



Meeting Agenda

Planning Policy Scrutiny Committee
Town Hall, St Annes
5th June 2008, 19:00pm

The main doors to the Town Hall will be open to the public at 6:40pm

The maximum capacity for this meeting room is 60 persons –
once this limit is reached no other person can be admitted.

PLANNING POLICY SCRUTINY COMMITTEE

MEMBERSHIP

CHAIRMAN - Councillor John Bennett
VICE-CHAIRMAN – Councillor William Thompson

Councillors

Ben Aitken	George Caldwell
Michael Cornah	Trevor Fiddler
Keith Beckett	Maxine Chew
Lyndsay Greening	

Contact: Lyndsey Lacey, St. Annes (01253) 658504,
Email: lyndseyl@fylde.gov.uk



CORPORATE OBJECTIVES

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

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

CORE VALUES

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

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



A G E N D A

PART I - MATTERS DELEGATED

ITEM	PAGE
1. DECLARATIONS OF INTEREST: <i>If a member requires advice on Declarations of Interest he/she is advised to contact the Legal Services Executive Manager in advance of the meeting. (For the assistance of Members an extract from the Councils Code of Conduct is attached).</i>	4
2. CONFIRMATION OF MINUTES: <i>To confirm as a correct record the Minutes of the Planning Policy meeting held on 10 April 2008 attached at the end of the agenda.</i>	4
3. SUBSTITUTE MEMBERS: <i>Details of any substitute members notified in accordance with council procedure rule 26.3</i>	4
4. STRATEGIC FLOOD RISK ASSESSMENT	7 – 13
5. ALTERATIONS REVIEW TO THE FYLDE BOROUGH LOCAL PLAN – SAVED POLICIES	14 – 23
6. INTERIM HOUSING POLICY	24 – 200
7. PLANNING OBLIGATIONS	201 – 206
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Personal interests

8.—(1) You have a personal interest in any business of your authority where either—

(a) it relates to or is likely to affect—

- (i) any body of which you are a member or in a position of general control or management and to which you are appointed or nominated by your authority;
- (ii) any body—
 - (aa) exercising functions of a public nature;
 - (bb) directed to charitable purposes; or
 - (cc) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union),

of which you are a member or in a position of general control or management;

- (i) any employment or business carried on by you;
 - (ii) any person or body who employs or has appointed you;
 - (iii) any person or body, other than a relevant authority, who has made a payment to you in respect of your election or any expenses incurred by you in carrying out your duties;
 - (iv) any person or body who has a place of business or land in your authority's area, and in whom you have a beneficial interest in a class of securities of that person or body that exceeds the nominal value of £25,000 or one hundredth of the total issued share capital (whichever is the lower);
 - (v) any contract for goods, services or works made between your authority and you or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi);
 - (vi) the interests of any person from whom you have received a gift or hospitality with an estimated value of at least £25;
 - (vii) any land in your authority's area in which you have a beneficial interest;
 - (viii) any land where the landlord is your authority and you are, or a firm in which you are a partner, a company of which you are a remunerated director, or a person or body of the description specified in paragraph (vi) is, the tenant;
 - (xi) any land in the authority's area for which you have a licence (alone or jointly with others) to occupy for 28 days or longer; or
- (b) a decision in relation to that business might reasonably be regarded as affecting your well-being or financial position or the well-being or financial position of a relevant person to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the ward, as the case may be, affected by the decision;

(2) In sub-paragraph (1)(b), a relevant person is—

- (a) a member of your family or any person with whom you have a close association; or
- (b) any person or body who employs or has appointed such persons, any firm in which they are a partner, or any company of which they are directors;
- (c) any person or body in whom such persons have a beneficial interest in a class of securities exceeding the nominal value of £25,000; or
- (d) any body of a type described in sub-paragraph (1)(a)(i) or (ii).

Disclosure of personal interests

- 9.—**(1) Subject to sub-paragraphs (2) to (7), where you have a personal interest in any business of your authority and you attend a meeting of your authority at which the business is considered, you must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.
- (2) Where you have a personal interest in any business of your authority which relates to or is likely to affect a person described in paragraph 8(1)(a)(i) or 8(1)(a)(ii)(aa), you need only disclose to the meeting the existence and nature of that interest when you address the meeting on that business.
- (3) Where you have a personal interest in any business of the authority of the type mentioned in paragraph 8(1)(a)(viii), you need not disclose the nature or existence of that interest to the meeting if the interest was registered more than three years before the date of the meeting.
- (4) Sub-paragraph (1) only applies where you are aware or ought reasonably to be aware of the existence of the personal interest.

- (5) Where you have a personal interest but, by virtue of paragraph 14, sensitive information relating to it is not registered in your authority's register of members' interests, you must indicate to the meeting that you have a personal interest, but need not disclose the sensitive information to the meeting.
- (6) Subject to paragraph 12(1)(b), where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must ensure that any written statement of that decision records the existence and nature of that interest.
- (7) In this paragraph, "executive decision" is to be construed in accordance with any regulations made by the Secretary of State under section 22 of the Local Government Act 2000(d).

Prejudicial interest generally

- 10.—**(1) Subject to sub-paragraph (2), where you have a personal interest in any business of your authority you also have a prejudicial interest in that business where the interest is one which a member of the public with knowledge of the relevant facts would reasonably regard as so significant that it is likely to prejudice your judgement of the public interest.
- (2) You do not have a prejudicial interest in any business of the authority where that business—
- (a) does not affect your financial position or the financial position of a person or body described in paragraph 8;
 - (b) does not relate to the determining of any approval, consent, licence, permission or registration in relation to you or any person or body described in paragraph 8; or
 - (c) relates to the functions of your authority in respect of—
 - (i) housing, where you are a tenant of your authority provided that those functions do not relate particularly to your tenancy or lease;
 - (ii) school meals or school transport and travelling expenses, where you are a parent or guardian of a child in full time education, or are a parent governor of a school, unless it relates particularly to the school which the child attends;
 - (iii) statutory sick pay under Part XI of the Social Security Contributions and Benefits Act 1992, where you are in receipt of, or are entitled to the receipt of, such pay;
 - (iv) an allowance, payment or indemnity given to members;
 - (v) any ceremonial honour given to members; and
 - (vi) setting council tax or a precept under the Local Government Finance Act 1992.

Prejudicial interests arising in relation to overview and scrutiny committees

- 11.—** You also have a prejudicial interest in any business before an overview and scrutiny committee of your authority (or of a sub-committee of such a committee) where—
- (a) that business relates to a decision made (whether implemented or not) or action taken by your authority's executive or another of your authority's committees, sub-committees, joint committees or joint sub-committees; and
 - (b) at the time the decision was made or action was taken, you were a member of the executive, committee, sub-committee, joint committee or joint sub-committee mentioned in paragraph (a) and you were present when that decision was made or action was taken.

Effect of prejudicial interests on participation

- 12.—**(1) Subject to sub-paragraph (2), where you have a prejudicial interest in any business of your authority—
- (a) you must withdraw from the room or chamber where a meeting considering the business is being held—
 - (i) in a case where sub-paragraph (2) applies, immediately after making representations, answering questions or giving evidence;
 - (ii) in any other case, whenever it becomes apparent that the business is being considered at that meeting;
 unless you have obtained a dispensation from your authority's standards committee;
 - (b) you must not exercise executive functions in relation to that business; and
 - (c) you must not seek improperly to influence a decision about that business.
- (2) Where you have a prejudicial interest in any business of your authority, you may attend a meeting (including a meeting of the overview and scrutiny committee of your authority or of a sub-committee of such a committee) but only for the purpose of making representations, answering questions or giving evidence relating to the business, provided that the public are also allowed to attend the meeting for the same purpose, whether under a statutory right or otherwise.

REPORT

REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	5 TH JUNE 2008	4

STRATEGIC FLOOD RISK ASSESSMENT

Public Item

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

Summary

Wyre Borough Council have carried out a Strategic Flood Risk Assessment (SFRA) on behalf of Fylde Borough Council in accordance with Planning Policy Statement 25 (PPS25). This Council has now received an advanced draft of the document. The area covered by the assessment includes the whole borough but concentrates on the Strategic Development areas as shown on the map in Appendix 1. The SFRA will form an essential part of the pre-production/evidence gathering stage of the Local Development Framework process.

Recommendations:

1. That Members note the findings of the Draft Strategic Flood Risk Assessment as part of the evidence base for the Local Development Framework.
2. That the document be made publicly available as soon as final amendments are made to the format and an executive Summary has been prepared.

Report

Background

All forms of flooding and their impact on the natural and built environment are material planning considerations within the planning process. PPS 25 requires that planning authorities take flood risk into account at all stages of the planning process to avoid inappropriate development in areas at risk of flooding. Where new development is exceptionally necessary in such areas, appropriate action and mitigation should be taken to make it safe without increasing the risk elsewhere and where possible reducing overall risk.

Planning Policy Statement 25 (PPS 25) requires Local Planning Authorities to produce Strategic Flood Risk Assessments. Wyre Borough Council was commissioned by this Council to produce the Strategic Flood Risk Assessment in accordance with PPS 25. The area covered by the assessment covers the whole borough but concentrates on the potential strategic development areas shown in Appendix One.

The SFRA will form an essential part of the pre- production/evidence gathering stage of the Local Development Framework process.

The main stages in the development of the SFRA are:

- The identification of the Flood Zones for the area.
- The identification of potential sources and pathways of flooding using appropriate techniques.
- Examination of future development proposals, including sequential testing and the application of exemption testing where appropriate.
- Identification of residual flood risk and appropriate mitigation measures.
- adoption.

Sequential and Exception Tests

PPS 25 states that Local Planning Authorities in allocating land should apply a sequential test to demonstrate that no reasonably available sites are available which have a lower probability of flooding that would be appropriate for the development.

The policies in PPS 25 therefore require that throughout all stages of the development planning process both the nature and the spatial distribution of flood risk and the degree of vulnerability of different types of development should be assessed and the philosophy of managing flood risk through avoidance/prevention should be reinforced. This SFRA provides a framework on which an informed sequential test and understanding of flood risk throughout the borough can be based.

PPS 25 requires that planners and developers do not simply match land use types to areas or zones with an acceptable degree of flood risk. Rather a sequential approach to location of new development is required, by application of the sequential test.

The overall aim of development should be to steer development to Flood Zone 1.

Where there are no reasonably available sites in Flood Zone 1, decision makers identifying broad locations for development and infrastructure and allocating land in spatial plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the exception test if required.

Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision makers consider suitability of sites in Flood Zone 3, taking into account the flood vulnerability of land uses and applying the exception test if required. Within Fylde it is recommended only development meeting criteria for suitability within the exception test will be considered within flood zone 3.

Exception Test

The exception test makes provision for sites where flood risk is outweighed by wider sustainability considerations and is designed to ensure that the flood risk posed to such sites is controlled and mitigated to an acceptable level taking account of climate change, without increasing flood risk elsewhere.

Where it is necessary, following application of the Sequential Test, to locate new development in Flood Zones 2 and 3, such development should be focussed within areas where:

- The preferred policy in the relevant Catchment Flood Management or Shoreline Management Plan is to 'hold the line'
- The standard of protection afforded by existing defences is compatible with the land uses proposed
- Application of the sequential approach has been used to identify the areas within the development area that are at least risk
- Flood forecasting and warning systems, as well as flooding emergency response procedures are well-developed

In the application of this the SFRA has identified flood risk zones within the borough and has assessed the potential of various possible development sites. This has created a hierarchy of preferred development sites in line with the sequential approach identified in PPS 25.

The map and table in Appendix One show the development sites which have been assessed by the SFRA.

It should be noted that the SFRA is not a policy document but provides evidence in respect of sites which may be put forward for development.

The Environment Agency has been consulted on the document. A number of amendments requested by the Agency have been incorporated into the document.

The full Draft SFRA can be viewed at ????????????

The draft document has been brought to Committee at this stage since it is committed in the PPSC Work Program and a number of bodies are requesting sight of the document. The next meeting of PPSC is not until 9th October 2008.

Work to complete the document relates mainly to formatting and the production of an Executive Summary.

IMPLICATIONS	
Finance	None identified at this stage. If the Council had to make any future financial provision then a full detailed report would be presented to members
Legal	None
Community Safety	Flooding has serious implications for Community Safety
Human Rights and Equalities	None
Sustainability	It is sustainable to locate new development in areas which are not at risk of flooding
Health & Safety and Risk Management	Flooding presents a serious risk to health and safety

Report Author	Tel	Date	Doc ID
Name of author Julie Glaister	(01253) 658687	Date of report 21 st May 2008	

List of Background Papers		
Name of document	Date	Where available for inspection
Strategic Flood Risk Assessment	June 2008	Planning Policy Office

Attached documents

Appendix One
Map and Table

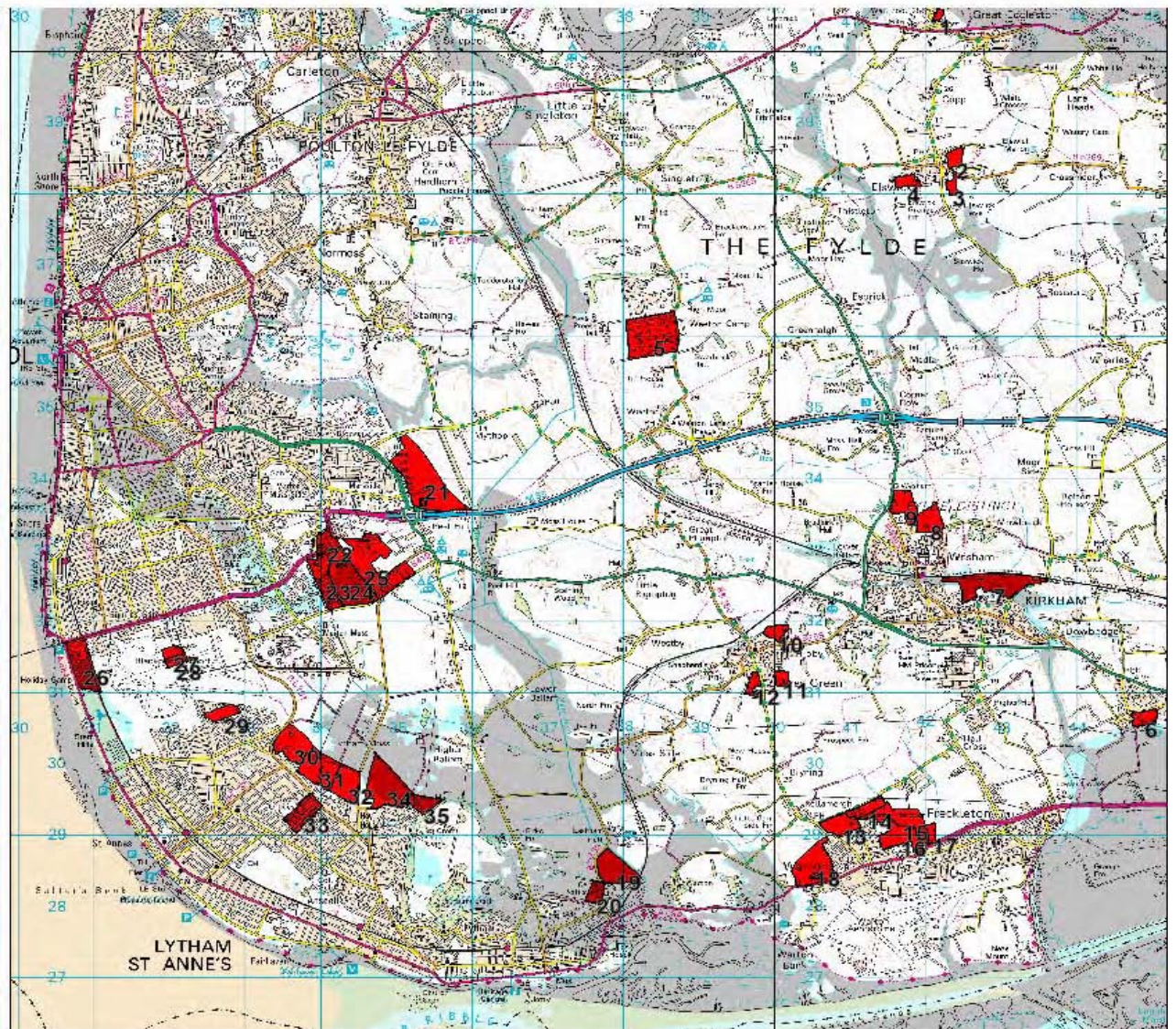
Strategic Flood Risk Assessment Committee Report - Appendix 1

Recommended Policies for Development Area

Area	Flood Zone	Map Location	Recommended Policy
Blackpool Airport Elswick Blackpool Road playing fields Wesham Little Eccleston Newton-with-Scales Warton Freckleton Wrea Green Weeton Whyndyke Farm Marton Moss south and east Lytham Moss Heyhouses Lane	1	27,28 2,3,4 29 8,9 1 6 13,14,15, 16,18 17 10,11,12 5 21 22,25 30,31,32, 33	There are no material flood issues within this area. Therefore there should not be any restriction on flooding grounds for development of all types within the area. Consideration to surface water runoff should be given in all cases.
Marton Moss Pontins	2	23,24 26	Development of all types should be allowed within this area. All proposed development should be supported by a site-specific flood risk assessment. For the development to be acceptable ground levels, will require raising and properties must be flood proofed against low levels of flooding. Consideration to emergency warning and response including safe access routes should be given in all cases.
Lytham Lytham Moss Kirkham	3a	19,20 34,35 7	Only appropriate development should be permitted within this area. Residential development would normally be resisted unless the exception test was proved. Developers may wish to raise all proposed development land above the 6.5m contour or demonstrate that development is above 1 in 200 year threshold as proved by modelling. All proposed development should be supported by a site-

			specific flood risk assessment. This should demonstrate that appropriate mitigation measures are provided. As a minimum this should include the safeguarding and enhancing of watercourses and the areas around them (a minimum of 10m from edge of bank). Where land levels are to be raised to prevent flooding to the development, further modelling should be undertaken to ensure that these measures are suitable and do not increase flood risk elsewhere. Where it is impracticable to raise land levels to prevent flooding, the SSFRA should consider alternative, non-habitable uses for lower floor rooms, together with flood proofing. Consideration to emergency warning and response including safe access routes should be given in all cases. Developers should also provide details of contributions to improving both coastal and estuary defences to ensure sustainability of the site in the long term.
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Detailed considerations of flood risk and potential mitigation measures have been prepared for each of the sub Strategic Development Areas above.



REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	5 TH JUNE 2008	5

ALTERATIONS REVIEW TO THE FYLDE BOROUGH LOCAL PLAN – SAVED POLICIES

Public Item

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

Summary

To seek the Committee's approval on those policies, introduced in the Alterations Review to the Fylde Borough Local Plan, which are to be saved beyond 9th October 2008.

Recommendation

1. To note the list of saved local plan policies, attached as Appendix 1 to this report, and recommend to Council that it be formally submitted to Government Office for the North West.

Cabinet Portfolio

The item falls within the following Cabinet portfolio:

Development and Regeneration (Councillor Roger Small)

Report

1. Background

- 1.1 The Planning and Compulsory Purchase Act 2004, provides for the saving of policies in adopted local plans for a period of 3 years from the commencement date of the Act, which was 28th September 2004, or for a period of 3 years from their adoption.
- 1.2 The intention behind extending the lifetime of the saved policies is to avoid a policy vacuum. When the Secretary of State issues a direction to save particular policies

they will be operative until such time as they are replaced by policies within the Local Development Framework.

- 1.3 Those policies in the Fylde Borough Local Plan 1996 – 2006 which were adopted on 19th May 2003, were saved until 27th September 2007. Members will recall that these were the subject of an application for a direction under paragraph 1(3) of Schedule 8 to the Planning and Compulsory Purchase Act 2004. The Secretary of State issued a Direction in respect of those policies on 18 September 2007. Those policies not listed in the Direction (namely policy TR9 : Car Parking Within New Developments) expired on 27th September 2007.
- 1.4 In March this year the Secretary of State issued a Direction in respect of policies in the Joint Lancashire Structure Plan (JLSP) 2001 – 2016. All policies in the JLSP were directed to be saved. Those policies introduced by the Alterations Review to the Fylde Borough Local Plan are in general conformity with the JLSP.

2. Current Consideration

- 2.1 The nine policies introduced in the Alterations Review to the Fylde Borough Local Plan were adopted on 10th October 2005, and they remain saved until 9th October 2008.
- 2.2 If we wish to retain any of the policies introduced in the Alterations Review to the Fylde Borough Local Plan we will need to seek the Secretary of State's agreement to issue a direction to save them. We are therefore required to submit a list of policies to be saved beyond 9th October 2008 to Government Office North West (GONW) in advance of that date. Council will therefore need to consider the list of saved policies, at its meeting on 28th July 2008.
- 2.3 The matrix which is included as Appendix 1 to this report relates to the nine policies which are the subject of the current consideration. At the time of writing the report the matrix proposes that all nine saved policies be extended beyond the 3 year saved period, with reasons stated.
- 2.4 The Secretary of State's assessment of whether saved policies should be extended is based upon the criteria set out in Planning Policy Statement 12 and the Department for Communities and Local Government Protocol on saving policies. PPS12 paragraph 5.15, states that policies to be extended should comply with the following criteria:-
 - i. where appropriate, there is a clear central strategy;
 - ii. the policies have regard to the Community Strategy for the area;
 - iii. the policies are in general conformity with the regional spatial strategy or spatial development strategy;
 - iv. the policies are in conformity with the core strategy development plan document (where the core strategy has been adopted);
 - v. there are effective policies for any parts of the authority's area where significant change in the use or development of land or conservation of the area is envisaged; and

vi. the policies are necessary and do not merely repeat national or regional policy.

- 2.5 The matrix which is included as Appendix 1 to this report addresses the above mentioned criteria individually for each local plan policy. It should be noted that criterion iii above relates to adopted RPG13. The column entitled 'Other' refers to additional factors, to which the government will also have particular regard. The column entitled 'Save' in the matrix identifies whether or not it is proposed to save the policy concerned. In addition to the above it was considered pertinent to consider whether or not the policies are in general conformity with emerging Regional Spatial Strategy (RSS). Whilst it is unlikely that emerging RSS will be adopted before Council can consider the list of saved policies, at its meeting on 28th July 2008, it is however possible that draft RSS will be adopted before 9th October 2008. When draft RSS for the North West of England is adopted certain local plan policies will not be in conformity with it.
- 2.6 In preparing the proposed list of saved policies your officers have been in dialogue with GONW. Consequently at the time of writing this report it is considered appropriate to save all policies introduced in the Alterations Review to the Fylde Borough Local Plan. Particular attention is drawn to policy HL1 as it is in general conformity with the JLSP and RSS policies UR7 & UR9. However when draft RSS for the North West of England is adopted, this policy will no longer be relevant. GONW have therefore agreed to us including a caveat in our application to them, to the effect that we need not save policy HL1 when draft RSS is adopted. When adopted draft RSS will form part of the development plan. Other regional, sub-regional, local plans and strategies (including LDDs and SPDs) should adhere to the principles established in the final North West RSS. Thus the Interim Housing Policy which this Council is preparing has due regard to emerging RSS.
- 2.7 The Committee is asked to note the proposed list of saved local plan policies, attached as Appendix 1 to this report, and recommend to Council that the list be formally submitted to Government Office for the North West.

IMPLICATIONS	
Finance	None arising directly from the report.
Legal	The Local Plan is a key document in promoting the Council's plans, policies and objectives for spatial planning. It represents the statutory planning framework which meets national, regional and local requirements and priorities until such time as it is replaced by a Local Development Framework. If policies were not saved there would be a policy vacuum.
Community Safety	None arising directly from the report.
Human Rights and Equalities	None arising directly from the report.
Sustainability	None arising directly from the report.
Health & Safety and Risk	None arising directly from the report.

Management	
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Report Author	Tel	Date	Doc ID
Mark Sims	(01253) 658656	May 2008	

List of Background Papers		
Name of document	Date	Where available for inspection
Report : Planning Policy Scrutiny Committee : LDF Saved Policies	8 TH FEBRUARY 2007	Planning Policy Section Town Hall St. Annes
Report : Council: LDF Saved Policies	26 th MARCH 2007	Planning Policy Section Town Hall St. Annes

Attached documents

1 APPENDIX 1 : ALTERATION REVIEW LOCAL PLAN POLICIES – WHICH ARE TO BE SAVED BEYOND THE 3 YEAR SAVED PERIOD

**FYLDE BOROUGH COUNCIL
ALTERATION REVIEW LOCAL PLAN POLICIES – WHICH ARE TO BE
SAVED BEYOND THE 3 YEAR SAVED PERIOD**

May 2008

FYLDE BOROUGH COUNCIL
ALTERATION REVIEW LOCAL PLAN POLICIES WHICH ARE TO BE
SAVED BEYOND THE 3 YEAR SAVED PERIOD

The Alterations Review to the Fylde Borough Local Plan was adopted on 10th October 2005. The policies introduced in the Alterations Review are therefore saved until 9th October 2008. We are required to write to GONW in respect of their being saved beyond 9th October 2008.

The table below identifies those policies which are to be saved.

The references (i) – (vi) refer to the criteria included in PPS12 para 5.15. Each of the criteria has been considered as follows:-

(i) This is understood to mean that the Fylde Borough Local Plan has a clear central strategy and that the policies to be extended are in line with that strategy.

(ii) 'A Vision for Fylde : Community Plan 2003 - 2013' is the Community Strategy for the area. Its six themes are referenced in brackets below, where relevant.

(iii) Regional Planning Guidance for the North West, RPG13 (March 2003) is now referred to as Regional Spatial Strategy (RSS). Consequently, it is this document against which conformity has been considered.

(iv) Fylde Borough Council does not have an adopted core strategy development plan document. An assessment has therefore not been made in this respect for any of the policies. Consequently 'N/A' appears in the table.

(v) This is understood to mean that we can justify the extending a policy's life if it is needed to guide development in areas where significant change is envisaged or where conservation is needed.

(vi) A reasoned justification is given as to the how necessary a policy is felt to be.

'Other' refers to additional factors, which the government will also have particular regard to; as stated in the DCLG protocol for requesting the extension of saved policies, which was issued to local authorities on 11 August 2006.

ALTERATION REVIEW LOCAL PLAN POLICIES – WHICH ARE TO BE SAVED

Policy Title/Ref	PPS12 Criteria						Other	Save
	(i)	(ii)	(iii)	(iv)	(v)	(vi)		
HL1 : The Quantitative Housing Issue/Affordable Housing	Is in conformity with central strategy of the FBLP. Key strategic policy. Provides for housing in a way that best serves all sections of the community.	Directly relates to 'An enhanced built environment...' (Protecting and Enhancing the Environment).	Conforms to RSS policies UR7 & UR9.	N/A	Effective policy specific to Fylde.	This is a necessary local policy. If this policy is not saved there would be no guidance relevant to ensuring that where such development requires planning permission it is carried out in an acceptable way. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Remains relevant, until such time as draft RSS is adopted.	Yes, until draft RSS for the North West of England is adopted.
HL2 : Development Control Criteria for Housing Proposals	Is in conformity with central strategy of the FBLP. Aims to maintain and improve the quality of environment throughout the borough having primary regard to sustainability objectives.	Directly relates to 'An enhanced built environment...' (Protecting and Enhancing the Environment).	Conforms to RSS policy DP3.	N/A	Supports the objectives of sustainable development.	This is a necessary local policy. If this policy is not saved there would be no guidance relevant to sustainably controlling housing proposals. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Remains relevant.	Yes.
HL3 : Rural Exception Site Affordable Housing	Is in conformity with central strategy of the FBLP. Key strategic	Directly relates to 'An enhanced built environment...' (Protecting and Enhancing the	Conforms to RSS policy UR9.	N/A	Effective policy specific to Fylde.	This is a necessary local policy. If this policy is not saved there would be no guidance relevant to ensuring that where such development requires	Remains relevant.	Yes.

Policy Title/Ref	PPS12 Criteria						Other	Save
	(i)	(ii)	(iii)	(iv)	(v)	(vi)		
	policy. Provides for housing in a way that best serves all sections of the community.	Environment).				planning permission it is carried out in an acceptable way. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.		
HL4 : Enlargement and Replacement of rural Dwellings	Is in conformity with central strategy of the FBLP. Seeks to limit development to that appropriate to a rural area.	Directly relates to 'An enhanced built environment...' (Protecting and Enhancing the Environment).	Conforms to RSS policy DP3.	N/A	Supports the objectives of sustainable development.	This is a necessary local policy. If this policy is not saved there would be no guidance relevant to enlargement and replacement of rural dwellings. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Remains relevant.	Yes.
HL5 : House Extensions	Is in conformity with central strategy of the FBLP. Aims to maintain and improve the quality of environment throughout the borough having primary regard to sustainability objectives.	Directly relates to 'An enhanced built environment...' (Protecting and Enhancing the Environment).	Conforms to RSS policy DP3.	N/A	Supports the objectives of sustainable development.	This is a necessary local policy. If this policy is not saved there would be no guidance relevant to house extensions. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Remains relevant.	Yes.
HL6 : Design of	Is in conformity	Directly relates	Conforms to	N/A	Supports the	This is a necessary local	Remains relevant.	Yes.

Policy Title/Ref	PPS12 Criteria						Other	Save
	(i)	(ii)	(iii)	(iv)	(v)	(vi)		
Residential Estates	with central strategy of the FBLP. Aims to maintain and improve the quality of environment throughout the borough having primary regard to sustainability objectives.	to 'An enhanced built environment...' (Protecting and Enhancing the Environment).	RSS policy DP3.		objectives of sustainable development.	policy. If this policy is not saved there would be no guidance relevant to the design of residential estates. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.		
HL7 : Site for Travelling Show People	Is in conformity with central strategy of the FBLP. Provides for accommodation in a way that best serves all sections of the community.	Promotes an enhanced built environment.	N/A. No directly relevant RSS policy.	N/A	N/A	This policy is necessary because it is an essential component of the development plan. It refines the advice in Circular 04/07. If this policy is not saved there would be no guidance relevant to proposals for sites for travelling showpeople. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Remains relevant.	Yes.
HL8 : Sites for Gypsies	Is in conformity with central strategy of the FBLP. Provides for accommodation in a way that best	Promotes an enhanced built environment.	N/A. No directly relevant RSS policy.	N/A	N/A	This policy is necessary because it is an essential component of the development plan. It refines the advice in Circular 01/06. If this policy is not saved there would be no guidance relevant to	Remains relevant.	Yes.

Policy Title/Ref	PPS12 Criteria						Other	Save
	(i)	(ii)	(iii)	(iv)	(v)	(vi)		
	serves all sections of the community.					proposals for sites for gypsies. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.		
CF2 : Provision of new Schools	Is in conformity with central strategy of the FBLP. Facilitates the development of social and community facilities.	Directly relates to 'Sufficient and effective self managed schools ..' (Lifelong Learning).	Conforms to RSS policy UR2.	N/A	N/A	This is a necessary site specific policy. If this policy is not saved there would be no site would be safeguarded for a new primary school. This would significantly weaken the development plan and the ability of the LPA to effectively carry out its development control functions.	Includes unimplemented site allocation.	Yes.

REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING AND DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	5 TH JUNE 2008	6

Interim Housing Policy

Public/Exempt item

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

Summary

To report the responses received as a result of consultation and to make recommended changes to the policy in response to the consultation process.

To seek the Committee's endorsement of the amended policy prior to it being considered by Council.

Recommendation/s

1. That the Committee recommends to Council that the amended draft Interim Housing Policy as shown in Appendix 1 be adopted for purposes including development control.

Executive Portfolio

The item falls within the following executive portfolio[s]:

Development and Regeneration (Councillor Roger Small)

Report

Background

1. It has previously been agreed by Committee that there is a need for the development of an 'Interim Housing Policy', outside the concept of the Local Development Framework. The need stems mainly from two matters: First of all, the fact that a revised draft Regional Spatial Strategy (RSS) is now nearing

completion and contains a much higher dwelling requirement for Fylde Borough (306 dwellings pa compared with 155 dwellings pa in the existing Joint Lancashire Structure Plan (JLSP)). This means that Policy HL1 in the Fylde Borough Local Plan (As Altered) (Oct 2005) will cease to have relevance and some form of replacement policy is needed. Secondly, the preparation of the Core Strategy and the subsequent Site Allocation Policies DPD as identified in the Local Development Scheme (LDS) will not be fully in place until 2012.

2. The Council has already adopted a 'Small Sites Exception' which is currently being used as a basis for some decisions taken by the Development Control Committee. However a more comprehensive policy approach to housing development is required pending the completion of the Core Strategy.
3. In November 2007, following pre-draft consultation, the Committee resolved to recommend that a number of policy options (and other related documents) be agreed for the purposes of consultation. The portfolio holder approved the recommendations on 7th December 2007 and the consultation took place between 10th January and 8th February 2008. Consultation documents were sent to 345 consultees who had requested to be consulted. Adverts were also placed in the local press advertising the policy options availability on the Council's web site and in local libraries.

Consultation Responses

4. The Council received a very high response rate amounting to some 486 responses, all of which were acknowledged by way of a letter. The acknowledgement letter elicited responses from 36 persons who contacted the Council to say that they were not aware of having made any submissions to the IHP consultation.
5. Officers made further inquiries. As a result, it was decided to write to each of the respondents (except those on the Council's register of Consultees) to ask them to confirm that they were aware of the submissions made under their name.
6. 240 respondents have not confirmed their awareness of the submission made under their name. In these circumstances, it is difficult to be confident that each of the submissions in question genuinely represent the views of the person to which they have been attributed. Members will no doubt have regard to these issues in determining how much weight to give to the submissions in question. For convenience, the unconfirmed responses have been recorded separately in Appendices 12 and 13.

Substance of the Responses

7. The main consultation vehicle was a questionnaire which included nine questions. The questions covered the following topics:
 - The principle of having two policies (urban & rural)
 - The Urban Policy Options including Preferred Option E
 - The Rural Policy Options including Preferred Option E
 - The Policy Objectives Appraisal
 - The Draft Summary Appraisal Scoping Report
 - The Sustainability Appraisal of the policy options.

- The draft arrangement for the provision of affordable housing.
- The need or other wise for some low cost market housing.

8. A broad analysis of the responses to the questionnaire on the urban and rural policy options is shown in the two tables below. Responses to the other questions are included in Appendix 2.

Table 1

	Which Urban Option do you support?					
Respondents	A Delivery Option	B Sustainable Option	C Balanced Option	D Do Nothing Option	E Preferred Option	Other
Developers & Associated Professions	0	0	0	0	3 10%	27 90%
Statutory Consultees	0	1 33%	0	0	1 33%	1 33%
Parish Councils	0	1 25%	0	0	1 25%	2 50%
Local Businesses	0	1 5%	0	0	1 5%	19 90%
General Public	0	5 3%	1 1%	2 2%	19 14%	110 80%
Transport Bodies	1 100%	0	0	0	0	0
Other	0	0	1 17%	0	2 33%	3 50%
All Responses	1 1%	8 3%	2 1.5%	2 1.5%	27 13%	162 80%

Table 2

	Which Rural Option do you support?					
Respondents	A Delivery Option	B Sustainable Option	C Balanced Option	D Do Nothing Option	E Preferred Option	Other
Developers & Associated Professions	0	0	0	0	3 11%	25 89%
Statutory Consultees	0	0	0	0	2 67%	1 33%
Parish Councils	0	1 25%	0	0	1 25%	2 50%

Local Businesses	1 5%	0	0	0	8 40%	11 55%
General Public	2 1.2%	5 4%	3 2%	1 0.8%	48 37%	71 55%
Transport Bodies	1 100%	0	0	0	0	0
Other	0	0	0	0	2 50%	2 50%
All Responses	4 2%	6 3%	3 1%	1 1%	64 34%	112 59%

9. A more detailed analysis of respondent's views on the policy options is contained in the schedules included within Appendices 3 - 13 as follows:

Statutory and other consultees: Urban Options: Appendix 3
Statutory and other consultees: Rural Options: Appendix 4
Statutory and other consultees: General Responses: Appendix 5
Development industry and related professions: Urban Options: Appendix 6
Development industry and related professions: Rural Options: Appendix 7
Non-development commercial: Urban Options: Appendix 8
Non-development commercial: Rural Options: Appendix 9
General public: Urban Options: Appendix 10
General public: Rural Options: Appendix 11
Non-validated submissions: Urban Options: Appendix 12
Non-validated submissions: Rural Options: Appendix 13

10. The schedules indicate where submissions have led to a recommendation to change the draft policy. The sum total of all the recommended changes have been incorporated in the amended draft IHP attached as Appendix 1.

Main Changes and Issues

Urban Policy

11. Criterion 1 has been amended to refer only to Lytham St Annes, the urban parts of Blackpool within Fylde, Kirkham/Wesham and Warton. This is consistent with the relative status of the settlements in the Local Plan.
12. Although there were many representations in favour of amending the policy to allow development on greenfield sites outside settlement boundaries (including the Queensway site) criterion 2 has been retained since it would not be legitimate for an informal policy, in effect, to amend a statutory local Plan.
13. A reference to the need for some low cost market housing has been included within criterion 4. There was a very high level of agreement amongst all types

of respondent that some low cost market housing could help address housing needs within the borough.

14. The density criterion is recommended for deletion on the basis that a density policy will now be included in the Regional Spatial Strategy.
15. It is recommended that the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes should be deleted. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations and, as we appear to be moving towards a house building recession, it is considered that now is not the right time to pursue the matter through the planning process.
16. Whilst there was much opposition from the construction industry to the proposed financial contribution towards affordable housing on small housing sites, this has been retained and it is understood that Blackpool and Wyre have indicated that they may well do the same. However, the threshold at which affordable housing would be required on site is recommended to be raised from 9 to 15 dwellings which is the national indicative figure. This is supported by most of the construction industry responses.
17. The target figure of 30% affordable housing has been retained but clarification as to the type of the affordable housing to be provided has been added.
18. A new criterion has been recommended for inclusion which relates to the size, mix, distribution and quality of the affordable housing.
19. A new criterion indicates that the affordable housing should normally be located within the primary application site. This was previously just written in the preamble.
20. An amendment to the relevant criteria now indicates that the Council will negotiate for contributions for public open space and public realm improvements, in the latter case only where there is a declared improvement scheme.

Rural Policy

21. It is recommended that this policy relates to Freckleton, Wrea Green, Staining, Elswick, Newton, Clifton, Little Eccleston, Treales, Wharles, Weeton and Singleton. This is consistent with the relative status of the settlements in the Local Plan.
22. The density criterion is recommended for deletion on the basis that a density policy will now be included in the Regional Spatial Strategy.
23. The policy as drafted now allows for development on greenfield sites where there is a housing land supply of less than 5 years.
24. The affordable housing criteria have been made more explicit and now reflect the policy for the urban area.
25. The exception to this is that the threshold below which contributions will be sought rather than provision on site is recommended to be 3 dwellings or less.

This is to reflect the fact that the size of developments in the villages are likely to be much smaller than in the urban settlements.

26. An amendment to the relevant criteria now indicates that the Council will negotiate for contributions for public open space and public realm improvements, in the latter case only where there is a declared improvement scheme.

Preamble

The main features of the preamble are:

- It outlines the extensive two stage consultation exercise undertaken;
- It indicates that the IHP was listed in the Local Development Scheme;
- It indicates that the document has been subject to sustainability appraisal;
- It sets the context for the IHP and indicates that it must be read in conjunction with other relevant planning documents.
- It provides clearer definitions of affordable and low cost market housing;
- It indicates clear arrangements and principles for the provision of affordable housing;
- It indicates that the Council will negotiate for affordable housing and contributions for other elements of community infrastructure, but where developers seek to negotiate lower contributions, this must be done on an 'open book' basis;
- It prioritises the community infrastructure/ affordable housing contributions;
- It indicates that the same affordable housing and community infrastructure requirements will be placed on developments proposed outside the settlement boundaries, where the Council is minded to grant planning permission.

Implications	
Finance	It is expected that implementation of the policy will derive significant income for the purposes of affordable housing and community infrastructure. Once these details are known a further report on any associated financial implications will be brought to members.
Legal	The weight to be accorded to the IHP will be a matter for the decision maker.
Community Safety	No direct implications
Human Rights and Equalities	No direct implications

Sustainability	The policy has been subject to sustainability appraisal.
Health & Safety and Risk Management	No direct implications

Report Author	Tel	Date	Doc ID
Tony Donnelly	(01253) 658610	May 2008	

List of Background Papers		
Name of document	Date	Where available for inspection
Interim Housing Policy		Local Plans Section Town Hall St Annes

Attached documents

Appendix 1: Amended Draft Interim Housing Policy

Appendix 2: Summary of responses to consultation questionnaire.

Appendix 3: Statutory and other consultees: Responses to Urban Options

Appendix 4: Statutory and other consultees: Responses to Rural Options

Appendix 5: Statutory and other consultees: General Responses

Appendix 6: Development industry and related professions: Responses to Urban Options

Appendix 7: Development industry and related professions: Responses to Rural Options

Appendix 8: Non-development commercial: Responses to Urban Options

Appendix 9: Non-development commercial: Responses to Rural Options

Appendix 10: General public: Responses to Urban Options

Appendix 11: General public: Responses to Rural Options

Appendix 12: Non-validated submissions: Responses to Urban Options

Appendix 13: Non-validated submissions: Responses to Rural Options



Interim Housing Policy

Draft

June 2008

Fylde Interim Housing Policy

Preamble

Background

The need for an Interim Housing Policy stems mainly from the fact that a revised draft Regional Spatial Strategy is now nearing completion and contains a much higher provisional dwelling requirement for the borough (306 dwellings pa compared with 155 dwellings pa in the existing Joint Lancashire Structure Plan (JLSP)). This means that, as the draft Regional Spatial Strategy moves towards formal adoption later in 2008, the current restrictions on the grant of planning permission for housing will be lifted and Policy HL1 in the Fylde Borough Local Plan (As Altered) (Oct 2005) will cease to have central relevance.

The preparation of the Core Strategy and the subsequent Site Allocation Policies Development Plan Document as identified in the Local Development Scheme (LDS) will not be fully in place until 2012. The purpose of the Interim Policy is therefore to inform decisions on planning applications for housing in the period before the completion of the Local Development Framework. It should be noted that the document has been prepared as an informal document since preparation of a development plan document would have taken too long and there is no parent policy in the Local Plan in relation to which a supplementary planning document could have been produced.

The preparation of the Interim Housing Policy is referenced in the Council's adopted Local Development Scheme (March 2007).

Consultation, Appraisal and Adoption

A first round of consultation on the scope of the Interim Housing Policy was undertaken in August / September 2007 and consultation on a number of policy options was undertaken in January / February 2008.

The policy options were subject to two forms of appraisal: First of all, an appraisal to determine how sustainable each option is (Sustainability Appraisal). Secondly, an appraisal to see how effective each option would be in achieving the objectives of the Interim Housing Policy (Policy Objectives Appraisal). These appraisals were themselves subject to the consultation process.

The Interim Housing Policy was adopted by Council on 28th July 2008.

Interim Housing Policy

The IHP consists of two parts relating separately to the borough's urban and rural settlements. The policy is consistent with advice contained within PPS 3: Housing and with the objectives and policies of the emerging Regional Spatial Strategy. The IHP has been prepared to complement the saved policies of the Fylde Borough Local Plan (As Altered) (Oct 2005).

The objectives of the IHP are:

1. To allow sufficient housing to come forward in the interim period to meet the numerical requirements contained in (draft) RSS and to maintain a five year supply of housing land.
2. To maximise the provision of affordable dwellings to be developed in the interim period to meet identified needs.
3. To provide for market and affordable housing of appropriate tenure, size and type to best meet the needs of the community.
4. To provide housing in sustainable locations and which meets the Code for Sustainable Homes.
5. To ensure that infrastructure needed as a result of the development of dwellings is paid for by the developer.
6. To meet the above objectives without undermining the purpose and function of the future Core Strategy.

The IHP must be read together with all other planning policy, including national policy (mainly contained in Planning Policy Statements), the Regional Spatial Strategy and the adopted Fylde Borough Local Plan. It should be noted that the last document contains a policy (Policy HL3) which provides for the development of affordable housing on sites in or adjacent to rural villages where, as an exception to normal planning policies, these would help to address an identified local shortage. No elements of open market housing would be permitted on 'rural exception' sites.

The policy gives direction as to the circumstances in which housing development will be allowed, the location of development and it sets an overall target for the amount of affordable housing to be provided. The policy also specifies the sizes and types of affordable housing needed and the fact that it should be fully integrated into the wider site in terms of its location and design. The intention is that the private sector and affordable housing should be indistinguishable from each other.

Definition of Affordable Housing

The provision of affordable housing by private sector house developers is now a normal and accepted part of the development process and the government is very keen to expand the provision of affordable homes in order to create balanced and inclusive communities. The following definitions explain what is meant by affordable housing, and the difference between 'affordable housing' and 'low-cost market housing'.

Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is rented housing owned and managed by local authorities and registered social landlords (normally housing associations), for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.

Intermediate affordable housing is housing at prices and rents above those of social rent, but below market price or rents and which meet the criteria set out above under 'affordable housing'. It can include shared equity / shared ownership housing and other arrangements where housing is provided at affordable prices by a combination of sale and intermediate rent.

In Fylde Borough, to represent affordable housing, intermediate housing would have to be made available (in terms of monthly outgoings) at prices and rents about half way between those of social rent and those of the open market.

Low cost market housing is housing offered for sale at open market prices, but at a relatively low cost because the homes are generally small and or have a relatively low specification. Examples of low cost market housing include the Redrow 'Debut' and Barratts 'I-Pad' ranges both of which have been built elsewhere in Lancashire. Some of these units sell for under £100,000 and are proving popular with young people wanting to get on the first rung of the 'housing ladder' and others with modest incomes, including divorcing couples.

However, there are limitations to the role that low cost market housing can play in meeting the housing needs of the borough. This is due to their small size and market prices. These homes will only be attractive to a small part of

the market for new homes. Developers need to ensure that design standards (as distinct from internal specifications) remain high and that numbers are limited within any one development to a level where new developments can make a positive, balanced, and enduring contribution to the built environment and community life.

Unless it can meet the above definition for affordable housing low cost market housing **does not fall within the government's definition of affordable housing and is not affordable housing for the purposes of this policy.**

For the purposes of the Interim Housing Policy low cost market housing is defined as *'market housing which will be offered for initial sale at a price that is no more than four times the current median gross residence-based income for the borough of Fylde.* In 2007, this median income was £24,603, making the maximum sales price for a home to be counted as "low cost" to be £98,412.

The Council will update this figure each year.

Arrangements for the Provision of Affordable Housing

On the basis of the evidence of two studies undertaken independently, the Interim Housing Policy is clear that the provision of affordable housing will in the main be by way of social rented dwellings through a Registered Social Landlord (RSL). The dwellings will need to meet the Housing Corporation's scheme development standards and to be rented at price levels that are compatible with the normal target rent levels of Registered Social Landlords.

In order to facilitate the delivery of affordable housing as detailed above, the Council strongly advises developers along with their RSL partners to undertake pre-application discussions with the Council's Housing Services and Planning teams at the earliest possible opportunity. These discussions can be used to discuss any financial impact of affordable housing on the development. They can also be used to discuss the delivery mechanism for the affordable housing .

The Council is in the process of developing a comprehensive affordable housing policy which will complement this Interim Housing Policy.

The arrangements for the provision of affordable housing are based on the following principles:

- to provide the maximum amount of affordable housing on every development of 15 dwellings or more, commensurate with scheme viability, within the targets indicated in the policy;
- to provide the affordable housing on the same site as the private sector housing. In some exceptional circumstances (e.g. within a scheme involving a block of flats) it may not be practical or desirable to include the affordable housing on site. In such circumstances, off-site provision would be allowed providing the full element of affordable

housing is made available normally within the same housing area (defined within the Fylde Housing Needs Survey). E.g. where 100 market dwellings are being provided on the primary site, (at a rate of 30% affordable housing) 43 affordable dwellings (not 30) should be provided on the second site. This is to reflect the fact that 30% of all dwellings (on both sites) should be affordable i.e. 43 is 30% of 143.

- to provide for the most part, social rented housing so as to direct the scarce resources available to those in the most acute housing need.
- to obtain the right size and type of affordable housing;
- to integrate the individual affordable dwellings within the private sector housing layout and design them so that visually both types of housing are indistinguishable so as to help create balanced communities and improve community cohesion and inclusion.
- to avoid payment of financial contributions in lieu of provision of affordable housing unless there is a **very compelling reason** to justify it. Where such exceptional circumstances exist, any financial contribution must be sufficient to enable the provision of the full relevant element of affordable housing, including land, design, construction, marketing and any other relevant development costs. The calculation of financial contributions will be based on the cost of providing the same mix of unit types and sizes and the balance between socially rented and intermediate affordable housing that would otherwise have been required through on-site provision. There will be no financial advantage to the developer in making a financial contribution compared to making provision on site. These costs will be agreed with the Council before planning permission is issued.
- to ensure that developers (in respect of developments of 15 dwellings or more) have a registered social landlord as a nominated partner before the planning application is submitted.
- to encourage developers (including their RSL partners, where appropriate) to undertake pre-application discussions with the Council in respect of all housing developments.

Replacement Affordable Dwellings

Where private sector development proposals include the replacement of a number of existing affordable dwellings, it would normally be the case that the new net provision of affordable dwellings would exclude the number of affordable dwellings to be replaced; i.e. the replacement affordable dwellings would not count towards the developers affordable housing provision under this policy.

An exception to this would be where the affordable housing to be replaced was in such poor condition that it was deemed to be unfit for habitation in which case the replacement would be counted as new provision. ‘

Other Community Infrastructure Requirements

The Interim Housing Policy indicates that the Council will seek certain financial contributions towards community infrastructure, in particular, open space (where this is not being provided on site) public realm works (where there are identified schemes in the area) and affordable housing (on sites below 15 dwellings). The size of the contributions being sought are considered to be very low, such that the Council expects that these will be paid in full in most circumstances. However it is not the objective of the Council to make otherwise acceptable schemes unviable. In all circumstances where developers seek to negotiate terms below those indicated in the IHP on the basis that they would make a scheme uneconomic, the Council will require an ‘open book’ approach to the negotiations. This will involve the developer providing verifiable evidence of all actual and anticipated costs and incomes, including land costs, all development related costs, sales revenues and profit margins.

Where a particular development may not be able to provide all the indicated contributions towards community infrastructure, the following priorities are indicated:

1. affordable housing;
2. public open space;
3. town centre/public realm improvements.’

Developers should also be aware that on some housing schemes, additional to the requirements for community infrastructure referred to in this policy, Lancashire County Council may also seek developer contributions in respect of necessary County related infrastructure such as transport and highway improvements.

Development Outside Settlement Boundaries.

Whilst the provisions and principles of this policy have been prepared to relate to proposed housing developments located within settlement boundaries, the elements relating to the provision of affordable housing, to making financial contributions for this and other forms of community infrastructure will also be applied to proposed housing developments submitted on sites outside settlement boundaries where the Council is mindful to grant planning permission. Developers should note that other contributions towards community infrastructure may be requested in respect of such proposed developments.

Contact Details

Persons wishing to obtain further information in respect of this policy document should contact:

Interim Housing Policy (Re-drafted for PPSC 5th June 2008)

Urban Option

Planning permission for residential development will be granted subject to all the following criteria:

1. The application site is within the settlement boundaries of Lytham St Annes, the urban parts of Blackpool at Squires Gate Lane and Normoss, Kirkham/Wesham, and Warton as defined in the Fylde Borough Local Plan (As Altered) (Oct 2005);
2. The application site is not designated for other purposes or protected by policies in the Fylde Borough Local Plan (As Altered) (Oct 2005);
3. In respect of greenfield sites, the applicant is able to show that there is a need for the development of the site (i.e. that there is less than a 5 year supply of land within the borough as a whole and that the application under consideration would not increase the supply beyond 7 years);
4. The development of the site would not significantly harm the character of the settlement or any other planning interest;
5. In respect of proposals involving 10 dwellings or more, where appropriate, the mix of housing types, sizes and tenures reflects local housing requirements, and is consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment. The Council will encourage the provision of low cost market housing as part of the normal mix of market housing.
6. In respect of proposals involving 14 or less dwellings a financial contribution of 5% of the open market value of each dwelling is made towards the facilitation of affordable housing within the borough. Financial contributions will not be sought in respect of affordable dwellings as defined in PPS3 and conversions to dwellings of spaces above existing premises in defined town centres; *
7. In respect of proposals of 15 or more dwellings, the Council will require 30% of the dwellings to be affordable unless the developer can demonstrate by means of verifiable evidence that the development would not be viable with that percentage. Normally, all the affordable units should be provided as socially rented homes through a named Registered Social Landlord (RSL);

8. Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:
 - in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes such that this would not represent the priority for provision.
 - The development proposal is for 100% affordable housing and is either submitted by a Registered Social Landlord or has financial support by the Housing Corporation.
9. The size of affordable units should reflect local requirements and should proportionately reflect the mix of dwelling sizes of the whole development. The affordable units should meet the Housing Corporation's 'Design and Quality Standards'. Dwellings provided as affordable housing should not be separated on one part of the development site, but should be mixed in with the dwellings for open market sale. The elevational treatments of the affordable units should be indistinguishable from the homes for open market sale.
10. In all but exceptional cases, the requirement for affordable housing provision should be met on the site of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a financial payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy.
11. In respect of proposals located within settlements in which there are declared town centre or other public realm improvement schemes, the Council will negotiate for a financial contribution of 2.5% of the open market value of each market dwelling towards those schemes;*
12. In respect of proposals where under the terms of Policy TREC 17 of the Fylde Borough Local Plan (As Altered) (Oct 2005) no provision (or inadequate Provision) of open space is made on the site, or the requirement for open space on the site would be less than 0.2 ha, the Council will negotiate for a financial contribution of 2.5% of the open market value of each dwelling is made in lieu of on site provision; *

- * **80% of the required financial contribution(s) shall be paid to the Council prior to commencement of the development. Within 56 days of the initial occupation of the property, the remaining instalment shall be paid to the Council, or a refund made if the sale price is less than the first sum paid. Where there is a dispute in relation to the open market value, or the property is not sold on the open market, the contribution will be based on a valuation by the Valuation Office (to be paid for by the developer).**

Rural Option

Planning permission for residential development will be granted subject to all the following criteria:

1. The application site is within the settlement boundaries of one of the following settlements as defined in the Fylde Borough Local Plan (As Altered) (Oct 2005): Freckleton, Wrea Green, Staining, Elswick, Newton and Clifton Little Eccleston, Treales, Wharles, Weeton, and Singleton;
2. The application site is not designated for other purposes or protected by policies in the Fylde Borough Local Plan (As Altered) (Oct 2005);
3. In respect of greenfield sites, the applicant is able to show that there is a need for the development of the site (i.e. that there is less than a 5 year supply of land within the borough as a whole);
4. The development of the site would not significantly harm the character of the settlement or other planning interests;
5. The mix of housing types, sizes and tenures proposed reflects local housing requirements, and is consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment;
6. In respect of proposals involving 3 or less dwellings a financial contribution of 5% of the open market value of each dwelling is made towards the facilitation of affordable housing within the borough. Financial contributions will not be sought in respect of affordable dwellings as defined in PPS3; *
7. In respect of proposals of 4 or more dwellings, the Council will require 30% of the dwellings to be affordable unless the developer can demonstrate by means of verifiable evidence that the development would not be viable with that percentage;

8. All affordable dwellings should be delivered through Registered Social Landlords or local trusts with approved agreements in place to ensure that homes are available as affordable housing in perpetuity, subject to the ability of shared ownership leaseholders to “staircase”;
9. Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:
 - in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes such that this would not represent the priority for provision;
 - the development proposal is for 100% affordable housing and is either submitted by a Registered Social Landlord or has financial support by the Housing Corporation;
 - an up-to-date local housing needs survey demonstrates a particular need for intermediate affordable housing.
10. The size of affordable units in development proposals should reflect local requirements and should proportionately reflect the mix of dwelling sizes of the whole development. The affordable units should meet the Housing Corporation's 'Design and Quality Standards'. Homes provided as affordable housing should not be separated on one part of the development site, but should be mixed in with the homes for open market sale. The elevational treatments of the affordable units should be indistinguishable from the homes for open market sale.
11. In all but exceptional cases, the requirement for affordable housing provision should be met on the site of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a financial payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy;
12. In respect of all proposals, located within settlements in which there are declared town centre or other public realm improvement schemes, a financial contribution of 2.5% of the open market value of each market dwelling is made towards those schemes; *
13. In respect of all proposals where under the terms of Policy TREC 17 of the Fylde Borough Local Plan (As Altered) (Oct 2005) no provision (or

inadequate provision) of open space is made on the site, or the requirement for open space on the site would be less than 0.2 ha, a financial contribution of 2.5% of the open market value of each dwelling is made in lieu of on site provision; *

- * **80% of the required financial contribution(s) shall be paid to the Council prior to commencement of the development. Within 56 days of the initial occupation of the property, the remaining instalment shall be paid to the Council, or a refund made if the sale price is less than the first sum paid. Where there is a dispute in relation to the open market value, or the property is not sold on the open market, the contribution will be based on a valuation by the Valuation Office (to be paid for by the developer).**

Table 3

	Do you agree that it is appropriate in principle to have separate policies, one for the larger settlements and one for the smaller rural villages?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	30 100%	0	0
Statutory Consultees	2 100%	0	0
Parish Councils	5 100%	0	0
Local Businesses	22 100%	0	0
General Public	132 97%	(3) 2%	1
Transport Bodies	1 100%	0	0
Other	7 100%	0	0
All Responses	199 98%	(3) 1%	1

Table 4

	Do you think the 'Policy Objectives Appraisal' is a fair and useful tool in assessing the policy options?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	13 43%	3 1%	14 46%
Statutory Consultees	2 67%	0	1 33%
Parish Councils	3 60%	1 20%	1 20%
Local Businesses	6 27%	14 63%	2 10%
General Public	39 28%	58 42%	39 28%
Transport Bodies	1 100%	0	0
Other	3 60%	1 20%	1 20%
All Responses	67 33%	77 38%	58 29%

Table 5

	Do you think that the Draft Summary Sustainability Appraisal Scoping Report is sound?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	5 17%	2 7%	23 76%
Statutory Consultees	1 33%	2 67%	0
Parish Councils	2 40%	2 40%	1 20%
Local Businesses	1 4%	12 55%	9 41%
General Public	14 10%	59 44%	62 46%
Transport Bodies	1 100%	0	0
Other	3 75%	0	1 25%
All Responses	27 13%	77 39%	96 48%

Table 6

	Do you think the 'Sustainability Appraisal' of the policy options is sound?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	5 17%	2 7%	23 76%
Statutory Consultees	1 33%	1 33%	1 33%
Parish Councils	2 40%	2 40%	1 20%
Local Businesses	3 14%	10 43%	10 43%
General Public	22 16%	51 38%	61 46%
Transport Bodies	1 100%	0	0
Other	3 60%	1 20%	1 20%
All Responses	37 18%	67 33%	97 48%

Table 7

	Are the suggested arrangements for the provision of affordable housing appropriate as shown in the consultation document?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	3 10%	26 87%	1 3%
Statutory Consultees	1 33%	1 33%	1 33%
Parish Councils	2 40%	2 40%	1 20%
Local Businesses	9 43%	7 33%	5 24%
General Public	57 42%	58 43%	20 15%
Transport Bodies	1 100%	0	0
Other	2 40%	3 60%	0
All Responses	75 37.5%	97 48.5%	28 14%

Table 8

	Do you think that the provision of some low cost market housing (as distinct from affordable housing) would improve housing choice and make a useful contribution to meeting housing needs in the borough?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	29 97%	0	1 3%
Statutory Consultees	1 33%	0	2 67%
Parish Councils	5 100%	0	0
Local Businesses	18 82%	2 9%	2 9%
General Public	116 87%	3 2%	15 11%
Transport Bodies	1 100%	0	0
Other	5 100%	0	0
All Responses	175 88%	5 2%	20 10%

Table 9

	Do you think that the financial definition of 'low cost market housing' is appropriate (i.e. an affordability factor of 3.3 calculated as 90% of the sale price of the dwelling divided by the up-to-date median gross household income in the borough)?		
Respondents	Yes	No	Don't know
Developers & Associated Professions	5 17%	14 47%	11 36%
Statutory Consultees	1 33%	0	2 67%
Parish Councils	0	4 80%	1 20%
Local Businesses	5 23%	6 27%	11 50%
General Public	27 20%	37 28%	69 52%
Transport Bodies	0	1 100%	0
Other	2 50%	1 25%	1 25%
All Responses	40 20%	63 32%	95 48%

Statutory and Other Consultees: Urban Options

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
GONW	In respect of Criterion 3a greenfield sites can be refused permission if they harm other planning interests, including sustainability or if previously developed sites are available.	Agreed.	Amend 3b to read: 'The development of the site would not significantly harm the character of the settlement or other planning interests '.
	In respect of Criterion 10, planning obligations must be related to the proposed development such that it is questionable that a financial contribution towards town centre and public realm improvements can be justified in respect of <u>all</u> proposals.	Agreed.	Amend 10 to read: ' In respect of those proposals located within settlements in which there are declared town centre or other public realm improvement schemes, a financial contribution of 2.5% of the open market value of each dwelling is made towards those schemes. '
Blackpool BC	Support restricting	Noted	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	development to within the urban boundary.		
	Support proposed financial developer contributions.	Noted	No change
	Support requirement to meet Code Level 3 in the Code for Sustainable Homes.	Support noted, but it is recommended elsewhere to delete the reference to the Code for Sustainable Homes.	No change.
	Support 5% affordable contribution on small sites.	Noted	No change
	A clear definition of how off site affordable housing contributions will be calculated is needed.	Agreed	Amend by inserting the following into the preamble: 'Where such exceptional circumstances exist, any financial contribution will be sufficient to enable the provision of the full relevant element of affordable housing, including land, design, construction, marketing and any other relevant development costs. The calculation of financial contributions will be based on the cost of providing the same mix of unit types and sizes and the balance between socially rented and intermediate affordable housing that would otherwise have been required through on-site provision. There will be no financial advantage to the developer in making a financial contribution compared to making provision on site. These costs will be agreed with the

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			Council before planning permission is issued.'
	It is unclear how the requirement for 30% affordable housing contribution relates to the findings of the Fylde SHMA which appears to indicate a higher level of need.	The requirement of 30% affordable housing was selected having regard to the need not to unduly prejudice the supply of new dwellings by private sector housing developers.	No change.
	The policy should distinguish between need for social rented and intermediate housing.	Agreed. Both the Fordham HNS update and the DTZ Strategic Housing Market Assessment indicate that the overriding need is for social rented housing with a small element of intermediate housing.	<p>Amend the policy by incorporating the following criteria:</p> <p>'Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:</p> <ul style="list-style-type: none"> • in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes such that this would not represent the priority for provision.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<ul style="list-style-type: none"> The development proposal is for 100% affordable housing and is either submitted by a Registered Social Landlord or has financial support by the Housing Corporation.'
	In criterion 4, the 100 dwelling threshold should be lowered and 'mixed development scheme' should be defined.	This criterion should be omitted as it is partly duplicated by criterion 6 and the general advice in PPS 3: Housing.	Amend Option 3 by deleting criterion 4.
Lancashire County Council			
	The Interim Housing Policy should reflect the policy differentiation in draft RSS between Key Service Centres and other settlements. Urban Option B does this.	The Proposed Changes to the draft RSS no longer define Key Service Centres. There is thus no substance to this submission.	No change
	Option B Criterion 3 should be modified to reflect the sequential approach to site	The concept of having a sequential approach to development is more appropriate for a process of	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	selection in accordance with draft RSS policy DP1.	land allocation. It is difficult to achieve this in a development control policy which has to indicate whether or not a particular proposal would be permitted for development.	
	Option B Criterion 3 is a more exacting target than Draft RSS Policy EM16 as recommended to be amended.	Noted.	No change
North West Regional Development Agency	Generally support Option E (preferred option)	Support noted.	No change
North West Regional Assembly	The Interim Housing Policy should reflect the policy differentiation in draft RSS between Key Service Centres and other settlements.	The Proposed Changes to the draft RSS no longer define Key Service Centres. There is thus no substance to this submission.	No change
	Option E includes references to the smaller (non-key service	Since the IHP only permits housing within the settlement boundaries, the	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	centre) settlements. The Local Plan identifies differing levels of development for different size of settlement. The IHP should not undermine this approach.	potential issue of large scale development being undertaken in small-scale settlements will not arise.	
	Criterion 3 of Option A should incorporate a reference to the need to give priority to previously developed land pdl.	Option A was included as the 'delivery' option which sought to maximise housing development by having minimal restrictions. Giving priority to pdl is a feature of Option B the 'sustainable' option.	No change
	The Panel's recommendation on draft RSS on density is that there should be a minimum density of 30 dwellings per hectare, with 40 dwellings per hectare in urban areas and higher densities in locations within walking distance of good public transport services.	Agreed. If RSS is to have a specific detailed policy on housing density, then the IHP does not have to repeat this policy. Applications will be determined having regard to the RSS density policy.	Amend the policy by omitting criterion 5.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	Support the requirement to provide a mix of housing types and sizes but should make reference to tenures and prices.	Support noted. The reference to tenure is appropriate but planning cannot control house prices. Prices would normally be a function of size in any event.	Amend Option E by inserting the following amended criteria: 'In respect of proposals involving 10 dwellings or more, where appropriate, the mix of housing types, sizes and tenures reflects local housing requirements, and is consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment. The Council will encourage the provision of low cost market housing as part of the normal mix of market housing.'
	Support the proposal to implement the Code for Sustainable Homes.	Support noted. However, the current recommendation is to delete the reference to the Code for Sustainable Homes.	No change
	Support for the requirement to provide 30% affordable units on sites of 10 or more dwellings.	Support noted.	No change
	The policy should be clearer that the affordable housing provision should be on	Agreed.	Amend Option E by inserting the following amended criteria: 'In all but exceptional cases, the requirement for affordable housing provision should be met on the site

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	site.		of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a financial payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy.'
United Utilities	Supports Option E (preferred option)	Support noted.	No change
FBC Housing Section			
	With reference to Option E, in criterion 4, all schemes should contribute towards sustainable communities not just schemes of more than 100 units.	This is agreed. In response to a representation from Blackpool Council, it is recommended that criterion 4 is deleted.	No change.
	With reference to Option E, in criterion 4, mixed development schemes should be defined.	See above.	No change.
	With reference to Option E, in criterion 5, the reference to density	If RSS is to have a specific detailed policy on housing density, then the IHP does	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	is too vague. Other relevant policies relating to density should be stated here.	not have to repeat this policy. Applications will be determined having regard to the RSS density policy. In response to a representation from Blackpool Council, it is recommended that criterion 5 is deleted.	
	With reference to Option E, in criterion 6 the reference to the 'Fylde Coast Strategic Housing Market Assessment' should be worded to allow for an interpretation to enable an allowance for local requirements	Agreed.	Amend criterion 6 to read: 'In respect of proposals involving 10 dwellings or more, where appropriate, the mix of housing types, sizes and tenures reflects local housing requirements , and is consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment. The Council will encourage the provision of low cost market housing as part of the normal mix of market housing.'
	With reference to Option E, criteria 8 & 9, a definition of 'affordable' housing	A definition of affordable housing is provided in the introduction to the policy. It is agreed that this could be	Amend the introduction to read: Affordable housing includes social rented and intermediate housing, provided to specified eligible

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	should be provided with particular reference to PPS 3: Housing.	given more prominence.	<p>households whose needs are not met by the market. Affordable housing should:</p> <ul style="list-style-type: none"> • Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. • Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision. <p>Social rented housing is rented housing owned and managed by local authorities and registered social landlords (normally housing associations), for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.</p> <p>Intermediate affordable housing is housing at prices and rents above those of social rent, but below market price or rents and which meet the criteria set out above under 'affordable housing'. It can include shared equity / shared ownership housing and other arrangements where housing is provided at affordable</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<p>prices by a combination of sale and intermediate rent.</p> <p>In Fylde Borough, to represent affordable housing, intermediate housing would have to be made available (in terms of monthly outgoings) at prices and rents about half way between those of social rent and those of the open market.</p> <p>Low cost market housing is housing offered for sale at open market prices, but at a relatively low cost because the homes are generally small and or have a relatively low specification. Examples of low cost market housing include the Redrow 'Debut' and Barratts 'I-Pad' ranges both of which have been built elsewhere in Lancashire. Some of these units sell for under £100,000 and are proving popular with young people wanting to get on the first rung of the 'housing ladder' and others with modest incomes, including divorcing couples.</p> <p>However, there are limitations to the role that low cost market housing can play in meeting the housing needs of the borough. This is due to their small size and market prices. These homes will only be attractive to a small part of the market for new homes. Developers need to ensure that design standards (as distinct from internal specifications) remain high and that numbers are limited within any one development to a level where new developments can make a positive,</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<p>balanced, and enduring contribution to the built environment and community life.</p> <p>Unless it can meet the above definition for affordable housing low cost market housing does not fall within the government's definition of affordable housing and is not affordable housing for the purposes of this policy.</p> <p>For the purposes of the Interim Housing Policy low cost market housing is defined as '<i>market housing which will be offered for initial sale at a price that is no more than four times the current median gross residence-based income for the borough of Fylde</i>'. In 2007, this median income was £24,603, making the maximum sales price for a home to be counted as "low cost" to be £98,412.</p> <p>The Council will update this figure each year.</p>
	<p>The level of affordable housing to be negotiated from a particular development must have regard to the Council's competing aspirations for other forms of planning gain. The Council should</p>	Agreed.	<p>Insert into the preamble to the policy the following:</p> <p>'The Council prioritises the contributions in the following order: Firstly, affordable housing; secondly, public open space; thirdly town centre/public realm improvements.'</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	indicate what its priorities are in this respect.		
	<p>With reference to Option E, criteria 8 & 9, the requirement for 30% affordable housing is too low. It should be increased to 40% which is a realistic level based on previous experience.</p> <p>It should be remembered that the provision of more affordable housing is the Council's number one priority in its adopted 'Housing Strategy'.</p> <p>Setting the requirement at a higher level but allowing for negotiation where there are viability problems is likely to produce more affordable housing than lowering the</p>	<p>Members consider that the existing target figure of 30% is reasonable.</p> <p>However, where developers seek to negotiate a lower proportion of affordable housing than the target figure, this must be done by reference to verifiable evidence.</p>	<p>Amend option E by inserting the following amended criteria:</p> <p>'In respect of proposals of 15 or more dwellings, the Council will require 30% of the dwellings to be affordable unless the developer can demonstrate by means of verifiable evidence that the development would not be viable with that percentage. Normally, all the affordable units should be provided as socially rented homes through a named Registered Social Landlord (RSL); '</p> <p>'Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:</p> <ul style="list-style-type: none"> • in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	<p>requirement for all developments because it is not viable on some of them.</p> <p>The policy must be explicit in respect of the proportions of affordable housing required in terms of social rented and intermediate. The two types of affordable housing meet very different needs.</p>		<p>such that this would not represent the priority for provision.</p> <ul style="list-style-type: none"> • The development proposal is for 100% affordable housing and is either submitted by a Registered Social Landlord or has financial support by the Housing Corporation.'
	<p>The policy is silent on the issue of replacement affordable housing within new-build proposals.</p>	<p>It is agreed that the policy could refer to such circumstances albeit that these are likely to be rare.</p>	<p>The preamble to the policy be amended by the incorporation of the following:</p> <p>' Where private sector development proposals include the replacement of a number of existing affordable dwellings, it would normally be the case that the new net provision of affordable dwellings would exclude the number of affordable dwellings to be replaced; i.e. the replacement affordable dwellings would not count towards the developers affordable housing provision under this policy.</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			An exception to this would be where the affordable housing to be replaced was in such poor condition that it was deemed to be unfit for habitation in which case the replacement would be counted as new provision. ‘
	The policy is silent on the provision of off-site affordable housing and commuted sums payments for developments over 10 units although this is covered in the general preamble.	It is agreed that this issue could be referred to within the policy itself.	Amend Option E by inserting the following new criterion: ‘In all but exceptional cases, the requirement for affordable housing provision should be met on the site of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a commuted sum payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy.’
	References in the policy should be to the Fylde Coast Strategic Housing Market Assessment and not to the Council's ‘latest housing needs survey’.	Reference to both documents is warranted since these were independently prepared and closely endorse each others findings on the issue of affordable housing	No change.
	It should be explicit in the policy that RSLs	This matter is more appropriately referred to in	Amend the preamble by inserting the following:

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	should be involved in pre-application discussions	the preamble.	'In order to facilitate the delivery of affordable housing as detailed above, the Council strongly advises developers along with their RSL partners to undertake pre-application discussions with the Council's Housing Services and Planning teams at the earliest possible opportunity. These discussions can be used to discuss any financial impact of affordable housing on the development. They can also be used to discuss the delivery mechanism for the affordable housing . The Council is in the process of developing a comprehensive affordable housing policy which will complement this Interim Housing Policy. '
	The policy should refer to specific target rents with regard to socially rented housing to reduce the possibility of bidding between RSLs for development opportunities at the expense of rents paid by tenants.	This issue is dealt with in the amended preamble to the policy. This issue will also be considered within the Council's Affordable Housing Policy which is programmed for preparation later in the year. A reference to this document should be made within the preamble.	No change.
	The policy should be explicit that the homes offered by developers	Agreed	Amend the policy be the insertion of a new criterion as follows:

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	as affordable housing must meet the Housing Corporation's Design and Quality standards.		The affordable units should meet the Housing Corporation's Design and Quality Standards. Homes provided as affordable housing should not be separated on one part of the development site, but should be mixed in with the homes for open market sale. The elevational treatments of the affordable units should be indistinguishable from the homes for open market sale.
CPRE	Supports sustainable Option B subject to the town's category including only Lytham St Annes, Kirkham/Wesham, Squires Gate and Normoss.	The sustainable option would be most unlikely to deliver the required amount of new housing.	No change
	The 2.5% contributions to town centre improvements and open space should not be levied on affordable housing.	It is agreed that the priority should be not to increase the costs of developing affordable housing. It is agreed that the town centre/public realm improvement contribution should not be required. The provision of open space is a normal part of any housing development.	Amend the criterion to read: A financial contribution of 2.5% of the open market value of each market dwelling is made towards town centre and public realm improvements;

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	No 5% contribution towards affordable housing should be levied on low cost market housing.	Whilst, this is stated in criterion 8 of Option E, on reflection, there is no reasonable argument in favour of excepting low cost market housing from the need to make a contribution to affordable housing. Low cost market housing is just one type of market housing.	Amend criterion 8 to omit the reference to 'low cost market housing'.
	On sites involving more than 100 dwellings, a target of (say) 10% low cost market housing should be required.	Criterion 6 already makes reference to the need to provide a mix of housing types sizes and tenures.	No change
Elswick PC	Elswick should not be classified as 'urban'. It should be included in Rural Option E.	Agreed.	Amend criterion 1 to read: 'The application site is within the settlement boundaries of Lytham St Annes, the urban parts of Blackpool at Squires Gate Lane and Normoss, Kirkham/Wesham and Warton as defined in the Fylde Borough Local Plan (As Altered) (Oct 2005);
	With regard to criterion 9 of Option B, Elswick is not within 30 minutes public transport time of	Option B would be unlikely to deliver the number of dwellings needed to meet the RSS housing	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	any significant area of employment, any major retail centre of any of the main secondary schools used by the children of the village. Every new house would require the use of two cars therefore it is highly unlikely that people requiring affordable housing would be able to afford to live in the village.	requirement. Affordable housing may be needed in the village to provide for people already working in the village.	
Bryning with Warton PC	As a general point some additional development would help the village to retain its services: shops , schools, post office.	Comment noted.	No change.
	There is very little previously developed land currently available in the village. Some limited development should be allowed on greenfield sites.	Urban Option E makes provision for some development on green field sites albeit within the existing settlement boundaries.	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	The policy should alert prospective developers to the fact that the County Council may also seek developer contributions on some housing schemes.	Agreed.	Insert the following paragraph into the preamble: 'Developers should be aware that on some housing schemes, additional to the requirements for community infrastructure referred to in this policy, Lancashire County Council may also seek developer contributions in respect of necessary County related infrastructure such as transport and highway improvements.'
	Supports the mixing of affordable housing with market housing to avoid the old style council house ghettos.	Support noted.	No change.
Treales, Roseacre & Wharles PC	Would favour Urban Option B subject to changing the threshold figure of ten dwellings in criterion 11(which triggers the provision of affordable housing on site, to four dwellings.	It is considered that such a low threshold would be difficult to justify given the government's indicative threshold of 15.	No change.
	Would favour Urban Option B subject to a change to criterion 10 which reduced the threshold of nine dwellings (in relation to	This suggestion reflects the suggested lowering of the threshold above to four dwellings.	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	the payment of a 5% contribution towards affordable housing) to three dwellings.		
Ribby with Wrea Parish Council	Supports Option E	Support noted	No change
St Annes on Sea Town Council	Supports Option B (sustainable option)	Position noted	No change
Staining Parish Council	Supports Option B	Position noted	No change
Little Eccleston & Larbreck Parish Council	In principle suggest that there should be a single coherent policy for the borough but of the options presented prefer option B (sustainable option).	Position noted	No change
Defend Lytham	Supports Option C (The Balanced Option)	Position noted.	No change
Federation of Lancashire Civic Societies	Supports Option E	Support noted	No change
St Annes	Supports Option B	Position noted	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Chamber of Trade	(Sustainable Option)		
Jehovah's Witnesses	No formal view on the options but would ask the Council to make provision for community facilities within new housing developments, including churches.	This is more a matter for the Core Strategy than for the IHP since all sites will be within the existing settlement boundaries.	No change.
Crowd	There is already a five year supply of building land.	The government has changed the way in which the five year housing requirement must be calculated. There is not currently a five year supply of housing land.	No change
Crowd	Urban/Rural policies should reflect the settlement hierarchies set out in JLSP and draft RSS. Most development should be in Lytham St Annes and Kirkham/Wesham.	The Proposed Changes to the draft RSS no longer define Key Service Centres and the JLSP is soon to be abandoned. There is thus no substance to this submission.	No change
Crowd	Supports Option B (Sustainable Option) subject to maintaining a five year supply in	The sustainable option would be most unlikely to deliver the required amount of new housing.	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	criterion 5.		
Crowd	Supports option B (Sustainable Option) subject to changes to the range of facilities indicated in criterion 9. Required changes not stated in submission.	The sustainable option would be most unlikely to deliver the required amount of new housing.	No change
Crowd	Supports option B (Sustainable Option) subject to the 2.5% being waived for affordable homes.	The sustainable option would be most unlikely to deliver the required amount of new housing.	No change
Crowd	Strongly dispute the stated need for affordable homes.	Crowd's view is contradicted by two independent up-to-date consultant's studies which both show a very high need for affordable housing.	No change
Crowd	Object to lowering of affordable homes requirement from 60%.	The 60% figure was set high in the circumstances of the housing 'moratorium'. The IHP is being prepared to respond to the emerging RSS which has a much higher housing requirement.	No change
Crowd	References to 'low cost market housing' are confusing.	This is accepted. The definition of low cost market housing in the preamble is	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
		recommended to be simplified.	
St Thomas C of E Parish Church, St Annes	Support Option E	Support noted.	No change.

Statutory and Other Consultees: Rural Options

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
GONW	In respect of Criterion 6, planning obligations must be related to the proposed development such that it is questionable that a financial contribution towards town centre and public realm improvements can be justified in respect of <u>all</u> proposals.	Accepted.	Amend the policy criterion to read: 'In respect of all proposals, located within settlements in which there are declared town centre or other public realm improvement schemes, a financial contribution of 2.5% of the open market value of each market dwelling is made towards those schemes;'
North West Regional Assembly	The Interim Housing Policy should reflect the policy differentiation in draft RSS between Key Service Centres and other settlements.	The Proposed Changes to the draft RSS no longer define Key Service Centres. There is thus no substance to this submission.	No change
	The Panel's recommendation on draft RSS on density	Agreed. If RSS is to have a specific detailed policy on housing density, then the IHP does not have	Amend the policy by deleting criterion 3.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	is that there should be a minimum density of 30 dwellings per hectare, with 40 dwellings per hectare in urban areas and higher densities in locations within walking distance of good public transport services.	to repeat this policy. Planning applications will be determined having regard to the RSS policy.	
	Support the proposal to implement the Code for Sustainable Homes.	Support noted.	No change
	Support the requirement to provide a mix of housing types and sizes but should make reference to tenures and prices.	Support noted. The reference to tenure is appropriate but planning cannot control house prices. Prices would normally be a function of size in any event.	Amend the policy criterion to read: 'The mix of housing types, sizes and tenures proposed reflects local housing requirements, and is consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment;'
	It is not clear what the approach to affordable housing is in criteria 5.	It is agreed that a clearer explanation of requirements should be incorporated in the policy.	'In respect of proposals involving 3 or less dwellings a financial contribution of 5% of the open market value of each dwelling is made towards the facilitation of affordable housing within the borough. Financial

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<p>contributions will not be sought in respect of affordable dwellings as defined in PPS3; *</p> <p>In respect of proposals of 4 or more dwellings, the Council will require 30% of the dwellings to be affordable unless the developer can demonstrate by means of verifiable evidence that the development would not be viable with that percentage;</p> <p>All affordable dwellings should be delivered through Registered Social Landlords or local trusts with approved agreements in place to ensure that homes are available as affordable housing in perpetuity, subject to the ability of shared ownership leaseholders to "staircase";</p> <p>Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:</p> <ul style="list-style-type: none"> • in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes such

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<p>that this would not represent the priority for provision;</p> <ul style="list-style-type: none"> the development proposal is for 100% affordable housing and is either submitted by a Registered Social Landlord or has financial support by the Housing Corporation; an up-to-date local housing needs survey demonstrates a particular need for intermediate affordable housing. <p>The size of affordable units in development proposals should reflect local requirements and should proportionately reflect the mix of dwelling sizes of the whole development. The affordable units should meet the Housing Corporation's 'Design and Quality Standards'. Homes provided as affordable housing should not be separated on one part of the development site, but should be mixed in with the homes for open market sale. The elevational treatments of the affordable units should be indistinguishable from the homes for open market sale.</p> <p>In all but exceptional cases, the requirement for affordable housing provision should be met on the</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			site of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a financial payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy;'
United Utilities	Supports Option E (preferred option)	Support noted.	No change.
FBC Housing Section	It is understood that any proposal for housing outside the village boundaries would fall within the rural exceptions policy.	<p>This is right and could be made clear in the preamble.</p> <p>The submission also triggers a broader point about how the Council would deal with planning applications submitted outside the settlement boundaries (urban and rural) in terms of negotiating for affordable housing, contributions to public open space and public realm improvements.</p>	<p>Amend the policy by inserting the a new sections into the preamble as follows:</p> <p>'Whilst the provisions and principles of this policy have been prepared to relate to proposed housing developments located within settlement boundaries, the elements relating to the provision of affordable housing, to making financial contributions for this and other forms of community infrastructure will also be applied to proposed housing developments submitted on sites outside settlement boundaries where the Council is mindful to grant planning permission.'</p> <p>It should be noted that the last document contains a policy (Policy HL3) which provides for the development of affordable housing on sites in or adjacent to rural villages where, as an exception to normal planning policies, these would help to address an identified local</p>

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			shortage. No elements of open market housing would be permitted on 'rural exception' sites.
	With reference to Option E, in criterion 3, the reference to density is too vague. Other relevant policies relating to density should be stated here.	Agreed. If RSS is to have a specific detailed policy on housing density, then the IHP does not have to repeat this policy. Applications will be determined having regard to the RSS density policy.	Amend the policy by deleting criterion 3.
	With reference to Option E criterion 4, the policy is too restrictive and should allow development on greenfield sites where there are no previously developed sites available.	Agreed.	Amend the policy by amending criterion 4 to read: 'In respect of greenfield sites, the applicant is able to show that there is a need for the development of the site (i.e. that there is less than a 5 year supply of land within the borough as a whole);'
Elswick Parish Council	Supports Option E subject to Elswick being made subject to it.	Agreed.	Amend the first criterion to read: 'The application site is within the settlement boundaries of one of the following settlements as defined in the

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			Fylde Borough Local Plan (As Altered) (Oct 2005): Freckleton, Wrea Green, Staining, Elswick, Newton and Clifton Little Eccleston, Treales, Wharles, Weeton, and Singleton; ‘
Staining Parish Council	Supports Option E (preferred option).	Support noted	No change
Ribby with Wrea Parish Council	Supports Option E (preferred option).	Support noted	No change
Treales Roseacre and Wharles Parish Council	Supports Option B (sustainable option) subject to a new policy which excludes new-build development in areas not identified in either the urban or rural options.	<p>The sustainable option would be unlikely to provide the dwellings needed to meet the RSS housing requirement.</p> <p>The policies of the Local Plan continue to apply such that there is a policy presumption against development outside settlement boundaries.</p>	No change
Little Eccleston with Larbreck Parish Council	Supports Option B (sustainable option)	The sustainable option would be unlikely to provide the dwellings needed to meet the RSS housing requirement. Position noted	No change
CPRE	Supports sustainable	The sustainable option would be	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	Option B subject to all settlements other than Lytham St Annes, Kirkham/Wesham, Squires Gate and Normoss falling within the 'village' category.	unlikely to provide the dwellings needed to meet the RSS housing requirement Position Noted	
	Housing must meet identified local needs only.	Some development of market housing would be necessary to provide the needed affordable housing.	No change
	Development should not be allowed on greenfield sites in the villages.	Development may sometimes be necessary. Safeguards have been introduced into the policy.	No change.
	The 2.5% contributions to town centre improvements and open space should not be levied on affordable housing.	It is agreed that the priority should be not to increase the costs of developing affordable housing. It is agreed that the town centre/public realm improvement contribution should not be required. The provision of open space is a normal part of any housing development.	Amend criterion 6 to read: 'In respect of all proposals, located within settlements in which there are declared town centre or other public realm improvement schemes, a financial contribution of 2.5% of the open market value of each market dwelling is made towards those schemes;'
Defend Lytham	Supports Option C (Balanced Option)	Position Noted.	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
CROWD	Supports Option B but suggests that Freckleton, Warton and Wrea Green should be subject to the rural policy.	It is agreed that Freckleton and Wrea Green should be subject to the rural policy. Warton is a larger centre (defined as having equal status with Kirkham/ Wesham in the FBLP) capable of accepting a higher level of housing development. A change to criterion 1 has been recommended elsewhere.	No change.
Federation of Lancashire Civic Societies	Supports Option E (Preferred Option)	Support noted.	No change
St Thomas C of E Church, St Annes	Supports Option E (Preferred Option)	Support noted.	No change

Statutory and other Consultations: General Submissions

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
GONW	Under 'Arrangements for the provision of Affordable Housing' in the introduction, we recommend you provide a clearer explanation of why 43 dwellings should be provided on the second site.	Agreed.	Amend the policy by extending the para to read: 'E.g. where 100 market dwellings are being provided on the primary site, (at a rate of 30% affordable housing) 43 affordable dwellings (not 30) should be provided on the second site. This is to reflect the fact that 30% of all dwellings (on both sites) should be affordable i.e. 43 is 30% of 143.'
GONW	The status of the policy should be made clear in terms of existing development plans and national guidance.	Accepted	Amend the preamble by inserting: 'The IHP consists of two parts relating separately to the borough's urban and rural settlements. The policy is consistent with advice

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
			<p>contained within PPS 3: Housing and with the objectives and policies of the emerging Regional Spatial Strategy. The IHP has been prepared to complement the saved policies of the Fylde Borough Local Plan (As Altered) (Oct 2005).</p> <p>The IHP must be read together with all other planning policy, including national policy (mainly contained in Planning Policy Statements), the Regional Spatial Strategy and the adopted Fylde Borough Local Plan.</p>
Lancashire County Council	The relaxation of existing policy, to allow permissions within settlements other than the main urban areas of the district, would be premature and should await the findings of the Strategic Housing Land	Some development will be needed in the rural settlements to deliver affordable housing.	No change

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	Availability Assessment.		
Highways Agency	The policy should address the issues of accessibility and sustainability of sites. If this is not to be accommodated in the policy then reference should be made to other policies which would be relevant to determining planning applications.	These issues are covered in Policy HL2 of the Local Plan. The IHP has to be read in conjunction with the Local Plan.	See above.
North West Regional Development Agency	District Councils should not produce planning guidance other than SPD where the guidance is intended to be used in decision making or the co-ordination of development.	This point is understood. However, it is not possible to prepare an SPD since there is no parent policy in the Local Plan to which the SPD would be supplemental.	Amend the preamble by inserting: 'It should be noted that the document has been prepared as an informal document since preparation of a development plan document would have taken too long and there is no parent policy in the Local Plan in relation to which a supplementary planning document could have been produced.'
North West	Weight should also be given	Agreed. An amendment on	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Regional Assembly	to adopted and emerging RSS in determining planning applications.	this matter has been recommended elsewhere.	
	Support the provision of affordable housing on site.	Support noted.	No change.
	Support the provision of low cost market housing as part of the overall mix of housing.	Support noted.	No change.
CPRE	Supports the fact that no policy options allow housing development outside settlement boundaries.	Support noted.	No change.
	The terms 'urban' and 'rural' should not be applied since villages are not urban. Suggest using the terms 'towns' and 'villages'.		
	Supports two policy approach.	Support noted.	No change.
	The policy objectives should be at the beginning of the document.	Agreed.	Amend the preamble by including the policy objectives at the beginning of the document.
	The Sustainability Appraisal should have scored all options higher against the	Agreed. However, adding to the scores of all options would not have provided a	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	landscape / townscape objective since all options do not allow development on countryside area or green belt.	better basis for selection.	
	The sustainability Appraisal should have scored the sustainable options B higher since these did not allow development on green field sites.	Agreed. However, this would not have changed the outcome of the appraisal.	No change.
	The total scores should have been given in the Sustainability Appraisal.	Agreed. This would have made for greater clarity.	No change.
Environment Agency	Housing development allowed under this policy must be subject to the need to submit flood risk assessments in appropriate cases.	PPS 25 (Development and Flood Risk) provides detailed guidance in respect of Flood Risk Assessments. An amendment on this matter has been recommended elsewhere.	No change.
Natural England	Do not wish to comment in detail on the IHP full consideration should be given to biodiversity, geodiversity, landscape character,	The Interim Housing policy has to be read alongside the local plan, the Regional Spatial Strategy, and national planning guidance.	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	greenspace, soil conservation and similar interests.		
United Utilities	The Sustainability Appraisal Scoping report should include an objective to reduce potable water consumption.	This general point will be considered when the Scoping Report is up-dated.	No change.
Elswick PC	Elswick is not a sustainable location for development. Additional development would lead to an increased use of private vehicles, which would be contrary to government policy.	<p>One of the government's objectives is to create sustainable, inclusive, mixed communities in all areas, both urban and rural.</p> <p>The provision of affordable housing in any village would only be in response to local need. Additional housing development can make the village more sustainable by helping to support local shops and services, including schools.</p> <p>Some market housing in villages may be needed to cross-fund the provision of affordable housing.</p>	No change.
	It is highly unlikely that	This issue could be raised in	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	people in need of affordable housing would be able to afford to live in the village because of the distance from main services and the need to run a private vehicle.	relation to many rural villages which had relatively poor public transport links. The issue would have to be considered by any Social Registered Landlord which was party to any proposal to provide affordable housing.	
	It has yet to be demonstrated that the provision of affordable housing does not consequently increase the market value of private dwellings, thereby making them generally less affordable.	This comment is not understood.	No change.
	The social implications relating to mixed private/affordable developments are not considered.	Social inclusion, including the provision of mixed development schemes is a main tenet of government policy.	No change.
Staining PC	There appears to be no correlation between the number of affordable housing units and the housing waiting list.	The establishment of need for affordable housing is a complex matter which has to consider many issues, not just the housing waiting list.	No change.
Treales, Roseacre	Does not consider the policy	Comment noted.	No change.

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
and Wharles PC	objectives appraisal nor the sustainability appraisal to be sound on the basis that they do not allow adequate 'granularity' to assess the options.		
	Considers the definition of 'low cost market housing' should be based on an income to mortgage ratio of 3.5 not 3.3 as suggested in the consultation document.		
Little Eccleston with Larbreck PC	Considers that there should be a single policy which would apply to the urban and rural areas.	The PC has not indicated the nature or content of such a policy.	No change.
	Considers that all affordable housing should be provided on site. There should be no exceptions which allow for off site provision or payment of commuted sums.	There are likely to be cases where it would be difficult to provide affordable housing on the same site. The policy needs to be flexible to accommodate such situations.	No change.
	Considers the definition of 'low cost market housing' should be based on an income to mortgage ratio of 2.5 not 3.3 as suggested in		

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
	the consultation document. This would help to prevent the increase in house repossessions.		
St Annes on Sea TC	Objects to the amount of new housing for which Fylde will have to make provision. St Annes' infrastructure is stretched already.	The Council has no choice other than to accept the housing requirement figure contained in (draft) RSS when this is finally published. If housing provision is not made by the Council, it would be made by the Secretary of State through the appeals system.	No change.

Development Industry and Associated Professions: Urban

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Kensington Developments Simply Housing Ltd NJL Consulting Cass Associates Metacre Ltd Croft Goode Ltd Thompson Developments Wolstenhome Signs Architectural	<p>Sustainable urban extensions for housing should be examined / supported by the IHP.</p> <p>Kensington Developments submit that criterion 1 should be amended to read:</p> <p>'The application site is within, or on the edge of the settlement of Lytham St Annes.....'.</p>	<p>One of the objectives of the IHP is to avoid undermining the purpose and function of the future Local Development Framework.</p> <p>It is the purpose of the Core Strategy and Land Allocation Development Plan Documents to decide if and where urban extensions should be promoted.</p> <p>Allowing development outside the settlement boundaries defined in the Local Plan would place the IHP in conflict with the statutory development plan.</p> <p>Planning applications promoting housing development outside the settlement boundaries will have to be considered having regard to the development plan and other material considerations.</p>	No change

Design Service			
New Fylde Housing	Supports option E but the policy should make provision for greenfield urban extensions where this would allow the development of 100% affordable housing schemes .	See comments above.	No change.
H Greaves & Co Dreem Kitchens Creative Windows Ltd	The Queensway housing development should be supported in particular to ensure the funding of the M55 link road.	See comments above.	No change.
Pete Marquis Skip Hire Wolstenhome Signs Dreem Kitchens Creative Windows Ltd Architectural Design Service	The link road across the Moss is needed urgently. This should be paid for by developers of new sites.	This may well be the case but the IHP is not the mechanism to make decisions on urban extensions.	No change.
Cass Associates	The Urban Options are overly restrictive since all of the stated	In a criteria based policy, it is reasonable for proposals to have to meet all of the	No change.

	criteria have to be met. Proposals should be considered having regard to factors inc their potential regeneration benefits, economic viability or the sustainability of the location.	criteria.	
Mr W Cowburn	Supports Option A (Delivery Option) subject to no financial contributions being sought.	Position noted.	No change.
Blackpool Airport	Supports Option A (Delivery Option).	Position noted. The delivery option would not make sufficient provision for sustainable homes.	No change.
Home Builders Federation	Supports Option A (Delivery Option) but is concerned with the affordable housing requirements which are onerous and are not supported by a Strategic Housing market Assessment (SHMA).	The SHMA has been completed and does identify the need for a high level of affordable housing.	No change.
Rowland Homes Kensington Developments Cass Associates Metacre Ltd	Supports Option E with criteria 2 deleted or amended.	Because of the informal status of the IHP, it must be read together with the Local Plan and may not conflict with it.	No change.

J Nickson & Sons (Builders) Graterest Ltd Newbury Properties K & B Bell Rowe Bros Ltd Paul Harrison Construction			
Kensington Developments	In Option E suggests amendment to criterion 3 by adding: c. the development of the site provides for infrastructure improvements which benefit the wider area.	Infrastructure improvements can only be negotiated if they are related in scale and kind to the particular development.	No change.
Rowland Homes J Nickson & Sons (Builders) Graterest Ltd	Suggests Option E with criteria 4 deleted. Aldi says there is no need for this criteria as the issue is generally covered in PPS1 and	It is agreed that the requirement to plan for sustainable and mixed communities exists in Planning Policy Statements. Also there is an argument for deleting this criteria as all sites within the settlement boundaries would be sustainable having	Amend Option E by deleting criterion 4.

Newbury Properties K & B Bell Rowe Bros Ltd Paul Harrison Construction Aldi Stores Ltd	PPS3.	reasonable access to employment, retail, education and other facilities.	
Cass Associates	In criterion 4, the terms 'mixed development scheme' and 'sustainable and mixed community' should be defined.	See above.	Amend Option E by deleting criterion 4.
Metacre Ltd	Criterion 4 should be amended to 'encourage' mixed development'.	See above.	Amend Option E by deleting criterion 4.
Newfield Jones Homes Brooklands Developments Rowland Homes	Criteria 6 should be deleted from Option E.	It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that housing delivery should be informed by the Strategic Housing market Assessment. Some modification has been suggested so as to give additional	Amend criterion 6 to read 'In respect of proposals involving 10 dwellings or more, where appropriate, the mix of housing types, sizes and tenures reflects local housing requirements, and is consistent with the findings of the

Fylde Architects & Surveyors Mellor Architects Metacre J Nickson & Sons (Builders) Edenfield Homes Ltd Graterest Ltd Newbury Properties K & B Bell Rowe Bros Ltd Paul Harrison Construction Fylde Building Services Ltd Chelford Homes		flexibility for developments to respond to local circumstances.	Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment. The Council will encourage the provision of low cost market housing as part of the normal mix of market housing.'
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<p>JG Builders</p> <p>Chapman Building Contractors</p> <p>Croft Goode Partnership</p>			
Aldi Stores Ltd	Suggests Option E with criteria 6 amended to have regard to not just to SHMA but local character.	The amendment suggested above which includes the term 'where appropriate' will provide the necessary flexibility to have regard to local character.	No change.
<p>Newfield Jones Homes</p> <p>Morris Homes</p> <p>Brooklands Developments</p> <p>Rowland Homes</p> <p>Fylde Architects & Surveyors</p> <p>Mellor</p>	Criteria 7 should be deleted from Option E.	It is agreed that at a time when there appears to be a housing recession, the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes would place additional significant financial constraints on the house-building industry. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations. It is considered that now is not the right time to pursue this matter through the planning process.	Amend the policy by deleting criterion 7.

Architects			
Metacre			
J Nickson & Sons (Builders)			
Edenfield Homes Ltd			
Graterest Ltd			
Newbury Properties			
K & B Bell			
Rowe Bros Ltd			
Paul Harrison Construction			
Fylde Building Services Ltd			
Chelford Homes			
JG Builders			
Chapman			

Building Contractors			
Croft Goode Partnership			
Newfield Jones Homes	Criteria 8 should be deleted from Option E. No affordable housing contributions would be eligible on schemes of 9 units or less.	<p>It is considered very reasonable that small schemes should pay a modest contribution towards the facilitation of affordable housing.</p> <p>It is understood that both Blackpool and Wyre Councils are interested in following this approach.</p>	No change.
Brooklands Developments			
Rowland Homes			
Fylde Architects & Surveyors			
Mellor Architects			
Bromley Parker Architects			
Anthony Hart Design Ltd			
Croft Goode Partnership			

R.V. Hopper			
Firth Associates			
J Nickson & Sons (Builders)			
Chapman Building Contractors			
Chelford Homes			
Edenfield Homes Ltd			
Fylde Building Services Ltd			
JG Builders			
K & B Bell			
Newbury Properties			
Paul Harrison Construction Ltd			
Rowe Bros			

<p>Builders</p> <p>Rowland Homes Ltd</p> <p>Graterest Ltd</p> <p>Sharples Ltd</p> <p>Mr W Cowburn</p> <p>Mr S Chaliner</p> <p>Mr G Sread</p> <p>Mt B Moorhouse</p>			
<p>Cass Associates</p> <p>Aldi Stores Ltd</p>	<p>Criterion 8 should provide scope for negotiation through independent economic viability appraisals.</p>	<p>Agreed.</p>	<p>Amend the introduction by inserting the following:</p> <p><u>Financial Contributions</u></p> <p>‘The Interim Housing Policy indicates that the Council will seek certain financial contributions towards infrastructure, in particular, open space (where this is not being provided on site) public realm works (where there are identified schemes</p>

			in the area) and affordable housing (on sites below 15 dwellings). The size of the contributions being sought are considered to be very low, such that the Council expects that these will be paid in full in most circumstances. However it is not the objective of the Council to make otherwise acceptable schemes unviable. Where developers wish to contest payment of the contribution(s) on the basis that they would make a scheme uneconomic, the Council will require the developer to demonstrate this through an independent economic viability appraisal which is subject to validation. The Council prioritises the contributions in the following order: Firstly, affordable housing; secondly, public open space; thirdly town centre/public realm improvements.'
Newfield Jones Homes Brooklands Developments Rowland Homes	Criteria 9 should be modified to set a minimum threshold of 15 units below which no affordable housing would be sought.	This suggestion is compatible with the national indicative minimum site size advocated by the government. It is agreed that the threshold should be raised. Note: financial contributions on schemes under 15 dwellings are recommended to become payable.	Amend criteria 8 and 9 of Option E to refer to a threshold of 15 dwellings.

Fylde Architects & Surveyors			
Mellor Architects			
Metacre			
J Nickson & Sons (Builders)			
Edenfield Homes Ltd			
Graterest Ltd			
Newbury Properties			
K & B Bell			
Rowe Bros Ltd			
Paul Harrison Construction			
Fylde Building Services Ltd			
Chelford Homes			

<p>JG Builders</p> <p>Chapman Building Contractors</p> <p>Croft Goode Partnership</p>			
<p>Newfield Jones Homes</p> <p>Brooklands Developments</p> <p>Rowland Homes</p> <p>Simply Housing Ltd</p> <p>Kensigton Developments</p> <p>Fylde Architects & Surveyors</p> <p>Mellor Architects</p>	<p>Criteria 9 should be modified to indicate that 20% (max) of the dwellings should be affordable.</p>	<p>It is considered that a figure of 20% would be too low. Evidence suggests that a 30% or higher element of affordable housing could be achieved in most circumstances. Recent studies have confirmed the need to provide a high level of affordable housing.</p>	<p>No change.</p>

J Nickson & Sons (Builders)			
Edenfield Homes Ltd			
Graterest Ltd			
Newbury Properties			
K & B Bell			
Rowe Bros Ltd			
Paul Harrison Construction			
Fylde Building Services Ltd			
Chelford Homes			
JG Builders			
Chapman Building Contractors			

Shenton Homes Cass Associates Aldi Stores Ltd	<p>Requiring 30% or more affordable homes would render some sites uneconomic.</p> <p>This should be subject to negotiation to take into account the economic viability of the scheme.</p>	<p>No evidence has been submitted to support this comment. We know that 40% affordable housing elements have recently been achieved in Fylde Borough.</p> <p>However, it is recognised that some sites may not be able to meet the 30% target figure. The amendment to the Introduction above indicating that all the contributions are subject to negotiation if viability of the scheme is threatened, should attend to the stated concerns.</p>	No change.
New Fylde Housing	Supports the provision of 30% affordable housing but considers that higher requirements may harm the delivery of market housing 9 (and thus affordable housing).	Support noted.	No change.
Metacre	Although the requirement in criterion 9 to provide 30% affordable housing is the most appropriate of the options, it would have been better to debate this once the findings of the SHMA are published.	There is some merit in this comment. However, there is no doubt that the need for affordable housing has significantly increased since the 2002 Housing Needs Survey.	No change.

Steven Abbott Associates	The level of affordable housing (30%) to be provided in the preferred option E is the most suitable.	Comment noted.	No change.
Anyon Architectural & Planning Ltd Dpt Mackeith Dickinson & Partners Ltd Richard Ansell Ltd	There should be no affordable homes requirement at all.	PPS 3: Housing requires local planning authorities to set out its approach to seeking developer contributions to the provision of affordable housing. Recent studies have demonstrated very high levels of need for affordable housing in the borough.	No change.
Newfield Jones Homes Brooklands Developments Kensigton Developments Rolland Homes	Criteria 10 should be deleted from Option E. (Town centre and public realm contributions)	It is acknowledged that a financial contribution must be justified having regard to schemes which have some relevance to the proposed development. An amendment to the preamble has been previously recommended.	No change.

<p>Morris Homes</p> <p>Rushcliffe Properties</p> <p>Bromley Parker Architects</p> <p>Anthony Hart Design Ltd</p> <p>R.V. Hopper</p> <p>Metacre</p> <p>J Nickson & Sons (Builders)</p> <p>Edenfield Homes Ltd</p> <p>Graterest Ltd</p> <p>Newbury Properties</p> <p>K & B Bell</p> <p>Rowe Bros Ltd</p>			
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Paul Harrison Construction Fylde Building Services Ltd Chelford Homes JG Builders Chapman Building Contractors Sharples Ltd Mr S Chaliner Mr G Sread Mt B Moorhouse			
Cass Associates	Criterion 10 should provide scope for negotiation through independent economic viability appraisals.	Agreed. It is acknowledged that a financial contribution must be justified having regard to schemes which have some relevance to the proposed development.	No change.

		An amendment to the preamble has been previously recommended.	
New Fylde Housing	The 2.5% contributions to town centre improvements and open space provision should not be levied on affordable housing.	<p>The same issue has been identified by CRPE. It is agreed that the priority should be not to increase the costs of developing affordable housing. It is agreed that the town centre/public realm improvement contribution should not be required. The provision of open space is a normal part of any housing development.</p> <p>An amendment to the policy has been previously recommended.</p>	No change.
Aldi Stores	Not all housing development will necessitate public realm or town centre improvements.	Agreed. An amendment to the policy has been previously recommended.	No change.
Newfield Jones Homes Brooklands Developments Rolland Homes Morris Homes Rushcliffe Properties	Criteria 11 should be deleted from Option E. (Public open space contributions)	<p>It is agreed that 2.5% should be a maximum figure and subject to negotiation.</p> <p>An amendment to the policy has been previously recommended.</p>	No change.

Bromley Parker Architects			
Anthony Hart Design Ltd			
R.V. Hopper			
Metacre			
J Nickson & Sons (Builders)			
Edenfield Homes Ltd			
Graterest Ltd			
Newbury Properties			
K & B Bell			
Rowe Bros Ltd			
Paul Harrison Construction			
Fylde Building Services Ltd			

Chelford Homes JG Builders Chapman Building Contractors Sharples Ltd Mr W Cowburn Mr S Chaliner Mr G Sread Mt B Moorhouse			
Cass Associates	Criterion 11 should provide scope for negotiation through independent economic viability appraisals.	Agreed. An amendment to the policy has been previously recommended.	No change
Newfield Jones Homes Brooklands Developments	A new policy should be included specifying that affordable housing should not be sought on developments of sheltered housing since this would be impractical.	No justification for this comment is provided. Sheltered housing is just one type of market housing. If there are genuine difficulties in respect of managing a scheme including	No change.

Edenfield Homes Ltd Fylde Building Services Ltd Chelford Homes JG Builders Chapman Building Contractors		affordable units then the affordable housing could be provided off-site within the terms set out in the pre-amble..	
Kensington Developments	The provision of some low cost market housing is supported.	Support noted.	Amend option E by adding a new sentence to criterion 6: ‘The Council will encourage the provision of low cost market housing as part of the normal mix of market housing.’
Kensington Developments	Clearer guidance should be given on how low cost housing is defined.	Agreed. An amendment to the policy has been previously recommended.	No change.
Cass Associates	The policy should be more restrictive towards the development of greenfield sites and impose a sequential test	Option E seeks to prioritise previously developed land by restricting the release of green field land unless there is less than a five year supply of land.	No change.

	that prioritises previously developed land..		
Metacre	The proposed arrangement whereby payment of 80% of the contributions has to be made before the commencement of development should be deleted since the matter could be dealt with by conditions.	Whether the matter is to be dealt with by conditions or a Legal Agreement, it is better to advise of the arrangement within the policy for the avoidance of doubt.	No change.
H3H Developments Ltd Great Places Housing Group Mason Gillibrand Architects	Supports Option E	Support Noted	No change.

Development Industry and Associated Professions: Rural

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Great Places Housing Group Mason Gillibrand Architects	Supports Option E	Support Noted	No change.
Kensington Developments	Criteria 1 of Option E should read: 'The application site is within the settlement boundaries of one of the following settlements as defined in the Fylde borough Local Plan (As Altered) (Oct 2005): Freckleton, Warton, Wrea Green, Staining, Elswick, Newton,	There is agreement with this with the exception of Warton appearing in the rural policy. This is recommended to go in the urban policy on the basis that it has the same status as Kirkham/Wesham in the Local Plan.	No change.

	Clifton, Little Ecclestone, Treales, Wharles, Weeton and Singleton.'		
J G Builders Chelford Homes Fylde Building Services Paul Harrison Construction Ltd K & B Bell Newbury Properties Edenfield Homes Ltd Rowe Bros Ltd Graterest Ltd Newfield	In Option E, seek the deletion of criterion 6 (2.5% contribution towards town centre and public realm improvements).	Contributions to town centre and public realm improvements are justified in settlements where there are declared improvement schemes. Recommended changes to the policy have been made elsewhere to address this point.	No change.

Jones Homes			
Morris Homes			
Brooklands Developments			
Chapman Building Contractors			
Rowland Homes			
Rushcliffe Properties Ltd			
Fylde Architects & Surveyors			
Mellor Architects			
Metacre			
Croft Goode Partnership			

New Fylde Housing	The 2.5% contribution to town centre improvements should not be levied on affordable housing.	It is agreed that the priority should be not to increase the costs of developing affordable housing. It is agreed that the town centre/public realm improvement contribution should not be required. The provision of open space is a normal part of any housing development.	Amend criterion 10 to read: 'In respect of all proposals, located within settlements in which there are declared town centre or other public realm improvement schemes, a financial contribution of 2.5% of the open market value of each market dwelling is made towards those schemes;'
Newfield Jones Homes Brooklands Developments Chapman Building Contractors Rowland Homes Morris Homes Rushcliffe Properties Ltd J G Builders Chelford	In Option E, seek the deletion of criterion 7 (2.5% contribution towards open space improvements).	No justification for this comment is provided. Contributions to open space improvements are justified where no on site provision is being made. The principle is already established by Policy TREC 17 in the FBLP Recommended changes to the policy have been made else where to address this point.	No change.

Homes			
Fylde Building Services			
Paul Harrison Construction Ltd			
K & B Bell			
Newbury Properties			
Edenfield Homes Ltd			
Rowe Bros Ltd			
Graterest Ltd			
Fylde Architects & Surveyors			
Mellor Architects			
Metacre			

Croft Goode Partnership			
New Fylde Housing	The 2.5% contribution for open space should not be levied on affordable housing.	The provision of open space is a normal part of any housing development irrespective of whether it is market or affordable housing.	No change.
Newfield Jones Homes Brooklands Developments Chapman Building Contractors Rowland Homes Morris Homes J G Builders Chelford Homes	In Option E, seeks to delete criterion 8 i.e. that dwellings should meet level 3 in the Code for Sustainable Homes.	The Council has been accepted into the Energy Saving Trust's Key Account Programme whose aim is to assist in identifying actions which will address climate change through sustainable energy management. The Council's policy is to progress minimisation of energy use and other sustainability issues through the use of the Code for Sustainable Homes.	No change.

Fylde Building Services			
Paul Harrison Construction Ltd			
K & B Bell			
Newbury Properties			
Edenfield Homes Ltd			
Rowe Bros Ltd			
Graterest Ltd			
Fylde Architects & Surveyors			
Mellor Architects			
Croft Goode Partnership			

Metacre			
Mr W Cowburn	Supports Option A (Delivery Option) but with no financial contributions required.	The delivery option would not make sufficient provision for sustainable homes.	No change.
Blackpool Airport Home Builders Federation	Supports Option A (Delivery Option)	Position noted. The delivery option would not make sufficient provision for sustainable homes.	No change.
Anyon Architectural & Planning Ltd Dpt Mackeith Dickinson & Partners Ltd Richard Ansell Ltd	There should be no affordable homes requirement.	PPS 3: Housing requires local planning authorities to set out its approach to seeking developer contributions to the provision of affordable housing.	No change.
Metacre Ltd	The protection of	The Local Plan is part of the	No change.

	<p>sites allocated/ designated for other purposes in the Local Plan (criterion 2) should be deleted since such land may be required to meet the 5 year housing requirement.</p>	<p>statutory development plan.</p> <p>The informal IHP cannot override existing statutory policies.</p>	
	<p>The development of green field infill plots should be allowed in rural settlements to meet the need to provide a 5 year housing supply of land.</p>	<p>Agreed.</p>	<p>Amend the policy criterion to read:</p> <p>‘In respect of greenfield sites, the applicant is able to show that there is a need for the development of the site (i.e. that there is less than a 5 year supply of land within the borough as a whole);’</p>
	<p>Criterion 5 should be deleted since it is too onerous. At the very least small infill proposals of one dwelling ought to be allowed as simply contributing towards the general housing needs of the settlement.</p>	<p>It is agreed that criterion 5 requires further clarification.</p> <p>There is a need for about 50 affordable dwellings per year in the rural villages (Housing Needs and Demand Study: 2008). To meet this need, on larger schemes (4 dwellings or over) 30% of dwellings should be affordable, subject to scheme viability. On smaller</p>	<p>Amend policy criterion to read:</p> <p>‘In respect of proposals involving 5 dwellings or less a financial contribution of 5% of the open market value of each dwelling will be sought towards the facilitation of affordable housing within the borough. Financial contributions will not be sought in respect of any affordable dwellings within the scheme.*’</p> <p>Add new criteria to read:</p>

		<p>schemes (3 dwellings or less) a financial contribution will be appropriate.</p>	<p>In respect of proposals of 4 or more dwellings, the Council will require 30% of the dwellings to be affordable unless the developer can demonstrate by means of verifiable evidence that the development would not be viable with that percentage;</p> <p>All affordable dwellings should be delivered through Registered Social Landlords or local trusts with approved agreements in place to ensure that homes are available as affordable housing in perpetuity, subject to the ability of shared ownership leaseholders to “staircase”;</p> <p>Whilst the priority will nearly always be to provide social rented housing (consistent with the findings of the Fylde Housing Needs and Demand Study of January 2008, and the Fylde Coast Strategic Housing Market Assessment) an element of intermediate affordable housing may be appropriate (subject to it being provided at genuinely affordable rents and prices) where:</p> <ul style="list-style-type: none"> • in the opinion of the Council, a development site is located in an area that already has a high proportion of socially rented homes such that this would not represent the priority for provision; • the development proposal is for 100% affordable housing and is either submitted by a
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			<p>Registered Social Landlord or has financial support by the Housing Corporation;</p> <ul style="list-style-type: none"> • an up-to-date local housing needs survey demonstrates a particular need for intermediate affordable housing. <p>The size of affordable units in development proposals should reflect local requirements and should proportionately reflect the mix of dwelling sizes of the whole development. The affordable units should meet the Housing Corporation's 'Design and Quality Standards'. Homes provided as affordable housing should not be separated on one part of the development site, but should be mixed in with the homes for open market sale. The elevational treatments of the affordable units should be indistinguishable from the homes for open market sale.</p> <p>In all but exceptional cases, the requirement for affordable housing provision should be met on the site of the development proposal. Reference to the very limited circumstances where it may be appropriate for the developer to meet the affordable housing requirement on an alternative site, or by making a financial payment to enable the provision of affordable housing elsewhere is provided within the preamble to the policy;</p>
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	The proposed arrangement whereby payment of 80% of the contributions has to be made before the commencement of development should be deleted since the matter could be dealt with by conditions.	Whether the matter is to be dealt with by conditions or a Legal Agreement, it is better to advise of the arrangement within the policy for the avoidance of doubt.	No change.
Steven Abbott Associates	The preferred rural option should make provision for the development of sustainable rural sites in greenbelt locations.	Unless the need to release land in the green belt for development is clearly identified, protection of green belt will be continued.	No change.

Non Development Commercial Interests: Urban

Birchwood Nurseries	Sustainable urban extensions for housing should be examined / supported by the IHP.	<p>One of the objectives of the IHP is to avoid undermining the purpose and function of the future Local Development Framework.</p> <p>It is the purpose of the Core Strategy and Land Allocation Development Plan Documents to decide if and where urban extensions should be promoted.</p> <p>Allowing development outside the settlement boundaries defined in the Local Plan would place the IHP in conflict with the statutory development plan.</p> <p>Planning applications promoting housing development outside the settlement boundaries will have to be considered having regard to the development plan and other material considerations.</p>	No change.
Cox Motor Group Stanways of Lytham	The Queensway housing development should be supported in particular to ensure	See comments above.	No change.

Moorland Motors Ltd Tye The Knot Derek Woodman Ltd	the funding of the M55 link road.		
Cox Motor Group Moorland Motors Ltd Tye The Knot Birchwood Nurseries	The link road across the Moss is needed urgently. This should be paid for by developers of new sites.	This may well be the case but the IHP is not the mechanism to make decisions on urban extensions.	No change.
DS & CM England	Supports Option E with criterion 6 deleted.	<p>It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that housing delivery should be informed by the Strategic Housing market Assessment.</p> <p>An amendment has already been recommended to address this issue.</p>	No change.

DS & CM England	Suggests Option E with criteria 7 deleted	<p>The Council has been accepted into the Energy Saving Trust's Key Account Programme whose aim is to assist in identifying actions which will address climate change through sustainable energy management.</p> <p>The Council's policy is to progress minimisation of energy use and other sustainability issues through the use of the Code for Sustainable Homes.</p>	No change.
DS & CM England	Suggests Option E with criteria 8 deleted (No affordable housing contribution on schemes less than 15 units.	<p>It is considered very reasonable that small schemes should pay a modest contribution towards the facilitation of affordable housing.</p> <p>It is understood that both Blackpool and Wyre Councils are interested in following this approach.</p>	No change.
DS & CM England	New criteria 9 with minimum threshold at 15 units.	<p>This suggestion is compatible with the national indicative minimum site size advocated by the government. It is agreed that the threshold should be raised. Note: financial contributions on schemes under 15 dwellings are recommended to become payable.</p> <p>Amendments have already been made to address this issue.</p>	No change.
DS & CM	New criteria 9: 20%	It is considered that a figure of 20% would be	No change.

England	(max) affordable housing requirement.	too low. Evidence suggests that a 30% or higher element of affordable housing could be achieved in most circumstances. Studies have confirmed the need to provide a high level of affordable housing.	
DS & CM England	Suggests Option E with criteria 10 deleted	<p>It is acknowledged that a financial contribution must be justified having regard to schemes which have some relevance to the proposed development.</p> <p>Recommended amendments have already been made to address this issue.</p>	No change.
DS & CM England	Suggests Option E with criteria 11 deleted	<p>It is agreed that 2.5% should be a maximum figure and subject to negotiation.</p> <p>Recommended amendments have already been made to address this issue.</p>	No change.
DS & CM England	A new policy should be included specifying that affordable housing should not be sought on developments of sheltered housing	<p>No justification for this comment is provided. Sheltered housing is just one type of market housing.</p> <p>If there are genuine difficulties in respect of managing a scheme including affordable units then the affordable housing could be provided off-site.</p>	No change.

	since this would be impractical.		
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Non- Developers Commercial: Rural

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Cox Motor Group Stanways of Lytham Moorland Motors Ltd Tye The Knot Derek Woodman Ltd	Supports Option E (preferred option)	Support noted.	No change.
DS & CM England	Criteria 6 should be deleted from Option E.	Contributions to town centre and public realm improvements are justified in settlements where there are declared improvement schemes. Recommended changes to the policy have been made else where to address this point.	No change.

DS & CM England	Criteria 7 should be deleted from Option E.	<p>No justification for this comment is provided.</p> <p>Contributions to open space improvements are justified where no on site provision is being made. The principle is already established by Policy TREC 17 in the FBLP</p> <p>Recommended changes to the policy have been made else where to address this point.</p>	No change.
DS & CM England	Criteria 8 should be deleted from Option E.	<p>The Council has been accepted into the Energy Saving Trust's Key Account Programme whose aim is to assist in identifying actions which will address climate change through sustainable energy management.</p> <p>The Council's policy is to progress minimisation of energy use and other sustainability issues through the use of the Code for Sustainable Homes.</p>	No change.

General Public: Urban

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Andy Baker Sherrill E Whalley Mr A E Eades	Supports Option B (Sustainable Option)	The sustainable option is unlikely to deliver the housing requirement contained in the Regional Spatial Strategy.	No change.
Mr D Parrington Harold Butler	Supports Option D (Do Nothing Option). There should be no more house building at all.	This option would contradict much government guidance and the RSS. It would ignore the needs of people for decent homes.	No change.
Professor Bill Winlow Mr R M G Fielding	Supports Option E but with the requirement that new housing meets level 6 in the Code for Sustainable Homes.	Level 6 would involve loading significant additional costs on the house building industry in a period of housing recession.	No change.
Mr R B Morgan FRICS Barrie Russell James Cartmell Miss N Curran Mr D Gosling Mr J Threlfall E Threlfall Helen Threlfall Miss C Threlfall Mrs A Threlfall Mr D Mitchel Mr N Farley	Supports Option E (preferred Option)	Support noted.	No change.

<p>Mr P S Harrison R Yeomans Cllr D R Nicholls Cllr P Ursell (Westby PC) Mr D Donaldson Mr K Bennett Mr P Ursell</p>			
<p>Mr R.T. Howe Mrs DJ Howe Mr SA Holt Mrs A Holt Ms T Firth Mr M Hawe Mr N T Hawe Mr D Long Mr R Atherton Mr P Liversidge Mrs C Liversidge Mr D Tingle Mrs J Tingle Mr W Ingham C E Needham Mr M Wells Mr J Lewis Mrs AJ Steel Mr J Bell Mr W Riley Mr D Graham</p>	<p>Sustainable urban extensions for housing should be examined / supported by the IHP.</p>	<p>One of the policy objectives is to avoid undermining the purpose and function of the future Local Development Framework.</p> <p>It is the purpose of the Core Strategy and Land Allocation Development Plan Documents to decide if and where urban extensions should be promoted.</p> <p>Allowing development outside the settlement boundaries defined in the Local Plan would be contrary to the Local Plan.</p> <p>Planning applications promoting housing development outside the settlement boundaries would have to be considered having regard to the development plan</p>	<p>No change.</p>

Mr N Tarris Ms J C Graham Mr T Barker Miss P J Rigg Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs S Ashton Mrs L Bunn Steve Bennett Victoria Bennet Mr S Parkinson		and other material considerations.	
Mr R.T. Howe Mrs DJ Howe Mr S Howe Mr SA Holt Mrs A Holt David Firth Margaret Firth Tara Firth Allan Sumner David Long Roy Walker David Barrow Mr P Liversidge David Tingle Malcolm Watson Mr W Ingham	The Queensway housing development should be supported in particular to ensure the funding of the M55 link road.	See above. The planning application for residential development at Queensway will be determined on the basis of the development plan and other material considerations. For the reasons stated above it is not legitimate for the IHP to overrule the statutory Local Plan.	No change.

Ms K Wilkinson Mr T M Murphy Mr G Patten Mr D Graham Ms J C Graham Mrs M Edge Mr T Edge Mr I Baxter Mr W J Baxter Miss P J Rigg Miss C Sawyer Mr S J Totty Mrs S Ashton Mrs L Halstead			
C E Needham Mr M Wells Mr N T Hawe Mr A Dean Mrs AJ Steel Mr J Bell Mr W Riley Mr B Atkinson Mr J Lyons Mr N Tarris Ms J C Graham Mr T Barker Margaret Firth David Firth	The link road across the Moss is needed urgently. This should be paid for by developers of new sites, not by the Council.	Where the Council is minded to grant planning permission for developments which would result in significantly increased traffic on the Moss Road, contributions will be sought from developers, irrespective of whether the developments fall within the scope of the IHP or not.	No change.

Mr SA Holt Mrs A Holt Mr R Atherton Mr P Liversidge Mr W Ingham Mr J Lewis Miss C Sawyer	The current search for appropriate housing sites should start with an update of the former local plan housing allocations.	The IHP does not involve a search for housing sites. This is a matter for the Local Development Framework.	No change.
Mr A Dean	All sites should be examined for their suitability.	See above.	No change.
Mrs L Jackson Mr K Armistead Mr S Hart Mr P Holden Mr D Kerry Mr A Martin Mr & Mrs J Ashworth Mr D Simpson Mrs A Simpson Mrs Y Rigby Mr J Neary Mrs V Russell Mr S Parkinson	Suggests Option E with criteria 2 deleted (application site not designated for other purposes in the Local Plan)	Allowing housing development on sites protected for other land use purposes in the Local Plan would self evidently be contrary to the Local Plan.	No change.

Mrs L Jackson Mr K Armistead Mr S Hart Mr P Holden Mr D Kerry Mr A Martin Mr & Mrs J Ashworth Mr D Simpson Mrs A Simpson Mrs Y Rigby Mr J Neary Mrs V Russell	Suggests Option E with criteria 4 deleted	This is agreed. In response to a representation from Blackpool Council, it is recommended that criterion 4 is deleted.	No change.
Mr J Hayfield Mr N Hill Mr M Cannon Mrs L Jackson Mrs B Jennings Mr K Armistead Mr S Hart Mrs P Carling Mr H Carter Mrs K McKearnen Mr & Mrs Butler	Suggests Option E with criteria 6 deleted	It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that housing delivery should be informed by the Strategic Housing market Assessment. A recommendation has	No change.

Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mr D Simpson Mrs A Simpson Ms L Fenton Mr S Thorley Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennett		previously been made on this issue.	
Mr J Hayfield Mr N Hill	Suggests Option E with criteria 7 deleted.	It is agreed that at a time when there appears to be a housing	Amend the policy by deleting criterion 7.

Mr M Cannon Mrs L Jackson Mrs B Jennings Mr K Armistead Mr S Hart Mrs P Carling Mr H Carter Mrs K McKearnen Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mr D Simpson Mrs A Simpson Ms L Fenton Mr S Thorley Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr A Almond Catherine Ashton		recession, the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes would place additional significant financial constraints on the house-building industry. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations. It is considered that now is not the right time to pursue this matter through the planning process.	
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Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennet			
Mr J Hayfield Mr N Hill Irene and Ian Hart Mr K Armistead Mr S Hart Mrs P Carling Mrs B Jennings Mr M Cannon Mr H Carter Mrs K McKearnen Mr R Gillet Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr P Mayall Mr A Needham Mr D Simpson Mrs A Simpson Mr S Stansfield	Suggests Option E with criteria 8 deleted (No affordable housing contribution on schemes less than 15/16/17 units.	Agreed. A recommendation has previously been made on this issue.	No change.

Ms L Fenton Mrs E Ebrey Mr S Thorley Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr D Jackson Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennet			
Mr J Hayfield Mr & Mrs Hayfield Mr N Hill Mr M Cannon Mr K Armistead Mrs P Carling Mrs B Jennings Mr & Mrs D Bell Mr S Hart Mr H Carter Mrs K McKearnen	New criteria 9 with minimum threshold at 15/16/17.	Agreed. A recommendation has previously been made on this issue.	

Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mr D Simpson Mrs A Simpson Ms L Fenton Mr S Thorley Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling M A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennet			
Mr & Mrs K Bell	New criteria 9 with minimum threshold at 24.	This threshold would not provide sufficient affordable housing.	No change.

Mr P Liversidge	New criteria 9: 10% (max) affordable housing requirement.	This threshold would not provide sufficient affordable housing.	No change.
Mr J Hayfield Mr N Hill Mr M Cannon Mr K Armistead Mr S Hart Mrs P Carling Mrs B Jennings Mr H Carter Mrs K McKearnen Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mr D Simpson Mrs A Simpson Ms L Fenton Mr S Thorley Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson	New criteria 9: 20% (max) affordable housing requirement.	This threshold would not provide sufficient affordable housing.	No change.

Mr R Cottam Mrs V Russell Ms L Carling Ms J C Graham Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs S Ashton Mrs L Bunn Steve Bennett Victoria Bennet			
Mr & Mrs K Bell Mr & Mrs Hayfield	New criteria 9: 25% (max) affordable housing requirement.	This threshold would not provide sufficient affordable housing.	No change.
Mr SA Holt Mrs A Holt	New criteria 9: 30% (max) affordable housing requirement.	This is the recommended percentage in the preferred option.	No change.
Mr J Bell	Affordable housing at this level (30%) stops development.	The evidence is that some developments could support 40% affordable housing.	No change.
Mrs S Heaton Mr B English Mrs J Hardy Mr S Whitaker Mr & Mrs A Dean Mrs S Hill	There should be no affordable housing requirement at all.	It is government policy to make provision for affordable housing through the private housing sector.	No change.
Mr J Hayfield	Suggests Option E with criteria	It is important that where new	No change.

Mr N Hill Mrs S Hill Irene and Ian Hart Mr M Cannon Mrs L Jackson Mrs B Jennings Mr S Hart Mrs P Carling Mrs K McKearnen Mr & Mrs Butler Mr P Holden Mr D Kerry Mr A Martin Mrs E Lavender Mr & Mrs J Ashworth Mr D Simpson Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennet	10 deleted	housing is developed, the developer makes an appropriate contribution towards essential community infrastructure.	
Mr J Hayfield	Suggests Option E with criteria	The ability to make financial	No change.

Mr N Hill Mrs S Hill Irene and Ian Hart Mr M Cannon Mrs L Jackson Mrs B Jennings Mr S Hart Mrs P Carling Mrs K McKearnen Mr & Mrs Butler Mr P Holden Mr D Kerry Mr A Martin Mrs E Lavender Mr & Mrs J Ashworth Mr D Simpson Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr A Almond Catherine Ashton Phil Ashton Mrs L Bunn Steve Bennett Victoria Bennet	11 deleted	payments in lieu of on-site open space provision in certain circumstances is recorded in the Local Plan. It is important that where new housing is developed, the developer makes an appropriate contribution towards essential community infrastructure.	
Mr J Hayfield Mr & Mrs Hayfield Mr N Hill	The policy should not require affordable housing in respect of sheltered schemes since	No justification for this comment is provided. Sheltered housing is just one type of market housing.	No change.

<p> Mrs P Carling Mrs B Jennings Mr M Cannon Mr & Mrs D Bell Mr & Mrs K Bell Mrs K McKearnan Mr & Mrs Butler Mrs E Lavender Mrs J Mathieson Mr R Cottam Ms L Carling Mr A Almond Catherine Ashton Phil Ashton Mr J Simms Mrs L Bunn Steve Bennett Victoria Bennet </p>	<p>provision would be impractical.</p>	<p>If there are genuine difficulties in respect of managing a scheme including affordable units then the affordable housing could be provided off-site within the terms set out in the pre-amble.</p>	
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General Public: Rural Options

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Mr A Dean Mr T Barker Mrs S Ashton	All sites should be examined on their merits in respect of their suitability for housing.	Allowing development outside the settlement boundaries defined in the Local Plan would be contrary to the Local Plan. It would not be legitimate for the IHP to conflict with local plan policies.	No change.
Mrs A Holt Mr SA Holt Mr D Holt C E Needham J Cheryl Graham Mr T Barker Mr A Almond Catherine Ashton Mr P Ashton Mr J Simms Mrs L Bunn	Open market housing is needed in the villages, including on sustainable extensions.	It is agreed that some market housing would be needed. This would facilitate some affordable housing. The policy has been recommended for change elsewhere on this issue.	No change.

Mr S Bennet Victoria Bennett			
Karen Wilkinson W Riley	Supports Option A (delivery option)	The delivery option does not take into account the need for development to be sustainable.	No change.
Mrs C Liversidge Malcolm Watson Mr A E Eades Mr A Baker Sherrill Eileen Whalley	Supports Option B (sustainable option).	The sustainable option is unlikely to provide the required numbers of dwellings contained in the RSS.	No change.
Mr W Ingham Mr N Farley	Supports Option C (balanced option)	Position noted.	No change.
Mr B Atkinson	Supports a variation of Option C which includes a review of the Oct 2005 settlement boundaries to identify land which could significantly benefit the continued economic and social welfare of the community.	This is a matter for the LDF not the IHP.	No change.
Harold Butler	Supports Option D (do nothing option)	This option would contradict much government guidance and the RSS. It would ignore the needs of people for decent homes.	No change.
Mr B Atkinson	Considers that the scale of the financial contributions (criteria 7 & 8) together with the provision	This is acknowledged and an amendment, making clear the contributions are subject to	No change.

	of affordable housing could prove to be a serious disincentive to development.	negotiation is recommended elsewhere.	
Mr P Liversidge Mr J Bell Mr T M Murphy Mr J Lyons Mr S J Totty Miss C Sawyer Miss P J Rigg Mr S Howe Mr W J Baxter Mr D Firth Margaret Firth Mrs M Edge Mr T Edge Cllr D R Nichols (Bryning with Warton PC) Cllr P Ursell (Westby PC) Mr P S Harrison R Yeomans Mr D Donaldson Mr K Bennett Mr D Mitchell Mrs A Threlfall Miss C Threlfall Ms H Threlfall E Threlfall	Supports Option E (preferred option)	Support noted.	No change.

Mr J Threlfall Mr D Gosling Miss N Curran Mr J Cartmell Mr B Russell Mr R B Morgan Mrs L Halstead Mr P Ursell			
Mr & Mrs K Bell	Criteria 1 should be deleted from Option E.	Criteria 1 is a fundamental part of the policy since it defines in which settlements development may take place.	No change.
Mr J Hayfield Mr N Hill Mr & Mrs Hayfield Mr K Armistread Mrs B Jennings Mrs L Jackson Mr & Mrs D Bell Mr S Hart Mr M Cannon Mrs P Carling Mr & Mrs K Bell Mr H Carter Mrs K McKearnen Mr & Mrs Butler	Criteria 6 should be deleted from Option E.	It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that housing delivery should be informed by the Strategic Housing market Assessment. A recommendation has previously been made on this issue.	No change.

Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mrs A Simpson Ms L Fenton Mr S Thorley Mr D Simpson Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr C Davenport			
Mr J Hayfield Mr N Hill Mr & Mrs Hayfield Mr & Mrs D Bell Mr S Hart Mr M Cannon Mrs P Carling Mr & Mrs K Bell Mr H Carter	Criteria 7 should be deleted from Option E.	No justification for this comment is provided. Contributions to open space improvements are justified where no on site provision is being made. The principle is already established by Policy TREC 17 in the FBLP	No change.

<p> Mrs K McKearnen Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mrs A Simpson Ms L Fenton Mr S Thorley Mr D Simpson Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr C Davenport </p>		<p>Recommended changes to the policy have been made elsewhere to address this point.</p>	
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Mr R M G Fielding Professor B Winlow	Criteria 8 of Option E should be amended to require Level 6 in the Code For Sustainable Homes.	See below.	No change.
Mr J Hayfield Mr N Hill Mr & Mrs Hayfield Mr & Mrs D Bell Mr S Hart Mr M Cannon Mrs P Carling Mr & Mrs K Bell Mr H Carter Mrs K McKearnen Mr & Mrs Butler Mr G Stephenson Mr P Holden Mr D Kerry Mr A Martin Miss S Crewdson Mrs E Lavender Mr & Mrs J Ashworth Mr A Needham Mrs A Simpson Ms L Fenton Mr S Thorley	Criteria 8 should be deleted from Option E.	It is agreed that at a time when there appears to be a housing recession, the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes would place additional significant financial constraints on the house-building industry. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations. It is considered that now is not the right time to pursue this matter through the planning process.	Amend the policy by deleting criterion 8.

Mr D Simpson Mr M Kellett Mrs Y Rigby Mr J Neary Mrs J Mathieson Mr R Cottam Mrs V Russell Ms L Carling Mr C Davenport			
Mrs S Heaton Mr R Gillet Mrs J Hardy Mr B English Mr S Whittaker Mr & Mrs A Dean Mr I A Butterfield	There should be no affordable homes requirement.	PPS 3: Housing requires local planning authorities to set out its approach to seeking developer contributions to the provision of affordable housing.	No change.
Mr P Mayall Mr S Stansfield Mrs E Ebrey Mr D Jackson Irene & Ian Hart	Sites in villages should not be subject to financial contributions.	There is no evidence to support this view. Housing developments in the rural villages are normally very viable and should be able to make the required	No change.

		contributions. There is a significant need for affordable housing in the rural areas.	
Mark Wells Mr D Graham	Development should be directed to the main settlements where it would be more sustainable.	In the main this is true, most development will be directed to the main urban settlements. However, the villages need to see an amount of new development to provide for rural housing needs and to support local services and facilities including shops and schools.	No change.
Mr D Parrington	No more housing development should be allowed in this over-crowded borough.	This would be completely contrary to the housing requirement in the RSS.	No change.
Mr N Tarris	The rural option should include those settlements excluded from the urban option.	This appears to be a self evident truth.	No change.

Sub-prime Submissions: Urban

<p>Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Mr A Collinge-Pearson Mrs S Sinclair Mr M Sinclair Mr H Nelson Mr D Whiteside Mrs M Williams Mrs H Whiteside Mr R Murray Mr W Dawson Mrs S Brady Mrs J Shorrocks Mr K Dawson Mr R Halstead Mrs P Tozer Mr B Johnson Mr P Low Mr C Chapman M L Dytham</p>	<p>Sustainable urban extensions, including the former LP housing allocations (E.g. Queensway) should be examined / supported by the IHP.</p> <p>Sites should be assessed on an individual basis.</p>	<p>One of the policy objectives is to avoid undermining the purpose and function of the future Local Development Framework.</p> <p>It is the purpose of the Core Strategy and Land Allocation Development Plan Documents to decide if and where urban extensions should be promoted.</p> <p>Allowing development outside the settlement boundaries defined in the Local Plan would be contrary to the Local Plan.</p> <p>Planning applications promoting housing development outside the settlement boundaries would have to be considered having regard to the development plan and other material considerations</p>	<p>No change.</p>
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Mrs C H Murray Miss M Threlfall Mrs A Ball Mr J Williams Mr D Finegan Mrs S Evans Mr D Graham Mr G Warburton Mr M Beardsworth Mr S Yeadon Mr P Collinge- Pearson Mrs A Stobbart Mr J Stobbart Mr R Anstead Lisa Shields Mr R Johnson Mrs J S Spencer Thompson Developments Mr D Harper Mr J Heaton Miss L Hobbs Dr C J Shorrock Mrs L D Samuels Mr L D Samuels Caroline Marchbank-Caunce Miss J Ashcroft Mr M Varley			
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C M Wells MPSL Planning & Design Ltd M/c			
Mr A Blackledge Mr MG Teale Mrs E Evans Mrs S Sinclair Mr M Sinclair Mr N Marsh Miss R Marsh Mrs H Nelson Mr J Whiteside Mr M Evans Mr A Brady Mr P Tozer Mr A. R. Quigley Mr R Flickcroft Mr D Hill Mr S Bottomley Mr H Feeney Mr M Rowley Mrs M Rowley R F Attwater Mrs S Lovatt Miss S Connelly Mr S Johnson Mr P Priestly Mr G Spence Mr S Halwood	The Queensway housing development should be supported in particular to ensure the funding of the M55 link road and other infrastructure.	See above. The planning application for residential development at Queensway will be determined on the basis of the development plan and other material considerations. For the reasons stated above it is not legitimate for the IHP to overrule the statutory Local Plan.	No change.

Mr J Cheetham Mr A Brown Mrs S Robinson Mr P Gill Mr S Kilmartin Mr M Bishop Mrs M Attwatwer Mrs J M Arden Bridget Hudson Mrs S Lovatt A Jackson Heather Shepherd Mr T Evans Mr K Blackburn Mrs M Croston Mr E Shakleton Alan Kirkham Mrs L B McKinnon - Gillies			
Mr B Ball Mr S Cross Mr A Beirne Mrs J Beirne Michelle Totty A M Downing Plant Hire Clive Sweet Plant Hire	The link road across the Moss is needed urgently. This should be paid for by developers of new sites including Queensway.	Where the Council is minded to grant planning permission for developments which would result in significantly increased traffic on the Moss Road, contributions will be sought from developers, irrespective of whether the developments fall within the scope of the IHP or	No change.

Mrs G Totty Mr J Thompson Mr T Croston Mr S Brierley Mr D Johnson		not.	
Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Hays Recruitment (Preston) G Hamilton	Suggests Option E with criteria 2 deleted (application site not designated for other purposes in the Local Plan)	Allowing housing development on sites protected for other land use purposes in the Local Plan would self evidently be contrary to the Local Plan.	No change.

Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr S Speight Mr & Mrs E Regan Mrs M Simmonds			
Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin	Suggests Option E with criteria 4 deleted	This is agreed. In response to a representation from Blackpool Council, it is recommended that criterion 4 is deleted.	No change.

Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Hays Recruitment (Preston) G Hamilton Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr S Speight Mr & Mrs E Regan Mrs M Simmonds			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Ms K Williams Mrs B GreenMr J	Suggests Option E with criteria 6 deleted (mix of housing types and sizes).	It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that	No change.

Horrobin Mr S Geraghty Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Mr & Mrs G Kemp Hays Recruitment (Preston)		housing delivery should be informed by the Strategic Housing market Assessment. A recommendation has previously been made on this issue.	
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G Hamilton Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr C Kellett Mr C Nichols Mr M Potter Mr B Mc Dowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott			
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Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Ms K Williams Mrs B GreenMr J	Suggests Option E with criteria 7 deleted (Code for Sustainable Homes)	It is agreed that at a time when there appears to be a housing recession, the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes would place additional	No change.

Horrobin Mr S Geraghty Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Hays Recruitment (Preston) G Hamilton		<p>significant financial constraints on the house-building industry. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations. It is considered that now is not the right time to pursue this matter through the planning process.</p> <p>A recommendation has previously been made on this issue.</p>	
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Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr C Kellett Mr C Nichols Mr M Potter Mr B Mc Dowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall			
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Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Mrs J Hitchin Mr & Mrs C Pit Mr C Sutcliffe	Suggests Option E with criteria 8 deleted (No affordable housing contribution on schemes less than 15/16/17 units.	Agreed. A recommendation has previously been made on this issue.	No change.

Mr J Adams Ms K Williams Mrs B GreenMr J Horrobin Mr S Geraghty Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty			
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Kristen Durose Mr Williams Mr R Lancaster Hays Recruitment (Preston) G Hamilton Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr C Kellett Mr C Nichols Mr M Potter Mr B Mc Dowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Mrs A Rigby Mr A Rigby Mrs D Rigby			
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Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds Chris Carter Tracy Elson			
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Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Ms K Williams Mrs B GreenMr J Horrobin Mr S Geraghty Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr R Flitcroft Mr A Jones Mr D Thomas Mr R Cooper Mr L Tipton Mr R Barlow Mrs B Berry Mr S Cunliffe	New criteria 9 with minimum threshold at 15 units.	Suggests Option E with criteria 10 deleted	It is important that where new housing is developed, the developer makes an appropriate contribution towards essential community infrastructure.	No change.

Mr A Kenway Mr W Murphy Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Hays Recruitment (Preston) G Hamilton Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer				
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Mr C Kellett Mr C Nichols Mr M Potter Mr B Mc Dowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves				
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Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds				
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Ms K Williams Mrs B GreenMr J Horrobin Mr S Geraghty Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson	New criteria 9: 20% (max) affordable housing requirement.	It is considered that a figure of 20% would be too low. Evidence suggests that up to a 40% or higher element of affordable housing could be achieved in most circumstances. Studies have confirmed the need to provide a high level of affordable housing.	No change.	

Mrs B Mercer Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Hays Recruitment (Preston) G Hamilton Lee Rawstron Mr & Mrs M Walsh Mr N Roocroft L Gardner Mrs C Unsworth Mrs S Mc Namara Mrs P Parkinson Mr M Bridge Mr G Hollings Mr B Coomer Mr C Kellett			
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Mr C Nichols Mr M Potter Mr B Mc Dowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik			
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Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds			
Mr A Bradley Mr R Hawes Mr S Clough Miss L Sheriden Mr I Kilciannon Mr P Maycock Mr D H Ellis Mr N Roberts R Casley Mr T Lord Mr A Mellor Miss M Michalik Ernest Carling Mr G Harper Mr H Fox Mr C Marfleet Mrs J Whitby Mr C Peacock	There should be no affordable homes requirement at all.	PPS 3: Housing requires local planning authorities to set out its approach to seeking developer contributions to the provision of affordable housing.	No change.

Mr G M Coy			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Mrs J Hitchin Mr & Mrs C Pit Mr C Sutcliffe Mr J Adams Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr T Balwin Mr & Mrs D Barker Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin	Suggests Option E with criteria 10 deleted (2.5% contribution for public realm improvements)	It is important that where new housing is developed, the developer makes an appropriate contribution towards essential community infrastructure.	No change.

Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Mr Williams Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu			
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Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds Chris Carter Tracy Elson			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Mrs J Hitchin Mr & Mrs C Pit Mr C Sutcliffe Mr J Adams Miss T Harrison Mr S Hagen Mr F Connolley Mr S Powell Mr S A Aitken Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mr T Balwin Mr & Mrs D Barker	Suggests Option E with criteria 10 deleted	It is important that where new housing is developed, the developer makes an appropriate contribution towards essential community infrastructure.	No change.

Mr P Bates Mr G Winchster Mr L Woodley Mr P Nuttall Mrs S Monaghan Mr S Norwood Mr S Hayter Mrs G Wilkin Mr J Heap Mr & Mrs Ashworth Mrs M Stock Mr T Adams Mr P Geraghty Mr Williams Mrs A Rigby Mr A Rigby Mrs D Rigby Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back			
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Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Regan Mrs M Simmonds Chris Carter Tracy Elson			
Mr E Gray Jane Pearson Sean Pearson Cath Dougherty Mr C Lesniak Mr D Lord Mr C Ashworth Mrs P Simpson Mrs B Mercer Mrs A Rigby Mr A Rigby Mrs D Rigby	A new policy should be included specifying that affordable housing should not be sought on developments of sheltered housing since this would be impractical.	No justification for this comment is provided. Sheltered housing is just one type of market housing. If there are genuine difficulties in respect of managing a scheme including affordable units then the affordable housing could be provided off-site within the terms set out in the pre-amble.	No change.

Mr D Rigby Mr N Stein Caroline Stein Martyn Coyne Mark Scott Andrew Wall Helen Wall Mrs P M Simms Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Jolanta Malec Mr & Mrs Hargreaves Ms Kinga Michalik Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown			
Mr A C Downes	Cannot afford a house in Fylde. Should not impose any more restrictions on house building.	Comment noted.	No change.

Sub-prime Submissions: Urban

Respondent	Main Submissions	Council's Response	Recommended Changes to Policy
Mr R Murray Mrs C H Murray Mr P Low Mr L Dytham Mr P Gill R F Attwater Dr C J Shorrock	All sites should be examined on their merits in respect of their suitability for housing.	Allowing development outside the settlement boundaries defined in the Local Plan would be contrary to the Local Plan. It would not be legitimate for the IHP to conflict with local plan policies.	No change.
Eric Gray Jane Pearson Sean Pearson Cath Dougherty Mrs A Rigby Mr A Rigby Mr D Rigby Mr D Rigby Caroline Stein Martyn Coyne Mark Scott Andrew Wall	Open market housing is needed in the villages, including on sustainable extensions.	It is agreed that some market housing would be needed. This would facilitate some affordable housing. The policy has been recommended for change elsewhere on this issue.	No change.

Helen Wall Mrs P M Simms			
Michael Varley Mrs S Williams Mr B Johnson Mr J Whiteside	Supports Option A (delivery option)	The delivery option does not take into account the need for development to be sustainable.	No change.
Mr T Evans Mr K Blackburn Mr D Whiteside Miss M Threlfall MPSL Planning & Design Mr A Brown Miss C Connelly	Supports Option B (sustainable option).	The sustainable option is unlikely to provide the required numbers of dwellings contained in the RSS.	No change.
Mrs H Whiteside Mr J Williams Everglade Nurseries (Southport)	Supports Option C (balanced option)	Position noted.	No change.
Mrs A Stobbart Miss J Ashcroft	Supports Option D (Do Nothing Option)	This option would contradict much government guidance and the RSS. It would ignore the needs of people for decent homes.	No change.
Richard Anstead Lisa Shields Michelle Totty Richard Johnson Mrs J S Spencer Thompson	Supports Option E (preferred option)	Support noted.	No change.

Developments Downing Plant Hire Alan Blackledge Teale Haulage and Plant Hire Alan Kirkham Simon Brierley Mr D Johnson Mrs L B McKinnon – Gillies CMW Land Surveys Ltd Edwin Shackleton Mr G Totty Bridget Hudson James Heaton Mr A C Downes Heather Shepherd A Jackson Miss L Hobbs J L T Developments Ltd Mrs L D Samuels Mr L D Samuels Mrs M Croston Mr T Croston Mr A Collinge – Pearson Mr P Collinge- Pearson			
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Mrs S Sinclair Mr M Sinclair Mrs H Nelson Mr H Nelson Miss R Marsh Mr N Marsh Mr W Dawson Mrs S Brady Mrs J Shorrock Mr R Halstead Mrs P Tozer Mr C Chapman Mrs A Ball Mr D Finegan Mrs S Evans Mr D Graham Mr D Warburton Mr B Ball Mr S Cross Mr A Beirne Mrs J Beirne Mr M Evans Mr A Brady Mr P Tozer Mr A R Quigley Mr R Flickcroft Stewart Yeadon Mr S Lovatt Mrs S Lovatt Mr J M Ardern			
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Mr M Bishop Stephen Kilmartin Mrs S Robinson Mr J Cheetam Mr G Spencer Mr P Priestley Mr S Johnson Harry Feeney Toyota Mr S Bottomley David Hill			
Mr C Kellett Mr C Nichols Mr M Potter Mr B McDowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Kinga Michalik Mr & Mrs Hargreaves Ms Jolanta Malec	Criteria 6 should be deleted from Option E.	It is agreed that in certain circumstances e.g. development of a block of flats, a mix of housing types would not be possible. However, it is the government's intention that housing delivery should be informed by the Strategic Housing market Assessment. A recommendation has previously been made on this issue.	No change.

Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Reagan Mrs M Simmonds Hays Recruitment Mr B Coomer Mr G Hollings Mr M Bridge Mrs P Parkinson Mrs S McNamara Mrs Charlotte Unsworth L Gardner Neil Roocroft Mr & Mrs M Walsh Lee Rawstron G Hamilton Miss T Harrison Mr S Hagan Mr F Connolley Mr S Powell Mr S A Aiken Ms K Williams			
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Mrs B Green Mr J Horrobin Mr S Geraghty Mr & Mrs G Kemp Mr P Geraghty Mr T Adams Mrs M Stock Mr & Mrs Ashworth Mr J Heap Mrs G Wilkin Mr S Hayter Mr S Norwood Mrs S Monaghan Mr P Nuttall Mr L Woodley Mr G Winchester Mr P Bates Mr & Mrs D Barker Mr T Baldwin Mrs B Mercer Mrs P Simpson Mrs C Ahworth Mr D Lord Mr C Lesniak			
Mr C Kellett Mr C Nichols Mr M Potter Mr B McDowell	Criteria 7 should be deleted from Option E.	No justification for this comment is provided. Contributions to open space	No change.

<p>Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Kinga Michalik Mr & Mrs Hargreaves Ms Jolanta Malec Mr C Slinger Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Reagan Mrs M Simmonds Hays Recruitment Mr B Coomer Mr G Hollings Mr M Bridge</p>		<p>improvements are justified where no on site provision is being made. The principle is already established by Policy TREC 17 in the FBLP</p> <p>Recommended changes to the policy have been made elsewhere to address this point.</p>	
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Mrs P Parkinson Mrs S McNamara Mrs Charlotte Unsworth L Gardner Neil Roocroft Mr & Mrs M Walsh Lee Rawstron G Hamilton Miss T Harrison Mr S Hagan Mr F Connolley Mr S Powell Mr S A Aiken Ms K Williams Mrs B Green Mr J Horrobin Mr S Geraghty Mr & Mrs G Kemp Mr P Geraghty Mr T Adams Mrs M Stock Mr & Mrs Ashworth Mr J Heap Mrs G Wilkin Mr S Hayter Mr S Norwood Mrs S Monaghan Mr P Nuttall Mr L Woodley			
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Mr G Winchester Mr P Bates Mr & Mrs D Barker Mr T Baldwin Mrs B Mercer Mrs P Simpson Mrs C Ahworth Mr D Lord Mr C Lesniak			
Mr C Kellett Mr C Nichols Mr M Potter Mr B McDowell Mr D Firth Lacy Goodall Mr R Hindle Mr M Davies Mr M Oddy Mr S Thropp Mr V Tinsley Carol Highton Mrs A Parsons Mrs J Pitt Mr A Virco Mr & Mrs A Back Ms Kinga Michalik Mr & Mrs Hargreaves Ms Jolanta Malec Mr C Slinger	Criteria 8 should be deleted from Option E.	It is agreed that at a time when there appears to be a housing recession, the requirement for new dwellings to meet level 3 of the Code for Sustainable Homes would place additional significant financial constraints on the house-building industry. There are current government proposals to introduce the requirements of the Code for Sustainable Homes through the Building Regulations. It is considered that now is not the right time to pursue this matter through the planning process. A recommendation to this effect is made elsewhere in	No change.

Mr G Tomkins Ms P Adams Ms K Okododudu Tom Strangeway Ms C Wilson Mr M Wall Martin Brown Mr S Speight Mr & Mrs E Reagan Mrs M Simmonds Hays Recruitment Mr B Coomer Mr G Hollings Mr M Bridge Mrs P Parkinson Mrs S McNamara Mrs Charlotte Unsworth L Gardner Neil Roocroft Mr & Mrs M Walsh Lee Rawstron G Hamilton Miss T Harrison Mr S Hagan Mr F Connolley Mr S Powell Mr S A Aiken Ms K Williams Mrs B Green		the document	
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Mr J Horrobin Mr S Geraghty Mr & Mrs G Kemp Mr P Geraghty Mr T Adams Mrs M Stock Mr & Mrs Ashworth Mr J Heap Mrs G Wilkin Mr S Hayter Mr S Norwood Mrs S Monaghan Mr P Nuttall Mr L Woodley Mr G Winchester Mr P Bates Mr & Mrs D Barker Mr T Baldwin Mrs B Mercer Mrs P Simpson Mrs C Ahworth Mr D Lord Mr C Lesniak			
Mr P Maycock Mr I Kilciannon Miss Lynn Sheridan Mr S Clough	There should be no affordable homes requirement.	PPS 3: Housing requires local planning authorities to set out its approach to seeking developer contributions to the	No change.

Mr R Hawes Mr A Bradley Mr D H Ellis Miss M Michalik Mr A Mellor Mr Tim Lord Mr G Harper Mr H Fox Mr C Marfleet Mrs J Whitby Mr C Peacock Mr N Roberts Mr G Mc Coy		provision of affordable housing.	
Mr C Sutcliffe Mr J Adams Mr D Thomar Mr R Barlow Mr Williams Chris Carter Mr & Mrs C Pitt Mrs B Berry Mr S Cunliffe Mr W Murphy Mr A Kenway Mr L Tipton Mr R Cooper Mr A Jones Mr R Flitcroft Ms Jean Hitchin	There should be no contributions at all in respect of sites in villages.	There is no evidence to support this view. Housing developments in the rural villages are normally very viable and should be able to make the required contributions. There is a significant need for affordable housing in the rural areas.	No change.

R Casely Kristen Durose Tracy Elson Ronnie Lancaster Ernest Carling			
David Harper	Development should be directed to the main settlements where it would be more sustainable.	In the main this is true, most development will be directed to the main urban settlements. However, the villages need to see an amount of new development to provide for rural housing needs and to support local services and facilities including shops and schools.	No change.
Caroline Marchbank - Counce	The rural option should include those settlements excluded from the urban option.	This appears to be a self evident truth.	No change.

REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING & DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	5 TH JUNE 2008	7

PLANNING OBLIGATIONS

Public item

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

Summary

The report provides information on the issues surrounding the operation of planning obligations.

Recommendation

That the issues in the report are noted and that the Committee recommends to the Portfolio Holder:

1. the nature of any further work to be carried out having regard to the background information and options presented in the report, and if further work is recommended;
2. how the necessary resources can be made available to facilitate the work; and
3. the changes required (including the priority to be given to document preparation) to the Local Development Scheme

Cabinet Portfolio

The item falls within the following Cabinet portfolio:

Development and Regeneration: Councillor Roger Small

Report

1. Previous decisions

- 1.1. The Committee considered a report at its February 2007 meeting entitled 'Planning Obligations in Lancashire'. It included a policy paper prepared by the Lancashire Planning Officers Society on behalf of Lancashire County Council and other Lancashire Authorities. Members felt however that the extent and content of the document was overly focussed on County Council obligations at the expense of

district council priorities. As a result members chose not to recommend adoption and simply noted the report.

2. Why is this issue now being re-considered?

- 2.1. The council has recently adopted a 'Small Sites Exemption policy' covering small scale residential applications of 9 houses or less which is being used as the basis for determining such applications. The policy includes a percentage contribution for affordable housing of 5% and for public open space of 2½%. Each approval is the subject of a Section 106 Agreement to secure these contributions. . As a result there has been a number of such applications which when completed will require payment of the relevant sums. As this money is received there will be the inevitable requests for monies towards particular projects. At the moment the agreements specify the money going towards relevant local projects which are negotiated with the developer.
- 2.2. In addition members have recently agreed an action plan for improving performance in Development Control arising from the report by the Planning Advisory Service. One particular action is the production of a Supplementary Planning Document (SPD) on planning obligations.
- 2.3. The Interim Housing Policy being considered by members is likely to confirm the arrangements for financial contributions to be made in respect of housing applications and will when adopted see an increase in residential development and resultant planning obligations. It is therefore important the council's approach to securing planning obligations is reviewed.

3. What are planning obligations and the legal framework?

- 3.1. Planning applications are each considered on their own merits based on whether the application accords with the relevant development plan, unless material considerations indicate otherwise. Where applications do not meet these requirements, they may be refused. However in some instances, it may be possible to make acceptable development proposals which might otherwise be unacceptable through the use of planning conditions or where this is not possible, through planning obligations. Planning obligations are legal agreements negotiated under Section 106 of the Town and Country Planning Act 1990 that seek to ensure the potentially harmful impacts of new developments are fully mitigated. Developers/people with an interest in the land are required to either provide or fund the necessary improvements. Government guidance requires that planning obligations be only sought where they meet all of the following five tests.
- 3.2. A planning obligation must be:
 - (i) relevant to planning;
 - (ii) necessary to make the proposed development acceptable in planning terms;
 - (iii) directly related to the proposed development;
 - (iv) fairly and reasonably related in scale and kind to the proposed development; and
 - (v) reasonable in all other respects.
- 3.3. The use of planning obligations is based on the fundamental principle that planning permission may not be bought or sold. It is therefore not legitimate for unacceptable development to be permitted because of benefits or inducements offered by a

developer which are not necessary to make the development acceptable in planning terms.

- 3.4. In order to allow developers to predict the likely level of contributions they will be asked to make, local authorities should try and include as much information as possible in their published documents in the Local Development Framework. This should include in Development Plan Documents (DPD's) general policies about the principles and use of planning obligations. More detailed policies applying the principles set out in the DPD (e.g. application to specific localities and likely amount of contributions) ought then to be included in a Supplementary Planning Document (SPD).
- 3.5. Planning obligation policies should be in line with Circular 05/2005 and should cover both allocated and windfall sites. Where mitigation or compensation measures are required, planning obligations policies should be based on a clear and up to date assessment of the impacts likely to be created by development and the nature and scale of the measures needed to address these impacts. Local authorities can use standard charges and formulae to inform developers of likely contributions to the provision of infrastructure, but these must be evidence based and should be published in advance in a public document.

4. Current situation

- 4.1. The payment of a planning obligation or commuted sum is mentioned in TREC 17 (public open space within new housing developments) where the standards would require the provision of an open space of less than 0.2 Ha or where for other reasons it is agreed between the developer and the council that the payment of a commuted sum would be better provided off-site. This can include the improvement of an existing open space if the benefits would serve the new development.
- 4.2. Negotiation is on a site-by-site basis and is informed by existing plans, strategies and research. These include:
 - Parks and Open Spaces strategy 2003-07
 - Sports Pitch strategy 2004
 - Play Strategy 2007-12
- 4.3. As part of the evidence gathering for the production of the Core Strategy the council has commissioned the production of an open space, sport and recreation study (strategy and action plan). The draft study that will be presented to members in due course highlights key issues emerging from a detailed assessment of the quality and distribution of provision. The Strategy and Action Plan sets out a vision over the next ten years for the Borough Council and its partners in relation to the provision and improvement of open space provision within Fylde and will help guide negotiations with developers.
- 4.4. Affordable housing need is identified in the following studies:
 - Housing Needs Study 2008 (Fordham)
 - Fylde Coast Strategic Housing Market Assessment 2007 (DTZ)

5. Interim Housing Policy (IHP)

- 5.1. In the next few weeks it is likely that the Council will have adopted the Interim Housing Policy. The IHP will prescribe the amount, extent and tenure of the affordable housing to be provided. This will also include contributions for public

open space and public realm works. However in the larger developments public open space is more likely to be provided on site.

6. Community Infrastructure Levy (CIL)

- 6.1. The Government has included within the Planning Bill for the new Community Infrastructure Levy (CIL). The Bill allows for regulations to empower local councils to apply a Community Infrastructure Levy on new developments in their area to support infrastructure delivery. The CIL forms part of a wider package of funding for infrastructure to support housing and economic growth. CIL cannot be expected to pay for all infrastructure required, but it is expected to make a significant contribution. The overall purpose of the CIL is to ensure that development contributes fairly to the mitigation of the impact it creates: to ensure that development is delivered, and in a more sustainable way.
- 6.2. The Government has said it will be an enabling regulation that will empower local planning authorities rather than require. Where applied the CIL will be a standard charge decided by designated charging authorities and levied by them on new development. The Government has said however that CIL should not be used for general local authority expenditure, or to remedy pre-existing deficiencies in infrastructure provision, unless these have been, or will in time be, aggravated by new development.
- 6.3. Draft PPS 12 stresses the importance of infrastructure planning to underpin the preparation of the Core Strategy of the Local Development Framework, and the need for the infrastructure planning process to identify infrastructure needs and costs, funding sources and who will be responsible for delivery.
- 6.4. Much more detail is yet to be published by the Government on the proposed CIL. The Government recommends though that local authorities should continue to gather evidence of infrastructure needs and priorities in line with draft PPS 12. The principle of planning obligations would nevertheless continue in the future based on a mitigation of more site-specific impacts. Whilst the CIL would look more widely at strategic infrastructure needs such as transport.

7. Current issues

- 7.1. There are several issues that have arisen with the increase in planning obligations:
 - The methodology for agreeing contributions from housing developers where this is not defined in percentage payments
 - Determining how and where contributions are actually spent
 - Whether planning obligations should be extended to non-housing applications,

No work is currently planned to address any of these issues.

8. Options

- 8.1. There are a number of options, which could be pursued:
 1. Do nothing until the details of the Community Infrastructure Levy are known
 2. Prepare work in anticipation of the CIL
 3. Prepare relevant Development Plan Document (DPD) and Supplementary Planning Documents (SPD) (Stages 3 and 4 are not exclusive and may overlap)
 4. Prepare an informal document identifying priority schemes/projects for investment

- 8.2. The Government recommends that local planning authorities should be identifying their own future infrastructure needs as part of work on the Local Development Framework. Therefore option 1 is not recommended. The details of the CIL will be in relation to how it is gathered, spent and administered. Local infrastructure needs will be for local authorities to determine irrespective of funding mechanisms.
- 8.3. The preparation of a parent DPD to set the principle of planning obligations together with a specific SPD setting out the amount and details of likely contributions is an extensive undertaking. Proper policies for the approach and application of planning obligations are much preferable to a site by site approach, which is both more time consuming and lacks transparency and clarity. However if members did wish to see such plans produced this would require proper resourcing. Currently work on the Core Strategy has fallen behind schedule due to extra work on the Interim Housing Policy and that also no additional budget is available for further evidence gathering and analysis in 2008/09. If members wished to see the preparation of a DPD/SPD, these would need to be included in a revised Local Development Scheme agreed with Government Office. In the meantime your officers have gathered several SPD's prepared by other local authorities which are available to look at.
- 8.4. Any informal document prepared outside the LDF will have very little weight in the case of challenge and on this basis option 4 above is not recommended.
- 8.5. One possibility which has recently emerged is the undertaking of joint work across the three Fylde Coast authorities to produce formal planning policy on planning obligations similar to the work recently completed on residential extensions. The benefits would be a sharing of sub-regional intelligence, consistency of approach and possible delivery of cross border infrastructure projects. Officers are investigating this possibility and will report back to members in due course.

9. Conclusions:

- 9.1. Until a more strategic plan for planning obligations is in place each application will need to be considered on its own merit. Where a percentage contribution is achieved relevant projects will continue to be identified by professional officers using the available data and other relevant considerations to ensure the impacts of new developments are best mitigated.
- 9.2. In the near future members will receive the draft open space assessment mentioned earlier for consideration. This will inevitably further guide local investment decisions including the identification of projects to be funded by planning obligations.
- 9.3. Affordable housing projects on the other hand will continue to be worked up through the RSL Partnership and bids sought for most relevant and worthy schemes to come forward.
- 9.4. Any council investment decisions arising from planning obligations will be made through the Council's delegated decision-making protocols (e.g. Council, Cabinet, Portfolio Holders or Officers).

Implications	
Finance	There is significant potential to bring in additional investment to the borough as part planning obligations however the work required to bring this forward is considerable and is not reflected in current budgets and work plans. Should members wish to consider this more formal approach then a further report will be necessary identifying the full financial implications.
Legal	The in compiling an SPD on Planning Obligations officers will need to seek appropriate Legal input. The process to be followed is a formal one which needs to be properly adhered to if the outcome is to be safe from legal challenge.
Community Safety	No direct implications
Human Rights and Equalities	No direct implications
Sustainability	Provision of appropriate infrastructure can make development more sustainable.
Health & Safety and Risk Management	No direct implications

Report Author	Tel	Date	Doc ID
Paul Walker	(01253) 658431	23 rd May 2008	

List of Background Papers		
Name of document	Date	Where available for inspection
Government guidance on planning obligations - ODPM Circular 05/2005	July 2005	http://www.communities.gov.uk/publications/planningandbuilding/circularplanningobligations
Community Infrastructure Levy	January 2008	http://www.communities.gov.uk/publications/planningandbuilding/infrastructurelevyguidance
Planning Obligations in Lancashire	June 2006	http://www.lancashire.gov.uk/environment/planob/index.asp#wind
Southwark Council SPD on Section 106 planning obligations	July 2007	http://www.southwark.gov.uk/Uploads/FILE_29686.pdf
Haringey Council The Negotiation, Management and Monitoring of Planning Obligations SPG	2006	http://www.haringey.gov.uk/spg10a_-_the_negotiation_management_and_monitoring_of_planning_obligations_.pdf

REPORT



REPORT OF	MEETING	DATE	ITEM NO
STRATEGIC PLANNING & DEVELOPMENT	PLANNING POLICY SCRUTINY COMMITTEE	5 TH JUNE 2008	8

THE ISLAND – SEAFRONT MASTERPLAN

Public item

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

Summary

Report to follow.

Cabinet Portfolio

The item falls within the following Cabinet portfolio:

Development and Regeneration: Councillor Roger Small

Planning Policy Scrutiny Committee



Date	10 April 2008
Venue	Lowther Pavilion , Lytham
Committee members	Councillor John Bennett (Chairman) Councillor William Thompson (Vice-Chairman) Ben Aitken, Maxine Chew, Kevin Eastham, Trevor Fiddler, Lyndsay Greening, Elizabeth Oades
Other Councillors	Fabian Craig-Wilson
Officers	Ian Curtis, Paul Walker, Tony Donnelly, Lyndsey Lacey
Members of the Public	Peter Liversidge, Fred Moor, Barbara Moor

1. Declarations of interest

Members were reminded that any personal/prejudicial interests should be declared as required by the Council's Code of Conduct adopted in accordance with the Local Government Act 2000.

2. Confirmation of minutes

RESOLVED: To approve the minutes of the Planning Policy Scrutiny Committee meeting held on 21 February 2008 as a correct record for signature by the chairman.

3. Substitute members

The following substitutions were reported under council procedure rule 22.3:

Councillor Kevin Eastham for Councillor Michael Cornah

Councillor Elizabeth Oades for Councillor Keith Beckett

4. Exclusion of the public

It was RESOLVED to exclude the public from the meeting for part of the consideration of item 5 in accordance with paragraph 5 of the provisions of Section 100A (4) of the Local Government Act 1972.

5. Consultation on Interim Housing Policy

Tony Donnelly (Head of Planning (Policy)) provided the committee with an overview of recent experiences with regard to the public consultation exercise undertaken regarding the proposed interim housing policy. Details with respect to this matter were set out in the report.

The Committee RESOLVED to recommend to Cabinet that when considering the consultation responses, the committee be provided with available information on the veracity of each response and give each response appropriate weight accordingly.

6. Draft North West Regional Spatial Strategy

The Scrutiny Committee was asked to consider the content of the Secretary of State for Communities Proposed Changes to the draft North West Regional Spatial Strategy (RSS) for the North West of England.

Tony Donnelly (Head of Planning (Policy)) presented the report and in doing so, he made reference to the fact that the Secretary of State had now considered an Independent Panel report following a public examination (at which FBC officers participated) and had published proposed changes to the draft Strategy for further consultation. The consultation would last until 23 May 2008.

The report highlighted the Secretary of State's decisions on each of the Panel's recommendations and the reasons for those decisions. The report also set out the full text of the revised Draft Regional Spatial Strategy incorporating all the Proposed Changes and the reasons for them.

It was reported that the Secretary of State had proposed that the structure of RSS remained unchanged, but that further maps and diagrams should be included as appropriate. An index of chapters and policies in modified RSS was included in an appendix attached to the report. The general approach to the Secretary of State's proposed changes had been to accept as many as possible of the Panel report's recommendations, with some minor modifications. Selected policies with a specific or direct relevance to Fylde Borough had been highlighted for comment in the report.

Members commented upon paragraph 22 which suggested that development in the Central Lancashire City Region should be located in Preston, Blackburn, Blackpool and Burley and for this purpose; Blackpool was part of an urban area that included Fleetwood, Thornton, Cleveleys and Lytham St Annes. There was a general view that Lytham St Annes should not be linked to Blackpool as both towns were distinctly dissimilar.

It was also suggested by members that they would like to see Lytham St Annes identified as a Key Service Area.

Councillor Fiddler expressed his surprise that the Regional Town Planning Group had not been involved in this process.

Councillor Thompson sought clarification on paragraphs 11 and 18 of the report. Mr Donnelley addressed both matters.

Councillor Oades sought advice on paragraph 13 of the report which sought to remove the ceiling to housing figures. She enquired what effect that this would have on Fylde. Mr Donnelly responded and explained that whereas in the current RSS the housing figures were expressed as maximum figures (i.e. Councils should not exceed them), the draft RSS did not express the figures as maxima. This gave the Council the discretion to exceed the figures if they so wished. Likewise in appeal situations, it would also give the Secretary of State and Inspectors the discretion to exceed the figures.

Councillor Fiddler suggested that it would be timely for the committee to consider a review of the conclusions Employment Land Impact study (Grimley Report)

Following a lengthy and detailed discussion the Committee RESOLVED:

1. To note the content of the report including the initial observations of officers.
2. To request the Executive Manager, Strategic Planning and Development, to meet with senior officers from Blackpool and Wyre councils to identify the shared concerns of the three authorities based on the initial observations of officers contained in the report and the additional observations of the committee as detailed below:

Key Service Centres

- Would like clarification on the issue of whether Lytham St Annes could be designated as a named Key Service Centre in view of its linkage to the definition of a wider 'Blackpool'. The draft RSS was not clear on this significant issue. The Committee opposed the concept of subsuming Lytham St Annes within the definition of a wider Blackpool.
3. To authorise the preparation of a combined response of the three authorities where there were common views, and their submission to Government Office North West.
 4. To include a review of the Employment Land Study (Grimley report) for consideration at a future meeting of the committee.

7. Caravans- various issues

Tony Donnelly (Head of Planning (Policy)) presented an updated report on the current issues around the use of caravans as permanent living accommodation.

The report made reference to previous reports on the subject, matters appertaining to licensing and council tax issues and information on the Good Practice Guide on Planning for Tourism report (July 2007). Details of a recent informal joint meeting of members and officers was also set out in the report.

Mr Donnelly indicated that new information had become available from the recent housing stock condition survey. He explained that the survey also looked at caravan sites and of the 24 sites in Fylde, 11 (46%) had been assessed as being used to some degree for residential purposes.

Councillor Chew enquired whether or not the situation could be managed by the site licence. Mr Donnelly explained the position.

Following a detailed debate on the matter the Committee RESOLVED:

1. To endorse the following recommendations of the informal meeting of members and officers that took place on 20 March:

- To ask officers to consult with other Lancashire authorities to ascertain whether they had identified similar issues, and if so, how they were dealing with the matters.
- To arrange for one to one meetings with site owners to be undertaken to discuss relevant issues, particularly when planning applications are submitted to extend the season;
- To undertake enforcement action should in respect of sites where there was evidence that planning conditions are being breached; and
- To ask Environmental Health officers to research whether there was a means whereby site owners could be charged for enforcement proceedings.

2. To ask the Executive Manager, Strategic Planning and Development, to write to the Member of Parliament for Fylde and the Local Government Association in an attempt to raise an awareness of the problems in Fylde and beyond and seek their support for the introduction of a suitable static and touring caravan policy.

3. To ask the Executive Manager, Strategic Planning and Development, to produce an options report for consideration at the next appropriate meeting detailing all the issues to be considered in preparing a suitable Policy.

4. That in connection with 3 above, an invitation be sent to representatives of the Valuation Office and the licensing, tourism and rating sections of the council to attend the meeting and brief members on issues appertaining to their areas of responsibility.

5. In the interim, to ask the Executive Manager, Strategic Planning and Development, to obtain evidence substantiating the need for static touring caravan sites in the borough.

8. Housing Needs and Demand Study

Tony Donnelly (Head of Planning (Policy)) presented on the 2007 update of the Housing Needs and Demand Study which had been undertaken by Fordham Research.

The main conclusions of the final report were set out on the agenda. It provided a robust estimate of the need for affordable housing in the context of changes that had occurred since the time of the first survey.

The Committee RESOLVED:

1. To ask to the Portfolio Holder to adopt the survey for Development Control purposes.

2. To ask the Executive Manager (Consumer Well being and Protection) to arrange for an analysis of the current housing waiting list to identify the proportions of those applicants who currently live within the borough, and those that live outside the borough.

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