect of issues raised orally at Committee. It would be inappropriate for people making oral representations to become involved in a debate on a planning application. This is the role of Councillors.

**Recommendation:**

No change to the SCI

**Mr G Frith 29/OC/Res/12**

Three minutes is inadequate, suggest 4 minutes.

**Response:**

Three minutes is enough time for somebody to explain their position to the DC committee on a planning application. Applicants and developers are given the same time limitations.

**Recommendation:**

No change to the SCI.

**St Davids Community Group 33/OC/Res/12  
Supporters of Ashton Gardens 36/OC/Res/12**

The arrangements for the public to address any of the FBC committees never have been adequate. The developer invariably gets to present a glossy multi media proposal with artists impressions, computer models etc etc whereas the objector gets 3 minutes standing up on their own with their notes on a scrap of paper. Objectors should have an opportunity to put their case which is equivalent to that of developers.

Prohibition on the use of simple visual aids – for example photographs projected on a screen should be relaxed.

**Response:**

As with the Scheme for Delegation this matter is dealt with outside the SCI in a leaflet which was included at Appendix 4 of the SCI. Although people are not allowed to use visual aids they are allowed to circulate photographs and plans that can be submitted at the time they register to speak. Developers are also restricted to 3 minutes.

**Recommendation:**

No change to the SCI

**Supporters of Ashton Gardens 36/OC/Res/12**

There ought to be more support to help those wishing to speak.

The case officer might aggregate several days of advice to a developer to assist him to produce a more acceptable scheme.

It cannot be said to achieve an equitable situation when inexperienced speakers – whose lives will be affected by the decision- are thrown in at the deep end.

We strongly advocate the availability of a planning officer ( other than the case officer ) in advance of the meeting, to advise and help prospective speakers to prepare their case for or against , if only to explain which issues are eligible for consideration in committee and which are not.

**Response:**

A case officer will advise a developer at length on how to achieve a more acceptable scheme.

The Council does not have the resources to provide planning officers to advise people on how to make valid objections. Objectors can seek the advice of a planning consultant/architect ( just as the applicant will employ somebody to ensure that their plans comply with planning regulations ) alternatively Planning Aid is a national body which provides planning advice to people/ bodies who cannot afford consultants.

**Recommendation:**

No change to the SCI

**CROWD 37/OC/Res/12**

There should be arrangements for more substantive representations to be made by people to the Development Control Committee on a pre- arranged basis.

**Response:**

There is no restriction on the length of written submissions being made during the normal consultation period. Applicants and developers are restricted to the same time arrangements for addressing committee as members of the public.

**Recommendation:**

No change to the SCI

Changes Recommended By Officers Independently Of Consultation Responses

1 Within paragraph 6.3 which is describing the Council's general approach to consultation:

- Amend the text to indicate that only the 'general consultation bodies' and the 'other consultees' will be asked prior to the commencement of work on a document, whether they wish to be consulted. The reason for this is that the other consultation groups i.e. the 'specific consultation bodies' and 'government departments' have to be consulted as a statutory requirement.
- Remove the sentence which indicates that the 'Specific Consultation Bodies' will not be consulted if they do not reply since consultation with these bodies is a statutory requirement.

The amended paragraph to read as follows:

6.3 'As a central part of the Council's approach to consultation on the Local Development Framework, all parties within the 'general consultation bodies' and 'other consultees' sections of the 'Register of Consultees' will be asked prior to the commencement of each individual LDD if they want to be consulted on it. Consultation will be undertaken with all the parties that request it. If parties indicate that they do not wish to be consulted or do not reply then the Council will infer that they do not wish to be consulted.'

2 For the same reasons, paragraph 6.5 (6.6) be amended to read:

6.5 'As indicated earlier, as a central part of the Council's approach to consultation on the Local Development Framework, all parties within the 'general consultation bodies' and 'other consultees' sections in the 'Register of Consultees' will be asked if they want to be consulted on the Core Strategy. Consultation will be undertaken with all parties that request it.'

3 For the same reasons, the first bullet point under paragraphs (6.17) and (6.26) be amended to read:

'The Specific Consultation Bodies to the extent that the Council thinks that the proposed subject matter of the DPD is relevant to the body.'

4 For the same reasons, paragraph (6.28) be amended to read:

'Prior to commencement of the document, the Council will write to all the parties within the 'general consultation bodies' and the 'other consultees' sections of the

Register of Consultees in order to determine which parties wish to be consulted on the preparation of the document.

- 5 To relate better to government advice, paragraph (6.29) be amended to read:

‘Engagement with relevant local communities to discuss particular issues proposed to be contained in the draft document and the development of draft policies.’

- 6 To achieve greater clarity, paragraph 7.5 be amended to read:

‘With regard to co-ordination of Council strategy work and that undertaken by the LSP, including any review of the Community Plan, it is proposed that both parties prepare jointly, on an annual basis a ‘Statement of Complementary Working’ which would:’



**SUBMISSION DRAFT**

**STATEMENT OF COMMUNITY INVOLVEMENT**

July 2006

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## **1.0 Introduction – Community Involvement in Planning**

- 1.1 Planning shapes the places where people live and work. It is therefore right that people should be encouraged, enabled and empowered to take an active part in the process. Community involvement is vitally important to planning and historically the planning system has provided opportunities for local people to participate in key decisions about their areas.
- 1.2 The Government has recently undertaken a major programme to reform the planning system in England to make it more flexible and responsive to the needs of the community. Strengthening community involvement in the planning process is a key part of that programme. Details of how the Government has changed the planning system are referred to later in this document.
- 1.3 Fylde Borough Council is fully committed to building on the existing arrangements for community engagement and consultation by extending the scope and opportunities for engagement in the planning process. The Council considers that an accessible and transparent planning system in the borough which provides continuing opportunities for local people to participate is essential to delivering its objective of creating inclusive, accessible, safe and sustainable communities.
- 1.4 The Council's Statement of Community Involvement sets out proposals for future community engagement in the planning process within Fylde Borough. The proposals relate both to the Council's responsibilities for the preparation of planning policies through the Local Development Framework, and for the determination of planning applications, through Development Control.
- 1.5 This draft consultation document is itself the subject of consultation and the views of individuals, communities and stakeholder groups on the proposals contained within it are being sought by the Council. Consultation arrangements in respect of the preparation of the Local Development Framework are indicated in part one of the document (sections 2-10). Arrangements in respect of development control are shown in part two (sections 11 – 16). Arrangements for the review of the SCI are described in part three (section 17).

## 2.0 Part One: Local Development Framework

### The New Planning System

- 2.1 Part 2 of the Planning and Compulsory Purchase Act came into force in September 2004. The Act takes forward proposals for the radical reform of the planning system as set out within the Green Paper “Planning: Delivering a fundamental change” (December 2001), the Planning Policy Statement “Sustainable communities – Delivering through Planning (July 2002) and “Making the system work better – Planning at Regional and Local Levels”. (August 2002)
- 2.2 Section 38 of the Act defines the development plan (outside Greater London) as comprising two elements:
- The Regional Spatial Strategy; and
  - Development Plan Documents (taken as a whole)
- 2.3 Also, the Joint Lancashire Structure plan 2001-2016 remains part of the statutory development plan for a period of three years from the date of adoption (31<sup>st</sup> March 2005) subject to the qualifications at paragraph 5.8 of PPS12: Local Development Frameworks.
- 2.4 The Act also requires that planning applications be determined in line with the policies of the development plan (where these are relevant) unless other material considerations indicate otherwise.
- 2.5 Section 1 of the Act indicates that the Regional Spatial Strategy (RSS) must set out the Secretary of States Policies in relation to the development and use of land within the region. Policies contained in the RSS are strategic in nature and would include the scale and distribution of housing, environmental issues, transport, infrastructure, economic development, agriculture, minerals and the treatment and disposal of waste. The RSS is produced by the North West Regional Assembly (NWRA) and the document and the consultation arrangements can be viewed on their website at [www.nwra.gov.uk](http://www.nwra.gov.uk). Procedures for the preparation of RSS include a requirement for the NWRA to produce a statement on the consultation processes undertaken.
- 2.6 Section 17 of the Act requires Councils to prepare Local Development Documents (collectively known as the Local Development Framework)(LDF) in place of the old system of Local Plans. Local Development Documents must be prepared in conformity with the RSS and set out the planning policy framework at the local level.
- 2.7 There are two types of LDDs. Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs).

**2.8 Development Plan Documents** have the status of statutory development plans. DPDs include the following types of document:

- **Core Strategy:** This sets out key elements of the planning framework including a spatial strategy and core policies for the borough. The Core Strategy will reflect the wider policy context provided in the Regional Spatial Strategy for the North West.
- **Site Specific Allocations of Land:** Where land is allocated for specific uses (including mixed uses) this will be contained in individual DPDs. This type of DPD may also contain non-strategic policies relating to the delivery of site specific allocations.
- **Area Action Plans:** Where these are needed (this type of plan is optional) they will provide the planning framework for areas where significant change or conservation is needed.
- **Proposals Map:** This will illustrate the spatial extent of the application of policies contained in other types of DPD.
- **Generic Development Control Policies:** These are likely to be either contained in an individual DPD or in the Core Strategy.

**2.9** DPDs are all subject to an independent examination through an examination process at the end of which a report produced by the Inspector is binding on the Council. The DPD process involves 4 distinct stages. These are :

- **Pre-production** – survey and evidence gathering leading to decision to include a development plan document in the local development scheme;
- **Production** – preparation of preferred options in consultation with the community, formal participation on these, and preparation and submission of the development plan document in light of the representations on the preferred options;
- **Examination** – the independent examination into the soundness of the plan; and
- **Adoption** – the binding report and adoption

**2.10 Supplementary Planning Documents** do not form part of the statutory development plan. They cannot be used to change development plan policies but are intended to elaborate upon existing policies and proposals in DPDs. SPDs may take the form of design guides, area development briefs, master plans or issue based policy documents which supplement existing policies in a development plan document.

- 2.11 Supplementary Planning Documents are not subject to independent examination. Nevertheless the preparation process leading to adoption must involve significant consultation and community engagement, and have regard to the results of that engagement.

### **Sustainability Appraisal**

- 2.12 As part of the process of writing local development documents, Councils must undertake a continuous process of appraisal to identify the social, environmental and economic effects of plans and policies. This is to guide their preparation in such a way as to ensure that they accord with the principles of sustainable development.
- 2.13 The sustainability appraisal process involves five stages which are undertaken at various points within the preparation process of each individual LDD. These are:
- Stage A: Setting the context, establishing the baseline and deciding on the scope of the SA process; (Stage A is undertaken in the LDD pre-production evidence gathering stage.)
  - Stage B: Developing and refining DPD options and assessing effects on sustainability issues;
  - Stage C: Preparing the S A Report;
  - Stage D: Consulting on the DPD and SA Report;
  - Stage E: Monitoring the significant sustainability effects of implementing the DPD.
- 2.14 In section 6 below draft proposals are made as to who will be consulted and how consultation will be undertaken on each type of LDD. Consultation at various stages in the LDD preparation process will also involve contemporaneous consultation on the relevant stage of the SA process.
- 2.15 In circumstances where people making representations to a plan are proposing alternative sites for development, or changes to sites, after the plan has been submitted to the Secretary of State, they must indicate how their proposal complies with the tests of soundness and how the sustainability appraisal process has been or is to be carried out prior to consideration by the Inspector at examination. Inspectors will not consider development proposals which have not been subject to formal sustainability appraisal.

### **3.0 Purpose of the SCI within the new LDF System**

3.1 The Government's Guidance in respect of the new system of Local Development Frameworks is contained (inter alia) in Planning Policy Statement 12 "Local Development Frameworks". This sets out the principles for community involvement. These are:

- i) Community involvement that is appropriate to the level of planning. Arrangements need to be built on a clear understanding of the needs of the community and to be fit for purpose;
- ii) 'Front loading' of involvement. There should be opportunities for early community involvement and a sense of ownership of local policy decisions;
- iii) Using methods of involvement which are relevant to the communities concerned;
- iv) Clearly articulated opportunities for continuing involvement as part of a continuous programme, not a one off event;
- v) Transparency and accessibility; and
- vi) Planning for involvement. Community involvement should be planned into the process for the preparation and revision of Local Development Documents

3.2 The principal benefit of consultation is to ensure that a wide range of people and organisations are involved in the planning process from the beginning in order to improve the process of planning policy making within the borough.

3.3 The benefits of including a wider range of people and organisations in decision making includes:

- Greater public ownership resulting from ability to influence the decision making process;
- A sense of contributing to the community;
- A better understanding of the way services and the Borough work;
- Broader sharing of responsibilities;
- More contribution to problem solving;

- Greater potential for effective and efficient use of resources;
- Helps to identify problems early on, enabling matters to be put right at an early stage before they escalate and result in lengthy inquiries.

3.4 With regard to the preparation of the Local Development Framework, the purpose of the Statement of Community Involvement is to set out a clear public statement which indicates who, how and when people will be involved in the preparation of local development documents, including the related sustainability appraisals. These suggested arrangements are shown in section 6.

3.5 In principle, the consultation philosophy of the Council in relation to the local development framework is to:

- Try to engage with the widest section of the community, including 'hard to reach' groups and to make special efforts to engage those parts of the community who have not previously been involved in the planning process;
- Avoid wasting resources by focussing consultation on those groups and individuals who want to take part in the process;
- Consult with every group or individual who requests it;
- Make best use of the internet and associated electronic methods of making available information and receiving representations; (the availability to and penetration of this form of communication in the community continues to expand very significantly.)
- Make use of and integrating with the activities and consultation framework of the Local Strategic Partnership (LSP) \* where appropriate.
- Put in place a transparent and effective mechanism for considering representations made within the consultation/participation process and reporting back to people the outcome in relation to their representations.

\* The Local Strategic Partnership is a partnership of public, private and voluntary sector organisations established to tackle various key issues in the community including housing, health, regeneration, crime and tourism. Although the Council sits on the LSP it is an independent body separate from the Council.

3.6 The preparation of the SCI is itself subject to statutory procedures included in The Town and Country Planning (Local Development) (England) Regulations 2004. In brief form, these are:

- a) A pre-draft SCI must be the subject of consultation with a number of 'specific consultation bodies' and 'general consultation bodies' under regulation 25. This consultation stage was undertaken in November / December 2005.
- b) Taking account of representations made at the first stage, a second round of consultation and public participation must be undertaken in relation to a draft SCI. This stage (the current stage) involves a second reference to the above bodies and a first reference to the general public, under regulation 26.
- c) A submission draft is prepared for consideration by the Secretary of State. This draft is also to be offered for consultation and public participation under regulation 28.
- d) An independent examination by an Inspector takes place into the soundness of the SCI. (regulation 34)
- e) A binding report is received from the Inspector which will set out precise recommendations in respect of how the Statement of Community Involvement must be changed. (regulation 35)
- f) The Council can then proceed to adoption. (regulation 36)

3.7 At the independent examination stage, in assessing whether the Statement of Community Involvement is 'sound', the Inspector will determine whether the:

- i. local planning authority has complied with the minimum requirements for consultation as set out in the Town and Country Planning (Local Development) (England) Regulations, 2004;
- ii. local planning authority's strategy for community involvement links with other community involvement initiatives e.g. the community strategy;
- iii. statement identifies in general terms which local community groups and other bodies will be consulted;
- iv. statement identifies how the community and other bodies can be involved in a timely and accessible manner;



- v. methods of consultation to be employed are suitable for the intended audience and for the different stages in the preparation of local development documents;
  - vi. resources are available to manage community involvement effectively;
  - vii. statement shows how the results of community involvement will be fed into the preparation of development plan documents and supplementary planning documents;
  - viii. authority has mechanisms for reviewing the statement of community involvement; and
  - ix. statement clearly describes the planning authority's policy for consultation on planning applications.
- 3.8 These are thus the main considerations which should guide consultees in terms of making their responses to the draft SCI.

#### **4.0 Register of Consultees**

- 4.1 The Council wishes to involve the widest possible range of persons and stakeholders, including those groups of people who do not normally engage with the Council as local planning authority (i.e. hard to reach groups). If a wider range of people are able to make a positive contribution to the development of planning policies, this will help to ensure that the process is as inclusive as possible and that policies are ultimately more acceptable, effective and sustainable.
- 4.2 Annex E to PPS 12: Local Development Frameworks (2004) sets out four classifications of consultation bodies. The first classification relates to those bodies who must be consulted in respect of the preparation of a Development Plan Document. These are referred to as Specific Consultation Bodies (SCBs). In the context of Fylde Borough, these bodies are:
- The North West Regional Assembly (the Regional Planning Body)
  - The Countryside Agency
  - The Environment Agency
  - The Historic Buildings and Monuments Commission for England
  - English Nature
  - The Strategic Rail Authority
  - The Highways Agency
  - Preston Borough Council
  - Blackpool Borough Council

- Wyre Borough Council
- South Ribble Borough Council
- Lancashire County Council
- All Parish Councils within and on the borders of Fylde Borough
- North West Regional Development Agency
- Electronic Communications Operators
- Telephone Operators
- Electricity Operators
- Cumbria and Lancashire Strategic Health Authority
- United Utilities

4.3 The second classification of consultation bodies are various government departments, including Government Office for the North West (GONW).

4.4 The third classification is termed 'general consultation bodies'. These include bodies who represent the different racial, ethnic and religious groups and those that represent the interests of business and disabled persons:

- Voluntary Bodies
- Ethnic/Racial/National Groups
- Religious Groups and Churches
- Disabled Groups
- Local Businesses
- Business Support Agencies

4.5 The fourth classification is termed 'other consultees'. These are groups which the Council should consult on a discretionary basis i.e. if the consultation group is relevant to the LDD in hand:

- Health Agencies
- Learning Agencies
- Secondary Schools
- Transport Bodies and Groups
- Sports Clubs/Bodies
- Recreation Bodies

- Nature Conservation/Countryside Bodies
- Design/Townscape/Urban Conservation Bodies
- Infrastructure and Service Providers
- Environmental Groups
- Planning Consultants and Agents
- The Development Industry
- Other miscellaneous bodies

4.6 The Council maintains a register of persons and stakeholders who are consulted, where appropriate, on matters relating to the Local Development Framework. The 'Register of Consultees' contains contact details of all the above types of groups and also includes a list of those private individuals who have expressed a wish to be consulted.

4.7 The Register of Consultees is permanently available on the Council's website and copies are available for inspection at the deposit points along with this document . The Council will add groups and persons to the register at any time if this is requested.

4.8 It will be important to keep the 'Register of Consultees' up-to-date. The Council will do this by:

- Making the appropriate alterations as soon as a change of details is supplied by an individual party;
- Providing a prominent and permanent invitation on the Council's website to be included in the register;
- Undertaking periodic checks to ensure that contact information is up-to-date, by use of the internet and other information sources;
- Taking steps to identify alternative addresses if post is returned.

## 5.0 Reaching All The Community

5.1 Experience has shown that there are many groups and individuals within the borough that are prepared to get involved in the process of planning policy development. Very often these groups have a particular pre-defined agenda to advance, or argument to make and they can be effective in getting their message across. There is a danger therefore that the voice of the less well organised or the silent majority will not be registered during the consultation process. The following techniques will be employed by the Council, within the framework of the consultation philosophy, in order to reduce the barriers with which some people are faced, and thus make the consultation process more inclusive:

- One-to-one meetings will be arranged for those persons who cannot read, or who otherwise cannot or do not like to attend public meetings;
- Large print versions of documents or part documents will be made available for persons who are partially sighted;
- Documents will be made available electronically for the blind and partially sighted people. (This will allow software packages to 'speak' the text of the document on a computer.)
- Translation facilities will be provided for people for whom English is not their first language;
- Information will be placed in a prominent position on the Council's website so that documents and information can be accessed from home, within and outside normal office hours;
- Public meetings will normally be held in the evening to ensure that as many people as possible have a chance to attend;
- The use of posters advertising public consultation events in schools, libraries, supermarkets and in other public places;
- The services of Planning Aid will be indicated to those people who feel that they may need assistance in expressing their views within the consultation process.
- Documents will be written as simply as possible and will avoid unnecessary jargon.
- The LSP will be consulted on the best ways of involving hard-to-reach groups.

## 6.0 LDF Consultation Proposals

- 6.1 The Council will seek to engage with all sections of the community on all aspects of the LDF and will use a variety of techniques as indicated below. A list of different consultation techniques is provided in Appendix 1: 'A Comparison of Consultation Techniques'. The list indicates some of the advantages and drawbacks of each technique and identifies the likely cost implications of each.
- 6.2 In Section 2 the different types of Local Development Document are described. The following paragraphs describe the range of stakeholders who, it is anticipated, will be consulted on each type of document, and the anticipated methods of consultation.
- 6.3 As a central part of the Council's approach to consultation on the Local Development Framework, all parties within the 'general consultation bodies' and 'other consultees' sections of the 'Register of Consultees' will be asked prior to the commencement of each individual LDD if they want to be consulted on it. Consultation will be undertaken with all the parties that request it. If parties indicate that they do not wish to be consulted or do not reply then the Council will infer that they do not wish to be consulted.
- 6.4 Also, parties will be advised of the proposed timetable for preparation for each LDD (as set out in the current Local Development Scheme) so that they can appreciate the whole process and undertake any necessary preparation or planning.

#### Core Strategy DPD

#### Who will we consult

- 6.5 The following parties will be consulted:
- The Specific Consultation Bodies
  - Government Departments
  - All General Consultation Bodies
  - All Other Consultees
- 6.6 As indicated earlier, as a central part of the Council's approach to consultation on the Local Development Framework, all parties within the 'general consultation bodies' and 'other consultees' sections in the 'Register of

Consultees' will be asked if they want to be consulted on the Core Strategy. Consultation will be undertaken with all parties that request it.

#### How and when we will consult

- 6.7 Statutory procedures direct that there will be three stages of consultation and public participation in the preparation period up till the time that the document is submitted to the Secretary of State. In relation to this DPD it is anticipated that the following process will be undertaken:

##### Regulation 25 Consultation

- 6.8 This is the first consultation stage in which the specific consultation bodies and the general consultation bodies (so far as the DPD is likely to affect them) are consulted on issues deriving from the preparation of the evidence base and the preparation of alternative options. This stage does not include wider public participation.

- 6.9 Specific consultation measures anticipated at this stage include:

- Written consultations with the relevant specific consultation bodies and general consultation bodies;
- Invitations to meet with any of the relevant consultation groups to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
- Presentation to and discussion of issues and options document with all the relevant LSP Theme Groups.

##### Regulation 26 Consultation

- 6.10 This is the second consultation stage which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted.

6.11 Specific consultation/participation measures anticipated at this stage include:

- Written consultations with the relevant 'specific consultation bodies' and 'general consultation bodies';
- Written consultations with the 'other consultation bodies' who have indicated an interest in being consulted;
- Presentation to and discussion of the submission document with the LSP Enterprise and Employment, Community Safety, Health and Social Wellbeing, Environment and Lifelong Learning Theme Groups.
- Putting the preferred options document on the Council's website, and making copies available at council offices, public libraries and other deposit points as appropriate;
- Inviting public comment on the preferred options document through press advertisements, press releases and a prominent invitation on the Council's website.
- Invitations to meet with any of the relevant consultation groups or members of the public to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
- The holding of public meetings and/or workshops led by professional facilitators (if this is felt by any party to be particularly useful);
- Consultation with LSP Citizens' Panel if this is felt necessary.

Regulation 28 Consultation

6.12 This is the third consultation stage with the community and stakeholders which will consider the contents of the DPD at the time it is submitted to the Secretary of State.

6.13 Specific consultation/participation measures anticipated at this stage include:

- Written consultations with the relevant 'specific consultation bodies' and 'general consultation bodies';
- Written consultations with the 'other consultation bodies' who have indicated an interest in being consulted;

- Presentation to and discussion of the submission document with the LSP Enterprise and Employment, Community Safety, Health and Social Wellbeing, Environment and Lifelong Learning Theme Groups.
  - Putting the submission document on the Council's website, and making copies available at council offices, public libraries and other deposit points as appropriate;
  - Inviting public comment on the submission document through press advertisements, press releases and a prominent invitation on the Council's website.
  - Invitations to meet with any of the relevant consultation groups or members of the public to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
- 6.14 A consultation period of four weeks will apply to the Regulation 25 consultation and a period of six weeks will apply to each of the other consultation stages.
- 6.15 The Council is currently in early discussions with Blackpool and Wyre Borough Councils with a view to phasing preparation of all the core strategies at the same time. This will help to reconcile the strategies and pursue a joined-up and co-ordinated approach to the planning of the Fylde sub-region. Throughout all the consultation stages therefore, particular attention will be paid to consultations with those other local planning authorities.
- 6.16 Such an approach may require the undertaking of some cross-border or joint consultation exercises. This will be considered at a later stage.

Site Specific Land Allocations DPDs &  
Area Action Plans

Who will we consult

- 6.17 The following parties will be consulted:
- The Specific Consultation Bodies to the extent that the Council thinks that the proposed subject matter of the DPD is relevant to the body and to those bodies which request consultation in response to an approach by the Council.



- Government Departments to the extent that the Council thinks that the proposed subject matter of the DPD is relevant to the Department, and those Departments which GONW advise the Council to consult.
- General Consultation Bodies to the extent that the Council thinks that the proposed subject matter of the DPD is relevant to the body and to those bodies which request consultation in response to an approach by the Council.
- Other Consultees to the extent that the Council thinks that the proposed subject matter of the DPD is relevant to the body and to those bodies and individuals which request consultation in response to an approach by the Council.

#### How and when will we consult

- 6.18 Statutory procedures direct that there will be three stages of consultation and public participation in the preparation period up till the time that the document is submitted to the Secretary of State. In relation to this type of DPD it is anticipated that the following process will be undertaken:

#### Regulation 25 Consultation

- 6.19 This is the first consultation stage in which the specific consultation bodies and the general consultation bodies (so far as the DPD is likely to affect them) are consulted on issues deriving from the preparation of the evidence base and the preparation of alternative options. This stage does not include wider public participation.
- 6.20 Specific consultation measures anticipated at this stage include:
- Written consultations with the relevant specific consultation bodies and general consultation bodies;
  - Invitations to meet with any of the relevant consultation groups to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
  - Presentation to and discussion of the issues and alternative options document with the LSP Enterprise and Employment Theme Group.

## Regulation 26 Consultation

6.21 This is the second consultation stage which relates to the production of a preferred options document and the related Sustainability Appraisal Report. At this stage, the bodies consulted under regulation 25 are re-consulted and wider public consultation is undertaken together with those other consultation bodies which request to be consulted.

6.22 Specific consultation/participation measures anticipated at this stage include:

- Written consultations with the relevant 'specific consultation bodies' and 'general consultation bodies';
- Written consultations with the 'other consultation bodies' who have indicated an interest in being consulted;
- Presentation to and discussion of preferred options document with relevant LSP Theme Groups.
- Putting the preferred options document on the Council's website, and making copies available at council offices, public libraries and other deposit points as appropriate;
- Inviting public comment on the preferred options document through press advertisements, press releases and a prominent invitation on the Council's website.
- Invitations to meet with any of the relevant consultation groups or members of the public to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
- The holding of workshops/public meetings led by professional facilitators if this is felt by any party to be particularly useful. This consultation method may be particularly useful in relation to the preparation of Area Action Plans where public interest in the DPD is high.
- Consultation with LSP Citizens' Panel if this is felt necessary.

## Regulation 28 Consultation

- 6.23 This is the third consultation stage with the community and stakeholders which will consider the contents of the DPD at the time it is submitted to the Secretary of State.
- 6.24 Specific consultation/participation measures anticipated at this stage include:
- Written consultations with the relevant 'specific consultation bodies' and 'general consultation bodies';
  - Written consultations with the 'other consultation bodies' who have indicated an interest in being consulted;
  - Presentation to and discussion of the submission document with relevant LSP theme groups;
  - Putting the submission document on the Council's website, and making copies available at council offices, public libraries and other deposit points as appropriate;
  - Inviting public comment on the submission document through press advertisements, press releases and a prominent invitation on the Council's website.
  - Invitations to meet with any of the relevant consultation groups or members of the public to discuss particular issues, if they feel that their concerns cannot adequately be conveyed in writing;
- 6.25 A consultation period of four weeks will apply to the Regulation 25 consultation and a period of six weeks will apply to each of the other consultation stages.

## Supplementary Planning Documents

### Who will we consult

- 6.26 The following parties will be consulted:
- The Specific Consultation Bodies to the extent that the Council thinks that the proposed subject matter of the SPD is relevant to the body.

- GONW and those Departments which GONW advise the Council to consult.
- General Consultation Bodies to the extent that the Council thinks that the proposed subject matter of the SPD is relevant to the body and to those bodies which request consultation in response to an approach by the Council.
- Other Consultees to the extent that the Council thinks that the proposed subject matter of the SPD is relevant to the body and to those bodies and individuals which request consultation in response to an approach by the Council.

How and when will we consult

6.27 Statutory procedures and guidance indicate that there will be two rounds of consultation and public participation to be undertaken during the preparation period. The first stage is an informal stage during the preparation of the draft document. The second is the formal (Regulation17) stage consultation on the published draft SPD.

6.28 Prior to commencement of the document, the Council will write to all the parties within the 'General Consultation Bodies' and the 'Other Consultees' sections of the Register of Consultees in order to determine which parties wish to be consulted on the preparation of the document.

6.29 The informal stage is likely to include:

- Engagement with relevant local communities and stakeholders to discuss the particular issues proposed to be contained in the draft document and the development of policies.

6.30 The formal (Regulation17) consultation stage is likely to include:

- Written consultations with all the consultation groups listed above (in paragraph 6.26) including any private individuals who have indicated a request to be consulted on the draft SPD;
- Invitations to meet with any consultation group or individual to discuss particular issues of the draft document;
- Presentation to and discussion of the draft document with the LSP Environment Theme Group;

- Consultation with LSP Citizens' Panel if this is considered necessary;
- Putting the draft SPD on the Council's website, and making copies available at council offices, public libraries and other deposit points as appropriate;
- Inviting public comment on the draft SPD through press advertisements, press releases and a prominent invitation on the website.

6.31 The consultation exercise will also relate to any sustainability appraisal of the draft SPD, (depending on whether sustainability appraisal is relevant to the preparation of the particular SPD).

6.32 A consultation period of between four weeks and six weeks will apply to this consultation stage.

## **7.0 Co-ordination of Community Involvement**

7.1 "The Council has responsibility for the preparation and production of a large number of different strategies on various issues and topics. Such strategies are prepared by different business units within the Council.

7.2 Also, the Local Strategic Partnership (LSP) is responsible for preparation of the Community Plan and other related strategy work.

7.3 Greater co-ordination of strategy production within the Council and between the Council and the LSP would make much sense. This would have two main advantages: First of all, it should lead to more joined-up and complementary strategies in terms of their objectives, content and usefulness. Secondly, it may allow consultation procedures on different strategies, where there is clear synergy between them, to be undertaken jointly. This itself could reduce workload for the teams involved, could save costs and could reduce the demands placed on the community and other stakeholders.

7.4 The programming of strategy preparation within the Council will derive from the wider process of priority setting and service planning which is already undertaken by Council leaders and senior management. As part of these processes, it is proposed to undertake and publish an annual 'Statement of Cross-cutting Work' which will:

- Consider envisaged broad programmes of work (over the next three years) planned to be undertaken by the separate Council business units (including reference to the Council's Local Development Scheme) to see whether there is scope for planned inter-unit working or synchronizing of projects.
- Consider respective programmes of work for the forthcoming year to see if there are items which would have a significant relationship or synergy;
- Consider whether such items could benefit from joint working or joint consultation;
- Review any inter-unit working in the previous year with a view to analysing whether arrangements or procedures could have been improved.

7.5 With regard to co-ordination of Council strategy work and that undertaken by the LSP, including any review of the Community Plan, it is proposed that both parties prepare jointly, on an annual basis a 'Statement of Complementary Working' which would:

- Consider envisaged broad programmes of work of both bodies (including reference to the Council's Local Development Scheme) to see whether there is scope for planned joint working or phasing of projects.
- Consider respective programmes of work for the forthcoming year to see if there are items which would have a significant relationship or synergy;
- Consider whether such items could benefit from joint working or joint consultation, including reference of matters to the LSP Citizen's Panel;
- Review any joint working in the previous year with a view to analysing whether arrangements or procedures could have been improved."

7.6 The above formal arrangements should provide the optimum conditions to achieve the advantages of joint working and joint consultation indicated above."

## **8.0 Reporting Back**

- 8.1 If the community's interest and trust is to be secured, it is vitally important that the Council shows how comments received have been considered and acted upon. To help achieve this transparency, all consultation responses received, in relation to both DPDs and SPDs will be acknowledged, and will be published within a 'Consultation Statement'. Statements will be published after each consultation stage.

### The statements will identify:

- Who has been consulted and who has replied;
- The consultation methods used;
- The number and substance of the representations;
- Those changes to the document which are proposed on the basis of representations received;
- The reasons why some suggested alterations cannot be accepted by the Council. (Where suggested alterations are rejected by the Council, persons will be able to pursue these through the examination process with an independent Inspector.)

- 8.2 A copy of the Consultation Statement will be sent to every person or body making representations.

## **9.0 Weight to be given to Community Representations**

- 9.1 Whilst the government's objectives are to increase the input into planning from the community, and the purpose of community involvement is to try to seek a consensus on particular issues, quite often, diverse views will emanate from within the community such that it is not possible to satisfy all parties.
- 9.2 Also, it is often the case that objections to planning proposals are submitted which are based on non-planning issues which the Council is unable to take into account. Examples of such non-planning issues are: impact on the value of property, concern about business competition, disputes about land ownership, loss of a view, or concerns over disturbance during construction.
- 9.3 Sometimes, where large-scale local public opposition to proposals has been demonstrated, and a decision has had to be taken by the Council, contrary to the majority public view, there are comments that such a decision is 'undemocratic'. However, planning decisions have to take into account many factors including national and regional policy and matters which weigh in the public interest of the wider community (for instance, the need for a

development). Sometimes these factors are not understood or recognised by the community.

9.4 For these reasons, community views are only one consideration and cannot always be determinative in planning matters. Decisions have ultimately to be made by the elected members of the Council (up to submission stage) and the Inspector appointed to examine the soundness of the plan (at examination stage) having regard to all considerations, including those views expressed by the community.

9.5 At all stages of community consultation (involving the general public) the Council will attempt to explain both the value of and limitations to the consultation process, particularly with regard to the matters referred to above.

## **10.0 Resource Implications**

10.1 Fylde Borough Council is a small shire district council and has very limited resources in terms of both staff and available finance. However, the Council is committed to effective community involvement in the areas of planning policy development and development control.

10.2 With regard to preparation of the Local Development Framework, the Council is conscious of the following matters:

- Community involvement can be resource intensive in terms of both officer time and money;
- There is a balance to be struck between additional community involvement and keeping document preparation periods to timetable;
- There is a balance to be struck between the likely benefits to be attained through greater community involvement and the additional financial costs involved;
- Past experience demonstrates that there is a high degree of reluctance on the part of some people to become involved in the planning process, unless they have a particular objection or agenda to progress.
- On the plus side, any additional costs arising from greater community involvement could be offset by the changes introduced as part of the new planning system. In particular, the replacement of long local plan inquiries with a more streamlined system of



independent examination, and the introduction of binding Inspectors' Reports should help to shorten the preparation process.

- 10.3 The programme of community engagement in relation to each Local Development Document indicated earlier in this statement, has been designed to have regard to the above factors.
- 10.4 Whilst, in general the consultation process as outlined in this statement should be capable of being implemented within the staffing and financial constraints currently available, if the need arises for one-off special consultation events e.g. professionally run 'workshops', this may require additional resources not currently included in the budget.
- 10.5 Additionally, the Council is soon to invest in a new computer software system for organising and handling representations made within the LDF process. This will help to more efficiently administer the greater process of community engagement proposed within this document. This will be paid for out of 'planning delivery grant' monies.
- 10.6 In line with sound management practice, the Council will monitor the financial costs of community engagement, and during the annual budget allocation process will make the appropriate resources available to meet the programmes outlined in this document.

## 11.0 Part Two: Development Control

## **Purpose of Statement of Community Involvement in Development Control**

- 11.1 The requirements relating to publicity for planning applications are set out in a number of legislative documents, including:
- The Town and Country Planning (General Development Procedure Order) (1995) as amended; (see Appendix 2)
  - Circular 15/92 Publicity for Planning Applications;
  - The Town and Country Planning Environmental Impact Assessment Regulations 1999; and
  - The Town and Country Planning (Major infrastructure Project Inquiries Procedure) (England) Rules 2004.
- 11.2 The above documents set out a minimum requirement to consult in certain circumstances, however, the Council is committed to ensuring that any group or individual that may be interested or affected by a proposed development has the opportunity to comment on the planning application. Accordingly, in addition to carrying the minimum requirements set out in legislation, the Council will carry out further consultations in order to ensure that the views of the wider community are considered in the determination of a planning application.

## **12.0 Who How and When Will We Consult**

- 12.1 The Borough Council will continue to publicise applications in various ways to meet its objective of involving the community in the planning application decision-making process. These are as follows:
- A copy of the application will be sent to the appropriate Town or Parish Council;
  - A copy of the application will be sent to each consultee as set out in The Town and Country Planning (General Development Procedure Order) (1995) as amended; (See Appendix 2)
  - A weekly list of applications received will be sent to local interest groups who have expressed an interest in receiving details;
  - A weekly list of applications received will be sent to local libraries, Council Offices and other public facilities for display in those premises
  - Occupiers of properties having a common boundary with the application site will be written to advising them of the application;
  - Details of all planning applications, including submitted drawings and supporting documents will be made available through the Borough Council's Website;
  - Copies of all planning applications will be made available through the Council's Customer Contact Centres.

In addition to the above, certain applications will be advertised by site notice and press advertisement, ie:

- Applications defined as major development (10 or more dwellings or development creating 1000 square metres of floor space or more);
- Applications subject to Environmental Impact Assessment;
- Applications which, if approved, would be a departure from the development plan;
- Applications affecting public rights of way;
- Development affecting Listed Buildings, or their setting; and
- Development affecting Conservation Areas.

12.2 Where there is open land, such as agricultural land, next to the application site, site notices will also be posted.

12.3 You do not need to have received a consultation letter to make a comment on a planning application.

### **13.0 Reporting Back**

13.1 The local planning authority must determine any planning application that it receives in accordance with the development plan in force in the area, together with any other material considerations. Although the views of statutory consultees and neighbours are a material consideration, they are only one consideration in the determination of a planning application. In addition, when determining planning applications, the Council may only take into account views that are valid planning considerations. Issues such as loss of view or devaluation of property are not valid reasons for refusing planning permission and cannot, therefore, be taken into account.

13.2 When an application is determined any comments received from interested parties will be summarised in the officers' report. The officers' report will clearly state how the issues that have been raised have been addressed in reaching the final recommendation.

13.3 If you comment on a planning application, we will acknowledge the receipt of your comments. Once a decision is made on a planning application we will undertake to advise you of the decision of the Council on that application. We will also publish details of decisions on the Council's website.

13.4 If an appeal against the Council's decision is submitted we will notify all interested parties of the appeal in order that they may comment further to the Planning Inspectorate.

13.5 In addition to consulting on individual planning applications, the Borough Council seeks feedback from customers on the way the planning service is provided. We do this in the following ways:

- Seminars for Parish Councils;
- A focus group for planning agents (architects, surveyors and others who regularly submit applications); and
- Questionnaire surveys for applicants and agents.

13.6 The feedback is used as part of the regular monitoring and review of planning services.

#### **14.0 Approved Scheme of Delegation**

14.1 The Government encourages local planning authorities to determine as many applications as possible under delegated powers and has set a target of determining 90% of applications in this way. This means that the application will not go before the Development Control Committee ( Local Councillors ).

14.2 As the majority of planning applications that are submitted to the Council are for relatively minor works or uncontroversial projects, these applications will normally be determined by the Built Environment Business Unit Manager under an approved scheme of delegation. The Approved Scheme of Delegation, which sets out those applications that may be determined in this manner, is published on the Council's Website and details of the scheme are available in a separate leaflet (see Appendix 3).

#### **15.0 Development Control Committee**

15.1 Applications for major or controversial development will normally be determined by the Development Control Committee. The Committee, which is composed of a group of 15 elected Local Councillors, usually meets every three weeks.

##### Speaking at the Development Control Committee

15.2 In 2003 the "Right to Speak" was introduced at the Development Control Committee. This gives members of the public the opportunity to comment on those applications determined by Committee, either in support or as an objector. In order to ensure the workload of the Committee can be expedited efficiently, speakers are limited to 3 minutes. Councillors then consider these comments in determining the application.

15.3 Details regarding your right to speak at the DC Committee can be found in a separate leaflet and on the Council's Website (Appendix 4)

## **16.0 Resource Implications**

- 16.1 The Council is committed to effective community involvement in development control. This commitment has been demonstrated through the Council's recent investment in new Information Technology which will allow the progress of planning applications to be tracked via the internet and comments to be made by e-mail. As the Council receives over 1,300 applications per annum, the degree of publicity for each application must be balanced against the costs.
- 16.2 With regard to publicity for planning applications, the Council is conscious of the following matters:
- The level of neighbour notification should be proportional to the scale of the proposed development;
  - The Council cannot take into consideration matters which the Courts have ruled are not material to the planning process;
  - There is a balance to be struck between the likely benefits to be attained through greater community involvement and the additional financial costs involved.
- 16.3 The provisions for publicity for planning applications has been designed to have regard to the above factors.

## **17.0 Part Three: Review**

### **Review of The Statement of Community Involvement**

- 17.1 This Statement of Community Involvement has been prepared to identify the arrangements for consultation and community engagement in the preparation, alteration and continuing review of all local development documents and planning applications. It is hoped that its provisions will guide these processes for a number of years.
- 17.2 Nevertheless as a responsible authority seeking always to improve methods and standards, the Council will undertake the following actions to ensure that the SCI is kept up-to-date and is as relevant and effective as possible:
- 17.3 It is not proposed to review the SCI at a pre-determined frequency (e.g. every three years). Rather, it will effect a review only when significant changes have occurred in the types of groups which the Council wishes to engage, or different techniques for engagement are to be deployed. Self evidently if changes in legislation or government advise are made, then this may lead to the need for review.
- 17.4 Additionally, after the adoption of each Local Development Document, the Council proposes to contact each stakeholder and consultee involved in the process with a view to asking them whether the consultation arrangements were satisfactory, or whether they could have been improved.
- 17.5 In relation to the development control process, the Council will raise the issue of consultations at its forums with parish councils and planning agents.
- 17.6 Where responses lead the Council to consider that arrangements need to be changed significantly, these will be incorporated in the SCI within a review.
- 17.7 If or when a review does become necessary, the procedures for review will follow the same procedures as for the preparation of this first statement.
- 17.8 The Council's 'Register of Consultees' will be continuously up-dated with an open invitation to people to be entered onto the register placed in a prominent position on the Council's website.

# REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	8 <sup>TH</sup> JUNE 2006	7

## FYLDE ECONOMIC DEVELOPMENT AND INDUSTRIAL LAND STUDY

### Public/Exempt item

This item is for consideration in the public part of the meeting.

### Summary

GVA Grimley has been commissioned by the Council to undertake a two stage piece of work to advise on the state and characteristics of the local economy and subsequently to advice on courses of action to support and develop the economy.

This report presents a draft of the consultant's Stage 1 Report in relation to the first element of that work for consideration by this Committee before it is presented to Cabinet for formal acceptance.

### Recommendation/s

1. That Committee considers the conclusions of the consultant's report as expressed in the executive summary and conclusions papers which are attached to this committee report as Appendix 2.

### Cabinet Portfolio Development and Regeneration (Councillor Roger Small)

### Report

#### Background

1. The Committee will be aware that the Council has included the preparation of a 'business and industrial land allocations development plan document' in the current version of the Council's Local Development Scheme (LDS). The LDS identifies all the

Continued....

local development documents (DPDs) which the Council proposes to prepare over future years.

2. As part of the evidence base required to underpin the DPD, the consultants GVA Grimley have been commissioned to undertake a two stage piece of work.
3. The first stage is to make a comprehensive assessment of the local economy of the borough. The issues contained in the project brief given to the consultants for consideration within the stage 1 work are identified in Appendix 1. This has previously been agreed with the Cabinet Portfolio holder.
4. This work is now nearing completion and a draft Stage 1 Report has been received. The executive summary and conclusions from the draft report are attached as Appendix 2.
5. The purpose of this report to Committee is to present the main findings for discussion prior to agreeing the content of the final report and reporting this to Cabinet. Representatives from GVA Grimley will attend the meeting in order to present the main findings of their work.
6. The second part of the study will be based on the findings of the first part. This has not yet been undertaken but will involve the development of an economic development and land use strategy for the period to 2016. This will include potential recommendations in terms of:
  - Land use and related planning actions (to inform the proposed DPD);
  - Other non-planning based corporate actions and interventions.
7. If Members want a copy of the full 245 page report this can be e-mailed on request.

Implications	
Finance	No direct implications of this stage of the work.
Legal	The work will inform the preparation of the DPD. The preparation of a competent evidence base is a legal requirement.
Community Safety	No direct implications.
Human Rights and Equalities	No direct implications.
Sustainability	No direct implications at this stage.
Health & Safety and Risk Management	No direct implications.

| | |



Report Author	Tel	Date	Doc ID
Anthony Donnelly	(01253) 658610	May 2006	

List of Background Papers		
Name of document	Date	Where available for inspection
Employment Land and Economic Development Strategy. Stage 1 Draft Report.	April 2006	Local Plans Section, St Annes Town Hall.  Report available electronically by request. Contact tonyd@fylde.gov.uk

### **Attached documents**

Appendix 1: Issues identified in the Stage 1 project brief.

Appendix 2: Executive summary and conclusions of consultant's report.

## **ECONOMIC DEVELOPMENT AND EMPLOYMENT LAND STUDY**

### **Extract from Project brief**

Consultants will be required to undertake a two-part study.

The first part will be to make a comprehensive assessment of the local economy of the borough. The assessment should:

1. have regard to all relevant matters, including the following:
  - Economic Activity
  - Business Stock
  - Employment/Unemployment
  - Earnings
  - Travel to work patterns
2. compare the Fylde economy to the wider situation in Lancashire and the North West;
3. evaluate the current contribution of the key sectors and industries relevant to the borough and provide a prognosis of how those sectors/industries will continue to contribute to the local economy in future years;

The key sectors and industries will include:

- aerospace industry with particular reference to BAe;
- assurance/insurance industry with particular reference to Axa and Aegon;

- nuclear fuels industry with particular reference to BNFL;
  - food industry with particular reference to Fox's Biscuits and Kepak;
  - tourism industry.
4. assess whether the local economy is particularly susceptible to potential change (and the likely degree of susceptibility) given the reliance on a small number of large firms;
  5. assess the future demand for business and industrial land and premises in the period to 2016. This part of the exercise should incorporate the guidance and approach contained in Stages 1 and 2 of the ODPM Guidance Note – Employment Land Reviews (Dec 2004).
  6. review the supply of business and industrial land and premises in the borough, including the distribution, location, type, amount, and viability / marketability of the undeveloped land currently available for business and industrial purposes. This part of the exercise should incorporate the approach contained in Stages 1 and 2 of the ODPM Guidance Note – Employment Land Reviews (Dec 2004). This review should include:
    - an assessment of whether the loss of business and industrial land in the borough over recent years has had a significant impact on the local economy;
    - an assessment of whether the potential loss of further business and industrial land at Dock Road/Preston Road, Lytham has had or will have a significant impact on the local economy;
    - if the land at Dock Road/Preston Road is lost to business and industrial use, whether there is a need for any compensatory business and industrial land allocations should be made in principle.
  7. appraise the current local plan policy (Policy EMP 2) on the retention of business and industrial land and assess whether the areas subject to the Policy are appropriately protected and whether other areas should be so protected;
  8. assess whether the current planning restrictions (Supplementary Planning Guidance) on new market housing development are harming, or likely to harm the development of the local economy, and if so, the degree of that harm;
  9. determine whether the highway network is a significant constraint to the further development of the local economy;
  10. assess the likely effect on the local economy of the proposed expansion of operations at Blackpool Airport;
  11. assess the condition of the rural economy;

12. assess the condition of the tourism economy including the likely effect on the local economy of regeneration proposals in Blackpool (including casino proposals);

The above assessment should be based on existing published sources of information. The consultant should determine whether further primary data would be required to significantly improve or complete the assessment.

# **Fylde Borough Council**

## **Employment Land and Economic Development Strategy**

**Stage 1 Report**

**Draft for Comment**

**April 2006**

reference: \\mcrdata\data\PDR\WP04000\Current Jobs\Fylde Borough Council\Economic  
Development and Employment Land Study\Report\Revised Report\rmxl-21-04-  
06(draft)nzs amends26-04-05.doc

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## **Executive Summary**

The forthcoming period is one of considerable opportunity for the borough. The prognosis is one of an economy which is diversifying, broadening and most importantly growing its employment base. Over the forthcoming period the traditional advanced manufacturing (aerospace) and nuclear fuel reprocessing industries will remain important sectors in terms of overall employment, however they will be joined by emergent sectors such as computer and business services and the growing tourism economy and visitor market. Overall employment growth is forecast at some 4,600 jobs and this represents a significant increase over the level currently available in the employment market.

Further employment opportunities exist in relation to the development of Blackpool Airport which is pursuing an aggressive expansion strategy in terms of its route destination offer. With passenger numbers set to reach the half million mark this year the potential for employment gains is profiled in this report. We estimate that there is potential for up to 1,200 jobs to be created directly and indirectly as a result of the airports expansion.

The regeneration of Blackpool has the potential to lever major additional benefits for Fylde borough. The ambitious resort masterplan contains visionary proposals for a regional casino, conferencing facilities and hotel development among other uses. While it is an early stage in the implementation of the masterplan, the economic benefits for Fylde borough have been assessed.

The tourism sector provides a particular area of opportunity for Fylde borough and one upon which it can distinguish itself through the quality of its visitor offer. Currently the value of this sector is some £116.5 million annually. This report contains reference to specific market opportunities which could be exploited in order to generate higher levels of visitor trips, overnights stays and associated expenditure in the economy. The employment forecast projects employment creation across business sectors associated with tourism and the visitor market, attesting the growing contribution that this sector will make to the economy. This is a welcome trend and one which will help the borough to reduce its economic exposure to employment in the aerospace and nuclear fuels sectors.

Undoubtedly, the ability of the borough to realise these commercial and tourism related opportunities is contingent upon its ability to deliver an appropriate and

sufficient supply of quality employment land. This study uses published and bespoke economic intelligence in order to estimate the broad quantum of land that is required in the period to 2015. It is estimated that some 28 hectares of employment land will be required in the period 2005-2015 in order to successfully retain and attract investment and employment at the levels forecast. This is an estimate at a specific point in time, and the Council will need to continue monitoring take-up of employment land under a plan, monitor and manage approach to provision.

The ability of the borough's current supply of employment sites to absorb this level and type of demand has been assessed along with a range of site sustainability criteria. At a headline level there appears to be a sufficient quantum of employment land to absorb demand however the supply of sites is constrained and there is no margin for expansion in demand over and above that forecast.

The effects of losses to employment land have been assessed on the overall economic performance of the borough. It is concluded that while this cannot be claimed to have directly constrained previous rounds of investment or employment growth, it has undoubtedly contributed to the current "tight" supply position.

In the event of further losses to employment land, it is estimated that the borough's ability to retain existing businesses and to attract new firms to the area will be significantly diminished.

A qualitative assessment of the available supply suggests the stock of sites and premises lacks commercial appeal to the target growth sectors and exhibits a range of environmental disincentives to investment. The existing supply of sites has been assessed as largely comprising "general industrial sites", many of which are poorly located in relation to sustainable transport networks and which suffer from low grade and poorly maintained environments. This supply is unlikely to appeal to the type of occupiers that will generate employment in the emerging sectors of computer services, business and professional services. Further the scope for redevelopment of these sites is constrained by their classification as suitable for general industrial, distribution and warehouse uses. It is concluded that there is a qualitative mismatch between supply of employment sites and anticipated sectoral demand relating to office based businesses. This stands out as a principal challenge for the borough to overcome in realising its full growth potential in the period to 2015.

## 14 Conclusions

- 14.1 This section is structured to provide a brief summary of the conclusions reached in relation to each of the 12 points raised in the study brief. Detailed responses are provided in the main body of the report and this should provide a point of detailed reference.

### **Point 1: The characteristics of the economy**

There are strong links between the Fylde Coast authorities in terms of travel to work patterns, employment and household migration. There is also a strong secondary relationship with Preston, particularly in terms of travel to work and access to employment opportunities.

Fylde is clearly a borough with an employment role in the wider City Region and this is proven by travel to work statistics. The forecasts contained in this report will demonstrate that the borough has a significant role to play in the future economy of Lancashire and the North West. Planning for sustainable development through an appropriate supply of sites and premises is therefore of significance in the wider sub-regional context.

The characteristics of the economy have been assessed in relation to employment trends, the business base, the labour force and income levels. Summary results are presented below.

### **Employment**

Employment within Fylde is dependent on a small number of sub-sectors – significantly on aerospace and nuclear processing, indicating a highly polarised economy. Also, a large proportion of employment within the borough is concentrated in industries integrated with these two key sub-sectors, highlighting the high dependency of the local economy.

There has been a downturn in aggregate employment since 1998, compared to an upward trend across the North West and Great Britain, representing an increasing gap between Fylde and the wider comparators.

Linked to this, the largest loss of jobs in absolute numbers is found to be in the 'manufacture of transport equipment' sector, made more acute by the dependence of the local economy on this sector, and metal manufacturing. However, significantly,



both 'insurance' and 'public administration' sectors also saw a fall in job numbers. In addition, notable losses were found in the 'food and beverages' and 'recreational, cultural and sporting activities' sectors.

Worryingly for the local economy, it is the sectors which demonstrate above average concentrations that appear to be losing the most jobs. In some cases this can be linked to wider trends of consolidation, but in all cases it has implications for the health of the Fylde economy.

### **Business Base**

There is an assumed small decrease in business units across Fylde between 1998 and 2003. Losses in VAT registered stock over the period in question across Fylde is linked to the downsizing of businesses rather than a real reduction in the business base, also in part contributing to the decrease in employment over the period.

Sectorally, the more significant changes in VAT registered businesses are associated with losses in retail, construction, manufacturing and the public sectors, with growth in business services.

### **Labour force**

Fylde has seen population growth in excess of the North West, in contrast to the general economic fortune over the same period. Within this population increase, there has been a significant growth in the older population, linked to the attractiveness of the borough as a retirement location. This is seen as a long-term threat to the local economy.

Net in-migration to Fylde from all of the local authorities in the sub-region except Lancaster. The most significant in-migration into Fylde comes from Blackpool, Wyre, and Preston. These movements are linked to the wealth of quality transport infrastructure, and the propensity to live and work within the sub-region, with commuting to work within and between the four local authorities common.

The labour force appears to be working at full capacity – employment levels have not seen significant reductions, illustrating a buoyant economy despite weakening performance in employment terms – exemplified by levels of economic activity, self-employment, and skills within the labour force.

## **Incomes**

The high wages recorded make the authority an attractive location for neighbouring residents. When combined with the tight labour market, which is operating within the Authority, there is a perceived premium on wages in the Authority area. This may be attracting a lot of competition for local employment opportunities outside Fylde

### **Point 2: The performance of the economy compared to Lancashire and the North West**

On the basis of the results of a bespoke employment and labour force forecast prepared for this commission, Fylde should expect to perform well above average over the next 10 years or so although this is pending stability within two key sectors of aerospace and nuclear fuels largely underpinning this trend. Total GVA is expected to increase by about 33% compared to 27% nationally and 23% regionally by 2015.

Overall forecast employment growth for Fylde is expected to be significantly above the average at nearly 11% by 2015; this is twice the national average rate of growth and three times the regional rate of growth for the same period. This is by any standards a very significant result both in terms of output and employment and contrasts with the analysis over the last 5 years where Fylde has struggled with jobs lost from the Aerospace industry in particular.

### **Point 3: Contribution and Prognosis for Key Sectors**

A series of interview have been held with key sectors represented in the borough. The findings of the consultation process are summarised below and serve to demonstrate a level of in-built exposure to downsizing in the activities of national companies operating in the borough:

- The major employers interviewed have strong local labour force links, both within the borough and with adjacent local authorities;
- There are acute labour market difficulties associated with filling job opportunities at both managerial level and lower skills occupations. The labour force supply problems relating to low income jobs is perceived to have been caused by prohibitively high house prices in the locality and the unwillingness of low paid workers to travel to access employment;

- All companies interviewed are part of larger, national organisations and the long term viability of their operations is contingent upon decision making taken outside the region. The long term viability of major employers is related to efficiency gains that can be made in addition to their ability to apply knowledge and innovation to traditional manufacturing processes and products;
- In pursuit of efficiency gains it is likely that some industries may restructure in the medium to long term with implications for employment levels within the borough;
- The companies interviewed perceive the supply of sites and premises available within the borough to be constrained. There is a shared opinion that development and investment is likely to occur on existing sites and through making more efficient use of existing premises.

A bespoke econometric forecast was commissioned from Cambridge Econometrics in order to project employment and labour force trends at business sector level. The main conclusions arising from this analysis are presented below:

- The economic prognosis for Fylde Borough is positive. The forecasts at every level indicate a prospect of above average growth for Fylde. This contrasts with more recent trends where the Authority area has struggled to maintain employment in its key sector (ie Aerospace).
- Aerospace is expected to provide favourable opportunities to those economies that are fortunate to hold the growing parts of the industry – for others (e.g. training) then the prospects are far more volatile and risky. The fact the employment is forecast to grow in this sector would suggest that Fylde contains parts of the aerospace industry which remain competitive in an increasingly competitive global market place.
- The picture is mixed nationally with GVA growth expected to be about the national average over the 10 years and employment to decline by 15%. The results projected for Fylde are therefore not insignificant.
- The broader spread of forecast growth, especially within the IT and tourism sectors, clearly needs to be built upon as a means to diversifying the economy and thereby providing more ready means of supporting economic stability. Essentially a diversified economic structure will help to insulate the borough

against any adverse change within the Aerospace and / or Nuclear Reprocessing industries – upon which it currently relies heavily in terms of employment and value added.

- The IT and tourism sectors have individual property, locational and labour force requirements which will need to be planned for if the Borough is to capture and optimise its economic growth potential over the forthcoming period. These requirements are very different to the accommodation requirements of the manufacturing sector which have traditionally been the mainstay of the local economy.

#### **Point 4: Susceptibility and Economic Exposure**

- 14.2 The economic analysis presents a picture of an economy which is dependent on a very few sub-sectors, where employment concentration levels are significantly in excess of the national average. The local economy is currently highly polarised, with few sub-sectors with employment levels around the national average.
- 14.3 The two key sub-sectors in terms of employment concentrations are aerospace and nuclear processing. There are other heavy concentrations across integrated industries (such as precision instruments, chemicals, and public admin.). In other words, were these two main sub-sectors to close this would have a major impact on other sectors within the local economy.
- 14.4 Aerospace industries are estimated to contribute around one-third to total manufacturing GVA in Lancashire. Aerospace is Lancashire's flagship industry and with GVA per head more than 1½ times the UK industry average it brings considerable wealth to parts of the county. But in doing so it also contributes to a somewhat distorted picture of prosperity levels and of the strength of the manufacturing sector more generally.

In the context of Fylde Borough, the economic analysis contained in this report concludes that the outlook for aerospace is positive, posting a forecast increase in employment to 2015.

- 14.5 The consultation carried out with British Aerospace (BAe) has demonstrated that activity at Warton is intrinsically linked to contract assignments. With wider changes in the defence industry pushing towards un-manned flight, the current role of Warton as a production facility of aerospace technology is brought into question. BAe is

currently negotiating a contract to build the Eurofighter from its facility at Warton. Once secured this contract will secure the immediate future of the facility with production lifespans running to 10 years. However there remains a risk associated with the aerospace industry in Fylde and in Lancashire more generally.

Consultation with BAe has also highlighted that following the Eurofighter contract which is likely to span 10 years in production, the company has plans for the consolidation of its sites across Lancashire and Greater Manchester. It is likely that the Warton site will go through a period of decommissioning after that time and this will be a material consideration in planning for a sustainable supply of employment land in the next plan period.

In order to limit exposure to employment losses in aerospace, the Council should look to actively engage BAe in regular dialogue as well as examining the potential to link into the planned aerospace park being jointly considered by the NWDA and industry representatives at Salmesbury (located in Ribble Valley/ South Ribble).

#### **Point 5: Future Demand for Employment Land to 2016**

14.6 Three employment land demand scenarios were generated for the purposes of this study. It was noted that each scenario has specific strengths and weaknesses associated with it and the relative merits of each scenario informs their applicability to the local situation. To recapitulate, the scenarios comprised:

- Scenario 1 – using past trends in employment land take-up to establish a possible trajectory for demand
- Scenario 2 - taking the LEFM employment forecast as its starting point and projecting land requirements on a sectoral basis
- Scenario 3 – starting with the LEFM forecast and modifying this to isolate growth in the aerospace sector from the requirements for employment land.

The land requirements generated under Scenario 1 were based on historic supply and demand conditions. For this reason it is not considered a reliable basis onto which to plan for supply of employment land in the future. The changing structure of the economy as profiled in the econometric forecast heightens the need for a more robust evidence base upon which to assess potential demand and prospective occupier requirements.

Scenario 2 is considered to be the preferred scenario in the estimation of demand as it is based upon the current economic prognosis for the borough rather than a set of historic supply and demand relationships. Under this scenario, high and low range requirements have been calculated as 27.7ha and 18.7 ha respectively. These requirements are not dissimilar to those generated under Scenario 1. However, the range of 18.7-27.7 is considered too wide to plan effectively for an appropriate supply of employment land. The breadth of the range is intrinsically linked to the assumptions made in relation to plot ratios (or development density).

Taking into account the nature and location of the borough's employment land supply, the higher estimate of employment land demand under Scenario 2 (27.7 ha) is considered to be most appropriate in the context of Fylde Borough. It is recommended that the Council makes provision to accommodate demand in the order of 28ha employment land in line with Scenario 2.

Scenario 3 is considered to be useful in illustrating the continuing importance of aerospace to the Borough. However, consultation with BAe has served to provide a reasonable level of confidence with regard to the security of the Warton site over the forthcoming plan period. Therefore, Scenario 3 is not considered to be the most appropriate scenario upon which to plan for a sufficient supply of employment land. The Council will however wish to maintain an ongoing dialogue with BAe in order to track and effectively plan for their evolving employment land requirements.

#### **Point 6: Supply of Business and Industrial Land**

This study uses published and bespoke economic intelligence in order to estimate the broad quantum of land that is required in the period to 2015. It is estimated that some 28 hectares of employment land will be required in the period 2005-2015 in order to successfully retain and attract investment and employment at the levels forecast. This is an estimate at a specific point in time, and the Council will need to continue monitoring take-up of employment land under a plan, monitor and manage approach to provision.

The ability of the borough's current supply of employment sites to absorb this level and type of demand has been assessed along with a range of site sustainability criteria. At a headline level there appears to be a sufficient quantum of employment land to absorb demand however the supply of sites is constrained and there is no margin for expansion in demand over and above that forecast.

The effects of losses to employment land have been assessed on the overall economic performance of the borough. It is concluded that while this cannot be claimed to have directly constrained previous rounds of investment or employment growth, it has undoubtedly contributed to the current “tight” supply position.

In the event of further losses to employment land, it is estimated that the borough’s ability to retain existing businesses and to attract new firms to the area will be significantly diminished.

A qualitative assessment of the available supply suggests the stock of sites and premises lacks commercial appeal to the target growth sectors and exhibits a range of environmental disincentives to investment. The existing supply of sites has been assessed as largely comprising “general industrial sites”, many of which are poorly located in relation to sustainable transport networks and which suffer from low grade and poorly maintained environments. This supply is unlikely to appeal to the type of occupiers that will generate employment in the emerging sectors of computer services, business and professional services. Further the scope for redevelopment of these sites is constrained by their classification as suitable for general industrial, distribution and warehouse uses. It is concluded that there is a qualitative mismatch between supply of employment sites and anticipated sectoral demand relating to office based businesses.

#### *The impact of employment land loss on local economy*

Business and industrial land lost over recent years has not coincided with an observed change in the economic trajectory or performance of the borough. While there have been net employment losses experienced, these can principally be attributed to the structural exposure of the borough to employment in aerospace – which has experienced a downsizing trend in its workforce.

Isolating the effects of aerospace, the economy would have posted a growth in jobs in the order of 2,000 in the same period that employment land was lost to alternative uses. In conclusion, there is no conclusive evidence to suggest that losses of the scale experienced to date have placed a constraint on economic development of the borough. This does not, however, preclude potentially damaging effects of further loss of employment land in meeting anticipated levels of business demand in the period to 2015.

#### *The impacts of loss of employment land at Dock Road/ Preston Road*

There is a direct correlation between land lost at the site of the former Cooksons Bakery and a linked decline in the manufacture of food and beverages sector in overall employment terms. It should however be noted that the closure of Cooksons related to a corporate downsizing strategy, rather than being directly related to the availability or quality of employment land in the borough to sustain its activities.

Projecting forward, if further losses were to be experienced at Dock Road this would potentially place employment at the existing 3 firms at risk. Employment currently totals 260 employees in a range of occupations. The firms located on Dock Road can be considered “dynamic” and are involved in “knowledge based”, higher value-added manufacturing. Two of the three firms are investing heavily in their premises and plant and machinery. They have growth plans in terms of the size of their businesses and the workforce required to operate a larger volume of contracts. It is likely that their respective workforces will continue to grow over the plan period.

There is a potential opportunity cost of future jobs foregone if the land at Dock Road is lost to business and industrial use, and the potential displacement of these businesses investment to sites outside the borough. Under this scenario the 260 existing jobs would also be placed at risk from displacement to a location outside the borough resulting in a net loss in local employment.

#### *The need for a compensatory allocation*

Discussions with the Dock Road Action Group, which represents affected businesses, and an analysis of business requirements suggests that there is a need to retain Dock Road in its current use. Key to achieving this aim will be strengthening the provisions of policy EMP2 in line with the recommendations contained in this report.

Businesses have invested heavily to improve and develop their premises and in the installation of specialised plant and machinery. Businesses remain committed to the Dock Road site and cite difficulties in finding suitable alternative accommodation at a competitive price within the borough. If land at Dock Road were to be lost to an alternative use, it would be important to work with the affected businesses and to examine potential opportunities for relocation. However, the supply of sites in the borough has been assessed as tight and, in the absence of a windfall site coming forward, it might be necessary to consider a compensatory allocation.



Under this scenario the Council should work to establish the requirements of each of the occupiers relocating as well as considering the potential to enhance the supply of quality business accommodation for general economic development purposes through the compensatory allocation.

### **Point 7: Appraisal of Policy EMP2**

It is apparent that policy EMP2 in its current form:

- Is designed to protect land and premises in their current use class, based on past trends of industrial activity and land use;
- It offers limited flexibility to accommodate the requirements of emerging office based sectors and may limit the supply of suitable land for office development in the future; and
- It leaves the borough open to further employment land loss in the future by virtue of a lack of requirements to demonstrate a compelling “commercial” case for the redevelopment of employment land to non-employment use;

The supply and demand analysis contained in this report serves to illustrate a quantitative and qualitative mismatch in the current supply of employment land and that which will be demanded by growing business sectors. It also demonstrates that the supply of sites is “delicately balanced” with forecast demand and further losses of land may prejudice the borough’s ability to realise its economic growth potential.

It is recommended that a criteria based approach to assessing the loss of employment land to alternative uses is adopted. The onus should be upon applicants in demonstrating a compelling case for a site to be considered for alternative uses, making a full account of all reasonable steps that have been taken to retain and develop a site for employment uses. The approach of market testing is increasingly becoming recognised as an effective method for assessing the market viability of sites and would considerably enhance the existing policy provision.

#### *Recommendations:*

- Policy EMP2 is revised to incorporate a greater degree of flexibility in the acceptability of office based uses in previously industrial, storage and distribution

areas. This will help to build in flexibility in supply and facilitate economic growth in the office based sectors as forecast;

- Policy EMP2 is revised to require applicants proposing a change of use to demonstrate that all reasonable attempts have been made to market and dispose of the site on the open market. Evidence should be submitted to demonstrate that the site has been marketed for a reasonable period of time (say 18 months to 2 years) at a competitive market price which does not embody “hope value” associated with the proposed change of use. In reworking the policy, the Council has the possibility of stipulating the media/ publications in which sites are marketed and evidence of such marketing.
- That under a revised policy EMP2 applicants should be required to prepare and submit site development appraisals demonstrating that redevelopment for employment use is financially unviable. The role of the public sector (the Council and its partners) should then be considered in terms of its ability to remove barriers which constrain the site from being developed on a commercially viable basis.

### **Point 8: Appraisal of the New Residential Development SPG**

The SPG has only been in operation for a relatively short time since September 2004 and the pipeline of residential development will serve to insulate the economy from major labour force shortfalls in the short to medium term. However there is evidence that the borough is currently reliant on imported labour to fill employment opportunities. This labour is drawn from the wider Fylde Coast economy and Preston. Consultation with major employers has denoted the active recruitment of employees from Eastern Europe as a response to deficiencies in the supply of local labour to fill low income and seasonal employment.

- 14.7 The operation of the SPG as assessed will potentially have mixed impacts on the economy. It is considered that the restrictions placed on market housing for sale will not directly impact upon employment creation or otherwise displace investment outside the borough. Rather it will intensify labour force links with other areas in the Central Lancashire City Region.

The SPG is unlikely to constrain business investment as a significant proportion of the forecast investment and job creation will be made by firms that are already

established and occupying sites and premises within the borough. These companies will potentially draw labour from a further afield within the Central Lancashire City Region. Their investment is only likely to be displaced outside the borough if the supply of sites and premises does not offer them the space or quality of business environment required to grow their activities profitably and sustainably.

Acting to restrain new market residential development and thus the growth of the workforce, it will increasingly place reliance on a commuting workforce to fill job opportunities forecast to be created in the period to 2015.

This is likely to lead to an increase in car borne traffic on the borough's roads in addition to prospective household spending power and Council Tax revenue leaking out of the borough. These factors should be monitored closely over the plan period as they constitute a significant opportunity cost to economic development, environmental sustainability and local prosperity.

The SPG is designed to enhance the supply of affordable housing – the supply of which has been identified as one barrier to attracting local labour to fill low-income occupations. It therefore has the potential to enable lower skilled and low income employees to be drawn from the local area as the provision of affordable housing is enhanced. The scale of its achievement in this respect demands careful monitoring over the plan period.

### **Point 9: Appraisal of the Highway Network**

A review of existing traffic flows has been completed which allows the theoretical link capacity and therefore potential reserve capacity to be calculated. It is envisaged that this analysis will assist the Council in assessing any subsequent planning applications.

To determine existing traffic flows the latest Automatic Traffic Count (ATC) data from Lancashire County Council has been assessed in relation to the major routes in the borough. The ATC results indicate that of the 24 locations assessed, none of the observed traffic flows exceeded the theoretical link capacity during the AM or PM peak periods. In summary we believe that the local highway network is not a significant constraint to the development of the local economy based on theoretical capacity built into the highway network.

An analysis has also been undertaken as part of this study to establish site specific accessibility factors relating to employment sites. The results are summarised below:

- To summarise the baseline conditions, it is considered that the existing transport infrastructure in Fylde operates satisfactorily. In addition, there are a number of transport improvements and employment opportunities being considered that could encourage a modal shift away from the car on to public transport or bicycle.
- The accessibility appraisal results presented in Table 3 highlights that of all 29 sites reviewed only two are awarded the rating of highly accessible. One of the sites is currently used as offices by Aegon and is located in Lytham town centre. The other site considered to have excellent access is the Combined Town Hall and Public Offices, located on Clifton Drive South.
- A further 21 sites were awarded a medium accessibility rating. The majority of these were accessible by combinations of bus, rail or bicycle. However, it should be noted that the accessibility rating is based on sustainability and does not take the highway network into consideration. Some of these sites have excellent links to the surrounding road network.
- The remaining 6 sites were primarily accessible by car with no form of sustainable transport available for access. Therefore they have been awarded the rating of low accessibility.

#### **Point 10: The effects of proposed expansion at Blackpool Airport**

Further employment opportunities exist in relation to the development of Blackpool Airport which is pursuing an aggressive expansion strategy in terms of its route destination offer. With passenger numbers set to reach the half million mark this year the potential for employment gains is profiled in this report. We estimate that there is potential for up to 1,200 jobs to be created directly and indirectly as a result of the airport expansion. The following direct and indirect benefits can reasonably be expected to flow from investment in the airport and expansion of passenger numbers:

- Direct growth in a diverse range of occupations associated with operation and maintenance of the airport;
- Potential indirect labour market and business benefits caused by an aggressive expansion programme at the airport;

- The airport is considered to be of strategic importance to the regeneration of Blackpool and the planned resort casino. The airport's development is also assessed as being of sub-regional significance in the context of Lancashire's economic development.

### **Point 11: The Condition of the Rural Economy**

The condition and competitiveness of the rural economy has been assessed in relation to its labour force and employment trends in addition to the specific contribution of the agriculture sector. Conclusions relating to each of these factors is provided below:

#### *Labour Market / Employment*

The rural economy in Fylde is characterised by a robust set of labour market characteristics, with specific challenges being those faced by the agriculture sector generally at the regional and national level. The rural economy in Fylde is identified as being strong, relative to the urban economy. Specifically it is characterised by:

- comparatively strong labour market indicators in terms of economic activity, unemployment levels
- a disproportionately positive role in terms of employment (apparent and underlying), with advantages for the two key sectors, but resulting economic exposure
- a business mix reflecting the traditional role of the rural economy, but also integrating integration with wider urban activity, and growing opportunities for services which exploit new ITC.

#### *Agriculture sector*

A declining VAT base suggests that there is downsizing within the sector, driven by potentially lower earnings potential. The sector is also threatened at the national level by a challenging market and fiscal framework, in addition to the recent crises within the sector including BSE and Foot and Mouth.

Fylde, unlike many other parts of Lancashire, has a relatively smaller concentration of the agricultural sector contributing to its economy. It does however supports around 6% of total employment (i.e. 2,500 jobs), just under 3% of which is directly

attributable to the sector, comprising mainly rural jobs. Therefore, the importance of this sector to the rural communities in Fylde is significantly high – contributing as much as 50%<sup>60</sup> to total underlying rural jobs.

The future trends in the sector are found to be mixed – with growing pressure on productivity resulting in a declining number of jobs, but strong GVA growth. Maintaining employment levels in the rural economy is critical, with the predicted losses suggesting wider issues for the agriculture sector generally, but also specifically for the rural communities within Fylde it supports.

In summary, where the rural economy remains highly dependent on the agricultural sector there is an anticipated period of economic decline. An emphasis on developing new businesses and opportunities appropriate for rural development should be a key economic priority within Fylde in the future.

This does not necessarily mean creating more jobs in the wider context of Fylde – the economy within the borough benefits from strong ‘anchor’ industries, and future growth sectors. Significantly however, this employment creation within the borough may fall outside of the designated rural area economy. There should be emphasis placed on access to employment opportunities created in Fylde – to ensure the rural population can benefit from the growth sectors proportionately.

The analysis suggests that links between the rural and urban economies in Fylde is well established. Further to this, rural Fylde's contribution to economic activity is disproportionate – being almost equal to the urban economy. This highlights the important role of the rural economy to future economic prospects in Fylde and the location of major employers such as aerospace and nuclear fuels in rural areas.

### **Point 12: The Condition of the Tourism Economy including the Regeneration of Blackpool**

The tourism sector provides a particular area of opportunity for Fylde borough and one upon which it can distinguish itself through the quality of its visitor offer. Currently the value of this sector is some £116.5 million annually. This report contains reference to specific market opportunities which could be exploited in order to generate higher levels of visitor trips, overnights stays and associated expenditure in the economy. The employment forecast projects employment creation across

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<sup>60</sup> With BAe and BNFL excluded total rural employment drops to around 5,000 jobs, implying a very significant underlying role by the agricultural sector

business sectors associated with tourism and the visitor market, attesting the growing contribution that this sector will make to the economy. This is a welcome trend and one which will help the borough to reduce its economic exposure to employment in the aerospace and nuclear fuels sectors.

The regeneration of Blackpool has the potential to lever major additional benefits for Fylde borough. The ambitious resort masterplan contains visionary proposals for a regional casino, conferencing facilities and hotel development among other uses. While it is an early stage in the implementation of the masterplan, the economic benefits for Fylde borough have been assessed.

In headline terms the regeneration proposals have the potential to generate an additional 1,890 FTE jobs within the Fylde economy. These jobs are contingent upon full delivery of the resort casino proposals. These jobs can be considered as additional to those forecast in the LEFM model. The regeneration proposals have the potential to contribute an additional £58m of annual visitor expenditure to the Fylde borough economy;

These are benefits which are likely to be delivered over a long timescale spanning 15 to 20 years and, as previously noted, contingent on the full scale proposals being realised. While linked visitor trips and expenditure could be developed through association with Blackpool, the challenge for Fylde borough is in protecting and developing its own unique identity and character to complement Blackpool's regeneration plans.

Taken together these are clearly major economic impacts for the borough, however as detailed elsewhere in this report labour force constraints within the borough and the capacity of Fylde's visitor infrastructure might serve to restrict the overall portion of growth that can be captured and the benefits flowing to the indigenous workforce.

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