Fylde Local Plan

STATEMENT OF REGULATION 20 CONSULTATION

In accordance with Regulation 22(1)(c)(v)

of The Town and Country Planning (Local Planning) (England) Regulations 2012

November 2016

Contents

Appendices

1. Introduction

1.1 This document has been produced to provide a report and summary of the representations made in response to the Fylde Local Plan Publication Version consultation. The report accompanies Fylde Local Plan Publication Version, along with all the other submission documents, at the submission of the plan to the Secretary of State for Examination in Public.

1.2 This document has been produced in accordance with, and to fulfil the requirements of, Regulation 22(1)(c)(v) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The requirements are that, if representations were made pursuant to Regulation 20 (which they have), the prescribed documents that must be sent to the Secretary of State includes a statement setting out the number of representations made and a summary of the main issues raised in those recommendations. Separate documents are provided to fulfil the requirements of Regulation 22(1)(c)(i) to (iv) (the Statement of Regulation 18 Consultation) and of Regulation 22(1)(d) (the Copies of Regulation 20 Representations).

1.3 The consultation on the Fylde Publication Version Local Plan was undertaken from 11th August 2016 to 22nd September 2016 inclusive. Letters were sent to everyone on the Planning Policy consultation database, a list of more than 1100 organisations and individuals. A formal public notice was placed in The Lytham St. Annes Express, and a press release was issued resulting in the publication of a news article in the Blackpool Gazette. The documents were made available in paper form at the council's One Stop Shop and at libraries within the borough; they were also published on the council's website

1.4 The previous rounds of consultation are set out in the Statement of Regulation 18 Consultation which describes details of each round of consultation, starting with the Vision, Issues and Objectives which includes the original letter under Regulation 25 of the 2004 Regulations, which fulfils the requirements under the Regulation 18 of the 2012 (current) Regulations. The Statement of Regulation 18 Consultation, also included in the submission documents along with this document, fulfils the requirements of Regulation 22(1)(c)(i) to (iv) of the 2012 Regulations.

1.5 The results of the consultation are set out in the following sections. The complete representations are provided in the separate Copies of Regulation 20 Representations document.

2. Representations: summary data

2.1 The total number of representations received pursuant to Regulation 20 was **71**.

2.2 The representations were from: 15 councils, statutory bodies and parish/town councils, 39 agents/landowners/developers, 10 other groups and 7 individuals.

3. Summary by policy with council response

Summary of Representations Received on the Fylde Publication Version Local Plan

Consultation between 11th August and 22nd September 2016

Representations ordered by Policy as set out in the Local Plan document

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
General comments on whole document							
National Trust		Yes	Yes	Yes	No comments to add to those submitted previously.	None specified	Comment noted. NT's earlier suggested change was incorporated into the Publication Version.
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Requested that the two Minority Reports prepared by councillors not part of the administration are provided for the inspector.	None specified	Cllr Oades was contacted and subsequently submitted these reports as a submission to the Publication Plan: the issues are dealt with in the relevant sections of the plan.
National Grid		Yes	Yes	Yes	"National Grid has no comments to make in response to this consultation."	None specified	Comment noted
Canal and River Trust		Yes	Yes	Yes	"We have no comments to make on the soundness or legal compliance of the document."	None specified	Comment noted
United Utilities		Yes	Yes	Yes	UU has previously met with Fylde Policy Officers and commented on individual sites; as no further sites have been added, do not provide any additional comments on the sites.	None specified	Comment noted
Story Homes Ltd.	Barton Willmore	No	No	No	Concerns regarding overall soundness of the plan; especially: approach to the OAN departs from national policy, the housing requirement is insufficient, assumptions on delivery are unrealistic, site allocations required in Elswick given uncertainty of neighbourhood plan. Supports allocation of Willow Drive, Wrea Green.	Revisions to supporting evidence. Housing requirement to support the level of job growth (440-450 dpa) Allocation of additional sites Allocation of sites in Elswick	The detailed points raised in the full submission are dealt with under the individual policies
Environment Agency		Not specified	Not specified	Not specified	"…we wish to comment as follows:- We are pleased to see that our comments in our previous response … to the Revised Preferred Option consultation have been taken on board."	None specified	Comment welcomed

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Gladman Developments		Not specified	Not specified	No	The Council should satisfy itself that the plan is sound before submitting to the Secretary of State. Significant objections to the plan, requests appearance at Examination.	There remains an opportunity to correct fundamental weaknesses by the production of an addendum, which would then be subject to a 6-week consultation period before submission with the plan.	The Council considers the plan to be sound. It is not the intention of the Council to produce an addendum to be subject of further consultation. The detailed objections are dealt with under the individual policies.
Hallam Land Management	Pegasus Group	Not specified	No	No	The representation should be read alongside those submitted for RPO and Clifton House Farm Public Inquiry. Interest in Clifton House Farm, Warton and Blackfield End Farm Warton, latter is approved in outline, former awaiting decision from Secretary of State The council failed to produce an AMR for two years: AMRs are key component for monitoring throughout the plan period.	The performance monitoring framework should be supported by a specific policy requiring the AMR to report on all indicators annually	Details of the representation are considered under relevant policies The AMR will report on the indicators, and be produced annually: there is no need for a policy. No change
National Farmers Union		Not specified	Not specified	Not specified	Stress the importance of the alignment of plans, strategies and projects dealing with climate change, adaptation and flood risk management, to ensure that work by farmers along the catchment to protect communities from flooding is not compromised or undermined by planning policies and poorly sited urban developments	None specified	The NFU do not appear to have alleged that the Fylde Publication Version Local Plan has the effect of compromising or undermining work to alleviate flood risk; these just appear to be general comments. The danger is recognised; however the Council has engaged with responsible bodies to ensure that the development strategy is compatible with catchment management plans.

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Chapter 1: Introduction							
Story Homes Ltd.	Barton Willmore	No	No	No	Provided that the plan is adopted in 2017, the Plan would still have the required	None specified	Support welcomed

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					timescale of 15 years: therefore, the Plan period is supported.		
CAPOW		No	No	No	Neighbourhood Plans have been required to follow each draft of the Local Plan; all submitted draft Neighbourhood Plans have been ignored in the determination of applications; those who have gone through the routine feel ignored and their time wasted. Approvals in the interim have resulted in the need to significantly amend draft neighbourhood plans, and render them out-of-date, but not through policy amendments.	None specified	This comment has been about the process set out in legislation and guidance. The Council has provided considerable assistance to bodies seeking to bring forward Neighbourhood Development Plans. The advice of the Council has not always been followed.
Historic England		Not specified	Not specified	Not specified	Draw attention to the requirement for SEA on NDPs being triggered by potential for significant effects on the historic environment.	None specified	Although the Plan text discusses NDPs, statutory requirements relating to them are outside the direct scope of the Plan; however, the Council has advised of the need for screening for likely significant effects where necessary.
The Duty to Co-operate							
Home Builders' Federation		Not specified	No	Not specified	Pleased to note meetings and joint work under DtC, Memorandum of Understanding and agreement to accommodate 14ha of employment land to meet Blackpool's requirements: encouraging, and was referenced by Inspector to Blackpool Core Strategy. Council's response to Wyre request that Fylde assists meeting OAN, making no firm commitment to assist, raises serious concerns. The HMA includes Blackpool (with tightly constrained boundary) Wyre and Fylde: to ensure full needs of wider HMA are met will need Fylde to play key role. Plan currently lacks flexibility to deal	The plan should identify the quantum of assistance the council is willing or able to provide; ideally the plan should identify the location of such development: unmet needs of Wyre could be accommodated in reasonable	Support welcomed It would be premature to attempt to meet a shortfall in OAN that is unknown, and to locate such development without an understanding of the proposed development strategy of the neighbouring authority

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					with issue of unmet needs from neighbouring authorities. Statement of Compliance and plan do not fully address housing implications of LEP ambition to create 50,000 new jobs 2015-2025	proximity to the administrative boundary	Relevant section of plan is chapter 10. Unclear how HBF imply that DtC is affected.
Wyre Council		Not specified	No	No	Take issue with para 3.36 of Statement of Compliance that Fylde Council is not aware of any objections to the overall soundness of the emerging Local Plan, and that no concerns expressed by Wyre regarding level of co-operation undertaken by Fylde. Fylde has failed to properly consider whether unmet housing needs arising in Wyre can be met in Fylde; Fylde has not positively engaged with Wyre on this issue Memorandum of Understanding states "we will work together to … reach a consensus on housing provision across the Fylde Coast sub-region" but goal has not been reached. Difficulty for Wyre to meet OAN first mentioned 8th May 2015 (though need for assistance was not indicated), again on 3rd July 2015; on 22nd September 2015 Wyre indicated that formal request for assistance would be made in writing; letter formally requesting assistance to meet Wyre's portion of Fylde Coast OAN was sent 4th May 2016; after response from Fylde follow up letter sent on 24th May 2016. No further response from Fylde. Paragraphs 3.24 – 3.26 of Statement of Compliance with DtC states that amount of additional need is unknown, and therefore		Wyre's response to the Revised Preferred Option consultation dated 30th November 2015 states: "Wyre Borough Council has considered the Revised Preferred Option and is, in general, supportive of the emerging Fylde Local Plan … Development at Elswick is likely to have an impact on the A585. Development in Wyre is constrained by the capacity of the highways network, most significantly the A585. Wyre Borough Council seeks assurance that development in Elswick will not further constrain development in Wyre." The RPO had a similar overall housing requirement as the Publication Version. Therefore, Wyre's position has changed from one of support for the Plan, to one of objection, from concern to restrict development near the boundary to a request for an unspecified quantum of development.

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					need to avoid delay to the plan, but this shows that Fylde has not engaged proactively with Wyre on issue where there is joint responsibility: meeting housing need across the Fylde Coast HMA 4th May letter stated that Wyre would be likely to only be able to accommodate two thirds of its requirement of 9580 dwellings. Although exact unmet need not known, Fylde is aware of broad scale of unmet need. Fylde's letter in response to the request for assistance (18th May 2016) mentions holding objection from Highways England, but Fylde still producing supporting evidence, yet not published with the plan. Assumed that Highways England objection now removed. Fylde's letter also raised issue of commuting between boroughs if need for Wyre was accommodated in Fylde, but this should not be a restrictive constraint as greatest net commuting at present from Wyre is to Fylde: most of both boroughs are in same Housing and Economic Market Area, implies an accepted level of cross-boundary movement. If a balanced commuting rate to be targeted, a greater amount of housing would be needed in Fylde (but Wyre do not advocate this). Fylde's letter also noted that any further sites would need assessment and mitigation for effects on wintering	Policies in the Fylde Local Plan should have been flexible to respond to anticipated needs over the plan period. Would expect evidence to include consideration of mitigation measures to support further development, including accommodating additional housing need arising in Wyre. Alternative growth options should be considered and	To provide for one third of Wyre's stated OAN would amount to an uplift of Fylde's housing requirement of 41%. To devise a strategy based on a need that is unknown but might be a 41% uplift would require not flexibility, rather it would require an entirely new strategy. Without significantly more information, development of a replacement strategy cannot be justified based on an unknown requirement This remark confirms that the constraint of the highway is the same whether the development to meet Wyre's stated need were located within Fylde or Wyre itself, as stated in the 18th May letter to Wyre. The need for housing within Wyre arises from Wyre; therefore, the location of housing in Fylde would tend to exacerbate unbalanced commuting patterns, resulting in pressure on roads including the A585. Unless and until the extent of any unmet need is clear, it would not be

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					wildfowl, and the potential impact of the scale of the development; but NE just required more information in the HRA to conclude "no likely significant effects". Fylde's letter also notes that if any additional land were made available, the question would be whether it should be used to achieve a higher OAN rather than address Wyre's unmet need: implies that housing requirement is below what should be the actual OAN. Fylde's letter also queries whether Wyre's OAN should be at the top end of its range, but the NPPF and Hunston Court of Appeal Decision confirms need to use full OAN without imposition of constraints. Lack of further communication after letter from Wyre to Fylde of 24th May and the Joint Officers and Members MoU meeting of 22nd June. This leads to conclusion that insufficient consideration has been given to meeting housing need within joint HMA. Implied approach of Fylde to wait until other authorities have responded to request will not work: each authority needs to consider how they can assist individually before there is a joint discussion; Fylde and Blackpool have joint responsibilities in meeting the need within the joint HMA Regarding SA of alternative options: no planning reason for theoretical upper limit to growth in each settlement; no review of impact from different growth scenarios	screened. Only at the stage of mitigation and compensation in the Appropriate Assessment should sites be discounted as functionally linked land	justified to embark on a screening exercise for additional sites The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. Wyre's unmet need remains unknown. The approach has been not to commit to meet an unmet need that remains unstated. The Settlement Hierarchy Background Paper provides an assessment of the scale of growth that is appropriate for each settlement, following the principles of sustainable development.

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							Alternative strategic options for growth in the borough were considered earlier in the plan-making process, at Issues and Options stage, and this was subject to SA.
					The SA has not considered how rejected sites could be made more sustainable and therefore achieve scores as high as those included in the plan.		The plan has identified sufficient sites to meet the OAN. Lower scoring sites were therefore rejected as not representing sustainable development.
					Queries where SA states no landowner or developer interest: have landowners been contacted directly? Was the call for sites exercise limited to those who responded or, if insufficient developable sites were submitted, land was identified and landowners directly contacted		Sufficient developable sites were submitted
					Local Plan "abdicates responsibility" to Neighbourhood Planning to allocate sites within Elswick: no certainty that sites will be delivered.	Provide fall-back position within the Local Plan.	The Neighbourhood Planning process is a valid and appropriate way for sites to be allocated, in accordance with the Framework.
					Sites discounted at Little Singleton because it is located in countryside	Define Little Singleton as a settlement and include discounted sites within settlement boundary	"Little Singleton" does not have the characteristics of an individual settlement: the term is sometimes used to refer to a series of discontinuous ribbons of development within the countryside. The designation as countryside is appropriate
					Existence of alternative sites that could be allocated implies that Fylde could assist Wyre meeting housing need within joint HMA.	Allocate reserve sites in order of priority to be released in support of Wyre Local Plan.	Alternatives considered through SA process are not sustainable development, which is why they were not included.
					No engagement with Wyre about inclusion of Wyre CIL funds as funding source for highways improvements on M55 and A585	Delete reference to Wyre CIL	It remains unclear what work in Fylde will be required to support Wyre's plan. Fylde Council is committed to further engagement in support of

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					IDP does not consider of cumulative impact of allocation of 50 in Elswick and 25 in Little Eccleston on Great Eccleston Health Centre IDP does not indicate whether the impact on schools is considered due to development in Elswick and Little Eccleston. Copp Primary School has insufficient capacity for growth in both Great Eccleston and Elswick/Little Eccleston. Fylde did not positively engage on strategic matters and cross boundary infrastructure matters before publishing the plan; insufficient evidence provided to Wyre; Fylde has rushed to publish without sufficient evidence in place. Fylde has not given due consideration to the housing needs within the joint HMA. Response to Wyre's deficiency has been to do nothing until exact number known and other authorities have indicated amount of assistance.	If Great Eccleston Health Centre needs expansion then needs to be stated in IDP in order to ensure contributions are sought from developments in Elswick and Little Eccleston. Should have made provision for anticipated shortfall by allocating reserve sites.	infrastructure delivery to support Wyre's plan. Not raised as an issue by PCT Impact on schools arising from development across the borough is considered in the IDP. LCC, in their response to the plan, have not raised concerns over the provision of places due to development in Elswick/Lt Eccleston A version of the Infrastructure Delivery Plan was provided as part of the Revised Preferred Option Consultation.
Blackpool Council		Yes	Yes	Not specified	Fylde Council has engaged with Blackpool Council on an ongoing basis as part of DtC; Fylde Coast Authorities (Blackpool, Fylde and Wyre) and Lancashire County Council hold regular DtC meetings to discuss strategic issues and a formal Memorandum of Understanding has been agreed;	None specified	Acknowledgement of the level and extent of co-operation welcomed, in particular the provision of employment land for Blackpool's unmet need.

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					Blackpool and Fylde have worked together on evidence documents; and on strategic employment matters and accommodation of unmet Blackpool employment need.		
Strategic Land Group	Turley Associates	No	No	No	Wyre made a written request in May 2016 that Fylde assists it in meeting its OAN; its ability to meet its OAN is constrained; Fylde's response is that extent of the unmet need is unknown as is ability of neighbouring authorities to accommodate it; but Blackpool has tightly constrained boundary, therefore only Fylde within the HMA has potential to assist. Comment in Statement of Compliance that 'Fylde is not able to accommodate any unmet needs of neighbouring authorities if such a request is made' conflicts with the principles of the DtC and contradicts Fylde's claims around future cooperation; no evidence provided as the basis on which Fylde cannot accommodate an amount of Wyre's requirement Framework requires co-operation should be continuous process from initial thinking to implementation, resulting in a final position where plans are in place: agree that initial thinking completed (joint evidence), but gap in implementation evidenced by Wyre's request not being addressed: contrary to Framework.	None specified	The extent of unmet need remains unknown. Additional sites in locations that would help to meet Wyre's need would not be sustainable and would face the same highways constraints as development within Wyre itself. Co-operation will continue with all relevant parties. Fylde Council will continue to assist Wyre with the delivery of its plan.
Environment Agency		Not specified	Not specified	Not specified	Satisfied that EA involvement has been properly recorded.	None specified	Comment noted
Gladman Developments		No	No	No	Issue of co-operation is not something that can be rectified by modification; failure to discharge DtC means inspector must recommend non-adoption		Comments noted, the Council has complied with DtC.

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					The Statement of Compliance states that Fylde is unable to assist neighbouring partners in HMA in meeting unmet needs, but contrary to statement in para.3.26 that Council is committed to working with Wyre and its other neighbours. Notes Warwick Local Plan: where significant shortfall, having identified OAN for the HMA, inspector saw no basis for failure to meet it in full.	 Update housing needs evidence base and "address the distribution of these issues"	Fylde Council remains committed to working with partners including Wyre. Extent of any unmet need remains unclear; it would not be possible to produce an altered strategy on the basis of current information.
Hallam Land Management	Pegasus Group	Not specified	No	No	Welcomes Memorandum of Understanding between Blackpool, Fylde and Wyre. Fylde's agreement to accommodate 14 Ha of employment land to meet Blackpool's requirements "is evidence that the plan has been positively prepared in respect of employment land" Blackpool is physically constrained and has a history of under-delivery; therefore Fylde may need to be prepared to accommodate some of Blackpool's future need Wyre made a request in May 2016 for Fylde's assistance in meeting their OAN, but yet to confirm precise extent of unmet need. Fylde acknowledge that this is important, but note that cannot afford to delay plan, propose to address this at a later stage through joint working once evidence completed. Have serious concerns with this approach: Fylde will have to accommodate unmet need from wider HMA, which will have a major bearing on the housing strategy in the plan, and therefore the plan has not been positively prepared	 Incorporate Wyre's unmet need into the submitted plan, either by adopting a working estimate or by waiting for the precise level of need to be confirmed (evidence work to be available January 2017). Otherwise, at the very least, provide a detailed statement of co-operation on this matter with a clear timetable and mechanism for early review of the plan.	Comment welcomed Comment welcomed No request has been made by Blackpool to assist with the providing for unmet housing land need Delay to the Publication or Submission of the plan could not be justified by Wyre's request, but Fylde Council will continue to work with Wyre towards delivery of its plan, in line with the Memorandum of Understanding.

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					Notes West Oxfordshire Inspector's report which asserts that if a plan were to proceed to adoption without having regard to apportionment of unmet need, it would be immediately out-of-date.	Include provision for Wyre's unmet need within plan now, if apportionment of it will be confirmed before adoption	There is a lack of information and evidence at this stage as to what the unmet need will be. Co-operation will continue, and the position considered as further evidence is brought forward.
Carrington Group	Johnson Mowat	Not specified	Not specified	Not specified	Wyre Council has requested assistance from Fylde in meeting its OAN; the council's response is less than encouraging: continue to discuss but no firm commitment to assist meeting housing needs of neighbouring authority. Serious concerns over approach.	Consultee's land holdings adjacent to border between boroughs could be included within plan to assist meeting Wyre's OAN	Extent of unmet need is unknown. Fylde is committed to continuing to work with Wyre and other neighbours in order to address the issue. The particular site is considered in responses to Chapter 7
Taylor Wimpey	Cushman and Wakefield	No	No	No	Wyre Council has written to Fylde requesting assistance in meeting Wyre's OAN; Fylde response that evidence base is incomplete and extent of unmet need is unknown, also that unknown how other neighbouring authorities can assist; but Fylde will committed to work with Wyre and other neighbours. However, no additional provision has been included in the OAN or the housing requirement figure: this is concerning given Blackpool's tight boundary, therefore Fylde must play key role to ensure full needs of HMA are met. Recognised that Wyre at a relatively early stage of Local Plan production and as such clarity over the exact nature of unmet need remains uncertain, however, it is anticipated that Wyre will be in a position to provide more detailed information in early 2017. This is likely to be prior to the examination of the Fylde Local Plan and	Identify either the quantum of assistance the Council is willing to provide, or providing a mechanism to enable an early plan review once the scale of the unmet need from Wyre is identified	Extent of unmet need remains unknown; to delay the plan and produce a revised strategy based on an unknown number and incomplete evidence would be premature. It is not good planning to delay plans in the light that new information is yet to come forward. The passage of time always brings forward change to the background within which a plan is to be made; to delay would simply represent unwarranted procrastination. Further evidence will be considered as it is presented and

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					well before its adoption. Therefore any delay would not be significant. Lack of progress of Wyre's Local Plan evidence base is insufficient justification for not satisfying the 'Duty' in direct conflict with paragraph 182 of the NPPF. Any failure to meet the Duty to Cooperate is a breach against the regulations set out within the Localism Act 2011, which places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis1 Local Plans Expert Group recommended that where authorities have failed to reach sufficient agreement on meeting and distributing housing needs by March 2017, the Government should take and use powers to direct the preparation of a high level Joint Local Plan for the HMA.		co-operation will continue, including a review of the present position. It is not the case that Fylde have not satisfied the DtC. This will not be necessary
Hollins Strategic Land LLP		Not specified	Not specified	Not specified	Timetable for adoption is optimistic; whilst it is important that the Plan is not delayed, the Council must ensure that it takes full account of the DtC and delays the progress of the plan until the Wyre evidence base has been completed. It is of benefit to the council to do this so as to ensure the long term robustness of the plan. Particularly so given that Wyre also wrote to other authorities, responses did not suggest that they could assist Wyre in meeting its OAN. Fylde seems most likely to have the land capacity to assist Wyre given it has the fewest constraints.	None specified	The plan should not be delayed pending progress of a neighbouring authority's plan, but the Council is committed to working with Wyre to address issues arising from its emerging evidence and plan.
Singleton Parish Council		Not specified	Not specified	Not specified	Urgent need for consultation between Wyre and Fylde; should be looking together at facilities available for both areas, how to be affected by both	None specified	The numbers indicated as current plans include a number of pending applications and pre-application enquiries. The development strategy

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					proposing adjacent developments. Issues need to be addressed such as schools, health services, flooding etc. Current plans for 240 homes in Gt Eccleston (Wyre), 220 in Elswick (Fylde), 25 in Lit Eccleston (Fylde), more planned for Inskip (Fylde). Now often a 3-week waiting list to see GP at Gt Eccleston, struggling to cope. The needs of one borough should not detrimentally affect the other.		allows for 50 homes in Elswick, allocated through a Neighbourhood Development Plan. The 25 homes in Lit Eccleston is an existing commitment with planning permission. Fylde Council will continue to work with Wyre and the CCG to ensure that any necessary infrastructure requirements arising from developments are delivered.
Stages of Plan Preparation							
Hollins Strategic Land LLP		Not specified	Not specified	Not specified	Overly ambitious timetable .	"should be amended"	The timetable is based on PINS guidance.
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Local plan should command widest possible support. Local Plan Steering Group was formed to help to select the Preferred Options from the five scenarios that were outlined previously: welcomed by members, but dissenting voices proposing amendments were disregarded. The non-Conservative Councillors on the Steering Group felt unable to support several of the policies that were chosen as 'preferred'; were advised that the Preferred Options would be decided by the Cabinet Portfolio Holder and the Policies will not be altered. Was then endorsed by special meeting of full council: votes for amendments were defeated 22 votes to 17; therefore 41% of councillors refused to endorse Preferred Options for public consultation. It is therefore necessary to make our position clear in minority report.	(Specific proposed amendments are considered by individual policy)	This representation was originally made in response to the Preferred Option document in 2014 but has been submitted again in response to the current document. The Publication Version Local Plan was approved by the Council's Development Management Committee for pre-submission consultation on the 15th June 2016, and this Statement of Regulation 20 Consultation and the decision to submit the plan for examination will have been subject to the approval of the same committee before submission. The submission documents therefore reflect the view of the Council.
Gladman Developments		Not specified	Not specified	Not specified	Statutory requirement for sustainability appraisal (S.19 of P&CPA 2004 and SEA Regs). Systematic process undertaken at	None specified	The SA process has been undertaken at each stage of plan preparation, in accordance with the regulations.

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					each stage of plan's preparation, assessing effects of plan against reasonable alternatives; should be clear why some policy options progressed, others rejected; decision-making and scoring should be robust, justified, transparent.		
Shale Gas Exploration, Production and Distribution							
Treales Roseacre & Wharles Parish Council		Not specified	Not specified	No	The Plan does not take into account consequences of national policy relating to shale gas. Fylde will be subject to range of consequences of decisions taken by the Mineral Planning Authority in Fylde. Impacts would be felt against most of the strategic objectives: some positive, most negative. Alternative scenarios should be considered for their impacts on the Local Plan, including effects of: small number of jobs created; up to 31% of people would no longer choose to retire in Fylde; up to 31% of people would no longer choose to visit Fylde; up to 31% of people would no longer choose to buy Fylde food Health Impact Assessment makes no reference to effects of Shale Gas, despite work undertaken by Director of Public Health for Lancashire	The Local Plan needs to explicitly :- 1. Take account of National Policy, specifically relating to Shale Gas 2. Ensure that the evidence base is relevant, complete and up to date 3. Consider the reasonable alternative scenarios relating to shale gas development in and around the Fylde. 4. Consider the benefits and dis-benefits arising from the scenarios 5. Consider the implications throughout the plan; and the consequential impacts upon the evidence base and throughout the proposed Local Plan, such that the appropriate interventions should be incorporated within a further issue of the Local Plan.	Shale gas exploration, production and extraction are only referred to in paragraphs 1.52 and 1.53 of the Local Plan. The impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there may need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area: Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution. Fylde Council is consulted by LCC on planning applications for 'fracking' as a statutory consultee.
CPRE Fylde District		Not specified	Not specified	Not specified	The Plan grossly underestimates responsibilities as they will fall to Fylde Council. Infrastructure, such as: water and waste pipelines; pumping stations, storage tanks and lagoons; electricity and gas supply networks; site access roads; buildings, lighting and fencing.	Policies must be sufficiently robust to protect the existing settlements and the countryside and Green Belt through measures such as: impact on tranquillity, i.e. noise and visual disturbance	Shale gas exploration, production and extraction are only referred to in paragraphs 1.52 and 1.53 of the Local Plan. The impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is

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						especially to habitations; control of flaring of gas; undergrounding of services, pipelines etc.	in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there may need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area: Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution. Fylde Council is consulted by LCC on planning applications for 'fracking' as a statutory consultee.
					Although PPG and the Framework state that LPAs are not to duplicate the work of regulatory authorities, LPAs have responsibility to be satisfied that regulatory authorities can and will discharge responsibilities. Where EA and OGA failing to discharge responsibilities, becomes for LCC to do so; if they fail to enforce a planning condition then for LPA to step in.		
Mrs Richardson		Not specified	Not specified	Not specified	Although only two planning applications so far, extremely likely that the industry would then want to move to a full scale production scenario which would involve hundreds of sites, thousands of wells, across most precious rural areas. Full, long term impacts of large, onshore, unconventional gas extraction industry would have on the Fylde, in particular on agriculture and tourism, not fully considered. Significant detrimental impacts on existing agriculture, food production and tourism sectors/economy and infrastructure; also local impacts such as thousands of HGV movements on country lanes, noise and light pollution and risks to air, land and water, property prices, seismicity and others.	Full independent assessment of full long term impacts and inclusion in the local plan and planning policies	Shale gas exploration, production and extraction are only referred to in paragraphs 1.52 and 1.53 of the Local Plan. The impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there may need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area: Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution. Fylde Council is consulted by LCC on

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							planning applications for 'fracking' as a statutory consultee.

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Chapter 2: A Spatial Portrait of Fylde							
Lancashire County Council		Yes Yes	Yes Yes	No Yes	Reference made to Blackpool Airport EZ Suggested additions to text.	Expand to set out specific support for the EZ. Add text to para 2.29: Lytham and St Annes are predicted to have a significant shortfall of primary school places within the next five years. Therefore, further primary school provision will be required if housing demand and/or births continue to increase at the same rate. There is a shortage of secondary school places in the Fylde District. Add text to para 2.38: Further primary school provision will be required if housing demand and/or births continue to increase at the same rate. There is a shortage of secondary school places in the Fylde District Add text to para 2.46: There are sufficient projected primary school places available in the Freckleton and Warton areas within the next five years. However, a	Not necessary in the Spatial Portrait, but considered elsewhere in the Plan This section is the Spatial Portrait, and therefore it is considered that additional information giving more detail (such as this) should be contained within the relevant policy chapters.

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						number of schools are close to capacity and, should development come forward in these areas and births continue to increase, the available places will soon be absorbed. There is a shortage of secondary school places in the Fylde District. Add text to para 2.57: There are sufficient primary and secondary school places available in the Kirkham and Wesham area within the next five years. However, a number of schools are close to capacity and, should development come forward in these areas and births continue to increase, the available places will soon be absorbed and new provision will be required.	
Lancashire Enterprise Partnership		Not specified	Not specified	No	Reference made to Blackpool Airport EZ	Expand to set out specific support for the EZ.	Not necessary in the Spatial Portrait, but considered elsewhere in the Plan

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Chapter 3: A Vision for Fylde							
Warton East Developments	Satnam Group	Not specified	Not specified	No	"A VISION FOR FYLDE TO THE YEAR 2032", is sketchy and partial, does not address the role of Warton in the development hierarchy for the borough and fails to specify a balanced and appropriate scale of housing growth at the settlement.	This should be amended to set out more clearly for the reader the vision for Warton within the Plan period.	The Vision is not intended to provide a detailed picture of each settlement in the borough in 2032, rather it describes the borough as a whole, and the roles within the borough

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							performed by each of the strategic locations and other major features.
Story Homes Ltd.	Barton Willmore	No	No	No	As drafted, the Vision only refers to the four Strategic Locations. The role of Tier 1 and Tier 2 Rural Settlements in achieving the Council's Development Strategy is understated, even though the Council expects such settlements to play a significant role in delivering the overall strategy.	Suggest the following amended wording: "have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of new homes and employment growth within all of the four Strategic Locations for Development and in the Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements."	The issue of the settlement hierarchy and development locations for Fylde is addressed in Chapter 6. The Vision derives from the development strategy, which locates 83.6% of housing development within the four strategic locations for development over the plan period and only 9.7% in the non-strategic locations. The Vision therefore reflects the emphasis on growth at the strategic locations, with the vision for development in rural settlements reflected in the 7th and 8th paragraphs.
Fred Moor		Not specified	Not specified	No	Excessively aspirational and euphoric; uses jargon better suited to advertising brochure; considers change beyond the scope of planning; in doing so camouflages misinterpretation of number of dwellings and amount of employment land needed. The Vision should also better recognise the value and importance of Fylde's agricultural industry. Spatially this is by far Fylde's biggest industry, yet the Council has no local data from which it can adequately assess either the quality or the importance of Fylde's agricultural land.	Suggests deletion of "its unique qualities including" from 5th paragraph Use a more realistic and less politically optimistic assumption of the extent of the 'growth' that is necessary or desirable in Fylde Include a commitment to a local assessment of the quality and importance of the agricultural land within Fylde.	The Vision reflects the achievable future of Fylde in 2032, following the implementation of the Plan. Tone and language are entirely appropriate. No change. Extent of growth is not expressed in the Vision, but is set out within Chapters 6, 9 and 10. The 12th paragraph of the Vision demonstrates that rural business and agricultural land are valued highly within the plan. Evidence will be gathered when considered necessary.
Lancashire Economic Partnership		Not specified	Not specified	No	Vision refers to an energy hub located "close to" Blackpool Airport Enterprise Zone, contradicts para 9.7.	Should describe the energy hub as being part of the EZ	**MODIFICATION no MNR001**

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Lancashire County Council		Yes	Yes	Yes	Suggested additional text	Add after "completed" in 9th paragraph: "; as would improvements on M55 Junction 4;"	**MODIFICATION no MNR002**
		Yes	Yes	No	Vision refers to an energy hub located "close to" Blackpool Airport Enterprise Zone, contradicts para 9.7.	Should describe the energy hub as being part of the EZ	**MODIFICATION no MNR001**

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Chapter 4: Strategic Objectives							
Strategic Objective 1: To Create Sustainable Communities							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Supports majority of development in sustainable locations, but objective refers only to strategic locations	Amend to include reference towards directing development to all sustainable settlements within the district, including Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements.	The strategic locations for development are the most sustainable locations. The Development Strategy (Chapter 6) provides for 83.6% of housing to be in the four strategic locations and provides for 9.7% in the Tier 1 and Tier 2 Rural Settlements. It is considered important to differentiate, to discourage unsustainable amounts of development to the rural settlements. No change.
					Supports para 4.5 to "encourage" effective use of brownfield land rather than to prioritise as in previous consultation.		Comment noted.
Strategic Objective 2: To Maintain, Improve and Enhance the Environment							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Generally supportive, supports previous change.	None specified	Comment noted.

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Strategic Objective 3: To Make Services Accessible							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Supportive, as it supports the protection and provision of public transport, key services and facilities in Tier 1: Rural Settlements, through the allocation of new housing development. However, should be extended to Tier 2 Smaller Rural Settlements also, e.g. support for Elswick bus service, shop etc. Framework para 55 encourages housing to be located where it will enhance or maintain the vitality of rural communities, therefore imperative that growth in all sustainable rural settlements.	Extend criterion b. to also refer to Tier 2 Smaller Rural Settlements	The wording is appropriate: no change
Lancashire County Council		Yes	Yes	Yes	Suggested additional bullet point	Add text: "G. Seek to resolve congestion and capacity issues on M55 Junction 4 exacerbated by development over the Local Plan period."	**MODIFICATION no MNR003**
Strategic Objective 4: To Diversify and Grow the Local Economy							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Support the Council's aspirations to develop the local economy and meet local employment needs.	None specified	Support noted
Lancashire Economic Partnership		Not specified	Not specified	No	This objective recognises the strategic importance of the Lancashire Enterprise Zone at BAE Systems Warton and Samlesbury.	It should also include the strategic importance of the Blackpool Airport Enterprise Zone.	The Blackpool Airport EZ is recognised as such under point f., but only Warton/Samlesbury has national and international strategic importance under point c. No change.
Lancashire County Council		Yes	Yes	No	This objective recognises the strategic importance of the Lancashire Enterprise Zone at BAE Systems Warton and Samlesbury.	It should also include the strategic importance of the Blackpool Airport Enterprise Zone.	The Blackpool Airport EZ is recognised as such under point f., but only Warton/Samlesbury has national and international strategic importance under point c. No change.

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Strategic Objective 5: To Develop Socially Cohesive, Safe, Diverse and Healthy Communities							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Support the Council's aspirations to develop socially cohesive, safe, diverse and healthy communities as it is consistent with the NPPF.	None specified	Support noted

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 5: National Policy							
Policy NP1: Presumption in favour of sustainable development							
Story Homes Ltd.	Barton Willmore	Not specified	Not specified	Not specified	Support inclusion of PINS model policy	None specified	Support noted
Fred Moor		Not specified	Not specified	No	Concerned about the wording: "will always work proactively with applicants ".Working exclusively with developers on pre-application advice breeds distrust, results in protests.	Replace with "will always work proactively with applicants and the local community".	The Framework, and good planning practice, requires that the Council encourages developers to take up its pre-application services. The Council cannot, in most circumstances, require that developers engage in pre-application discussion, and developers may be reluctant to engage if the wider community is to be involved at the outset. The Council will encourage applicants to engage with the local community where beneficial. To insist that pre-application engagement would involve the community would not accord with the Framework.

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Chapter 6: The Development Strategy							
Policy S1 The Proposed Settlement Hierarchy							
Greenhurst Investments	Indigo Planning	No	No	No	Agrees the Lytham and St Annes is strategic location and Key Service Centre, but remain constraints to accommodate development including very little previously developed land, historic parks and gardens, the seafront, the SPA/Ramsar sites, the internationally-known golf course and Green Belt.	None specified	Constraints are well understood; inclusion of 3 other strategic locations reflects this.
Historic England		Not specified	Not specified	Not specified	Historic Parks and Gardens identified as constraint to development; other heritage assets might also be constraints; however, not all heritage designations necessarily constitute a constraint on development: depends on balance of harm to assets against demonstrable public benefit not met any other way.	None specified	The reference to a constraint here is because it affects the development strategy as a whole: in particular Lytham Hall Park covers a large area around the periphery of Lytham which acts a constraint on the settlement boundary and restricts the contribution that Lytham can make to the development strategy.
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Preferred Options document included SHLAA maps; should have been removed, indicate that development might be acceptable Brownfield or surplus employment land should be used for development, not open countryside; there is enough to accommodate housing and employment needs	None specified	The Policies Map shows sites allocated in the Publication Version. The borough lacks the type or extent of brownfield land often found in others within the region. Employment land is allocated to provide for the needs of employment uses. Without new greenfield allocations, there would remain a very significant shortfall of both housing and employment land.
CAPOW		No	No	No	Wrea Green is Tier 1 Larger Rural Settlement, but now reduced to 1 bus	Re-evaluate status as a Tier 1 Larger Rural Settlement	The Settlement Hierarchy Background Paper considers the services available

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					route, no scope to increase very limited services in central area, fully subscribed primary school. Services not comparable with Staining or Elswick (itself downgraded).		to each settlement and identifies the position of each settlement within the hierarchy.
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Support policy as sets out Warton as Local Service Centre.	Amended to set out more clearly for the reader the scope and range of intended development at Warton within the plan period.	The more detailed role is set out in Policy SL3.
Story Homes Ltd.	Barton Willmore	No	No	No	Objects to downgrading of Elswick to Tier 2 Smaller Rural Settlement. Accessibility scoring in Settlement hierarchy Background Paper is misleading. Scoring is derived from RSS: useful starting point, but should be based on up-to-date policies in Framework rather than revoked RSS. Framework has no criteria defined but identifies core principles and key local services that contribute to sustainability of a settlement, in paragraphs 28, 70. Existing scoring system fails to recognise importance of amenities identified in Framework e.g. public houses, community halls, places of worship, sports venues. Reason for Elswick scoring lower than Tier 1 settlements is lack of primary school, but Elswick does have access to Copp C of E Primary 1.2km to the north of village, within acceptable walking distance and via safe pedestrian routes. Compared to Tier 2 villages Elswick has more services, including 3 bus services, convenience store, village hall, 2 x public houses, church, open space and outdoor sports facilities (children's playground, sports field, tennis courts, bowling club and equestrian centre). The population size of	Designate Elswick as Tier 1 Larger Rural settlement Update the Settlement Hierarchy Background Paper to include assessment of additional criteria in paragraphs 28 and 70 of the Framework	RSS criteria remain a good indicator of sustainability as defined by the Framework as a whole. Identifying two paragraphs that include the features present in the chosen settlement, rather than the whole Framework, represents poor methodology. A 1.2km walk along a rural road does not represent easy access to a primary school, in that walking is unlikely to be the preferred means of access for most people. The scoring system identified Elswick as appropriate for defining as a Tier 2 Smaller Rural Settlement.

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					Elswick is also reflective of Tier 1: Larger Rural Settlements.		
John Coxon	Smith & Love Planning Consultants	Yes	Yes	No	Support revised classification of Elswick as Tier 2 Smaller Rural settlement based on findings of background paper. But of the Tier 2 settlements, Elswick is incorrectly aligned with Clifton as the smaller of these settlements when its sustainability credentials are more akin to Staining and Singleton Notes that whilst no primary school within defined settlement boundary of Elswick, Copp C of E school is 800m from village and well used by families in village. Also additional bus service not mentioned by background paper; therefore sustainability credentials similar to Singleton/Weeton.	None specified	Support noted The plan does not further subdivide settlements below the main hierarchy; however the comment is confused: Singleton is a Tier 2 Smaller Rural Settlement whereas Staining is a Tier 1 Larger Rural Settlement. Copp School is well outside the settlement and does not provide an option within reasonable walking distance.
Telereal Trillium	Smith & Love Planning Consultants	Not Specified	Not Specified	Yes	Fully supports inclusion of Whitehills area as a Local Service Centre	None specified	Support noted
Mr and Mrs McSorley	Smith & Love Planning Consultants	Not Specified	Not Specified	Yes	Fully support the inclusion of Newton as a Tier 1 Larger Rural Settlement; sustainable village, suitable location for growth, services including primary school, village hall and sports field, post office and convenience store, public house and regular public transport connections to Kirkham, Lytham and Preston.	None specified	Support noted
Mr A Bradshaw	Emery Planning	Yes	Yes	No	Wrea Green has been scored overall not dissimilar to Freckleton and higher than Warton, both are Local Service Centres. But scored incorrectly: table in Settlement Hierarchy Background Paper states one bus service with 8 destinations but also has	Wrea Green should be recognised as a Local Service Centre.	The scoring was correct at the time it was undertaken. Alterations to bus services has affected the scoring for a number of settlements. No.61 did not formerly serve Wrea Green and has been diverted to serve it; the no.76

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					no.61 with 2 buses per hour to additional 5 destinations. Wrea Green benefits from services including a primary school, shops, a public house, a hotel, restaurants, post office, church and a large public open space within the centre of the settlement; situated 2 miles from major employment site at Warton; site for 249 new dwellings, far more than Local Service Centre Freckleton, reflecting sustainable nature of Wrea Green.		which was the service reflected in the scoring has been withdrawn completely. The bus service to Wrea Green has improved, but not to the extent implied by the comment. Without a completely fresh exercise covering all settlements, consideration of the changes to one settlement in isolation does not represent effective methodology in supporting the development strategy - no change.
Keith Halliwell	JWPC Ltd	Yes	Not Specified	No	Object to the proposed change for the village of Elswick to a Tier 2 settlement on the basis that the scoring criteria is flawed: being within 10 minutes of a primary school is highly influential in determining position in hierarchy; Copp C of E Primary is approximately an 850 metres walk from the village; strict assessment of distance and skewed scoring methodology allowing only for a score of 0 or 5, impacts so significantly on the outcome of the overall score that it provides an unjustified methodology for assessing the settlement hierarchy. Elswick outscores the other villages in Tier 2 significantly on the majority of the other services and facilities and also has the largest population of these villages.	Seek that Elswick reverts to its previous proposed Tier 1 position in the Settlement Hierarchy in Policy S1 of the Local Plan	Copp Primary School is approx. 1.1 km from the centre of Elswick, which is the reference point used in the study, along a rural road. The scoring reflects the principles of sustainable development, in that it is a reasonable indicator of whether children are likely to walk or not. No change
Metacre Ltd.	De Pol Associates	Not Specified	Not Specified	No	Wesham and Kirkham are one urban area separated by railway line, as acknowledged in para 5.13 of SHLAA, but Local Plan treats Kirkham as Key Service Centre and Wesham is a separate settlement as Local Service Centre	Kirkham / Wesham should not be separated within the proposed settlement hierarchy and should be considered jointly as a single Key Service Centre	The settlements of Wesham and Kirkham are considered as distinct settlements because they have distinct identities, have separate centres, as well as being physically separated. The Settlement Hierarchy Background sets out justification for the position of each settlement within

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					Wesham will perform role of Key Service Centre on completion of Mill Farm Sports Village development; will enhance existing service provision, employment opportunities, retail, leisure, sport and recreational facilities. Wesham will therefore serve a wider catchment area. Treales and other smaller rural settlements are excluded from the settlement hierarchy. Refers to PPG: "all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence." S1 is unsound as not consistent with national policy. Table 2 confirms 998 dwellings needed from windfall development; must be minimum figure otherwise contrary to NPPF.	If Council are determined to treat Wesham as separate settlement, it should be designated as a Key Service Centre Settlements of Treales, Little Eccleston and Wharles ought to be reintroduced to the settlement hierarchy as Tier 2 Settlements	the hierarchy, based on the range of facilities available for residents within each settlement. Designation of Wesham as a Key Service Centre would not be justified given its proximity to the established Key Service Centre of Kirkham, as it could have detrimental effects on existing services provided in Kirkham. PPG is not Policy, and therefore the test of soundness is not affected. However, the evidence provided in the Settlement Hierarchy Background Paper fully justifies the position taken, in that development in rural areas is directed to those settlements where development would be sustainable, based on access to basic services.
Oyston Estates	Cassidy and Ashton	Yes	Yes	No	Policy S1 sets out an appropriate Settlement Hierarchy in so far as it identifies Lytham and St Annes as two of the three Key Service Centres for the borough and also identifies Whyndyke as a Local Service Centre; accords with principles of sustainable development, complies with the requirements of the NPPF.	None specified	Comments noted

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Wainhomes	Emery Planning	Yes	Yes	No	Wrea Green has been scored overall not dissimilar to Freckleton and higher than Warton, both are Local Service Centres. But scored incorrectly: table in Settlement Hierarchy Background Paper states one bus service with 8 destinations but also has no.61 with 2 buses per hour to additional 5 destinations. Wrea Green benefits from services including a primary school, shops, a public house, a hotel, restaurants, post office, church and a large public open space within the centre of the settlement; situated 2 miles from major employment site at Warton; site for 249 new dwellings, far more than Local Service Centre Freckleton, reflecting sustainable nature of Wrea Green.	Wrea Green should be recognised as a Local Service Centre.	The scoring was correct at the time it was undertaken. Alterations to bus services has affected the scoring for a number of settlements. No.61 did not formerly serve Wrea Green and has been diverted to serve it; the no.76 which was the service reflected in the scoring has been withdrawn completely. The bus service to Wrea Green has improved, but not to the extent implied by the comment. Without a completely fresh exercise covering all settlements, consideration of the changes to one settlement in isolation does not represent effective methodology in supporting the development strategy - no change.
Policy DLF1 Development Locations for Fylde							
Home Builders Federation		Not specified	Not specified	No	Housing requirement is not justified or positively prepared.	None specified	Considered under Policy H1.
Martin Clayden		Yes	Yes	No	Elswick downgraded to Tier 2 Smaller Rural Settlement: encouraging. However, still 50 homes proposed. SA states that public transport poor in rural areas, attempts to improve have been unsuccessful; should be ensured there are sufficient school places. Elswick scored low in sustainability assessments; has no school, school, no health centre, dentist or pharmacy and only one small newsagents shop; nearest health centre is 1.5 miles away; nearest supermarket is 6 miles away. Concern over need for private car use to access services, contrary to climate change objective; provision of sufficient school	Revise the plan to achieve compliance to stated objectives in term of transport, education and related aspects of sustainability.	The Settlement Hierarchy background paper considers the services available in settlements; the development strategy apportions development accordingly. Elswick has sufficient services to be classified a Tier 2 Smaller Rural Settlement. For such settlements, a level of growth that maintains the vitality of the settlement is necessary for compliance with the Framework.

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					places will not be met, contrary to objective.		
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Policy is supported.	None specified	Support noted
Persimmon Homes		Not specified	Not specified	Not specified	It is appreciated what the intention of this policy was, but development in most cases will change and therefore prevent the existing land use continuing. This is also repeated within Policy GD7 at point 't'.	A change of wording is recommended.	**MODIFICATION no MNR004** …existing land uses *outside the application site*, including…
Story Homes Ltd.	Barton Willmore	No	No	No	Scale of sites developed at Fylde-Blackpool Periphery means may be multiple housebuilders: but delivery rate must not be overestimated as increased local market competition can dampen delivery rates; rate of delivery should be decreased proportionately with each new additional developer to take account of effects of market saturation. Delivery of sites HSS1, MUS2, MUS1 and HSS5 difficult due to multiple ownerships, upfront infrastructure investment needed; cannot be reasonably expected to contribute to short-term supply needs. Unclear what is included within "allowances"	Consider allocating sites within Tier 1 and Tier 2 rural settlements such as Elswick, allocating more sites within these settlements will ensure more housing comes forward earlier in the Plan period Revise Table 2 to itemise what is included within allowances	Allocating more sites in smaller settlements would result in a less sustainable overall strategy, and could adversely affect delivery rates at the strategic sites. No change Allowances and unallocated sites are set out in the Trajectory. The purpose of Table 2 is to set out the overall contribution of the strategic locations to the overall strategy - no change.
Royal Mail Group	Cushman and Wakefield	Not specified	Not specified	Not specified	Housing development of the scale proposed could result in need for Royal Mail to extend delivery offices or build new ones; rule-of-thumb calculation is 400 dwellings to 1 postal round/walk, 1000 dwellings could trigger need for new delivery office. Would welcome further engagement with Fylde Council,	None specified	The Council welcomes Royal Mail's suggestion of further engagement, and will pursue it.

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					particularly regarding suitable sites to serve proposed new communities.		
Mr D. Haythornthwaite	PWA Planning	Not specified	Not specified	No	No allocations listed in Wrea Green; only commitments: likely to be a period of no further development after commitments are completed. Plan is therefore not positively prepared.	Add allocations at Wrea Green, then reflected by listing Wrea Green within Policy DLF1	Considered under Policy SL5
Anthony Guest		Not specified	No	No	Selection of Warton as strategic location unsound and possibly illegal. Preferred Options document bore little resemblance to previous options presented, failed to reflect consultation, no alternative strategic locations were presented: unjustified. No justification for Warton put forward in text; states that will become more sustainable over lifetime of plan; this acknowledges current unsuitability of Warton. Process therefore not legally compliant.	None specified	Selection of Warton occurred at an earlier stage is the plan process. At the current stage, identification as a strategic location is inevitable based on existing commitments of 840 homes.
Telereal Trillium	Smith & Love Planning Consultants	Not specified	Not specified	Yes	Fully support inclusion of Whitehills Local Service Centre within Fylde-Blackpool Periphery Strategic Location for Development.	None specified	Support noted
BAE Systems	Cass associates LLP	Yes	Yes	No	Acknowledge that development of retail centre on land at Lytham Rd Warton could support aspirations of EZ by providing facilities to those employed on EZ. Any aspiration for such uses on land within the EZ will need to be considered and agreed by the LEP, LCC and other stakeholders.	None specified	Comments noted. This is not taken to be an objection to inclusion in the Plan, but delivery will require agreement between parties once a specific scheme is put forward.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Policy only allows for windfalls at strategic locations.	Should be flexibility for windfall sites to come forward outside of Strategic Locations	The policy does not act to exclude windfalls elsewhere, but they are referenced here as an element of the development strategy Agreed

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					Final part of policy seeks to ensure that new development would not prevent/undermine the operations of existing land; policy should not seek to prohibit the redevelopment of sites that are in active use: not positively prepared or justified	Clarification is required to make it clear that the purpose of this part of the policy relates to ensuring neighbouring uses are compatible and can co-exist without any detriment to amenity or existing operations/activities.	**MODIFICATION no MNR004**
James Hall & Co Ltd	Smith & Love Planning Consultants	Not specified	Not specified	No	Small housing sites and windfall housing development will occur across the borough. Policy should permit them on this basis and not exclusively within the Strategic Locations for Development and within and adjacent to the Tier 1 and Tier 2 settlements as the proposed policy wording implies.	Proposed revised wording: Windfalls and non-strategic sites will occur within the Strategic Locations for Development. An allowance should be made for windfalls and non-strategic sites within the Strategic Locations for Development and within and adjacent to Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements, and in other sustainable locations across the Borough	Policy DLF1 makes an allowance for non-strategic sites within the strategic locations and within and adjacent to the Tier 1 and Tier 2 Rural Settlements; development outside those areas would be subject to Policies GD1-5. Windfall sites would similarly be subject to other policies of the plan but because they are generally on previously-developed land, the principle of development is typically favourable. No need for additional references in strategic policy - no change.
Mr & Mrs McSorley	Smith & Love Planning Consultants	Not Specified	Not Specified	Yes	Support general distribution; plan makes clear insufficient land within existing settlement boundaries; need for greenfield development on edge of existing settlements; additional greenfield development at Newton therefore required and supported; would help sustain and foster local community services and village facilities.	None specified	Sites at Newton are allocated under Policy SL5 in accordance with the development strategy.
Strategic Land Group	Turley	No	No	No	Locational strategy of the FLP underpinned by four strategic locations, including Blackpool-Fylde Periphery (BFP); development in most sustainable parts of borough, implies strategic locations fit this	None specified	Comments noted

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					description; sustainability of these will improve as development comes forward, including small shops, community centres and on-site open space; as example, two local centres, primary school and employment are part of permission for MUS2; other large developments will add to range of facilities in area.		
Mactaggart & Mickel	Colliers International	No	Yes	No	Policy DLF1 states four Strategic Locations will accommodate the majority of new development and that non-strategic developments will occur at the edge of Tier One – Larger Rural Settlements; landholding at Moss Side Lane, Wrea Green can accommodate 50 units; their landholding at Moss Side Lane, Wrea Green is a site that can accommodate a non-strategic development of 50 units or thereabouts Distribution of non-strategic sites at under 10% of the housing requirement, 762 units is too low a percentage; strategic locations to have 80% is too high a concentration. Any delays to infrastructure provision at a strategic location would have a disproportionate effect on the plan. To have higher proportion of allowances and unallocated at 12.6% does not represent sound planning approach.	None specified but seeks allocation of additional site None specified	The development strategy provides for the majority of development to be located in the strategic locations. Allocating further sites outside the strategic locations would result in a less sustainable strategy and plan. The development strategy directs development to the most sustainable locations, which are the strategic locations. The selection of four strategic locations avoids problems for over-reliance on a single location, and is deliverable.
Gladman Developments		Not specified	Not specified	Not specified	Commend council's use of "minimum in relation to the council's housing target of 7,768. A large proportion of the borough's growth is directed to urban extensions, to which Gladman have fundamental concerns regarding timing and delivery; borough contains a range of suitable and sustainable settlements; sustainable rural	None specified	Support noted The development strategy allocates development to the most sustainable locations. Disproportionate amounts of growth allocated to rural settlements would not represent sustainable development - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					settlements should be apportioned meaningful growth to support to ensure ongoing vitality and viability; Whilst some settlements are small scale, setting and character are important, but should be balanced against needs of local community for new housing, to support long-term viability of services Policies should not contain any unsubstantiated limitations that may preclude the delivery of sustainable development. In this regard, we do not consider it effective or justified that the Council's proposed figure on non-strategic development sites (10-99 homes) to accord with the minimum housing target.		The plan seeks to deliver housing necessary to meet local needs and to maintain the viability of services. Very small-scale settlements with very few or absent services would not be sustainable locations for the allocation of development in the plan. The apportionment of the total housing figure between the strategic locations is clearly shown. The non-strategic locations represent almost 10% of the plan total. This is considered entirely reasonable, based on the location of the borough's main services and infrastructure.
Hallam Land Management	Pegasus Planning	Not specified	No	Not specified	Object to the overall apportionment strategy, in particular Warton's apportionment. Distribution strategy changed significantly since 2013 (the Preferred Option); notable decrease at Warton from 17% down to 10%, increase at other 3 strategic locations 51.8% up to 73.0%.	None specified	The strategy has changed to reflect responses to the earlier stages of consultation, but also to reflect permissions granted elsewhere, in several cases on appeal.
Taylor Wimpey	Cushman & Wakefield	No	No	No	Request clarification how scores in Strategic Site Assessment utilised in determining which sites allocated: high scoring sites such as 'Land North of Weeton Road, Wesham' and 'Land South of Weeton Road, Wesham' not taken forward, whereas lower scoring sites were allocated.	None specified	The results of the Strategic Site Assessment were carried forward to the Site Assessment Background Paper 2016, which provides the justification for allocation or non-allocation of sites.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Keith Halliwell	JWPC Ltd.	Yes	Not specified	No	Support Policy DLF1 in its approach to allow for non-strategic sites within and adjacent to Tier 1 and Tier 2 Settlements.	None specified	Comments noted
Oyston Estates	Cassidy & Ashton	Yes	Yes	Yes	Identification of Lytham and St Annes, and the Fylde- Blackpool Periphery as Strategic Locations for Development is supported; majority of new housing allocations should be concentrated in these locations in order to accord with the principles of sustainable development.	None specified	Comments noted
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Table 2 is not supported; rationale for distribution of housing is flawed and not reliable; the % of housing provided at Warton should increase, irrespective of the requirement figure	Distribution should be amended to reflect the potential for sustainable development at Warton	The distribution reflects existing commitments, and provides a balance of development at the different strategic locations that reflects existing and potential infrastructure / service provision and constraints - no change.
James Hall & Co Ltd	Smith & Love	Not specified	Not specified	No	The Policy states that small sites and windfalls will occur within the Strategic Locations for Development and within and adjacent to Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements; but small sites and windfalls will occur across the borough and the policy should permit them on this basis; conflicts with Policy GD5 which allows redevelopment of large developed sites in the countryside for mixed use development; also Policy SL5 which acknowledges development at other locations, including smaller schemes / infill schemes (para 7.21). Local Plan should take a consistent approach towards the location of small site and windfall new housing development	The wording of the part of draft Policy DLF1 relating to "Windfalls and Small Sites Allowances" should be revised to clarify as follows; Windfalls and non-strategic sites will occur within the Strategic Locations for Development. An allowance should be made for windfalls and non-strategic sites within the Strategic Locations for Development and within and adjacent to Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements, and in other sustainable locations across the borough.	The strategic locations and Tier 1 and Tier 2 Rural Settlements are the sustainable locations in the borough. The Policy is considered appropriate: no change

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Mr Chris Hill	De Pol Associates	Not specified	Not specified	No	Comments received relate to the proposed new local centre at Warton. The identification of this centre on the Policies Map is considered not sound and does not meet the requirements of the plan. It is considered that the Local Plan is not sound when considered against the tests outlined in paragraph 182 of the Framework for the following reasons: The proposed Local Centre site has not been assessed to establish whether it can meet the infrastructure requirements of the proposed housing allocations for the settlement. There is limited opportunities to meet the recognised lack of services and facilities to deliver the plan. The site submitted in these representations would provide scope for a range and variety of services which would meet infrastructure requirements and provide for a sound plan The location of the proposed Local Centre is not justified. The location has been identified but it would appear that consideration has not been given to a new location which could provide modern purpose built facilities to operate alongside the existing limited range of services in the settlement. This alternative strategy of a new facility should be considered a more appropriate strategy.	The local centre should be relocated to the location identified on the accompanying plan (Ref: DPA_01	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The blue triangle on the Policies Map is indicative only. The Council will work with various stakeholders to find the most suitable location to develop the local centre. Also considered under EC5.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 7: Strategic Locations for Development							
Metacre Ltd.	De Pol Associates Ltd.	Not specified	No	No	Requirement in Framework to boost significantly the supply of housing, requirement for 5-year supply of housing, but SL1 to SL5 fail to allocate sufficient land to meet need including unmet need in Wyre, fail to meet 5 years at 370 anyway, in particular fails to allocate enough land to deliver 370 over the plan period. PPG states that shortfall to be made up over first 5 years of plan period wherever possible, accepted by council in its 5 year supply calculation; council states in Trajectory that supply of 3546 homes in first 5 years, against requirement for 3181, but sites will not deliver these: • HSS3 Coastal Dunes (Persimmon) supposed to deliver 300 (60 homes pa) but only 13 delivered 2015-16, being built in two phases but only one has full permission: therefore only likely to deliver 150 • MUS2 Whyndyke: Trajectory shows 150 within 5 years, 30 in 2018/19 then 60 based on 2 developers, but outline permission not granted as Section 106 not signed, applicant is landowner so contracts required between owner and developers before reserved matters applications, remain many pre-conditions on outline: start to housing delivery within 18 months unlikely, therefore slippage probable: 1 year slippage costs 60 from 5-year supply	Additional land should also be allocated for housing development in policies SL1 to SL5 in order to deliver the borough's housing need, including a continuous deliverable five year housing supply. (Refers to site specific representations to individual policies proposing the allocation of additional housing site).	Sufficient land is allocated to provide for the housing requirement. Allocations and delivery rates have the support of the Council and applicants/ developers. Allocation of further, less sustainable sites would crowd the market and only result in slower delivery rates at the existing allocations - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					• HSS1 Queensway: Trajectory shows 270 over 5 years, but only reserved matters approval for 110 homes, not started; delivery not to start until October 2017 due to need for agreement to highways infrastructure works: therefore slippage will lose 90 homes from 5 year supply • HS28 Sunnybank Mill: listed for 15 homes but only resolved to approve in outline 11 years ago, no section 106 completed: not deliverable, should not be included • Empty homes allowance of 50 should not be included due to lack of evidence • Elswick: Trajectory includes 40 coming forward through NDP allocations, but cannot reasonably expect NDP to proceed quickly enough to deliver homes: currently neither allocated nor with planning permission. With OAN of 7768, need for significant buffer to ensure plan is positively prepared: 123 is not sufficient. Even then 370pa considered too low to start with.		
Story Homes Ltd.	Barton Willmore	No	No	No	Concerns over assumptions about delivery rates of strategic sites by council: whether Queensway (HSS1), Whyndyke Farm (MUS2) and Cropper Road (MUS1 and HSS5) will deliver the proposed number of dwellings within the plan period given the significant amount of upfront investment and infrastructure required.	None specified	Allocations and delivery rates have the support of the council and applicants/ developers - no change.
Policy M1 Masterplanning the Strategic Locations for Development							
Historic England		Not specified	Not specified	No	Masterplans should address issue of heritage conservation: requires assessment of extent to which the historic	Even where public benefits are identified, and cannot be met in any other way, they	**MODIFICATION no MNR005**

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					environment should be safeguarded; may conclude that a site should be avoided altogether because of unacceptable impacts upon it.	are still required to outweigh the harm to any heritage assets affected.	Replace "without the public benefits means that" by "unless the public benefits outweigh the harm to any heritage assets"
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Not supported. Master plan and design codes are not required for each of the strategic development locations; policy appears to be a recital of basic development control policies and procedures that would apply in any event. The policy is not required.	Delete policy	The masterplanning Policy M1 reflects the contribution of a number of large development sites to the significant growth of certain settlements, and the need for these to be planned to ensure sustainable patterns of development - no change
Next plc	Peter Brett Associates	Yes	Yes	No	Support Policy M1, note in particular requirement for masterplans to fulfil all stipulated criteria, note particular criteria d,e,f.	None specified	Support noted
Persimmon Homes		Not specified	Not specified	Not specified	Number of strategic locations already subject to planning permission; adoption of masterplans separately outside planning application process assumed not appropriate; requirement to adopt as SPD unnecessarily cumbersome, does not represent positive planning. Requirements for the masterplan overly prescriptive, extend to detail e.g. secured by design, long term management of landscaping, rather than the principles of development. Elements included that are not appropriate in advance of an application e.g. archaeological investigation.	Production and approval of as part of first application on the sites (where that hasn't already occurred) Masterplan should be restricted to setting out the principles for development	There remains an opportunity to undertake the exercise even where outline permission has been granted, in the interest of ensuring sustainable development - no change. Policy M1 lists essential considerations in producing the masterplan. A masterplan produced without considering each would be unlikely to result in deliverable, sustainable communities. No change
Story Homes Ltd.	Barton Willmore	No	No	No	Policy is unduly onerous, not sufficient flexibility, subjective criteria require professional judgement, must satisfy all criteria. Time taken to produce will delay delivery.	Should introduce the term "where possible"	Suggestion would render the Policy wholly impotent and allow disregard for criteria. Since the Policy relates to considerations in the production of a masterplan, it would be a very poor

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							development of strategic size that failed to consider each - no change.
Anthony Guest		No	Yes	No	The process of producing Masterplans that was planned as a precursor to moving forward with the Warton (and other) SLDs failed to be progressed by the Council. Reference in Policy SL3 to Masterplans….'where they do not have planning permission' is frankly deceitful given the absence of masterplans and the Council's recent failure to contest the granting of planning permission. The impact of the development being undertaken in Warton set against the paucity of infrastructure planning and investment represents a disgraceful abnegation of the planning process.	Delete Policy M1 since it is meaningless and incapable of meeting the need it was set up to meet. Leaving ineffective and irrelevant policies in place often leads to unforeseen consequences.	The requirement for masterplans provides an effective mechanism for making strategic development sites more sustainable by ensuring issues are considered at the outset - no change.
Greenhurst Investments	Indigo Planning	No	No	No	Object to Policy M1; need to agree SPDs with council before outline application will result in delays, is contrary to government's initiative to streamline planning process; will be unnecessary regulatory barrier to growth; many of requirements are validation requirements, policy therefore requires doubling up, but information would be out-of-date quickly.	Not specified	The absence of a masterplanning policy would result in development sites coming forward piecemeal; failure to comprehensively plan would result in unsustainable communities and development that failed to have proper regard for the constraints and opportunities of sites - no change
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	Highly questionable if SPDs are necessary; can be achieved with DM criteria in the rest of the plan; additional layer of complexity will lead to delays; for 57 allocations would be unworkable.	References to SPDs removed; clarify nature and type of masterplanning required for each of the different SLDs	The absence of a masterplanning policy would result in development sites coming forward piecemeal; failure to comprehensively plan would result in unsustainable communities and development that failed to have proper regard for the constraints and opportunities of sites - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Policy SL1 Lytham and St Annes Strategic Location for Development							
Story Homes Ltd.	Barton Willmore	No	No	No	Concerns over assumptions on delivery rates of strategic sites. HSS1 Queensway: full approval is for 110 homes, with further 927 pending decision for reserved matters; Kensington will develop whole site alone, therefore 60dpa in Trajectory is unrealistic; depends on delivery of link road in 2019, but initial phase depends on roundabout: not started therefore would not expect delivery until 2019; unlikely that full 1150 homes in the plan period, at realistic delivery rate will be 390 over the plan period. Accepts that other sites listed are deliverable and will contribute to requirement.	Need for further sites allocated to meet OAN	The Trajectory shows only 930 of the 1150 will be delivered within the Plan period. The delivery rate reflects Council's evidence on rates of delivery - no change.
Oyston Estates	Cassidy & Ashton	Not specified	Not specified	No	Need to allocate sufficient land in appropriate locations; should allocate land at North Houses Lane; supported by Examiner of St Annes NDP who included within settlement boundary; more sustainable than alternative sites as would form sustainable urban extension to principal settlement in borough; immediately adjacent to approved scheme HSS1 for 1150 homes; sites lie within short distance of range of services and facilities, accord with principles of sustainable development; represent logical rounding off of built-up area. Site to be phased, western portion first, to assist in funding of link road; 750 homes in total; to accord with Healthy New Town and St Annes Garden Village principles; would include provision of a Local Centre benefitting both new and existing development.	Revise settlement boundary to include land at North Houses Lane, for reasons set out by St Annes NDP Examiner	The Local Plan allocates sufficient sites to meet the housing requirement. Additional sites are therefore not necessary. The sites are a designated BHS.

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					Sites were allocated in Preferred Options Local Plan 2013; were later deleted from Revised Preferred Option due to existence of Biological Heritage Site, although this was known when allocated. Lytham Moss BHS is important as winter feeding ground for pink-footed geese and whooper swans. Council lacks 5 year housing supply, therefore need for additional allocations; Para 47 of Framework requires Councils to boost significantly supply of housing, identify key sites; these sites would provide significant contributions to Moss Link Road (as no other site), significant education contributions, supply of housing including affordable housing/starter homes, New Home Bonus, Council Tax, Economic growth, development in sustainable location with access to range of services amenities and transport options, proximity to employment leisure and tourism opportunities, biodiversity enhancement, high quality design, green infrastructure and open space. Only constraint is BHS, but Examiner at St Annes NDP stated that any ecological concern to be dealt with at planning application stage; movement of settlement boundary to incorporate the sites would offer the town flexibility to meet its housing needs over the next 15 years, but within the defensible line of the green belt. Site surveys undertaken, no PFGs, Whooper Swans or Bewick's swans observed; sites have no substantive value as feeding grounds, justification for designation is no longer applicable		

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Greenhurst Investments	Indigo Planning	No	No	No	Object to Policy SL1: do not agree with number of homes and employment sites; do not agree with locations for development; do not agree with commencement dates of number of sites. Comments relate to employment site ES1.	None specified	Specific comments regarding the site concerned are considered under Policies EC1 and GD8
Ideal Corporate Solutions	Emery Planning	Yes	Yes	No	Boundary of allocation HSS1 drawn too narrowly, regard had only to Queensway, excludes other appropriate development land, 2 sites including client's Valentine Kennels site, with which would form logical development parcel. Sites included as allocation in Draft Revised Preferred Option document, but Chairman of Development Management Committee had stated that Council previously agreed to their deletion, committee agreed to deletion. Outline application for 53 homes refused contrary to officer recommendation; current appeal, public inquiry scheduled March 2017. Not allocated due to BHS: basis of BHS was breeding colony of tree sparrows, but because nesting box scheme was not maintained, the population has declined; reasons for designation therefore no longer apply to the site.	Site at Valentine's Kennels should be included within allocation HSS1, or in the alternative included as a separate allocation for residential development.	The Site Assessment Background Paper excluded the site on the grounds of the BHS. The Council acknowledges that the ecological grounds for not allocating the site no longer apply. Planning permission was refused on the grounds of traffic on Wildings Lane, disjointed and piecemeal development and visual impact; the appeal remains undetermined - no change.
Policy SL2 The Fylde-Blackpool Periphery Strategic Location for Development							
Strategic Land Group	Turley	Not specified	Not specified	No	Fails to identify sufficient sites to meet the employment and housing land requirements, particularly if an increased requirement is proposed. This is despite there being deliverable sites within the Blackpool-Fylde Periphery Strategic Location, notably the land at Peel Hill.	The land at Peel Hill should be allocated under Policy SL2 (and shown on the proposals map) as a mixed use site within the Blackpool-Fylde Periphery Strategic Location	The Local Plan allocates sufficient sites to meet the housing requirement. Additional sites are therefore not necessary.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					The site Land at Peel Hill: in Fylde-Blackpool Periphery; S of M55, E of A583 Preston New Road; in Whitehills area; approx. 30ha. in single ownership, comprises farm house, outbuildings and associated agricultural land, operational caravan park, dwelling; to W of site is Whitehills Business Park (various commercial uses, old Local Plan allocated as employment land EMP1 and 2, some allocations in emerging plan); to N is Whyndyke Farm (allocated for development as MUS2, will include health centre, primary school, two neighbourhood centres, employment land). Fylde-Blackpool Periphery supported as strategic location; benefits of growth in this location include: • Proximity to key employment locations including land at the Blackpool Airport Corridor, the Enterprise Zone and at Whitehills and existing employment areas around J4 • Good access to the motorway network • new local (retail) centres at Whitehills • less impact on landscape than sites in more rural areas, and without adverse effects on character of rural settlements Study concluded that wider junction 4 area could accommodate 5,000 – 6,000 homes, 56ha of additional employment land. One of most sustainable locations in borough. Site not allocated despite this: surprising; reasons for not allocating challenged: • Council says more sustainable to distribute development throughout borough, but no specific issue against increasing development at this		

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					location, inclusion of 500 more dwellings would not prejudice spatial distribution as proportion at this location would increase from 29.3% to 33.5%: immaterial increase given benefits of increased supply and reduction in reliance on windfall sites (proposed to be 12.6%, not compliant with framework) • Council suggestion that site is separated from built up area is wholly incorrect; vast majority of area between site and Blackpool boundary is built development, also major transport infrastructure, also much new consented development reflecting status as strategic location, existing bus services run adjacent to site frontage, expected further improvements to bus services given strategic location status • Visual impact: site enclosed by M55 to N, very substantial band of mature trees to E, residential caravan park to S and A583 to W: defensible boundaries which development of site would strengthen; given existing elements of development on the site, not considered particularly sensitive location; Council's appraisal identifies measures to limit impact, recommends limits to building heights, massing and density on higher parts of site and landscaping buffer. Therefore, unclear why site is less preferable than other greenfield sites in the area.		

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Balfour Beatty	Nathaniel Lichfield & Partners	Not specified	Not specified	No	Concerns over lack of alignment with objectives of Enterprise Zone	None specified	Considered under Policy EC4
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Whyndyke came out as most popular option in last round of consultation. Landowner informs that could deliver 1,500 homes in plan period, plus school, roads, shops, cycle lanes and employment land; therefore support removing EC1, replacing with SL2 as strategic location.	None specified	This response is a copy of what was previously submitted to the Preferred Options document, and reference to the "last stage of consultation" refers to the Issues and Options stage. The Preferred Options Version did include Whyndyke as a mixed-use site. Policy EC1 was the employment sites policy in the Preferred Options document that allocated sites across a range of strategic locations. The Publication Version Local Plan Policy SL2 includes Whyndyke as a strategic site. It is therefore assumed that the respondent supports the Policy.
Next plc	Peter Brett Associates	Yes	Yes	No	Helpfully Policy SL2 the Fylde-Blackpool Periphery Strategic Locations for Development, allocates the Whyndyke Farm site for a mixed use development and states that proposals for the delivery of 810 homes and 20 hectares of non-residential development will be supported. The text also states that masterplans and approved design codes for each site should make provision for a range of land uses to include homes, employment and commercial uses.	None specified	Support welcomed
Persimmon Homes		Not specified	Not specified	Not specified	HSS4 – Coastal Dunes Persimmon Homes are developing the first (southern) phase of the former Pontins site; application currently in for northern portion of site; working with DM officers to get the	On this basis this Policy requires amending to reflect reality.	Now expected to be considered at December committee meeting. **MODIFICATION no MNR006**

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					application to the October Committee meeting; in-principle officer support for overall number of 429 units across the site; already delivering on site so no lead-in period for next phase; anticipate delivering all units within the Plan period.		Change overall number in policy and Trajectory, also in overall numbers in other policies
Story Homes Ltd.	Barton Willmore	No	No	No	Concerns over assumptions on delivery rates of strategic sites. HSS4 Coastal Dunes: accepted that will be delivered but considered that consistent delivery of 60 dpa unrealistic for one developer; based on past delivery rates 20-25 dpa likely at best MUS1 Cropper Road East: Wainhomes development commenced for 146 homes, complete in 2022, but one of other 3 outline applications also Wainhomes, so unlikely to deliver until first site complete; site is isolated from settlements and services; delivery of remainder dependent on improvements to local infrastructure, potential to stall if not in place; market competition of other sites within Fylde-Blackpool Periphery likely to dampen delivery rates; therefore high proportion of dwellings likely to come forward late in Plan period. MUS2 Whyndyke: minded to approve outline, dependent on infrastructure (primary school, health centre, local retail centres, improvements to Jn 4 M55) but no S106 yet signed; Trajectory assumes 30 homes in 2018-19 then 60 dpa until 2032, conservative delivery rate more appropriate than RPO but still doubts, whilst no committed funding, whether deliverable.	Need to adjust Trajectory Need to adjust Trajectory	The Council disagrees - no change. The Council disagrees - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					HSS5 Cropper Road West: significant highway improvements to Cropper Road required to facilitate development; unavailable, in multiple ownerships, potential to affect lead-in time; dependent on provision of facilities and services at Whyndyke and improvements to Jn 4 M55 which have unknown timescales; competition from other sites within Fylde-Blackpool Periphery could dampen delivery rates	Remove allocation from Local Plan	The site is deliverable, has the full support of the developer Wainhomes (see representation) and would contribute to a critical mass of development in this strategic location that will support the provision of services - no change
					HSS6 LSA Way Whitehills: commenced; accepted that will be delivered within plan period		Support welcomed
					HS21 Westgate Rd Squires Gate: expected in plan to deliver 70; but application for 72 was never determined; approval July 2016 for 25	Remove 45 units from overall supply	There is an existing approval, and another application which the council has resolved to approve subject to a Section 106 agreement, for retail development on the remaining part of the site. The application for 25 residential units was approved subject to a Section 106 agreement. 25 is now the maximum number of homes likely to be achieved on the site. **MODIFICATION no MNR007** Change housing numbers and Trajectory
Telereal Trillium	Smith & Love Planning Consultants	Not specified	Not specified	No	Fully support identification of land in client's ownership within strategic location for development, but disagrees that site ES4 should be limited to B1, B2 and B8 employment development; site lies immediately adjacent to site MUS1 which includes housing and employment uses; no reason for showing separately other than	Telereal Trillium requests that the following revisions are made to the draft Plan: i) the proposed allocation of its 2.4 ha of land at the Whitehills Local Service Centre identified as parcel ES4 for Class B1, B2 and B8 employment uses, is deleted	The Council must balance employment and housing allocations to ensure a deliverable supply of both - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					to roll allocation forward from old Local Plan: missed opportunity because: • Never developed within 20 years of previous plan period, Framework says avoid long-term protection of employment sites where no reasonable prospect of such use; • Land lends itself to inclusion in MUS1 to improve prospect of development, avoid sterilising. Attraction as employment site is constrained by overhead power lines crossing site Disagrees that site ES6 should be restricted to B1, B2 and B8 uses.	from the schedules in draft Policy SL2, draft Policy EC1 and from the draft Policies Map; and alternatively; ii) its 2.4 ha of land is incorporated into an enlargement of the proposed mixed use allocation MUS1 for residential and non-residential uses, and is shown as part of the MUS1 allocation on the draft Policies Map. Allow broader range of acceptable use classes in respect of ES6 including Classes A1, A3, C1, D1 and D2 and Sui Generis uses.	Considered under Policy EC1
The Caravan Club	Savills	Not specified	Not specified	Not specified	Relates to Blackpool South Caravan Club site east of Cropper Road. Site is 2.15 ha, accommodates 95 pitches all on hardstanding, existing buildings (reception, information room, warden's and assistant's accommodation, toilet/shower block), existing internal tarmac roads: should be considered previously-developed land; hedgerows on all sides, mature trees on north side. Good public transport links: bus stop 200m from site, adjacent to A5230; services close to site include supermarkets, restaurants, pubs, national retailers, post office; within 2km of 2 primary schools, within 2km of secondary school. Club would need to expand if were to remain *in-situ*, but not accommodated in the Local Plan as area to NE allocated in MUS1; site will be bounded by development all round, considered non-	Include the site within the residential allocation, assist club with securing suitable alternative	Loss of the caravan site would not represent sustainable development. Not justified to allocate the site for housing development ahead of securing an alternative site for the caravan site.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					compatible uses (redevelopment would have potentially detrimental impact on quality of setting and service provided to members); logic in designating site for residential development if suitable alternative site for club could be identified; site is brownfield land, close to settlement boundary of Blackpool, has services in proximity: would be sustainable development.		
Oyston Estates	Cassidy & Ashton	Not specified	Not specified	No	Support identification of Whyndyke Farm within the strategic location.	None specified	Support noted
Wainhomes	Emery Planning	Yes	Yes	No	We support the allocation and the extension of the settlement boundary as proposed. Developer's reports prepared on basis of 450 dwellings, therefore propose revision to state 450. Vast majority of road frontage to site controlled by client, active developer in NW; site to be brought forward asap (planning app May 2017, site prep Autumn 2017, completions start Jan 2018). Need for comprehensive masterplan acknowledged; illustrative plan submitted with representation; would provide 30% affordable housing, new local centre, open space, habitat creation, widening of Cropper Road to 6.0m throughout plus 4.0m shared footway/cycleway on E side, 2.0m footway on W side (details attached to representation). Flood risk statement prepared in support, concludes that runoff can be sustainably managed in accord with NPPF and local	Request correction to the wording of Policy SL2: table should state: HSS5 Cropper Road West, Whitehills 450 23.1Ha 2017-18 Request clarification that masterplan to be for HSS5 only Proposes revised supporting text: Any planning application for the development of this site will need to be accompanied by a comprehensive masterplan to be agreed by the Council, which will need to include the site for a local (retail) centre, serving Whitehills. There are surface water and wastewater issues at land at Junction 4 of the M55 and road improvements will be required to the	Housing numbers and Trajectory to be altered to reflect new information. **MODIFICATION no MNR008** Note that the area in Hectares in the tables within Policies SL1-5 is the site area for non-residential development; it is assumed that this was not understood by the respondent. Unclear what is meant in relation to the masterplan. Only represents a change in timing, under modification listed above.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					policy; ecology report produced, concludes no constraint on whole site coming forward for development; utilities statement produced (attached to representation) covering electricity, water, gas, BT Openreach, cable, foul water and surface water, prepared following discussions with statutory authorities, concluding that all services are available and there is capacity.	junction. However, it is anticipated that development of housing on this site could start in 2017/18, with completion by 2027/28	
Policy SL3 Warton Strategic Location for Development							
Mr M James	Steven Abbott Associates	Not specified	Not specified	Not specified	Settlement boundary has been moved to coincide with edge of site HSS2, but green belt boundary has not. Plan states that green belt boundaries will be adjusted to amend minor anomalies. Anomalous finger of land would then remain within green belt, narrow and unable to serve any purpose	Green Belt boundary should move to exclude area of land now within site and settlement boundary. Move Green Belt boundary to exclude anomalous finger of land at Syke Hall.	The green belt should not be moved. The development on the site HSS2 is planned such that the area of the site within the Green Belt would remain undeveloped. It will therefore continue to fulfil the aims of Green Belt land - no change. Anomalous finger of Green Belt land would only occur if the Green Belt boundary were moved, but as stated above, this is not appropriate - no change.
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Client controls Land East of Warton site, subject of recent public inquiry, results awaited; at inquiry a council officer confirmed that no objection to principle of housing on the site; agreement from LCC that highways impacts can be satisfactorily mitigated; site accepted by the council as sustainable development, creates no unacceptable landscape impact, creates no unacceptable ecological impact and can be accessed satisfactorily with no unacceptable impact on local highway network.	Allocation of Land East of Warton for development within the plan period.	The Council agreed that it had no objection in principle to housing on the site, in the light of the lack of a five-year supply of housing and the principle in favour of sustainable development. Other issues, including the mitigation of traffic impacts, and infrastructure contributions, could not be resolved. The development strategy allocates sufficient sites in the plan to provide for the housing requirement, without requiring this site. Too much development in Warton would result

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							in an unbalanced development strategy - no change.
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Extensive development proposals encircling Warton will increase scale of village by more than 75%; weak justification: • Employment land need (not accepted) (see part of response to Chapter 9) • Expansion predicted for the EZ (but based around high-technology industries which typically produce low-volume employment opportunities) • Elevation of Warton from Local Centre to Key Service Centre; but preface acknowledges Warton as a village, strategic objectives include retaining identity, character and setting of the rural village. Therefore unable to support.	Not specified	The Publication Version Local Plan has reduced the number of homes proposed for Warton from 1160 in the Preferred Option to 840. In both documents, Warton is a Local Service Centre - no change.
Story Homes Ltd	Barton Willmore	No	No	No	Site HSS2: granted at appeal for 360 dwellings, but unrealistic delivery assumptions: applicant is strategic land company, will need to dispose of site to a housebuilder, then will need reserved matters approval: unlikely to start until 2019, may not be fully delivered in plan period. HS27 Oaklands Caravan Park: not allocated at RPO stage; now pending application for 53 homes, but LCC objection on highway grounds Deliverability of other sites in Warton not contested.	Revise trajectory Remove until highway issues resolved.	An application for the reserved matter of access was received in August and is pending consideration. The Council considers the trajectory reasonable - no change. The Council's Development Management Committee have resolved to approve the application subject to the signing of a Section 106 agreement - no change Noted.

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Anthony Guest		No	Not specified	No	The selection of Warton as an SLD is unsound and possibly illegal. Consultation on Preferred Option where Warton first identified as strategic location unsound as Preferred Option bore little relation to previous options presented (at Issues and Options stage) and failed to take account of responses; no alternative SLDs proposed, no justification for selection of Warton. Production of Masterplans not progressed by Council, Council failed to contest grant of planning permission. Impact of development in Warton set against paucity of infrastructure represents abnegation of planning process. Para 6.19 says that Warton will become more sustainable over lifetime of plan: acknowledges current unsuitability of location.	Delete Policy SL3	From the Preferred Option consultation forwards, the Plan has proposed four strategic locations, of which Warton is but one. In response to the Preferred Options consultation, the number of homes at Warton was reduced from 1,160 to 650; the current figure of 840 results from a subsequent appeal decision. Warton is a nationally significant employment location, and failure to identify it as a strategic location would have represented an unsound choice. Infrastructure delivery over the plan period is set out in the Infrastructure Delivery Plan. Measures to create a local centre in Warton will be implemented during the plan period.
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	Warton: settlement of 3,600, adjacent to Freckleton (combined total 9,500); home to BAE site including EZ; also Land Registry as major employer; services include 2 Primary Schools, 2 day nurseries, 2 Churches, Village Hall, Scout Hut, 2 Public Houses, Social Club, Bridges Playing Fields, Play Area, BAE Sports and Social Club, Tesco/ Subway and parade of shops on Lytham Road, Coop Harbour Lane, Petrol Station; also medical surgery, dentist, more shops and services in Freckleton. Object to the housing requirement and extent of allocations within Warton Strategic Location.		Comment noted: Warton has facilities appropriate to its Local Service Centre designation, although additional services and infrastructure will be required during the Plan period.

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					Wording of SL3 not NPPF compliant 840 figure should be increased to reflect total required supply figure (should be 11,088 – 11,340) and to align with proportion of development in Preferred Option (17%): gives 1,885 – 1,928. Housing number in Warton reduced from 1,160 to 650 in RPO, then 840 in current plan; requirement of 650 in NDP; but no local needs assessment to support NDP, no evidence that higher figure could not be achieved; the SA of the NDP did not include alternative options; Fylde have produced no SA or evidence to support lowering to 650, noted by inspector at Blackfield End Farm inquiry; NDP allocated two large areas within which remainder of the 650 homes without permission were to go, one to the west (including client's sites) and one to east; at examination recommendation was to proceed with all housing policies including allocations struck out, on grounds that SEA requirements not met rather than suitability of sites. Policy SL3 does not allocate additional land, just reflects consents; the number delivered by these will be less than 800; plan does not include full extents of allocations proposed as part of NDP; Fylde Council have withdrawn objections to Clifton House Farm and Land off Lytham Road schemes before public inquiry on 12th July and accepted that development acceptable in principle, confirmed by statement of common ground. Findings of earlier SA of Preferred Option 2013 still relevant, confirming that Warton	Should state "a minimum number of " or "at least" xxx homes Provide land in Warton for 1,088 – 1,045 additional dwellings over plan allocation.	Not required: the development strategy as a whole provides the necessary flexibility - no change. The quantum of housing suggested for Warton is wholly undeliverable given the constraints of local infrastructure, particularly highways. The number put forward in the plan reflects what is achievable, and what is appropriate for a Local Service Centre - no change.

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					could accommodate at least the 1,160 in that version; appeal schemes would take consented total to 1,300, no reason why target could not be increased further.. Increased numbers elsewhere have resulted from lowering at Warton, but optimistic delivery targets e.g. Whyndyke (complex mixed use development with only recent outline consent), Queensway (930 units between 2016 and 2032, equivalent to 58pa, but no completions yet, site likely to be in 4 phases, uncertainty about future of developer). Larger proportion of development should be accommodated at Warton; developments to north and west could be combined to produce detailed masterplan, including a complete link road from SW to N.	Reduce numbers expected at Whyndyke in plan period to 500. Reduce numbers at Queensway in plan period to 450.	Expected delivery rates are realistic - no change. Noted: policy M1 requires any development in the strategic locations to adopt a masterplanning approach.
Policy SL4 Kirkham and Wesham Strategic Location for Development							
Minority Group – Liz Oades		Not specified	Not specified	Not specified	Propose that Option SL4, land to the west of Kirkham and Wesham should be removed from the Preferred Option document as a strategic site; do not believe that the case for the employment land has been made; housing numbers can be accommodated on brown field sites in Kirkham, which have not been properly explored, so to use open countryside is quite obviously wrong. Reference to "edge of settlements" wrong: outside the settlement boundary; settlement boundary at Kirkham and Wesham is the by-pass, a hard edge which is the strongest boundary to protect, if this settlement boundary is breached then every settlement in this Borough is at risk.	None specified	Policy SL4 relates to all sites in the Kirkham and Wesham Strategic Location: of the two sites to the west, site MUS3 has planning permission and is partly developed, and a substantial part of site HSS9 has planning permission, with some completed. The supply of brownfield land in the borough is wholly insufficient for the housing needed. To regard settlement boundaries as limits outside which development can never occur would be contrary to the Framework.

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					Infrastructure for waste water and electricity extremely limited; much of vicinity subject to flooding; cost of infrastructure too great for number of houses so will be just phase 1 and additional housing would be difficult to defend once settlement boundary breached. Development would cause loss of farmland from food production, stress on crowded schools, doctors, dentists, would use playing fields for housing, have no connectivity with Kirkham and Wesham, no sustainability, poor access/egress, not possible to provide within plan period.		Housing is being delivered on site HSS9, with infrastructure satisfactorily provided for. The existing playing fields are not included within allocations.
Kirkham Grammar School	Steven Abbott Associates	Yes	Yes	No	Governors have consistently promoted off-site playing fields as residential allocation since August 2012; replacement playing fields of quantitative and qualitative equivalent or better standard would be provided in local area; all other sites in Kirkham triangle now have permission, fields will have housing to west, north and east, will be subject to unauthorised access by new residents; playing fields were previously allocated for development in earlier versions of plan, now de-allocated at meeting of 9th March 2016. Therefore object to plan as: • Not positively prepared , by failing to allocate, fails to maximise use of Kirkham Triangle site, fails to deliver superior replacement playing fields; • Not justified, as plan not the most appropriate strategy as fails to use sustainable site, requires use of other, less sustainable sites;	Allocate the off-site playing fields for housing, with replacement facilities to be identified and provided within an agreed timescale.	The site was not allocated at the Revised Preferred Option stage. There is no indication of how or where suitable replacement facilities could be delivered. Loss of the playing fields would therefore be contrary to the Framework - no change.

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					• Not effective: non allocation of playing fields site results in fewer deliverable sites, doubts over deliverability of plan • Not consistent with national policy: replacement superior playing fields would be sustainable form of development; failure to allocate means not sustainable.		
Story Homes Ltd.	Barton Willmore	No	No	No	Concerns over assumptions on delivery of sites. HSS10 Willowfields: questions whether all dwellings delivered within plan period, or whether some were before. HS28 Sunnybank Mill: to deliver 31 dwellings within plan period, yet no planning permission, currently unavailable as still in commercial use.	Remove homes completed before plan period from supply. Remove site from supply unless further evidence of availability provided.	Those completed prior to the plan period are not included in the Trajectory. The council's Housing Land Availability Schedules published annually show the position each year. The site remains likely to come forward - no change.
Taylor Wimpey	Cushman & Wakefield	No	No	No	Client has option on 78 acre site Land at Weeton Road Kirkham Endorses approach to development strategy, identification of Kirkham as Key Service Centre at top of settlement hierarchy Land at Weeton Rd Kirkham is suitable, sustainable, deliverable, could deliver 650-750 new homes; no significant technical restrictions therefore could commence delivery during 0-5 years. Located S and W of Mill Farm development (under construction: 6,000 capacity stadium, food store, hotel, petrol station and retail shops, bar and restaurant within stadium); Mill	Land at Weeton Road, Kirkham being brought forward as an allocation for housing development to directly assist the Council in demonstrating they have a deliverable and developable supply of housing land, which in turn will assist in demonstrating the soundness of the Local Plan	This site would represent a major additional strategic site, outside existing settlement boundary, separated from the settlement by the main A585 which acts as a barrier between the existing settlement and the site, and with significant visual impact; it is therefore not considered to be a sustainable site. There are sufficient sites within the plan to provide for the housing requirement - no change.

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					Farm could be considered start of sustainable urban extension to Kirkham and Wesham, land at Weeton Road to be next phase. Visual appraisal showed that views from site restricted by existing vegetation on boundaries, large structures at Mill Farm; potential to offer transitional gateway to Wesham from west; junctions in vicinity of site have sufficient capacity; will encourage sustainable travel, 13 mins walk to Kirkham & Wesham railway station (services to Manchester, Liverpool, Preston and Blackpool, NR commitment to electrification). Council assessed site in Strategic Site Assessment, scored more highly than other sites which were included; site was dismissed only due to lack of developer interest at the time; with client's interest this obstacle now removed, therefore site could be brought forward, provide immediate boost to meeting requirement.		
Metacre Ltd.	De Pol Associates	Not specified	Not specified	No	Additional land needed in order for plan to be found sound; Kirkham and Wesham identified as strategic location: plan acknowledges as suitable to accommodate significant housing growth; considered that SL4 needs to identify additional land in Kirkham and Wesham. Land to the east of Fleetwood Road / north of Sanderling Way, Wesham is suitable site; limited land available within settlements, therefore greenfield land necessary to accommodate housing requirements; outline application to be submitted imminently for 68 homes; site is highly	Land to east of Fleetwood Road / north of Sanderling Way, Wesham is identified as a housing allocation in Policy SL4 and the accompanying Policies Map	The Plan allocates sufficient sites to provide for the housing requirement. Additional sites are not required - no change.

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					accessible to local services and facilities, within 400m of public transport provision, a primary school and children's play facilities; within 400m of the adjacent Mill Farm Sports Village (will comprise range of employment, leisure, recreational and retail facilities); access possible off Sanderling Way (no land ownership issues); not best and most versatile agricultural land.		
Hollins Strategic Land LLP		No	No	No	Kirkham and Wesham identified as strategic location from Preferred Options onwards (2013); Land off Dowbridge was allocated for housing (240 dwellings); summarised as N of Dowbridge, SE end of Kirkham; agricultural land/farm; approx. one third in flood zone 2; field pond on site. Responses report in July 2014 recommended deleting site as developable part of site lay away from the settlement, with flood risk zone in between. Application made for 170 dwellings: appealed against non-determination, contested by council, hearing on 23/11/2016; should be allowed, acknowledged that council will contest. Application for 95 dwellings, council resolved to approve 27/7/2016; decision expected following S106; site should be allocated.	If appeal allowed, Dowbridge site for 170 should be allocated. Site for 95 at Dowbridge should be allocated as has resolution to grant permission	The scheme for 95 homes is now an allocation, to be listed as "minded to approve" in the Trajectory. **MODIFICATION no MNR009** The Council views development of the remainder of the site unsustainable on the grounds of its scale and harmful visual impact on the landscape character and the setting of Kirkham.
The Rigby Group	PWA Planning	Not specified	Not specified	No	Plan fails to identify sufficient well-located, accessible and immediately available employment sites to serve Kirkham/Wesham; Corner Hall Farm site at SW of Jn 3 of M55 could provide; sustainably located (close to one of principal settlements of borough); encompasses existing hotel; use for	Policy SL4 should be amended to include additional commercial / employment land allocations, and in particular that the land identified edged in red on the attached plan at Corner Hall Farm should be identified for	The suggested site is away from the settlements and therefore not sustainably located. The council has provided sufficient employment line in accordance with the development strategy - no change.

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					employment, commercial (e.g. high-tech business) or specialist retail would have positive impact on area; council state that site is isolated, but Mill Farm to the south considered to be a sustainable location; identification of Universal Products in between as "large developed site in the countryside" means linear progression, shows Corner Hall Farm not isolated; vast majority (82.5%) of employment land located at Fylde-Blackpool Periphery, but unacceptable concentration; more reasonable apportionment would give 8-10ha for Kirkham/Wesham, but plan has only 1.1 ha at Mill Farm; Corner Hall Farm site would be attractive to the market. Fylde Employment Land and Premises Study recognised that important for Fylde to have balanced portfolio of employment land spatially as well as size and type; Framework requires councils to plan proactively to meet needs of business, therefore plan not positively prepared, unsound.	economic development purposes. (ii) The boundary of the Kirkham and Wesham SLD should be altered to include land at Corner Hall Farm as well as the intervening land which is largely in economic development use. Consequential amendments should be made to the Proposals Map.	
Mr and Mrs Matthews	Steven Abbott Associates	Yes	Yes	No	Welcome the identification of the land as a housing site but would request that the site boundary is extended up to Blackpool Road (as illustrated on the enclosed plan) as the northern part of site also benefits from planning permission. It is our view that the plan has not been positively prepared because the Council has failed to make the most effective use of the land in question.	Inclusion of land to site boundary on Blackpool Road	The land is shown as an allocation for residential park homes as minded to approve, appropriate to the situation and surroundings. No consideration of any issues regarding the suitability of the northern part of the site for the same have taken place, no permission is in place. No change
Policy SL5 Development Sites Outside the Strategic Locations for Development							
Story Homes Ltd.	Barton Willmore	No	No	No	Wrea Green: council is reliant on commitments for 234 dwellings, including clients' site Land at Willow Drive: this site	Remove 14 units from supply to reflect	Noted: this reserved matters application was approved in October 2016 for 86 homes which is the whole

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					had outline for 100, but reserved matters is for 86. Allocation supported		site. Update of policy and trajectory required. **MODIFICATION no MNR010**
					Object to downgrading of Elswick to Tier 2 Smaller Rural Settlement (dealt with under Chapter 6); therefore object to reduction from 140 to 50 dwellings: council has produced no clear evidence that village cannot accommodate more than 50; cap to development inconsistent with NPPF; Clifton is at same tier yet has lower accessibility score, yet still 104 homes allocated, provides justification for Elswick having more dwellings.		Development of 50 homes is an appropriate quantum of development for villages with this level of service provision. The development strategy concentrates development in the more sustainable locations. Larger amounts of development would not be appropriate given the limited services available - no change.
					Allocation through NDP is inappropriate as no draft planning document produced, leaves uncertainty, need for immediate remediation of 5-year supply shortfall	Recommend that the Council looks to allocate sites as part of the Local Plan process to ensure there is a mechanism to deliver housing in Elswick, should the Neighbourhood Plan not come forward.	The Council recognises the intention of Elswick Parish Council to produce a Neighbourhood Development Plan; the Council does not wish to interfere with the process by making allocations in the Local Plan - no change.
					Client has interest in Land North of Mill Lane, Elswick; 4.7 ha on E edge of village; Site Assessment Background Paper (2016) considered "potentially suitable"; immediately available for development, ownership of single willing landowner; no current use requiring relocation; adjacent to existing urban area of Elswick; identified as sustainable settlement for growth in Local Plan; no landscape or heritage designations affecting site; local services include convenience store, 2 x public houses, church, community centre, takeaway, tennis courts and a bowling green; 1.9 km from centre of Gt Eccleston (general store, post office, hairdressers, health services and a primary school (Great Eccleston Copp C of E School), located on	The site Land North of Mill Lane, Elswick should be allocated in the plan	Elswick is not an "urban area", it is a rural settlement. Sites in Elswick will be selected through the neighbourhood planning process.

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					Copp Lane, 1.2km from site; bus stops 190m and 350m from centre of site; buses 75A, 76 and 80, providing services to Preston, Blackpool, Fleetwood, Poulton-le-Fylde, Lytham St. Annes and Great Eccleston; 6 different school buses. Outline application for 100 dwellings submitted March 2016, decision expected November 2016, supported by ecological appraisal, LVIA, TA, ground investigation, FRA, tree survey; no statutory consultee objections; no physical constraints to development; would deliver in short term if permitted.		Application remains pending consideration.
John Coxon	Smith & Love Planning Consultants	Yes	Yes	No	Unclear why Clifton has allocation of 104 homes whilst Elswick, with higher overall score, will provide just 50 homes through NDP; neighbourhood plan can take up to 5 years to reach adoption and the council's need for housing is pressing; fully assessed allocations have more chance of being delivered. Opportunity to secure housing allocation at Land North of Beech Road should not be overlooked, more certain delivery than neighbourhood plan. There is scoring error in relation to Elswick in Settlement Hierarchy Background Paper, regarding bus service: more destinations served than stated, therefore should receive more points.	None specified	One of the two sites in Clifton has planning permission, the council resolved to approve the second in 2015 subject to a section 106 agreement. The allocation of 50 homes remains an appropriate strategy for Tier 2 Smaller Rural Settlements, within the wider development strategy. Sites in Elswick will be selected through the neighbourhood planning process. A number of bus services (and indeed other services) have altered since the assessment was undertaken. Rescoring in response to one particular change would not be appropriate.
Mr. D Haythornthwaite	PWA Planning	Not specified	Not specified	No	Failure to make specific land allocations in Wrea Green inappropriate given its scale and significance; only approved sites	(i) Policy SL5 should be amended to include additional land use	The number of 100-150 is an appropriate level of housing in accordance with the development

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					allocated, but likely to be completed before 2020, will leave 10-15 years with no development planned for the settlement; no reasons that land could not be provided in sustainable edge-of-settlement locations; no obvious justification for figure of 100-150 dwellings, not reflective of needs of settlement over plan period. Land North of Ribby Road should be allocated: site on periphery of settlement, close to facilities, well located for wider highway and transport network;	allocations, specifically for residential development, on the periphery of Wrea Green. (ii) Paragraph 7.21 should be amended to remove the arbitrary limit of 150 dwellings as being the apparent capacity of Tier 1 settlements. (iii) The area of land north of Ribby Road, identified edged in red on the plan attached to this representation, should be included as a housing allocation within Policy SL5 and consequential amendments should be made to the proposals map.	strategy, for a settlement of this size and services available. Development will be concentrated in the strategic locations, these being the most sustainable. Additional sites at Wrea Green are not required, and would result in a disproportionate amount of development for the services available - no change.
Jones Homes	De Pol Associates	Not specified	Not specified	No	Plan relies on minimum of 998 dwellings through windfall sites; developments in SL5 do not add up to the 100-150 envisaged for Tier 1 Larger Rural Settlements; therefore, additional windfalls required at these settlements; but plan does not have 5-year supply, therefore need to allocate additional sites rather than rely on windfalls in order to be sound. Therefore Policy SP5 should allocate additional sites: suitable site is Land South of Cambridge Close Staining; adjoins existing settlement and existing committed development nearing completion; limited opportunities within settlement boundary therefore greenfield allocation essential; access can be provided off Cambridge Close, which can also provide direct pedestrian links to the range of facilities and services within the village centre; site is suitable, available and deliverable.	Requested that Land South of Cambridge Close Staining is allocated for housing development and identified as a non-strategic allocation in Policy SL5 and the accompanying Policies Map.	This site has not been considered at previous stages of plan preparation and has not been submitted or considered as a SHLAA site. Staining has sites for 99 homes in the plan period. Sufficient sites are included in the plan to provide for the housing requirement - no change.

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Britmax Developments	Indigo Planning Ltd	Yes	Not specified	No	Policy SL5 is unsound as not positively prepared, does not represent a justified strategy for the location of new development. Great Birchwood site has been overlooked: previously developed land, has number of residential dwellings on the site; sustainably located offering easy access to both Warton and Lytham.	Great Birchwood site should be identified as a development location.	The site lies in the green belt between Warton and Lytham. It is an existing leisure/tourism use, and would be suitable for redevelopment as a high quality leisure/tourism facility in such a way that would not cause harm to the green belt. Describing it as a development site in the Local Plan would not be appropriate as it would imply that harm to the green belt is acceptable.
Mr & Mrs McSorley	Smith & Love Planning Consultants	Not specified	Not specified	No	Clients own W portion of site HS52, also rectangular area of 2.1 acres to S of propose allocation, to rear of their property; consider that this additional land should be included as extension to the allocation, to form larger and more beneficial opportunity for housing in Newton. Newton is Tier 1 Larger Rural Settlement, sustainable location for growth, has physical and social infrastructure to support modest additional housing; acknowledged market interest; clients are committed to making land immediately available, to be developed in years 5-9 of plan period. Unclear why the additional land was excluded. Original larger site extended to Blackpool Road, but was scaled back to line of double hedgerow marking northern boundary of allocated site to prevent erosion of Area of Separation; further promotion of area to the north was rejected in Site assessment Background Paper as fell within Area of Separation; proposed extended site lies south of	An enlarged housing allocation incorporating the full extent of land within their ownership, is included on the draft Policies Map; reference to a larger number of dwellings (total 35 suggested rather than 29).	Accepted: requires adjusted site boundary on Policies Map, change to a total of 54 units **MODIFICATION no MNR011**

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					proposed allocation, will not adversely affect Area of Separation. Land consists of paddock, menege and timber stable, council may have presumed not available when drafted site allocation boundary; but land is available and stable and menege are unused and surplus to requirements, not proposed to re-erect elsewhere. Development of allocation would result in this land becoming contained; would sterilise surplus land, would no longer serve any landscape/visual benefit; allocation would be logical rounding off.		
Carrington Group	Johnson Mowat	Not specified	Not specified	Not specified	Interest in Land Off Mains Lane, Poulton-le-Fylde; delivery of key arterial route likely to provide growth opportunities off Mains Lane; Option 1 of HE proposals can be safeguarded providing 100 dwellings on western edge of site, infill of 10 dwellings to east; location broadly supported by HBF; would in no way prejudice delivery of route; sustainable location (bus stops along A585 Mains Lane, Poulton railway station); can be brought forward in short term and designed that bypass incorporated at later date; not Green Belt.	None specified	The site has poor access to Poulton-le-Fylde; access cannot be achieved; much of the site is in flood zone 3; allocation of the site could prejudice the Windy Harbour to Skippool Improvements scheme; the site could have major visual impact. Sufficient and preferable sites are allocated within the plan - no change.
Mr A Bradshaw	Emery Planning	Yes	Yes	No	Client's site: Land East of Bryning Lane, Wrea Green: at edge of Wrea Green, presently agricultural; logical rounding-off opportunity for village; locationally sustainable, easy walking distance of primary school, shops, places of worship, sporting venues, public houses; 3 buses an hour to destinations such as Preston City Centre, Blackpool, Kirkham; in flood zone 1; opportunity to address unmet housing	None specified	Sufficient sites are allocated in the plan to provide for the housing requirement. Sufficient sites have been provided in the rural settlement of Wrea Green to provide for an amount of housing commensurate with the services available. The development strategy concentrates development in the most sustainable locations - no change.

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					needs; highly sustainable site with very limited environmental harm far outweighed by social and economic benefits.		
Keith Halliwell	JWPC Ltd.	Yes	Not specified	No	Object to change of Elswick from Tier 1 to Tier 2 settlement above, therefore also object to SL5, quantum of 50 through neighbourhood plan; unclear how amount of development for the village has been derived, whether sufficient justification given to amount of each development relevant to the settlements. Policy GD1 applies settlement boundaries, then modified by allocations through Policy SL5; but need for Elswick to grow through plan period, specifically to north, to accommodate development closest to the primary school, providing development in the more sustainable part of village; tightly drawn settlement boundary has potential to conflict with proposals for 50 dwellings.	Request extension to Elswick settlement boundary, specifically to north, to include client's site	Considered under Chapter 6 responses Unclear what this means. Sites in Elswick will be allocated through the neighbourhood planning process, which would redraw settlement boundaries accordingly.
Metacre Ltd	De Pol Associates	Not specified	Not specified	No	Plan depends on 998 dwellings coming forward as windfalls, must be minimum; Tier 1 and Tier 2 Rural Settlements to accommodate up to 100/150 and 50 homes respectively; whilst Policy SL5 identifies range of sites, these do not total the indicative thresholds for the settlements, therefore additional windfalls required: example is Weeton, only 20 allocated, of which 16 are completed, therefore plan acknowledges could accept additional windfall allowance. However, as no 5-year housing supply, to make plan sound, additional land needs to be allocated; furthermore planned delivery	Requested that the land to the west of Church Road, Weeton is allocated for housing development and identified as a non-strategic allocation in Policy SL5 and the accompanying Policies Map.	This site has not been considered at previous stages of plan preparation and has not been submitted or considered as a SHLAA site. Weeton has sites for 20 homes in the plan period. Sufficient sites are included in the plan to provide for the housing requirement - no change.

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					of 370 homes pa insufficient; therefore SP5 needs to identify additional land. Site at Church Road Weeton: 1.7 ha, immediately adjacent settlement boundary; limited opportunities within settlement boundary; necessary to allocate greenfield land; imminent outline application for up to 25 dwellings; including 30% affordable housing; public footway on eastern boundary provides links to village centre; as well as school and church to south of site; can provide access with appropriate visibility splays; range of technical surveys completed confirm any impacts can be mitigated; suitable, available and deliverable.		
Hollins Strategic Land LLP		No	No	No	Land off Woodlands Close Newton: located within Area of Separation under Policy GD3; would not compromise Area of Separation, at narrowest site is 983m from Kirkham, at SW corner 1195m; land allocated for development at Oak Lane is closer to Kirkham than 1195m. Background paper states that development pressure W of Newton, but there isn't E or S of Kirkham: Green Belt area to S, fields separate Kirkham from A583, closest built development to Kirkham 395m from N side of the A583 and 485m from S side: therefore green gap sufficient to prevent Kirkham and ribbon from merging; majority of built development on S side of A583 is agricultural which further increases sense of separation; application site well contained within landscape; development will have well-defined boundaries; views towards development will be from adjacent roads, few glimpses along Parrox	Land off Woodlands Close, Newton with Scales should be listed as a housing site in Policy SL5, site should not be included within an AoS.	The site lies in an Area of Separation - no change.

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					Lane, but no inter-visibility of Kirkham and Newton in glimpses; people travelling along road will still experience sense of leaving one settlement before entering another due to visual containment of new housing Benefits of housing: sustainable; jobs in construction; no severe highway impacts; contribution to reducing severe housing deficit; all 50 dwellings could be delivered within next 3 years; provision of up to 15 affordable homes; good design; on-site POS. Newton one of three Tier 1 settlements, for 100-150 homes but only 115 allocated, no applications yet on those sites suggest deliverability issues.		
Wainhomes	Emery Planning	Yes	Yes	No	Client's site Land to West of Bryning Lane, Wrea Green: logical infill/rounding off opportunity, enclosed by development to N, E and S; no trees; outside Conservation Area. Site was allocated in 1994 Fylde Local Plan, application in 1999 for 60 dwellings, officers recommended approval, committee resolved to refuse on basis of highway safety against officer advice; Redrow appealed, but appeal withdrawn by Redrow and site not carried forward by officers because landowner was unwilling to sell, therefore not developable. Site now actively promoted by landowner; site is suitable, available, achievable in short term; option agreement to bring forward for housing in the short term; scheme for 38 homes being prepared;	Allocate site Land to West of Bryning Lane, Wrea Green for housing.	Sufficient sites are allocated in the plan to provide for the housing requirement. Sufficient sites have been provided in the rural settlement of Wrea Green to provide for an amount of housing commensurate with the services available. The development strategy concentrates development in the most sustainable locations - no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					views into site would be localised or screened; within easy walking distance to primary school, shops, places of worship, sporting venues and public houses; 3 buses an hour to e.g. Preston, Blackpool, Kirkham; vehicular access via existing access point, different from previously proposed access and fewer dwellings; within flood zone 1; no statutory ecology sites, few ecological features		
The Rigby Group	PWA Planning	Not specified	Not specified	No	Failure to make any housing allocations in Wrea Green is inappropriate, given scale and significance of settlement; acknowledged that Wrea Green performs function of larger rural settlement, it is the largest of these in the borough, could be argued that performs functions of local service centre. Council have only allocated sites that already have planning permission; likely to all be completed by 2020, therefore period of 10-15 years when no development planned; lack of alternative sites demonstrates failure of emerging local plan; no insurmountable reasons that additional land on settlement edge could not be provided. Site at West of Bryning Lane: on periphery of settlement, close to facilities, well-located for access to wider highways/transport network; development would represent appropriate rounding off of settlement; would not significantly impact on landscape; could deliver sustainable development.	The area of land west of Bryning Lane should be included as a housing allocation within Policy SL5 and consequential amendments should be made to the Proposals Map.	Sufficient sites are allocated in the plan to provide for the housing requirement. Sufficient sites have been provided in the rural settlement of Wrea Green to provide for an amount of housing commensurate with the services available. This site is distinct from the Wainhomes site noted above (which has been given a similar name by the respondent). This site is to the south of the village. The site has not been considered at previous stages of plan preparation and has not been submitted or considered as a SHLAA site. It would represent a significant extension of built form into the countryside area, and is not close to the services available within the village. It would not represent sustainable development. No change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 8: General Development Policies							
Historic England		Not specified	Not specified	No	**Cross Cutting Themes in Chapter 8** - only Strategic Objective 1 will be achieved through the policies in Chapter 8. If appropriate heritage protection is not secured through development encouraged by this section of the Local Plan it will not satisfy paragraph 8 of the Framework.	None specified	Comments noted, however, only Strategic Objective 1 is listed within the Cross Cutting Themes in Chapter 8.
Policy GD1 Settlement Boundaries							
Historic England		Not specified	Not specified	Not specified	Historic Parks and Gardens are identified as a possible constraint to development, it should be noted that other heritage assets might also be constraints.	Reference other heritage assets.	The policy as currently worded is considered appropriate – no change.
United Utilities		Not specified	Not specified	Not specified	Welcomes the inclusion of their previous comments at RPO stage within the justification.	None specified	Support welcomed
Mr M James	Steven Abbott Associates	Not specified	Not specified	Not specified	The text accompanying Policy GD1 indicates that strategic sites that are allocated have seen settlement boundaries amended to include them. As a result the whole of the Strategic Housing Site HSS2 is correctly identified as being within the Settlement Boundary of Warton, however this leaves Syke Hall as a very narrow strip still within the Green Belt boundary.	Syke Hall should be removed from the Green Belt and included within the proposed Warton Settlement Boundary.	The policy as currently worded is considered appropriate – no change.
Story Homes Ltd	Barton Willmore	No	No	No	Paragraph 8.1 of the Publication document states that where strategic and non – strategic sites are allocated adjacent to existing settlements, the settlement boundaries will be amended. Currently, there is no certainty that the proposed Strategic and Non-Strategic Locations within the Local Plan will be delivered. Consequently, imposing a restriction on Greenfield land on the edge of existing settlements will only serve to permanently	Policy should be amended to create enough flexibility to amend settlement boundaries where necessary to accommodate sustainable development opportunities coming forward where a need has been identified.	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					"shut the door" on Greenfield release for housing, exacerbating the housing problem in the borough.		
BAE Systems	Cass Associates	Yes	Yes	No	The north side of the Warton Aerodrome, which is an intensively developed area with significant infrastructure and built development and is within the Enterprise Zone, should be included within the settlement boundary of Warton. Policy GD1 "Settlement Boundaries" supports development of previously developed land within settlements subject to other relevant local plan policies being satisfied. Including the north side of the Aerodrome within the settlement boundary would ensure that any future development opportunities have this in principle policy support.	Amend the Policies Map to show the north side of Warton Aerodrome within the settlement boundaries of Warton.	The policy as currently worded is considered appropriate – no change. The Policies Map identifies areas of existing employment land, including the Enterprise Zones, therefore the Council does not consider that the Warton settlement boundary needs to be amended.
Greenhurst Investments LLP	Indigo Planning Ltd.	No	No	No	Policy should be amended to make reference to the fact that a NDP can alter settlement boundaries, as is the recommendation made by the Examiner of St Annes-on-the-Sea NDP.	None specified	The policy as currently worded is considered appropriate – no change. The Examiner for the St. Annes on the Sea Neighbourhood Development Plan (NDP), recommended a modification which extends the settlement boundary of St. Annes in order for the Plan to have "flexibility for development in the future". The NDP has not yet progressed to Referendum and this modification has yet to be accepted. The Council does not consider that the wording of the policy needs to be amended or changed as a result of this. A NDP is a separate document that comes under the umbrella of the Development Plan, so will be addressed as part of the NDP process.
Gladman Developments		Not specified	Not specified	Not specified	The use of tightly drawn settlement boundaries will only act to contain the	Recommend that a criteria based approach is applied	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					physical growth of the borough's settlements. This policy only allows development on previously developed land or greenfield sites within the proposed settlement boundaries. This position seems to conflict with Policy DLF1 which allows development within and adjacent to Tier 1 and Tier 2 Rural Settlements and does not make any specific reference to the prioritisation of previously development land.	that assesses the sustainability of sites on a case by case basis consistent with the presumption in favour of sustainable development.	
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	The settlement boundaries for Warton should be revised, particularly in respect to the Clifton House Farm landholding.	The settlement boundary for Warton is revised.	The policy as currently worded is considered appropriate – no change. Minor amendments have been made to amend settlement boundaries across the borough to include allocated and committed sites.
Metacre Ltd.	De Pol Associates Ltd.	Not specified	Not specified	No	The proposed new settlement boundaries in the publication plan have been amended to include allocated and committed housing sites. Potential for further windfall development within the proposed settlement boundaries will be limited and thus there is little flexibility to deliver the Borough's housing requirement. There is no justification to place additional restrictions on greenfield development. Policy also suggests that proposals will be limited to the settlement development targets. These targets are arbitrary figures and it is inappropriate to treat these as a ceiling to development.	The wording of policy GD1 should be deleted and replaced with: *The boundaries of settlements in Fylde are shown on the Policies Map. Development proposals on sites within or immediately abutting the existing settlements will be assessed against all relevant Local Plan policies, including, but not limited to, infrastructure, open and recreational space, the historic environment, nature conservation, mineral safeguarding, flood risk, as well as any land designations or allocations.*	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Metacre Ltd.	De Pol Associates Ltd.	Not specified	Not specified	No	In paragraph 8.3 – reference to BMV agricultural land should be deleted in favour of NPPF paragraph 112. Together with reference to limiting development to settlements and greater restrictions on greenfield development over previously developed land.	None specified	The justification text as currently worded is considered appropriate – no change.
Oyston Estates	Cassidy & Ashton Group Ltd.	Yes	Yes	No	The settlement boundaries should be revised to incorporate land at North Houses Lane which should be allocated for development. This approach is supported by the Examiner into the St Annes Neighbourhood Plan who recommended incorporating that area of the land within that Plan area into the settlement boundary.	The settlement boundary of St. Annes be amended.	The policy as currently worded is considered appropriate – no change. The Examiner for the St. Annes on the Sea Neighbourhood Development Plan (NDP), recommended a modification which extends the settlement boundary of St. Annes in order for the Plan to have "flexibility for development in the future". The NDP has not yet progressed to Referendum and this modification has yet to be accepted. The Council does not consider that the wording of the policy needs to be amended or changed as a result of this. A NDP is a separate document that comes under the umbrella of the Development Plan, so will be addressed as part of the NDP process.
Hollins Strategic Land LLP		No	No	No	Policy states that development will be focussed on previously developed sites. NPPF does not prioritise PDL in this way; rather, it seeks development to be in the most sustainable locations. This policy also encourages the development of PDL sites which adjoin settlement boundaries, it should encourage sustainable sites which adjoin the boundaries and not prioritise PDL.	The final paragraph of the policy relates to MBV agricultural land. It is considered that Policy GD1 should not refer to BMV and that this should be referred to in a separate policy.	The policy as currently worded is considered appropriate – no change.

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Ideal Corporate Solutions Ltd.	Emery Planning Partnership	Yes	Yes	No	Concerned that their clients site (Valentine's Kennels) is currently designated as countryside. Following the decision by the Examiner of the St. Annes on the Sea Neighbourhood Development Plan to extend the boundary, clarification is needed to make it more clear as to which plan is defining settlements boundaries, the Local Plan or the Neighbourhood Plan.	The settlement boundary of St. Annes be amended.	The policy as currently worded is considered appropriate – no change. The Examiner for the St. Annes on the Sea Neighbourhood Development Plan (NDP), recommended a modification which extends the settlement boundary of St. Annes in order for the Plan to have "flexibility for development in the future". The NDP has not yet progressed to Referendum and this modification has yet to be accepted. The Council does not consider that the wording of the policy needs to be amended or changed as a result of this. A NDP is a separate document that comes under the umbrella of the Development Plan, so will be addressed as part of the NDP process.
Mactaggart & Mickel	Colliers International	No	Yes	No	Settlement boundary needs to be amended to include land in their ownership.	Remove clients land from the countryside.	The policy as currently worded is considered appropriate – no change.
Mr & Mrs Sorley	Smith Love Planning Consultants	Not specified	Not specified	No	Land in their ownership is currently outside the settlement boundary and as it is rear gardens, it is clearly previously development land and not countryside, and their ancillary, domestic small paddock, stable and unused sand ménage. Its exclusion would create an unnecessary and unjustified narrow finger of 'quasi' countryside extending into the settlement area. This would not serve any useful purpose as countryside and its protection serves no beneficial landscape, visual, biodiversity, heritage or other reasonable planning purpose in the public interest.	Revise the settlement boundary of Newton to include the land in the ownership of Mr and Mrs McSorley's.	The policy as currently worded is considered appropriate – no change. Minor amendments have been made to amend settlement boundaries across the borough to include allocated and committed sites.

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Policy GD2 Green Belt							
Mr M James	Steven Abbott Associates	Not specified	Not specified	Not specified	As the whole of the Strategic Housing Site HSS2 is correctly identified as being within the Settlement Boundary of Warton, this leaves Syke Hall as a very narrow strip still within the Green Belt boundary.	Syke Hall should be removed from the Green Belt and included within the proposed Warton Settlement Boundary.	The policy as currently worded is considered appropriate – no change. The development on site HSS2 is planned such that the area of the site within the Green Belt would remain undeveloped. It will therefore continue to fulfil the aims of Green Belt land - no change. Anomalous finger of Green Belt land would only occur if the Green Belt boundary were moved, but as stated above, this is not appropriate.
Anthony Guest		Not specified	Not specified	No	Failure to review the Green Belt policy is unsound due to the continued development of the borough and in particular the introduction of SLDs. Green Belt designation has prevented Freckleton from expanding.	Review of Green Belt designation.	The policy as currently worded is considered appropriate – no change.
Policy GD3 Areas of Separation							
CPRE – Fylde District		Not specified	Not specified	Not specified	Additional Areas of Separation are suggested to provide added protection of the countryside and protect BMV agricultural land and farming operations and the preservation of the distinctiveness and character of semi-rural settlements.	Additional Areas should be defined.	The policy as currently worded is considered appropriate – no change. An Area of Separation Background Paper was published in 2014 which addresses these comments.
Home Builders Federation		Not specified	Not specified	No	The final sentence of the third paragraph is considered overly restrictive and unjustified. There has been no assessment of areas or properties to ascertain whether some development within existing curtilages may be acceptable	The following amendment is recommended; "*New homes will only be permitted within the curtilage of existing homes in the Area(s) of Separation where it can be demonstrated it will not impact upon the character and distinctiveness of individual settlements".*	To remove or enable certain areas within the AOS future potential development, only contradicts the primary function of an Area of Separation – no change.

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Minority Group - Liz Oades		Not specified	Not specified	Not specified	The policy should be extended and be used in other areas of the borough to ensure separation of settlements.	Policy should be used in other areas of the borough.	The policy as currently worded is considered appropriate – no change. An Area of Separation Background Paper was published in 2014 which addresses these comments.
Hollins Strategic Land		No	No	No	The policy is overly restrictive and is more akin to Green Belt policy. The policy restrictions must be scaled back, to enable appropriate development to come forward.	None specified	The policy as currently worded is considered appropriate – no change.
Gladman Developments		Not specified	Not specified	Not specified	New development can often be located in countryside gaps without leading to the physical or visual merging of settlements, eroding the sense of separation between them or resulting in the loss of openness and character. Question the purpose of a gap designation, particularly if this would prevent the development of otherwise sustainable and deliverable sites coming forward to meet the borough's needs. This particular policy seeks to implement a blanket designation in these particular areas of the open countryside as a back door way to try and achieve what would amount to a new area of Green Belt by another name.	None specified	The policy as currently worded is considered appropriate – no change. If at Examination the Council are advised to allocate further land for residential development, there are more sustainable areas of land within the borough that can be identified rather than use land that the Council and the local community wish to see safeguarded.
De Pol Associates Ltd.		Not specified	Not specified	No	Object to the inclusion of land rear to 91-93 Ribby Road, Wrea Green within the AOS, as the site is entirely screened from public view. This land makes no contribution to the objectives of an AOS and planning consent has been approved on part of this site.	Land to the rear of 91-93 Ribby Road, Wrea Green be removed from the Area of Separation.	To remove or enable certain areas within the AOS for future potential development, only contradicts the primary function of an Area of Separation – therefore no change.
Mr. D. Haythornthwaite	PWA Planning	Not specified	Not specified	No	Object to the inclusion of land north of Ribby Road and to the east of Wray	Land north of Ribby Road and to the east of Wray Crescent,	To remove or enable certain areas within the AOS for future potential

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					Crescent, Wrea Green within the AOS, as the site includes the large expanse of farm buildings and does not preform the functions of an AOS as described by this policy. The land would be more appropriate as a housing allocation.	Wrea Green be removed from the Area of Separation.	development, only contradicts the primary function of an Area of Separation – therefore no change.
Anthony Guest		Not specified	Not specified	No	The AOS's appear to be a way of introducing new green belt without reviewing Green Belt policy. The planned AOS's have been justified by policy criteria developed after the fact and no objective assessment has been offered for selecting these areas as candidates for the status and not the many others proposed during consultation.	Needs an urgent review.	The policy as currently worded is considered appropriate – no change. An Area of Separation Background Paper was published in 2014 which addresses these comments and concerns.
Mr & Mrs Sorley	Smith Love Planning Consultants	Not specified	Not specified	Yes	Fully support the creation of an Area of Separation between Kirkham and Newton in order to preserve the character and distinctiveness of Newton.	None specified	Support noted
Neil Fox	Matthew Wyatt	Not specified	Not specified	Not specified	Fully supports the policy and the Council's aims to protect the openness between Kirkham and Newton	None specified	Support noted
Policy GD4 Development in the Countryside							
NFU		Not specified	Not specified	Not specified	The NFU is supportive of Policy GD4	None specified	Support noted
St. Annes Town Council		Not specified	Not specified	Not specified	Support Policy GD4 especially in relation to the designation of land to the east side of Wildings Lane, St. Annes (known as H2 site). This land should be protected.	None specified	Support noted
Warton East Developments	Satnam Planning.	Not specified	Not specified	No	It is nonsense to have land (east of Warton) that is clearly suitable for development in principle within the countryside.	Policy notation be removed from the site so that Policy GD4 does not apply.	The policy as currently worded is considered appropriate – no change. Minor amendments have been made to amend settlement boundaries

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							across the borough to include allocated and committed land.
Story Homes Ltd.	Barton Willmore	No	No	No	Policy seeks to restrict development in the 'Open Countryside'; however, the protection of the countryside needs to be balanced against the need to release land in order to deliver new housing development around the most sustainable settlements for growth. Policy GD4 as drafted does not afford any opportunity for residential development within designated areas of 'Open Countryside', with the exception of isolated new homes, this restrictive approach, will mean the council will not be able to meet its market and affordable housing needs for the Borough. For settlements such as Elswick, if the Neighbourhood Plan does not materialise this policy will effectively prevent housing needs being met.	The policy should be amended to allow for (and recognise) the need for the release of land in the "Open Countryside" for new sustainable development.	An unrestricted policy would lead to sporadic forms of developments appearing throughout the countryside and as such the countryside needs to be protected for its own sake.
Britmax Developments	Indigo Planning Ltd.	Yes	Not specified	No	Reference should be made in this policy to allowing the redevelopment of brownfield sites in countryside and green belt locations. Such sites can make a contribution to meeting future development needs.	None specified	The policy as currently worded is considered appropriate – no change.
Mactaggart & Mickel	Colliers International	No	Yes	No	Boundary needs to be amended to remove land in their ownership from the countryside.	Remove clients land from the countryside.	The policy as currently worded is considered appropriate – no change. Minor amendments have been made to amend settlement boundaries across the borough to include allocated and committed land.
Gladman Development		Not specified	Not specified	Not specified	It is unclear whether land beyond the settlement limits are classed as countryside. If this is the case, then this policy would be in conflict with DFL1. This	None specified	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					policy only allows for development should it be needed to support the purposes of a rural enterprise, redevelopment of existing buildings or minor extensions. Should development come forward in accordance with Policy H6 to support a rural enterprise, then this will likely have a condition attached to its use and will not generate any net dwellings to deliver market or affordable housing.		
Metacre Ltd.	De Pol Associates Ltd.	Not specified	Not specified	No	The Policy does not identify the re-development of pdl as an acceptable form of development in the countryside NPPF 89 identifies the redevelopment of pdl as an acceptable form of development in Green Belt, this should also be the case for the countryside. The Policy does not identify infill development as being acceptable in the countryside, even though this also identified as acceptable for Green Belt under NPPF policy 89. This is particularly relevant given settlements such as Treales are now being washed over by countryside.	The wording of policy GD4 should be amended to include the redevelopment of pdl, infill development, together with an allowance for development on the edge of settlements where needed to deliver housing requirements.	The policy as currently worded is considered appropriate – no change.
Policy GD5 Large Developed Sites in the Countryside							
Historic England		Not specified	Not specified	No	As drafted this policy implies that betterment would not be acceptable. In relation to the historic environment it is important for development to avoid harm to the significance of heritage assets, but to also allow for improvements to be made, for example in conservation areas. Paragraph 9 of the NPPF states that 'pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment'.	None specified	The policy does not allow proposed development to have a greater impact on the historic environment and the justification specifically states that any re-development of the site must respect the historic environment including potential undesignated archaeological assets. The Council therefore disagree with this objection as it does not preclude betterment - no change.

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United Utilities		Not specified	Not specified	Not specified	Supports the inclusion of their previous comments at RPO stage within the policy.	None specified	Support welcomed
Nuclear Decommissioning Authority	GVA	Not specified	Not specified	No	The Plan does not properly acknowledge the on-going decommissioning process at Springfields. It is expected that decommissioning of the NDA's redundant facilities will continue beyond the plan period. Certain new development proposals will inevitably be required in connection with the decommissioning of facilities and these should be supported through the Local Plan.	None specified	Policy has been informed by consultations provided, if details have changed in the interim and the Council has not been informed then obviously policy will not reflect these changes – no change.
Britmax Developments	Indigo Planning Ltd.	Yes	Not specified	No	Large developed sites should not be applied only to areas in the countryside, Green Belt locations should also be considered. The Great Birchwood site would be a suitable large developed site.	None specified	The policy does not restrict development of large developed sites in the Green Belt providing it meets with the criteria set out, however this policy is not intended for holiday caravan parks or sites – no change.
James Hall & Co Ltd.	Smith Love Planning Consultants	Not specified	Not specified	Yes	Welcome the inclusion of this policy subject to it some minor modifications.	a. The proposal ~~w~~should not …… of the buildings; b. The proposal …….. network without adversely affecting highway safety; ~~d. Proposed re-development can be safely and adequately served by existing or proposed means of access and the local road network without adversely affecting highway safety;~~ e. Any available opportunities to …… are maximised; and f. Mixed use development is should be promoted on these	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
						sites unless it can be demonstrated that it is not commercially viable It is not intended that…….. parks unless there are overriding reasons for their redevelopment.	
Policy GD6 Promoting Mixed Use Development							
Next Plc.	Peter Brett Associates LLP	Yes	Yes	No	This policy is welcomed due to the flexibility it will allow for the composition of uses within the four identified strategic site locations which include Whyndyke Farm.	None specified	Support noted.
Telereal Trillium	Smith Love Planning Consultants	Not specified	Not specified	Yes	Fully support the encouragement and promotion of appropriate mixed use development at the Whitehills Local Service Centre.	None specified	Support noted.
Britmax Developments	Indigo Planning Ltd.	Yes	Not specified	No	Object to the encouragement of mixed use schemes on strategic sites only. There are a number of alternative sites that lend themselves well to accommodating a mixed use scheme. For example the Great Birchwood site is of a sufficient size and sustainably located in order to accommodate either a single use or a mixed use scheme.	The policy should be flexible to allow consideration of mixed use schemes in other locations.	The policy as currently worded is considered appropriate – no change.
Policy GD7 Achieving Good Design in Development							
Historic England		Not specified	Not specified	No	The words 'where possible' are unnecessary. They provide neither clarity as to when enhancement might be desirable nor bring about any additional planning control over development. The proviso could just as easily be applied to almost every criterion. The NPPF (paragraph 64) states that '*permission*	None specified	The policy does not state 'where possible', it states 'where required' for which the Council considers to be appropriate wording therefore no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					should be refused for....poor design that fails to take opportunities available for improving the character and quality of an area and the way it functions'.		
NFU		Not specified	Not specified	Not specified	The NFU feels that it is important to stress the importance of the alignment of plans, strategies and projects dealing with climate change, adaptation and flood risk management. Reference to climate change are weak, these should be improved and strengthened. Efforts by farmers and others to manage flood risks, protect communities, sequester CO2 and reduce emissions should not be undermined by weak or poorly worded planning policy.	None specified	The policy as currently worded is considered appropriate – no change. Policies in the Plan should be read as a whole. Chapter 13 contains specific policies relating to climate change.
Home Builders Federation		Not specified	Not specified	No	Part 'n' of the policy requires new homes to comply with the relevant design and quality codes in the National Technical Standards. The policy lacks clarity as it does not indicate which optional standards it is seeking to apply, with no mention of the optional water efficiency standard. The introduction of the optional standards is not justified by relevant supporting evidence. Whilst the Council have factored this into their 'Economic Viability Assessment Addendum Report' the HBF remain unaware of any evidence which demonstrates a need or any transitional timescales for implementing the standard. The Council should demonstrate an understanding of the delivery model for the different forms of new housing and the likely effect of standards upon them.	The HBF therefore recommend this element of the policy be deleted. Given the current evidence base it is recommended part 'n' be deleted.	The policy as currently worded is considered appropriate – no change. The Council disagrees with these comments. The Plan is silent on the optional water efficiency standard as there is no justification for it. As written in the justification accompanying this policy, the standard may be imposed by the Council as a planning condition. Part n. quite clearly refers to optimal standard M4(3A) in accordance with Policy H2.

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					The blanket introduction of the space standards may actually reduce choice. The consequent increase in costs and reduction in variety could have a detrimental effect upon affordability and delivery, particularly in more marginal areas. Given that the Council is already failing to meet its affordable housing needs in full this should be a key consideration. Part 'r' - In relation to energy efficiency the Council will be aware that, in relation to housing, energy efficiency measures will be solely dealt with through the Building Regulations and optional standards do not apply. The Council cannot require developers to go beyond the Building Regulations.		The Council has reviewed the latest Housing Standards Review and the ministerial statement dated 25th March 2015, and consider that information contained in these papers encourage councils to use these set of standards, which complement the existing mandatory set of Building Regulations.
CPRE – Fylde Borough		Not Specified	Not Specified	No	CPRE was formed in 1926 initially to limit 'ribbons' of advertisements sprawling into the countryside from urban areas. Although this policy does mention advertisement in part 'w', we would like to see a specific policy for control of advertisements in the Local Plan, with reference to the intended SPD on Advertisements.	Specific policy for the control of advertisements	It is the intention of the Council to produce a SPD specifically on advertisements in 2017. Therefore it is considered that the policy as worded is appropriate – no change.
St. Annes Town Council		Not Specified	Not Specified	Not Specified	The Plan should mention the St. Anne's Design Guide, to facilitate its adoption as a SPD. At the very least the justification text for Policy GD7 should state that detailed design guidance will be issued and that the St. Anne's on the Sea Design Guide, prepared by the St. Anne's on the Sea Town Council, will be adopted as a SPD and will be a material consideration in the determination of planning applications.	To include reference to the St. Annes on the Sea Design Guide.	**MODIFICATION no 012** Delete the 3rd sentence in para 8.29, and replace with *The Town Council prepared a comprehensive Design Guide to accompany the St. Annes on the Sea NDP. It is the Council's intension to adapt and adopt this Design Guide as a Design Guide SPD, which will set out best practice for new*

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
							developments and works within conservations areas.
Persimmon Homes		Not Specified	Not Specified	Not Specified	The inclusion of a requirement for an optional additional space standard requirement as mandatory policy across all new homes is not supported. The national guidance is clear, "where need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies." In order to do this, LPAs should take account of need, viability and timing. We can see nothing throughout the evidence base that would suggest any need for applying national space standards. The Design & Quality Standards as currently set out also requires the delivery of Code for Sustainable Homes, a standard that can no longer be required.	None specified	The policy as currently worded is considered appropriate – no change. The Council disagrees with these comments. As written in the justification accompanying this policy, the standard may be imposed by the Council as a planning condition. The Council has reviewed the latest Housing Standards Review and the ministerial statement dated 25th March 2015, and consider that information contained in these papers encourage councils to use these set of standards, which complement the existing mandatory set of Building Regulations.
PWA Planning		Not Specified	Not Specified	No	Paragraphs 8.24 – 8.27 refer to design and related issues. Much of this supporting text is out of date and does not refer to current regulations, particularly with regard to Design and Access Statements.	In order to rectify this situation, it is requested that the supporting text at 8.23 to 8.27 should be updated to refer to current regulations.	**MODIFICATION no MNR013** Agree with part of the objection made and for this reason paragraph 8.25 will be deleted as this circular was removed in March 2014. However the Council consider the remaining text is appropriate.
Hallam Land Management	Pegasus Group	Not Specified	Not Specified	No	Fully support good design, although this policy includes some unjustified elements. The policy is unclear exactly which optional standards it is seeking to apply. It mentions the optional accessibility and wheelchair housing standard M4(3A), and that the nationally described space standard may be imposed by condition (in supporting paragraph 8.28), but fails to confirm the position with the optional water efficiency	Various textual changes sought.	The policy as currently worded is considered appropriate – no change. Comments are noted, the Plan is silent on the optional water efficiency standard as there is no justification for it. The Council has reviewed the latest Housing Standards Review and the

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					standard, and this should be clarified. Given the lack of supporting evidence, it is recommended that part 'n' is removed until such time that the relevant evidence is provided. In regards to part 'r', the Council cannot, require developers to go beyond the Building Regulations. Part 'v' suggest that the words 'where possible' should be added in respect of a single central useable facility to provide flexibility as there are occasions where this is not achievable.		ministerial statement dated 25th March 2015, and consider that information contained in these papers encourage councils to use these set of standards, which complement the existing mandatory set of Building Regulations.
Policy GD8: Demonstrating Viability							
Greenhurst Investments LLP	Indigo Planning Ltd.	No	No	No	Through the submitted planning application (ref: 16/0524), site ES1 is not a viable employment site in accordance with this policy. In accordance with this Policy, consideration has been given to the suitability and viability of site ES1 to deliver a mixed-use scheme or a retail scheme.	None specified	Comments appear to be related specifically to a planning application rather than the soundness, legal compliance or compliance with DtC, therefore the policy as currently worded is considered appropriate – no change.
Britmax Developments	Indigo Planning Ltd.	Yes	Not specified	No	Support for the acknowledgment that there is scope for the redevelopment of existing leisure and tourism uses for alternative uses; where it can be demonstrated these uses are no longer viable. Where it can be demonstrated that an existing use of a site is no longer viable, consideration should be given to redevelopment for suitable alternative uses.	None specified	The policy as currently worded is considered appropriate – no change.
Fred Moor		Not Specified	Not Specified	No	The plan significantly downgrades tourism compared with the current plan. Safeguarding of the facilities that depend on tourism for their existence is noticeably weaker, and as such policies are inadequate and unsound.	The Policy should be changed or deleted.	The policy as currently worded is considered appropriate – no change. Primary and Secondary designation terms are no-longer considered to be relevant. The Holiday Area(s) Boundary Review is explained in more detail in Appendix 4 of the Plan.

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					There is no evidence or objective justification to delete the present plan's concept of primary and secondary holiday areas. This categorisation should remain. Areas of the North Promenade in St Annes (Glendower Best Western Hotel, Monterey Hotel, various holiday flats etc.) need to be included as part of the defined tourism area.		
Policy GD9: Contaminated Land							
Historic England		Not Specified	Not Specified	Not specified	Criterion (c) is welcomed in relation to heritage protection, but it should be noted that not all contaminated sites will contain heritage assets.	Suggest the following change: '...and to protect ~~conservation and~~ **and conserve any** heritage assets on the site.'	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 9: The Fylde Economy							
CPRE – Fylde District		Not specified	Not specified	No	CPRE disapproves of the lack of a specific policy for the rural economy. Fylde contains 84% is countryside, 10% of which is Green Belt and the other 72% is unprotected countryside. We had commended such a Policy EC3 in the Preferred Options but this was removed in the Revised Preferred Option. A policy for the rural economy should be included in Chapter 9. A policy is required to address the following FLPPV statements: *Rural Areas - Key Characteristic* *2.62 Although agriculture remains an*	Inclusion of a specific rural policy similar to Policy EC3 The Rural Economy from the Preferred Options document	All comments noted. All matters previously addressed by Policy EC3 of the Preferred Option are provided for in various policies of the Publication Version, no change. Policy EC3 The Rural Economy from the Preferred Options document had 6 paragraphs, the substantive matters addressed by each paragraph have

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					important part of the local economy, farm diversification is also required to supplement the rural economy. *Strategic Objective 2: To maintain, improve and enhance the environment by: vii. Protecting best and most versatile agricultural land.* *Strategic Objection 4: To diversify and grow the local economy by: x. Supporting and protecting agricultural and farming operations and appropriate diversification as a key element of the local economy.* Policy GD4 only attempts to address diversification. The Council must seek to ensure that the loss of <u>any</u> agricultural land is kept to a minimum, and that new development is not located or designed in such a way as to create unnecessary conflict between urban fringe development and farming operations. (cf. Local Plan Policy EP22 and its supporting justifications).		been included in the following policies of the Publication Version; Para. 1, 2 & 5 – EC2 Para. 3 – EC1 Para. 4 – GD1 Para. 6 – EC6 See also Council's response on comments received under GD4.
Lancashire County Council		Yes	Yes	No	Paragraph 9.7 - LCC is no longer part of the Blackpool, Fylde and Wyre Economic Development Company.	Paragraph 9.7	**MODIFICATION no MNR014** Delete the following from the 1st sentence of paragraph 9.7……"~~together with LCC~~,"…
Minority Group - Liz Oades		Not specified	Not specified	Not specified	Paragraph 9.8 - The Minority Group commented on the Employment and Economic Land Study and that the consultant determined that whatever statistical approach was used, there was no actual need for additional employment land. The Minority Group suggested that the evidence base is flawed resulting in over-allocation of employment land. Part of this allocation could be used for housing,	Paragraph 9.8 and various others as consultee fundamentally disagrees with the Council's methodology for determining the level of employment land.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Minority Report as submitted refers to the Local Plan to 2030: Preferred Options Consultation Document. There have been many amendments to the emerging Local Plan since this stage.

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					reducing the amount of housing to be built elsewhere. The Minority Group raised concerns that the Employment land study has not been out to public consultation and was not included in the Preferred Options consultation.		The Council does not agree with the consultee's comments. No change to the plan.
Anthony Guest		Not specified	Not specified	No	The FELPS 2012 study has been misinterpreted by the Council leading to errors in policy. My own report and other published Council data clearly shows: **a)** Despite increasing employment, the requirement for employment land has been reducing. Less will be required in 2030; **b)** Employment land has been subject to a general migration towards the M55; this is consistent with a) as new sites are more efficient users of space and older sites have been released for housing or other non-employment use; **c)** Blackpool's need for business and employment land has been addressed by sites in Fylde; Blackpool business land requirement will almost certainly be subject to the same errors as those of Fylde; **d)** There is a large amount of employment land currently tied up in industries that are expected to decline over time. It is not sensible or sound to divorce the BAe Enterprise Zone from consideration of employment land use in the Borough.	Paragraphs 9.8 to 9.12 need to be revised to reflect the substantially lower employment land requirement. Considerable related changes to Policies EC1, EC2 and EC3.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use. No change to the plan.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					e) New employment land take-up is not extra employment land; it is alternative employment land. Paragraph 9.12 and Table 3 fail to understand this. Land taken out of use does not have to be added to the requirement (as methodology being used already allows for it). The Council has failed to examine the evidence provided and as a result it does not understand either the evidence or its meaning and has led to policies that do not respect the evidence. Compromising employment land requirement and availability for housing development on land released from employment use. The above matters are complicated and are inadequately covered in the Local Plan Publication Version.		
Policy EC1 Overall Provision of Employment Land and Existing Employment Sites							
Minority Group - Liz Oades		Not specified	Not specified	Not specified	The evidence base, in relation to Employment Land assessments is, in part, flawed and, therefore, cannot be relied upon. There is an overstated need which results in an over allocation of employment land. This land can be used for housing freeing up Greenfield sites. Comments are made in respect of Mill Farm (Site MUS3) which at time of the Preferred Option Local Plan was referred to as site E4. Comments are also made about a number of sites which are 'identified' but not included.	Substantial changes to EC1 as consultee fundamentally disagrees with the Council's methodology for determining the level of employment land.	All comments noted. The policy as currently worded is considered appropriate – no change. Planning permission has been granted at Mill Farm (site MUS3) and development has commenced. No change to plan.
CPRE – Fylde District		Not specified	Not specified	No	The employment land requirement is excessive, leading to an over-supply of land for employment use, with a knock-on effect of precluding such land being used	Changes to EC1 to reflect a much reduce requirement and therefore provision of employment land.	The policy and relating justification as currently worded is considered appropriate – no change.

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					for housing. Part of the Warton Enterprise Zone land could be counted as an allocation of 'new' employment land. Concerns about the 2012 Study expressed in the Employment Land and share concerns of councillors through the Minority Report they produced. Paragraph 9.11 - We have seen no evidence to justify the 'discussions' *between Blackpool and Fylde Councils which identify that Blackpool Council requires Fylde Council to provide 14Ha of employment land within Fylde Borough, to meet Blackpool's requirement up to 2027* . And this is despite the increased allocation of Fylde employment land in Policy EC1 from 5.0 Ha in the Revised Preferred Option to 14.5 Ha as a consequence of creation of the Blackpool Airport Enterprise Zone.	Change to paragraph 9.11 to remove the need for 14Ha to meet a need identified by Blackpool Council.	The Council does not agree with the consultee's comments. The requirement for Fylde Council to provide for 14Ha of employment land is set out in the Blackpool Local Plan Part 1: Core Strategy (2012-2027), adopted January 2016, para. 5.34. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use.
Next Plc	Peter Brett Associates	Not specified	Not specified	No	Fundamentally disagree with the Council's methodology for determining the level of employment land. Do not consider that the allocation of Whyndyke Farm for solely residential and employment purposes is fully justified when little consideration has been given to any reasonable alternative combinations. Object to the scale and distribution of employment allocations within the Plan, and the possible difficulties associated with their delivery given the constraints imposed by Policy EC1.	Amend EC1 and 9.11 and 9.12 to reduce the overall requirement and provision of employment land. Amend EC1 to give a greater degree of flexibility to site MUS2.	The Council does not agree with the consultee's comments. The policy and relating justification as currently worded is considered appropriate – no change. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.

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					Question justification to provide for 14Ha of employment land on behalf of Blackpool Council.		The requirement for 14Ha of employment land is set out in the Blackpool Local Plan Part 1: Core Strategy (2012-2027), adopted January 2016.
Nuclear Decommissioning Authority	GVA	Not specified	Not specified	No	Support the allocation of Springfields site under EC1. However, the Local Plan does not properly acknowledge the on-going decommissioning process at Springfields. The former nuclear site forms part of the existing employment site allocation under this Policy, which seeks to retain the wider site for B1(a), B1(b), B1(c), B2, B8 uses. However, many of the developments required as part of the nuclear decommissioning activities at Springfields will not fall within Use Classes B1, B2 or B8.	Policy should contain supportive policy wording for the following uses: Amend EC1 to read '…B1(a), B1(b), B1(c), B2, B8, as well as operations and uses associated with the processing of materials and wastes from nuclear fuel fabrication and the decommissioning of redundant facilities…' Amend 9.17 to read …'The Springfield site is subject to activities associated with the processing of materials and wastes from nuclear fuel fabrication and decommissioning of redundant facilities. Decommissioning is a long process which will extend beyond the plan period. Certain proposals for new development (associated with decommissioning) will be required at Springfields…'	The policy and relating justification as currently worded is considered appropriate – no change. Most appropriate to include similar changes in the narrative of the chapter rather than Policy EC1. **MODIFICATION no MNR019** Minor amendment to paragraph 9.17 to reflect comments submitted '…The Springfield site will be subject to activities associated with the processing of materials and wastes from nuclear fuel fabrication and decommissioning of redundant facilities. These activities could fall outside the Use Classes specified in EC1…'
Anthony Guest		Not specified	Not specified	No	The FELPS 2012 study has been misinterpreted by the Council leading to errors in policy.	Delete paragraph 9.11.	The Council does not agree with the consultee's comments.

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					My own report and other published Council data clearly shows: a) Despite increasing employment, the requirement for employment land has been reducing. Less will be required in 2030; b) Employment land has been subject to a general migration towards the M55; this is consistent with a) as new sites are more efficient users of space and older sites have been released for housing or other non-employment use; c) Blackpool's need for business and employment land has been addressed by sites in Fylde; Blackpool business land requirement will almost certainly be subject to the same errors as those of Fylde; d) There is a large amount of employment land currently tied up in industries that are expected to decline over time. It is not sensible or sound to divorce the BAe Enterprise Zone from consideration of employment land use in the Borough. e) New employment land take-up is not extra employment land; it is alternative employment land. Paragraph 9.12 and Table 3 fail to understand this. Land taken out of use does not have to be added to the requirement (as methodology being used already allows for it). The Council has failed to examine the evidence provided and as a result it does not understand either the evidence or its meaning and has led to policies that do not respect the evidence. Compromising employment land requirement and	The reference to 15.3ha land lost to business and industrial use should be deleted in Para 9.12 and Table 3. Policy EC1 needs to be revised to reflect the true employment land requirement (that is to say no requirement above what was already in the planning system in 2012 and a recognition that further brownfield sites becoming available may be considered for housing where appropriate.	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The policy and relating justification as currently worded is considered appropriate – no change. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use. No change to the plan.

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					availability for housing development on land released from employment use. The above matters are complicated and are inadequately covered in the Local Plan Publication Version.		
Telereal Trillium	Smith & Love Planning Consultants	Not specified	Not specified	No	Supports the identification and inclusion of the land within its ownership (ES4 & ES6) at the Whitehills Local Service Centre. Disagrees that development of this land (ES4 & ES6) should be limited to exclusively Class B1, B2 and B8 employment development. The range of complementary, ancillary uses could include conference facilities, hotels, an improved food and drink offer, hospitality, leisure, certain types of retail, showrooms, private and public health and education development.	Amend EC1 to include ES4 within MUS1 as part of a wider mixed use allocation. Amend EC1 to include a broader range of acceptable use classes in respect of ES6 including Classes A1, A3, C1 , D1 and D2 and Sui Generis uses. The reference to ITSA in EC1 should instead be DWP.	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. See also Council's response on comments received under MUS1. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use. The policy and relating justification as currently worded is considered appropriate – no change. **MODIFICATION no MNR017** Minor amendment to EC1 ES6 to be retitled DWP not ITSA.
Fred Moor		Not specified	Not specified	No	This policy is unsound as the study shows unprecedented growth in homeworking, and a significant change in the nature of employment. It shows that extensive land-using industrial processes are in decline, and future employment involves businesses	The evidence needs to be re-examined and re-interpreted to better recognise the changing nature of employment and employment land.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change.

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					that need smaller premises and less land. This is especially because of the growth in service industries and technology companies. These require significantly less land than traditional or historic. The studies also show that in six out of seven predicted scenarios these factors lead to enough existing employment land for the plan period. The arguments are set out in the 'Employment Land and Premises Minority Report'.		The Council does not agree with the consultee's comments. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use.
Blackpool Council		Not specified	Not specified	No	Support the provision of 14 hectares of employment land provision in Fylde to help meet Blackpool's employment land requirement as set out in the Blackpool Local Plan Part 1: Core Strategy (2012-2027), adopted January 2016.	None specified	Support noted.
James Hall & Co Ltd.	Smith & Love Planning Consultants	Not specified	Not specified	No	Relates to Mythop Lodge which is included in the Existing Employment Sites in Policy EC1. Evidence to demonstrate that it is not appropriate to maintain the employment protection policy of the current Local Plan for Mythop Lodge, was submitted via the Council's Call for Sites exercise in 2015, together with an assessment of the potential and merits of the site for alternative mixed-use redevelopment. The Council's evidence base is over 4.5 years old and is therefore not a sound and up to date basis to inform the content of the draft Policy EC1.	Delete Mythop Lodge, Weeton with Preese from Policy EC1.	All comments noted. The policy and relating justification as currently worded is considered appropriate. The Council does not agree with the consultee's comments. **MODIFICATION no MNR047** Minor amendment to Appendices 6 alter '…(albeit with premises presently let to a single occupier)…' to read '…(currently vacant)…'

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Administrators of Greenhurst Development	Indigo Planning	No	No	No	Object to Site ES1 being included within EC1. The long standing retention of the site for employment development goes against the Paragraph 22 of the Framework.	Remove ES1 from EC1.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. Comments relating to the retention of site ES1 being retained for employment use were addressed as part of the Revised Preferred Option Consultation – Responses Report, March 2016.
Balfour Beatty	Nathaniel Lichfield & Partners	Not specified	Not specified	No	Concerned that previous comments raise significant and substantial matters affecting a number of policies in the publication draft of the Plan, which could render the Plan unsound if not dealt with. Issues raised in our previous submissions render the draft Local Plan unsound for a range of reasons including: It is not positively prepared as it seeks to limit land (14.5ha) fronting Squires Gate for development of solely B Class uses, counter to the objectives of the Enterprise Zone to facilitate mixed-use development there. An amendment has been made to the second schedule ("Existing Employment Sites") contained in Policy EC1 to introduce a reference to "Classes A1, A2, A3, A4 and A5" alongside the site referred to as "Blackpool Airport, Squires Gate, Blackpool Airport Corridor". It is unclear if these uses are determined by the policy to be acceptable in new development within the	Policy EC1 and site ES5 should be amended to allocate the whole of the EZ Zone A area for development. The reference to 15.5Ha should be amended to 20Ha and should be to deliver a mix use to be determined through a masterplan for the Enterprise Zone. Clarification under 'Existing Employment Sites'.	All comments noted. The Council does not agree with the consultee's comments. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use. It is the Council's intention to restrict use on this site to B Class uses only. **MODIFICATION no MNR016** Therefore under Existing Employment Sites within the table, alongside: Blackpool Airport, Squires Gate, Blackpool Airport Corridor, under 'Appropriate Uses' make the following

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					ES5 site or whether the first part of the policy continues to restrict future development there to B Class uses.		minor amendment '…A1,A2,A3,A4 and A5…' **MODIFICATION no MNR018** Minor amendment delete '…(Zone A)…' from ES5 within Policy EC1.
The Rigby Organisation	PWA Planning	Not specified	Not specified	No	The Plan fails to provide an adequate supply of land for economic purposes. Promoting land south west of Junction 3 of the M55, Corner Hall Farm, which was previously submitted to the Council in March 2015 following their final 'Call for Sites'.	Policy EC1 should be amended to include additional commercial/employment land allocations and in particular the land identified in consultees submission.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. A Site Assessments Background Paper was published in May 2016, which addresses these comments and concerns.
Policy EC2 Employment Opportunities							
Anthony Guest		Not specified	Not specified	No	The FELPS 2012 study has been misinterpreted by the Council leading to errors in policy. My own report and other published Council data clearly shows: **a)** Despite increasing employment, the requirement for employment land has been reducing. Less will be required in 2030; **b)** Employment land has been subject to a general migration towards the M55; this is consistent with a) as new sites are more efficient users of space and older sites have been released for housing or other non-employment use; **c)** Blackpool's need for business and employment land has been addressed by sites in Fylde; Blackpool business land	Delete Policy EC2 in its entirety together with its justifying paragraphs.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The availability of land for employment opportunities is limited and once lost to non-employment use, particularly residential use, they are unlikely to return to employment use. Therefore there is a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use.

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					requirement will almost certainly be subject to the same errors as those of Fylde; **d)** There is a large amount of employment land currently tied up in industries that are expected to decline over time. It is not sensible or sound to divorce the BAe Enterprise Zone from consideration of employment land use in the Borough. **e)** New employment land take-up is not extra employment land; it is alternative employment land. Paragraph 9.12 and Table 3 fail to understand this. Land taken out of use does not have to be added to the requirement (as methodology being used already allows for it). The Council has failed to examine the evidence provided and as a result it does not understand either the evidence or its meaning and has led to policies that do not respect the evidence. Compromising employment land requirement and availability for housing development on land released from employment use. The above matters are complicated and are inadequately covered in the Local Plan Publication Version.		
BAE Systems	Cass Associates LLP	Yes	Yes	No	One of the Government's priorities for planning is to proactively drive and support economic development which is development, including those within the B Use Classes, public and community use and main town centre uses (excluding housing development). Economic development provides employment opportunities. However, the	EC2 should be reworded to include: '…agriculture, and where appropriate, other uses that contribute to economic development and…'	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The Framework defines 'Economic development' as: Development,

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					policy does not refer to wider uses beyond agriculture.		including those within the B Use Classes, public and community uses and main town centre uses (but excluding housing development). It is not considered relevant for this policy to apply to public and community uses and main town centre uses.
Hallam Land	Pegasus Group	Not specified	Not specified	Not specified	Welcome the Council's support for the delivery of the Lancashire Enterprise Zone and its associated Local Development Order and Phase 1 Masterplan, which is currently being implemented. The Enterprise Zone represents a significant opportunity for Warton in terms of job creation and economic gain.	None specified	Support noted
Policy EC3 Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems Warton							
BAE Systems	Cass Associates LLP	Yes	Yes	No	Part of paragraph 9.28 is potentially misleading. BAE Systems object to the implication that there will be further potential job losses. It is BAE Systems objective to maintain and grow the business on the back of a sustainable and viable business plan and through relationships that may be formed with businesses locating on the Enterprise Zone.	Para. 9.28 delete '…help mitigate the impact of the potential job losses at the Warton Base and the wider impact this will have on the Lancashire economy…'	**MODIFICATION no MNR020** Paragraph 9.28 - delete the following the 3rd sentence: …"~~, help mitigate the impact of potential job losses at the Warton base and the wider impact that this will have on the Lancashire economy~~".
Warton East Developments	Satnam Group	Not specified	Not specified	Not specified	Policy EC3, is supported.	None specified	Support noted
Anthony Guest		Not specified	Not specified	No	The FELPS 2012 study has been misinterpreted by the Council leading to errors in policy. My report provided to the Council, reviewed previous studies, and found errors leading to an overestimate for new employment land. While being superseded by the 2012 study, errors incorporated into	Policy EC3 should be deleted together with its justification. The egregious failure of this EZ to meet its modest employment targets will require an urgent review early in the plan period (it is already overdue) and some flexibility will almost certainly	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.

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					the 2010 Sub Region study have unknown consequences. The 2012 study used 7 different models to predict the additional employment land. Six of the models demonstrated that no additional employment land would be required. The 7th identified a need for substantial additional employment land. This 7th model failed to account for land taken out of employment use over the same periods. The model simply presented a requirement for additional employment land in the plan period. The study's conclusion based 7th model, specifically rejects the conclusions of all the other models, for the purposes of establishing the need for employment land, that same work was accepted as being valid to support an inflated housing requirement. No satisfactory explanations for the study's last minute rejection of its own has been provided. My own report and other published Council data clearly shows: **a)** Despite increasing employment, the requirement for employment land has been reducing. Less will be required in 2030; **b)** Over the years employment land has been subject to a general migration towards the M55; this is consistent with a) as new sites are more efficient users of space and older sites have been released for housing or other non-employment use; **c)** Blackpool's need for business and employment land has been addressed by	be required in planning the effective use of land released from BAe Systems use.	The Lancashire Advanced Engineering and Manufacturing Enterprise Zone is a priority of Lancashire Economic Partnership. Therefore, the Plan must take account of the Enterprise Zone.

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					sites in Fylde; Blackpool business land requirement will almost certainly be subject to the same errors as those of Fylde; **d)** There is a large amount of employment land currently tied up in industries that are expected to decline over time. It is not sensible or sound to divorce the BAe Enterprise Zone from consideration of employment land use in the Borough. **e)** New employment land take-up is not extra employment land; it is alternative employment land. Paragraph 9.12 and Table 3 fail to understand this. Land taken out of use does not have to be added to the requirement (as methodology being used already allows for it). The Council has failed to examine the evidence provided and as a result it does not understand either the evidence or its meaning and has led to policies that do not respect the evidence. Compromising employment land requirement and availability for housing development on land released from employment use. The above matters are complicated and are inadequately covered in the Local Plan Publication Version.		
BAE Systems	Cass Associates LLP	Yes	Yes	Yes	BAE Systems support the inclusion of a policy promoting the Lancashire Advanced Engineering and Manufacturing Enterprise Zone at Warton Aerodrome.	None specified	Support noted
Policy EC4: Blackpool Airport Enterprise Zone							
Balfour Beatty	Nathaniel Lichfield & Partners	Not specified	Not specified	No	Concerned that their previous comments could render the Plan unsound if not properly dealt with.	**Policy EC4** should be amended as follows: *a) …… commercial aeronautical activity and to*	All comments noted. **MODIFICATION no MNR021**

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					For a range of reasons including: It is not justified in its approach, as it is not the most appropriate strategy for fulfilling the objectives of the Enterprise Zone, as set down in the Full Business Case for the Enterprise Zone and being brought forward through the preparation of the EZ masterplan. Whilst much of the airport's land is within the Green Belt, permitted development rights would enable the relocation of operational and aviation-related buildings and facilities, including a new terminal building, closer to the runway. Such relocation of buildings and facilities from the Squires Gate frontage will release a substantial area of land (c.20ha) and the redevelopment of this land for non-operational uses presents an opportunity to generate capital to fund the development of modern, fit-for-purpose and efficient operational buildings and facilities closer to the runway. There are five Zones (A-E) within the EZ area. An important component in the successful delivery of the EZ outputs is the award of Enhanced Capital Allowances [ECA] and an ECA designated zone has been identified as Zone D, where new manufacturing, logistics, offices, laboratories and other businesses are to be concentrated. We welcome the introduction of Policy EC4 and that the Council supports the sustainable development of Blackpool	*relocate operational buildings and facilities closer to the main runway. The Enterprise Zone will help improve the local economy and also increase the contribution to national growth.* *b) ~~Enabling~~ Assessing Development* *Fylde Council, working with Blackpool Council, Lancashire County Council and stakeholders including key landowners is to produce a land use masterplan for the Enterprise Zone area. The masterplan will determine the appropriate mix, quantum and location of development in the area, reflecting the delivery objectives of the Enterprise Zone and that of maintaining a viable long-term operation of Blackpool Airport. A range of uses including business, industrial, education, retail and aviation-related facilities, have been identified as outputs in the Enterprise Zone area. Aviation-related uses will be supported where they will contribute towards the long-term operation of the Airport. Non-employment uses, ~~Alternative uses~~, such as retail~~, employment~~ and leisure will ~~may~~ be appropriate where it can be demonstrated that they conform with the masterplan*	Minor amendment to EC4 criterion a, include '…main runway in the areas outside the Green Belt, unless…' to ensure consistency with T3. **MODIFICATION no MNR023** Amend EC4 criterion b to remove reference to employment uses to ensure consistency with wider Enterprise Zone ambitions. Minor amendment delete '…employment…' from criterion b EC4.

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					Airport. Our concerns with Policy EC4 primarily relate to: • Clarification as to how Local Plan policy is providing a positive policy context for the relocation of aviation functions from land fronting Squires Gate Lane (outwith the Green Belt) to land closer to the main runway (within the Green Belt), in order to achieve consistency with the objectives of the Enterprise Zone; and • The apparent requirement to demonstrate an "enabling case" for non-aviation uses proposed on the Squires Gate land and the acceptability of such an approach. The current wording of Policy EC4 blurs the distinction between what is a policy requirement which development proposals should seek to satisfy and the principle of "enabling" which would ordinarily only be pursued on occasions where proposals are in conflict with policy. Changes are proposed in order to ensure alignment between the Local Plan, the EZ objectives and its masterplan, and Balfour Beatty's objectives for the long-term operation of the airport.	*for the Enterprise Zone and where it can be demonstrated that a) there are no sequentially preferable locations within or on the edge of designated centres that are available and suitable to accommodate them and b) there would be no significant adverse impacts on investment and the vitality and viability of designated centres, as well as satisfying ~~are essential to help the delivery of aviation uses on the site. The scale of any alternative enabling development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the maintenance of the primary aviation function of the site. Any proposed main town centre uses must satisfy the sequential and impact tests set out in the National Planning Policy Framework and the~~ relevant policies in this Local Plan.* *c) ……..produce a Local Development Order to aid the delivery process. A Masterplan will also be produced and be adopted, which will form a key part of the overall delivery of the Enterprise Zone, together with an agreed programme*	**MODIFICATION no MNR024** Minor amendment include '…& Masterplan…' to criterion c, EC4. See also Council's response on comments received under Policy T3.

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						of implementation in accordance with the Masterplan. The key purpose of the Masterplan will be to establish the development and design framework for the site and ensure ……. it is in accordance with the relevant parameters within the Local Development Order.	
Blackpool Council		Not specified	Not specified	No	This is a new policy following the designation of the Blackpool Airport Enterprise Zone (EZ) in April 2016. Blackpool is supportive of the Airport EZ and the commercial opportunities it will provide for new and existing businesses on the Fylde Coast. The EZ will be a vital source of job opportunities for residents in Blackpool, Fylde and further afield. Therefore, the inclusion of a policy setting out the planning framework for this area is supported. However, we have concerns that the policy, appears unduly restrictive. It does not support the development sectors that are targeted by the EZ. The Department for Communities and Local Government website set out the target business sectors for the site. These include the energy industry, advanced manufacturing and engineering, food and drink manufacture and the digital and creative sector, with companies outside of these sectors also welcomed. Policy supports the sustainable development of Blackpool Airport, however, whilst criterion a of the policy identifies the EZ it does not provide a	It is suggested that employment uses are not listed as enabling development in the policy. Amend para. 9.7 to state that the Enterprise Zone will continue until 2040 not 2037. Support the development sectors that are targeted by the EZ.	**MODIFICATION no MNR023** Minor amendment to EC4 criterion b to remove reference to employment uses to ensure consistency with wider Enterprise Zone ambitions. Minor amendment delete '…employment…' from criterion b EC4. **MODIFICATION no MNR015** Minor amendment to para. 9.7 delete '…2037...' replace with '…2040…' **MODIFICATION no MNR022** Minor amendment last sentence of criterion a EC4 to read '…The Enterprise zone will help improve the local economy and also increase the contribution to national growth through targeting the energy industry, advanced manufacturing and engineering, food and drink manufacture and the digital and creative sector…'

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					sufficiently positive policy framework for development of the EZ target sectors, or other sectors that would encourage job creation and industry diversification. The policy should provide support for these sectors and other employment uses, providing that such development does not compromise commercial aeronautical activity at the site. Criterion b of the policy, is too restrictive. This could discourage target sector employment uses from locating on the site. We are concerned about the identification of retail and leisure as potential enabling development on the site. There may be a case for limited retail in the form of bulky goods, or other uses that are less well suited to a town centre location (for example garden centres) but the provision of units for unrestricted retail uses would not be acceptable and this needs to be made explicit in the policy and supporting text. We also consider it is inappropriate to include leisure uses within the policy, which could negatively impact upon Blackpool's planning policy framework for Blackpool town centre, the resort core and resort regeneration.		The Council does not agree with the consultee's comments relating to retail and leisure uses within the Blackpool Airport Enterprise Zone and EC4. The Council considers that the policy when read as a whole does not conflict with The Framework or other relevant policies in this Plan or The Blackpool Local Plan Part 1: Core Strategy (2012-2027), adopted January 2016.
Lancashire Enterprise Partnership (LEP)		Not specified	Not specified	No	The LEP objects to the wording of the policy. Currently the policy does not support the purpose of the EZ and could be interpreted in a way that could prevent key uses and developments coming forward. The policy is therefore contrary to the Government's award of EZ status and the LEP's support and approval of the successful EZ submission.	It is critical that the wording of the policy be revised to ensure that employment uses are supported in line with the purposes of the EZ designation. Reference to EZ stakeholders in the policy and throughout should include the LEP.	**MODIFICATION no MNR023** Minor amendment to EC4 criterion b to remove reference to employment uses to ensure consistency with wider Enterprise Zone ambitions. Minor amendment delete '…employment…' from criterion b EC4. **MODIFICATION no MNR022**

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					The wording of Part b Enabling Development sets out that "alternative uses such as retail, employment and leisure may be appropriate where it can be demonstrated that they help deliver aviation uses on the site". By including employment as an enabling use this could be interpreted as saying that only aviation uses are generally acceptable, and that employment will only be allowed if it helps to deliver aviation uses. This would significantly restrict and hinder the development of the EZ. Whilst the value of retaining the site's "aero park" functionality is recognised, it is also important to ensure that the location is capable of attracting the target sectors that have been identified with Government as part of the successful EZ application. The policy and justification do not reference any of the EZ's target sectors including energy. Paragraph 9.7 of the Plan sets out that "Blackpool Airport Enterprise Zone will become a centre of excellence for the energy sector". This should be picked up in the policy. The Lancashire Energy HQ, will be important in developing the Blackpool Airport EZ as part of the suite of 4 Enterprise Zone sites across Lancashire.		Minor amendment to last sentence of criterion a EC4 to read '…The Enterprise zone will help improve the local economy and also increase the contribution to national growth through targeting the energy industry, advanced manufacturing and engineering, food and drink manufacture and the digital and creative sector…'
Next Plc	Peter Brett Associates	Not specified	Not specified	No	Support the flexible approach and wording within Policy EC4 to allow for enabling development. Consider could also be adopted at the four strategic locations for development, to assist with infrastructure costs and help to enable the sites to commence. Policy EC4 which allows for a greater range of alternative uses including retail, employment and leisure uses through enabling development in this particular location.	None specified	Comment noted

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					Commercial development that can come forward should be advocated which would assist with delivery, allow for enabling development to be brought forward (as is the case in Policy EC4) and to comply with the NPPF.		
Policy EC5: Vibrant Town, District and Local Centres							
The Theatres Trust Mr Anthony		Not specified	Not specified	Not specified	Supports proposed Policy EC5.	None specified	Support noted.
Mr Chris Hill	De Pol Associates Ltd	Not specified	Not specified	No	Comments received relate to the proposed new local centre at Warton. The identification of this centre on the Policies Map is considered not sound and does not meet the requirements of the plan. It is considered that the Local Plan is not sound when considered against the tests outlined in paragraph 182 of the Framework for the following reasons: The proposed Local Centre site has not been assessed to establish whether it can meet the infrastructure requirements of the proposed housing allocations for the settlement. There is limited opportunities to meet the recognised lack of services and facilities to deliver the plan. The site submitted in these representations would provide scope for a range and variety of services which would meet infrastructure requirements and provide for a sound plan The location of the proposed Local Centre is not justified. The location has been identified but it would appear that consideration has not been given to a new location which could provide modern purpose built facilities to operate alongside	The local centre should be relocated to the location identified on the accompanying plan (Ref: DPA_01).	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The blue triangle on the Policies Map is indicative only. The Council will work with various stakeholders to find the most suitable location to develop the local retail centre. See also the Council's response under DLF1.

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					the existing limited range of services in the settlement. This alternative strategy of a new facility should be considered a more appropriate strategy.		
Hallam Land Management Ltd	Pegasus Group	Not specified	Not specified	No	Policy states that a new local retail centre, will be developed in consultation with Bryning with Warton Parish Council, on previously developed land owned by BAE Systems on Lytham Road. However, the proposals map does not show the extent of the intended centre. The new Local Retail Centre should be clearly indicated on the proposals to support the level of housing and employment growth.	The new Local Retail Centre should be clearly indicated on the proposals to support the level of housing and employment growth	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. The blue triangle on the Policies Map is indicative only. The Council will work with various stakeholders to find the most suitable location to develop the local retail centre. Also considered under Policy DLF1.
Policy EC6: Leisure, Culture and Tourism Development							
Fred Moor		Not specified	Not specified	No	Paragraph 9.63 - There are no 'night time' uses of Lowther Gardens or the Pavilion, (such as night clubs for example), and I argue there should be none, given the surrounding residential area in which care homes and nursing homes predominate.	Amend third sentence of paragraph 9.63.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.
BAE Systems	Cass Associates LLP	Yes	Yes	No	Zone Six of the Coastal Masterplan within the Coastal Strategy relates to land on and adjacent to Warton Aerodrome. BAE Systems would object to any infrastructure provision or development within this Zone that would have a detrimental impact on its operational requirements and communication systems at the Aerodrome.	Amend Oolicy EC6 i to: Implementing the infrastructure projects identified in the Coastal Strategy, including the delivery of tourism and recreation, taking account of any potential impact it may have on the operation requirements and	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.

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					BAE Systems consider that the policy and supporting statement must reference the need for suitable safeguards to the operational requirements and communications systems at the Aerodrome from any development associated with the Coastal Strategy. This would be in line with Policy CL3 which relates to renewable and low carbon energy generation affecting facilities such as Warton Aerodrome.	communication systems of adjacent land uses such as Warton Aerodrome.	Policy DLF1 seeks to resist any potential adverse impact upon Warton Aerodrome.
Fred Moor		Not specified	Not specified	Not specified	Welcomes the very firm statement that *"Non leisure, culture and tourism uses will not be permitted in this Sea Front Area."* There is a small conflict between the recently issued development brief for this site and the proposals map. The proposals map fails to show the boundary of the designated Seafront Area as including the approach to it (which is currently used for access and parking) and which is included within the plan in the development brief. This access and parking area lies within the historic parks and gardens designation.	Either the development brief should be changed to exclude the access and car parking area, or the proposals map should include that area within the 'Seafront Area' designation.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Object to the approach that tourism, cultural, heritage and leisure assets will be protected; in particular tourism and leisure uses. There is no definition of what is considered to be an 'asset'; so it is difficult to know exactly what the policy is seeking to protect. The redevelopment of a site that is an existing tourism or leisure use should be assessed and considered on its own merits. The continuation of an existing use at a site will not always be the most suitable. Rather than see sites and existing operations deteriorating there should be	The rural tourism part of this policy should be amended to also support large scale rural tourism at appropriate sites.	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments.

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					flexibility incorporated into this policy that allows the redevelopment of existing tourism/leisure uses for alternative forms of development where appropriate. As currently drafted the policy is not positively prepared or justified as it does not represent the most effective strategy for meeting future development needs. Sites outside settlement boundaries may be suitable and able to accommodate more large scale rural tourism facilities and, subject to such uses being able to be suitable accommodated on site with no adverse impacts to the surrounding environment should be encouraged and supported.		EC6, criterion f is phrased as 'protecting…with a view to helping them to adapt to new challenges…' this is markedly different from a more preservationist approach and it is felt that this policy as currently worded is positively prepared. EC6 does provide for some further, although not exhaustive, definition of leisure assets.
Policy EC7: Tourism Accommodation							
Fred Moor		Not specified	Not specified	No	This policy is too weak to safeguard the stock of tourist accommodation and the holiday areas. This is nowhere near as strong as the current TREC1 policy which says *changes of use* ***will not be allowed*** There is no evidence or objective justification to delete the concept of secondary holiday areas set out in the existing local plan. This change is nothing more than Fylde's present policy, and it mirrors both the logic and the wording used to maintain the 'critical mass' of attractions on The Island Seafront Site in relation to Policy EC6.	The concept of primary and secondary holiday areas should be maintained and mapped, and changes to primary holiday areas should not be *"resisted*", they should be refused in order to retain the 'critical mass' of accommodation for holidaymakers.	The policy and relating justification as currently worded is considered appropriate – no change. 'Resisted' is considered to be a suitably strong word in the context of the Framework. Primary and Secondary designation terms are no-longer considered to be relevant. The Holiday Area(s) Boundary Review is explained in more detail in Appendix 4 of the Plan.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Object to the long term protection and retention of all holiday caravan pitches purely for holiday purposes, requiring a site to be retained for its existing use does not represent a positively prepared or justified	Change wording of Policy EC7.	The policy and relating justification as currently worded is considered appropriate – no change. The Fylde Coast Sub-regional Visitor Accommodation Study, 2009

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					approach to meeting future development needs. Holiday caravan sites can become unviable, and preventing the redevelopment of such sites for alternative forms of development runs the risk the caravan park operations at the site will need to cease and the site become vacant and potentially fall into a state of disrepair. Having the flexibility to assess such sites and consider redevelopment opportunities means that sites can remain in active use and continue to meet the various needs of the community and borough.		recommends that conversion and loss is resisted in order to maintain an adequate supply of holiday accommodation.
Caravan Club	Savills	Not specified	Not specified	Not specified	The Club are keen to remain in the local area and believe that it brings leisure and employment benefits to the area. However, land directly to the south of their site is being promoted for residential development, and the land directly adjacent to their site is being promoted for a mix of both employment and residential development. In the event that this change proves negative to The Caravan Club's members, The Club may wish to search for suitable alternative premises. However, as worded this policy would be prohibitive towards The Club being able to relocate in the event that its site incurs a decline in visitor numbers and a decline in its viability.	If this site is not to be included in site MUS1, The Club request amendments be made to Policy EC7 to include a level of flexibility that is not currently afforded.	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. See also Council's response on comments received under Policy SL2 & MUS1.
Cross Cutting Themes in Chapter 9							
Historic England		Not specified	Not specified	No	Much of Chapter 9 deals with the conservation of the historic environment; improvements to town centres and leisure and recreational assets. If appropriate heritage protection is not secured through development encouraged by this section of	None specified	Comments noted. As stated in paragraph 1.8, the Local Plan should be read as a whole. Chapter 9 should be read in conjunction with Chapter 14

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					the Local Plan it will not satisfy paragraph 8 of the Framework.		

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Chapter 10: Provision of Homes in Fylde							
Policy H1: Housing Delivery and the Allocation of Housing Land							
Home Builder's Federation		Not specified	Not Specified	No	The housing target is expressed as a minimum which is supported, however, it should also be expressed as a net figure The Council should have used the 2014SNHP as their baseline starting point for calculating their OAN. The HBF recommend that the employment scenarios are updated in line with the 2014SNHP. From the HBFs interpretation of the findings of Addendum 1 the Housing Requirement Figure should be increased to 440 -450. There is a considerable requirement for affordable housing, an increase in the total housing figures should be considered where it could help deliver the required number of affordable homes. In conclusion the evidence supports the HBF position that the proposed housing requirement is too low and does not align with the economic strategy within the plan, nor will it meet the affordable housing needs of the area. It is therefore recommended that the housing requirement be increased towards the upper end of the objectively assessed needs range identified in the SHMA Addendum 2, 440 to 450dpa (net). The scenarios should be rerun using the 2014 based SNHP as their starting point.	Housing figure to be expressed as a net figure. Scenarios should be rerun using the 2014SNHP. Housing Requirement figure increased to 440-450. Include triggers for an early review. 20% buffer of sites to meet Wyre's needs. Reduce windfall allowance. 50 empty homes removed from supply.	**MODIFICATION no MNR025** Housing requirement figure should be expressed as a net figure. The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the plan period. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages

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					Policy H1 is unsound as it is not justified, effective or positively prepared. The Housing Requirement Figure should be 440 to 450dpa based on current evidence. If parts b and c of HL1 are failing the council should consider triggers for an early review. The Five Year Supply methodology is correct and in compliance with the NPPF and PPG however, the input of 370dpa is disputed, additional sources of supply are needed. The HBF does support the Council in attempting to provide a supply which is greater than the requirement, we do not consider a buffer of 123 dwellings to be sufficient. The need for a buffer is supported by the Local Plan Expert Group2 recommendations to Government for a 20% buffer of reserve sites. The provision of a buffer would provide flexibility in dealing with unmet needs from Wyre Council. The HBF agrees with an allowance for small sites completions and question whether there is any discount of small sites commitments and minded to approve to deal with non -implementation. The HBF supports non -inclusion of windfalls before 2021/22 to avoid double counting. The Council has not provided sufficient evidence to support the windfall allowance of 40dpa. The supply also includes an allowance for 50 long term empty homes. Local Planning Authorities need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in the plan		41-44). The Council's position remains unchanged. There is no requirement to include a 20% buffer of extra sites. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. The Council does apply a 10% discount to all of its five year supply of sites for non- implementation. The Adopted Local Plan does not include any allocations therefore all sites/completions are windfalls, the Council is satisfied from its existing monitoring that 40dpa is a robust figure. From the Housing Land Availability Schedule there have been an average of 30 conversions each year since April 2011. It is likely that significantly more than 10 other completions will take place each year within the urban areas on windfall sites. The SHMA does consider vacant properties at Section 4.31, a count of empty homes was undertaken on 30th September 2013, those empty homes were not counted within the existing stock for the purpose of calculating the overall need for additional dwellings. No change to the Plan.

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					(PPG). The HBF recommends that fifty empty dwellings are removed from the supply.		
CPRE – Fylde District		Not specified	Not Specified	No	The figure of 370 dpa is based on an objectively assessed need calculation based on unrealistic scenarios leading to an unreasonably high figure. Taking into account the perceived capacity of the industry and market signals reflected in the increasing shortfall in take up of permissions and completion, CPRE suggests the realistic achievable housing requirement for Fylde ought to be circa. 250 homes/year. CPRE agrees that the Liverpool method is the most appropriate in Fylde, given the unrealistic housing requirement and the consequent history of under-delivery since the start of the plan period which has resulted in a large notional shortfall of new homes.	Housing requirement figure should be reduced to 250 homes/ year.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Council notes CPRE's support for the Liverpool method.
Strategic Land Group	Turley	Not specified	Not specified	No	Turley question the findings of the Council's Housing Requirement Paper 2016 stating that there does not appear to be an up to date evidence base to support this conclusion. No account has been taken of the 2014HP. The FLP does not make any provision to accommodate any of Wyre's housing requirement, despite a specific request to do so. Increasing the supply of strategic sites would make this a realistic possibility. The framework does allow for windfalls in the five year housing supply however, it does not make provision for such sites in	An increase in the housing requirement. Increase the supply of sites at the strategic locations. The contingency figure of 122 dwellings is too low. Windfalls should be removed from the plan.	Turley are attributing the SHMA to Turley Economics, however, for clarification the name on the SHMA is Turley. The SHMA and Addendums provides an up to date evidence base which the Council has used to derive its housing requirement figure. The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The

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					development plans. Reliance on windfalls is contrary to the framework. An increase in the housing requirement, as advocated by SLG, would worsen the degree to which the FLP would be unable to meet the requirement (including Wyre's requirement) and would mean the identification of additional housing allocations is essential.		difference is 1% which is not considered to be significant over the plan period. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. The plan is being implemented, most of the strategic sites have planning permission and many of them are under construction, therefore the contingency figure does not need to be increased. The plan does not make an allowance for windfalls throughout the plan period. It makes an allowance for 40 dwellings per annum from year 21 to year 32. This is considered a conservative estimate. From the Housing Land Availability Schedule there have been an average of 30 conversions each year since April 2011. It is likely that significantly more than 10 other completions will take place each year within the urban areas on windfall sites. No change to the Plan.
Gladman Developments		Not specified	Not Specified	Not specified	We critically submit that the plan fails to identify what the full objectively assessed need (OAN) for housing is, and that subsequently the plan is progressing a housing requirement which fails to meet the borough's full OAN.	The housing requirement figure must be increased to the full OAN. Amend criteria b – wording not specified.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages

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						More sites should be included in the plan.	41-44). The Council's position remains unchanged.
					The 2014 based Household Projections were published on 12th July 2016 and have not been considered.		The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the plan period.
					Gladman question whether an increase in the total housing figures would secure delivery of the Council's full OAN for market and affordable housing.		The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the Council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8.
					Gladman object to criteria b of HL1 and state that the policy needs to be able to react to market conditions and not obstruct the delivery of sustainable growth opportunities from being delivered.		Commitments are high, 65% of the supply identified in the Local Plan has planning consent, the Local Plan is facilitating the delivery of sustainable development.
					More sites should be included in the Plan.		No change to the Plan.
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	We take issue with the overall housing requirement and the wider HMA and how this aligns with the Lancashire Enterprise Partnership ambitions to create 50,000 new jobs over the period 2015 to 2025, as set out in the LEP's Strategic Economic Plan.	The housing requirement figure should be increased to 440-450 dpa plus a buffer for non- delivery giving a total proposed supply of 11,088-11,340 which represents an increase of 3,450 dwellings (44%) from the current identified supply.	As stated in the Council's previous response the purpose of the Local Plan is not to meet the LEPs growth targets. There is no explicit obligation to meet the LEP growth targets through its housing number.

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					The figure of 370dpa in Policy H1 Chapter 10 should be expressed as a net figure. Council officers reported the findings of the draft SHMA to Cabinet in April 2014, in the draft Fylde Housing Requirement paper 2014, which suggested that a housing growth figure of 366 dpa was most appropriate; although this paper acknowledged that 404 dwellings per annum would be required to meet the council's employment aspirations. Paragraph 5.27 of Addendum 2 SHMA states that a figure of 440-450 dwellings per annum would be required to support the level of economic growth forecast in the employment evidence for the Local Plan. The 2014PP and 2014HP show an increase in both population 7.1% and households 9.9% across the same period. Future housing land requirements will need to account for the needs of the elderly as the SHMA did not model housing needs for the elderly. The Local Plan has been limited to an assessment of these needs and on the basis of a strategy that does not meet the FOAN of standard C3 housing. The plan seeks to provide a supply which is 6dpa greater than the proposed requirement, this is clearly insufficient, therefore, a buffer of 20% should be	The housing requirement figure of 370 dwellings per annum should be expressed as a net figure. Supply must be increased to take account of the needs of the elderly as the SHMA didn't model the needs of the elderly. Headroom should be increased by adding a 20% buffer, remove windfall allowance, there should be a 44% increase in supply.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. **MODIFICATION no MNR025** The Council agrees that the housing requirement figure of 370dpa should be expressed as a net figure. The draft housing requirement figure does not acknowledge that 404 dwellings would be required to meet the Council's employment aspirations. Nor does paragraph 5.27 of Addendum 2 state that a figure of 440-450 dwellings per annum would be required to support the level of economic growth forecast in the employment evidence for the Local Plan. The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the period. The SHMA did take account of the future needs of elderly people. The only group it did not consider are

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					provided in line with the HBF's submission to the Revised Preferred Options. This would require land to be identified to accommodate an additional 3,197 to 3,449 dwellings, over and above the current allocations. The Council should consider triggers for an early plan review if the plan is failing to deliver. Windfalls – we welcome the fact that the proportion of windfall and smaller/non-strategic sites has reduced from 31% to 22% of the total supply since the 2013 Preferred Option, as this introduces more certainty into the process. There is some evidence of past windfall and we welcome the fact that the proposed allowance is only applied from year 11 onwards as this removes double counting. There is no compelling evidence that this past rate of windfall allowance will continue throughout the plan period. Given that the previous plan contains no allocations all completions will have been windfalls, as such windfall opportunities will have been partly exhausted over the past five years and there is no evidence to indicate that windfall developments would continue at the same rate and scale. In summary HLM, strongly object to the proposed housing requirement and distribution strategy set out in this Revised Preferred Option. The housing requirement number should be increased to 440-450dpa. The plan needs to identify a total supply of between 11,088 and 11,340 dwellings to be able to deliver this requirement with a suitable buffer for non-		those living in nursing homes at the time of the study, see para 10.11. A 20% buffer of extra land is not needed. Commitments are high, 65% of the supply identified in the Local Plan has planning consent, the Plan is already facilitating the delivery of sustainable development. An allowance for 40 windfall completions per annum is considered to be a conservative estimate. From the Housing Land Availability Schedule there have been an average of 30 conversions each year since April 2011. It is likely that significantly more than 10 other completions will take place each year within the urban areas on windfall sites. No change to the Plan.

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					delivery which represents an increase of 44% from the current identified supply.		
Mactaggart and Mickel Ltd.	Colliers International	No	No	No	The OAN requires a greater number of minimum housing units than currently stated. The Council are over 800 units behind in meeting their 370 unit requirement from 2011. This demonstrates that further housing allocations are required to rectify this backlog that is already building up at the outsets of this plans delivery period. The shortfall should be provided over the first five years of the Local Plan period, to make up the shortfall to provide the required houses now and in as short a timeframe as possible. MacTaggert and Mickel's site at Moss Side Lane Wrea Green should be allocated, this will ensure that the housing requirement is met in full over the plan period.	Increase the housing requirement number. The Sedgefield method should be used for the Local Plan Five Year Supply calculation. Further land allocations are needed in particular the respondent's site at Wrea Green.	The Council disagrees the Liverpool method is appropriate for the Local Plan. No additional land needs to be included in the plan, the plan will deliver a Five Year Supply throughout the plan period.
Warton East Developments	Satnam Group	Not Specified	Not Specified	Not Specified	Policy H1 should be based on a proper and thorough up to date assessment of housing needs to date this has not been undertaken. The main function of the plan is unsound and not in compliance with policy or good practice guidance. The policy should be amended to reflect the outcome of an up to date assessment of housing need in the borough. This is substantially more than the 370dpa proposed. NLP provide an interpretation of the conclusions of Addendum 2 of the SHMA. NLP criticise the findings of the Housing Requirement Paper 2015. NLP request that Turley apply a market signals uplift of 10%. They also state that Turley are clearly suggesting that Fylde's OAN is 440-450dpa.	The OAN range should be 425-460 with the housing requirement figure at the top end of the range. Suggested amendments to the way the Council carries out its Five Year Supply calculation.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Council does not agree with NLP's findings. The Council contends that the five year supply calculation is correct and that at the 31st March 2016 it had a 4.8 year supply, the five year supply methodology will continue to be

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					They also request that a further 5% uplift should be applied to deliver more affordable housing. The resultant OAN range is 425 -460. NLP then provide a detailed critique of the Five Year Land Supply calculation and recommend changes.		updated in line with emerging best practice. No change to the Plan.
Story Homes Ltd.	Barton Willmore	No	No	No	Since the Publication of Addendum 2 CLG published their 2014- based sub national household projections (2014SNHP) on 12th July 2016. For Fylde, the 2014 SNHP see the number of households increase from 221 to 256 per annum. The PPG states that new projections do not automatically mean that the housing assessments are rendered out of date every time new projections are issued; however, the projections indicate an increase in the number of households, therefore this has the potential to increase the requirement. The Housing Requirement should be adjusted to meet the Borough's economic growth aspirations, to 'boost significantly' housing supply' and to encourage sustainable economic growth. There is a case to be made for a further uplift to the housing requirement to boost the supply of affordable housing. The Council has provided no sound evidence that this would compromise the plans strategy by requiring further land allocations in unsustainable locations. Fylde Local Plan should identify the quantum of assistance it is willing to provide, or providing a mechanism to enable an early plan review once the scale of the unmet need from Wyre is identified.	The plan should not be submitted for examination until the Council has assessed the implications of the 2014HP. The Housing Requirement number should be increased to 440dpa. The buffer of 121 dwellings is inadequate and should be increased by allocating more land. The Local Plan should commit to an early review. More land should be allocated as a contingency.	The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the period. The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the Council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre

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					In addition the Local Plan should allocate additional land as part of the Local Plan as a contingency should the allocations fail to deliver.		Council in accordance with the Duty to Cooperate. The Council does not consider additional allocations are needed as sites are delivering at all of the strategic locations. No change to the Plan.
Story Homes Ltd.	Barton Willmore	No	No	Not specified	Paragraph 10.23 of the Publication Draft Document states a number of small sites and windfall homes may be built over the plan period based on previous small sites and windfall trends. In our Client's view, the adoption of a robustly prepared and up -to-date Local Plan may result in a reduction in the number dwellings coming forward on windfall sites in contrast to past trends. A sufficient supply of housing land will reduce the need for windfall development coming forward during the plan period. The thorough preparation required in adopting the plan will mean that many potential windfall sites will already be known and allocated by the Council. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of windfall allowance is not used as a mechanism to reduce the numbers of sites allocated within the Plan.	A cautious approach to windfalls.	The Adopted Local Plan does not include any allocations therefore all sites that have come forward are windfalls, the Council is satisfied from its existing monitoring that 40dpa is a conservative estimate. From the Housing Land Availability Schedule, there have been an average of 30 conversions each year since April 2011. It is likely that significantly more than 10 other completions will take place each year within the urban areas on windfall sites. No change to the Plan.

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Story Homes Ltd.	Barton Willmore	No	No	No	Small Sites Committed and Minded to Approve from 2017 to 2021. A non delivery allowance should be applied to this figure to take into account the fact that not all of the permissions will come forward. Long Term Empty Homes – in calculating the housing requirement the Council has applied a vacancy rate of 6.6% to the household projection. The Council has provided no robust evidence to substantiate the claim that the Council intends to identify and bring back into use empty homes and buildings in line with local housing and empty homes strategies. Until such time, the inclusion of re-occupation of empty homes cannot be recognised as a legitimate source of supply in terms of meeting housing need against the housing requirement. It should therefore be removed from the overall supply.	A non delivery allowance should be applied to the small sites committed and minded to approve. Remove the allowance for long term empty homes from the plan.	A non delivery allowance is applied to the five year supply calculation to take into account the fact that not all of these permissions may come forward. The Council does publish evidence on its strategies for bringing empty homes back into use via reports to the Environment, Health and Housing Committee. From April 2014 to July 2016 there has been a significant and continuing reduction of 122 (2 years plus empty dwellings). The inclusion of re- occupation of empty homes can therefore be recognised as a legitimate source of supply in terms of providing housing supply against the housing requirement. No change to the Plan.
Mr. D. Haythornthwaite	PWA Planning	Not specified	Not Specified	No	The Housing Requirement figure should be increased to the upper figure set out in the SHMA. Wyre Council has sought assistance from Fylde Council, Fylde Council have set a housing figure below the SHMA upper limit, Fylde will be unable to meet its own needs, and certainly not those from Wyre Council. The plan is considered unsound on the basis that it is not 'positively prepared' nor will it be 'effective' in meeting need, consistent with achieving sustainable development and ensuring effective joint working on cross boundary housing issues.	The housing requirement figure should be no less than 420dpa.	The Council has evidenced the Housing Requirement figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. No change to the Plan.

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					In order to rectify this situation, it is requested that:- (i)Policy H1 should be amended to include an increased minimum housing requirement figure of no less than 420 dwellings per annum.		
Mr A Bradshaw	Emery Planning	Yes	Yes	No	We have no specific comments to make on the proposed requirement as there have been a number of factors which have resulted in an uplift from the demographic starting point. Since then the major change is the household projections, which increase by 8% from 219 households to 237 households, this increase in the starting point means that there should be an uplift to the housing requirement. The Five Year Housing Land Supply methodology is described in some detail. They then state that although they have not undertaken a critical assessment on a site by site basis the housing land supply is significantly less than that set out by the council in particular it is unclear how the council has concluded on the delivery assumptions on sites in the supply, particularly for the many sites in the supply which are not in control of a housebuilder. They then go on to question the inclusion of sites without planning permission in the five year supply and point out that one site has an expired consent (11 units). Lead in times are queried, and the Council are advised to consider these on a site by site basis. The Council will also need to evidence that multiple housebuilders will be on the site from the outset. The Council should not include an empty homes allowance of 50 dwellings in the five year period, there should be robust evidence	The housing requirement should be increased to reflect the latest household projections.	The Council has considered the impact of the household projections. Addendum 2 uses the 2012HP which predicted a 15.6% increase in households over the period to 2037. The 2014HP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the plan period. The Council collected evidence on delivery rates by consulting with all of the other planning authorities in Lancashire. Also the assumptions on delivery rates and lead in times have been agreed with the SHLAA Steering Group which includes representatives from the development industry. The council has considered lead in times on a site by site basis in both the five year supply calculation and the Local Plan trajectory using the assumptions which were agreed with the SHLAA steering group. The SHLAA steering group also agreed the threshold at which more than one developer will be involved. The SHMA does consider vacant properties at Section 4.31, a count of empty homes was undertaken on 30th September 2013, those empty homes were not counted within the existing stock for the purpose of calculating the overall need for additional dwellings.

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					that there has been no double counting of empty homes. The shortfall is significantly more than that set out by the Council in its latest five year supply statement, more sites are needed to address the shortfall. There are also insufficient land allocations in the plan over the whole plan period. We consider that a flexibility allowance is required as recommended in the Local Plans Expert Group Report, in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated a five year supply could still be maintained and the overall housing requirement could be met. There is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates, Any slippage from the identified rates could result in the housing requirement not being met. This would have serious implications and the plan would be out of date, immediately following adoption.	The Five Year Supply assumptions should be evidenced. More sites are needed to address the shortfall which is greater than that set out in the Five Year Supply. A flexibility allowance of 20% should be included.	The Council contends that the five year supply calculation is correct and that at the 31st March 2016 it had a 4.8 year supply, the five year supply methodology will continue to be updated in line with emerging best practice. More sites are not needed, once the allocations are included in the supply the Council will have a five year supply throughout the plan period. Most of the sites in the plan are commitments and most of them are under construction, a flexibility requirement is not required. No change to the Plan.
Taylor Wimpey	Cushman & Wakeman	No	No	No	TWUK is concerned that the current housing requirement of a minimum of 7,768 new homes over the plan period) does not adequately address the Government's strategic priority of housing delivery, particularly in the context of compliance with NPPF paragraph 178 and evidence of joint working on this issue. TWUK do not support 370dpa as representing the OAN, nor do we support the minimum dwelling target of 7,768 dwellings over the plan period. For the	The housing requirement figure should be increased. The Council is unclear on the exact number as TWUK suggest many different reasons for an uplift, the cumulative impact of which do not come to a final number. The shortfall should be included twice, both in the	The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the period. The Experian Forecast does not forecast a fall in employment

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					reasons below the OAN is in correctly derived. Failure to use the 2014 Household Projections. Fylde is one of the fastest growing areas in Lancashire with household growth increasing by 8% from the 2012 based household projections. Employment Growth Scenarios – the Council's proposed housing requirement of 370 would only fulfil the Experian economic projections which forecast a fall in employment. On the basis of the employment evidence presented a requirement of 440 to 450 is considered to best represent the OAN for Fylde. Affordable Housing- TWUK question whether the Council has considered an increase in total housing figures in the plan where it could help deliver the number of affordable homes. Commuting-The Council should plan for new homes to accommodate the future increased local workforce – in particular more land should be allocated at Kirkham and Wesham, including their site. Market Signals – are signalling a high need for affordable housing. The rate of development demonstrates that actual supply is falling below planned supply and a more substantial uplift to the housing figure is needed. Household Formation Rates – an element of flex 10% of the OAN for the plan period must be incorporated. Younger household formation has been constrained. Household formation rates have increased due to Help to Buy and Starter Homes and should be reflected as an adjustment from	supply for the Five Year Supply Calculation and in an uplifted housing requirement figure of 420dpa. The Trajectory should be updated. There should be an early review clause and a reserve of developable sites.	Addendum 2 actually states, based on the prudent economic assumptions used in the modelling, noting this does not make a specific allowance for an improvement to unemployment rates in the authority, this would essentially support a stabilisation of levels of employment in Fylde. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. The Council does have a unique set of circumstances with respect to commuting which are described in some detail in the Housing Requirement Paper 2016 and the response to previous comments on the housing number. Actual supply refers to completions and commitments with commitments at 4228 (31.3.16) and completions for the previous year of 304. The Council is not aware of any government guidance pertaining to the 10% flex for household formation rates, the SHMA and Addendums have addressed this issue. From the SHMA, most of the household growth that is forecast for Fylde is of smaller older households of one person. As stated in the council's previous response the purpose of the Local Plan is not to meet the LEPs growth targets. There is no explicit obligation to meet the LEP growth targets through its housing number. The Council must meet its housing requirement figure and take account

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					the 2012 SNHP. Younger households are very important. In summary the Council's OAN of 370 dpa is inconsistent with their stated economic ambition, their obligation to meet their full objectively assessed needs for both market and affordable housing (significant in this case) within its boundaries and the LEP's stated sub-regional economic objectives and targets. It does not respond positively to the market signals for Fylde, nor seek to address the poor younger household formation rates. Furthermore, it does not encourage sustainable commuting patterns. Considering all of this cumulatively, it is therefore recommended that the housing requirement be significantly increased. In addition, the Local Plans Expert Group have published recommendations for revisions to the PPG which seek to provide clarification alongside a methodology for how FOAN should be calculated to ensure that a suitable demographic starting point is established, followed by uplifts to account for market signals, local affordability, household formation rates (when compared to the 2008-based projections) and affordable housing need. TWUK recommend that the Council have consideration to this proposed methodology to ensure the FOAN has had full and due consideration to all matters and suitable uplifts are applied in reaching the FOAN from the demographic starting point. TWUK support the references to the housing requirement figure being a	TWUK's site at Wesham should be included in the plan.	of economic predictions. The SHMA, Addendums 1 and 2 and the Housing Requirement Paper 2016 justify the housing requirement figure of 370dpa and take account of economic predictions. The Council notes TWUK support for the requirement to be a net minimum figure. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. The annual housing requirement figure is 370dpa for the plan period. The shortfall of 820 has been divided over the remaining years of the plan period, giving a figure of 420dpa for the remainder of the plan period. This is not the housing requirement figure which remains at 370dpa, it is wrong, and serves no purpose to calculate the 5 year land supply using 420 dpa as the shortfall is added into the requirement in the five year supply calculation, to ensure it is made up in five years, so to do this would be double counting. The Council is planning to have a five year supply throughout the plan period as demonstrated by the trajectory, once the plan is adopted and the remaining allocations are included the Council will have a five year supply. There is no guidance to say that the Council should have 20% reserve of sites, most of the site in the plan have consent

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					minimum and the reference at 10.24 to it being a net figure. A further uplift to the figure will be needed to accommodate Wyre's request that Fylde assist with their housing requirement. Due to the shortfall of 820 dwellings the housing requirement will be increased to 420dpa for the remainder of the plan period. The annual target in H1 should be amended accordingly. The Council has a 4.8 year supply of land, this should be calculated against the uplifted target of 420 giving a five year supply of 4.4 years. More housing land needs to be identified. The Council is not planning to meet its five year supply. A buffer of 20% of reserve sites should be included in line with the recommendations of the Local Plan Expert Group. TWUK have identified 8 sites where the trajectory is considered unreasonable. There should be an early review clause which will provide a mechanism for the release of developable reserve sites. Windfalls – we support the fact that the Council are not making an allowance for windfalls within the first 10 years of the plan period. The Council has not provided sufficient evidence to support a windfall allowance of 40dpa from 2021/22 onwards. It is unclear whether dwellings included in the housing trajectory as 'small sites commitments and minded to approve have had a discount applied to them to deal with non –implementation. This should be clarified. The housing supply includes an allowance for bringing back into use 50 empty properties, TWUK are unaware of any evidence to robustly demonstrate that this source of supply	Evidence the windfall allowance, evidence the fact that the empty homes allowance isn't double counting, reduce the supply from allowances and unallocated sites to 5% therefore include more sites. Remove the windfall allowance and provide a buffer.	and many are under construction. The Trajectory is considered to be an accurate picture of delivery at 31st March 2016, the progression of sites will change over time, the Council can only present its best prediction of what will happen at that time, and in doing that it took advice from the development industry. The Council does not believe it needs a reserve of developable sites. The windfall allowance of 40 dwellings per annum is considered to be a conservative estimate. From the Housing Land Availability Schedule there have been an average of 30 conversions each year since April 2011. It is likely that significantly more than 10 other completions will take place within the urban areas. Small sites commitments and minded to approve have a discount applied to them via the Five Year Supply calculation. The SHMA does consider vacant properties at Section 4.31, a count of empty homes was undertaken on 30th September 2013, those empty homes were not counted within the existing stock for the

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					would not include double counting. The Council has accrued a significant backlog, the total supply from allowances and unallocated sites should be reduced to 5%, resulting in the need for additional sites. Alternatively, the Council should follow the Selby Core Strategy approach and remove the windfall allowance and instead provide a buffer.		purpose of calculating the overall need for additional dwellings. The supply from allowances does not need to be reduced, additional sites are not needed. No change to the Plan.
Metacre Ltd.	De Pol Associates	No	No	No	It is considered that the Local Plan's 370dpa requirement fails all of the tests of soundness. The Council's selection of the 370 dpa figure fails to make adequate provision for economic growth, which based on the Council's own evidence in their SHMA Addendum 2 would need to be 440-450 dpa in order to meet economic growth objectives. Even this figure is likely to be underestimated given that it does not take full account of the published and committed investment plans of the Lancashire Enterprise Partnership and two Government designated and funded Enterprise Zones located in and immediately adjacent to the Borough. The Local Plan therefore fails to meet the aforementioned economic and social elements of sustainability advocated in NPPF and in so doing is not consistent with national policy. It is also not positively prepared as it is not based on a strategy which seeks to meet full objectively assessed development requirements. It is clear from the Council's evidence base that Fylde's affordable housing needs are acute, sustained and that affordability is a significant issue. The Council's selection of the 370 dpa figure, which is at the lowest	The housing requirement number should be higher and Metacre's sites should be included in the Local Plan. The Publication Draft Plan is not effective or justified and must be revised to meet in full all of the housing needs arising.	370 dpa represents a substantial uplift, over 50%, From the 2012 SNHP 'starting point' projection and need of 237 dpa. Noting that this does not make a specific allowance for improvements in employment rates, this would essentially support a stabilisation of employment rates in Fylde. Fylde's economy has been contracting, the Council seeks to reverse this trend. As stated in the council's previous response the purpose of the Local Plan is not to meet the LEPs growth targets. There is no explicit obligation to meet the LEP growth targets through its housing number. The Warton EZ is subject to SIC codes and therefore not available for general employment use, it is hoped that it will generate some jobs within the plan period. Likewise the EZ at Blackpool Airport has a focus on energy sector related and given its location adjacent to the built up urban area of Blackpool it is likely that many of the jobs will and should be taken up by residents of Blackpool many of who are currently unemployed. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each

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					end of the FOAN scenarios identified in their SHMA, fails to make adequate provision for meeting the Borough's affordable housing needs. This planned provision would result in a serious and significant level of under-provision of affordable housing. In so doing it fails to meet the social element of sustainability advocated in NPPF and is therefore not consistent with national policy nor is it positively prepared. Paragraph 1.24 of the Local Plan publication version states that in May 2016 Wyre Council requested that Fylde assist in meeting its objectively assessed housing need, as Wyre's supply of deliverable land is constrained by highway capacity, flood risk and Green Belt factors. However the Fylde Local Plan takes no account of the identified un-met housing needs arising from Wyre Borough Council, as highlighted to the Council in accordance with the Duty to Co-operate. This represents a fundamental flaw in the plan's preparation and raises concerns as to the lawfulness of the Plan. The Plan also fails the tests of soundness as it has not been positively prepared, in so far as it is not based on a strategy which seeks to meet unmet requirements from neighbouring authorities, nor is it effective based on effective joint working on cross-boundary strategic priorities. The Local Plan therefore fails the test of soundness and does not comply with the duty to co-operate. The planned 370 dpa requirement in policies H1 and DLF1 should be increased to adequately meet economic growth		year in order to achieve the required number of affordable homes, the council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. It is important that the adoption of Fylde's Local Plan is not delayed, Fylde Council have been advised by DCLG to progress the Local Plan to examination. With respect to the Chilmark comments the Council has not used a demographic scenario to select its Housing Figure. The housing figure represents a substantial uplift, over 50%, from the 2012 SNHP starting point' projection and need of 237dpa. The Council does refer to the lack of delivery in the past, but of more concern is the current lack of delivery, there were 4228 commitments at 31.3.16. However, completions for the previous year were only 7% of commitments. The Council has not stated anywhere that Fylde has an inability to accommodate economic growth. Fylde's economy has been contracting, the Warton EZ which was designated in 2012 has not created jobs. Fylde is unusual in that 50% of its jobs are in manufacturing, and most of these of these jobs are located close to the borough boundary with Preston. The Housing Requirement Figure selected does balance a range

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					objectives and affordable housing requirements. A firm un-met housing need figure for Wyre also needs to be identified and consulted upon before the Fylde Plan proceeds to Submission and Examination stages. Chilmark Consulting Ltd on behalf of De Pol Associates and Metacre then make a further 66 points with respect to the Housing Figure. The Council has considered these and the summary points are included below: There are three inter-related matters forming the focus of our response to the FLPP: • the identification and selection of the preferred FOAN housing requirement and particularly its justification as the planned requirement by the Council; • the relationship between economic growth objectives and the selected FOAN housing requirement; • the ability of the planned housing requirement to meet the housing needs of Fylde in full, with particular reference to the provision of sufficient affordable housing to meet identified needs. The Housing Requirement Indeed, the Council attempts, through the Housing Requirements Paper to justify the selection of the demographic-based FOAN figure in the FLPP rather than an economic-based approach for various reasons including: • the lack of delivery of new homes in the past; • the inability of Fylde to accommodate economic growth; and		of factors. The SHMA Addendum 2 does not say that the Council's own evidence would require 440 to 450 to be delivered. As stated in the Council's previous response the purpose of the Local Plan is not to meet the LEPs growth targets. There is no explicit obligation to meet the LEP growth targets through its housing number. The Council must meet its housing requirement figure and take account of economic predictions. The SHMA, Addendums 1 and 2 and the Housing Requirement paper justify the housing requirement figure of 370dpa and take account of economic predictions. The Warton EZ is subject to SIC codes and therefore not available for general employment use it is hoped that it will generate some jobs within the plan period. Likewise the EZ at Blackpool Airport has a focus on energy sector related employment and given its location adjacent to the built up urban area of Blackpool it is likely that many of the jobs will and should be taken up by residents of Blackpool many of who are currently unemployed. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the Council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8.

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					• that the FOAN selected balances economic, social and environmental factors. Economic Growth Scenarios • the selected FOAN figure and planned requirement of **370** dpa fails to make adequate provision for economic growth that, on the Council's own evidence in the SHMA *Addendum 2*, would require between **440** and **450** dpa to be delivered. • the Aecom projection was used to underpin the Council's *Employment Land Review* (ELR) and it is appropriate that this scenario should at least be used as the base alignment between the ELR and the FOAN housing figure. Indeed, the SHMA *Addendum 2* records that the upper end of the FOAN range is "*based on the considered economic position of the Council's evidence base*". • there should be further scenario modelling and testing undertaken by the Council in order to take full account of the published and committed LEP and two Enterprise Zones plans for new job growth. While this might be considered as 'policy-on', the level of funding commitment and focus is significant and there is a very strong prospect that the LEP and two EZ plans will successfully generate additional jobs in Fylde and the wider LEP Arc of Opportunity above those projected to date. It is wholly appropriate that these investments are fully taken into account in determining a new FOAN and planned housing requirement for Fylde that meets economic growth objectives. Affordable Housing Provision • the FLPP selected FOAN planned requirement figure of **370** dpa fails to make adequate provision for meeting Fylde's affordable housing needs. The level of		

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					affordable housing resulting from such an FOAN will be wholly insufficient to meet identified needs; • the level of affordable housing that would be met with the policies set out in the FLPP is less than half of the Council's own estimated affordable housing need; and • the FLPP is therefore flawed in this respect and an alternative, higher FOAN planned requirement is necessary in order to secure sufficient affordable housing. Also the plan fails to account for the identified un-met housing needs arising from Wyre District as highlighted to the council in accordance with the Duty to Cooperate. For these reasons, it is concluded that the FLPP policies for housing and the Council's rationale and justification for selection of a 370 dpa OAN figure are **unsound** and potentially unlawful with regard to the lack of support for Wyre's identified un-met housing needs in accordance with the Duty to Cooperate. The Publication Draft Plan is therefore not effective or justified and must be revised to meet in full all of the housing needs arising.		Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. It is important that the adoption of Fylde's Local Plan is not delayed, Fylde Council have been advised by DCLG to submit the plan for examination. The Council does not agree with Chillmark's conclusions. No change to the Plan.
Hollins Strategic Land		No	No	No	The introductory paragraphs to this policy confirm that the eLP supply only "*provides a small amount of headroom above the housing requirements for the Plan period*" (para. 10.17). As previously stated, this is not sufficient and the eLP should provide a greater buffer. Paragraph 10.21 confirms that the "*Council is allocating previously developed sites first,*	A greater amount of headroom – amount not specified. Change the plan so that it does not give priority to PDL.	A larger buffer (headroom) is not needed the plan is deliverable. Para 17 of the NPPF 8th bullet – planning should encourage the effective use of land by reusing land that has not been previously developed (brownfield land) provided it is not of high environmental quality.

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					but there is an insufficient supply of such land". This again demonstrates the eLP approach prioritises PDL in a way that does not accord with the NPPF. Part c) of policy H1 refers to the need to ensure that there is a deliverable land supply. It is considered necessary that the eLP confirms that a Review of the LP will take place if the deliverable supply is such that one is warranted. This is particularly important given the issues surrounding the WC OAN and the likelihood that FBC will need to assist WC. It would be sensible for the eLP to confirm that a Review will take place once the WC evidence base has been completed, if it is shown that FBC should assist WC. Part d) of policy H1 states that developable sites will provide "*a total of 7,891 homes*". This should be amended to state "a minimum of 7,891 homes".	The plan should commit to a review if the supply is not being delivered and if Wyre's evidence shows that they cannot meet their needs.	The plan is being delivered it does not need to contain a commitment to an early review. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. **MODIFICATION no MNR026** The Council agrees that the policy should be amended to include the word minimum with respect to the total of 7,891 homes.
Wainhomes Developments Ltd	Emery Planning	No	No	No	Requirement-The Fylde Coast SHMA (2014) set out a range of a range of economic scenarios, two of which (AECOM and Oxford Economics) indicate a requirement in excess of 400 dwellings per annum. The Oxford Economics scenario represents a 'policy-off', integral part of the OAN. However even if it is accepted that the OAN is 370 dwellings per annum, the AECOM 'policy-on' scenario indicates that the Council should be increasing the requirement in order to align housing growth with its economic policy and ambitions. We therefore cannot see why a higher requirement in the order of 420	The Housing Requirement Figure should be 420dpa. The Housing Requirement Figure should make an allowance for C2 and Specialist accommodation and extra land should be provided accordingly.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The SHMA did include the housing requirements of older persons. The only group it did not include were older persons living in nursing homes at the time of the study – para 10.11. Therefore, the housing requirement

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					dwellings per annum has not been pursued. It is also apparent that the housing requirement figure does not make any allowance for the need for C2 and specialist accommodation. This is despite a very substantial need, as described at paragraphs 10.40 to 10.48 of the draft plan. The need for C2 and other specialist accommodation can either be incorporated within the overall housing requirement (similar to the approach taken in the emerging Cheshire East Local Plan) or set out as a separate requirement (similar to the approach taken in the emerging Cornwall Local Plan). Either way it must be accounted for in the plan and sufficient land allocated accordingly. Wainhomes then describes the Five Year Housing Land Supply methodology in some detail and appear to agree with the methodology. They then state it is unclear how the council has concluded on the delivery assumptions on sites in the supply, particularly for the many sites in the supply which are not in control of a housebuilder. Wainhomes then goes on to question the inclusion of sites without planning permission in the five year supply and points out that one site has an expired consent (11 units). Lead in times are queried, and the Council are advised to consider these on a site by site basis. The Council will also need to evidence that multiple housebuilders will be on the site from the outset. The Council should not include an empty homes allowance of 50 dwellings in the five year period, there should be robust evidence that there has been no double counting of empty homes. The shortfall is significantly more than that	The Five Year Land Supply is queried and changes are requested. The Council should revisit it and remove the empty homes allowance. More sites should be	figure does include the need for specialist and C2 accommodation. Also although specialist and C2 accommodation has been completed since the commencement of the plan period, the Council has not counted these completions as part of the supply. The Council has collected evidence on delivery rates by consulting with all of the other planning authorities in Lancashire. Also the assumptions on delivery rates and lead in times have been agreed with the SHLAA Steering Group which includes representatives from the development industry. The council has considered lead in times on a site by site basis in both the five year supply calculation and the Local Plan trajectory using the assumptions which were agreed with the SHLAA steering group. The SHLAA steering group also agreed the threshold at which more than one developer will be involved. The SHMA does consider vacant properties at Section 4.31, a count of empty homes was undertaken on 30th September 2013, those empty homes were not counted within the existing stock for the purpose of calculating the overall need for additional dwellings. The Council contends that the five year supply calculation is correct and that at the 31st March 2016 it had a 4.8 year supply, the five year supply methodology will continue to be updated in line with emerging best practice. More sites are not needed, once the allocations are included in

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					set out by the Council in its latest five year supply statement, more sites are needed to address the shortfall. There are also insufficient land allocations in the plan over the whole plan period. We consider that a flexibility allowance is required as recommended in the Local Plans Expert Group Report, in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated a five year supply could still be maintained and the overall housing requirement could be met. There is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates, Any slippage from the identified rates could result in the housing requirement not being met. This would have serious implications and the plan would be out of date, immediately following adoption.	included including Wainhomes' site. A 20% flexibility allowance should be included.	the supply the Council will have a five year supply. Most of the sites in the plan are commitments and most of them are under construction, a flexibility requirement is not required. No change to the Plan.
Rushcliffe Properties Ltd (In liquidation) c/o Ideal Corporate Solutions	Emery Planning	No	Yes	No	In our representations to the December 2015 Preferred Approach we had no specific comments to make on the proposed requirement as there have been a number of factors which have resulted in an uplift from the demographic starting point. Since then, the major change is the publication of the household projections. These increase the household projections from 219 households to 237 households which is an 8% increase. This increase to the starting point for determining the Objectively Assessed Need must be considered and in our view would require an uplift to the housing requirement.	The Housing Requirement Figure should be 420 dpa. The Housing Requirement Figure should make an allowance for C2 and specialist accommodation and extra land should be provided accordingly. There should be an uplift to the Housing Requirement Figure to provide more affordable housing. The Five Year Supply calculation is queried and amendments are requested.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Housing Requirement Figure does include the needs of elderly people. The only group the SHMA doesn't include are elderly people living in nursing homes at the time the study was carried out. Therefore, an extra allowance on top of the housing

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					The Fylde Coast SHMA (2014) set out a range of economic scenarios, two of which (AECOM and Oxford Economics) indicate a requirement in excess of 400 dwellings per annum. The Oxford Economics scenario represents a 'policy-off', integral part of the OAN. However even if it is accepted that the OAN is 370 dwellings per annum, the AECOM 'policy-on' scenario indicates that the Council should be increasing the requirement in order to align housing growth with its economic policy and ambitions. We therefore cannot see why a higher requirement in the order of 420 dwellings per annum has not been pursued. It is also apparent that the housing requirement figure does not make any allowance for the need for C2 and specialist accommodation. This is despite a very substantial need, as described at paragraphs 10.40 to 10.48 of the draft plan. The need for C2 and other specialist accommodation can either be incorporated within the overall housing requirement (similar to the approach taken in the emerging Cheshire East Local Plan) or set out as a separate requirement (similar to the approach taken in the emerging Cornwall Local Plan). Either way it must be accounted for in the plan and sufficient land allocated accordingly. Finally, the Satnam Judgment clarifies that an uplift to the requirement is considered to meet the need for affordable housing. In Fylde the need is extremely high (247dpa), and would not be met by the proposed housing requirement. We therefore consider that the requirement should be uplifted further to further address the significant shortfall for affordable housing. Ideal Corporate Solutions then describes	The Council should revisit it and remove the empty homes allowance. More sites should be included. A 20%	requirement number does not need to be included. Also although specialist and C2 accommodation has been completed since the commencement of the plan period, the Council has not counted these as part of the supply. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. The Council has collected evidence on delivery rates by consulting with all of the other planning authorities in Lancashire. Also the assumptions on delivery rates and lead in times have been agreed with the SHLAA Steering Group which includes representatives from the development industry. The Council has considered lead in times on a site by site basis in both the five year supply calculation and the Local Plan trajectory using the assumptions which were agreed with the SHLAA steering group. The SHLAA steering group also agreed the threshold at which more than one developer will be involved. The Council does include an allowance for 50 empty homes in its five year supply calculation. The SHMA does consider vacant properties at Section 4.31, a count of empty homes was undertaken on 30th September 2013, those empty homes were not counted within the existing

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					the Five Year Housing Land Supply methodology in some detail and appear to agree with the methodology. They then state it is unclear how the council has concluded on the delivery assumptions on sites in the supply, particularly for the many sites in the supply which are not in control of a housebuilder. Ideal Corporate Solutions then goes on to question the inclusion of sites without planning permission in the five year supply and points out that one site has an expired consent (11units). Lead in times are queried, and the Council are advised to consider these on a site by site basis. The Council will also need to evidence that multiple housebuilders will be on the site from the outset. The Council should not include an empty homes allowance of 50 dwellings in the five year period, there should be robust evidence that there has been no double counting of empty homes. The shortfall is significantly more than that set out by the Council in its latest five year supply statement, more sites are needed to address the shortfall. There are also insufficient land allocations in the plan over the whole plan period. We consider that a flexibility allowance is required as recommended in the Local Plans Expert Group Report, in the order of 20%. This would give a reasonable degree of security that should sites not deliver at the rates anticipated a five year supply could still be maintained and the overall housing requirement could be met. There is insufficient flexibility to deal with changing circumstances, specifically a failure to deliver housing at the anticipated rates, Any slippage from the identified	flexibility allowance should be included.	stock for the purpose of calculating the overall need for additional dwellings. The Council contends that the five year supply calculation is correct and that at the 31st March 2016 it had a 4.8 year supply, the five year supply methodology will continue to be updated in line with emerging best practice. More sites are not needed, once the allocations are included in the supply the Council will have a five year supply. Most of the sites in the plan are commitments and most of them are under construction, a flexibility requirement is not required. No change to the Plan.

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					rates could result in the housing requirement not being met. This would have serious implications and the plan would be out of date, immediately following adoption.		
The Rigby Group	PWA Planning	Not specified	Not specified	No	It is considered that the housing requirement figure of a minimum of 370 dwellings per annum set out in Policy H1 will not ensure that the needs of the Borough are adequately met through the plan period. It is considered that the figure should be increased to at least the upper figure set out in the Fylde Coast Strategic Housing Market Assessment (FCSHMA). Such a higher minimum figure is consistent with guidance in NPPF and would ensure that growth is not constrained within the Borough. This is particularly the case given that the authority does not suffer from any significant strategic constraints which would severely impact the delivery of increased numbers of housing. The need to increase the minimum housing requirement figure is reinforced by the fact that Wyre Council has sought assistance from Fylde Council (May 2016), under the Duty Cooperate, in meeting its objectively assessed housing need. The Objectively Assessed Need figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA and its updates which considered revised population and household formation data. For Wyre Council this gave an objectively assessed need of between 400 and 479 dwellings per annum from 2011 to 2031. Wyre Council considers 479 dwellings per annum to be an appropriate housing requirement figure which ties in with the	Policy H1 should be amended to include an increased minimum housing requirement figure of no less than 420 dwellings per-annum.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. No change to the Plan.

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					economic evidence and this figure was accepted by Wyre Council on 14th April 2016 (Paragraph 1.25 of the Draft Plan). Wyre Council has identified that the supply of deliverable land is constrained by three main issues; highway capacity, flood risk, and; green belt. Despite this request and notwithstanding that precise proportion of its housing that Wyre will be unable to provide for within its own boundaries, Fylde Council have sought to set a housing requirement figure below the SHMA derived upper limit. This is considered to be inappropriate and unjustified and likely to result in Fylde Council being unable to meets its own housing needs, and certainly not any of those from Wyre Council. It is therefore considered that the local plan is **unsound** on the basis that it is not **"positively prepared"** nor will it be **"effective"** in meeting needs, consistent with achieving sustainable development and ensuring effective joint working on cross-boundary housing issues.		
Persimmon Homes		Not specified	Not specified	Not specified	Persimmon Homes Lancashire are grateful for the opportunity to respond to the consultation on the Publication Version of the Fylde Local Plan. Persimmon support the amendments made following our previous comments on the Strategic Objectives. We appreciate that the intervening time from the Issues and Options has been used productively to update much of the evidence base. We note the recent release of the 2014 population projections and assume that	Updated evidence, the housing number should be increased to provide more affordable housing.	The Council has considered the impact of the household projections. Addendum 2 uses the 2012HP which predicted a 15.6% increase in households over the period to 2037. The 2014HP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the plan period.

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					the evidence will again be updated accordingly in due course. In addition, we note the Wyre have requested that Fylde consider taking some of their housing numbers. Some further clarification is required on this. We also remain concerned that the housing figure identified does not provide the opportunity to meet the affordable housing demand identified in the evidence base. It is felt that further commentary is required on this matter.		Wyre Council have not been able to specify the scale or location of development required, Fylde Council will continue to work with Wyre Council in accordance with the Duty to Cooperate. The Council has considered the supply of affordable housing. 823 new dwellings would have to be built each year in order to achieve the required number of affordable homes, the Council considers this completely unrealistic given that the highest ever number of dwellings constructed was 394 in 2007/8. No change to the Plan.
Carrington Group	Johnson Mowatt	Not specified	Not specified	Not specified	Carrington Group supports the evidence presented by the HBF in respect to the Fylde Objectively Assesses Housing Need (OAN). The proposed housing requirement is too low and does not align with the economic strategy within the plan, nor will it meet the affordable housing needs of the area. Carrington Group also remain concerned that the housing implications of the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs over the period 2015 to 2025 LEP Strategic Economic Plan is not fully addressed in the 'Statement of Compliance with the Duty to Co-operate' or the plan. Carrington Group agree with an HBF recommendation that increases the housing requirement be increased towards	The Housing Requirement Figure should be increased to 440-450dpa net.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. As stated in the Council's previous response the purpose of the Local Plan is not to meet the LEPs growth targets. There is no explicit obligation to meet the LEP growth targets through its housing number. The Council has considered the impact of the household projections. Addendum 2 uses the 2012SNHP

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					the upper end of the objectively assessed needs range identified in the SHMA addendum 2, 440 to 450dpa (net). The scenarios should also be re-run using the 2014 based SNHP as their stating point. The Council's latest 'Five Year Housing Land Supply Statement' published 18 May 2016 indicates the Council has a 4.8 years housing land supply (at 31 March 2016). This is based upon a 20% buffer, as required by the Framework, and dealing with under-delivery in the first five years. Whilst the methodology to identify the five year supply is considered correct and in compliance with the Framework and PPG the input of 370dpa, as the appropriate housing requirement, is disputed as above. A housing requirement in the order of 440 to 450dpa would mean an overall housing requirement of between 9,240 and 9,450 net additional dwellings. The supply currently falls some way short of this need. To ensure that the plan can be found sound at examination it is imperative that the Council provide an adequate supply of housing land to enable a five year supply to be demonstrated.		which predicted a 15.6% increase in households over the period to 2037. The 2014SNHP predict a 16.6% increase in households to 2039. The difference is 1% which is not considered to be significant over the plan period. More sites are not needed, once the allocations are included in the supply the Council will have a five year supply throughout the plan period. Most of the sites in the plan are commitments and many of them are under construction. No change to the Plan.
Britmax Developments	Indigo Planning Ltd	Yes	Not specified	No	We object on the basis that the Council will need to deliver more than a minimum of 7,768 new homes over the plan period. From a review of the council's reported supply and the persistent under-delivery of housing over the past number of years, we consider the housing land supply position to be lower than the current council estimates.	An increase in the supply of land.	The Council disagrees; the plan is being delivered, more land it not needed. No change to the Plan.
Greenhurst Investments	Indigo Planning	Not specified	Not specified	Not specified	We object on the basis that the Council will need to deliver more than a minimum of	The housing number should be increased.	The Council has evidenced the Housing Requirement Figure of

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					7,768 new homes, but considerably less than 60.6ha of gross employment development over the plan period to 31 March 2032. The Council has not for some time been able to demonstrate a five year housing supply. We have undertaken a more detailed assessment of sites and we consider the supply to be more in the region of 3.6 years. The position is exacerbated by the fact that Wyre Council has requested that Fylde Council help meet its objectively assessed need. This will result in Fylde needing to find more sites for housing. The emerging draft plan housing requirement is yet to be tested at examination and should the annual requirement increase, this would reduce the supply position even further.	More sites should be included.	370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Council contends that the five year supply calculation is correct and that at the 31st March 2016 it had a 4.8 year supply, the five year supply methodology will continue to be updated in line with emerging best practice. More sites are not needed, once the allocations are included in the supply the Council will have a five year supply. Most of the sites in the plan are commitments and most of them are under construction, no more sites are needed. No change to the Plan.
CAPOW		No	No	No	It is a GREAT pity that many of the proposals were not implemented from earlier drafts as they are clearly to be policy. This could have prevented extensive "large house" developments in rural villages, which are not in accord with these policies. Given the two large sites approved and coming on stream (Queensway and Whyndyke) it makes total sense to spread the housing backlog over the plan period immediately. The sub-regional ONS for 2014 shows an expected reduction in population or at minimum of flat population growth. FBC	Emerging policies should have been used sooner to prevent large executive developments in the villages. The Liverpool Method should be used for the plan. All approved land should be fully developed within five years.	Emerging policies gain weight as the plan is produced. They could not be used for DM purposes in the early stages of plan production. The Liverpool Method is used to spread the shortfall over the plan period. The 2014SNHP are showing that the number of households will continue to grow at a similar rate to that predicted by the 2012SNHP, therefore the SHMA remains a sound piece of evidence. The Council have to use ONS data, in particular the household projections, as a starting point they cannot wait for growth to happen.

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					want to go for growth to service the aging population BUT why not await proven growth need and adjust the Local Plan accordingly. More approvals do NOT mean greater numbers of properties being developed, this requires a serious rethink.		The Council agrees more commitments do not result in more completions. However, it would not be possible for all development to be completed within 5 years, houses do not sell that quickly and builders will not build unless they know they can sell. No change to the Plan.
CAPOW		No	No	No	Why has it been necessary to swamp the rural Fylde in housing contrary to this emerging policy. There are areas where it has been difficult to fill affordable housing therefore the need cannot be as great as has been indicated. Para 10.16 applications have been consented without affordable housing, infrastructure, traffic calming or services improvement.	Why weren't emerging policies used sooner?	Emerging policies gain weight as the plan is produced. They could not be used for DM purposes in the early stages of plan production. The adoption of the plan has been delayed which has meant applications have been approved at appeal meaning that a comprehensive approach to development at smaller settlements has not been possible. Policy M1 of the plan does address these issues. No change to the Plan.
Minority Group - Liz Oades		Not Specified	Not Specified	Not Specified	The local demographics, as far as Fylde is concerned, show a net loss in housing need figures as more people die in Fylde than are born. We are also of the opinion that the fragmentation of households in Fylde is not as great as is shown. We believe the original and subsequent Fordham Housing Need Assessment overstated and inflated real housing need. We assert that we should not have to lose too much of our green fields to accommodate inward migration. This is a political decision and it's perfectly right	A reduction in the housing requirement figure.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged. The Council agrees commitments are high, 65% of the supply identified in the Local Plan has planning consent, completions did increase to 304 15/16

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					that that residents should take a view as to how much land they want to lose. The most recent ONS base figures are now available from a recent start point there is no need to include shortfall. All age average household size to convert to households can be replaced by a model which predicts the shift towards elderly residents who live in significantly smaller households. All of these aspects undermine the mathematical base and demonstrate that the housing need figures are massively overstated. The Five Year Supply relies on build out rates, permissions are already in place which more than cover and well exceed a 5 year supply. The Government is looking to produce a policy on "Land Banking" at the moment. This effectively is what is happening in Fylde Borough. If there was a huge need for housing, these permissions would have been taken up and built.		but were still only 7% of commitments. No change to the Plan.
Anthony Guest		Not Specified	Not Specified	Not specified	The Housing Requirement Figure has not been objectively and soundly selected. The selection of 370 on the basis of a need to support additional employment was arbitrary and unsound because the Council's understanding of current and future employment needs is demonstrably poor. The economy is shrinking. Insufficient consideration has been accorded to the extensive evidence that there will not be substantial growth of	The housing requirement should be reduced from 370dpa to 195dpa.	The household projections published by DCLG provide the starting point estimate of overall housing need. For Fylde, the 2012SNHP project an increase of 4,641 households over the period 2011-2032, an equivalent to an average of 221 new households per annum over this period, this is translated into a modelled need for 237 dwellings per annum. A figure of

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					employment in Fylde. A more soundly reasoned and evidentially based number of 195 dwellings per year was produced in a letter to the local MP, Mark Menzies from Cllr Fiddler and David Eaves on 13th August 2013 (ref AO/RLSA01). There has been a historic shortfall in dwelling completions compared to plan requirements. The matter is complicated and not well addressed in the Local Plan Publication Version.		195 does not satisfy this starting point estimate. The Council agrees that there has been a historic shortfall of completions, completions were 7% of commitments in 2015/16. No change to the Plan.
Fred Moor		Not specified	Not specified	No	*"The Local Plan will deliver a minimum of 7,768 new homes and land will be developed for a minimum of 60.6 Ha (gross requirement) of employment use over the plan period to 31st March 2032."*I believe the statement to be unsound because although the base information and evidence from which these numbers are derived is generally sound and well prepared, Fylde's inappropriate Vision has caused the wrong conclusions to be derived from that data. I argue that the housing need in Fylde is less than 5,000 homes over the plan period and I will be pleased to explain the basis for this assertion further at the Inquiry. The plan is unsound because it's assumed need of 420 (unpenalised 370) dwellings a year is grossly inflated, as is the need for 249 affordable houses. The plan is based on an incorrect interpretation of the housing need figures and a fallacious prediction of the need for employment land, which is in turn based on a Vision. A Vision is not evidence, it is not even a forecast it is a desire. The plan is unsound because its foundations are unsound. The SHMA showed the projected number of	The housing figure for Fylde should be reduced to less than 5000 dwellings over the whole plan period.	The Council has evidenced the Housing Requirement Figure of 370dpa in the Housing Requirement Paper 2016 (which also includes the Council's response to the first consultation on the Housing Requirement Figure Appendix 3 pages 41-44). The Council's position remains unchanged.

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					dwellings needed lay between -64 and + 436 a year depending on how one defines need and the assumptions made. The former Council Leader and Former Portfolio Holder for Planning and Development have produced evidence to show that over the last 10 years 195dpa (including the 20% buffer) had more than met Fylde's need. The former Lancashire Structure Plan figure was 155 dpa. The evidence needs to be re- examined and reinterpreted to remove historic errors that have been carried forward to the present SHMA, and to establish sound housing numbers that are informed by real evidence, not by an unrealistic vision, which is pursuing a desire for growth not evidence based.		
H2 – Density and Mix of New Residential Development							
Home Builders Federation		Not specified	Not specified	No	Density – given the history of densities of new developments it is recommended that the policy provide flexibility and identifies that lower density developments will also be acceptable. Mix – The HBF therefore recommend that whilst the SHMA may be useful, reference to local needs at the time of the development, the market and viability should also be included.	Policy to be amended to allow flexibility and lower density developments. There should be reference to local needs at the time of the development. Clarification as to whether all properties need to meet the optional technical standard M4(3A).	The Council does not agree that the density requirement should be more flexible. The requirements for densities applies to the whole residential part of the site. Areas of lower- density development within a large site can therefore be counterbalanced by higher-density areas providing, for instance, starter homes or accommodation for the elderly. The acceptability of detailed variation in density within sites should consider the requirements of policies of M1 and GD7. The policy states that the mix required will be adjusted according to updated future Housing Needs Assessments over the plan period. Viability is relevant and the council's evidence reveals that the plan is viable. The

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					Specialist Accommodation for the Elderly – whilst reference to the optional technical standard M4(3A) is noted the text is unclear if all such properties would need to meet this standard. As noted with our comments on Policy GD7 we do not consider that the Council has provided sufficient evidence to include the optional standards in compliance with the PPG (paragraph 56-007). The policy is ambiguous and should include reference to the types of accommodation deemed appropriate to meet the needs of the elderly within the supporting text, this should also include properties which are adaptable as well as those already adapted.		council does not consider that the market should be referenced, developers will always aim to maximise profits and this does not necessarily result in the types of homes needed. The text of the policy makes clear that homes specifically designed to accommodate the elderly should be compliant with standard M4(3A). However, the policy incorrectly refers to standard M4(3A) as wheelchair-accessible dwellings: it should refer to wheelchair-adaptable dwellings. There is no intention that homes designed specifically for the elderly should necessarily be wheelchair-accessible immediately on completion. The Specialised Housing Background Paper provides supporting evidence for inclusion of the standard, based on the demographic trends in the borough. **MODIFICATION no MNR027**
Story Homes Ltd.	Barton Willmore	Not Specified	Not specified	Not Specified	Density - Our client maintains that the policy, in its current form, fails to allow for the consideration and form and character of individual settlements. It is recommended that paragraph 1 is either re-worded to allow enough flexibility to justify different densities or, alternatively, the Council prepares a credible up-to-date evidence base to justify the proposed requirement for each settlement.	H2 should be reworded to allow a range of densities alternatively there should be an evidence base to justify the proposed requirement for each settlement. The emphasis should not be on small family homes. Mix should only be determined at the time of the planning application.	The Council disagrees, the density requirement should not be more flexible. The requirements for densities applies to the whole residential part of the site. Areas of lower- density development within a large site can therefore be counterbalanced by higher-density areas providing, for instance, starter homes or accommodation for the elderly. The acceptability of detailed variation in density within sites should consider the requirements of policies of M1 and GD7. The Council does not need to prepare evidence on the

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					Mix - Our client objects to the emphasis on small family homes. The emphasis placed on this type of dwelling in the policy wording has the potential to delay the delivery of housing in sustainable locations. Our client suggests that the exact mix of housing should be set at the time of a planning application being made or permission granted to allow the mix to be based on the most up to date evidence available to meet local needs.		proposed density for each settlement. Houses of all sizes should be provided at all sites, the need as evidenced by the SHMA is mainly for small dwellings. Mix – the policy does not mention small family homes. It states that a broad mix of types and sizes of homes, suitable for a broad range of age groups, will be required on all sites to reflect the demographics and housing requirements of the borough. This is considered to be entirely appropriate. The change suggested would introduce uncertainty, the council has used its evidence to write a policy which will deliver the types of housing needed in Fylde. No change to the Plan.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Whilst it is important that specialist accommodation for the elderly is provided in sustainable and accessible locations, consideration should also be given to the need for this type of accommodation to be located in an attractive and tranquil setting. There should be flexibility within the policies as to the final layout and design of such accommodation. This will enable proposals to reflect the site and its surroundings and effectively manage any site constraints. The list of criteria in the emerging policy H2 should, therefore, be a recommendation rather than an exact requirement. Great Birchwood is therefore, ideal to accommodate elderly person accommodation.	Amend Policy H2 to make the criteria for specialist accommodation for the elderly a recommendation rather than a requirement. Identify Great Birchwood as a site for Specialist Accommodation for the Elderly.	The criteria in Policy H2 for specialist accommodation for the elderly are crucial in order to deliver sustainable development. The location of development for the elderly should be determined in accordance with the development strategy, the location of this site does not accord with the development strategy. No change to the Plan.

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Gladman Developments		Not specified	Not Specified	Not specified	Mix – the standards set in this policy should allow for flexibility and the wording 'subject to viability' should be included in the proposed mix.	Mix - the wording 'subject to viability' should be included in the proposed mix.	The plan has been subject to Viability testing and the policy requirements are viable. No change to the Plan.
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	Density – no evidence has been provided at this stage. The policy should include an element of flexibility by including the word 'normally'. The desirability for 'executive style' housing to attract and retain workers to BAE Systems and the EZ should be considered. Mix - HLM support the fact that the mix will need to be updated in line with future Housing Needs Assessments. We recommend that some flexibility is built into the requirement for 50% of dwellings to be 1-3 bed to respond to site characteristics and market conditions, and with respect to Warton and executive housing for skilled workers. Specialist Accommodation for the Elderly – HLM cross reference their comments on Policy GD7 part n (sections 7.3-7.8), which note that Fylde have not provided sufficient evidence to justify the imposition of this policy, and therefore we recommend that reference to M4(3A) is removed until sufficient evidence is provided. We also recommend that further clarity is provided on what would constitute elderly accommodation and suggest that it includes dwellings that are adaptable to elderly needs, rather than ready adapted, to provide additional flexibility.	Density - The policy should include an element of flexibility by including the word 'normally'. Mix – some flexibility should be built into the policy. The reference to M4(3A) should be removed until evidence has been provided. Clarity on elderly accommodation should be provided and the policy should allow for accommodation that is adaptable rather than already adapted.	The inclusion of the word 'normally' introduces uncertainty. The policy is clear and does not need amending. Again the required mix is clear, and is evidenced by the SHMA. Table Six of the Local Plan shows that 76% of new properties should be three bed or less. The Council has reduced the requirement to 50% for developments of 10 or more dwellings with developments within or in close proximity to the Tier 1 and Tier 2 Rural Settlements expected to include 33% 1 or 2 bedroom dwellings. Para 10.38 concludes the appropriate mix of development may change during the plan period, due to differences in projected population and migration trends from those predicted in the SHMA. The mix required will therefore need to be informed by updated assessments of housing need during the course of the plan period. The Specialised Housing Background Paper, and supporting text to the policy, explain the clear need for specialised elderly accommodation in Fylde. However, the policy should read "wheelchair-adaptable". **MODIFICATION no MNR027**

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Metacre Ltd.	De Pol Associates	Not specified	Not specified	No	It simply isn't appropriate, possible or even necessary to try to identify a dwelling mix to be applied to all residential development in the whole of the Borough. The need for this requirement is questioned given that paragraph 10.30confirms that the average profile of the housing stock is broadly typical for England. The policy should be deleted as a reasonable alternative would be to allow the dwelling mix to be considered on a site by site basis.	Delete the section of H2 on mix and allow the dwelling mix to be considered on a site by site basis.	The required mix is clear, and is evidenced by the SHMA. Table Six of the Local Plan shows that 76% of new properties should be three bed or less to provide the mix of home sizes needed according to the SHMA. The Council has reduced the requirement to 50% for developments of 10 or more dwellings with developments within or in close proximity to the Tier 1 and Tier 2 Rural Settlements expected to include 33% 1 or 2 bedroom dwellings. The mix required will be informed by updated assessments of housing need during the course of the plan period.
Oyston Estates	Cassidy & Ashton	Yes	Yes	No	Policy H2 is too prescriptive in terms of its approach to the elderly. Policy H2 should be revised as follows: All developments of 10 or more dwellings *should consider* the inclusion of at least 50% of dwellings that are 1-,2- or 3 bedroom homes. Developments within or in close proximity to the Tier 1 Larger Rural Settlements or Tier 2 Smaller Rural settlements should *consider the inclusion of* at least 33% 1- or 2-bedroom homes.	Policy H2 should be amended so that all the mix requirements should be considered rather than required.	The policy as written is clear and well justified. The amendments suggested would remove the requirement and render the policy impotent. The required mix is clear, and is evidenced by the SHMA. Table Six of the Local Plan shows that 76% of new properties should be three bed or less to provide the mix of home sizes needed according to the SHMA. The Council has reduced the requirement to 50% for developments of 10 or more dwellings, with developments within or in close proximity to the Tier 1 and Tier 2 Rural Settlements expected to include 33% 1 or 2 bedroom dwellings. The mix required will be informed by updated assessments of housing need during the course of the plan period.

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					In order to meet the needs of an ageing population in Fylde, at least 20% of homes within residential developments of 20 or more homes should *consider the option* of being designed specifically to accommodate the elderly, including compliance with optional technical standard M4(3A)(wheelchair- accessible dwellings), unless it is demonstrated that this would render the development unviable.		
Hollins Strategic Land LLP		No	No	No	The policy and justification should explain the technical standard M4(3A)in more detail. The policy should acknowledge that M4(3A) may be replaced in future by another standard. Development on Garden Land – the stringent caveats should be set out. With respect to Tier 1 and 2 settlements including at least 33% 1-and 2- bedroom homes – this has not been fully justified or viability tested, and has the amount of development in each settlement has taken account of this approach.	Technical standard M4(3A) should be explained in more detail, and it should be acknowledged that it may be replaced by another standard. The stringent caveats should be set out The requirement for smaller homes should be justified, viability tested and should take account of the amount of development in each settlement.	Planning Practice Guidance on Housing – Optional Technical Standards provides links to all of the relevant standards documents The caveats relate to design, character, access, amenity and other issues deemed appropriate by the council, as stated in the policy. The required mix is clear, and is evidenced by the SHMA. Table Six of the Local Plan shows that 76% of new properties should be three bed or less to provide the mix of home sizes needed according to the SHMA. The Council has reduced the requirement to 50% for developments of 10 or more dwellings, with developments within or in close proximity to the Tier 1 and Tier 2 Rural Settlements expected to include 33% 1 or 2 bedroom dwellings. The mix required will be informed by updated assessments of housing need during the course of the plan period.

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							The policy requirements of the plan have been viability tested and this work did take account of the amount of development at each settlement.
Persimmon Homes		Not specified	Not specified	No	Persimmon Homes do not feel that this policy in its current form, in relation to 'Specialist Accommodation for the Elderly' is sound. The policy is not justified in requiring compliance with an optional technical standard (M4 (3A) (Wheelchair-accessible dwellings)). This sits against the Housing Standards Review, and runs against recent Government statements and the Deregulation Bill.	Policy should not require compliance with the an optional technical standard (M4)(3A).	Where accommodation is included on development sites to provide for the needs of the elderly, it needs to be genuinely suitable for that purpose, and therefore compliant with optional technical standard M4(3A). However, the accompanying text should refer to "wheelchair-adaptable dwellings" rather than "wheelchair-accessible". **MODIFICATION no MNR027**
Keith Halliwell	Mr Booth	Not specified	Not specified	Not specified	The policy is incredibly prescriptive and has the potential with H4 and ENV4 to restrict development from being delivered. This makes the Local Plan ineffective. Only the larger significant or strategic sites should be considered relevant for all of these policies relating to new housing. What assessment has the Council done regarding the amount of land required to deliver, for example, a site of fifteen new dwellings against these policies. Such cumulative restrictions on sites of up to a few hectares would reduce the rate of overall housing delivery by making them unattractive to developers at a time when the council needs to increase delivery.	The requirements in H2 should only be applied to the larger significant or strategic sites.	The policy requirements of the plan have been viability tested. The plan is viable. The Viability Assessment concludes - the overall scale of obligations, standards and policy burdens contained in the emerging Local Plan are not of such a scale that cumulatively they threaten the ability of sites and scale of development identified in the plan to be developed viably. No change to the Plan.

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Policy H3 Conversions and Changes of Use to Residential							
Fred Moor		Not specified	Not specified	No	The southern and central areas of Blackpool have an excess of smaller hotel property that is damaging its tourism industry because the number of bed spaces exceeds demand for almost the whole year, standards have declined and reinvestment from profits is impossible. The travel to work area and housing market areas operate across Local Authority Boundaries, the southern part of Blackpool is closer to Fylde's most populated areas than many of the rural parts of Fylde. It follows that, if Fylde has an excess of housing demand – especially for low cost of affordable housing, with the most acute shortage in the main urban areas, and if Blackpool has an excess of smaller run down property that is easily capable of adaption for sale or for re development as affordable housing, then the problems of both councils have a single solution if Fylde had successfully persuaded or pursued Blackpool to recognise its duty to cooperate across boundaries by agreeing to release unprofitable and poor quality accommodation for redevelopment or adaption to housing to meet Fylde's needs. I have seen no evidence of this in Fylde's Local Plan that this approach has been pursued, and I regard this as an omission which is causing more agriculture land in Fylde to be taken for development than would have been the case. I thus argue that the absence of a policy to pursue this aim renders the plan unsound.	There should be a policy to pursue the aim that smaller hotel property in Blackpool should be converted or redeveloped to provide low cost homes/affordable housing to meet Fylde's need.	Blackpool also has a requirement to provide affordable homes, which is 272 affordable dwellings per annum. Fylde's need for 247 affordable dwellings per annum is to meet need arising in Fylde. Fylde residents in need of affordable housing should be able to access affordable housing in the area in which they wish to live.

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Metacre Ltd.	De Pol Associates	Not specified	Not specified	No	The first paragraph of Policy H3 should be deleted because there is no basis to suggest that residential conversions and changes of use are only acceptable when they relate to redundant buildings and there is a need for additional housing. The justification text to the policy makes reference to the need to protect employment sites, however, this is already covered by separate employment policies in the Local Plan and does not justify a moratorium on all conversions and change of use scheme other than when they relate to redundant buildings and there is a need for housing.	The first paragraph of policy H3 should be deleted, together with the related text in the justification to the policy.	The Council agrees with these comments: MODIFICATION no MNR028 Modification : delete the first paragraph of policy H3 and the related text in the justification.
Policy H4 Affordable Housing							
Home Builders Federation		Not specified	Not specified	No	Viability – it is imperative that the policy requirement is set at a level which is deliverable in the majority of cases. The HBF has a number of issues with the Viability Appraisal of the Local Plan. Build costs – are not related to BCIS, as Recommended by the 2012 Local Housing Delivery Group report 3, and the PPG. Costs used underestimate costs for small developers. Net Sales Area should be used for the review of new build and re-sales. A figure of between £0 and £7,500 per unit is applied for opening up Green field sites, the upper end of this range is significantly below the £17,000 - £23,000 per dwelling for large sites used in the 2012 Local Housing Delivery Group Report	Policy requirement should be amended – not specified. Assumptions in the Viability Appraisal of the plan are wrong and should be revisited.	The policy requirements of the plan have been viability tested. The plan is viable. The Viability Assessment concludes - the overall scale of obligations, standards and policy burdens contained in the emerging Local Plan are not of such a scale that cumulatively they threaten the ability of sites and scale of development identified in the plan to be developed viably. The Council considers the Viability Appraisal of the Local Plan to be a robust piece of evidence. No change to the Plan.

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					Tenure, the HBF supports the flexibility in the policy, it is imperative that requirements are agreed quickly, our members have experienced delays in Fylde.		
Blackpool Council		Not specified	Not specified	No	At the Revised Preferred Option Stage Blackpool Council requested that a policy be included in the Fylde Local Plan to enable off site payments for affordable housing expenditure in Blackpool. The request was noted but no policy wording has been included by Fylde in the Publication Version of the Plan. The context to this are Blackpool's representations to the Whyndyke Farm planning application, (1,310 homes in Fylde and 90 in Blackpool). Blackpool suggested rather than building affordable housing on site, contributions could be made to deliver high quality affordable housing offsite within inner Blackpool, to assist sustainable housing regeneration in these areas. The request was turned down with legal advice in the committee report concluding there was a lack of policy support within Fylde's planning framework to support Blackpool's proposal. Blackpool Council requests that further consideration is given to this matter. Blackpool has a unique and extreme set of circumstances, the inner areas of Blackpool have an extremely dysfunctional and unbalanced housing supply. The adopted Core Strategy focusses on regeneration and supporting growth, adjoining areas should support these aims. Goal 4 supports growth and enhancement in South Blackpool and links it to resort regeneration through New Homes Bonus	Blackpool Council suggest that the following wording is added to the policy: For residential developments at the Fylde- Blackpool Periphery, cross boundary financial contributions to provide affordable housing provision in Blackpool will be sought where appropriate, to accord with Blackpool's housing strategy and to support inner area regeneration in Blackpool. Also the insertion of an additional paragraph to the justification of Policy H4: The Fylde- Blackpool Periphery Strategic Location is adjacent to the boundary with Blackpool and has greater connections with Blackpool in terms of character and geographical location. As a result of changes in the demand for holiday accommodation in Blackpool, there is a significant oversupply of small, poor quality bedsits and flats or houses in multiple occupation and the building stock is poor quality and need of investment and renewal. The	The Council considers that the policy, as currently worded, contains sufficient flexibility that cross-boundary contributions for affordable housing in Blackpool would not be precluded, but would depend on the individual circumstances of the case and local affordable housing need.

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					and commuted sum payments, whilst providing a complementary housing offer to those homes delivered in the inner areas. This approach was found sound by the Blackpool Local Plan Inspector. Land at the Fylde- Blackpool Periphery has closer connections with Blackpool and is detached from the main settlements of Fylde. With this in mind Blackpool considers it not unreasonable to request an approach to commuted sums which reflects Objectives 18 and 19 of the Blackpool Core Strategy. This approach has been used in Blackpool close to the boundary with Fylde at Moss House Farm and Runnell farm, with both developments required to pay sums of money towards affordable housing in the inner area. Both applications were agreed at appeal and post the NPPF. This request is supported by paragraph 50 of the NPPF which permits off site affordable housing provision or a financial contribution of a broadly equivalent value if it can be robustly justified (for example to improve or make use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Cross boundary commuted sums would also involve linking the payments to making an appropriate level of affordable housing in Blackpool available to Fylde residents. The SHMA indicates that there is a very low affordable housing need in the rural south west of Fylde, however, 30% of Fylde's housing requirement is proposed at the Fylde- Blackpool Periphery. This means affordable housing could be delivered at	Blackpool Core Strategy pursues a dual strategy of regeneration and supporting growth. It is important that planning policies relating to development on the Fylde-Blackpool Periphery support this dual focus and contribute towards achieving the Blackpool Core Strategy goals. Therefore, where appropriate, cross boundary financial contributions to provide affordable housing in Blackpool will be sought.	

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					the Fylde Blackpool Periphery to meet the needs of people from other areas of Fylde, whose needs could equally be met in Blackpool. We acknowledge that in seeking cross boundary affordable housing commuted sums that a balance needs to be struck between on site and off site provision, we are advocating a flexible approach to be decided on a site by site basis. Most of the land at the Fylde – Blackpool Periphery has planning permission however 442 units at Cropper Road West do not, and other sites could come forward, this amendment would future proof the Plan.		
Britmax Developments	Indigo Planning	Yes	Not specified	No	Support for the recognition that it is not always viable for new housing schemes to provide or make a contribution towards affordable housing. The final percentage/contribution should be determined by economic viability and individual site and market condition. Affordable housing policy should allow for the affordable contribution to be provided as an offsite financial contribution towards affordable housing in a more appropriate location within the Borough, as allowed for under paragraph 50 of the NPPF.	Affordable housing policy to be amended to allow for an off-site financial contribution towards affordable housing in a more appropriate location within the borough.	The policy does allow for affordable contributions to be paid towards off site affordable housing. Para 50 of the NPPF makes no reference to more appropriate locations, it does refer to off-site provision or a financial contribution being robustly justified to make better use of existing stock and the agreed approach contributing to creating mixed and balanced communities. No change to the Plan.
Hallam Land Management	Pegasus Group	Not specified	No	Not specified	Support for the flexibility in the policy, by its reference to viability. Base land values and build costs have been underestimated in the Economic Viability Assessment, this undermines site viability in Fylde.	It should be explained that it has been assumed that starter homes would have	The Council considers the Viability Assessment of the plan to be a robust piece of evidence. At present, there is no starter homes requirement. The EVA therefore assesses the impact based on the

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					HLM welcome the reference to starter homes as a proportion of rather than an addition to the 30% affordable requirement, we note that Starter Homes have not been factored into the Viability Assessment, which undermines it and the wider policy further. If it is assumed that this is because they would have less impact on affordability than affordable products, this should be explained, neither does it take account of the negative impact starter homes will have on adjacent market housing with non-first time buyers not willing to pay 20% more for the same product. The flexible case by case approach to tenure is welcomed this must be supported by up to date evidence and regular correspondence between Council Officers and Registered Providers to ensure each scheme properly reflects the local market and requirements of the Registered Providers; and can be agreed in a timely fashion, as the current process has led to delays. This section should include a reference to this.	less impact on affordability than affordable products. There should be a section on the timely agreement of provision as the current process has led to delays.	current position. If the starter homes requirement is invoked, it will be a statutory requirement, but the policy provides that the starter homes requirement would partially replace the requirement for affordable housing. Until the contents of the regulations are known, the impact of starter homes cannot be assessed with certainty. No change to the Plan.
Persimmon Homes		Not specified	Not specified	Not specified	Support the reference to Starter Homes. Given the unknown quantity of the legislation at this time however, to require the whole of the remainder of the affordable requirement to be delivered as rented tenures is unjustified. This removes the delivery of any other forms of intermediate affordable tenure. It is appreciated that the policy goes on to say that that the precise requirements will be negotiated on a case by case basis	None specified	At present, there is no starter homes requirement. The EVA therefore assesses the impact based on the current position. If the starter homes requirement is invoked, it will be a statutory requirement, but the policy provides that the starter homes requirement would partially replace the requirement for affordable housing. Until the contents of the regulations are known, the impact of starter homes cannot be assessed with certainty.

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					It is inappropriate to specify the bedroom number for starter homes provided on site, as this may conflict with national policy. We do not support the requirement to adhere to the National Technical Standard for the affordable products. We have no issue in providing tenure blind houses, sharing house types, materials and specifications with the open market units.		No change to the Plan.
Oyston Estates	Cassidy & Ashton	Yes	Yes	No	Policy H4 is too prescriptive, in particular the 43% equivalent for offsite provision is unlikely to be viable, intermediate and shared ownership should be included, the size and type is too prescriptive. Policy H4 should be revised to delete any specific reference to the specific off site provision and should allow for the provision of intermediate or shared ownership.	Policy H4 should be revised to delete any specific reference to the specific off site provision and should allow for the provision of intermediate or shared ownership.	Paragraph 50 of the NPPF does allow for off-site provision as long as it is robustly justified. If off site provision was deleted the policy would not comply with the NPPF. The policy does allow for the provision of intermediate or shared ownership where it states ……'unless otherwise specified by the Council.' No change to the Plan.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Minority Group - Liz Oades		Not specified	Not specified	Not specified	We propose the wording of the second paragraph should read "the provision of affordable housing will be to meet the need for those settlements ". The existing wording in the Plan effectively means that Kirkham, Wesham, Warton, Freckleton and Lytham St Annes will take all the affordable housing for the borough and , as there is no housing development proposed for Freckleton, it means that Kirkham, Wesham and Warton will tend to get ever increasing numbers of this type of housing. This is poor planning and affects the balance of housing provision in communities. Our proposed change of wording was not accepted. It was defeated, chiefly by a block vote of Fylde's conservative group. We regard this change as being essential for a sound plan.	We propose the wording of the second paragraph should read "the provision of affordable housing will be to meet the need for those settlements ".	Most of the affordable housing will be provided at the strategic locations for development in accordance with the plans development strategy. Affordable housing will be provided to meet the requirements identified for borough wide needs. Figure 9.6 of the SHMA evidences the need for affordable housing at Kirkkam/ Wesham & Freckleton/Warton. No change to the Plan.
Keith Halliwell	JWPC Ltd.	Yes	Not specified	No	The policy is incredibly prescriptive and has the potential with H2 and ENV4 to restrict development from being delivered. This makes the Local Plan ineffective. Only the larger significant or strategic sites should be considered relevant for all of these policies relating to new housing. What assessment has the Council done regarding the amount of land required to deliver, for example, a site of fifteen new dwellings against these policies. Such cumulative restrictions on sites of up to a few hectares would reduce the rate of overall housing delivery by making them unattractive to developers at a time when the Council needs to increase delivery.	The requirements in H4 should only be applied to the larger significant or strategic sites.	The policy requirements of the Plan have been viability tested. The Plan is viable. The Viability Assessment concludes - the overall scale of obligations, standards and policy burdens contained in the emerging Local Plan are not of such a scale that cumulatively they threaten the ability of sites and scale of development identified in the plan to be developed viably. No change to the Plan.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Policy H5 Gypsies, Travellers and Travelling Showpeople's Sites							
Kirk Mullhearn		Not specified	Not specified	Not specified	I wish to lodge an objection to your local plan, as it fails to effectively plan for the accommodation needs of the Showmens/Fairground community in Fylde.	The plan does not effectively plan for the needs of the Showmens/Fairground Community in Fylde.	The Council has updated its GTAA to reflect the new definition of Gypsies, Travellers and Travelling Show People. The updated study continues to show no need to provide plots/yards for Travelling Show People. No change to the Plan.
Russell Holland		Not specified	Not specified	Not specified	I wish to lodge an objection as there are no plans for the accommodation needs of the travelling showman's community in the Fylde, I would like to meet the inspector to voice my concerns as the need for showman's sites has not gone away as your last survey suggested.	The plan does not effectively plan for the needs of the Showmens/Fairground Community in Fylde.	The Council has updated its GTAA to reflect the new definition of Gypsies, Travellers and Travelling Show People. The updated study continues to show no need to provide plots/yards for Travelling Show People. No change to the Plan.
CPRE – Fylde District		Not specified	Not specified	No	CPRE believe that travellers and gypsies have the right to a decent home but undue harm should not be imposed on other people, and the environment and countryside we all share. It is the responsibility of the Local Plan to allocate suitable Gypsy, Travellers and Travelling Showpeople's sites. Such sites should not be allowed as an exception to restrictions for development in the Fylde countryside. There should be no exception to Policy GD4 to allow sites. Site allocations will need to show the 6 pitches allowed on appeal at Angel Lane, Fairfield Road, Hardhorn.	Site allocations will need to show the 6 pitches allowed on appeal at Angel Lane, Fairfield Road, Hardhorn.	The Council is updating its GTAA; when the new evidence is available the requirements for pitches will be amended accordingly.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
H6 Isolated New Homes in the Countryside							
CPRE – Fylde District		Not specified	Not specified	No	There is inconsistency between Policy H6 and Policy H7. As worded Policy H6 could permit a new homes in the countryside on the grounds of '*exceptional quality of design of the building helps to raise standard of design more general in the countryside.* Any new home should follow the same rules and justification of Policy H7 concerning 'large homes'.	H6 should have the same justification as H7.	Policy H6 relates to isolated **new** homes in the countryside, part 2 of the policy is directly taken from the NPPF. Policy H7 relates to replacements and extensions of **existing** homes in the countryside and is aiming to achieve sustainable development when the principal of residential development is already established. The Plan must be read as a whole and Policy GD7 Achieving Good Design in Development would also be relevant.
PWA Planning		Not specified	Not specified	No	H6 does not reflect the guidance in NPPF Para 55 because there is very limited reference to the re-use of redundant or disused buildings, where this would lead to an enhancements of their immediate setting. An additional criteria should be included which refers explicitly to the reuse of redundant buildings. The supporting text should also reflect this exception and should ideally repeat NPPF Para 55 verbatim.	A separate additional criteria should be used for the reference to the re use of redundant or disused buildings.	**MODIFICATION no MNR029** Agreed. Additional criterion 4 to be added in line with para.55 of the Framework.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Support for the acknowledgement that replacement and extension of existing homes, with an allowance for an increase by a maximum of 33%, is acceptable in the open countryside. It should be made explicit in the policy that this also applies to existing homes in the greenbelt, which is allowed for under paragraph 89 of the NPPF. This is required to ensure the policy is consistent with national policy.	Policy H7 should make it explicit that this policy also applies to homes in the Green Belt.	In Fylde all of the Green Belt is countryside, with countryside washing over the greenbelt, therefore this policy does apply to existing homes in the Green Belt. No change to the Plan.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 11: Health and Wellbeing							
Policy HW1: Health and Wellbeing							
Oyston Estates	Cassidy & Ashton Group Ltd.	Yes	Yes	Yes	Paragraph 11.9 should be revised to emphasise that it is the developer who will lead the development with support from key community and local government organisations.	The para. should be re-worded to say: *The initiatives designed to make Whyndyke Garden Village a healthy community will be driven by the developer with support from key community, health and local government organisations, as appropriate and subject to viability. It is intended that the built environment, social integration, community development and transport will be designed to provide the opportunity for everyone to easily choose a healthy diet, lifestyle, attitude and activity.*	The paragraph as currently worded is considered appropriate – no change.
Policy HW2: Community Facilities							
-	-	-	-	-	-	-	-
Policy HW3: Protection and Provision of Indoor and Outdoor Sports Facilities							
-	-	-	-	-	-	-	-

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 12: Infrastructure, Service Provision and Transport							
Policy INF1: Service Accessibility and Infrastructure							
Persimmon Homes Lancashire		Not specified	Not specified	No	The policy states that development should "mitigate any negative impacts on the quality of the existing Infrastructure as a result of new development." The wording is not compliant with the Framework as it is not positively prepared. That is to say not all negative impacts can be fully mitigated for, but this is not on its own, a sufficient reason for refusal.	The impact of viability on delivery of development should be considered. If an LPA are unable to show a 5 year housing land supply, national policy guides us to "grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." and in the case of impacts on the Local highway Network: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments. Criterion b states '…Minimise any negative impacts...' This wording is therefore considered to be compliant with the Framework.
United Utilities		Not specified	Not specified	Not specified	Welcome the inclusion of criterion 'e' in Policy INF 1.	None specified	Support welcomed
Policy INF2: Developer Contributions							
United Utilities		Not specified	Not specified	Not specified	Support the inclusion of criterion 'c' in Policy INF 1.	None specified	Support welcomed
Warton East Developments	Satnam Group	Not specified	Not specified	No	Policy is too prescriptive to meet government policy on contributions and benefits sought from developments. The policy should be amended to make clear that the types of obligations set out are suggestions only and each site must be assessed on its own merits. The policy as drafted in not compliant with national policy and CIL.	The policy should be redrafted.	The policy as currently worded is considered appropriate – no change. Paragraph 204 of the Framework states that planning obligations should only be sought where they meet all of the following tests: necessary to make the development acceptable in planning terms;

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
							directly related to the development; and fairly and reasonably related in scale and kind to the development. The list in Policy INF2 is not exhaustive and could apply if appropriate. The list is not prescriptive.
Britmax Developments	Indigo Planning	Yes	Not specified	No	Need to ensure that any planning obligations required as part of new developments are CIL compliant and meet the tests set out at paragraph 204 of the NPPF. It is also important that viability of schemes is taken into account when determining the level of contributions to be required as part of new schemes. Paragraph 205 of the NPPF re-iterates that sufficient flexibility should be provided to ensure that developments are not stalled due to onerous obligations impacting upon the deliverability of the site.	For this policy to be sound, it needs to be consistent with national policy and should, therefore, be sufficiently flexible to take viability matters into account.	The policy as currently worded is considered appropriate – no change. Paragraph 204 of the Framework states that planning obligations should only be sought where they meet all of the following tests: necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The Plan should be read as a whole. Potential viability issues are referred to in the last paragraph of Policy INF2.
Hallam Land	Pegasus Group	Not specified	Not specified	Not specified	Welcome the use of the words *'subject to viability'* and *'normally'* in this policy requesting planning obligations as this builds in flexibility which should help marginal sites to come forward which may otherwise have been rendered unviable by the combined requirements of the listed obligations.	None specified	Support noted.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Hallam Land	Pegasus Group	Not specified	Not specified	Not specified	Welcome the reference in paragraph 12.19 to the CIL regulations on pooled contributions (Regulation 123) which came into force in April 2015.	The main policy wording should include reference to pooled contributions, by clearly stating that obligations will be sought for specific projects, as this will also ensure that the Regulation 122 tests are met in terms of the obligation being necessary, directly related, and fairly and reasonably related in scale and kind to the development.	The policy and relating justification as currently worded is considered appropriate – no change. The Council does not agree with the consultee's comments, instead it is considered appropriate to refer to this within the justification text only.
Policy T1: Strategic Highway Improvements							
Highways England		Not specified	Not specified	Not specified	'…Fylde Council must demonstrate that the traffic impacts of the Fylde Local Plan sites, in isolation, can be accommodated by Junction 3. We have therefore recommended to the Council that they build upon the previous work methodology undertaken by Highways England (referred to above) to assess the traffic impacts at the Junction. To this end, it is understood that Fylde Council intends to commission this work to be done for Highways England to then review. Highways England is working to assist Fylde Council to procure this work directly through our spatial planning consultants with a view to the evidence being available for consideration by Fylde Council and ourselves during autumn 2016.' 'We recognise that improvements to M55 Junction 3 will be required in the future in order to be able to support levels of growth contained within the Plan. Highways England is currently pursuing	None specified	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. The appropriate evidence base will continue to be progressed in respect of the M55 Junction 3 in line with Highways England's requirements.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					opportunities to progress improvements to the junction through its own road improvement funding mechanisms. 'However, at the present time, it should be recognised that there is no certainty as to whether further improvements of the junction (likely to include full signalisation) will be funded. In view of the fact that the majority of Plan development within the vicinity is already committed (and so offers more limited scope for a developer-funded scheme), should Highways England not be able to fund improvements in the medium term, we will continue to monitor the situation at the junction. It may be that other opportunities may have to be explored to fund improvements through other funding sources and developer contributions (should mitigation be necessary as part of any future applications).'		
Historic England		Not specified	Not specified	Not specified	Paragraph 12.37 – there should be a commitment to heritage protection as well as nature conservation accompanying this policy.	Change para. 12.37 to include a commitment to heritage protection as well as nature conservation.	Comments noted. **MODIFICATION no MNR 031** Amend the end of the 1st sentience of paragraph 12.37 to include "…., *policy **ENV2** on Biodiversity and policy **ENV5** on Historic Environment*."
Blackpool Council		Not specified	Not specified	Not specified	Paragraph 12.35: We are not aware that the North Fylde Connectivity Study has been progressed.	None specified	Comment noted. The North Fylde Connectivity Study is still to be carried out by LCC. The Fylde Coast Highways and Transport Masterplan states a Study completion date of 2016/17. Wording will be amended to reflect this. **MODIFICATION no MNR030** Delete the following wording from the 1st sentence of paragraph 12.35

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
							"…..~~and the North Fylde Connectivity Study~~……."
Royal Mail Group Ltd.	Cushman & Wakefield	Not specified	Not specified	Not specified	Recognise the importance of delivering infrastructure investment across the Borough, such transport proposals could have an impact on Royal Mail's operation, particularly in meeting its statutory obligations to deliver a 'Universal Service' across the Borough and nationally. The transport proposals, either during the construction period, or once operational, may have an impact on the ability for Royal Mail to meet its requisite postal delivery times. The construction phase of such infrastructure works could have implications for Royal Mail in terms of road closures, access restrictions or Traffic Regulation Orders.	Request that the Council continues to liaise with Royal Mail, and its planning advisor, to ensure that the Royal Mail has an opportunity to review and respond to the infrastructure work proposals once they reach planning application stage, and when Traffic Regulation Orders are submitted for highway works to allow Royal Mail to plan ahead and adapt and respond to any changes on the highway network to avoid disruption.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. Royal Mail will be consulted.
Carrington Group	Johnson Mowat	Not specified	Not specified	No	Comments relate to a specific site, the north eastern extent of which is subject to the preferred line of the 'Blue Route' or M55 to Fleetwood Corridor improvements. Their proposed development would fully comply with Policy T1 and would in no way prejudice the delivery of either the 'Blue Route' or Option 1 of the Highways England 'Windy Harbour – Skippool Major Scheme' proposal. Consider the plan to be unsound and contrary to the provisions of the Framework as a proportionate evidence base has not been utilised to inform the safeguarding of the blue route.	Include the findings of the M55 Fleetwood Corridor Study remove the safeguarding of the Blue Route	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. LCC, as the Highways Authority, has been protecting the route of the Blue Route since 9th March 2009. Fylde Council is legally obliged to identify the safeguarded route, until such time as they are formally advised not to do so by LCC.
Policy T2: Warton Aerodrome							
BAE Systems	Cass Associates LLP	Yes	Yes	Yes	BAE Systems support this policy which seeks to safeguard land to the north of Warton Aerodrome runway from	None specified	Support noted.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					development proposals (except limited extensions to existing properties).		
Policy T3: Blackpool Airport							
Balfour Beatty	Nathaniel Lichfield & Partners	Not specified	Not specified	No	Concerned that their previous comments could render the Plan unsound if not properly dealt with. For a range of reasons including: It limits development of airport-related buildings and facilities within the Green Belt and, negates the permitted development rights afforded to an airport operator as set down at Part 8, Class F of the Town and Country Planning (General Permitted Development) (England) Order 2015. The revised Policy T3 twice includes the same double negative regarding '*overriding operational requirements that constitute very special circumstances'* as set out for Policy EC4, this wording should be removed in order to ensure that the policy is not ambiguous. Our proposed wording makes it clear that the Green Belt will be safeguarded from non-airport related development and Policy T3 would operate alongside the Framework (para 88 and 89) The revised paragraph 12.41 of the reasoned justification is also misleading in implying that land has been omitted from the Green Belt to facilitate further airport operational development, when no Green Belt review has been undertaken. It states that *"sufficient land within the airport complex has been omitted from the Green Belt to facilitate further airport operational development*". This statement implies that there will be resistance to aviation–related	Policy T3 should be amended as follows: *…….. lands of the airport, ~~which will be~~ identified on the Policies Map will be safeguarded from non-airport related development and the continuing operation and viability of the airport as a sub-regional facility will be supported.* *Further development required in relation to the operation of Blackpool Airport including Centrica's heliport, or development of ancillary leisure uses, will be located in accordance with the masterplan prepared to guide development that delivers the objectives of the Blackpool Airport Corridor Enterprise Zone. ~~the areas outside the Green Belt, which will be identified on the Policies Map, unless there are overriding operational requirements that constitute very special circumstances and which justify development in the Green Belt.~~* *The Council will support improvements to surface access (public transport) to Blackpool Airport from*	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. See also Council's response on comments received under Policy EC4.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					buildings / facilities being located in the Green Belt. Such intentions would be inconsistent with Policy EC4, which now offers support for the relocation of buildings closer to the runway (and, therefore, likely to be in Green Belt land) and also the Enterprise Zone objectives of re-siting aviation functions / buildings onto Green Belt land adjacent to the main runway.	*surrounding areas and other transport nodes.* *Blackpool Airport, including Centrica's heliport will be consulted on all developments within the Airport Safeguarding Zone which will be shown on the Policies Map.* Amend justification paragraphs: 12.39 – Delete the following, ….~~*which do not constitute permitted development However, there is sufficient land within the airport complex outside the Green Belt to facilitate further airport operational development."*~~ Para 12.41 – delete last sentence	
Glasdon Group	Cassidy & Ashton	Yes	Yes	No	The Policy needs to be flexible to cater for changing requirements at the Airport Enterprise Zone, including non-airport uses. The policy currently worded is too prescriptive and prevents the creation of much needed employment-led development in the area.	The Policy should be modified to allow non-airport development in appropriate circumstances, in accordance with the requirements of the Enterprise Zone.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. See also Council's response on comments received under Policy EC4.
Policy T4: Enhancing Sustainable Transport Choice							
Blackpool Council		Not specified	Not specified	Not specified	Paragraph 12.54: The Fylde Coast Highways and Transport Masterplan doesn't actually refer to a North Fylde Line Stations Viability Study.	Amend para. 12.54 to remove reference to North Fylde Line Stations Viability Study	**MODIFICATION no MNR032** Minor amendment to para. 12.54 remove '…North Fylde Line Stations Viability Study…' and replace with

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
							'…North Fylde Coast Connectivity Study…'
The Trams to Lytham Team		Not specified	Not specified	Not specified	The Blackpool Tramway must have a greater role in the overall transport plan for the Fylde Coast, delivering the network the region deserves and needs to become an integral part of the 'Northern Powerhouse'. Linking Blackpool's ever popular tramway to the South Fylde Line will solve many of the issues facing the whole of the Fylde Coast. Better transport links are also needed to provide more job opportunities to the area, with cheap, quick connections to future economic centres like the Blackpool Airport Enterprise Zone and the Talbot Gateway development possible through LRT. Serious consideration should be given to create a tram/train/bus interchange at St Annes or Lytham stations.	None specified	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. Delivery of any route options for the South Fylde Line will be delivered via LCC. The Fylde Coast Highways and Transport Masterplan includes reference to the fact that a South Fylde Line Study: SINTROPHER Project will be carried out.
LSA Cycle Group		No	Not specified	No	This policy seeks to achieve a modal shift away from car use to alternative forms of transport. However, the Plan is dominated by major road infrastructure projects each of which is likely to encourage car use and long distance community. The Plan does not indicate whether an increased frequency of service is supported by the planning authority. The Plan should incorporate a clear policy statement that the planning authority will seek an increased frequency of service on the South Fylde line independent of any	The Plan should make it clear that the proposed road infrastructure projects may well increase car use and long distance community contrary to its policy statement. The Plan should incorporate a clear policy statement that the planning authority will seek an increased frequency of service on the South Fylde line independent of any proposals to link this line with the Blackpool tramway.	All comments noted. The policy and relating justification as currently worded is considered appropriate – no change. This is the intention of part l. of Policy T4, but additional wording added to for clarification **MODIFICATION no MNR 033**

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					proposals to link this line with the Blackpool tramway.		
Policy T5: Parking Standards							
No representations received.							

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 13: Water Management, Flood Risk and Climate Change							
NFU		Not specified	Not specified	Not specified	Welcomes the Council's intention to protect the BMV land, and both the recognition of and policies that facilitate rural development and diversification.	The LP could do more to reinforce the link between emissions and the effects of climate change.	The policies and justification in this chapter are considered to be worded appropriately – no change.
Historic England		Not specified	Not specified	Not specified	It is generally recognised that many aspects of the historic environment could be affected by climate change.	Acknowledgement of the historic environment in paragraph 13.3 would be helpful.	The policies and justification in this chapter do not preclude the historic environment – no change.
Policy CL1: Flood Alleviation, Water Quality and Water Efficiency							
United Utilities		Not specified	Not specified	Not specified	Supports the inclusion of their previous comments at RPO stage within the policy and justification.	None specified	Support welcomed
Story Homes Ltd.	Barton Willmore	No	No	No	Generally support the need for sustainable drainage techniques in reducing the risk of flooding and harm to the environment. However, concerned that the Local Plan should not be seeking to a) unnecessarily replicate the role of the Environment Agency b) require developers to incorporate unnecessarily onerous drainage measures that go above and beyond what is necessary for each site on its own merits. The burden of combined policy requirements can impact on the viability of developments.	None specified	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Policy CL2: Surface Water Run-Off and Sustainable Drainage							
United Utilities		Not specified	Not specified	Not specified	Supports the inclusion of their previous comments at RPO stage within the policy.	None specified	Support welcomed.
Persimmon Homes		Not Specified	Not Specified	Not Specified	It is unfeasible to require to have always have agreed discharge rates pre-application.	None specified	The policy as currently worded is considered appropriate – no change.
Story Homes Ltd.	Barton Willmore	No	No	No	Generally support the need for sustainable drainage techniques in reducing the risk of flooding and harm to the environment. However, concerned that the Local Plan should not be seeking to a) unnecessarily replicate the role of the Environment Agency b) require developers to incorporate unnecessarily onerous drainage measures that go above and beyond what is necessary for each site on its own merits. The burden of combined policy requirements can impact on the viability of developments.	None specified	The policy as currently worded is considered appropriate – no change.
Policy CL3: Renewable and Low Carbon Energy Generation – excluding onshore wind turbines							
Historic England		Not specified	Not specified	No	Criterion (f) is welcomed in its intent, but does not satisfy the Framework. The requirement should be for renewable and low carbon energy schemes to demonstrate that the public benefits they would achieve outweigh the harm to any heritage assets affected and that those benefits cannot be achieved in any other way.	None specified	The policy as currently worded is considered appropriate – no change
Friends of the Earth		Not specified	Not specified	Not specified	There is insufficient regard to the requirement to ensure that policies in the plan "*as a whole contribute to the mitigation and adaptation of climate change*". We do not think the justification at paragraph 13.48 can be used to exclude	Amend wording to include the following: *Particular support will be given to renewable and low carbon energy generation developments that:*	The policy as currently worded is considered appropriate – no change. The Council disagrees and considers that due to the number of constraints within Fylde it is acceptable to omit

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					wind entirely – instead a proper map setting out the proven constraint areas, should be used to show where development can come forward.	*a) Are led by, or meet the needs of local communities; and* *b) Create opportunities for co-location of energy producers with energy users, in particular heat, and facilitate renewable and low carbon energy innovation. When considering such proposals, regard will be given to the wider benefits of providing energy from renewable sources, including wind energy, as well as the potential effects on the local environment; including any cumulative impact of these proposals.*	wind energy development from the Plan.
BAE Systems	Cass Associates	Yes	Yes	Yes	BAE Systems support this policy and in particular the criteria that states proposals for renewable and low carbon energy generation must avoid impacts on aviation and defence navigation systems and communications should be given significant weight in decision making.	None specified	Support noted.
Story Homes Ltd.	Barton Willmore	No	No	No	Overall, we maintain support for the need to improve the carbon foot print of new development; however, the Council needs to ensure that the requirements of this policy do not hinder the viability of development. The burden of combined policy requirements can impact on the viability of development to the extent where the delivery of market and affordable housing is compromised.	None specified	The policy as currently worded is considered appropriate – no change.
Policy CL4: Decentralised Energy Networks and District Heating Systems							
No representations received on this policy							

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Chapter 14: Preserving and Enhancing the Natural, Historic and Built Environment							
Policy ENV1: Landscape							
Hallam Land Management Ltd.	Pegasus Group	Not Specified	Not Specified	No	Parts A and B are somewhat contradictory with one another.	The Policy should be revised to be consistent. Part A should be revised to include the phrase: "…or mitigation can avoid affecting site integrity."	The policy as currently worded is considered appropriate – no change.
Policy ENV2: Biodiversity							
Natural England		Not specified	Not specified	Not specified	The HRA places heavy reliance on this Policy and it appears contradictory to Natural England to identify impacts on the designated sites from one aspect of the plan and resolve this through reliance on another part of the plan. If the Council believes that Policy ENV2 is able to negate LSE in the HRA then this should be explained more clearly. Policy states that a SPD will be available later in 2016, however it is unclear how this is currently progressing.	The SPD needs to be in place alongside the Local Plan, if reliance is to be placed on the SPD it is critical it is progressed as soon as possible.	The policy as currently worded is considered appropriate – no change. The Council have consulted with key stakeholders on the scope and level of detail that should be included within the SPD, however the intended timetable has slipped slightly due to various issues including staff shortages and the prioritising of the Local Plan to EiP stage. The Council will continue to progress the SPD following the EiP, in early 2017.
The Woodlands Trust		Not specified	Not specified	Not specified	Would like to see this Policy give specific protection to ancient woodland and ancient or veteran trees. It is essential that no more of this finite resource is lost.	We would like to see wording to the effect that damage to or loss of ancient woodland or ancient and veteran trees should only be allowed in the most wholly exceptional circumstances.	**MODIFICATION no MNR035** Amend the 3rd paragraph to include "…..affect any sites of local importance <u>including ancient woodland or ancient and veteran trees</u> will be….."
Oyston Estates	Cassidy & Ashton Group Ltd.	Yes	Yes	No	Parts A and B of Policy ENV2 are somewhat contradictory with one another.	Part A should be revised to include the phrase: "… or mitigation can avoid affecting site integrity."	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
Ideal Corporate Solutions Ltd.	Emery Planning Partnership	No	Yes	No	Policy does not follow paragraph 113 of the Framework, which requires criteria based policies, distinguishing between the hierarchy of designations. As currently drafted the policy would appear to apply to all designated sites irrespective of their status; and indeed non-designated sites according to the subsequent list of sites to which the policy would apply. It would also restrict development on local designations and non-protected species in a manner identical to that applied to protected species. Valentines Kennels is identified on the proposals map as part of a Biological Heritage site, despite the reasons for the designation no longer applying to the site, and there being no statutory objections on ecology grounds for refusing the recent planning application. There is clearly potential for development to come forward within the designations covered by Policy ENV2.	We therefore recommend that the policy is amended as follows: *"Designated sites of biological and geological conservation importance will be protected from any significant adverse impacts of development, having regard to an up-to-date assessment of the site and the potential for appropriate mitigation (where necessary). The level of protection should be proportionate to the status of the designation, and give appropriate weight to their importance and the contribution that they make to wider ecological networks. Any adverse impacts will be weighed against the benefits of the proposed development."*	The policy as currently worded is considered appropriate – no change.
Historic England		Not specified	Not specified	Not specified	Paragraph 14.18 - many hedgerows are of heritage importance, and may often be found in association with mature/ancient trees and historic rights of way.	None specified	**MODIFICATION no MNR034** Paragraph 14.18 will be amended to read "*The Fylde landscape contains features of local and <u>heritage</u> importance, for ....."*
Policy ENV3: Protecting Existing Open Space (the Green Infrastructure Network)							
Treales, Roseacre & Wharles Parish Council		Not specified	Not specified	No	Whilst Policy ENV3 has a number of paragraphs seeking to protect the character of public open space in the settlement hierarchy, there is no protection for open space which is considered essential to the setting,	add a paragraph as follows :- h. *Development will not be permitted on existing open space (the Green Infrastructure network),*	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					character, or visual amenities of communities in the countryside.	*defined on the Proposals Map, which is considered essential to the setting, character, or visual amenities of communities in the countryside*	
The Minority Group – Liz Oades		Not specified	Not specified	Not specified	The recent Open Space Study Update and Playing Field Strategy are poor documents much of the information within them is inaccurate, they are lazy studies and should be redone ensuring that the information is fully accurate. At the Planning Policy meeting held in June there was a discrepancy noted in relation to the population figures within the documents, this should perhaps be looked at again?	None specified	The policy as currently worded is considered appropriate – no change. The studies are currently being checked for factual and textural inaccuracies.
Historic England		Not specified	Not specified	Not specified	**Paragraph 14.35** – the description of Green Infrastructure in this paragraph could usefully recognise that a substantial amount of it is of heritage value – for example, Historic Parks & Gardens; cemeteries and burial grounds; open spaces within (for example) conservation areas.	None specified	**MODIFICATION no MNR036** Comments noted and the first bullet point will be amended to include reference to Historic Parks & Gardens; cemeteries and burial grounds and open spaces within conservation areas
Policy ENV4: Provision of New Open Space (the Green Infrastructure Network)							
Gladman Developments		Not specified	Not specified	Not specified	The importance of this policy to secure the provision of new open space is recognised, but consultee questions why housing developments of 100 dwellings or more will be required to provide double the above standards. This casts doubt over whether development could be delivered viably.	None specified	The policy as currently worded is considered appropriate – no change.
Story Homes	Barton Willmore	No	No	No	Maintain that in accordance with paragraph 73 of the NPPF the Council	None specified	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					needs to undertake a robust and up-to-date assessment of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessment should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Therefore we object to this policy as drafted as it is not justified by up -to-date evidence.		The Council commissioned KKP consultants who prepared a Playing Pitch Strategy and updated of the Open Space, Sport and Recreation Study, both documents were published evidence based documents alongside the Publication version of the Local Plan.
Policy ENV5: Historic Environment							
Historic England		Not specified	Not specified	Not specified	This Policy has been substantially redrafted following our advice and would, subject to some further modification and adjustment be acceptable. As a whole it is regarded as a positive strategy for the conservation, enhancement and enjoyment of the historic environment consistent with the NPPF (paragraph 126). As stated in para 14.77, there is a need and desirability to work in with other bodies and organisations to achieve common goals. Reference in this policy should draw upon these partnerships and commit others to a broad range of actions. Welcome the identification of locally important heritage assets for inclusion on a Local List, a significant improvement to the list of actions would be the creation of a grade II listed buildings at risk register. Not all local assets are necessarily 'buildings' and it may not always be desirable to replace a particular asset with something else.	<u>Conservation Areas</u> The sentence beginning 'Demolition' does not read grammatically. Suggest amending: 'Demolition, ***or*** other substantial loss or harm to the significance of a building or feature, including trees, landscapes, spaces (.....) and artefacts ***(omit comma)*** that make a positive contribution to the Conservation Area***, (comma)*** will only be permitted where this harm is outweighed by the public benefits of the proposal. Similarly: 'Proposals should: (b) Preserve or enhance features ***(omit comma)*** making a positive contribution***. (full stop)*** In ~~in~~ particular design, massing, and height of any building ***(omit comma)*** should closely relate.....'	The Council agree with various textual changes, where appropriate: **MODIFICATION no MNR038** *"Demolition, or other substantial loss or harm to the significance of a building or feature, including trees, landscapes, spaces (public or private open space) and artefacts that make a positive contribution to the Conservation Area**, will only be permitted where this harm is outweighed by the public benefits of the proposal."* **MODIFICATION no MNR037** *"(b) Preserve or enhance features making a positive contribution**. In particular design, massing, and height of any building should closely relate....."* **MODIFICATION no MNR039** The heading **Registered Historic Parks and Gardens** will be dropped down as a proper heading.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					Where developers are required to excavate and record any archaeology on the site it should be an additional requirement that they publish their findings within an agreed timetable. **Paragraph 14.62** informs us of the status locally listed buildings within the planning process. The glossary contained in the Framework states that the definition of a heritage asset *includes* designated heritage assets which, as it stands, *allows for* rather than precludes other buildings and structures etc. (not on the list) also being adjudged heritage assets.	The heading 'Registered Historic Parks & Gardens' should begin a new paragraph. The last sentence of this section should omit the word 'significant', and the words 'where appropriate'. Even less than substantial harm would/should be unacceptable if it is not outweighed by public benefits. Locally important heritage assets, in the first paragraph, the word 'retention' should be replaced with 'conservation'. Scheduled Monuments should be amended: 'Development which would result in harm to the significance of a Scheduled Monument ~~and~~ ***or other*** nationally important archaeological ~~site~~ ***sites*** will not be permitted unless it can be demonstrated that the public benefits ***which cannot be met in any other way*** would clearly outweigh the harm.' 'Where there is ***known or*** ~~the~~ potential ~~for~~ non-designated archaeology, developers will be expected to investigate the significance of ~~the~~ ***any*** archaeology prior to the	**MODIFICATION no MNR040** Last paragraph under **Registered Historic Parks and Gardens** shall read: *"Should ensure that development does not cause harm to the enjoyment, layout, design, quality, character, appearance or setting of that landscape, cause harm to key views from or towards these landscapes or, prejudice their future restoration."* **MODIFICATION no MNR041** In the first paragraph under **Locally Important Heritage Assets** the word retention will be replaced by the word conservation. **MODIFICATION no MNR042** The first paragraph under Scheduled Monuments will be amended to read: *"Development which would result in harm to the significance of a Scheduled Monument or other nationally important archaeological sites will not be permitted unless it can be demonstrated that the public benefits which cannot be met in any other way would clearly outweigh the harm."* **MODIFICATION no MNR043** The second paragraph under Scheduled Monuments will be amended to read: "*Where there is known or potential non-designated archaeology, developers will be expected to*

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
						determination of an application for the site.' 'Developers need to undertake research at an appropriate early stage to ~~find out where archaeological remains are~~ **establish whether or not archaeology exists or whether there is the potential for it to exist in order to inform decisions in respect of the site**.'	*investigate the significance of any archaeology …… for the site."* **MODIFICATION no MNR044** The fourth paragraph under Scheduled Monuments will be amended to read: *"Developers need to undertake research at an appropriate early stage to establish whether or not archaeology exists or whether there is the potential for it to exist in order to inform decisions in respect of the site."* In regards to **Paragraph 14.62 –** comments noted but no-change to the text.
St. Annes Town Council		Not specified	Not specified	Not specified	Request that the Council consider providing an 'Article 4 Direction' on specific public house buildings within the Fylde, such as the Victoria Hotel, Church Road. If the Article 4 Direction is not considered to be suitable for inclusion within the Local Plan, this request be sought through other means such as a Supplementary Planning Guidance. The Town Council requests that Public Houses of both heritage and community importance be protected against change of use as a Public House.	None specified	The policy as currently worded is considered appropriate – no change. The Council consider that this is an issue that can be dealt with outside the remit of the Local Plan and as such will be looked into as a separate matter.
Persimmon Homes		Not specified	Not specified	Not specified	In principle no issue with this policy, but feel that the level of provision particularly for development of larger 100plus unit schemes is excessive. This should be carefully considered against the viability of development as such requirements could significantly impact the capacity of development sites by reducing the net developable areas.	None specified	The policy as currently worded is considered appropriate – no change.
Fred Moor		Not specified	Not specified	Not specified	There is a small wording conflict in the Historic Parks and Gardens section which	None specified	The policy as currently worded is considered appropriate – no change.

Consultee	Agent	Legal compliance?	Compliance with DtC?	Sound?	Comments	Changes sought	Council response
					need changing. The lead-in says "Proposals that result in harm to the significance of a Registered Historic Park and Garden or its setting will not be permitted" whilst the later text says "Proposals…. should ensure that development does not cause significant harm" Harming the significance sounds like, but is not the same as, causing significant harm. Anomaly with the Ashton Gardens designation and the Conservation Area boundary.		The suggested anomaly on the Policies Map in regards to the Ashton Gardens designation and the St Annes Conservation Area boundary is not a mistake.

Glossary and Appendices							
Glossary							
Historic England		Not specified	Not specified	Not specified	Some of the definitions are in the wrong alphabetical order.	None specified	**MODIFICATION no MNR045** Comment noted. Following the printing of the document some text does appear to have fallen out of sync.
Appendix 8: Performance Monitoring Framework							
Historic England		Not specified	Not specified	Not specified	The policy indicators for Policy ENV5 are not as SMART as they could be. Indicator 19a is ambitious, and has no intermediate targets before 2032. Indicator 19b is unable to measure the significance outright 'loss'. Indicator 19c is helpful, but does prevent harm to those assets. Indicator 19d has no timeframe and does not measure the extent to which any of those assets are lost or otherwise suffer harm to their significance.	None specified	Comments noted. The Council are liaising with Historic England in regards to amending these Indicators to ensure they are SMART and more acceptable.

Hallam Land Management Ltd	Pegasus Group	Not specified	Not specified	Not specified	Agree that Annual Monitoring Reports are a key component for monitoring the Local Plans. Fylde did produce AMRs in 2015 and 2014, however there was a gap of two years before that where they didn't, and whilst we acknowledge that this was likely due to resourcing issues or duplication in other documents (such as the Housing Land Availability Schedule), we think there should be a specific policy requiring this for all indicators, and not just for housing delivery (as set out in Policy H1).	None specified	The Council does not consider that a specific policy is required to carry this function out. All Performance Monitoring Indicators are measured and evaluated within the annual Authority Monitoring Reports, to ensure that the applicable policy is achieving what is was designed to do. This will continue to be the priority of the AMR.

Infrastructure Delivery Plan (IDP)							
Infrastructure Delivery Plan (IDP)							
Minority Group – Liz Oades		Not specified	Not specified	Not specified	The education figures seem to be inaccurate and I believe that this needs to be revisited.	None specified	The education figures have been set out in agreement with LCC's department for School Planning. Some anomalies have been amended and LCC have provided the Council with more up to date figures.
Highways England		Not specified	Not specified	Not specified	Essentially, the only item outstanding is the highways evidence for the M55 Junction 3 to be carried out on your behalf by CH2M. It is important that this evidence is available before the Plan is finalised, however, I am confident that the evidence will not throw up any major issues that would require a major rethink of the strategy that ourselves and LCC are currently taking in pursuit of improving Junction 3 our concern is whether the SRN can sustainably accommodate Local Plan development and also what highway infrastructure improvements will be required. Therefore, we need this evidence to be able to offer a final response to the Local Plan. Until this work has been completed, our position in relation to the Local Plan at	None specified	The IDP as currently worded is considered appropriate – no change. The appropriate evidence base will continue to be progressed in respect of the M55 Junction 3.

					each of these sections of route can be summarised as follows: **A585(T) North of M55 Junction 3** Continue working with LCC, taking forward work in relation to options for the future improvement of the route between M55 Junction 3 and the Windy Harbour junction. The preferred route is likely to influence traffic patterns and usage of the Thistleton junction. The form of any proposed solution taken forward will be influenced by the major scheme, and as such it is premature to take forward a solution in advance of the major scheme being finalised. The critical factor behind how this section will perform in the future is development within the Wyre district, as this area contains the existing key settlements and sites where further development could take place in the future. **M55 Junction 3** This junction forms part of the SRN and is of key interest to Highways England in relation to the Plan. To assist Wyre Council in the development of their emerging Local Plan, Highways England has undertaken work to assess what the impact of their emerging Local Plan, would be at Junction 3 during AM and PM peak hour periods etc. The results indicated that without mitigation, the impact of Wyre and Fylde Plan trips would result in an unacceptable level of congestion, particularly on the A585(T) North and A585 South arms. The highways evidence suggests that even with achievable suggested mitigation schemes in place across the A585(T) as a		

					whole, the level of growth that can be sustainably achieved within Wyre is likely to be less than the maximum 67% of proposed Local Plan build-out that the route could accommodate. Wyre Council will need to take into account the emerging Fylde Local Plan when formulating its Local Plan in respect of M55 Junction 3. The emerging Fylde Local Plan is at a more advanced stage of development and so reduces available capacity at M55 Junction 3 that Wyre Council may rely upon to support growth within its area. Therefore, we understand that the Fylde Local Plan is likely to have the first call upon the available capacity on the SRN by virtue of being more advanced. Fylde Council must therefore demonstrate that the traffic impacts of the Local Plan sites, in isolation, can be accommodated by Junction 3. **M55 Junction 4** The M55 Junction 4 (Marton Circle) roundabout junction does not form part of the SRN and is operated by LCC in collaboration with Blackpool Council. Highways England's concern however in considering the traffic impact of the Plan is to ensure that growth does not result in traffic seeking to exit the M55 queuing back along the slip road and onto the motorway mainline carriageway. Highways England takes the view that Fylde Council and LCC need to develop a strategy that outlines how these further improvements are to be developed, funded, and then delivered at the appropriate time. M55 to Heyhouses Link Road scheme - Highways England has secured a contribution to this project of £4million to		

					the scheme through the Government's Housing and Growth Fund initiative.		
Peter Whitehead (Windmill Group of Companies)		Not specified	Not specified	Not specified	Shouldn't the new secondary school not be identified where the location will be? LCC's core strategy seeks the provision of a sixty beds' extra care facility in Lytham St Annes – again, would it be appropriate to identify where this might be located. One of our sites (Council reference: 1A842) on the outstanding permissions list is showing as 9 dwellings, this has since increased to 12.	None specified	The Council are in talks with LCC in regards to the secondary education provision, which has yet to be decided. The Council are not aware of this provision and as such do not consider it appropriate to allocate in the Plan. The site is within the Local Plan Trajectory is correct and states 12.
Blackpool Council		Not specified	Not specified	Not specified	Paragraph 2.4: This suggests that the M55 to Heyhouses Link Road will be funded [solely] through Highways England's Growth and Housing Fund. However, Appendix 2 lists a number of funding sources, which we consider is more realistic. Paragraph 2.19: This does not reflect the latest position regarding LCC's subsidised bus network.	None specified	**MODIFICATION no MNR048** Amend **Paragraph 2.4** to reiterate the wording in Appendix 2 in regards to Anticipated Funding Source. The Council have received no information to the contrary and can find no further information other than what is suggested in **Paragraph 2.19.**
Environment Agency		Not specified	Not specified	Not specified	There is an error in the numbering of the sections on page 29 and 30 of the IDP (August 2016): section 3.52 is stated twice which results in the subsequent sections being out of sync.	None specified	**MODIFICATION no MNR049** Re-number paragraphs from **3.49** on **page 29** to the end of the chapter.
Lancashire County Council		Not specified	Not specified	Not specified	It is anticipated that improvements will need to be made to Junction 4 of the M55 in order to accommodate the development of the strategic sites in this area, including resolving congestion and capacity issues, providing good public transport access and associated highways infrastructure, such as cycling and pedestrian access.	None specified	The following textual changes will be as Minor Modifications: **MODIFICATION no MNR050** Re-word **Paragraph 6.11**, as follows:

					6.11 –Please amend this section to read as follows: If a shortfall of pupil places has been identified at schools within the catchment of development, a contribution will be calculated. For primary schools, the contribution is based upon a bedroom yield per home. Please see table below. LCC seeks £13,474.53 per primary school place. BCIS All in Tender Price index is applied to the cost per place. (Education Contribution Methodology – May 2016). 6.12 - Please amend this section to read as follows: For secondary schools, the contribution is based upon a bedroom yield per home. Please see table below. LCC seek £20,303.59 per secondary school place. BCIS All in Tender Price index would be applied to the cost per place. Current bedroom yield information, based on 2012 research, is shown below. 6.12 – Before the table please add 'Figures for 2016 are: 6.16 – Please change the reference to calculations of contributions on 10 or more dwellings not 11 as previously stated. 6.17 – Row 9, amend the secondary figure of 787 to 709 secondary school places. 6.18 – 5th line – Amend 'Three of these areas' to 'Four of these areas'		*If a shortfall of pupil places has been identified at schools within the catchment of development, a contribution will be calculated. For primary schools, the contribution is based upon a bedroom yield per home. Please see table below. LCC seeks £13,474.53 per primary school place. BCIS All in Tender Price index is applied to the cost per place. (Education Contribution Methodology – May 2016).* **MODIFICATION no MNR051** Re-word **Paragraph 6.12**, as follows: *For secondary schools, the contribution is based upon a bedroom yield per home. Please see table below. LCC seek £20,303.59 per secondary school place. BCIS All in Tender Price index would be applied to the cost per place. Current bedroom yield information, based on 2012 research, is shown below.* **MODIFICATION no MNR052** Before the table after **Paragraph 6.12** please add *'Figures for 2016 are:* **MODIFICATION no MNR053** Amend **Paragraph 6.16** to read "…developments of ~~eleven~~ 10 or more homes, which……" **MODIFICATION no MNR054** Amend figure 787 in **Paragraph 6.17** to 709 (secondary school places). **MODIFICATION no MNR055** **A**mend the last sentence of **Paragraph 6.18** from ~~Three of these areas~~ to *Four of these areas…*

					6.20 – Amend date - several schools are at capacity as of 2015/16, namely 6.20 – Add to list of schools Heyhouses Endowed CE and Lytham CE. 6.21 The date of January 2013 needs to be updated. 6.23 – Amend final sentence back to previous Draft IDP, which read - LCC is working with Fylde Council to ensure that an appropriate site for a new secondary school is provided within the plan period. 6.24 the statement that it is Lancashire County Councils responsibility to provide a school for every school age resident in Lancashire is true however Lancashire do not have the authority to provide places in unitary authorities within Lancashire. If schools are on the periphery the choice of one school over another is parental preference. In support of cross boundary issues the proposed development at Whyndyke Farm will deliver a new primary school and would address demand from Lancashire and Blackpool		**MODIFICATION no MNR056** Amend the figure in **Paragraph 6.20** from ~~2014/15~~ to *2015/2016….* Add *Heyhouses Endowed CE* and *Lytham CE* **MODIFICATION no MNR057** Delete "…from January 2013…" from the **Paragraph 6.21.** **MODIFICATION no MNR058** Delete the last sentence of **Paragraph 6.23** to read LCC is working with Fylde Council to ensure that an appropriate site for a new secondary school is provided within the plan period. **MODIFICATION no MNR059** Amend **Paragraph 6.24** to read: "…. LCC is legally obliged to provide a school place for every child of school age, however they do not have the authority to provide places in Unitary Authorities within Lancashire. Therefore if there are schools on the periphery within Blackpool, the choice of one school over another would be down to parental preference. Therefore, cross-boundary considerations are important when determining the need for school places in the borough, particularly as there is also pressure on primary school places in Blackpool. The Fylde-Blackpool Periphery is predicted to have a significant shortfall of primary school places within the next five years. In support of cross boundary issues the proposed development at Whyndyke Farm (site) MUS2), will deliver a new primary school and would address demand from Lancashire and Blackpool.

					6.26 – Delete section as repeats section 6.25. 6.28 change the wording of this paragraph to remove the reference to the CE Primary School on Garstang Road as the proposed school relocation to a site in LCC ownership. The proposal to relocate the named school would not be in line with education needs. The issue of school capacity in the Kirkham Wesham will be constantly monitored as housing developments in the area are brought forward and contributions claimed from the developer to fund the future needs of education. 6.29 – Amend information from 3rd row – There are two schools over capacity, namely The Willows Catholic Primary School and St Joseph's Catholic Primary School. There are also two schools at capacity as of 2015/16, namely: Newton Bluecoat CE Primary School and Kirkham and Wesham Primary School. Medlar with Wesham CE Primary School is close to capacity. **Appendix 2 Education**, remove the reference to the new primary school on land at Mowbreck Lane, Wesham this is no longer a viable option. **Appendix 2 – Infrastructure Delivery Schedule, Page 76** - Within the table it is showing the new primary school to serve Queensway and a new primary school to serve Whyndyke Garden Village, both being wholly funded by Section 106 contributions. There is also a section that		**MODIFICATION no MNR060** Delete **Paragraph 6.26.** **MODIFICATION no MNR061** Amend **Paragraph 6.28** to read: *Kirkham and Wesham are predicted to have a shortfall of primary and secondary places within the next five years. Therefore, further primary and secondary school provision will be required if housing demand and/or births continue to increase. School capacity will be constantly monitored as housing developments in the area are brought forward and contributions claimed from the developer to fund the future needs of education.* **MODIFICATION no MNR062** Delete the last 2nd and 3rd sentences of **Paragraph 6.29** and replace with: *There are also two schools at capacity as of 2015/16, namely: Newton Bluecoat CE Primary School and Kirkham and Wesham Primary School. Medlar with Wesham CE Primary School is close to capacity.* **MODIFICATION no MNR063** **Appendix 2, page 87**, under **Education** delete row in reference to New primary school on land at Mowbreck Lane, Wesham. **MODIFICATION no MNR064** **Appendix 2, page 87**, under **Education** amend columns relating to **Anticipated Funding Source** and replace all boxes relating to Education with the following text:

					shows a new secondary school in Fylde, which also states wholly funded by Section 106 contributions. These S106 contributions are only a contribution towards the cost so I think we should be saying that the funding would be met by S106 contributions and funding from LCC's Basic Need allocation. **Appendix 2 Education**, add in cost primary £13,474,53 and Secondary £20,303,59 (adjusted by BCIS all in tender price index)		*Funding through Section 106/CIL contributions and other funding sources.* **MODIFICATION no MNR065** **Appendix 2, page 87**, under **Education** amend columns relating to **Cost** to read: *£13,474,53* (for Primary schools) *£20,303,59* (for Secondary school)

Habitats Regulations Assessment (HRA)							
Habitats Regulations Assessment (HRA)							
Natural England		Not specified	Not specified	Not specified	In general Natural England (NE) agrees with many of the conclusions of the HRA and welcomes the incorporation of the additional data as we previously advised. However, there is not a clear audit trail provided for the conclusions, and we are unable to provide advice on some allocations as we are unable to link them with the location map. There are several allocations which we believe require additional mitigation measures. We provide further detail on this below. In summary the HRA has identified Likely Significant Effect (LSE) but then not provided sufficient detail in the Appropriate Assessment (AA) to clearly set out how an adverse effect on site integrity will be avoided. If the HRA is relying on a policy to avoid impacts on the designated sites, it needs to ensure that the policy to which it is referring is definitive in what actions/obligations a developer will have to take at the project level to ensure that	None specified	NE have identified 3 additional sites that they consider should be screened in, but have not identified sites requiring additional mitigation measures, as stated. The Council has identified LSE on only one site (HSS4) and has stated that an AA is required and this is currently being produced by the developers, as NE are fully aware.

					adverse effects on site integrity are avoided. As NE previously stated, the HRA needs to provide as much detail as possible to demonstrate that impacts on designated sites can be avoided and thus ensure deliverability at a project level. The assessment in table 10 states: As a number of the development sites at the Strategic Locations for Development are located on agricultural land, impacts on species using land which could potentially constitute functionally linked land associated with European sites are possible. The evidence for this conclusion is not clear and it would be helpful to detail this more fully in the HRA so that an audit trail is provided. The conclusion triggers likely significant effect (LSE), which would mean there is the need for an AA; however the HRA continues: Sites associated with the Strategic Locations detailed in SL2 as outlined in Policy DLF1 could not confirm that no significant effects would occur, as such, the potential for LSE as a result of this overarching policy cannot be ruled out. Nevertheless, compliance with Policy ENV2 would ensure appropriate safeguards for protected European sites are incorporated into any proposed developments in these areas. This could include re-screening at the project-level, in order to update the bird information and to consider the implications of the detailed project proposals. This places heavy reliance on policy ENV2 and it appears contradictory to NE to identify impacts on the designated sites from one aspect of the plan and resolve this through reliance on another part of		This is not a conclusion but quite obviously a statement based on the type of land identified. It acts as a starting point which has been followed up by a site-by-site assessment, the findings of which are clearly laid out in Tables 11, 12 and 13. As stated in Paragraph 1.8, of the Local Plan (LP), the LP should be read as a whole and not as a series of separate policies, the same way in which it was assessed. The Council strongly disagree with this conclusion. Policy ENV2 acts as a failsafe, as, if at the screening stage LSE cannot be ruled out or identified, Policy ENV2 (and other policies within the LP) would ensure appropriate safeguards are in place to protect European sites etc. Again as previously stated the LP should be read as a whole and not as a series of separate policies, the same way in which it was assessed. And

					the plan. If the Council believes that policy ENV2 is able to negate LSE in the HRA then this should be explained more clearly. The HRA also states that impacts on the designated site could be avoided through re-screening at the project level – i.e. by deferring the assessment. It is only acceptable to rely on a later or lower tier appraisal as a mitigation measure if all of the following three criteria are met. a) The earlier, or higher tier, plan appraisal cannot reasonably predict the effects on a European site in a meaningful way; whereas b) The later or lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, retains sufficient flexibility over the exact location, scale or nature of the proposal to enable an adverse effect on site integrity to be ruled out (even if that would mean ultimately deleting the proposal); and c) The later or lower tier appraisal is required as a matter of law or Government policy, so it can be relied upon. Given that the locations are known and based on the evidence (bird data) the HRA of the plan concludes LSE, NE advises that the first two criteria are not met. Policy ENV2 states that there will be a Supplementary Planning Document (SPD), however it is unclear how this is currently progressing. We advise that it needs to be in place alongside the Local Plan and it should clearly define what mitigation measures will be applied to each of the allocations that have resulted in LSE, so this can be included in the AA as an identifiable mitigation measure. If reliance		again the screening process has identified only one LSE, which is currently undergoing an AA. Again the Council disagrees with NE's conclusions here. The Council have allocated sites and have identified only one site as LSE. Until an application is received how can the Council identify the precise nature, scale and specific location of development? All other sites where LSE is not ruled out are unknown, and therefore will rely on criteria-based Policy ENV3. The Council have consulted with key stakeholders on the scope and level of detail that should be included within the SPD, however the intended timetable has slipped slightly due to various issues including staff shortages and the prioritising of the LP to EiP stage. The Council will continue to progress the SPD following the EiP, in

					is to be placed on the SPD it is critical it is progressed as soon as possible. The sites detailed in tables 11 to 14 are very difficult to cross reference, it is recommended that the site references are clearly marked on the plans and sent back to NE for our advice and comment. From those it has been possible to identify we can confirm that ES2, ES3, HS40 should be screened in, although these are not labelled and this judgement is made on what we consider to be the correct sites. Not all the allocations appear to be included in the HRA. All the allocations need to be brought into the HRA to be screened. We recommend that you send a clear map with all the allocations and their references so there is a clear audit trail that they have all been assessed. In summary NE advises that additional work is required in the specific areas identified above. Once this has been done, we will be pleased to review the updated HRA document and are hopeful that we will be able to agree with the conclusions reached.		early 2017. The Council disagree with NE that the SPD should be written alongside the Plan. Any SPD will refer to adopted policies within the LP and therefore it is of greater importance to have an adopted LP in order to attach the SPD on positively prepared and up to date policies in line with National guidance and legislation. The sites are easily crossed referenced with the LP's Trajectory and from there the Council's website. In regards to the 3 sites identified by NE as sites that should be screened in: the Table on p83 clearly addresses the issues of why the sites ES2 and ES3 were not identified as LSE and site HS40 already has planning consent for 30 dwellings and as such is a committed site. This is incorrect – all allocations have been included within the HRA. In conclusion, this is a LP examination, if the NE consider the LP to be unsound if unchanged they should state what change is necessary in order for the LP to be found sound, in this case wording specific to Policy ENV2.

4. Summary statement of main issues

4.1 The following is intended as a summary of the issues raised in order to inform the Inspector's Matters and Issues.

1.	**Whether the Duty to Co-Operate is fulfilled, given the inclusion of 14 ha of employment land to assist Blackpool in meeting its requirement, and the late request from Wyre Council to provide an unspecified quantum land to assist in meeting its housing need.**
2.	**Whether the development strategy will result in delivery of the required housing number over the plan period, notwithstanding that over 60% of the housing requirement is through existing commitments.**
3.	**Whether the development strategy provides an appropriate balance of development between the various strategic and non-strategic locations, in view of the importance of directing development to sustainable locations.**
4.	**Whether the amount and location of employment land is appropriate to meet the needs of the borough, noting the inclusion of 14 ha for Blackpool's needs.**
5.	**Whether the housing requirement is too high, given the potential impact of development and the limits to deliverability, or too low, given the wide range of economic development forecasts.**
6.	**Whether the policies on density, mix, affordable housing, design and masterplanning are appropriate and avoid impacts on the viability of the plan.**
7.	**Whether adverse impacts on biodiversity are limited in accordance with the Framework, and particularly whether adverse effects on European sites are avoided or mitigated.**
8.	**Whether the necessary infrastructure can be delivered along with the plan.**

Appendix 1

Regulation 19 (pre-submission) consultation materials

Publication Version of the Fylde Local Plan to 2032

On 15 June 2016, the Development Management Committee approved the Publication Version of the Fylde Local Plan to 2032.

The Publication Version will be published for consultation for a six week period from 11 August 2016 to 5.00pm on 22 September 2016.

Representations are invited on the Publication Version of the Local Plan. The Publication Version is the version of the Local Plan which the Council wishes to adopt. Previously, the Council consulted on the **Revised Preferred Option** Local Plan, and representations received on that consultation and other earlier consultations have been taken into account in producing the Publication Version. Following this publication consultation, the Publication Version Local Plan will be submitted, together with the representations received in this publication consultation, to the Secretary of State for Examination in Public.

The proposed submission documents are:

- The Fylde Local Plan Publication Version;
- The Fylde Local Plan Policies Map;
- Kirkham Inset Map
- St Annes Inset Map
- Lytham Inset Map
- Public Open Space Map
- The Infrastructure Delivery Plan;
- The Sustainability Appraisal Main Report;
- The Sustainability Appraisal Non Technical Summary;
- The Sustainability Appraisal Report - Appendices;
- The Habitats Regulations Assessment;
- The Viability Assessment;
- The Fylde Statement of Compliance - Duty to Cooperate;
- The Health Impact Assessment;
- The Rural Proofing Assessment;
- The Statement of Representations Made Under Regulation 18; and (Statement of Consultation)
- Evidence documents referred to in the Local Plan

Comments can be made via the representation form (see below) or via the Council's on-line consultation system which can be accessed **here**. If you are using the on-line consultation system and your comments are extensive, it may be advisable to type these into a word editor first and copy and paste into the system when complete.

Any representation should be made in accordance with the **Statement of Representations Procedure** available below, please also read the Guidance Notes on Legal Compliance and the Test of Soundness also

Related Downloads

- Public Open Space August 2016 (852KB)
- The Fylde Local Plan Policies Map (19.9MB)
- Representation Form - Word Version (39KB)

Also of Interest

- Adopted Fylde Borough Local Plan As Altered (October 2005)
- Local Plan to 2032: Consultations

available below:

- Statement of Representations Procedure
- Guidance Notes on Legal Compliance and the Test of Soundness
- Consultation Letter
- Representation Form - PDF Version
- Representation Form - Word Version

The policies set out in the Publication Version of the plan will be used in determining planning applications alongside the saved policies of the Fylde Borough Local Plan (2005).

Further information

If you require any further information or have a query about any aspect of the Local Plan, please contact the Planning Policy Team on 01253 658418 or email **planningpolicy@fylde.gov.uk**

© Copyright Fylde Borough Council

Publication Version Local Plan
Representation Form

Ref:

Date Received:

Date acknowledged:

(For official use only)

Name of the Local Plan to which this representation relates: **Publication Version Fylde Local Plan to 2032**

Please return to Fylde Borough Council by **5pm** on **Thursday 22 September 2016**

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph		Policy		Policies Map	

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	
4.(3) Complies with the Duty to cooperate	Yes		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to cooperate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any noncompliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

	No, I do not wish to participate at the oral examination		**Yes**, I wish to participate the oral examination

Please tick as appropriate

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

9. Signature:		Date:	

Data Protection

Your personal contact details will not be released to any third parties and will only be used for the purposes of the Fylde Local Plan. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.

If you want this information in large print, audio, Braille or another language please call 01253 658658

Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: August 2016

Dear Sir/Madam

Fylde Local Plan Publication Version: Public Consultation

Town and Country Planning (Local Planning) (England) Regulations 2012
Regulations 19

This is to notify you that the Fylde Local Plan Publication Version will be published for consultation, along with accompanying documents, for a six week period from **11th August 2016 to 5.00pm on 22nd September 2016**.

The Council has prepared a Local Plan which will guide development in the borough to 2032. It includes land allocations for new homes and employment, and development management policies, which will inform decisions on planning applications.

Representations are invited on the Publication Version of the Local Plan. The Publication Version is the version of the Local Plan which the Council wishes to adopt. Previously, the Council consulted on the Revised Preferred Option Local Plan, and representations received on that consultation and other earlier consultations have been taken into account in producing the Publication Version. Following this publication consultation, the Publication Version Local Plan will be submitted, together with the representations received in this publication consultation, to the Secretary of State for Examination in Public.

The proposed submission documents are:

- The Fylde Local Plan Publication Version;
- The Fylde Local Plan Policies Map;
- The Infrastructure Delivery Plan;
- The Sustainability Appraisal;
- The Habitats Regulations Assessment;
- The Viability Assessment;
- The Fylde Statement of Compliance – Duty to Cooperate;
- The Health Impact Assessment;
- The Rural Proofing Assessment; and
- The Statement of Representations Made Under Regulation 18; and
- Evidence documents referred to in the Local Plan (electronically only)

All of the documents above are available for inspection at www.fylde.gov.uk/localplan/ at Fylde Direct at 292 Clifton Drive North, St Annes, FY8 1LH and at libraries throughout the borough.

Any representation should be made in accordance with the **Statement of Representations Procedure** which accompanies this letter.

You are receiving this letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01253 658418 or email planningpolicy@fylde.gov.uk

Yours faithfully,

Julie Glaister
Planning Policy Manager

Statement of Representations Procedure and Availability of Documents

Town and Country Planning (Local Planning) (England) Regulations 2012 - Regulation 19

Title of Document

Publication Version of the Fylde Local Plan to 2032.

Subject matter and area covered

Fylde Borough Council has prepared the Publication Version of the Fylde Local Plan to 2032 for submission to the Secretary of State for Communities and Local Government. The Local Plan sets out the broad spatial planning and policy framework for Fylde borough up to 2032. The Local Plan includes the Council's vision and ambitions for the future of Fylde borough with strategic objectives, policies and site allocations to meet the development targets. It identifies the level of development over the plan period together with the locations where development should go.

Period of publication for representations

Representations are invited on the Publication Version of the Fylde Local Plan to 2032 for a period of six weeks, ending at **5pm** on **Thursday 22 September 2016**. This statement provides details on how to make representation.

Where to view the documents (statement of fact)

Until 5pm on Thursday 22 September 2016, copies of the Publication Version of the Fylde Local Plan to 2032 and its accompanying documents, including the representation form, will be available to view on the Council's website at www.fylde.gov.uk/localplan and will also be available for inspection at Fylde Direct (hard copy) and at libraries during office hours (excluding Bank Holidays). Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

Representations

Representations should be made on the representation form or via the Council's consultation system, which can be accessed at www.fylde.gov.uk/localplan. The use of the standard representation form is strongly recommended as this will ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector. If you are objecting to the Publication Version Local Plan and wish to speak at the examination, it is imperative that you make this clear on your representation form.

Representation forms are available from the Council offices reception. The representation form can be completed on-line at www.fylde.gov.uk/localplan or downloaded from the Council's website at www.fylde.gov.uk/localplan. A paper copy can also be provided by phoning 01253 658418 or by emailing planningpolicy@fylde.gov.uk

Completed forms can be submitted on-line, returned by email to planningpolicy@fylde.gov.uk or posted to:

FREEPOST RTKH-UZKY-CRXZ
Publication Version Consultation
Planning Policy
Fylde Council
Town Hall
St Annes
Lancashire
FY8 1LW

Where requested, all named representatives will be notified of future stages.

Please note that copies of all comments received will be available for the public to view and cannot be treated as confidential.

All comments received will be submitted to the Secretary of State for Communities and Local Government and considered as part of a public examination by an independent Planning Inspector.

Data will be processed and held in accordance with the Data Protection Act 1998.

Notification request

Using the representation form you can request to be notified at an address or email address of any of the following:

- The submission of the Publication Version of the Fylde Local Plan to 2032 to the Secretary of State for Communities and Local Government for independent examination
- Publication of the Planning Inspector's Report on the Publication Version of the Fylde Local Plan to 2032
- Adoption of the Fylde Local Plan to 2032

For further information, please contact the Planning Policy Team on 01253 658418 or planningpolicy@fylde.gov.uk

The relevant regulations are the Town and Country Planning (Local Planning) (England) Regulations 2012.

Publication Version Fylde Local Plan to 2032

Guidance Notes on Legal Compliance and the Test of Soundness

1. Introduction

1.1. This Guidance Note has been produced to help you complete the 'Publication Version Fylde Local Plan to 2032 Response Form' to ensure that your comments can be considered as fully as possible during the plan-making process.

1.2. Please contact us if you need any further advice or have any questions. Our contact details are at the end of this document.

1.3. The Plan is published in order for representations to be made prior to submission. The representations will be considered alongside the published plan when submitted, which will be examined by a Planning Inspector. The Planning and Compulsory Purchase Act 2004[1] (as amended) (PCPA) states that the purpose of the examination is to consider whether the plan complies with the legal requirements, the duty to co-operate and is sound.

2. Legal Compliance and Duty to Co-operate

2.1. The Inspector will first check that the plan meets the legal requirements under s20(5)(a) and the Duty to cooperate under s20(5)(c) of the PCPA before moving on to tests for soundness.

2.2. You should consider the following before making a representation on legal compliance:

- The Plan in question should be included in the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents (LDDs) [18] it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for independent examination. If the Plan is not in the current LDS it

[1] View at http://www.legislation.gov.uk/ukpga/2004/5/contents [18]
LDDs are defined in regulation 5 – see link below.

should not have been published for representations. The LDS should be on the LPA's website and available at its main offices.

- The process of community involvement for the plan in question should be in general accordance with the LPA's Statement of Community Involvement (SCI) (where one exists). The SCI sets out the LPA's strategy for involving the community in the preparation and revision of LDDs (including plans) and the consideration of planning applications.

- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations)[2]. On publication, the LPA must publish the documents prescribed in the Regulations, and make them available at its principal offices and on its website. The LPA must also notify the various persons and organisations set out in the Regulations and any persons who have requested to be notified.

- The LPA is required to provide a Sustainability Appraisal Report when it publishes a plan. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.

2.3. You should consider the following before making a representation on compliance with the Duty to cooperate:

- The Duty to cooperate came into force on 15 November 2011 and any plan submitted for examination on or after this date will be examined for compliance. LPAs will be expected to provide evidence of how they have complied with any requirements arising from the duty.

- The PCPA establishes that non-compliance with the duty to cooperate cannot be rectified after the submission of the plan. Therefore the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector has no choice but to recommend non-adoption of the plan.

3. Soundness

3.1. Soundness is explained in paragraph 182 of the National Planning Policy Framework (NPPF). The Inspector has to be satisfied that the plan is positively prepared, justified, effective and consistent with national policy:

- ***Positively prepared:*** This means that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure

[2] View at http://www.legislation.gov.uk/uksi/2012/767/contents/made

requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

• ***Justified****:* The plan should be the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.

• ***Effective:*** The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

• ***Consistent with national policy:*** The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

• Is the issue with which you are concerned already covered specifically by national planning policy (or the London Plan)? If so it does not need to be included?

• Is what you are concerned with covered by any other policies in the plan on which you are seeking to make representations or in any other plan?

• If the policy is not covered elsewhere, in what way is the plan unsound without the policy?

• If the plan is unsound without the policy, what should the policy say?

4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should make clear in what way the plan or part of the plan is inadequate having regard to legal compliance, the Duty to cooperate and the four requirements of soundness set out above. You should try to support your representation by evidence showing why the plan should be modified. It will be helpful if you also say precisely how you think the plan should be modified. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

4.2. Where there are groups who share a common view on how they wish to see a plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

5. Further Information

5.1. Further guidance on the preparation, publication and examination of Development Plans is provided in the National Planning Policy Framework (NPPF), which can be found at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

5.2. Alternatively, you can contact the Planning Policy Team by email on 01253 658418 or planningpolicy@fylde.gov.uk

Text of Advert

Town and Country Planning (Local Planning) (England) Regulations 2012
Regulations 19

Fylde Local Plan Publication Version
Public Consultation
11th August 2016 to 5.00pm on 22nd September 2016

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Any representation should be made in accordance with the **Statement of Representations Procedure** which is available to view at www.fylde.gov.uk/localplan/

Mark Evans
Head of Planning and Regeneration
11th August 2016