

Agenda

Executive Committee

Date:	Tuesday, 17 October 2023 at 6:30 pm
Venue:	Town Hall, St Annes, FY8 1LW
Committee members:	<p>Councillor Karen Buckley (Chairman) Councillor Richard Redcliffe (Vice-Chairman)</p> <p>Councillors Tim Armit, Peter Collins, Chris Dixon, Ellie Gaunt, Karen Henshaw JP, Matthew Lee, Michelle Morris, Ed Nash, Jayne Nixon, Tommy Threlfall.</p>

Public Platform

To hear representations from members of the public in accordance with Article 15 of the Constitution.

To register to speak under Public Platform: see [Public Speaking at Council Meetings](#).

	PROCEDURAL ITEMS:	PAGE
1	Declarations of Interest: Declarations of interest, and the responsibility for declaring the same, are matters for elected members. Members are able to obtain advice, in writing, in advance of meetings. This should only be sought via the Council's Monitoring Officer. However, it should be noted that no advice on interests sought less than one working day prior to any meeting will be provided.	1
2	Substitute Members: Details of any substitute members notified in accordance with council procedure rule 23(c).	1
3	Confirmation of Minutes: To confirm the minutes, as previously circulated, of the meeting held on 19 September 2023 as a correct record.	1
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<http://fylde.cmis.uk.com/fylde/DocumentsandInformation/PublicDocumentsandInformation.aspx>

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DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
HEAD OF PROJECTS AND REGENERATION	EXECUTIVE COMMITTEE	17 OCTOBER 2023	4
ST ANNES SEAWALL UPDATE REPORT			

PUBLIC ITEM

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

RELEVANT LEAD MEMBER

This item is within the remit of Lead Member for Environment (Councillor Thomas Threlfall).

PURPOSE OF THE REPORT

The report provides an update following the receipt of costed detailed design work which identifies that the cost of the St Annes Seawall capital scheme will significantly exceed the available budget set at the Outline Business Case stage. The report requests members to accept the officer recommendation not to proceed to procurement and delivery of the scheme, and instead refocus efforts to deliver elements of the Island Masterplan ahead of replacement of the Seawall by 2033, as identified in the Fylde Council Strategy Appraisal Report which sits within the Shoreline Management Plan for the Fylde coastline.

RECOVERABILITY

This decision is recoverable under section 7 of part 3 of the constitution.

RECOMMENDATION

1. The Executive Committee is requested to accept the recommendation not to proceed with procurement and delivery of the St Annes Seawall capital scheme due to significant cost increases identified as part of the detailed design work undertaken to date, and the significant risk of potential business disruption costs exceeding their budget allocation.

REPORT

BACKGROUND AND SUMMARY

1. The Council remain committed to protecting the Island strategic headland which not only protects 510 properties and businesses from coastal erosion and flooding but maintains healthy beaches and dunes.
2. The project to replace the existing ageing seawall is complex due to the locality of over twenty businesses in the heart of the commercial/tourist area, and the requirement to increase its comparatively low level by 2.8m. It requires a phased construction approach but would still result in significant disruption to existing businesses, some support the project, and some do not, it will be necessary to secure legal agreements that could include business displacement and / or compensation packages.

3. Detailed analysis of the design has provided evidence that the cost of delivering the project has increased resulting in a significant funding gap of over **£15 million** triggering a necessary review of the viability of the project.
4. The likelihood of attaining funding to bridge the gap is 'very low' with the limited options taking a considerable amount of time and resource to secure a decision that may or may not be favourable. It is also 'highly likely' that further funding to support anticipated future business disruption cost and compensation claims will be required; but will be only known post construction with any budget overspend to be met by Fylde Council.
5. The financial risk with the project is considered to be so significant that the officer recommendation is **that the project is suspended** albeit with the marine licence and planning permission (with conditions) secured, and that it should be reviewed in 2030 in line with the Environment Agencies recommended time frame to consider the sea defence structure at this location. The Council had originally decided to bring forward delivery of the St Annes Seawall project from its original delivery date of 2033.
6. It has been challenging in attempting to gain signed agreements and permissions with key stakeholders, and hence there is considerable risk to the project in terms of potential business disruption costs, and construction delay costs should construction commence. Suspending the start of the construction phase will allow time for work to be carried out to rationalise lease agreements with businesses on The Island and with developers to secure potential contributions to deliver The Island element of the St Annes Masterplan potentially in conjunction with the sea defence works. This would achieve a better "fit for purpose" project in a climate where the risks are more manageable.

COST BREAKDOWN

7. Jacobs UK submitted the marine licence application in December 2022, a valid planning application in April 2023) and completed the detailed design in March 2023.
8. Volker Stevin produced a detailed cost estimate to construct the project in July 2023. The construction costs have risen considerably, as shown in Table 1 below.

Table 1: August 2023 Construction Cost Based on Detailed Design

Description	Costs at Various Stages £m		
	Approval of OBC 04/10/21 £m	Operational Management Committee Report approved 15/03/22 £m	Construction costs returned - 14/08/23 £m
Surveys, detailed design, consents, project management, supervision	0.890	1.429	1.429
Business support/disruption	0.600	0.600	0.600
Construction costs	8.809	8.809	23.981
Risk	1.811	1.273	1.273
Total Project Cost	£12.110m	£12.110m	£27.283m

9. The construction cost has increased by **£15.172m** from the original OBC cost estimate in 2021, this is primarily due to inflation of materials, professional fees, labour, development of the detailed design, as well as the OBC original cost estimate being based on the Fairhaven and Granny's Bay design.
10. The design requirements for the sea wall at St Annes have proven to be significantly different requiring more material for deeper sections of stepped revetment (increased from 210mm to 350mm), and thicker concrete blinding over the lower sections of revetment (increased from 100mm to 250mm and now reinforced), the introduction of a pile cap and heavier and longer steel piles, a higher specification of permitted backfill materials, and very robust retaining and set back wall sections and foundations.
11. The works will require an additional three-month programme (June – September 2024) to excavate the boating lake bank to construct a large foundation for a 135m long wall to retain the seaward lake bank (originally a

grassed slope at OBC stage), which also has the knock-on effect of increasing the preliminaries (site establishment costs).

Table 2: Headline Cost Increases

Ref	Description	Cost Increase from OBC estimate in 2021 (£m)	Comment
1	Precast Concrete	4.90	A generic rate of £500/unit was used in the OBC estimate, the current rate is £2,000/unit + specials.
2	Piling	0.83	Due to more robust design and an increase in steel costs
3	Promenade Slab	0.71	The promenade width has increased from 5.5m to 8.2m to allow for defence raising in Year 50 by building on top of the structure whilst maintaining a minimum 5.5m width, associated with an increase in material cost.
4	Blinding & Pile Cap	0.64	More robust design.
5	Ducting & Electrical	0.61	Three electrical diversions are required to accommodate the beach huts and miniature railway – nominal provision at OBC stage.
6	Earthworks	0.58	Higher material specification and material cost increase.
7	Wall foundations & Steps	0.54	More robust design.
8	Handrailing	0.40	New item on V shaped walls.
9	Landscaping	0.36	New item to accommodate the design.
10	Flood Barrier	0.32	New item (RNLI rejected previously agreed OBC layout)
11	Boating Lake Wall	0.22	New item to accommodate the design.
12	Boating Lake Pipework & Chambers	0.17	New item to accommodate the design.
13	Miniature Railway Track	0.13	New item to accommodate the design.
14	RNLI Temporary Compound	0.10	New item to accommodate the design.
15	Suction Lifter	0.10	Not allowed for in OBC
16	Miniature Railway Earthworks	0.88	New item to accommodate the design.
17	Swimming Pool Car Park	0.79	New items to accommodate the design.

COSTS TO DATE

12. The final account for the detailed design commission by Jacobs UK is still to be finalised and agreed however it has been confirmed that all costs incurred on the scheme to date including the costs for the detailed design phase of the works will be covered in full by the Environment Agency. Once the final costs are known and agreed these will be reflected in the Council's Capital Programme and regular Capital Monitoring Reports, with the costs fully funded by the Environment Agency.

NEXT STEPS

13. If the Committee approves the recommendation, a press release will be issued to confirm the decision not to progress the delivery of the project. Officer capacity will be used to progress elements of the St Annes Island Masterplan, working with funders and stakeholders to bring forward development on the site. The Fylde Council Strategy Appraisal Report commits Fylde Council to replacing the St Annes Seawall by 2033.

CORPORATE PRIORITIES

Economy – To create a vibrant and healthy economy	✓
Environment – To deliver services customers expect	✓
Efficiency – By spending money in the most efficient way	✓
Tourism – To create a great place to live and visit	✓

IMPLICATIONS

Finance	The council's capital programme contains St Annes Seawall capital scheme in accordance with the previous decisions made by the council as summarised in the report. Funding for the scheme includes the council's contribution of £2.3m towards the total project cost to be met from the Funding Volatility Reserve. This report recommends not proceeding any further with the scheme at this time, and notes that confirmation has been received from the Environment Agency that all costs incurred to date will be met in full by them. Therefore the council's earmarked £2.3m contribution will no longer be required and will remain in the Funding Volatility Reserve.
Legal	None arising from this report
Community Safety	None arising from this report
Human Rights and Equalities	None arising from this report
Sustainability and Environmental Impact	None arising from this report
Health & Safety and Risk Management	None arising from this report

SUMMARY OF PREVIOUS DECISIONS

Operational Management Committee – 15th March 2022

1. To draw down £538,500 funding from the approved risk/contingency budget for the project to deliver the development stage at a total cost of £1,383,500 (expenditure detailed in Table 4) through the Councils approved capital programme as detailed within the report and update the overall phasing of the programmed expenditure as detailed in Table 3.
2. To approve the engagement of Jacobs UK at a cost of £544,000 and Volker Stevin Civil Engineering Contractors at a cost of £123,500 to deliver the Planning Stage as detailed below in paragraphs 16-19 from within the £1,383,500 described above.

Operational Management Committee -14th July 2021

1. To recognise the volume and strength of response as part of the consultation exercise and incorporate the retention of local attractions such as the miniature railway, beach huts and pitch and putt golf course.
2. To approve Option 3C as detailed in the report as the Council's preferred option.
3. Subject to Environment Agency approval of the Outline Business Case, approve the commencement of the Phase 2 Planning Stage of this project set out in the report at an estimated cost of £845,000 with the works being funded from the Environment Agency flood defence grant in Aid programme: £600,000 from the Council's 2021/22 capital programme and £245,000 from the 2022/23 capital programme.
4. Subject to Environment Agency approval of the Outline Business Case, approve the drawdown of the £600,000 business support budget.
5. Approve the procurement approach as set out in the report to use the Environment Agency's National Framework to procure the consultant and contractor, and to deliver the development stage of the St Annes

Sea Wall project. To authorise that contracts are to be then entered into through the Environment Agency's National Framework for the Planning Studies.

Council – 5 July 2021

1. To approve a fully funded addition to the St Annes Seawall capital scheme within the Council's capital programme to the sum of £11,820,700 funded by Environment Agency grant of £9,520,700 and the Council's contribution of £2,300,000 towards the total project cost to be met in full from the Funding Volatility Reserve and phased as detailed within the body of this report from 2021/22 – 2024/25.
2. Subject to approval a further report will be presented to the Operational Management Committee to seek agreement of the final design, scheme costs and procurement route.

Operational Management Committee – 16 June 2021

1. To recommend to Council approval of a fully funded addition to the St Annes Seawall capital scheme within the Council's capital programme to the sum of £11,820,700 funded by Environment Agency grant of £9,520,700 and the Council's contribution of £2,300,000 towards the total project cost to be met in full from the Funding Volatility Reserve and phased as detailed within the body of this report from 2021/22 – 2024/25.
2. Subject to approval a further report will be presented to the Operational Management Committee to seek agreement of the final design, scheme costs and procurement route.

Operational Management Committee - 16 March 2021

To appoint Councillor John Kirkham as the representative to join the project board, oversee the development of the project and report back to the Operational Management Committee on progress on a regular basis.

Operational Management Committee - 8 September 2020

1. To recommend to Council approval of a new fully funded capital scheme 'St Anne's Sea Wall' within the Council's Capital Programme for 2020/21 in the sum of £300,000, to be met in full, from the Environment Agency flood defence grant in Aid programme.
2. Subject to 1 above, approve the commencement of the proposed development studies as identified in the report in the sum of £300,000, with the works being funded from the Environment Agency flood defence grant in Aid programme;
3. To approve the procurement approach detailed in the report to use the Environment Agency's National Framework to procure the consultants to deliver the development stage of the St Anne's Sea Wall project. To authorise that a contract(s) to be then entered into through the Environment Agency's National Framework for the Development Studies.

Community Focus Scrutiny Committee - 14 October 2010

To endorse the decision of Cabinet to adopt the policies set out in the North West England and North Wales Shoreline Management Plan for the Fylde coastline.

Cabinet- 15 September 2010

Adoption of the Shoreline Management Plan (SMP)

That subject to consideration and comment by the appropriate scrutiny committee to adopt the policies set out in the North West England and North Wales Shoreline Management Plan for the Fylde Coastline.

BACKGROUND PAPERS REVELANT TO THIS ITEM

Name of document	Date	Where available for inspection
N/a		

LEAD AUTHOR	CONTACT DETAILS	DATE
Charlie Richards	Charlie.richards@fylde.gov.uk 01253 658520	6 th October 2023

This item was removed prior to the publication of the agenda

This item was removed prior to the publication of the agenda

This item was removed prior to the publication of the agenda

DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
INTERNAL AFFAIRS SCRUTINY COMMITTEE	EXECUTIVE COMMITTEE	17 OCTOBER 2023	6
PLANNING PEER REVIEW – PROPOSED ACTION PLAN			

PUBLIC ITEM

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

RELEVANT LEAD MEMBER

This item is within the remit of Lead Member for Corporate and Economic Development (Councillor K Buckley)

PURPOSE OF THE REPORT

As part of its continuous review of services, the council invited the Planning Advisory Service to carry out a peer review of the council's planning service. Feedback on a draft action plan, developed to address the recommendations that emerged from the review, has been considered through the council's scrutiny process to arrive at a final draft of the action plan, which is now placed before the Executive Committee for consideration.

The Executive Committee are asked to consider the amendments made to the draft action plan through the scrutiny process, to approve the final draft of the Planning Peer Review Action Plan and to ask the Internal Affairs Scrutiny Committee to oversee the delivery of the action plan.

RECOVERABILITY

This decision is recoverable under section 7 of part 3 of the constitution.

RECOMMENDATIONS

The Executive Committee are recommended to:

1. Accept the amendments to the Planning Peer Review Action Plan recommended by the Internal Affairs Scrutiny Committee,
2. Approve and adopt the Planning Peer Review Action Plan, and
3. Request the Internal Affairs Scrutiny Committee to oversee and monitor delivery of the approved action plan.

REPORT

1. On 8 June 2022 Planning Committee agreed the scope for a Planning Advisory Service (PAS) review of Fylde Council's Planning Service. PAS set out the process for a Peer Challenge in a proposal letter dated 27th June 2022, with the on-site peer challenge taking place from 5 - 7 October 2022. The final report was received in December 2022 and presented to the Planning Committee as an information item on 18 January 2023. The review's final report includes recommendations drawn from the evidence provided to the team and from desk top research on the service, with the rationale for each recommendation being included in the report. The

recommendations outline areas the council should address to achieve improvements to the planning service as well as to the relationship between the service, the council and other stakeholders.

2. In order to address the recommendations contained in the report, a draft Planning Action Plan was developed and presented to the Planning Committee on 8 March 2023. The Planning Committee resolved to approve the draft action plan and asked that it be circulated to stakeholders for comment and feedback prior to adoption through the new governance arrangements.
3. On 8 June 2023 a scoping report was presented to the Internal Affairs Scrutiny Committee who requested the Head of Planning to review the feedback received and make any changes to the Action Plan that he considered necessary ahead of the action plan being scrutinised via an abbreviated spotlight review and the reporting of the conclusions of the review to the Executive Committee for consideration.
4. The abbreviated spotlight review took place on 24 August 2023, when the appointed sub-group reviewed the draft action plan as amended by the Head of Planning and considered the feedback that had been received on the original draft. The sub-group recommended further changes to the action plan and agreed a schedule of responses to the feedback.
5. The final draft of the Planning Peer Review Action Plan is attached as appendix 1. To assist members in identifying how the action plan has developed since it was first drafted, appendix 2 contains a tracked version of the report which indicates the initial changes made by the Head of Planning in red and the further changes recommended through the abbreviated spotlight review in blue.
6. In summary, since the initial draft plan was considered by the Planning Committee in March 2023, the key changes to the action plan are as follows:
 - Full supporting text of recommendations added to ensure context of recommendation is clear and context for Fylde deleted to avoid repetition.
 - Target dates amended, confirmed as completion dates and assigned to individual actions to ensure clarity, assist monitoring and ensure achievability.
 - Priorities changed to impacts to clarify delivery timeframes.
 - Indicators of success added to assist in monitoring delivery of the action plan.
 - Individual actions identified to allow effective monitoring.
 - Monitoring Framework added to assist in monitoring the overall impact of the action plan.
7. The schedule of responses to the feedback agreed by the scrutiny sub-group is attached as appendix 3.
8. The Executive Committee is requested to consider the amendments made via the scrutiny process and approve the Planning Peer Review Action Plan. The Internal Affairs Scrutiny Committee has asked that regular updates be provided to them to allow the implementation of the action plan to be monitored and its effectiveness in improving the service to be assessed.

CORPORATE PRIORITIES	
Economy – To create a vibrant and healthy economy	
Environment – To deliver services customers expect	√
Efficiency – By spending money in the most efficient way	√
Tourism – To create a great place to live and visit	

IMPLICATIONS	
Finance	Any projects identified in the action plan that require resourcing that cannot be met from within existing budgets will be the subject of further reports to the Executive Committee.
Legal	None
Community Safety	None
Human Rights and Equalities	None
Sustainability and Environmental Impact	None
Health & Safety and Risk Management	None

SUMMARY OF PREVIOUS DECISIONS
<p>On 20 June 2023 - Internal Affairs Scrutiny Committee RESOLVED that:</p> <ol style="list-style-type: none"> 1. Mr Evans reviews the comments received as part of the consultation process set against the draft action plan; and 2. If considered necessary, makes amendments to the draft plan, and; 3. Amends the dates as detailed within the Scrutiny Review Scoping Template to reflect a realistic current timeframe; and following the above process 4. A group of identified Members of the Committee (Councillors Damian Buckley, Griffiths, Kirkham, Redcliffe and Fazackerley) review the amended action plan via an abbreviated spotlight review; and 5. The group make recommendations to the Executive Committee with regard to the proposed final draft action plan. <p>On 8 March 2023 – Planning Committee - RESOLVED to approve the draft PAS Review Action Plan included at Appendix 1 to the report to be circulated to stakeholders for comment and feedback prior to adoption through the new governance arrangements.</p> <p>On 8 June 2022 – Planning Committee RESOLVED to approve the scope of the Planning Advisory Service Review and emphasised that the Peer Review Team be specifically asked to meet with representatives of local Town and Parish Councils and to review and comment on the implementation of actions set out in the previous review which took place in 2012.</p>

BACKGROUND PAPERS REVELANT TO THIS ITEM		
Name of document	Date	Where available for inspection
Planning Service Peer Challenge – Feedback Report	January 2023	FBC Website

LEAD AUTHOR	CONTACT DETAILS	DATE
Mark Evans	mark.evans@fylde.gov.uk & Tel 01253 658460	September 2023

Attached documents

- Appendix 1 - Planning Peer Review Action Plan (Final Draft)
- Appendix 2 - Planning Peer Review Action Plan (with Tracked changes)
- Appendix 3 - Schedule of responses to feedback on draft action plan

PLANNING PEER REVIEW ACTION PLAN

THE PAS RECOMMENDATION	THE PAS SUMMARY	IMPACT / TARGET COMPLETION DATE	LEAD OFFICER(S)
THEME: VISION & LEADERSHIP			
R1 - Set up a politically representative board of councillors and one for senior officers to oversee and input into the production of the next Local Plan period beyond 2032	There is a tension between growth and protecting the environment and heritage. It is therefore important to establish a process to coordinate, capture and agree the focus for the Local Plan beyond 2032. A formal governance structure will help to set the vision and longer-term aspirations. It will provide clarity and managing tensions between economic growth, the environment and preservation. It will strategically address the housing and homelessness challenges. Obtaining clarity on key strategic issues as early as possible in the plan production process is critical in making the process resilient to changes to the planning system and election cycles. <p style="text-align: right;">(Paragraphs 7.7 – 7.10)</p>	Medium – based on long term planning and long-term time frame.	
Actions:	1.1 Establish two Local Plan 2032 Delivery Boards – the officer board to include housing and economic development, elected member board to be determined through the Executive Committee after May 23. (R1) Success = Officer and member local plan boards established	March 2024	AO/MDE
	1.2 Include matters relating to planning as a regular Heads of Service Standing Item to ensure senior officer awareness. Success = Standing Item introduced	July 2023	
	1.3 Continue to monitor and review the local plan and prepare for drafting of replacement plan to ensure in line with national policy and corporate plan objectives – through the two boards. Success = Local plan reviewed/revised ahead of 5-year statutory requirement	December 2025	
Outcomes:			
<ul style="list-style-type: none"> a) Clarity of focus on vision and long-term aspirations. b) Tensions reduced between economic growth, environment and preservation. c) Housing and homelessness challenge addressed. d) Synergy between Local Plan 2032 and Corporate Plan 			

<p>R2 - Strengthen the governance structure to give Planning earlier and better strategic oversight of major development schemes.</p>	<p>Embedding planning input much earlier in corporate projects to make planning an enabler not a blocker to development. This will give senior leadership comfort that projects are moving forward positively and improve risk management and ensure processes and protocols are followed.</p> <p>The governance arrangement could consist of 2 'Boards'. A Planning and Regeneration Board (officers) - this holds more operational / professional focused conversations across service areas. The other board operates at a strategic level. It focuses on bringing the politics and regional considerations together. The operational Board reports to the strategic Board. This ensures that political and strategic considerations feedback directly. This will help keep the Planning Service aligned with the political landscape.</p> <p style="text-align: right;">(Paragraphs 7.11 – 7.13)</p> <p>Planning should not work in isolation. It should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process.</p> <p style="text-align: right;">(Paragraphs 7.14 – 7.15)</p>	<p>High – quick win because already in progress and significant impact.</p>	
<p>Actions:</p>	<p>2.1 Revise, embed and publish Corporate Project Delivery process to ensure compulsory requirement for planning input (R2).</p> <p>Success = Requirement to consider planning implications embedded in delivery framework for corporate projects</p>	<p>March 2024</p>	<p>AO/CR/MDE</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Corporate projects are enabled by early planning input. b) Risk management improved. c) Project plans streamlined. 			

THEME: SERVICE DELIVERY & PERFORMANCE MANAGEMENT

<p>R3 - Delegate decision making among a greater number of staff</p>	<p>The planning department has experienced and competent staff at all levels. The service can be confident and allow decision making across a greater number of staff. This will help reduce failure demand resulting from process 'bottlenecks and communications issues. It will empower staff; create capacity and support career development.</p> <p style="text-align: right;">(Paragraphs 8.4, 8.5)</p>	<p>High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation).</p>	<p>MDE</p>
<p>Actions:</p>	<p>3.1 Appoint Independent consultant to review the process for planning applications and related submissions, including procedures, roles, responsibilities (including opportunities to increase delegation of decisions across the team (subject to displaying suitable experience to be assessed via the appraisal process)), management, engagement, customer service etc. external support and best practice from similar local authorities.</p>		<p>AO/MDE/ASc</p>

	Success = Independent review of development management processes completed and recommendations successfully implemented.	June 2024	
Outcomes: <ul style="list-style-type: none"> a) Capacity created/waste, duplication and bottlenecks reduced. b) Empowerment and responsibilities consistent with post holders. c) Communication and customer service improved. d) Increased career development opportunities. e) Extensions of time reduced. f) Technology used efficiently in delivery of the service. 			
R4 - Create a clear set of processes for the Development Management Service	It is unclear where responsibility lies for different parts of the process. This is creating inconsistencies and an imbalance in the work of senior officers. "Delegating Up" is common. Decisions, queries, complaints, and validation are carried out by senior officers. This raises questions of whether responsibilities and empowerment are in the right places. This affects-senior officer capacity for reviewing and improving planning processes. (Paragraph 8.6)	High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation).	
Actions:	4.1 Produce a development management manual document all processes including any revisions identified through a review of workflows. Success = Development Management Manual created	June 2024	AS
	4.2 Through appraisals make all employees aware of roles and responsibilities within the team and approved processes. Success = Awareness of roles and responsibilities addressed in staff appraisals	November 2023	
Outcomes: <ul style="list-style-type: none"> a) Empowerment and responsibilities consistent with post holders b) Effective use of resource c) Appropriate distribution of workload 			

<p>R5 - Continue to review processes as part of 'business as usual'.</p>	<p>Often improvement work can become a one-off project. Fylde planners are embedding process reviews as part of their regular team meetings. This creates opportunities to streamline and improve processes. The focus should be on reducing double-handling/protracted sign-off procedures and addressing validation issues. See also Recommendation R8. (Paragraphs 8.7)</p>	<p>High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation).</p>	
<p>Actions:</p>	<p>5.1 Embed process review in team meetings including documentation of improvement actions that are implemented via updates to Development Management Manual. Success = Staff feedback on processes regularly features in Team Briefing and feedback on suggestions provided</p>	<p>June 2023</p>	<p>AS</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Empowerment and responsibilities consistent with post holders b) Effective use of resource c) Appropriate distribution of workload 			

<p>R6 - Reduce the reliance on Extensions of Time (EoTs).</p>	<p>Linked to Recommendation R5 A key outcome of service improvement work should be the reduction of Extensions of Time (EoT). EoTs often result in a build-up of applications without a decision. This has a negative effect on the customer experience and service. (Paragraph 8.4.2)</p>	<p>High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation).</p>	
<p>Action 6:</p>	<p>6.1 Review reasons for extensions of time (EoT). Success = EoT Review completed</p>	<p>September 2023</p>	<p>MDE/AS</p>
<p>6.2 Review process to avoid EoT that do not add value. Success = EoT process reviewed, reason for EoT documented, annual review of reasons for requesting EoTs in place</p>	<p>March 2024</p>		
<p>6.3 Benchmark Fylde's use of EoT against other Lancashire authorities Success = Use of EoT by other Lancashire Authorities completed</p>	<p>March 2024</p>		

	6.4 Seek feedback from agents on use of EoT. Success = Feedback from agents received	December 2023	
	6.5 Introduce a performance indicator that measures use of EoT's Success = Performance measure for EoT's introduced and reporting (see Action 6.2) in place	April 2024	
Outcome: a) Unnecessary extensions of time reduced			

R7 Work through the PAS Development Management (DM) Toolkit. As part of ongoing process and service improvement work.	Linked to Recommendation R6 above. The toolkit provides a series of improvement challenges for the development management service. It includes ideas for what an 'excellent' DM service looks like. -This could complement a service improvement plan and ongoing process improvement work. (Paragraph 8.8)	Medium – initial generic ideas for process improvement then longer-term guide.	
Actions:	7.1 Complete review of Development Management process utilising PAS toolkit to inform workflow review. Success = PAS DM Toolkit evaluation completed	July 2024	MDE/AS
Outcomes: a) Toolkit applied to inform process review best practice b) Toolkit embedded as a measure of performance for development management			

R8 - Produce a Planning Service Plan that has clear and direct links to the corporate priorities	The Planning Service needs a clearer sense of its own objectives and priorities. These need a direct link ("golden thread") to the corporate priorities. This will allow officers to better allocate their limited time. The staff appraisal process should also provide a clear link back to the service plan. An outcomefocused service plan will build upon the good work that the Service is already delivering and including service standards will help reflect the more pro-active approaches to customer service that the Council desires. (Paragraph 8.9)	Medium – to be embedded as part of the corporate process linking individual outcomes to the Corporate Plan through service planning.	
Actions:	8.1 Produce a service plan for the planning service in line with revised corporate procedures and template, linked to the corporate plan objectives and appraisals to establish 'golden thread' from individual to corporate outcome Success = Planning service plan produced	August 2023	Management Team

Outcomes:

- a) Planning service objectives and actions linked to corporate priorities
- b) Appraisals linked to 'outcome focused' service plan
- c) Proactive approach to customer service.

R9 - Provide additional investment in the planning service to bring it up to date with the technology and cyber-security needs of a modern planning service.	Officers need to be confident in the new back-office IT system. It needs investment to get it fully functioning. There is presently a potential data-gap risk in the system. There are also processes and technology that need updating. This includes access to digital plans, telephony, and web-access kit available off-site. Some staff use their own technology; this represents a potential data-security risk. (Paragraphs 8.11, 8.12)	High – will be integral to a review of workflow with technology reducing waste, duplication, and human input wherever possible = efficient.	
Actions:	<p>9.1 Review & invest in the technology used to deliver the service (R3/R4/R5/R6/R9), Success = IT review completed.</p> <p>9.2 Identify opportunities for development of recently introduced DEF software. / Success = DEF improvements identified and a programme of improvements in place.</p> <p>9.3 Deliver identified improvements to Geographical Information System Software (GIS) / Success = Programme of GIS improvements in place including integration with DEF.</p> <p>9.4 Develop staff to utilise digital upgrades./ Success = Staff training and development completed.</p> <p>9.5 Explore options for a development plans module./ Success = Need for development plans module reviewed and actioned as appropriate.</p> <p>9.6 Secure resources necessary to support investment in software development. / Success =Review of IT resource requirement complete and resources secured.</p> <p>9.7 Roll out of cloud telephony service./</p>	<p>April 2024</p> <p>April 2024</p> <p>April 2024</p> <p>April 2024</p> <p>December 2024</p> <p>April 2024</p>	AO/MDE/AS/JG/RMcK

	Success =All staff have access to cloud telephony.	March 2024	
	9.8 Roll out of laptop/tablet/managed device to team. Success = All staff have access to managed devices.	June 2023	
	9.9 Develop working practices to incorporate mobile working. Success = Mobile working solutions reviewed and adopted where appropriate.	March 2024	

Outcomes:

- a) Technology maximised and used efficiently to deliver the service

R10 -Establish an Agent's/Developer's forum, with an external chair	A Developer Forum will help communication between the Planning Service and its customers. A Forum allows discussion /resolution of issues. All can agree on a specific and timetabled number of issues / standing items to work on and co-produce. These arrangements is requires year-on-year commitment to work well. Consider various formats that work for all involved and encourages attendance and engagement. (Paragraph 8.14)	Medium – Review of workflow should release capacity to plan and manage a dedicated forum, corporate support will be provided.	
Actions:	10.1 Seek views from regular agents regarding the preferred forum for engagement (including frequency, joint LA forums, time of day) Success = Views of regular agents on establishment of a forum received	December 2023	MDE/Corporate
	10.2 Subject to outcome of action 10.1 establish agents' forum with independent chair Success = Agent's forum established with independent chair (subject to desire of agents)	July 2024	

Outcomes:

- a) Agent & Developer Forum established and engagement in place.

<p>R11 - Enforcement priorities and protocols need to be made clear.</p>	<p>Members and town/parish councils are unclear about how enforcement works and why some things are not considered important enough to enforce. The service needs to help stakeholders understand the process, the priorities, and the practicalities of carrying out enforcement action so that expectations are clear and can be managed. The service should refresh and make available the Enforcement Policy statement, setting out what types of planning breach are a high priority and what options there are to resolve breaches.</p> <p style="text-align: right;">(Paragraph 8.15)</p>	<p>Medium – work already in progress can be quick win.</p>	
<p>Actions:</p>	<p>11.1 Refresh of the enforcement policy and process when a breach occurs that is approved through new governance arrangements from May 23</p> <p>Success = Enforcement policy reviewed and considered by Executive Committee</p>	<p>March 2024</p>	<p>MDE/AS/KH</p>

Outcomes:

- a) Enforcement policy published.
- b) Approach to enforcement understood by all stakeholders.

<p>R12 - Optimise the council's webpages as an engagement tool and promote it as such.</p>	<p>The council website can provide service users with up-to- date information on planning applications. The website is not used by agents as much as it could be. Keeping it up to date and relevant, will drive more traffic to it and away from planning officers. It needs to be promoted to agents and customers.</p> <p style="text-align: right;">(Paragraph 8.16)</p>	<p>Medium– online should be first point of contact wherever possible avoiding need for human input for straight forward / transactional elements of the service.</p>	
<p>Actions:</p>	<p>12.1 Review (and continue to review) general content of planning pages to ensure up to date and relevant</p> <p>Success = Content of planning web pages reviewed and updated</p> <p>12.2 Benchmark information against other authorities</p> <p>Success = Review of other local planning authority web pages completed</p> <p>12.3 Promote interactive elements of website (application progress monitoring, need for planning permission)</p> <p>Success = Interactive pages promoted through website/social media and regular communication with stakeholders</p>	<p>April 2024</p> <p>March 2024</p> <p>April 2024</p>	<p>MDE/AS/JG/ST</p>

<p>Outcomes:</p> <ul style="list-style-type: none"> a) Updated website that is relevant, informative, and user-friendly. b) Website and digital channels used by stakeholders, especially agents/applicants.

<p>R13 - Committee practices and procedures should be kept under review. This will ensure an ongoing, open, and engaging experience for the public.</p>	<p>Planning Committee is the service's 'shop window'. It demonstrates how planning and place-shaping decisions are made. The Fylde Planning Committee observed was exemplary in many ways (see Paragraphs 8.16-8.21). There are 'continuous improvement' opportunities that will allow more time for the strategic, larger, and more contentious schemes. Paragraphs 8.25 – 8.26 contain suggestions for items to keep under review, including:</p> <ul style="list-style-type: none"> • A proportionate approach to the detail contained in officer reports and presentations. This will allow officers and members more time to focus on and debate the main issues. • Getting member's valuable input outside of the committee setting. e.g. in pre-app discussions, through technical briefings or developer's forums. Each well before an application comes to committee. • The boundary changes represent opportunities to broaden the planning experience and knowledge of a wider group of members. • Opportunities for junior case officers to gain experience by presenting at Planning Committee. This is also an opportunity to free up senior officer time. • Reviewing the application call-in terms. Resolve Parish/Town Council issues through discussion or the provision of information (rather than at committee). <p style="text-align: right;">(Paragraphs 8.10, 8.25)</p> <p>Recording and broadcasting the Planning Committee live will encourage a wider audience for planning decisions. This is standard procedure at most councils. It will help make the process much more transparent for stakeholders and communities. Having access to recordings can also serve as a good improvement and training tool.</p> <p style="text-align: right;">(Paragraph 8.26)</p>	<p>Medium – incorporate in current governance review for new council from May 2023.</p>	
<p>Actions:</p>	<p>13.1 Review existing committee procedures, including frequency of meetings, time of day and live broadcast of proceedings, content of reports, introduction of technical briefings, broadening the range of officers presenting to committee, reviewing the application call in terms.</p> <p>Success = Full review of committee procedures completed, and recommendations implemented at next annual review of constitution</p>	<p>May 2024</p>	<p>IC/MDE/AS</p>
	<p>13.2 Carry out review of committee practice and procedure at least annually.</p> <p>Success = Annual review of practice and procedure takes place</p>	<p>April 2024</p>	

	13.3 Review current scheme of delegation and arrangements for resolving town and parish council referrals ahead of committee meetings. Success = Scheme of delegation reviewed and any revisions implemented	February 2024	
	13.4 Ensure members of the Planning and Executive Committees receive frequent appropriate training Success = Annual member training programme in place	April 2024	
	13.4 Ensure members of the Planning and Executive Committees receive frequent appropriate training Success = Annual member training programme in place	April 2024	
Outcome:			
<ul style="list-style-type: none"> a) Live webcasting of planning committee meetings. b) Agenda developed by members/officers. c) Procedures monitored through new governance arrangement. 			

THEME: COMMUNITY ENGAGEMENT & PARTNERSHIP WORKING

R14 - Introduce a more structured approach to obtaining and using customer feedback.	The Planning Service's approach to feedback should align with the corporate approach. The evaluation of customer feedback should form part of the performance reporting process, Doncaster Council has a customer feedback survey that goes out on individual decisions. An agent/developer Forum is another way of obtaining customer feedback (see Recommendation R10). (Paragraph 9.9)		
	14.1 Carry out regular (consistent to allow year on year comparison) customer feedback survey with assistance of corporate services team. Success = Annual customer feedback survey has been conducted	December 2023	GB/ASc
Actions:	14.2 Document survey and ad-hoc customer feedback for inclusion to service update / improvement. Success = All feedback collated and considered in annual service update	April 2024	
	14.2 Document survey and ad-hoc customer feedback for inclusion to service update / improvement Success = All feedback collated and considered in annual service update	April 2024	

Outcomes:

- a) Structured regular customer questionnaires/surveys
- b) Engagement with service improvements based on identified customer need
- c) Corporate approach to customer care incorporated into agreed processes.

<p>R15 - Take proactive steps to improving working relationships with Town and Parish Councils</p>	<p>Interaction with Town and Parish Councils is important. It helps ensure effective community interaction with the Planning system. The need for better communication between the council and its communities is recognised. The council is keen to improve things. The recommendations in this report will help improve customer service. The Peer Challenge process should also be a catalyst for:</p> <ul style="list-style-type: none"> • Providing training for council and Town/Parish Council Members. • Facilitating community involvement early on in master planning, and/or through Neighbourhood Plans. • Establishing a pro-active and structured approach to engaging with Town and Parish Councils. A re-think is required to the purpose and outcomes of the current regular Town and Parish Council Forum alongside an annual training programme. (Paragraphs 9.11 – 9.13) 		<p>Medium – existing engagement is mixed in terms of outcomes; this will be built on and improved through a review of workflow releasing capacity and improving access.</p>							
<p>Actions:</p>	<table border="1"> <tr> <td data-bbox="450 695 1563 823"> <p>15.1 Review existing parish liaison group meetings with parish and town councils</p> <p>Success = meeting arrangements for parish liaison groups has been reviewed</p> </td> <td data-bbox="1563 695 1861 823"> <p>November 2023</p> </td> </tr> <tr> <td data-bbox="450 823 1563 951"> <p>15.2 Establish training plan for parish and town councillors following May 2023 election</p> <p>Success = Town and parish council training plan in place</p> </td> <td data-bbox="1563 823 1861 951"> <p>November 2023</p> </td> </tr> <tr> <td data-bbox="450 951 1563 1078"> <p>15.3 Promote the opportunities available through neighbourhood planning</p> <p>Success = Neighbourhood planning session with town & parish council's has taken place</p> </td> <td data-bbox="1563 951 1861 1078"> <p>December 2023</p> </td> </tr> <tr> <td data-bbox="450 1078 1563 1201"> <p>15.4 Review process for objections from town and parish councils</p> <p>Success =Process for considering comments of town and parish councils has been completed</p> </td> <td data-bbox="1563 1078 1861 1201"> <p>November 2023</p> </td> </tr> </table>	<p>15.1 Review existing parish liaison group meetings with parish and town councils</p> <p>Success = meeting arrangements for parish liaison groups has been reviewed</p>	<p>November 2023</p>	<p>15.2 Establish training plan for parish and town councillors following May 2023 election</p> <p>Success = Town and parish council training plan in place</p>	<p>November 2023</p>	<p>15.3 Promote the opportunities available through neighbourhood planning</p> <p>Success = Neighbourhood planning session with town & parish council's has taken place</p>	<p>December 2023</p>	<p>15.4 Review process for objections from town and parish councils</p> <p>Success =Process for considering comments of town and parish councils has been completed</p>	<p>November 2023</p>	<p>TM/MDE</p>
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<p>15.4 Review process for objections from town and parish councils</p> <p>Success =Process for considering comments of town and parish councils has been completed</p>	<p>November 2023</p>									
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Parish & Town Council liaison improved b) Relations with Parish and Town Councillors strengthened c) Opportunities for place-shaping increased d) Annual training programme delivered 										

THEME: ACHIEVING OUTCOMES			
R16 - Review the approach to developer contributions.	Fylde does not operate the Community Infrastructure Levy (CIL) relying on Section 106 (S106) developer contributions. The Levelling Up & Regeneration Bill (LURB) has a provision for an 'Infrastructure Levy'. The Infrastructure Levy will operate similarly to CIL in that it will be for infrastructure requirements across the borough, rather than a site- specific S106 agreement (it is also proposed that S106 may operate only on large schemes). (Paragraphs 10.9)	Medium – officers monitoring progress and outcomes from the Bill ahead of review and levy proposal.	
Actions:	16.1 Implement the Infrastructure Levy contained in the Levelling up and Regeneration Bill once enacted by parliament Success = Infrastructure Levy has been successfully introduced in line with national legislation and Guidance	Subject to introduction of legislation	MDE/JG
Outcomes: a) Infrastructure Levy implemented b) Monitoring and reporting of developer contributions published			
R 17 - Deliver the recommendations of the review/audit of Section 106 arrangements carried out in September 2022.	The Levelling Up & Regeneration Bill (LURB) is proposing changes to developer contributions. The way Section 106 operates may change. As well as Recommendation R16The council should also implement the recommendations of the Section 106 audit. The priority recommendations include: <ul style="list-style-type: none"> continuity/resources (just one member of staff is currently involved in monitoring payments and spend) better documented procedures better monitoring of the collection and status of section 106 monies (Paragraph 10.10)	Medium – audit actions published and will be matched with actions from PAS review to complement and avoid duplication.	
Actions:	17.1 Implement the 8 recommendations of the Sn 106 internal audit report <ul style="list-style-type: none"> procedural guidance, service level agreements 		MDE/AS

	<ul style="list-style-type: none"> • Business Continuity arrangements • Reporting of collection of 106 funds • Approval affixation • Approval status of agreements on website • Listing of agreements via website • Spending of monies <p>Success = The 8 recommendations of the 106 Audit have been actioned.</p>	<p>April 2024</p>	
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<p>Outcomes:</p> <ul style="list-style-type: none"> a) Recommendations of Section 106 audit implemented b) Infrastructure Levy implemented 			
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<p>R18 - Investigate how closer working relationships can be forged with the Housing Team.</p>	<p>Fylde’s Housing Team expressed a desire to work more closely with Planning to address a rapidly growing homelessness problem. This is a corporate issue that links into the Borough’s Homelessness and Rough Sleeping Strategy 2020-2025.</p> <p style="text-align: right;">(Paragraph 10.8)</p>	<p>Medium – ongoing role of Heads of Service through regular engagement, include as a bespoke connection that is required.</p>	
<p>Actions:</p>	<p>18.1 Review need for affordable housing in the borough through the completion of an Affordable Housing Needs Survey</p> <p>Success = Affordable Housing Needs Survey has been completed</p>	<p>March 2023</p>	<p>MDE/JG/KR</p>
<p>18.2 Review tenure of affordable housing required to address local issues and reduce reliance on temporary (B&B) accommodation through revisions to the Affordable Housing Supplementary Planning Document.</p> <p>Success = Affordable Housing Supplementary Planning Document has been updated and adopted by the council</p>	<p>April 2024 (subject to Scrutiny Review)</p>		

<p>Outcomes:</p> <ul style="list-style-type: none"> a) Planning is embedded as a core service and part of the authority linked to other strategic services such as housing (homelessness). 			
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LEAD OFFICERS

AO – Allan Oldfield Chief Executive	AS – Andrew Stell Development Manager	ASc – Alex Scrivens Corporate Performance and Engagement Manager
CR- Charlie Richards Head of Regeneration and Projects	GB – Gemma Broadley Head of Corporate Service	IC – Ian Curtis Head of Governance
JG- Julie Glaister Planning Policy Manager	KH – Katie Halpin Senior Planning Enforcement Officer	KR – Kirstine Riding Housing Services Manager
MDE – Mark Evans Head of Planning	RMc – Ross McKelvie ICT Manager	ST – Sally Thompson Research and Information Officer
TM – Tracy Manning Deputy Chief Executive		

MONITORING FRAMEWORK

The overall effectiveness of the action plan in delivering improvement in the planning service will be judged, year on year, against the following performance indicators:

Indicator	2022/23	2023/24	2024/25	2025/26	2027/28
Minor applications determined within 56 days.	90.91%				
Major applications determined within 91 days.	98.02%				
Other applications determined within 56 days.	97.45				
Average length of time (in days) to determine planning applications.	TBC				
Percentage of applications subject to an extension of time.	43%				
Number of complaints upheld by the Ombudsman.	2 (of 4)				
Percentage of planning appeals won.	75% (6 of 8)				

DOCUMENT CONTROL

Version	Date	Changes
0.1	March 2023	Draft improvement plan as considered by Planning Committee on 8 March 2023
0.2	August 2023	<p>Amendments for consideration by Mini-Spotlight Review Scrutiny Panel</p> <ul style="list-style-type: none"> • Full recommendation supporting text added and Context for Fylde deleted. • Deadlines adjusted, allocated to individual actions and "priority" changed to "Impact". • Indicators of Success and Monitoring Framework added. • Document control and page number footer added. • Lead Officer roles added. • Formatting updates.
0.3	August 2023	<p>Mini-spotlight review Scrutiny Panel recommendations</p> <ul style="list-style-type: none"> • Target dates reviewed and amended • Actions expanded to aid clarification • Quantum added to appeal performance target

PLANNING PEER REVIEW ACTION PLAN

THE PAS RECOMMENDATION	THE PAS SUMMARY	CONTEXT FOR FYLDE	PRIORITY/IMPACT/ COMPLETION TARGET DATE	LEAD OFFICER(S)
THEME: VISION & LEADERSHIP				
R1 - Set up a politically representative board of councillors and one for senior officers to oversee and input into the production of the next Local Plan period beyond 2032	<p>There is a tension between growth and protecting the environment and heritage. <u>It is therefore important to</u> establish a process to coordinate, capture and agree the focus for the Local Plan beyond 2032. A formal governance structure <u>will help</u> to set the vision and longer-term aspirations. <u>It will</u> provide <u>ing</u> clarity and managing tensions between economic growth, the environment and preservation. It will strategically address the housing and homelessness challenges. Obtaining clarity on key strategic issues as early as possible in the plan production process is critical in making the process resilient to changes to the planning system and election cycles.</p> <p style="text-align: right;"><u>(Paragraphs 7.7 – 7.10)</u></p>	<p>Post 2023 elections appoint member and officer boards. Draft delivery plan for 2032 Local Plan linked to Corporate Plan.</p>	<p>Medium – based on long term planning and long-term time frame.</p> <p>June 23</p>	
Actions:	<p>1.1 Establish two Local Plan 2032 Delivery Boards – the officer board to include housing and economic development, elected member board to be determined through the Executive Committee after May 23. (R1) <u>Success = Officer and member local plan boards established</u></p> <p>1.2 Include matters relating to planning as a regular Heads of Service Standing Item to ensure senior officer awareness. <u>Success = Standing Item introduced</u></p> <p>1.3 Continue <u>to</u> monitor and review <u>the</u> local plan and prepare for drafting of replacement plan to ensure in line with national policy and corporate plan objectives – through the two boards. <u>Success = Local plan reviewed/revised ahead of 5 year statutory requirement</u></p>		<p>March 2024</p> <p>July 2023</p> <p>December 2025</p>	AO/MDE
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Clarity of focus on vision and long-term aspirations. b) Tensions reduced between economic growth, environment and preservation. c) Housing and homelessness challenge addressed. d) Synergy between Local Plan 2032 and Corporate Plan 				

<p>R2 - Strengthen the governance structure to give Planning earlier and better strategic oversight of</p>	<p>Embedding Planning input much earlier in corporate projects to make planning an enabler not a blocker to development. <u>This will Giveing</u> senior leadership comfort that projects are moving forward positively and improve</p>	<p><u>Compulsory part of corporate project planning process in development.</u></p>	<p>High – quick win because already in progress and significant impact.</p>	
<p>major development schemes.</p>	<p>risk management and ensure processes and protocols are followed.</p> <p><u>The governance arrangement could consist of 2 ‘Boards’. A Planning and Regeneration Board (officers) - this holds more operational / professional focused conversations across service areas. The other board operates at a strategic level. It focuses on bringing the politics and regional considerations together. The operational Board reports to the strategic Board. This ensures that political and strategic considerations feedback directly. This will help keep the Planning Service aligned with the political landscape.</u></p> <p style="text-align: right;"><u>(Paragraphs 7.11 – 7.13)</u></p> <p><u>Planning should not work in isolation. It should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process.</u></p> <p style="text-align: right;"><u>(Paragraphs 7.14 – 7.15)</u></p>		<p>June 2023</p>	
<p>Actions:</p>	<p>2.1 <u>Revise, embed and publish Corporate Project Delivery process to ensure compulsory requirement for planning input (R2).</u></p> <p><u>Success = Requirement to consider planning implications embedded in delivery framework for corporate projects</u></p>		<p>March 2024</p>	<p>AO/CR/MDE</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Corporate projects are enabled by early planning input. b) Risk management improved. c) Project plans streamlined. 				
<p>THEME: SERVICE DELIVERY & PERFORMANCE MANAGEMENT</p>				

R3 - Delegate decision making among a greater number of staff	The planning department has experienced and competent staff <u>at all levels</u> . <u>The service can be confident and to</u> -allow decision making across a greater number of staff. This will <u>help</u> reduce failure demand resulting from process 'bottlenecks and communications issues. It will empower staff; create capacity and support career development. <u>(Paragraphs 8.4, 8.5)</u>	Review and redraft all aspects of the service (external support/delivery). Review role & responsibility of each resource mapped to new processes.	High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation). <u>Dec 23</u>	MDE
Actions:	3.1 Appoint Independent consultant to review the process for planning applications and related submissions, including procedures, roles, responsibilities (including opportunities to increase delegation of decisions across the team <u>(subject to displaying suitable experience to be assessed via the appraisal process)</u>), management, engagement, customer service etc. external support and best practice from similar local authorities. <u>Success = Independent review of development management processes completed and recommendations successfully implemented.</u>		<u>June 2024</u>	AO/MDE/ASc
Outcomes: <ul style="list-style-type: none"> a) Capacity created/waste, duplication and bottlenecks reduced. b) Empowerment and responsibilities consistent with post holders. c) Communication and customer service improved. d) Increased career development opportunities. e) Extensions of time reduced. f) Technology used efficiently in delivery of the service. 				
R4 - Create a clear set of processes for the Development Management Service	It is unclear where responsibility lies for <u>distinct-different</u> parts of the process. <u>This is</u> creating inconsistencies and an imbalance in the work of senior officers. "Delegating Up" is common. Decisions, queries, complaints, and validation are carried out by senior officers. This raises questions of whether responsibilities and empowerment are in the right places. <u>This affects-impacting</u> senior officer capacity for reviewing and improving planning processes. <u>(Paragraph 8.6)</u>	Review and redraft all aspects of the service (external support/delivery). Review role & responsibility of each resource mapped to new processes.	High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation). <u>Mar 24</u>	
Actions:	4.1 Produce a development management manual document all processes including any revisions identified through a review of workflows. <u>Success = Development Management Manual created</u> 4.2 Through appraisals make all employees aware of roles and responsibilities within the team and approved processes. <u>Success = Awareness of roles and responsibilities addressed in staff appraisals</u>		<u>June 2024</u> <u>November 2023</u>	AS

Outcomes: a) Empowerment and responsibilities consistent with post holders b) Effective use of resource c) Appropriate distribution of workload				
R5 - Continue to review processes as part of 'business as usual'.	Often improvement work can become a one-off project. Fylde planners are embedding process reviews as part of their regular team meetings. This creates opportunities to streamline and improve processes. The focus should be on	Review workflow of all aspects of the service (external support/delivery). Review role & responsibility of each resource mapped to new processes.	High – essential to address long-term customer service issues (speed, clarity, comms,	

	reducing double-handling/protracted sign-off procedures and addressing validation issues. See also Recommendation R8. (Paragraphs 8.7)		engagement & reputation). Mar 24	
Actions:	5.1 Embed process review in team meetings including documentation of improvement actions that are implemented via updates to Development Management Manual. Success = Staff feedback on processes regularly features in Team Briefing and feedback on suggestions provided		June 2023	AS
Outcomes: a) Empowerment and responsibilities consistent with post holders b) Effective use of resource c) Appropriate distribution of workload				
R6 - Reduce the reliance on Extensions of Time (EoTs).	Linked to Recommendation R5 A key outcome of service improvement work should be the reduction of Extensions of Time (EoT). EoTs often result in a build-up of applications without a decision. This has a negative effect on the customer experience and service. (Paragraph 8.4.2)	Review workflows of each aspect of the service (external support/delivery).	High – essential to address long-term customer service issues (speed, clarity, comms, engagement & reputation). Sep 23	
Action 6:	6.1 Review reasons for extensions of time (EoT). Success = EoT Review completed		September 2023	MDE/AS
	6.2 Review process to avoid EoT that do not add value. Success = EoT process reviewed, reason for EoT documented, annual review of reasons for requesting EoTs in place		March 2024	
	6.3 Benchmark Fylde’s use of EoT against other Lancashire authorities Success = Use of EoT by other Lancashire Authorities completed		March 2024	
	6.4 Seek feedback from agents on use of EoT. Success = Feedback from agents received		December 2023	
	6.5 Introduce a performance indicator that measures use of EoT’s Success = Performance measure for EoT’s introduced and reporting (see Action 6.2) in place		April 2024	
Outcome: a) Unnecessary E xtensions of time reduced				
R7 -- Work through the PAS Development Management (DM) Toolkit. As part of	Linked to Recommendation R6 above. The toolkit provides a series of improvement challenges for the development management service. It includes ideas for what an ‘excellent’ DM service looks like. to This could complement	Toolkit can inform workflow review work and used as an ongoing measure – included as service plan action.	Medium – initial generic ideas for process improvement then longer-term guide.	

<p>ongoing process and service improvement work.</p>	<p>a service improvement plan and ongoing process improvement work. <i>(Paragraph 8.8)</i></p>		<p>Jul 23</p>	
<p>Actions:</p>	<p>7.1 Complete review of Development Management process utilising PAS toolkit to inform workflow review <i>Success = PAS DM Toolkit evaluation completed</i></p>		<p><u>July 2024</u></p>	<p>MDE/AS</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Toolkit applied to inform process review best practice b) Toolkit embedded as a measure of performance for development management 				
<p>R8 - Produce a Planning Service Plan that has clear and direct links to the corporate priorities</p>	<p>The Planning Service needs a clearer sense of its own objectives and priorities. These need a direct link-linked (“golden thread”) to the corporate priorities. This will allow so officers to can better allocate their limited time. The staff appraisal process should provide a clear link back to the service plan. An outcome focussed service plan will build upon the good work that the Service is already delivering and including service standards will help reflect the more pro-active approaches to customer service that the council desires. <i>s-required(Paragraph 8.9)</i></p>	<p>The ‘Golden Thread’ principle is required in all service plans, post pandemic there will be a review of corporate service planning.</p>	<p>Medium – to be embedded as part of the corporate process linking individual outcomes to the Corporate Plan through service planning. May 23</p>	
<p>Actions:</p>	<p>8.1 Produce a service plan for the planning service in line with revised corporate procedures and template, linked to the corporate plan objectives and appraisals to establish ‘golden thread’ from individual to corporate outcome <i>Success = Planning service plan produced</i></p>		<p><u>August 2023</u></p>	<p>Management Team</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Planning service objectives and actions linked to corporate priorities b) Appraisals linked to ‘outcome focused’ service plan c) Proactive approach to customer service. 				
<p>R9 - Provide additional investment in the planning service to bring it up to date with the technology and cyber-security needs of a modern planning service.</p>	<p>Officers need to be confident in the new back-office IT system. It needs investment to get it fully functioning. There is presently a potential data-gap risk in the system. There are also processes and technology that need updating. This includes access to digital plans, telephony, and web-access kit available off-site. Some staff use their own technology; this represents a potential data-security risk.</p>	<p>Review the use of the computer system and link to workflow review – new processes driven by the technological capability. Benchmark best practice with other users of the same system. Provide the required technology.</p>	<p>High – will be integral to a review of workflow with technology reducing waste, duplication, and human input wherever possible = efficient.</p>	

	(Paragraphs 8.11, 8.12)		Jul 23	
Actions:	9.1 Review & invest in the technology used to deliver the service (R3/R4/R5/R6/R9), <u>Success = IT review completed.</u>		April 2024	AO/MDE/AS/JG/RMcK
	9.2 Identify opportunities for development of recently introduced DEF software. / <u>Success = DEF improvements identified and a programme of improvements in place.</u>		April 2024	
	9.3 Deliver identified improvements to Geographical Information System Software (GIS) / <u>Success = Programme of GIS improvements in place including integration with DEF.</u>		April 2024	
	9.4 Develop staff to utilise digital upgrades./- <u>Success = Staff training and development completed.</u>		April 2024	
	9.5 Explore options for a development plans module./- <u>Success = Need for development plans module reviewed and actioned as appropriate.</u>		December 2024	
	9.6 Secure resources necessary to support investment in software development. /- <u>Success =Review of IT resource requirement complete and resources secured.</u>		April 2024	
	9.7 Roll out of cloud telephony service./- <u>Success =All staff have access to cloud telephony.</u>		March 2024	
	9.8 Roll out of laptop/tablet/managed device to team./- <u>Success = All staff have access to managed devices.</u>		June 2023	
	9.9 Develop working practices to incorporate mobile working. <u>Success = Mobile working solutions reviewed and adopted where appropriate.</u>		March 2024	
Outcomes:				
a) Technology maximised and used efficiently to deliver the service				
R10 – Establish an Agent’s/Developer’s forum, with an external chair	A Developer Forum will help communication between the Planning Service and its customers. <u>A Forum allows enabling the</u> discussion /resolution of issues. <u>All can agree on</u> a specific and timetabled number of issues / standing items to work on <u>and co-produce</u> . <u>These arrangements is</u> requires year-on-year commitment to work well. Consider various formats that work for all involved and encourages attendance and engagement. (Paragraph 8.14)	<u>Key method of stakeholder engagement that needs to be in place.</u>	Medium – Review of workflow should release capacity to plan and manage a dedicated forum, corporate support will be provided. <u>Sep 23</u>	
Actions:	10.1 Seek views from regular agents regarding the preferred forum for engagement (including frequency, joint LA forums, time of day) <u>Success = Views of regular agents on establishment of a forum received</u>		December 2023	MDE/Corporate
	10.2 Subject to outcome of action 10.1 establish agents’ forum with independent chair <u>Success = Agent’s forum established with independent chair (subject to desire of agents)</u>		July 2024	
Outcomes:				
a) Agent & Developer Forum established and engagement in place.				

<p>R11 - Enforcement priorities and protocols need to be made clear.</p>	<p>Members and town/parish councils Stakeholders are unclear about how enforcement works and why some things are not considered important enough to enforce. The service needs to help stakeholders understand the process, the priorities, and the practicalities of carrying out enforcement action so that expectations are clear and can be managed. <u>The service should Refresh and make available publish</u> the Enforcement Policy statement, setting out what types of planning breach are a high priority and what options there are to resolve breaches.</p> <p><u>(Paragraph 8.15)</u></p>	<p>Policy reviewed, repackaged, and published with case study / examples.</p>	<p>Medium – work already in progress can be quick win.</p> <p>Jun-23</p>	
<p>Actions:</p>	<p>11.1 Refresh of the enforcement policy and process when a breach occurs that is approved through new governance arrangements from May 23</p> <p><u>Success = Enforcement policy reviewed and considered by Executive Committee</u></p>		<p><u>March 2024</u></p>	<p>MDE/AS/KH/AR</p>
<p>Outcomes:</p> <p>a) Enforcement policy published.</p> <p>b) Approach to enforcement understood by all stakeholders.</p>				
<p>R12 - Optimise the council's webpages as an engagement tool and promote it as such.</p>	<p>The council website can provide service users with up-to-date information on planning applications. The website is not used by agents as much as it could be. Keeping it up to date and relevant, will drive more traffic to it and away from planning officers. It needs to be promoted to agents and customers.</p> <p><u>(Paragraph 8.16)</u></p>	<p>Overhaul of planning web pages required at Fylde. Ongoing resource / digital links from planning system to keep pages dynamic and relevant for users.</p>	<p>Medium– online should be first point of contact wherever possible avoiding need for human input for straight forward / transactional elements of the service.</p> <p>Dec-23</p>	
<p>Actions:</p>	<p>12.1 Review <u>(and continue to review)</u> general content of planning pages to ensure up to date and relevant <u>Success = Content of planning web pages reviewed and updated</u></p>		<p><u>April 2024</u></p>	<p>MDE/AS/JG/ST</p>
	<p>12.2 Benchmark information against other authorities <u>Success = Review of other local planning authority web pages completed</u></p>		<p><u>March 2024</u></p>	
	<p>12.3 Promote interactive elements of website (application progress monitoring, need for planning permission) <u>Success = Interactive pages promoted through website/social media and regular communication with stakeholders</u></p>		<p><u>April 2024</u></p>	
<p>Outcomes:</p> <p>a) Updated website that is relevant, informative, and user-friendly.</p> <p>b) Website and digital channels used by stakeholders, especially agents/applicants.</p>				

<p>R13 - Committee practices and procedures should be kept under review. This will ensure an ongoing, open, and engaging experience for the public.</p>	<p>Planning Committee is the service's 'shop window'. It demonstrates how planning and place-shaping decisions are made. <u>The Fylde Planning Committee observed was exemplary in many ways (see Paragraphs 8.16-8.21).</u> There are 'continuous improvement' opportunities that will allow more time for the strategic, larger, and more contentious schemes. <u>Paragraphs 8.25 – 8.26 contain suggestions for items to keep under review, including:</u></p> <ul style="list-style-type: none"> • <u>A proportionate approach to the detail contained in officer reports and presentations. This will allow officers and members more time to focus on and debate the main issues.</u> • <u>Getting member's valuable input outside of the committee setting. e.g. in pre-app discussions, through technical briefings or developer's forums. Each well before an application comes to committee.</u> • <u>The boundary changes represent opportunities to broaden the planning experience and knowledge of a wider group of members.</u> • <u>Opportunities for junior case officers to gain experience by presenting at Planning Committee. This is also an opportunity to free up senior officer time.</u> • <u>Reviewing the application call-in terms. Resolve Parish /Town Council issues through discussion or the provision of information (rather than at committee).</u> <p style="text-align: right;"><u>(Paragraphs 8.10, 8.25)</u></p> <p><u>Recording and broadcasting the Planning Committee live will encourage a wider audience for planning decisions. This is standard procedure at most councils. It will help make the process much more transparent for stakeholders and communities. Having access to recordings can also serve as a good improvement and training tool.</u></p> <p style="text-align: right;"><u>(Paragraph 8.26)</u></p>	<p>Member and officer development of agenda- Review and monitor of procedures through governance group-</p>	<p>Medium – incorporate in current governance review for new council from May 2023.</p> <p>Dec-23</p>	
<p>Actions:</p>	<p>13.1 Review existing committee procedures, including frequency of meetings, time of day and live broadcast of proceedings, content of reports, introduction of technical briefings, broadening the range of officers presenting to committee, reviewing the application call in terms.</p> <p><u>Success = Full review of committee procedures completed, and recommendations implemented at next annual review of constitution</u></p> <p>13.2 Carry out review of committee practice and procedure at least annually.</p> <p><u>Success = Annual review of practice and procedure takes place</u></p>	<p><u>May 2024</u></p> <p><u>April 2024</u></p>	<p>IC/MDE/AS</p>	

	13.3 Review current scheme of delegation and arrangements for resolving town and parish council referrals ahead of committee meetings.		<u>February 2024</u>	
	<u>Success = Scheme of delegation reviewed and any revisions implemented</u>			
	13.4 Ensure members of the Planning and Executive Committees receive frequent appropriate training <u>Success = Annual member training programme in place</u>		<u>April 2024</u>	
Outcome:				
<ul style="list-style-type: none"> a) Live webcasting of planning committee meetings. b) Agenda developed by members/officers. c) Procedures monitored through new governance arrangement. 				
THEME: COMMUNITY ENGAGEMENT & PARTNERSHIP WORKING				
R14 - Introduce a more structured approach to obtaining and using customer feedback.	The Planning Service's approach to feedback should align with the corporate approach. The evaluation of customer feedback should form part of the performance reporting process, <u>Doncaster Council has</u> a customer feedback survey that goes out on individual decisions. <u>An agent/developer Forum is another way of obtaining customer feedback (see Recommendation R10).</u> <u>(Paragraph 9.9)</u>	Key stakeholder engagement being developed corporately for all customer facing services. Bespoke surveys carried out when feedback identifies specific issue.	Medium – in progress with the corporate co-ordinated survey across customer facing services. Quick win opportunity. <u>Sep-23</u>	
Actions:	14.1 Carry out regular (consistent to allow year on year comparison) customer feedback survey with assistance of corporate services team <u>Success = Annual customer feedback survey has been conducted</u>		<u>December 2023</u>	GB/ASc
	14.2 Document survey and ad-hoc customer feedback for inclusion to service update / improvement. <u>Success = All feedback collated and considered in annual service update</u>		<u>April 2024</u>	
Outcomes:				
<ul style="list-style-type: none"> a) Structured regular customer questionnaires/surveys b) Engagement with service improvements based on identified customer need c) Corporate approach to customer care incorporated into agreed processes. 				

<p>R15 - Take proactive steps to improving working relationships with Town and Parish Councils</p>	<p><u>Interaction with Town and Parish Councils is important. It helps ensure effective community interaction with the Planning system.</u> The need for better communication between the council and its communities is recognised. The council is keen to improve things. <u>The recommendations in this report will help improve customer service. The Peer Challenge process should also be a catalyst for:</u></p> <ul style="list-style-type: none"> <u>Providing training for council and Town/Parish Council Members.</u> 	<p>Training, forums, and workshops for parish representatives. Establish regular comms / updates through a review of workflow and tech use / web pages.</p>	<p>Medium – existing engagement is mixed in terms of outcomes; this will be built on and improved through a review of workflow releasing capacity and improving access.</p> <p>Jul 23</p>	
	<ul style="list-style-type: none"> <u>Facilitating community involvement early on in master planning, and/or through Neighbourhood Plans.</u> <u>Establishing a pro-active and structured approach to engaging with Town and Parish Councils.</u> A re-think is required to the purpose and outcomes of the current regular Town and Parish Council Forum alongside an annual training programme. <p style="text-align: right;"><u>(Paragraphs 9.11 – 9.13)</u></p>			
<p>Actions:</p>	<p>15.1 Review existing parish liaison group meetings with parish and town councils <u>Success = meeting arrangements for parish liaison groups has been reviewed</u></p> <p>15.2 Establish training plan for parish and town councillors following May 2023 election <u>Success = Town and parish council training plan in place</u></p> <p>15.3 Promote the opportunities available through neighbourhood planning <u>Success = Neighbourhood planning session with town & parish council's has taken place</u></p> <p>15.4 Review process for objections from town and parish councils <u>Success = Process for considering comments of town and parish councils has been completed</u></p>		<p>November 2023</p> <p>November 2023</p> <p>December 2023</p> <p>November 2023</p>	<p>TM/MDE</p>
<p>Outcomes:</p> <ul style="list-style-type: none"> a) Parish & Town Council liaison improved b) Relations with Parish and Town Councillors strengthened c) Opportunities for place-shaping increased d) Annual training programme delivered 				
<p>THEME: ACHIEVING OUTCOMES</p>				

<p>R16 - Review the approach to developer contributions.</p>	<p>Fylde does not operate the Community Infrastructure Levy (CIL) relying on Section 106 (S106) developer contributions. The Levelling Up & Regeneration Bill (LURB) has a provision for an 'Infrastructure Levy'. The Infrastructure Levy will operate similarly to CIL in that it will be for infrastructure requirements across the borough, rather than a site-specific S106 agreement (<u>it is also proposed that S106 may operate only on large schemes.</u>)</p> <p style="text-align: right;"><u>(Paragraphs 10.9)</u></p>	<p>Review policy to introduce Infrastructure Levy based on Levelling Up Bill— objective to achieve option for contribution to generic levy. Review co-ordination and management of developer contributions to include finance.</p>	<p>Medium – officers monitoring progress and outcomes from the Bill ahead of review and levy proposal.</p> <p>Subject to introduction of legislation</p>	
<p>Actions:</p>	<p>16.1 Implement the Infrastructure Levy contained in the Levelling up and Regeneration Bill once enacted by parliament</p> <p><u>Success = Infrastructure Levy has been successfully introduced in line with national legislation and guidance</u></p>		<p>Subject to introduction of legislation</p>	<p>MDE/JG</p>
<p>Outcomes:</p> <p>a) Infrastructure Levy implemented</p> <p>b) Monitoring and reporting of developer contributions published</p>				
<p>R 17 - Deliver the recommendations of the review/audit of Section 106 arrangements carried out in September 2022.</p>	<p>The Levelling Up & Regeneration Bill (LURB) is proposing changes to developer contributions. The way Section 106 operates may change. <u>As well as Recommendation R16</u>The council should also implement the recommendations of the Section 106 audit.</p> <p><u>The priority recommendations include:</u></p> <ul style="list-style-type: none"> • <u>continuity/resources (just one member of staff is currently involved in monitoring payments and spend)</u> • <u>better documented procedures</u> • <u>better monitoring of the collection and status of section 106 monies</u> <p style="text-align: right;"><u>(Paragraph 10.10)</u></p>	<p>Include the audit actions in the service plan, deliver quick wins, address any through a review of workflow and other actions from the PAS review.</p>	<p>Medium – audit actions published and will be matched with actions from PAS review to complement and avoid duplication.</p> <p>As targets in 106 action plans</p>	
<p>Actions:</p>	<p>17.1 Implement the 8 recommendations of the Sn 106 internal audit report</p> <p>procedural guidance, service level agreements Business Continuity arrangements Reporting of collection of 106 funds Approval affixation Approval status of agreements on website Listing of agreement svia website</p>		<p>April 2024</p>	<p>MDE/AS</p>

	<u>Spending of monies</u>			
	<u>Success = The 8 recommendations of the 106 Audit have been actioned.</u>			
Outcomes:				
a) Recommendations of Section 106 audit implemented				
b) Infrastructure Levy implemented				
R18 - Investigate how closer working relationships can be forged with the Housing Team.	Fylde’s Housing Team expressed a desire to work <u>more closely</u> with Planning to address <u>increased-a rapidly growing</u> homelessness <u>problem</u> . This is a corporate issue that links into the Borough’s Homelessness and Rough Sleeping Strategy 2020-2025. <u>(Paragraph 10.8)</u>	<u>Included in Heads of Service agenda as part of their remit to engage service areas more effectively, remove silos and duplication.</u>	Medium – ongoing role of Heads of Service through regular engagement, include as a bespoke connection that is required. Sept 23	
Actions:	18.1 Review need for affordable housing in the borough <u>through the completion of an Affordable Housing Needs Survey</u> <u>Success = Affordable Housing Needs Survey has been completed</u>		March 2023	MDE/JG/KR
	18.2 Review tenure of affordable housing required to address local issues and reduce reliance on temporary (B&B) accommodation <u>through revisions to the Affordable Housing Supplementary Planning Document.</u> <u>Success = Affordable Housing Supplementary Planning Document has been updated and adopted by the council</u>		April 2024 (subject to Scrutiny Review)	
Outcomes:				
a) Planning is embedded as a core service and part of the authority linked to other strategic services such as housing (homelessness).				

LEAD OFFICERS

<u>AO – Allan Oldfield</u> <u>Chief Executive</u>			<u>AS – Andrew Stell</u> <u>Development Manager</u>			<u>ASc – Alex Scrivens</u> <u>Corporate Performance and Engagement Manager</u>		
<u>CR- Charlie Richards</u> <u>Head of Regeneration and Projects</u>			<u>GB – Gemma Broadley</u> <u>Head of Corporate Service</u>			<u>IC – Ian Curtis</u> <u>Head of Governance</u>		
<u>JG- Julie Glaister</u> <u>Planning Policy Manager</u>			<u>KH – Katie Halpin</u> <u>Senior Planning Enforcement Officer</u>			<u>KR – Kirstine Riding</u> <u>Housing Services Manager</u>		
<u>MDE – Mark Evans</u> <u>Head of Planning</u>			<u>RMc – Ross McKelvie</u> <u>ICT Manager</u>			<u>ST – Sally Thompson</u> <u>Research and Information Officer</u>		

TM – Tracy Manning
Deputy Chief Executive

MONITORING FRAMEWORK

The overall effectiveness of the action plan in delivering improvement in the planning service will be judged, year on year, against the following performance indicators:

<u>Indicator</u>	<u>2022/23</u>	<u>2023/24</u>	<u>2024/25</u>	<u>2025/26</u>	<u>2027/28</u>
<u>Minor applications determined within 56 days.</u>	90.91%				
<u>Major applications determined within 91 days.</u>	98.02%				
<u>Other applications determined within 56 days.</u>	97.45				
<u>Average length of time (in days) to determine planning applications.</u>	TBC				
<u>Percentage of applications subject to an extension of time.</u>	43%				
<u>Number of complaints upheld by the Ombudsman.</u>	2 (of 4)				
<u>Percentage of planning appeals won.</u>	75% (6 of 8)				

DOCUMENT CONTROL

<u>Version</u>	<u>Date</u>	<u>Changes</u>
<u>0.1</u>	<u>March 2023</u>	<u>Draft improvement plan as considered by Planning Committee on 8 March 2023</u>
<u>0.2</u>	<u>August 2023</u>	<u>Amendments for consideration by Mini-Spotlight Review Scrutiny Panel</u> <ul style="list-style-type: none"> • <u>Full recommendation supporting text added and Context for Fylde deleted.</u> • <u>Deadlines adjusted, allocated to individual actions and "priority" changed to "Impact".</u> • <u>Indicators of Success and Monitoring Framework added.</u> • <u>Document control and page number footer added.</u> • <u>Lead Officer roles added.</u> • <u>Formatting updates.</u>
<u>0.3</u>	<u>August 2023</u>	<u>Mini-spotlight review Scrutiny Panel recommendations</u> <ul style="list-style-type: none"> • <u>Target dates reviewed and amended</u> • <u>Actions expanded to aid clarification</u> • <u>Quantum added to appeal performance target</u>

APPENDIX: PLANNING ACTION PLAN – PARISH CONSULTATION AND FEEDBACK – SCRUTINY RESPONSE

Respondent	Date received	Suggestions for improvements	Scrutiny Response
Cllr Karen Buckley	03 April 2023	<p>The recommendations in the action plan should be exactly those in the PAS Report. Please double-check they have been carried forward accurately, not simply in the headings but in the detailed narrative.</p> <p>The action plan should be strengthened by SMART targets.</p> <p>Continuous improvement processes and methodology needs to be embedded in this project from the outset so progress can be monitored and measured.</p> <p>It is not clear whether priority/deadline dates are for completion or commencement - please clarify.</p> <p>The new Internal Scrutiny Committee should be seized of this work at the outset to ensure member oversight, representation and transparency.</p>	<p>The Action plan was drafted to be read alongside the Peer Review Team's Final Report. The recommendations of the Peer Review Team have not been altered in the plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan. The action plan has been updated to include the full text.</p> <p>To allow monitoring of the implementation of the action plan, all actions now have a note to advise what success looks like. SMART Targets have been added to allow the overall impact of the action plan to be monitored.</p> <p>Continuous improvement opportunities are identified throughout the plan and specifically addressed in actions 5.1, 7.1, 9.1, 14.1 and 14.2.</p> <p>The action plan has been amended to make clear target dates are intended completion dates and to allocate them to each individual action rather than the recommendation.</p> <p>This report seeks to establish the delivery and monitoring of the action plan through the scrutiny process.</p>
(Former) Cllr. John Singleton JP	15 March 2023	<p>We have to be sure we don't make changes just for making changes sake. Or changing for the few people who have an issue with planning in general.</p> <p>This appears to be a knee jerk reaction when unfavourable comments are received from a few residents, councillors or outside bodies.</p> <p>As a member of Staining Parish Council of 23 years I have had many occasions to contact Fylde planning department which all have been dealt with in a very professional manner. I would not wish to change this level of communication. This level of customer satisfaction stems from the CEO.</p> <p>Please beware, sometimes we have to bold enough stand up to unwelcome perceptions.</p>	<p>Any changes to existing practice and procedure should be justified</p> <p>Any comments about the operation of the Planning Service need to be taken into consideration in the context of all feedback.</p> <p>Comment noted</p> <p>Any changes to existing practice and procedure should be justified</p>
Councillor Peter Collins	17 March 2023	<p>1. Overall - Suggest that improvement processes should be aligned to processes adopted for FBC continuous improvement processes, so that planning staff can adopt and be trained on best FBC practice</p> <ul style="list-style-type: none"> · Does not seem appropriate or acceptable to have High priority items with the only deadlines over a year away, nor clear what that means <ul style="list-style-type: none"> ○ Need to have interim milestones, monitoring, reporting and control. - How is this going to be done? ○ Not clear what Deadlines mean. When the recommendation is completed, or when started? · Overall Actions and Outcomes are not fully aligned, consistent or complete. 	<p>The invitation of the PAS Peer Review Team to review Fylde Council's Planning Service was made in line with the corporate philosophy of seeking continuous improvement.</p> <p>Target dates are based on the complexity of the changes proposed and as certain actions cannot be delivered until other actions are delivered. The plan has been updated to use the term "impact" rather than "priority".</p> <p>It is proposed that, following approval of the action plan by the Executive Committee, The Internal Affairs Scrutiny Committee will take ownership of monitoring the delivery of the action plan through a series of interim reports.</p> <p>Action plan amended to make clear target dates are intended completion dates and to relate to individual actions.</p> <p>The Scrutiny panel are asked to consider whether the action plan addresses all outcomes and they are consistent with the recommendations of the Peer Review Team.</p>

	<ul style="list-style-type: none"> The Outcomes are not specific, measured, time-bound. Use of words like "reduced", "improved", "used efficiently", "clarity", "synergy", "challenge addressed", "strengthened", "appropriate", etc. There are omissions and errors - I've only given an example of each below. The work needs a further review - suggest by the FBC Business Improvement team applying best business continuous improvement practice. <p>2. Vision & Leadership Theme e.g. R2 - Only part of PAS Summary is being addressed</p> <p>Strengthen the governance structure to give Planning earlier and better strategic oversight of major development schemes. Embedding Planning input much earlier in corporate projects will help promote planning as an enabler rather than a blocker to development. This will give senior leadership comfort that projects are moving forward positively. It will improve risk management and ensure processes and protocols are followed.</p> <p>The following has NOT been included from the PAS report recommendation or addressed - yet is a HIGH priority item due for completion by June 2023 <i>The governance arrangement could consist of 2 'Boards'. A Planning and Regeneration Board (officers) - this holds more operational / professional focused conversations across service areas. The other board operates at a strategic level. It focuses on bringing the politics and regional considerations together. The operational Board reports to the strategic Board. This ensures that political and strategic considerations feedback directly. This will help keep the Planning Service aligned with the political landscape. (Paragraphs 7.11 – 7.13)</i> <i>Planning should not work in isolation. It should be formally involved from the beginning so that solutions to planning issues are found in a timely manner rather than appearing as surprises later in the process. (Paragraphs 7.14 – 7.15)</i></p> <p>3. Service Delivery and Performance Management" e.g.</p> <ul style="list-style-type: none"> 3.1 Suggest that the links and interdependencies for "Service Delivery and Performance Management" theme recommendations should be clearly shown, to highlight how any overlaps, inconsistencies and gaps have been addressed. Also need to show how oversight and alignment from the Vision & Leadership Themes is being embedded in service delivery. 3.2 R3 and R5 outcomes seem to have been swapped 3.3 R3 proposal to get "independent consultant" to review, rather than using "business as usual" process of continuous improvement required at R5 	<p>The nature of certain actions cannot be quantified and will have to be assessed having regard to opinion and experience. Quantifiable actions have been added to the plan to allow monitoring and SMART targets added to measure the overall impact of the action plan.</p> <p>See below</p> <p>The action plan is placed before the Internal Affairs Scrutiny Committee for review. The action plan proposes the appointment of external consultants to review existing processes and make recommendations for improvement</p> <p>The Action plan was drafted to be read alongside the Peer Review Team's Final Report. The recommendations of the Peer Review Team have not been altered in the plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan. The action plan has been revised to include the full summary.</p> <p>Recommendations 3 and 5 are closely linked. The outcomes set out in the action plan are correct.</p> <p>Recommendation 3 refers to an initial review of process carried out by an independent consultant, whereas rec 5 refers to ongoing review as part of the continuous improvement process.</p>
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<p>Staining, Greenhalgh with Thistleton, Ribby with Wrea, Weeton with Preese and Westby with Plumpton.</p>		<p>On behalf of Staining parish council, I would like for comments made at the recent parish council meeting, to be noted by Fylde Borough Council. This is in hindsight of reading the published Peer review as distributed to the parish and town councils.</p> <p>In Staining Parish Council's experience (and mine as clerk to 5 parishes), we would like to endorse the superb work undertaken by its officers and management teams. The liaison between clerk and planning is key and from our perspective, could not be better! Requests are considered timeously, enquiries answered without delay and advice received, from a planning and unbiased perspective, when asked. Emails are answered out-of-hours by Mr. Stell, which is above and beyond and is so helpful, as PC meetings are convened in the evenings.</p> <p>There is always room to improve and develop systems, however, in my personal opinion and that of Staining, plus some other parishes I work with, a first rate job is being done</p> <p>Regards</p> <p>David John Kirkham</p>	<p>Comment noted</p>
<p>Little Eccleston with Larbreck Parish Council</p>		<p>Little Eccleston with Larbreck (LEwL) Parish Council discussed this matter at its meeting on Thursday 13th April 2023 and instructed me to provide the following response.</p> <p>In his capacity as the Chair of the Fylde District Parish Liaison group, our Vice-Chair Councillor Stead held a telephone call with Councillor Buckley (Fylde Council Leader) on Thursday 6th April and expressed his concern that the 'Draft Planning Action Plan' released to all Parish and Town Councils for them to review, is not (yet) of a sufficient quality for this to be a worthwhile exercise.</p> <p>To spend time on a detailed evaluation of this version of the 'Draft Planning Action Plan' - which does not correctly reflect all of the recommendations of the PAS Peer Challenge review team, which is absent of SMART objectives and which indicates a number of deadlines which are unlikely to be achievable - would not be the best use of the limited and valuable time that the Parish Councillors have available to spend on their duties</p>	<p>All recommendations set out in the action plan are as per the Peer Review Team's final report. In order to avoid unnecessary repetition, the commentary provided in the Final Report is summarised in the Draft Action Plan as the action plan is intended to be read alongside the Peer Review Teams' Final Report. The Action Plan has been amended to</p>

		<p>overall.</p> <p>Councillor Stead has been made aware that Councillor Buckley will be instructing the Fylde officer team to revisit the 'Draft Planning Action Plan', to rectify its current 'under-developed' format and to ensure that it is appraised by the Council's internal Scrutiny Committee at the earliest opportunity; in advance of it being re-circulated for review.</p> <p>Additionally, in advance of a further draft being circulated, we would ask that the following is considered and implemented:</p> <ol style="list-style-type: none"> 1. Communicating the Project Programme <ul style="list-style-type: none"> · Fylde BC's overall 'customer satisfaction' & 'performance improvement' programme should be circulated, along with confirmation of what methodology will be followed to arrive at a more 'developed' and SMART set of project objectives · That an explanation is provided as to how the document development and approval process will function 2. Engagement with the Town & Parish Councils as 'Customers' <ul style="list-style-type: none"> · Listen, Understand & Act – more awareness / recognition is required, that the T&PCs are 'customers' of Fylde BC and as such, deserved greater engagement from Fylde BC, in advance of the 'Draft Planning Action Plan' being produced (this was requested by Councillor Stead – as Chair – at the last meeting of the Fylde District Parish Liaison group, when the PAS review was discussed and this request was recorded in the minutes of that meeting) 3. Publication of all feedback received regarding the draft already circulated <ul style="list-style-type: none"> · Fylde BC should make all related feedback available to all the T&PCs, in the interest of transparency · Fylde BC should confirm how it intends to act upon the feedback received <p>Therefore, considering all the points and requests made above, LEwL reserves the right to provide a more detailed and comprehensive response to Fylde BC, once a more developed and accurate further draft has been formulated and released to all Parish and Town Councils.</p>	<p>include the supporting text as set out in the final report. Certain actions could be supported by SMART Targets, whilst the nature of other actions, would not be appropriate for SMART targets. SMART targets have All deadlines have been reviewed as part of the scrutiny process to ensure they are achievable.</p> <p>It is proposed that scrutiny of the action plan will be carried out via the Internal Affairs Scrutiny Committee in order to ensure the recommendations have been appropriately addressed, to ensure that the scrutiny process is transparent and to ensure that the action plan addresses the full spectrum of service users, before it is placed before the Executive Committee for final approval.</p> <p>SMART targets have been incorporated to allow the impact of the plan to be assessed</p> <p>The development of the Action Plan is documented via various reports to relevant committees</p> <p>The Scrutiny process is designed to allow appropriate engagement with all stakeholders. Town and Parish Councils were specifically provided with an opportunity to comment on the draft plan and their comments considered by way of this scrutiny process.</p> <p>This schedule (alongside previous iterations) contains a record of all written feedback that has received.</p> <p>This will be addressed via the scrutiny process.</p>
<p>St. Annes on Sea Parish Council</p>	<p>22 March 2023</p>	<p>PAS Review of the Fylde Planning Service and resultant Action Plan</p> <p>Thank you for the opportunity to comment on the action plan for the Fylde Planning Service.</p> <p>As you know I have dedicated officer time to support our Planning Committee in their deliberations as a consultee in the planning process. Add to that a relatively high number of applications to consider (as St Anne's is the largest town in Fylde) and our own Neighbourhood Plan we are, I would suggest, in a better position than many parishes to provide balanced comment.</p> <p>I should mention that several of my planning committee members are also on the Planning Committee at Fylde as they represent wards for both our authorities. The remainder are also well versed in their understand of planning process.</p>	<p>Noted</p>

		<p>In wider comment the action plan appears to address main findings of the peer review; those matters which are more inward looking for Fylde Council are not necessarily for us to comment upon. That said St Annes on the Sea Town Council would welcome any actions that seek to improve the interface and engagement with the planning process generally.</p> <p>My colleague Darrel acts as Committee Clerk for our Planning Committee and has a very good working relationship with all the planning staff at Fylde. They are always receptive to any queries and respond promptly.</p> <p>Turning to the action plan;</p> <p><i>R12 Optimise the Council's webpages as an engagement tool</i></p> <p>One area that we, as officers here at the Town Council, have wanted from the Planning Portal is for us to be able to input our stakeholder comments directly. At present my officer must type out all our responses which are then emailed to both the generic planning email address and the individual planning officers. I presume someone in the Planning office then has to either re-type or upload our comments to the Portal. The ability to remove double keying would be a quick win here.</p> <p><i>R15 Taking steps to improve working relationships with town and parish councils</i></p> <p>This recognises the need for the different tiers to work as closely as possible. As mentioned we are in the fortunate position to have a good working relationship with the Planning Service. Anything that might be a little more contentious is usually handled by the Service Manager directly.</p> <p>If we can assist with the reviews relating to parish liaison meetings and the process for objections please ask.</p> <p><i>R16 Review the approach to developer contributions</i></p> <p>This is certainly an area where the Town Council would have an interest. Having an adopted neighbourhood plan was, we hoped, a catalyst for us to receive much needed funds for many projects in the town. In the absence of CIL we have had to rely on a small share of top sliced New Homes Bonus monies. Whilst this money was welcomed it would not have been at level we would have received through CIL bearing in mind new build numbers in St Annes over the past years.</p> <p>With the action point is to review the policy based on the Levelling Up Bill I would ask that town council and parish councils are considered to make sure there is provision for them to receive funds from the Infrastructure Levy.</p> <p>As mentioned if we can assist you in any way with the implementation of the action plan please contact me.</p> <p>One further point, with the impending elections I will not know until mid-May whom Council will appoint to our Planning Committee. With at least 2 of the 5 existing councillors not standing again I will likely have some councillors without experience of the planning process. The training being suggested as part of the action plans will be both welcomed and appreciated.</p>	<p>Noted</p> <p>It is proposed that this functionality will be rolled out as part of the IT software upgrade referred to in Action 9.2.</p> <p>Noted</p> <p>Noted</p> <p>The funding of essential infrastructure will be reviewed as the new national legislation and guidance emerges. This is reflected at Action 16.1.</p> <p>Initial Induction training has been provided for all town & parish councils, with more specific training modules to be rolled out on a regular basis as per Action 15.2</p>
<p>Treales, Roseacre & Wharles Parish Council</p>	<p>14 March 2023</p>	<p>1. Introduction</p>	

	<p>a) In our view the distributed Action Plan document remains at a low level of development maturity. It requires considerably more work to be considered as an effective, efficient, and economic deliverable plan to fully meet the requirements of the PAS Review Report.</p> <p>b) It is not immediately clear to us why it has been distributed externally to the Fylde Parish & Town Councils (P&TCs) and presumably the FBC Planning Function's other customers and stakeholders in a preliminary state. An explanation would be expected as this appears to be an inefficient use of the commenters time, since it is apparent that the document will already require substantive change.</p> <p>c) Given that it appears to still be under development, it is also not clear how the PAS review customer satisfaction and performance improvement response action plan is being integrated within the FBC's continuous improvement methodology and governance framework. Notably, the document does not contain any statement of its purpose, its scope, nor how is it be used.</p> <p>2.Overview of Corrective Actions to Address the Issues in the Distributed Action Plan</p> <p>The following observations and proposals are made:-</p> <p>a) The Recommendations in the distributed Action Plan are not as would be expected to be exactly & fully as those in the PAS Report</p> <p><i>i.</i> There are multiple recommendations that have omissions & resultant revisions, As a particular example, this notably includes the recommendation relating to P&TC working relationships (R15). It is not clear with what governance authority, effort has been consumed: to apply almost subtle grammatical changes; to make changes of terms that change the scope or tone; or to omit complete statements or multiple paragraphs.</p> <ul style="list-style-type: none"> ▪ Every Recommendation fails to carry over the references to the relevant PAS report paragraphs which give the important context of the recommendations. ▪ Of the 18 PAS recommendations, there appears to be only two that have been otherwise copied over into the FBC Action Plan without some form of change. ▪ There are then 10 recommendations that may be considered to have changes to material points and a further 4 that have major sections of text omitted or changed. <p><i>ii.</i> Correcting all the omissions and revisions would then impact on the nature of the objectives, actions, resources, interdependencies, timescales etc. This will materially change the content of the Action Plan.</p> <p>b) The Action Plan should be strengthened by SMART targets</p> <p><i>i.</i> The outcomes in the distributed Action Plan are not specific, measured, nor time bound. It is not clear that they are achievable or adequately relevant. Use of words like "reduced", "improved", "used efficiently", "clarity", "synergy", "challenge addressed", "strengthened", "appropriate", etc. are not sufficient to measure nor manage progress.</p> <p><i>ii.</i> The application of the "SMART" approach (or the FBC best practice corporate equivalent) will have a material impact on the flow down of actions, resources, interdependencies, and timescales. This will materially change the content of the Action Plan. It can be expected to improve its effectiveness, efficiency, and economy.</p>	<p>It is intended that the action plan will be developed through the scrutiny process. Feedback from the lead of the Peer Review Team has confirmed that they consider the Action Plan addressed their findings.</p> <p>The document was distributed at the request of the Planning Committee to ensure Town & Parish Councils could comment on the emerging document and so be involved in its development.</p> <p>The purpose of the action plan is to respond to the recommendations set out in the Final Report of the PAS Peer Review Team and the scope is defined by the recommendations of that team whose scope was, in turn, established by the planning committee.</p> <p>The Action plan has been drafted to be read alongside the Peer Review Team's Final Report. The recommendations of the Peer Review Team have not been altered in the action plan, but in order to avoid unnecessary repetition, the commentary provided in the Final Report was summarised in the Draft Action Plan. The full explanatory text has now been incorporated into the action plan.</p> <p>The full supporting text for each action has now been added to the action plan.</p> <p>The full supporting text for each action has now been added to the action plan</p> <p>All deadlines included in the action plan have been reviewed. It should be noted that the priorities and deadlines set out in the action plan are established by the action plan and not the Peer Review Team.</p> <p>Each action now has a target date. These have been reviewed having regard to the scrutiny timetable and clarified as completion and not start dates. Whilst some SMART targets can be introduced, many of the outcomes will be based on perceptions of the process and are not, therefore, appropriate for SMART targets. Some priorities are</p>
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	<p>c) It is not clear whether priority/deadline dates are for completion or commencement</p> <p><i>i.</i> The priority/deadline dates as stated are such that it is not clear whether they are supposed to represent completion or commencement. This needs to be clarified in each case and it to be transparent as to how that has been determined.</p> <p><i>ii.</i> Any assessment of interdependencies between recommendations, subsidiary objectives, resources, or actions that might impact timescales is not apparent to support extended deadlines. This should be corrected.</p> <p><i>iii.</i> It does not seem appropriate or acceptable to have "High Priority" items with the only deadlines specified being over a year away. It is suggested that there need to be interim milestones, monitoring, reporting and control points. It needs to be explained how this is going to be done?</p> <p>d) At variance to PAS, the distributed Action Plan seems to propose the seemingly unnecessary extra costs of commissioning external consulting contractors</p> <p>It is noted that the distributed Action Plan proposes that an independent consultant will be appointed at Action 3.1. The Performance Improvement & Engagement function has stated that FBC "will be commissioning independent consultants to process and re-engineer every aspect of the service...". The proposed scope articulated in both these statements seem to go far beyond that identified by the PAS. As such, this type of updating activity would be expected to already be very much the "day job" of a "continuous improvement" engaged organisation and the economic argument for appointing external contractors is not apparent. This is in accord with the observations made in PAS recommendations 5, 8 and 7.</p> <ul style="list-style-type: none"> • Fylde residents and Council Leaders of an employer have paid for people to provide – on our behalf - a planning & development management service to be proud of. • The customer satisfaction feedback collected by FBC has indicated that the FBC Planning Function has consistently not achieved the same level of positive feedback as that of other FBC services. • The previous and latest PAS reviews have identified and confirmed a series of underlying drivers. • As advised by the FBC CEO, the latest PAS review has confirmed that the FBC Planning Function is sufficiently resourced to perform its required function and improvements. • The recent FBC reorganisation - involving the separation of Regeneration and Housing functions from Planning - logically supports freeing up senior management capacity to further address improvements in the Planning Function. 	<p>dependent on wider pieces of work, whilst others will be seen as "quick wins". The priority reflects the impact of the changes will have on the improvement of the service rather than a time frame for delivery and so the terminology has used in the action plan has been amended. SMART targets have been included to allow the overall impact of the plan to be assessed.</p> <p>Deadlines are intended to be completion dates and the action plan has been revised to make this clear.</p> <p>Deadlines have been amended to reflect the scrutiny process.</p> <p>Terminology has been amended to reflect impact rather than priority</p> <p>The PAS Peer Review Team Report leaves the implementation of the recommendations to Fylde Council.</p> <p>The action plan proposes an initial external review of processes followed by a process of continuous review, which is proposed to be carried out internally. Fylde's internal team have confirmed that they do not have the capacity to be able to carry out such a review within the time frames envisaged.</p> <p>The Planning Service needs to address a wide range of customers needs.</p> <p>It is not appropriate to compare the customer feedback to other services. A year on year comparison that measures improvement is more appropriate. It is not considered appropriate to compare different services delivered by the council. A more appropriate metric would be to compare customer satisfaction with that of planning functions administered by other authorities.</p> <p>In addition to removing Regeneration and Housing from the responsibility of the Head of Planning to assist capacity, the role of Director of Development has been removed.</p>
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	<ul style="list-style-type: none"> • The FBC Statement of Accounts and the FBC Performance Improvement & Engagement Manager have articulated the substantive investment already made by FBC to provide the internal capability to deliver continuous performance improvement. • The senior & management levels of FBC Planning Function staff & members have been in post for many years. In most cases since before the last two recent PAS reviews and therefore would be expected to be knowledgeable of their roles and requirements. The latest PAS review did not identify a lack of knowledge within FBC. • The previous 2012 PAS report did note (para 14) that: <i>"A can-do attitude to improvement (owned and driven by the highest levels of the organisation) needs to replace the culture of dependence on external input. Fylde must 'own' its improvement journey and this should be driven from the highest level of the organisation."</i> <p>It is therefore suggested that FBC may wish to consider that the proposed extra cost of commissioning external resources is avoided.</p> <p>(1) This would be achieved by FBC utilising its already paid for investment in Continuous Improvement to enable the FBC Planning Function personnel cadre to own & build the capability of the FBC Planning Service and so deliver best practice levels of customer satisfaction & performance.</p> <p>(2) This will also demonstrate lean practice at a FBC level, supporting residents by avoiding committing unnecessary costs in this current "Cost of Living Crisis"</p> <p>e) To ensure effective, efficient and economic best practice is deployed; the FBC Governance Framework with FBC's, continuous improvement processes and methodology need to be embedded in this project from the outset</p> <p><i>i.</i> The FBC Planning Function's Customer Satisfaction and Performance Improvement Programme should be utilising the FBC: Governance Framework; continuous improvement processes & methodology; and common way of working from the outset. This will facilitate that applicable best practice learning from other FBC functions can be readily transferred and adopted. It will also enable effective and efficient programme monitoring, measurement, and control.</p> <p><i>ii.</i> It is unclear whether the flow down from the recommendations is currently matched consistently and completely by the actions & outcomes, priorities, and deadlines. Transparency of the methodology used would assist in the affirmation of that or otherwise. This should also cover interventions for implementing monitoring, control, and training. There will be substantive changes to the Action Plan in Recommendations, Outcomes and Objectives in response to the other feedback in this document, which have consequential changes in the rest of the content of the Action Plan.</p> <p><i>iii.</i> There should be continuity of effective oversight, with a smooth transition and then enhanced performance through the governance framework as FBC moves to its new organisation with reduced member numbers. The new Internal Scrutiny Committee will be an important function from the outset, to ensure member oversight, representation, and transparency of effective governance.</p> <p>3. Next Steps</p> <p>a) Response to Distributed Action Plan request for comments</p>	<p>Noted</p> <p>Noted</p> <p>The Parish Council's opposition to the appointment of independent advisors is noted and the Scrutiny Committee is asked to consider the approach set out in the draft action plan.</p> <p>This would require a review of the existing workload and priorities of the corporate team to ensure they have capacity to carry out the review internally as they have advised they do not have the capacity to carry out this work at present.</p> <p>Inviting a team of peers to review the planning function of the council was part of the process of continuous improvement in line with the council's continuous improvement objectives.</p> <p>The initial scrutiny of and ongoing monitoring of the delivery of the action plan by the Internal Affairs Scrutiny Committee will help provide transparency. The Peer review team have confirmed that they consider the draft action plan addresses their recommendations.</p> <p>The Scrutiny Committee will be overseeing the development and monitoring the delivery of the action plan.</p>
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	<p><i>i.</i> It is requested that the FBC Planning Function publishes the full feedback they've received as a result of the distribution of this Action Plan and how they are going to act upon all aspects of it.</p> <p><i>ii.</i> This review has not sought to comment on the detailed content of this distributed Action Plan due to its preliminary state and that given the required changes, commitment of further time would be essentially of no value. When it is clear how the programme is to be governed and customers engaged, it can then be collaboratively determined how best the maturity of the programme can be assessed on an ongoing basis.</p> <p>b) Communicating the whole programme and how that is to be managed.</p> <p><i>i.</i> Before the next draft is developed & issued, the overall Planning Function Customer Satisfaction & Performance Improvement Programme should be issued. This will, show the links to the methodology & governance process to be followed. This should include the document development & approval process.</p> <p>c) Engagement of the P&TCs as customers</p> <p><i>i.</i> DPLM agenda and attendee time was invested in receiving updates on the PAS Review. Feedback was offered and recorded in the meeting notes. It is not known how that was acted upon by FBC staff. At variance to the feedback, the subsequent activity appears to have been the distribution of a preliminary draft of the FBC Action Plan on 13th March requesting comments, but with the multiple issues described above, without explanation.</p> <p><i>ii.</i> It is requested that FBC adopts an effective "Listen Understand & Act" customer satisfaction improvement engagement cycle, or its FBC corporate equivalent for the FBC Planning Function. This is rather than just sending out yet another draft, which may otherwise give the unfortunate impression of it simply being a token engagement tick box exercise.</p> <p>d) Declaration of Senior Leaders' and Co-Sponsors' Programme Intent</p> <p><i>i.</i> To offer some bolstering of confidence in the full delivery of the required improvements, the co-sponsors may wish to issue a statement of senior leaders' intent to clarify what the Planning Function's Customer Satisfaction and Performance Improvement Programme might mean for all planning staff, customers, and stakeholders.</p> <p><i>ii.</i> an example of such a statement might be something like :- The Programme Sponsors' and Senior Leaders' intent is that :</p> <p><i>FBC will provide a Planning Service to be Proud of By All.</i></p> <ol style="list-style-type: none"> <i>1. It will demonstrate levels of customer satisfaction & performance in line with the best of FBC's other services by September 2023 and demonstrate national levels of that best practice by June 2024.</i> <i>2. This will be achieved by fully utilising FBC's common way of working and continuous improvement framework aligned to FBC's values within the FBC Governance Framework.</i> <i>3. The development and full delivery of the PAS Review & its Recommendations is one step in that improvement journey.</i> 	<p>This will be achieved via this schedule and the scrutiny process and is included in this schedule.</p> <p>The Scrutiny Committee on 20 June 2023 resolved to review the Action Plan via a mini spotlight review and refer the outcomes to Executive committee for consideration. The timetable for the development of the Action Plan does not currently allow for further consultation on the plan itself. Further engagement is, however, likely to take place to inform the delivery of certain actions, e.g. the establishment of the District/Parish Planning Liaison Meetings.</p> <p>The methodology and governance process is set out in the relevant background reports.</p> <p>The action plan is intended to act as an overarching framework that addresses the recommendations set out by the Peer Review Team.</p> <p>The action plan incorporates proposals to deliver a formalised feedback process that will document responses to suggested service improvements. The town and parish councils have been actively engaged in the process (both through being invited to make representation to the Peer Review Team and asked for comments on the Draft Action Plan.</p> <p>This will need to be addressed when the action plan is considered by the Executive Committee.</p> <p>As commented above, due to the nature of the planning service it is not considered appropriate to judge the customer satisfaction of the planning service against that of other services.</p> <p>The delivery of the action plan is part of the process of continued improvement.</p> <p>Noted</p>
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		It is hoped that this feedback is useful. It is intended to be a constructive contribution to assisting the FBC Planning Function to reach its full potential of delivering best practice customer satisfaction and performance, to be a <i>Planning Service to be Proud of by All</i> . If you have any queries, please just get in touch.	
Freckleton PC	22 April 2023	<p>Our thanks for the opportunity to make comments on the proposed action plan. There are several observations that should be considered before finally agreeing this proposal, as follows:</p> <p>1) Consideration of Planning as an Integral Part of the Development Process Planning is a key process that should be undertaken prior to any commencement of ground works on a development. It is Planning that provides the integration of all requirements to permit a successful development outcome.</p> <p>It is essential that the process establishes all the project requirements at a sufficient level of detail and records these in a traceable fashion from the outset.</p> <p>It should establish the constraints on any development, which includes an assessment of the capabilities of existing infrastructure – drainage – both for surface water and sewage, utility supplies – capacities and routes, public rights of way, special provisions associated with protected areas, and other such considerations.</p> <p>It should define the controls to be applied and by which the development will be regulated.</p> <p>It should not generate requirements on major issues for conditions to be fulfilled at a future date or that cannot/will not be enforced.</p> <p>In the case of “High Risk Buildings” – currently defined in terms of multi-storey developments, but soon to be expanded to include flood plain developments, a “designated development owner” will be required to ensure all the components are in place and subsequently built to the necessary standards before a development can be signed off prior to use. This leads to consideration of the need for management plans to achieve all these requirements.</p> <p>The Planning activity has to work in conjunction with Building Control, which is the mechanism for ensuring the plan is executed properly, or revised by recorded agreement where the build shows the plan to need modification or appropriate standards have not been met.</p> <p>Only when the reconciliation of the Design (Plan) and the Build is complete should the development be signed off as complete and fit for use for the intended purpose. For HRBs, as an example, this will require a designated development “owner” to complete this work and who then assumes responsibility for maintaining the standards throughout the life of the development. Failure to do this will, in future, invalidate insurance of the facility in question. The responsibility for such developments will exist throughout the development life until the use ceases and the development removed.</p> <p>2 Implications of the Proposed Planning Service Review Action Plan</p> <p>The following comments on the Action Plan Recommendations result from the considerations described above.</p> <p>R1 The issue here is that the recommendation is perhaps sensible, but the mode of operation between the two bodies is not adequately defined in terms of top-level responsibilities. The issue certainly relates to the comments made under section 1, above, in that it defines the overall constraint mechanisms and objectives to which Planning and Building Control must respond.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>This will need to be addressed in establishing the terms of reference for these bodies.</p>

		<p>R3 Delegation amongst a greater number of staff is a good idea, but those staff need to have the necessary training and experience to establish the competence levels required. Some form of professional registration should be demonstrated by such staff. Care is required with external consultants – experience shows they bring out what the staff already know and could contribute if they were listened to by management. Often the consultancy is expensive and fails to address the real issues – especially in public sector working.</p> <p>R5 Ensure all staff are familiar with and apply the approved processes correctly. Allocate specific time each week for looking at process improvement and encourage and allow the team to develop the ideas themselves. The key to success is do it right, do it once.</p> <p>R6 Experience shows that time spent up front to get the process right and ensure all necessary requirements are identified saves time overall.</p> <p>R9 Ensure this investment addresses cyber-security aspects.</p> <p>R11 Only apply conditions on planning that can/will be enforced. This goes back to establishing requirements at the outset and not permitting starts of physical work too early in the overall process. Too often, conditions have been imposed for subsequent work that cannot be implemented retrospectively – there are several existing plans where this has been the case.</p> <p>R15 Make better use of local knowledge especially of existing infrastructure and the likely capacity issues.</p>	<p>Any staff authorised to issue decisions would need to be suitably qualified/experienced.</p> <p>Noted</p> <p>Noted and to be incorporated into the proposed staff training improvements.</p> <p>Noted and to be addressed via Action 9.1.</p> <p>This process is established through national planning legislation and guidance.</p> <p>Improved communication with town and parish councils should ensure efficient transfer of this knowledge.</p>
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DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
HEAD OF PLANNING	EXECUTIVE COMMITTEE	17 OCTOBER 2023	7
FLOODING, WATER MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS SUPPLEMENTARY PLANNING DOCUMENT - ADOPTION			

PUBLIC ITEM

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

RELEVANT LEAD MEMBER

This item is within the remit of Lead Member for Corporate and Economic Development (Councillor Karen Buckley).

PURPOSE OF THE REPORT

The Flooding, Water Management and Sustainable Drainage Systems SPD (Appendix 1) gives the Council support in its implementation of Policies GD7, CL1 and CL2 of the Local Plan, by providing guidance on flood risk and the location of development, managing and mitigating flood risk, sustainable drainage systems and water quality and pollution control.

The Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD has been revised from the draft version having regard to representations received during the consultation. The Summary of Responses (Appendix 2) gives details of the representations made to the consultation and provides a consideration of the response proposed by the Council, noting where changes are considered necessary.

The Screening Opinion which concludes that Strategic Environmental Assessment/Sustainability Appraisal is not required on the Draft SPD is also provided for members' information (Appendix 3).

Members are invited to adopt the Flooding, Water Management and Sustainable Drainage Systems SPD, having regard to the contents of this report and supporting appendices. The document will then be used to inform the validation and determination of planning applications by the council.

RECOVERABILITY

This decision is recoverable under section 7 of part 3 of the constitution.

RECOMMENDATIONS

1. That the results of the Screening Opinion conducted on the Draft Flooding, Water Management and Sustainable Drainage Systems SPD as set out in Appendix 3 are noted.
2. That the responses to the consultation on the draft Flooding, Water Management and Sustainable Drainage Systems SPD as set out in the Summary of Representations (Appendix 2) are noted.
3. That the Flooding, Water Management and Sustainable Drainage Systems SPD (Appendix 1) is adopted for development management purposes.

REPORT

INTRODUCTION

1. Supplementary Planning Documents (SPDs) provide greater clarity as to the requirements of local plan policies for specific situations or types of development. SPDs may not make policy, but rather provide guidance on the application of the policies contained in the adopted Fylde Local Plan to 2032 (incorporating Partial Review) (the Local Plan).
2. Paragraph 3.9 of the Local Development Scheme 2020 identifies an SPD addressing Sustainable Drainage Systems and Critical Drainage Areas as one of the next suite of SPDs to be produced to support the policies of the adopted Fylde Local Plan to 2032 (incorporating Partial Review). The Flooding, Water Management and Sustainable Drainage Systems SPD is considered necessary for a number of reasons:
 - Flood risk and water management are key issues that need to be addressed in Fylde for both existing and future developments.
 - The coastal, low lying geographical location of Fylde places it a high risk of experiencing future flooding events from all sources.
 - Increasingly extreme weather events and other climatic changes, especially rainfall intensity and sea level rise are likely to increase the risk of flooding from all sources and the challenge of managing it effectively.
 - The integration of surface water and flood risk management measures will influence the design of all development proposals.
 - To provide practical guidance and advice for developers, planners, designers and consultants on what is expected of them as they bring sites forward across Fylde in relation to water management and the implementation of SuDS.

THE FLOODING, WATER MANAGEMENT AND SUSTAINABLE DRAINAGE SYSTEMS SPD

3. Chapter 1 of the SPD provides an introduction to the SPD. It provides background as to why the SPD is needed and some of the main issues considered. The scope of the SPD is limited to the legislative remit of Fylde Council as the Local Planning Authority.
4. Chapter 2 provides the local context, and explains why parts of Fylde are at relatively high risk of flooding.
5. Chapter 3 lists the Issues and Objectives.
6. Chapter 4 provides a review of Legislation and Policy, including the National Planning Policy Framework, the Planning Practice Guidance, the Local Plan, Neighbouring Local Plans and Neighbourhood Plans. It also summarises other relevant flooding and coastal plans and documents.
7. Chapter 5 provides detailed guidance on Flood Risk and Location of Development, it includes the Sequential Test, the Exception Test, Site Specific Flood Risk Assessments, Pre-purchase and Pre-Application Advice and advice related to Householder Developments.
8. Chapter 6 Managing and Mitigating Flood Risk covers detailed site design including finished floor and ground levels, site levels, floor levels, culverting, flood resilient construction materials, safe access and egress routes, green infrastructure and natural flood management.
9. Chapter 7 includes the Discharge Hierarchy and detailed advice on SuDS benefits, the SuDS management train, design principles, plus source control including rainwater harvesting, permeable surfaces, living roofs and walls and swales and filter strips, site control (including detention basins and underground storage). Regional Control is also covered and includes retention ponds and retrofitting. The Lead Local Flood Authority's (LLFA) SuDS pro forma is signposted and guidance on maintenance and adoption are also included.
10. Chapter 8 contains information on water quality and pollution control.
11. References are included plus the relevant Local Plan policies CL1 and CL2, the flood risk vulnerability and flood zone 'incompatibility' table, resistance and resilience measures, case studies, information relating to riparian ownership and definitions of resistance and resilience.

SCREENING AS TO WHETHER STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) IS REQUIRED

12. The Environmental Assessment of Plans and Programmes (EAPP) Regulations 2004 gave legislative effect in the UK to the EU Directive 2001/42/EC, requiring strategic environmental assessment (SEA) of certain plans and programmes. They remain in force, subject to certain amendments, following the UK's exit from the EU. In order to ensure that the SPD can be legally adopted, the Council has employed consultants to undertake a brief screening assessment on each SPD being brought forward.
13. The screening assessment of the draft SPD is presented in Appendix 3. This concludes that SEA is not required for the SPD (page 8 of the screening document). The statutory bodies that the EAPP Regulations states must be consulted as part of the SEA process concur with this view (Appendix to the screening document).

REPRESENTATIONS MADE TO THE DRAFT SPD AND CONSEQUENTIAL CHANGES

14. Following SEA screening, the draft SPD was published for consultation, in line with Regulation 12b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of four weeks between 29th June and 27th July 2023.
15. There were responses from 16 consultees. The full detail of the responses, and the Council's recommended response, are set out in the table in Appendix 2, set out in the order of the content of the document. Some content is repeated where it applies to more than one section of the SPD. The Council's response column notes where changes have been incorporated into the SPD.
16. The changes made from the Draft SPD are as follows:
 - At the request of the LLFA the SuDS proforma was removed from the SPD and is signposted instead. Climate change allowances have been added at paragraph 5.35. Advice on the lifetime of developments has also been included.
 - Further detail has been added to the Vision and Objectives, with respect to the protection of areas of peat, as requested by the Environment Agency.
 - The reference to the LLFA pre-application advice has been changed to the 'Surface Water Planning Advice Service'.
 - Paragraph 5.8 and 5.9 have been amended to clarify those circumstances where a sequential test will be required, as requested by Strategic Land Group.
 - The term playing pitches has been replaced by playing fields, at the request of Sport England. More text has been included at 6.13 to explain that these areas should be positively drained and included in the drained area of any development proposal.
 - More detail has been included on reservoir flooding at 5.10 at the request of United Utilities (UU), plus an additional bullet at 5.11 to cover hydraulic locking of outfalls from public sewers on development sites. Further text was also added to the sections relating to Pre-Purchase and Pre-Application Advice, about consulting UU, plus more information in the Householder Section on the impacts of paving over gardens.
 - Text on retrofitting Green Infrastructure has been added to 6.33 at the request of Natural England.
 - Further advice has been provided with respect to changes in levels and diversions of the public sewer system which will be unacceptable to United Utilities, along with advice that the connection of land drainage to the public sewer will not be permitted.
 - At the request of the LLFA a reference to their Ordinary Watercourse Consent Service has been provided.
 - Text has been included relating to the on-going management and maintenance of buffer zones at the request of the Canal and River Trust.
 - Wording has been added to paragraph 5.37 to clarify that Lancashire County Council (LCC) Highways do not accept third party discharge into any highway drains except in exceptional circumstances.

- Further text on minimising pumped discharges and design principles and SuDS, plus rainwater harvesting has been added at the request of UU.
- Additional text at 7.5 about the LLFA objecting to proposals to pump surface water.
- A footnote about consulting the LCC Heritage Environment Team has been included as text.
- Text has been added to advise that the Council will work with the Canal and River Trust to protect the water quality of the Lancaster Canal.
- At the request of UU further text added to appendix E to clarify that it is in the owner's interest to ensure that a point of outfall for the discharge of surface water to any watercourse/waterbody is secured as soon as possible, the right to discharge should be a key consideration in the acquisition of a site.

ADOPTION

17. The Flooding, Water Management and Sustainable Drainage Systems Supplementary Planning Document has been the subject of extensive consultation in line with the necessary legislative framework. Where appropriate, the document has been amended to reflect the comments that have been received and so Members are now invited to formally adopt the SPD, for use in the validation and determination of planning applications.

CORPORATE PRIORITIES	
Economy – To create a vibrant and healthy economy	✓
Environment – To deliver services customers expect	✓
Efficiency – By spending money in the most efficient way	✓
Tourism – To create a great place to live and visit	✓

IMPLICATIONS	
Finance	None
Legal	None
Community Safety	Prevention of Flooding and Pollution is important for community safety.
Human Rights and Equalities	Flooding often has a disproportionate effect on the poorest communities, its prevention is crucial to equality.
Sustainability and Environmental Impact	The SPD follows the principles of sustainable development.
Health & Safety and Risk Management	Flooding is a risk to public health and safety. The SPD helps to mitigate the risk.

SUMMARY OF PREVIOUS DECISIONS
18 th January 2023 Planning Committee resolved that the Draft Flooding, Water Management and Sustainable Drainage Systems Supplementary Planning Document together with the Statement of Consultation with the results of the Sustainability Appraisal Screening added, be issued for public consultation.
8 th June 2022 Planning Committee resolved that the Flooding, Water Management and Sustainable Drainage Systems (Scoping) be issued for public consultation.
14 th October 2020 Planning Committee approved the LDS 2020 which sets out a list of SPDs which will be produced by officers.

BACKGROUND PAPERS REVELANT TO THIS ITEM

Name of document	Date	Where available for inspection
Fylde Local Plan to 2032(incorporating Partial Review)	December 2021	Adopted Fylde Local Plan to 2032 (incorporating Partial Review) – Fylde Council
Draft Flooding, Water Management and SuDS SPD	January 2023	Draft-Flooding-Water-Management-and-Sustainable-Drainage-SPD.pdf (fylde.gov.uk)
Statement of Consultation (Draft Flooding, Water Management and SuDS SPD)	January 2023	Reg-12a-Consultation-Statement-for-Flooding-Water-Management-and-SuDS-SPD.pdf (fylde.gov.uk)
Flooding, Water Management and SuDS SPD Scoping Document	May 2022	Document.ashx (cmis.uk.com)

LEAD AUTHOR	CONTACT DETAILS	DATE
Julie Glaister	Julie.glaister@fylde.gov.uk 01253 658687	17 October 2023

Attached documents:

Appendix 1 Flooding, Water Management, and SuDS SPD

Appendix 2 Summary of Representations Made Under Regulation 13 to the Draft Flooding, Water Management and SuDS SPD.

Appendix 3 SEA Scoping Report



Flooding, Water Management and Sustainable Drainage Systems (SuDS)

Supplementary Planning Document

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How to Use This Document

The Fylde Council Flooding, Water Management and Sustainable Drainage Systems SPD is designed to assist applicants, developers, agents and consultants understand the Council's Local Plan policies that relate to flooding, water management and sustainable drainage. It provides guidance that gives further detail on the application of those policies in order to help applicants meet policy requirements. This should enable more rapid decision making on applications which have followed the guidance set out in the SPD.

Structure of the SPD

Although the contents of the SPD are broken down by theme, it is very important that the SPD be read as a whole. Applicants will normally need to have regard to all of the chapters when bringing forward new development. Only for small scale works such as householder extensions will it be appropriate to refer to individual sections.

Following the Introduction, Local Context, Issues and Objectives there is a review of Legislation and Guidance. Chapter 5 covers the requirements with respect to assessing flood risk and the location of development. Chapter 6 covers the many aspects of managing and mitigating flood risk. Including ground and floor levels, site layout, SuDs, culverts, safe access and egress routes and natural flood management.

Chapter 7 provides detailed information on the benefits of SuDs, the SuDs management train, design principles, the SuDs Proforma and maintenance and adoption. Water quality and Pollution Control are covered in Chapter 8.

Appendices A-E contain the relevant Local Plan policies, Flood Risk Vulnerability, Resistance and Resilience Measures, Riparian Ownership and Property Flood Resilience Measures.

1. Introduction

- 1.1 Flood risk and water management are key issues that need to be addressed in Fylde for both existing and future developments. Given the coastal, low-lying geographical location of Fylde, it is at high risk of experiencing future flood events from all sources. Flooding has consequences for both the population and property, for the economy, tourism, environment and biodiversity and for social, health and well-being. Increasingly extreme weather events and other climatic changes, especially rainfall intensity and sea level rise, are likely to increase the risk of fluvial, tidal and surface water flooding in Fylde and the challenge of managing it effectively.
- 1.2 The integration of surface water and flood risk management measures will influence the design of all development proposals. They will help to alleviate surface water, reduce flooding levels as well as being as resilient as possible to the impact of flooding. Planning policy is also clear that sustainable drainage is important and should be provided in all major, new developments, unless there is clear evidence that this would be inappropriate, and that it should be given priority in new developments in flood risk areas (gov.uk, 2021).
- 1.3 Supplementary Planning Documents (SPDs) provide further detail and guidance in relation to policies and proposals within the Development Plan, in this case the Fylde Local Plan to 2032 (incorporating Partial Review) (the Local Plan) which was adopted by the Council on 6th December 2021.
- 1.4 Policies in the Fylde Local Plan to 2032 (incorporating Partial Review) seek to ensure that new development takes every opportunity to reduce the overall level of flood risk and to ensure sustainable drainage systems make the best possible contribution to their environment as a result of their ability to provide multifunctional benefits, including improvements to amenity, biodiversity, pollution control and opportunities for recreation.
- 1.5 The main objective of this document is therefore to provide practical guidance and advice for developers, planners, designers and consultants on what is expected of them as they bring sites forward across Fylde in relation to surface water management and the implementation of Sustainable Drainage Systems (SuDS).
- 1.6 This SPD has been informed by the earlier consultation on the SPD Scoping Report. The Council previously consulted on the Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD (Scoping) between 9th June 2022 and 7th July 2022. The SPD Scoping Report included questions about the proposed content and options for dealing with particular issues.
- 1.7 Additional issues raised through the Consultation on the Draft SPD (29th June-27th July 2023) have been reviewed by the Council and considered for inclusion within the document. Whether or not additional issues are included will reflect consideration of the evidence in relation to those issues and whether they can be addressed by the Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD.

- 1.8 The scope of this SPD is limited to the legislative remit of Fylde Council as the Local Planning Authority although it does provide advice from other organisations responsible for flooding.

2. Local Context

2.1 Flood risk in Fylde occurs from a variety of sources. These include:

- Coastal
- Surface water run-off
- Pluvial and Fluvial Flooding
- Other watercourses
- Groundwater flooding (high water table)
- The sewerage network (sewers, rising mains etc)

2.2 Fylde is a low-lying coastal area at the lower end of two river catchments, the Ribble and the Wyre. Surface water flooding happens when rain from heavy storms overwhelms local drainage capacity. It is a significant risk affecting more than 3 million properties in England. Like all flooding it causes significant disruption to people's lives and livelihoods, damaging homes and businesses, causing stress and anxiety and closing roads, railways, schools and hospitals. It can also cause environmental impacts.

2.3 Surface water flooding is a growing challenge with climate change bringing more frequent heavy storms, new developments increasing the need for drainage, and our ageing sewerage infrastructure which is costly to maintain and upgrade. The risks are greatest in large urban areas. Managing surface water risks means making sure that water drains effectively from existing homes and gardens, roads, fields, businesses and public spaces. New development risks reducing the capacity of the land to provide natural drainage and has the potential to increase surface water run-off. So, it is important to ensure that new properties have effective ways of managing run-off which also requires that drainage systems old and new are well maintained so that they perform to their intended capacity and that drainage networks of sewers, ditches and underground culverts function effectively.

2.4 Surface water management needs coordinated action by all those with responsibilities for managing land, rivers and drainage systems, including national and local government, water companies, landowners and businesses.

2.5 Map 1 shows that Fylde has significant areas in Flood Zone 2 (medium risk of flooding) and Flood Zone 3 (high risk of flooding).

2.6 The main areas with a relatively high risk of flooding (Zone 3) are:

- On the coastline in the south of the Borough.
- The river Wyre and its tributaries in the north of the Borough.
- Lytham and area of farmland to the north of that town.
- The area east of Freckleton.

Map 1: Flood Zones 2 and 3 in Fylde Borough



3. Issues and Objectives

3.1 Issues

- Flooding issues caused downstream of the proposed development.
- Climate change will exacerbate flood risks from all sources.
- Surface water assets (e.g., SuDs/balancing ponds) are installed by developers, with no guarantee of long-term management and maintenance.
- Pollution issues resulting from leaching.
- Fylde already relies on pumping stations at times of high tides, sea level rise will exacerbate the situation.
- Farmland being affected by standing water at certain times of the year, preventing crops from being planted.
- Combined surface water/sewage system means at times of high rainfall the volume of water needing treatment increases and there are permitted spillages into the sea, this can impact on bathing water quality.
- Cutting off access to watercourses for maintenance by riparian owners.
- Badly maintained downstream watercourses, coupled with poorly constructed outfall details to watercourses, leading to scour and surcharging.
- Effects development has on existing neighbouring property – e.g. the influence of imported material and raising ground levels, the cumulative effect of runoff to neighbours requires perimeter flood mitigation measures.
- There is a significant risk of flooding from reservoirs, sewers and surface water now and in the future.
- Influence of development on existing ground water – large areas of the Fylde are at risk of groundwater flooding – groundwater monitoring required (ideal min. data for Nov to May) *Figure 1 shows 1km squares of groundwater flood risk, colour coded as, light green <25%; light blue >25% but <50%; darker blue >50% but <75%; purple >75% groundwater flood risk, reports from farmers, trial holes, British Geological Society borehole records etc suggest groundwater levels are rising.*
- Wetlands are a significant resource which should be retained and managed. They are a means of source control, help improve water quality and increase biodiversity. Many areas in Fylde have bands of peat between bands of clay or sand already susceptible to groundwater flooding. Where areas of peat are identified, any drainage design and water management should require a tailored approach. Any peat deposits would require a buffer to ensure the hydrology of the soil is maintained, any design should avoid areas of peat being developed or sealed in. Developers rely on using imported fill and raising of ground levels. This compresses the peat, squeezing out trapped water and carbon. According to Natural England the peat oxidizes, local groundwater levels can rise and carbon is released. These wetland areas need to be protected in order to reduce/minimize these effects which will impact on climate change. Developers should demonstrate that their schemes avoid climate change impacts. Where these cannot be avoided developers will have to demonstrate adequate mitigation.

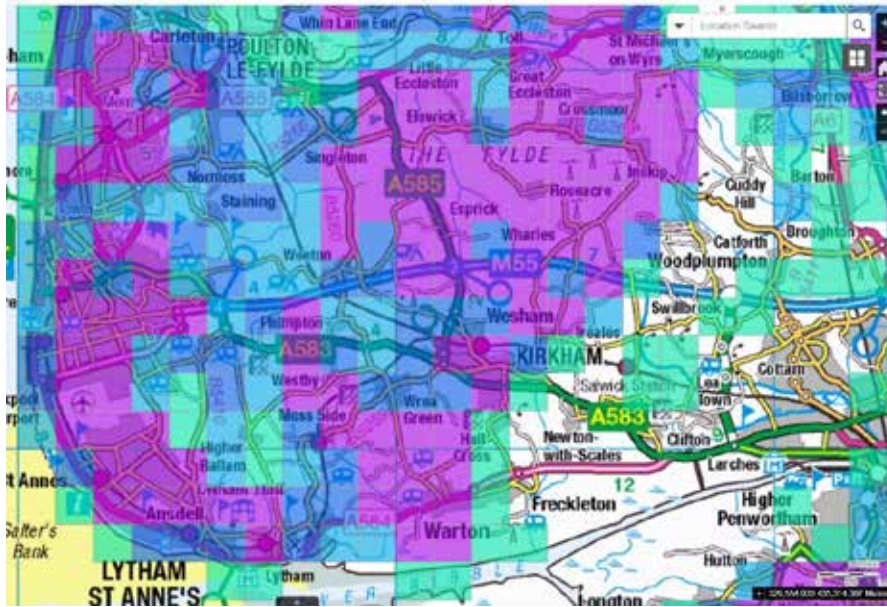


Figure 1: Groundwater Flood Risk (Mapzone, 2022)

Objectives

- To steer new development to areas with the lowest probability of flooding.
- Encourage the use of water efficient and recycling devices within new developments.
- To provide safe and accessible drainage discharge points.
- To ensure that new development is resilient to flooding over its lifetime and does not increase the risk of flooding either on a site or cumulatively elsewhere.
- To ensure watercourses are accessible for maintenance.
- To ensure that development incorporates appropriate water management techniques which improves the existing hydrological conditions and maximises the opportunities and benefits to enhance water quality and quantity, biodiversity and amenity.
- The addition of SuDS including permeable paving, planted roofs, filter drains, swales, basins and ponds wherever appropriate.
- To ensure the provision of long-term maintenance of SuDS and surface water assets, in order to sustainably mitigate the risk of flooding.
- To promote the use of porous materials to reduce surface water run-off in new developments and applications for changes of use.
- To achieve biodiversity net gain through the appropriate implementation of SuDS.
- To incorporate the use of green infrastructure wherever possible to reduce flooding.
- To maximise the potential of existing SuDS in the Borough and promote their implementation in new developments.
- To mitigate any risks posed to buried archaeological remains, particularly through the installation of SuDS.
- To retain and enhance salt marshes and wetlands, in particular peat in order to maximise their water management potential and mitigate climate change impacts.
- To increase tree cover which will benefit amenity, contribute to run off management, water quality and biodiversity.*
- To mitigate and adapt to the effects of climate change.
- To ensure comprehensive engagement with the Lead Local Flood Authority, the Environment Agency, other Local Planning Authorities, water companies and other interested bodies including the local community.

*The North West of England is low on woodland cover, with Lytham St Anne's being at 7% (Doick, K. J 2017), well below the national average of 13% for the UK and 10% in England (Atkinson S & Townsend M 2011). A countrywide initiative increasing tree canopy cover is being pushed forward by the Government's 25 year plan. Backed by the Committee on Climate Change, it commits the UK to net zero greenhouse gas emissions by 2050 and implements Agenda 21 for tackling sustainability, improving health and increasing green infrastructure. The government has set a target for canopy cover in coastal regions of 12%, giving the Council a target of a 5% increase to be achieved by 2050.

4. Legislative and Policy Review

European Legislation

EU Water Framework Directive 2000

- 4.1 The Directive committed member states to protecting, enhancing and restoring water bodies to 'good' status for all ground and surface waters (rivers, lakes, transitional and coastal waters) in the EU. Local planning authorities were required, in exercising their functions, to have regard to the river basin management plans on the Environment Agency website that implemented the Water Framework Directive.

The EU Floods Directive 2007

- 4.2 The Directive required member states to assess if all water courses and coast lines are at risk from flooding, to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce the flood risk. It also reinforced the rights of the public to access this information and to have a say in the planning process.

National Legislation

The Water Environment (Water Framework Directive) Regulations 2017

- 4.3 The Water Framework Directive (WFD) Regulations are an important mechanism for assessing and managing the water environment in the UK. It originates from the EU Water Framework Directive, but still forms part of the UK law post Brexit. The core aim of the UK's Water Framework Directive is to protect the UK's water environments by preventing their deterioration and improving their quality. It does this by setting ecological targets and environmental objectives.

The National Planning Policy Framework (NPPF)

- 4.4 The NPPF was published in September 2023 and sets out the Government's planning policies for England and how these are expected to be applied. Paragraphs 20-23 are concerned with strategic policies. Paragraph 20 contains criterion b. This states that strategic policies should set out an overall strategy for the pattern, scale and design of places, and make sufficient provision for: infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
- 4.5 Chapter 14 is entitled "Meeting the challenge of climate change, flooding and coastal change". In summary, Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection

measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

- 4.6 It highlights that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Development should be made safe for its lifetime without increasing flood risk elsewhere. Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.
- 4.7 Chapter 14 also contains a section on Coastal Change which highlights the importance of taking into account the UK Marine Policy Statement and Marine Plans. Any area likely to be affected by physical changes to the coast should be identified as a Coastal Change Management Area. Fylde has designated Coastal Change Management Areas and so paragraphs 170-173 are relevant.

Planning Practice Guidance (PPG)

- 4.8 The PPG advises how to take account of and address the risks associated with flooding and coastal change in the planning process. Based on the content of the NPPF, it sets out the main steps to be followed to ensure that if there are better sites in terms of lower flood risk, or a proposed development cannot be made safe, it should not be permitted. The link to the Flood Risk and Coastal Change PPG guidance can be found here: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-and-coastal-change)
- 4.9 The PPG also advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure. It contains advice on what the plan making may need to consider in regard to water infrastructure, water quality and waste water. It acknowledges that there are cross boundary issues and liaison between strategic policy-making authorities, the Environment Agency, catchment partnerships and water and sewerage companies from the outset will help to identify water supply and quality issues and the need for new water and wastewater infrastructure, to fully account for proposed growth and other relevant issues such as flood risk. The link to the Water Supply, Wastewater and Water Quality PPG guidance can be found here: [Water supply, wastewater and water quality - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality)

The Fylde Local Plan to 2032 (Incorporating Partial Review)

- 4.10 The Fylde Local Plan to 2032 (Incorporating Partial Review), adopted December 2021, together with the Joint Lancashire Minerals and Waste Core Strategy DPD 2009 and the Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policies DPD form the statutory Development Plan for Fylde.

Local Plan Objectives

- 4.11 Strategic Objective 2: To maintain, improve and enhance the environment by:

The following sub objectives are relevant:

- Protecting, restoring and enhancing the quality, character and distinctiveness of the biodiversity, landscape and countryside of Fylde
- Expanding biodiversity resources, including improving habitat connectivity, particularly away from the coastal edge.
- Improving access to the natural environment.
- Minimising the risk of surface water flooding, coastal and pluvial flooding and groundwater flooding, to existing and new development and to agricultural land, and improving bathing water quality.
- Protecting best and most versatile agricultural land.
- Supporting the delivery of actions identified in the Coastal Strategy.
- Ensuring that infrastructure is available to enable new development, whilst protecting and enhancing the natural and built environment.
- Working with the Marine Management Organisation to ensure clean, healthy, safe, productive and biologically diverse seas.

Fylde Local Plan to 2032 (incorporating Partial Review) Relevant Policies

- 4.12 Strategic Policy M1 Masterplanning the Strategic Locations for Development in particular criteria o, p, u and w which outline requirements for the retention and integration of important features including water bodies, development in Flood Zones 2 and 3 and wastewater infrastructure upgrades.
- 4.13 Strategic Policy GD7 Achieving Good Design in Development in particular criterion t, u and z which outlines requirements for mitigating the effects of and adapting to climate change, and inappropriate development in Flood Zones 2 and 3.
- 4.14 Strategic Policy HW1 Health and Wellbeing criteria e, f and g, outline encouraging provision of allotments and garden plots to produce locally grown, healthy food, improving healthy lifestyles and reducing health inequalities and promoting initiatives to facilitate healthier lifestyles where they can be delivered through the planning system.
- 4.15 Strategic Policy INF1 Service Accessibility and Infrastructure - criteria c proposes to mitigate any environmental impacts of new development, whilst criteria e and g concern improvements to existing and provision of new infrastructure whilst ensuring a coordinated and holistic approach to infrastructure delivery.
- 4.16 Non-strategic Policy INF2 Developer Contributions – Subject to viability, development will normally be expected to contribute towards the mitigation of its impact on the environment. This includes criterion c which covers flood risk management and coastal defences (including strategic flood defence measures and local flood risk management measures) and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage systems – SuDS). Criterion h covers climate change and energy initiatives.
- 4.17 Strategic Policy CL1 Flood Alleviation, Water Quality and Water Efficiency (see Appendix A for full version)– the entire policy is highly relevant and focusses on the fact all new development

is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations. Criterion b supports the retrofitting of SuDS (Sustainable Drainage Systems), in locations that generate surface water runoff. Critically, criterion d ensures that new development is directed away from areas at high risk of flooding and incorporates appropriate mitigation against flooding in areas of lower risk. Developer contributions will be required for the provision and maintenance of SuDS where they are not provided as part of the development. They will also be required for the repair or replacement of the sea defences, coastal protection measures and the maintenance of the sand dunes system.

- 4.18 Strategic Policy CL2 Surface Water Run-Off and Sustainable Drainage (see Appendix A for full version) contains a number of criteria specifying the incorporation of a number of sequential attenuation measures. The policy also references the SuDS hierarchy in priority order as well as the importance of utilising SuDS wherever practical. Proposals may also be required to provide a feasibility assessment for the use of SuDS including consideration of the potential design of any scheme and ongoing maintenance arrangements.

- 4.19 Strategic Policy ENV1 Landscape criterion d requires suitable landscape planting of native species, appropriate to its context to be incorporated within or, where appropriate, close to new development. Measures should be put in place for the management of such landscaping. Specific consideration should be given to how landscaping schemes will minimise the rate of surface water run-off. Details of the ongoing maintenance of all landscaping areas will be presented for approval by the Council.

- 4.20 In the Coastal Change Management Areas development will only be permitted where it meets all of the criteria. Criterion 3 states that development must not adversely affect the nature conservation assets of the coastline, predominantly the Ribble and Alt Estuaries SPA/Ramsar. Project Specific Habitats Regulations Assessments (HRAs) will be required for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no significant effect upon the SPA/Ramsar Sites before the tourism and coastal developments can be granted consent. Where development does occur in these areas, developer contributions will be sought for the conservation, management and enhancement of important wildlife habitats and the creation of new habitats.

- 4.21 Strategic Policy ENV3 Protecting Existing Open Space (part of the Green Infrastructure Network), protects existing areas of public open space which are identified on the Policies Map from inappropriate development. This includes sports and playing fields, parks, other areas of public open space, open spaces that make a positive contribution to the historic environment, allotments and Fylde's Public Rights of Way. Criteria d states that these existing areas of open space will be protected unless it can be demonstrated that any proposal will not have adverse effects contrary to the landscape, biodiversity and water management requirements of the Local Plan and the requirements set out in the other criterion in this policy are met.

Neighbouring Local Plans

- 4.22 The Wyre Local Plan 2011-2031 (incorporating Partial Update of 2022) and the Blackpool Local Plan Part 2 are important considerations in this SPD. Flooding is not contained within Borough boundaries, and therefore any development allocations in neighbouring areas could have an impact on the situation in Fylde, and vice versa.

Neighbourhood Plans

Bryning with Warton Neighbourhood Development Plan

- 4.23 To minimise the risk of flooding, reduce pollution to watercourses and to minimise surface run-off, Policy BWNE3 supports the provision of SuDS and the sustainable design of buildings. It specifies that areas of hard standing such as driveways and parking areas should be minimised, and porous materials used where possible.

Saint Anne's on the Sea Neighbourhood Development Plan

- 4.24 The Saint Anne's on the Sea Neighbourhood Plan highlights the following sustainability issues:
- Adapting to climate change
 - Reducing surface water flooding
- 4.25 The policies include Policy SU1 Incorporate sustainable urban drainage into new development, which requires that new developments must incorporate SuDS to the maximum standards stipulated in DEFRA's Non-Statutory Technical Standards for SuDS unless agreed otherwise with Fylde Council. It suggests that sustainable urban drainage may include features such as ponds, swales, and permeable paving. Schedule 3 of the Act has not been fully implemented, however in England DEFRA have issued the **Non-statutory Technical Standards for SuDs** to assist the strengthened planning system, Wales has adopted schedule 3. Scotland and Northern Ireland have separate legislation through the Flood Risk Management Act 2009 and Northern Ireland through The Water Environment (Floods Directive) Regulations (Northern Ireland) 2009 respectively.

Strategic Flood Risk Assessment (SFRA) (2011)

- 4.26 The SFRA was prepared by Wyre Borough Council on behalf of Fylde Council. The aim of the document is to influence the spatial planning process in the context of sustainable developments and to provide sufficient and robust evidence to allow the Sequential Test to be applied in the site allocation process. The SFRA also identifies the level of detail required for site-specific Flood Risk Assessments in particular locations, and enables the Council to determine the acceptability of flood risk in relation to emergency planning capability. A new SFRA Level 1 is currently being prepared for the three Fylde Coast Authorities.

The Flood and Water Management Act 2010

- 4.27 This relates to the management of the risk concerning flooding and coastal erosion. The Act claims to reduce the flood risk associated with extreme weather, intensified by climate change. It established Lead Local Flood Authorities (LLFAs) which for Fylde is Lancashire County Council.

A Review of Flood Risk and Surface Water Management in Fylde Borough

- 4.28 This report was approved by the Environment, Health and Housing Committee and provides the findings from several meetings of a working group established at Fylde Council in 2020/21 to look at the impacts of flooding and how matters could be improved.
- 4.29 The review covers the history and legislation of drainage, the roles of the Risk Management Authorities (RMAs) along with the different statutory and enabling roles the Council plays. The working group identified several issues of concern which led to a proposal of 30 recommendations directed to the Council, other RMAs and partnership groups for change. Central to this is Fylde Council taking on a greater role to act as community leader on flooding and surface water management in Fylde, including adoption of natural flood management techniques

North West Inshore and North West Offshore Marine Plan

- 4.30 Policies in the North West Marine Plan encourage enhancement and provide protection for vulnerable habitats and species, maintenance of natural defences against climate change and flooding, and will improve the well-being of coastal communities and support a strong marine economy. Policy NW -CC-2 of the North West Marine Plan states that: "proposals in the north west marine plan areas should demonstrate for the lifetime of the project that they are resilient to the impacts of climate change and coastal change". The aim of this policy recognises that the effects of climate change are wide-ranging and can include coastal flooding.

Fylde Council Coastal Strategy 2015-2032

- 4.31 The Fylde Council Coastal Strategy recognises that the Fylde Coastline is at risk from coastal erosion and flooding. There are 10 objectives with two being related to water management. These are:
- to safeguard the coast from flooding, coastal erosion, and the effects of climate change, and:
 - to improve the quality of our bathing water and beaches.
- 4.32 Theme 2 is Coastal Protection. The key actions are:
- Prepare a study, analysing all the options to replace the land sea defences.
 - Prepare a bid for funding through the Environment Agency medium term plans to replace the land sea defences.
 - Develop a funding strategy for the sea defences.
 - Secure funding to replace the land sea defences at Church Scar and Fairhaven Lake Sea Wall(complete).
 - Engage with key stakeholders, organisations and the community
- 4.33 Theme 3 is Water Quality. The key actions are:
- Implement the new Bathing Water Directive.
 - Support the implementation of the Fylde Peninsula Water Management Group 10 point Action Plan.
 - Develop and implement the Beach Management Plan for the Fylde coastline.

Local Flood Risk Management Strategy for Lancashire 2021 - 2027

- 4.34 This Strategy sets out how the Lead Local Flood Authority (LLFA) intend to work with partners, businesses and communities to manage the risk of flooding in Lancashire until 2027. It is of relevance to everyone who lives and works in Lancashire, as well as all organisations that have a responsibility for flooding in the area.
- 4.35 The strategy shows 6 key themes:
- Delivering effective flood risk management locally
 - Understanding Local Risks and Challenges
 - Supporting sustainable flood resilient development
 - Improving engagement
 - Maximising investment opportunities to better protect businesses and communities
 - Contributing towards a climate resilient Lancashire
- 4.36 41 key objectives for delivery by 2027 are presented.

Shoreline Management Plan

- 4.37 The aim of Shoreline Management Plan (SMP) is to identify policies to manage risks. The SMP policy for most of the Fylde coast is to “hold the line”; this means strengthening, maintaining or rebuilding the existing defences to maintain the existing shoreline. The SMP is a large-scale assessment of the coastal processes and aims to reduce risks to people and the developed, historic and natural environments. The SMP also aims to identify the most sustainable approaches to managing the coastline in the short, medium and long term.
- 4.38 The implementation of the SMP “hold the line” policy is developed within Strategy Appraisal Reports (StARs). The StARs also identify key areas of the coastline that require substantial work. Following the development of the StARs, project specific Project Appraisal Reports (PARs) explore and analyse the economic, sustainability and environmental issues, to determine the most appropriate course of action to implement the SMP policy.

CIRIA C753 The Sustainable Drainage Systems (SuDS) Manual

- 4.39 The CIRIA SuDS Manual provides best practice guidance on the construction of SuDS to ensure effective delivery. The guidance covers the planning, design, construction and maintenance of SuDS to assist their successful implementation within new and existing developments. It looks at how to maximise amenity and biodiversity benefits and deliver the key objectives of managing flood risk and water quality. A principal element of the manual is to ensure that SuDS can be designed confidently, in a way that can maximise the opportunities and benefits that can be secured from surface water management. It highlights that through engagement and collaboration, SuDS can be integrated into the design of urban areas, to create high quality places for future generations.

Sustainable Drainage Systems: non-statutory technical standards

- 4.40 The Sustainable Drainage Systems: non- statutory technical standards sets out the non-statutory technical standards for sustainable drainage systems. They should be used in conjunction with the National Planning Policy Framework and Planning Practice Guidance. The link to the document is as follows: [Sustainable drainage systems: non-statutory technical standards - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/Sustainable_drainage_systems_-_non-statutory_technical_standards_-_GOV.UK.pdf)

ADEPT: Flood Risk Emergency Plans for New Development

- 4.41 ADEPT aims to inform decisions about whether development proposed in areas of flood risk will be safe in relation to emergency plans (EPs) and access and escape routes. The guide encourages the production of more detailed local guidance to:
- make the most efficient use of emergency planning resources
 - minimise the need to consult
 - drive up the quality and consistency of proposals
 - minimise delays

- 4.42 Where such local guidance is absent, this guide can form the basis for assessing proposals. It includes guidance on:
- Roles and responsibilities
 - Planning policy context
 - The role of emergency plans
 - The content and structure of emergency plans
 - Reviewing and agreeing emergency plans
 - Flow diagram
 - Emergency plan checklist

Ribble: Catchment Flood Management Plan and Wyre: Catchment Flood Management Plan

- 4.43 The Catchment Flood Management Plans provide an understanding of the scale and extent of present and future flooding and set policies for managing flood risk within the catchments. The respective areas are divided into sub areas that have similar characteristics, sources of flooding and levels of risk and an assessment of the most sustainable approaches to managing flood risk in these areas is presented.

United Utilities Water Resources Management Plan

- 4.44 The Water Resources Management Plan is a United Utilities document which aims to achieve a long term, best value and sustainable plan for water supplies in the Northwest. It explains the water supply system and provides a water supply baseline position. A number of options to address water supply resilience risks are discussed. The Water Resources Management Plan can be found here: [Water Resources Management Plan \(unitedutilities.com\)](https://www.unitedutilities.com/water-resources-management-plan)

Lead Local Flood Authority – Surface Water Planning Advice

- 4.45 Lancashire County Council the Lead Local Flood Authority have a Surface Water Planning Advice Service
- 4.46 Applicants for planning permission should seek advice from the Lead Local Flood Authority regarding their major development proposals for surface water and sustainable drainage systems. The benefits to accessing up-to-date advice regarding surface water and sustainable drainage systems include: Relevant, accurate up-to-date advice regarding surface water and sustainable drainage systems, feedback on indicative proposals, reduced likelihood of surface water and or sustainable drainage issues that could potentially affect the planning application. Applicants should complete the Sustainable Drainage Systems SuDS pro-forma, the pro-forma and guidance on how to complete it can be found on the LLFA website.

5 Flood Risk and Location of Development

- 5.1 Flood risk is a combination of the probability and the potential consequences of flooding from all sources – including rivers and the sea, directly from rainfall on the ground surface and rising groundwater, overwhelmed sewers and drainage systems and from reservoirs, canals and lakes and other artificial sources. (PPG Paragraph: 002 Reference ID -002-20140306).
- 5.2 It is necessary to identify how vulnerable a proposed development is using the classification in [Annex 3: Flood Risk Vulnerability Classification of the NPPF](#). This classification shows that the more vulnerable the development type is, the more important it is to locate it in areas with the lowest possible flood risk.
- 5.3 The Environment Agency has identified different Flood Zones which cover areas that are at different level of flood risk:
- Flood Zone 1 (low probability)
 - Flood Zone 2 (medium probability)
 - Flood Zone 3a (high probability)
 - Flood Zone 3b (functional floodplain)¹
- 5.4 Paragraph 159 of the NPPF states that *“inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.”* To achieve this, it sets out a number of requirements for Local Planning Authorities, including:
- preparation of Strategic Flood Risk Assessments to inform local planning decisions and provide a starting point for site-specific Flood Risk Assessments;
 - application of a Sequential Test to planning applications which are for larger and more vulnerable types of development in higher risk areas to ensure that such development is located in areas at lowest flood risk now and in the future, from any source, as far as possible; and
 - application of an Exception Test for certain planning applications where development is proposed in a higher flood risk area (e.g. where alternative sites are not available in a lower flood risk area), in order to demonstrate that the development is justified and can be made safe.

Sequential Test

- 5.5 Development should not be approved if there are reasonably available sites in areas with a lower probability of flooding. The aim of the sequential test is to keep development out of medium and high-risk flood areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible (PPG). It is used to ensure that areas at little or no risk of

¹ Please note that Flood Zone 3 is split into 3a and 3b, where the Local Planning Authority has designated 3b for planning purposes through the Strategic Flood Risk Assessment. Flood Zone 3b is therefore not defined on the [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362222/flood-map-for-planning-service.pdf).

flooding are developed in preference to areas of higher risk and applies to all forms of flood risk. This national guidance is reinforced locally through Policy CL1 of the Local Plan.

5.6 Where there are no reasonably available sites in Flood Zone 1, the Council will take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exceptions Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

5.7 The PPG states that:

“This general approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered and developers do not waste their time promoting proposals which are inappropriate on flood risk grounds.

According to the information available, other forms of flooding should be treated consistently with river flooding in mapping probability and assessing vulnerability to apply the sequential approach across all flood zones.” Paragraph: 018 Reference ID: 7-018-20140306

<https://check-long-term-flood-risk.service.gov.uk/map?easting=333538.07&northing=430010.97&map=RiversOrSea>

5.8 A sequential test must be undertaken as part of the planning process if any of the following apply:

- The development is in Flood Zone 2 or 3;
- A sequential test has not already been completed for development of the same type on the proposed site.
- There are other sources of flood risk that affect the site; or,
- More recent information indicates that there may be a flooding issue.

5.9 A sequential test does not need to be carried out if the flood risk of the site has been assessed as part of the Local Plan process, provided flood risk and development circumstances have not changed, or if either of the following apply:

- The proposed development is a minor development, or
- The proposed development involves a change of use (eg from commercial to residential) unless your development is a caravan, camping chalet, mobile home or park home site (NPPF).

5.10 The risk of flooding from a combination of all potential sources will need to be considered for all development sites. Applicants should consult with the sewerage undertaker to confirm the nature and extent of any flood risk from **public sewers**. Applicants should also refer to the **reservoir flood** risk map available [here](#). There are two small, self-contained, circular, covered

reservoirs in Fylde. One is north- east of the junction of Preston Road and Weeton Road, the other south of the M55 motorway east of Weeton. Both reservoirs are surrounded by Countryside Areas which are protected from development by Policy GD4 of the Local Plan. If development were proposed in the reservoir flood zones applicants should discuss the proposal with the reservoir operators at the earliest opportunity.

- 5.11 With respect to sewer flood risk, this should include consulting with the wastewater undertaker to understand:
- a) if there are any sewerage surcharge levels at the point of connection that could influence site design;
 - b) whether there is an incident of sewer flooding at, or in the vicinity of, the proposed development site; and
 - c) if sewer modelling data indicates that existing sewers that pass through or near to the site present a modelled risk of sewer flooding to the proposed development site.
 - d) if a high tide could result in hydraulic locking of outfalls from existing drainage systems such as the public sewer on a site as this could increase the risk of flooding from the public sewer on a development site.
- 5.12 This consultation will inform the Local Planning Authority of whether there is a need to apply the sequential approach to new development proposals. In all cases, applicants will need to demonstrate that the proposed development would be safe and not lead to increased flood risk elsewhere e.g. through careful masterplanning of a site. Applicants should not assume that changes in levels or any proposed diversion of the public sewerage system will be acceptable as such proposals could increase flood risk.

Applying the Sequential Test

- 5.13 If a sequential test is required, the applicant is expected to assemble the evidence to allow the council to consider whether the development passes the test.
- 5.14 There is no prescribed format for the sequential test, but the information should sufficiently answer the question:

Are there, or are there not, any reasonably available sites in areas with a lower probability of flooding that would be appropriate to accommodate the type of development or land use proposed?

- 5.15 The developer therefore should include:
- the name, location, size, assumed development capacity, overview of the development proposal, high level overview of flood risk (flood zones - present day and

with climate change), any other pertinent information, such as the reason for choosing the particular site.

- Parameters - This should include a map or a clear description of the area of search, together with the reasons for choosing that area. It should clearly explain and justify any limiting parameters applied to the site search, such as size/capacity; particular locational requirements etc. Applicants will need to agree with Fylde Council an appropriate area of search and a list of reasonably appropriate sites against which to test the proposed application site.
- Review of alternative sites - Applicants should provide a clear schedule of alternative sites considered, with map(s) where this is needed to clearly identify sites. For each site, this review should identify the level of flood risk of the alternative site and whether it is a reasonably available alternative.

5.16 If there are no alternative reasonably available sites at a lower flood risk than the proposed site, the conclusion may be drawn that the site and proposed development have passed the Sequential Test.

Area of Search

5.17 National guidance does not define the area of search that should be applied. Instead, it suggests that the area will be defined by local circumstances and the type of development proposed. The start point should clearly be the parts of the Borough with lower flood risk and then amended if there are sustainable reasons for doing so.

5.18 In most cases a search for sites of lower flood risk will incorporate the whole Borough with any variation to be justified in their sequential report and agreed by the Council at pre-application stage.

5.19 A reduced area of search may be acceptable depending on the local circumstances and whether it can be demonstrated that there is a local need e.g. for affordable housing in that area. The area of search can be influenced by the particular policy objectives, the scale of the development, or the purpose of the development itself (a particular area it intends to serve for example).

5.20 The following table is suggested as a starting point for appropriate search areas for different types and locations of development:

Suggested Sequential Test Area Search for Fylde		
Type of Development	Area of Search	Reason
Major Residential schemes	Borough wide	All residential development contributes towards the housing need in the Borough
Commercial development	Borough wide	Most commercial development contributes to

		economic development in the Borough
Town Centre Development	Within the same town centre boundary as the proposal site	The flood risk sequential test should not undermine other Sequential Test requirements for town centres.
Development which has a specifically defined catchment area e.g. new schools; services or businesses specifically intended to serve a particular area etc	Defined catchment area (evidence required as part of Sequential Test)	Locating the scheme outside of the required catchment area would prevent the development from fulfilling its function.
Development with location specific operational requirements e.g. development that requires a coastal location such as marine businesses; extensions to existing businesses	Sites across the borough that meet the particular operational requirement (evidence required as part of Sequential Test)	Locating the development on an alternative site would prevent the development from fulfilling its function.

Reasonably available alternative sites

- 5.21 For applicants and the Council to be able to consider whether or not there are any appropriate alternative sites appropriate for a proposed development, comparator sites need to be identified and assessed. A rational approach to the availability of alternatives will be taken.
- 5.22 A site would be considered a reasonable alternative if the following criteria are met:
- The site is within the agreed area of search
 - The site is of an appropriate size for the proposed development
 - The site can accommodate the functional requirements of a proposed development
 - The site can be viably developed
 - The site is available for development
 - The site is not safeguarded or allocated in the Local Plan or any Neighbourhood Plans for another use, or has planning permission for another use.
- 5.23 As part of the pre-application process, a comparator site range should be agreed with the Council. For residential schemes this could be based on the number of dwellings proposed or the site area. The Council will normally apply a +/- 10% buffer to create a range within which comparator sites can be identified. For example, if the number of dwellings proposed is used as the basis for determining comparability, a residential scheme of 30 dwellings would generate a comparator site number of 27-33 dwellings. The same principle will apply to site area.
- 5.24 The method used will depend on the circumstances of the site and the proposal. For higher density developments, for instance flats, the number of dwellings proposed should be normally used. For lower density developments, for instance large, detached houses, the site area

should normally be used. For residential development, in some cases, the Council may wish to apply both number of dwellings proposed and site size parameters.

Exception Test

- 5.25 Development should be directed to Flood Zone 1. If it is not possible for the development to be located in zones with a lower probability of flooding, the exception test can be applied if appropriate. The Exception Test is a tool used to ensure that, where a Sequential Test is passed, the development provides wider benefits which outweigh the flood risk and the development is designed to be safe. It should only be applied as set out in PPG Flood Risk Table 2 (Appendix B).
- 5.26 The Exception Test will be required where a proposal passes a Sequential Test or where the flood risk of an allocated site has increased since it was allocated, and the site is:
- Located in Flood Zone 2 and is considered highly vulnerable²;
 - Located in Flood Zone 3a and is considered either a more vulnerable use or essential infrastructure; or
 - Located in Flood Zone 3b and is considered essential infrastructure.
- 5.27 To pass the exception test it should be demonstrated that:
- a) *The development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
 - b) *The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reduce flood risk overall (NPPF, 21)*
- 5.28 The exception test applies to both planning applications and the allocation of land through the development plan process. It is required that both elements of the test should be satisfied.
- 5.29 The applicant is responsible for providing the evidence for the Exception test and the Council will consider this evidence to determine whether the development will be safe, will provide wider sustainability benefits that outweigh the flood risk and ultimately whether the Exception test has been passed.
- 5.30 It is recommended that applicants start with part b of paragraph 5.27 of this SPD. If it cannot be proven that the development will be safe for its lifetime it will not be possible to pass part a).
- 5.31 To demonstrate that a development can pass part b, a site specific Flood Risk Assessment will be required.

² The Flood Risk vulnerability categories are set out in the PPG: [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362822/PPG-Flood-Risk-and-Coastal-Change-2019.pdf)

- 5.32 Assistance with both the Sequential and Exception Tests can be found here: [Flood risk assessment: the sequential test for applicants - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-assessment-the-sequential-test-for-applicants)

Site-Specific Flood Risk Assessments

- 5.33 A Site-specific Flood Risk Assessment (FRA) is carried out by, or on behalf of the applicant to assess flood risk to and from a proposed development site. It must demonstrate that the development remains safe throughout its lifetime (for example raised above a certain flood level) whilst accounting for climate change and proving that flood risk elsewhere will not increase.
- 5.34 Footnote 55 of the NPPF also requires the production of a site specific Flood Risk Assessment (FRA) to be submitted with all applications that meet any of the following criteria:
- Are in Flood Zones 2 and 3
 - Flood Zone 1 if the development site is 1 hectare or more
 - Land that has been identified by the Environment Agency as having critical drainage problems
 - On land identified in the SFRA as being at future risk of flooding; or
 - On land that may be subject to other sources of flooding, where it's development would introduce a more vulnerable use.
- 5.35 A Site Specific Flood Risk Assessment checklist can be found [here](#). The latest guidance on how to apply the correct climate change allowances for flood risk assessments and SuDS design can be found [here](#). For most residential development in Fylde with a lifetime of over 100 years, the allowances are now (2023) 45% (3.3% annual exceedance probability event) and 50% (1% annual exceedance probability event). Applicants for industrial/commercial development will be expected to provide a proposed lifetime for their development so that the correct climate change allowances can be used.

Pre- Purchase and Pre-Application Advice

- 5.36 Prior to the purchase of a site it is in the developers/applicants interest to ensure that a point of outfall for drainage can be secured. The acquisition of a right to discharge and the right to lay and maintain any associated drainage pipes should be a key consideration in the acquisition of a site/completion of an agreement to promote a site for development.
- 5.37 Whilst the Council have a pre-application service to assist potential applicants on general planning matters they are unable to offer direct advice on surface water drainage arrangements. Instead, potential applicants are advised to liaise directly with Lancashire County Council as Lead Local Flood Authority. They will offer pre-application advice on surface water drainage management, SuDS and drainage strategies for developments within the Borough for a fee. Applicants will also need to consult with the Water and Wastewater company on flood risk, foul drainage and groundwater protection matters. They will also need to consult United Utilities on surface water drainage. It should also be noted that LCC Highways do not accept third party discharge into any highway drains except in exceptional

circumstances. They are currently drafting a policy document which will clarify what the exceptional circumstances will be.

- 5.38 Surface water planning advice can help developers and applicants understand the flood risk and water management issues relating to their proposal in advance of a planning application being submitted. It can indicate whether a drainage proposal would be acceptable, reduce time spent by advisers on developing a drainage strategy, help to ensure that the drainage submission is complete and identify whether specialist input is required.
- 5.39 Surface water planning advice may help to address fundamental issues, including:
- Whether an FRA needs to be submitted;
 - Confirmation of whether a Sequential/Exception test needs to be applied;
 - Whether a development has or may have water management and flooding implications;
 - Whether there are known water supply or quality issues;
 - Advice on the most appropriate form of sustainable drainage measures for the site;
 - Any known contamination issues; and
 - Clarification on climate change allowances.
- 5.40 Further information on the County Council's surface water planning advice service can be found at: [Lead local flood authority planning advice service for surface water and sustainable drainage - Lancashire County Council](#). The North West SuDS Pro-forma must be completed for any residential development of more than five dwellings and other developments with a site area of 1 ha or more or 1000 square metres of floor space, further detail on this is included at paragraphs 7.79 – 7.81.
- 5.41 Developers are also encouraged to request pre-application advice from the Environment Agency. They will provide a free high level preliminary opinion (information on the site-specific environmental issues raised by the proposal which will help developers understand any initial concerns) and chargeable detailed planning advice (e.g. reviewing FRAs and plans prior to submission to the Local Planning Authority).
- 5.42 The pre-planning application enquiry form can be found here: [Pre-planning application enquiry form \(preliminary opinion\) - GOV.UK \(www.gov.uk\)](#) and the charged environmental advice service request form can be found here: [Charged environmental advice service request form - GOV.UK \(www.gov.uk\)](#).
- 5.43 Planning application submission material should include both a sustainable surface water drainage strategy and a foul water drainage strategy. The submission of both of these documents are key to assessing the risk of sewer flooding to a proposed development. These matters should be covered in a composite document relating to drainage.

Householder Development

- 5.44 For the purpose of this SPD Householder developments are those involving built development that is undertaken within the curtilage of a dwellinghouse.
- 5.45 A simple drainage statement should accompany a householder planning application for all applications involving increases in floor area that are located in areas designated as Flood Zone 2 or 3. The necessary Environment Agency mapping can be viewed here: [Flood map for planning - GOV.UK \(flood-map-for-planning.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/flood-map-for-planning-service.gov.uk).
- 5.46 The drainage statement should identify how the surface water drainage arrangements are to be dealt with, including any attenuation and the outfall which may be through connecting to a water course or a piped sewer. If it is highlighted that there may be capacity issues in the area the statement needs to consider simple measures to reduce the quantity and flow rate of water discharged.
- 5.47 Advice on flood resilience measures (raised sockets for example) can be found here <https://www.floodguidance.co.uk/flood-guidance/flood-resilience-measures/>. Advice for flood risk and minor extensions can be found here: [Preparing a flood risk assessment: standing advice - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/preparing-a-flood-risk-assessment-standing-advice). See also <https://thefloodhub.co.uk/planning-development/> and <https://nationalfloodforum.org.uk/>
- 5.48 The paving over of gardens can have a significant impact on public sewers by increasing the flow of rainwater to the public sewer rather than allowing it to naturally infiltrate the ground. This increases the flow of water to the public sewer, which increases the likelihood of flooding and the likelihood that a public sewer will spill into a water body. The combined effect of many properties paving over gardens places a huge strain on sewers during storm events. Householders are encouraged not to pave over their gardens. However, if it is necessary, ensure that surface water can continue to drain via a permeable surface and/ or is directed to a permeable surface such as a flowerbed. In constructing householder development, please consider whether you could incorporate a rain garden. [Rain gardens \(susdrain.org\)](https://www.susdrain.org/)
- 5.49 More guidance and requirements with respect to permeable surfaces is included at 7.36-7.41.

6 Managing and Mitigating Flood Risk

- 6.1 This section will cover ways of controlling or managing flood risk through site design to ensure that all developments are safe and do not contribute to local flooding, or flooding further down the watercourse. Drainage design is intrinsically linked to wider site design. Mitigating measures may be necessary to ensure that a development is resilient to the risk of flooding from the public sewer. The information in this section is intended for use after it has been demonstrated that the location is appropriate for this type of development. Policy GD7 and Policy CL1 of the Local Plan require investigation of the suitability of sites through sequential and then exception tests.
- 6.2 Prevention and resilience measures can be designed at both a site level and property level to stop flood water entering a property. These measures will be expected to be taken into account in new development where appropriate. They can include:

Finished Floor and Ground Levels of Development and Alterations of Sewers

- 6.3 It is critical that the applicant consults with the United Utilities to understand if there are any sewerage surcharge levels at the point of connection that could influence site design both in terms of ground levels and finished floor levels. Where the ground level of a site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Where there is a risk of sewer surcharge, additional careful consideration will need to be given to site levels and whether there is a need to incorporate mitigation measures to manage the risk of sewer flooding. An applicant cannot assume that changes in levels or any proposed diversion of the public sewer system will be acceptable as such proposals could increase or displace flood risk. In such circumstances, any alteration of the public sewer could be refused by the wastewater undertaker. This could be fundamental to the detailed site design and layout see also 6.21.
- 6.4 It is also good practice to ensure that the external levels fall away from the ground floor level of proposed buildings (following any regrade) to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows.

Site Layout

- 6.5 Natural and existing artificial drainage features including sewers on sites must be identified and mapped so that they can be protected and integrated with the SuDS and wider integrated water management on the site to help reduce the causes and impacts of flooding in line with the National Planning Policy Framework. This can also help meet other environmental targets such as Biodiversity Net Gain.

Natural features include:

- ephemeral or perennial watercourses, including existing ditches;
- overland flow routes;

- floodplains;
 - wetlands;
 - permeable areas (e.g. sands and gravels);
 - zones of high water table;
 - natural depressions;
 - steep slopes; and
 - areas of peat.
- 6.6 Site layouts should be designed around these features to ensure they are protected. Buildings should not be constructed over existing drainage features, including field drains, without specific alternative flow routing capacity being provided. It is important to acknowledge that like watercourses, some public sewers will be at a higher risk of flooding and therefore these locations should also be avoided as locations for development in accordance with national planning policy. Any existing sewer flood risk should be not displaced as a result of development occurring, for example, via a proposed diversion or increase in site levels. A diversion of a public sewer could increase flood risk, either on-site or off site, and therefore applicants should not assume that a diversion will be approved by the wastewater undertaker in preparing their layout.
- 6.7 On sloping sites an assessment of the natural drainage patterns for the site and any existing flow paths and discharge points will be especially important. The assessment will need to determine how these are likely to be modified by the development proposal and identify mitigating measures to protect proposed and existing properties from flood risk. The assessment should demonstrate that existing flow paths are not displaced. Sloping sites can have existing ground water problems due to underground springs. Such issues must be considered when designing a site. There is also a risk that groundwater / overland flow could overload the drainage system that is designed as a result of illegal connections being made as an afterthought by individual residents if their plots are not drained effectively.
- 6.8 The layout of development should ensure that buildings, infrastructure and gardens are not at flood risk from all sources at the time of development and from risks which may arise in the future due to climate change. The site layout should take into account areas of flood risk present on a site and this should influence the choice of where to locate elements of the proposed development including sustainable drainage systems (SuDS) and natural flood management measures. This will guide the placement of different elements of the proposed development. If, following the application of the sequential test, areas of flood risk cannot be avoided then the more vulnerable elements of the development should be placed in areas of lowest flood risk.
- 6.9 The design and layout of a proposed development should take into account the exceedance conditions. Exceedance conditions is when the rate of runoff from whatever source exceeds the inlet capacity of the drain resulting in above ground flood flow. Without good design flood flow will follow default flood pathways which can lead to flooding of properties. Flow paths can be affected by landscaping, the location and levels of buildings and boundary treatments.

Identifying and designing in above ground flood routes can help avoid this. Development should not inhibit the function of flood flow routes.

- 6.10 The conveyance capacity of flood pathways should be designed so they can transfer the whole of the exceedance flow. This could be done by simply revising the detail of drop kerbs or lowering the highway surface. The design should ensure that water is channelled away from infrastructure into SuDS components as outlined in chapter 7.
- 6.11 There are proactive approaches to flood management by which the layout of a site can also aid the surrounding area and accommodate flood water that might contribute to flooding downstream.
- 6.12 Holding back flood flow within the site in a green corridor or the inclusion of good quality green infrastructure (including trees and other vegetation) is one method for this. The inclusion of this within a development masterplan has the potential to increase the profile and profitability of developments. For trees and vegetation to have the greatest impact in relation to alleviating flood waters, they should be planted in the form of stormwater management system that helps to reduce the speed and build-up of excess rainwater, as referenced throughout this document.
- 6.13 However, applicants should be aware that playing fields, play areas, parks and areas used for outdoor sport, open areas that make a positive contribution to the historic environment, allotments and Fylde public rights of way existing and proposed, should remain useable throughout the year to promote usage and to positively influence the health and wellbeing of residents. These areas should therefore be positively drained and included in the 'drained area' of any development proposal. Applicants should note that the connection of any land drainage to the public sewer will not be permitted by United Utilities and therefore alternative drainage arrangements to manage land drainage will need to be secured.
- 6.14 Low lying ground (greenspaces) can be designed to maximise benefits by providing flood conveyance and storage as well as amenity and environmental purposes. Structures such as public benches that are located in lower lying areas or in areas known for flooding should be resistant in design and firmly attached to the ground.
- 6.15 Land alongside a watercourse is particularly valuable in relation to improving the biodiversity offer and maximising ecological value. Retaining and enhancing ecological networks adjacent to watercourses will help to ensure that the biological and chemical quality of a watercourse is not reduced as a result of development. Based on this, it is recommended that an unobstructed buffer area, the extent of which shall be determined through an appropriate ecological assessment, is incorporated into the layout of the proposed development between watercourses and the built development. This buffer should be free from built development, lighting and formal landscaping. Any such buffer zone would need to be subject to ongoing management and maintenance by the landowner or responsible authority.
- 6.16 SuDS or Natural Flood Management should not be sited within the flood plain as they are important in reducing the risk of surface water flooding on site and cannot be utilised if

flooded from the river. Additionally, the river will fully use its floodplain and these systems in the floodplain may compromise this ability.

Floor levels in residential and non-residential development

- 6.17 Where it is not possible to avoid flood risk or minimise it through site layout, raising floor levels above the flood level is a possible option to manage flood risk to new developments. Floor levels for habitable rooms should be set above the flood level predicted for the 1:100 flood event (plus an appropriate allowance for climate change). Levels should be higher than adjacent land, highways and gardens to minimise the likelihood of runoff flowing into properties (See Appendix C).
- 6.18 Ensuring that safe access and escape will always be available to upper floors will be an essential part of design and of the ongoing maintenance and legal agreements for the development. The Defra/EA publication [‘Flood Risks to People’](#) provides further information on what is considered ‘safe.’
- 6.19 An alternative could include the placing of parking or other flood compatible uses at ground level with more vulnerable uses at higher levels. This is only appropriate for areas of low frequency flood risk and must ensure safe access and escape from the development and that the development is habitable for the duration of the flood, i.e. services to the properties will continue to function. When undertaking this approach, no built elements should interrupt flood flow paths or reduce floodplain storage capacity.
- 6.20 Single storey residential development is generally more vulnerable to flood damage as occupants do not have the opportunity to retreat to higher floor levels. For this reason, single storey housing in risk areas must provide safe refuge above the flood level.
- 6.21 In raising ground levels, it is important that consideration is made for surrounding properties and what changes the new land height may have in diverting flood flows, influencing land drainage or preventing safe access for neighbours during a flood event.
- 6.22 Any proposals to modify ground levels will need to demonstrate in the FRA that there is no increase in flood risk to the development itself or to any existing property elsewhere. Where land on site is raised above the level of the flood plain to protect properties, compensatory land must be returned to the floodplain. This is to ensure that new flood risk is not created elsewhere in an unknown or unplanned for location. Land raising would generally only be applicable on smaller development sites or for a small portion of the developable site area.

Sustainable Drainage Systems (SuDS)

- 6.23 SuDS are designed to manage flood risk and have the potential to bring about multiple benefits. Please see chapter 7 for more information.

Culverting

- 6.24 Culverting removes floodplain storage from a watercourse and can increase the risk of flooding upstream when bottlenecks or blockages occur. Culverting works against the natural processes of watercourses and significantly reduce resilience to the effects of drought, floods and pollution.
- 6.25 Other detrimental effects of culverting watercourses can also include:
- increased likelihood of flooding due to their limited capacity and propensity for blockage, both of which can result in obstructions to flow, and loss of floodwater storage;
 - exacerbating the nature of flooding by increasing flow velocities and speed of onset;
 - greater difficulties in providing for drainage connections;
 - increased liabilities and costs due to the need to maintain, repair and replace culverts or to manage upstream and downstream risks;
 - increased difficulty in detecting the origins of pollution and in monitoring water quality; and,
 - reduced resilience for communities and wildlife to the effects of extreme weather events, climate change and acute pollution.
- 6.26 The culverting of watercourses should therefore be resisted. Where possible , previously culverted watercourses should be opened up (daylighted) to create more natural drainage and reduce the likelihood of bottlenecks/blockages that can occur and cause flooding in localised areas. Any works to a culvert require consent from the LLFA under the land drainage act 1991. The LLFA has an Ordinary Watercourse Consent Service which can be found here <https://www.lancashire.gov.uk/flooding/drains-and-sewers/alterations-to-a-watercourse/>

Flood resilient construction materials

- 6.27 Where appropriate, new development should be built with flood resilient materials and construction methods. Flood-resistant construction can prevent entry of water or minimise the amount that may enter a building. This should be used in combination with other resilience measures but where appropriate new development should be built with flood resistant materials and construction methods. For example, the use of water resistant fixtures and materials for floors and walls may be appropriate alongside water resistant insulation, the siting of sockets, cables and electric appliances at higher than normal levels. Flood resilient construction may also allow buildings to recover quicker than conventional buildings following a flooding event.
- 6.28 More information on flood resilient measures can be found by following the link in paragraph 5.47.

Safe access and egress routes

- 6.29 For residential developments to be classed as 'safe', layouts should ensure that properties have safe pedestrian access and egress to and from the development.
- 6.30 In addition, vehicular access to the site should be achievable, taking into account extreme events. The production of flood plans are also recommended to aid evacuation and rescue during a flood event. Such a plan should satisfy the concerns of the local authority emergency planner and the emergency services. Safe access will also need to be considered for other vulnerable uses.

Green Infrastructure and Natural Flood Management (NFM)

"At a time when we are facing a climate emergency, we must find new ways to invest in recovery of the natural processes that protect and support us, at a scale and pace that can make a difference. Hard engineering alone will not address our future flood risk challenges and must be supplemented by natural solutions"

Mark Lloyd – CEO of the Rivers Trust

- 6.31 The inclusion of high-quality green infrastructure within a proposed development has the potential to maximise a number of benefits. It can provide flood conveyance, storage, as well as recreation, amenity and environmental benefits, which can in turn result in a net gain in biodiversity (see Fylde Biodiversity SPD) and aid health and wellbeing.
- 6.32 Natural Flood Management involves implementing measures that help to protect, restore and emulate the natural functions of catchments, floodplains, rivers and the coast (catchmentbasedapproach.org). It aims to store water in the catchment and slow the rate at which water runs off the landscape into rivers, to help reduce flood risk to communities downstream. NFM is also referred to as 'working with natural processes', 'slow the flow', 'sustainable land management' or 'upstream management'. Figure 2 provides examples of natural flood management opportunities.

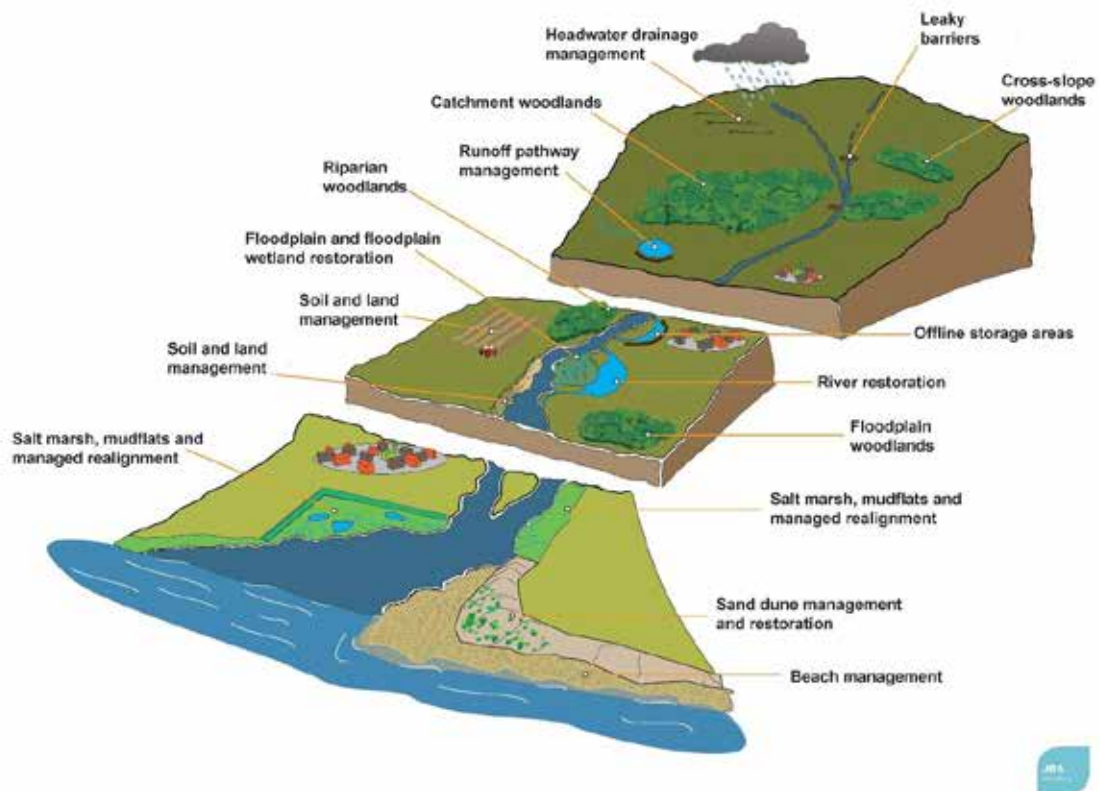


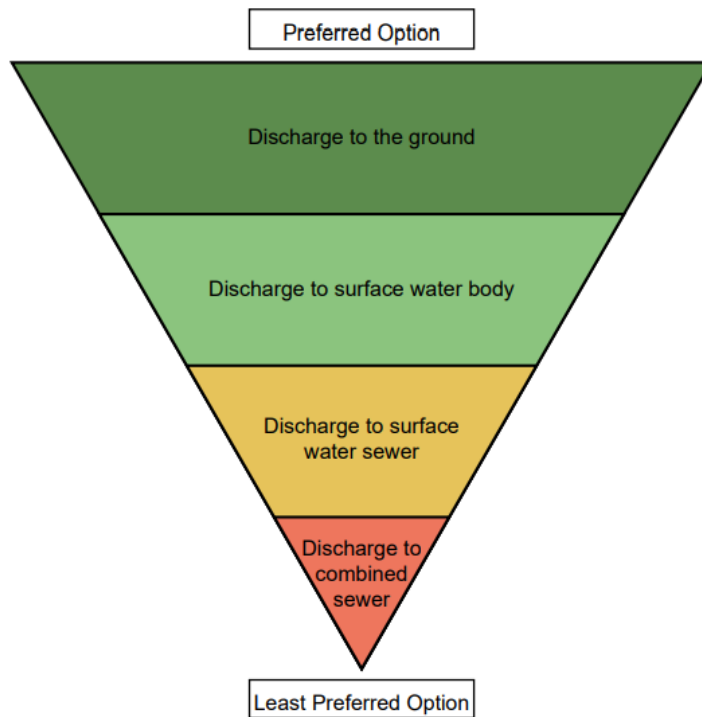
Figure 2: Natural Flood Management Techniques

- 6.33 Natural Flood Management should be integrated into the green and blue infrastructure within the development site at every possible opportunity. Opportunities to retrofit green infrastructure (GI) into urban environments will be looked upon favourably. Examples of retrofitting GI include adding green roof systems, roof gardens and green walls to existing buildings and new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).
- 6.34 Further information can be found on the Flood Hub website: <https://thefloodhub.co.uk/nfm>. Further details on Property Flood Resilience Measures is included in Appendix F.

7. Sustainable Drainage Systems (SuDS)

- 7.1 The National Planning Practice Guidance sets out The Hierarchy of Drainage to promote the use of Sustainable Drainage Systems, by aligning modern drainage systems with natural water processes. The aim of the Hierarchy of Drainage is to drain surface water run-off the most sustainable way, as is reasonably practicable.
- 7.2 The increase in infrastructure and the use of traditional drainage networks (pipes and culverts) along with combined systems for surface water and sewage, are resulting in downstream flooding and a deterioration in water quality of controlled waters, due to foul sewer overflow. Therefore, sustainable drainage systems aim to alleviate these problems by storing or re-using surface water at the source. This decreases the flow rates to watercourses and improves water quality.
- 7.3 All surface water runoff should aim to be discharged as high up the following hierarchy as possible:
- Discharge into the ground (infiltration) / re-use on site, or where not reasonably practicable;
 - Discharge to an adequate soakaway or some other form of infiltration system;
 - Discharge to a surface water body, or where not reasonably practicable;
 - Discharge to a surface water sewer, highway drain or another drainage system, or where not reasonably practicable;
 - Discharge to a combined sewer.
- 7.4 Applicants wishing to discharge surface water to a public combined sewer will need to submit clear evidence demonstrating why alternatives are not available.
- 7.5 As specified by Strategic Policy CL1 and CL2 of the Local Plan, it will be necessary to attenuate any discharge of surface water through the incorporation of SuDS following the SuDS hierarchy shown in Figure 1 below. A pumped discharge of surface water to a watercourse is sequentially preferable to any type of discharge to a sewer. Discharge to a sewer is unsustainable for a number of reasons: an increased risk of spills to watercourses from public sewers; additional energy required to treat surface water at existing wastewater treatment works; and additional energy required to pump via pumping stations on the public sewer network. For any development proposal which is part of a wider development/allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development site may not be acceptable. The LLFA will object to any proposal to pump surface water where clear and robust evidence is not provided to demonstrate why a gravitational connection cannot be provided, which is in accordance with standard S12 of Defra's technical standards for SuDS.

Figure 1: The Discharge Hierarchy



Source: Cheshire East Council

- 7.6 The different elements of the hierarchy may be used in combination and to varying degrees depending on the characteristics of the development site. The hierarchy should be followed in priority order. The aim should be to slow down and store as much water as possible using the elements at the top of the hierarchy. Where the higher elements cannot fully manage the water, the use of components lower down in the hierarchy should be kept to a minimum and only used where necessary to achieve the minimum run-off rates and to reduce flood risk on and off the site. The applicant should provide evidence to justify the use of components lower in the hierarchy.

What are SuDS?

- 7.7 Impervious areas (roads, footpaths and car parks for example) are traditionally connected to sewer systems that transport run off away from urban areas quicker than natural and vegetated areas. This can cause disruption to the natural water cycle as flows downstream can peak much faster and in greater quantities. This can exacerbate flooding and can also increase pollution in waterways.
- 7.8 SuDS are features that are designed and built into the landscape to slow, store, divert, filter and improve the quality of surface water. They are designed to manage the flood and pollution risks resulting from urban runoff by allowing rainfall to be intercepted or absorbed into the ground through vegetation and specially designed landscape features. SuDS also convey any additional flows to the nearest surface waterbody where it is discharged at the same rate and ideally, the same volume as if the site had not been developed. By mimicking natural drainage, they increase the capacity and potential of the land to regulate water, reducing demand on

the underground drainage network. They can also contribute to environment, amenity and social enhancement and can be used to provide biodiversity net gain.

7.9 The list below summarises the considerations which should be made when designing SuDS:

- Plan SuDS at start of development proposal,
- Enhance landscape through SuDS design,
- Ensure access and maintenance is feasible,
- Ensure access points to other utility assets are not compromised,
- Avoid harmful impact on the historic environment and mitigate unavoidable damage,
- Promote and encourage biodiversity,
- Reduce waste produced from SuDS,
- Replicate natural drainage and where possible avoid culverts, pipes / pumps,
- Promote water re-use,
- Maximise benefits and multi-use features,
- Future proof the design of SUDS with respect to climate change and urban creep.

The historic environment is best considered following consultation with Lancashire Historic Environment Record (HER) and by taking relevant expert advice. Lancashire County Council maintains the County HER and its Historic Environment Team can offer guidance on avoiding damage to the County's heritage. For further information please see: [Preserving Archaeological Remains | Historic England](#)

Benefits of SuDS

7.10 In 2015, CIRIA launched the SuDS manual, which stated that the overarching principle of SuDS design should be that surface water run off should be used for maximum benefit. The diagram below (Figure 2) shows the 4 main benefits and how these benefits can be delivered:

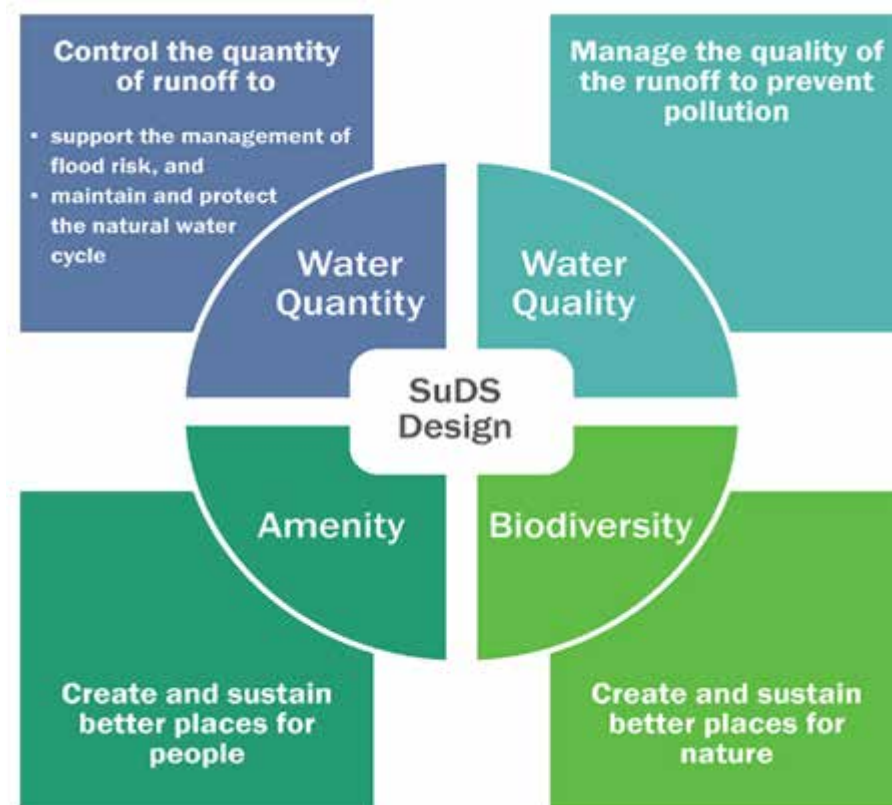






















Figure 2: The Four Pillars of SuDS – CIRIA The SuDS Manual C753

7.11 SuDS have the potential to deliver multiple social, economic and environmental benefits, most of which fit broadly into one of the 4 pillars above. In addition to managing the flows and volume of water and diffusing pollution some SuDS can positively impact on air quality, carbon reduction, recreation, education and other elements of health and wellbeing. Table 1 below provides an overview of potential benefits. There is a potential issue with the provision of SuDS in Fylde. There are two airfields, Blackpool Airport to the west and Warton Aerodrome to the south. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetland ponds and ditches provide a range of habitats for wildlife, potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation. Fylde Council will consult Warton Aerodrome (BAE) and Blackpool Airport where new development containing SuDs is proposed close to these facilities.

Table 1: SuDS Benefits

Benefit category	What it covers
 Flood risk management	Impact on people and property
 Water quality management	Surface water quality improvements to aesthetics, health, biodiversity, etc
 Biodiversity and ecology	Sites of ecological value
 Amenity	Attractiveness and desirability of an area
 Air quality	Impact on health from air pollution
 Building temperature	Thermal comfort, it cooling (summer) or insulation (winter).
 Carbon reduction and sequestration	Operational and embodied carbon reduction together with sequestration (planting)
 Crime	Crimes against people or property
 Economic growth	Business, jobs and productivity
 Education	Enhanced educational opportunities
 Enabling development	Water infrastructure capacity (headroom) for housing/other growth
 Flexible infrastructure/ climate change adaptation	Improved ability to make incremental changes and adapt infrastructure (no regrets)
 Groundwater recharge	Improved water availability or quality
 Health and wellbeing	Physical, emotional, mental health benefits from recreation and aesthetics
 Pumping wastewater	Reduced flows of wastewater to treatment works
 Rainwater harvesting	Reduced flows in sewers, pollution or dependence on potable (mains) water
 Recreation	Involvement in specific recreational activities
 Tourism	Attractiveness of tourist sites
 Traffic calming	Reducing the risk of road accidents or increasing street-based recreation opportunities
 Treating wastewater	Reduced volume of wastewater to treat from combined drainage systems

Source: Susdrain, 2022

- 7.12 The consideration of these potential benefits and opportunities should form the SuDS proposal and will help to ensure that the outcome is both successful and cost effective.
- 7.13 The best way to achieve benefits is for SuDS to be provided in above ground components. Underground storage cannot provide the 4 pillars and are not easily visible for the purposes of maintenance. However, it is recognised that a combination of above and underground components may be necessary to achieve the required rates. Therefore, above ground SuDS

are preferred, following the drainage hierarchy, with underground SuDS supported when they are provided as part of a wider SuDS scheme.

- 7.14 Applicants will be expected to design sustainable drainage in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). Drainage will be required to be considered early in the design process and linked to any strategy for landscaping, biodiversity and the public realm. Any approach to landscaping will be required to be evaluated early in the design process to identify opportunities for landscaping to be integrated with sustainable surface water management.

SuDS Management Train

- 7.15 SuDS for all areas should follow a management train to try to best reinforce the pattern of natural drainage.
- 7.16 The SuDS Management Train is fundamental to designing a successful SuDS scheme and uses a logical sequence of SuDS facilities to allow run-off to pass through several different SuDS before reaching the receiving watercourse or water bodies or having an adverse impact on surrounding land.
- 7.17 The SuDS Management Train follows a hierarchy of techniques:
- Prevention – Prevention seeks to prevent or minimise runoff and pollution through good site design; effectively to stop water entering the drainage system and prevent pollution.
 - Source control – control of run-off at, or very near, its source
 - Site control – management of run-off within the site
 - Regional control – management of run-off in the locality

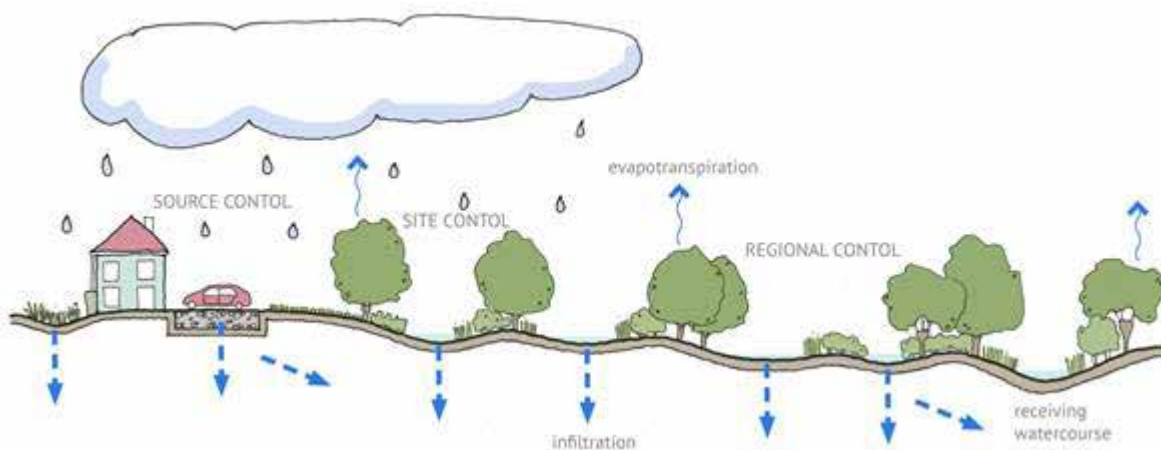


Figure 3: The Management Train (susdrain, 2022)

- 7.18 The requirements for drainage should be considered whilst determining the overall layout of the development because the site's natural features, such as a topography and soil type will dictate some aspects of the drainage system design. Runoff does not need to pass through all stages in the management train but as a general principle, it is better to deal with runoff

locally, returning the water to the natural drainage system as close to the source as possible (Susdrain, 2022).

Design Principles and SuDS techniques

Design Principles

7.19 Applications for major development will be required to incorporate sustainable drainage which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless there is clear evidence submitted to the Council which demonstrates why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain. Even on small sites where space is limited applicants will be expected to demonstrate how surface water management has been integrated within the landscaping for a site using rain gardens, tree pits and green roofs. Further information on design can be found at <https://www.susdrain.org/>

7.20 The following design principles should be included:

- Maximising multi-functionality
- Supporting and protecting natural local habitats and species
- Contributing to habitat connectivity and to the delivery of local biodiversity objectives
- Restoring and enhancing local habitats/species and habitat connectivity
- Mitigation of pollution
- Mimicking natural drainage
- Appropriate safety measures
- Accessibility
- Landscape and amenity enhancement
- Future proofing from climate change

Prevention and SuDS Techniques

7.21 When considering the water environment, preventing surface water run-off is the priority when considering the sustainability of any development. Prevention (preventing runoff by reducing impermeable areas) reduces the pressure on water catchments and on the sewerage system which is essential, especially in times of flood and can also reduce pollution in watercourses. Prevention also reduces the need for SuDS components within the development.

7.22 A number of measures can be put into place in order to reduce or prevent surface run off. For these to work, it is essential that the natural drainage of the site is understood so the layout can be integrated effectively.

7.23 Surface runoff prevention measures include:

- Minimise the extent of hard surfacing

- Utilise softer surfacing such as reducing paved driveway space
- Retain the maximum extent of natural soils
- Manage soils to preserve and improve their depth, porosity, permeability and long-term health
- Retain the maximum scale of existing vegetation on site
- Increase vegetation where possible and appropriate eg hedges rather than fences, plus trees wherever appropriate

7.24 All proposals are required to give priority to the prevention stage to reduce the need to move further down the drainage hierarchy.

7.25 The suitability of each SuDS approach will depend on a variety of different factors including the type of scheme, the catchment and the local geology and hydrology. The priority is to reduce the amount of water which needs to be actively drained from a site. It is important that sufficient storage is incorporated within all drainage systems to allow for rain events up to a 1% annual probability (1 in 100) and an allowance for climate change.

7.26 Examples of SuDS techniques, following the management train, can be found below:

7.27 **Source Control**

- Rainwater harvesting

7.28 Rainwater harvesting is an efficient way to use water. It is described as rainwater that is:

- Ø Collected from roofs or other above ground surfaces
- Ø Collected via a system of above ground pipes and tanks
- Ø Isolated from inland waters or groundwater

7.29 It includes water that is collected from impermeable surfaces via interception. Whilst not used for drinking, water harvested in this way can be used for flushing toilets, supplying washing machines and watering the garden. As a result, rainwater harvesting can be used as a sustainable water supply, reducing the dependence on water from the mains supply and also reducing flood risk. A rainwater harvesting system diagram is depicted in Figure 4.

7.30 Rainwater harvesting can take on a variety of forms in different situations. The most basic rainwater harvesting systems include a way to collect the rain (roof of a house), a way to direct the water (like a gutter and downspout) and a place to store the water (a barrel or water butt). Water butts are the most common means of rainwater harvesting, especially within a residential context.

7.31 More complex harvesting systems can provide benefits within and outside of buildings. These would provide more potential end uses for the water. More complex systems could include a collection system and layers of filters to keep dirt and debris out of the water supply. The incorporation of any rainwater harvesting must be carefully considered and meet all regulatory requirements. It is critical that expert advice and any relevant approvals are

obtained to prevent any cross contamination of rainwater into the mains water pipework system.

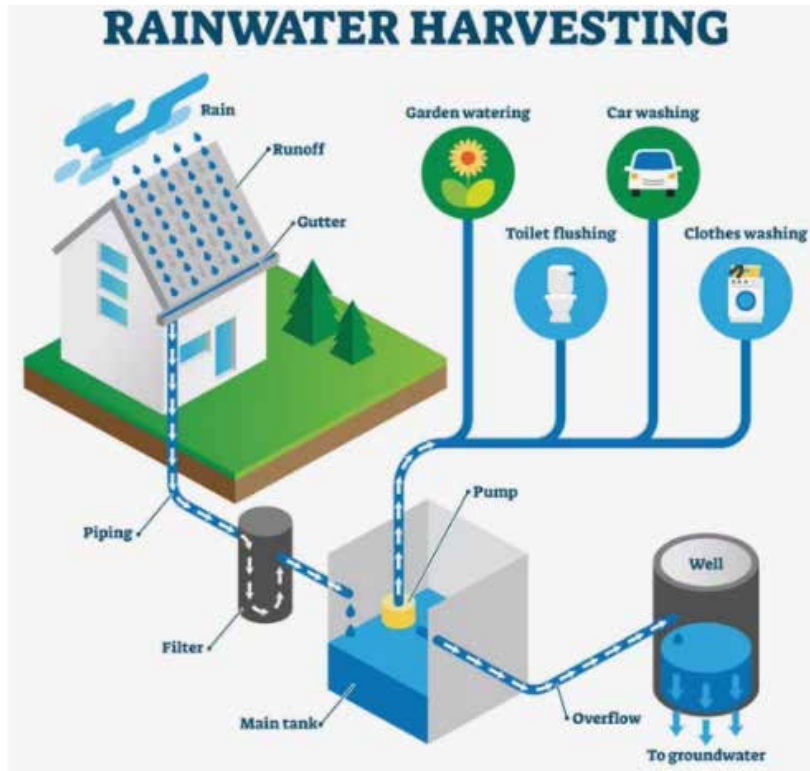


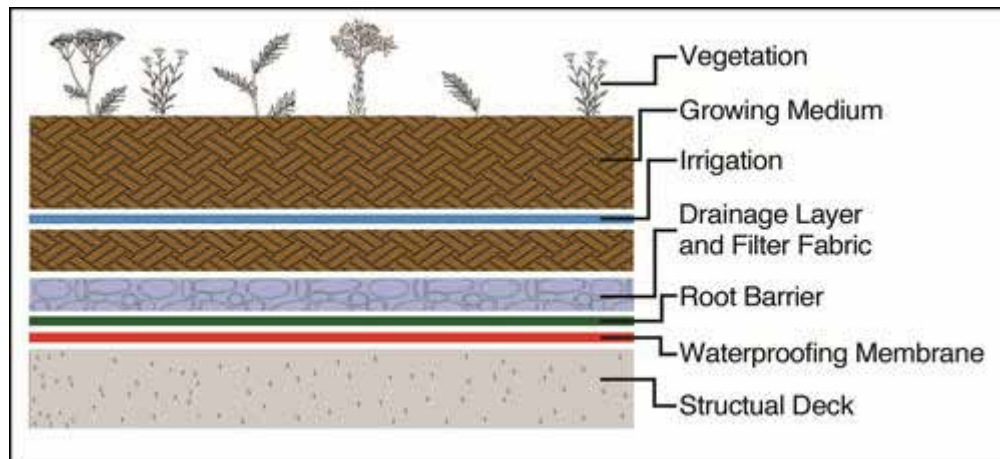
Figure 4: Rainwater harvesting system diagram with hose roof water runoff, underground piping, filtering, collecting in tank for domestic use. Source: Treehugger, Sept 2022

- 7.32 Rainwater harvesting systems are encouraged by the Council. The systems will need to include storage that is specific for its intended use. Storage tanks should be placed in secure locations and are commonly fitted underground, on roofs and adjacent to buildings. Any underground storage tanks must be accessible for maintenance.
- 7.33 Maintenance requirements are specific to each system. Future maintenance arrangements should be addressed in the earliest stages of the planning process.
- 7.34 Anyone purchasing a property with a rainwater harvesting system installed should be provided with information as to what has been installed and how to maintain it correctly. Information should include:
- Ø The purpose of the system
 - Ø Its maintenance requirements
 - Ø Actions required in the event of failure
 - Ø The expected performance of the system

- 7.35 It should be noted that storage provided through water re-use methods like rainwater harvesting is not usually counted towards the provision of on-site storage for surface water balancing. This is because there may be times where the water is not re-used as hoped (e.g. for watering gardens or flushing toilets) and therefore storage will not be available for each new rain event.
- Permeable surfaces
- 7.36 Permeable paving is used as a general term, but two types can be distinguished:
- Ø Porous paving – where water is infiltrated across its whole surface
 - Ø Permeable paving - has a surface that is formed of material that is itself impermeable to water. The materials are positioned to provide void space through the surface towards the sub-base³.
- 7.37 Permeable surfaces can be very effective at controlling surface water runoff. They allow infiltration of rainwater through their surface into the underlying construction or soil. This could be gravel, permeable hard surfacing or block paving, porous tarmac, and porous concrete. Storage can be created in the sub-base below with water then infiltrating into the ground or passing through to an outfall (usually another SuDS component). Permeable surfaces can also be very effective at removing a wide range of pollutants.
- 7.38 Permeable paving is a suitable SuDS feature for a variety of sites. It is most commonly used on roads and car parks but the measure can also apply to broader use of permeable areas to promote greater infiltration.
- 7.39 In accordance with Local Plan Policy CL2 the Council will require that **all** newly-laid parking areas are constructed using porous/permeable paving, as described in Approved Document H of the Building Regulations, unless the applicant can demonstrate to the satisfaction of the Council and the Lead Local Flood Authority that this is not possible. Further guidance can be found in the Parking in New Developments Supplementary Planning Document.
- 7.40 The extent of any artificial surfacing should be minimised to promote vegetation, preserve soils and encourage natural drainage.
- 7.41 Regular inspection and maintenance will be expected to ensure infiltration capacity is preserved.
- Living roofs and walls
- 7.42 Living roofs/walls are multi layered systems that cover the roof or walls of a building with vegetation cover/landscaping and are very effective as part of an overall SuDS approach. The roof/wall is likely to consist of an impermeable layer, a substrate and a draining layer as shown in Figure 5.

³ Concrete block permeable paving must be designed in relation to British standard BS 7533-13:2009.

Figure 5: A green roof section, showing the layers of a green roof.



Source: [About Green Roofs — Green Roofs for Healthy Cities](#)

- 7.43 Living roofs/walls reduce runoff by storing water, by the plants using the water, and by evapotranspiration. They can also provide insulation, increase carbon absorption and be visually appealing in the right setting.
- 7.44 Depending on the context of the application site/development, buildings should be designed to accommodate living roofs/walls. Every effort should be made to take advantage of the multifunctional nature of living roofs/walls and capitalise on their ability to provide additional amenity, placemaking and biodiversity benefits.
- 7.45 Careful consideration should be given towards the solar aspect of the location and choice of growing mediums (this will affect water storage capacity and planting choices) to maximise effectiveness.

Figure 6: Green Wall at the Blackpool and Fylde College



Source: [ansgroupglobal.com](#), 2017

- Swales and filter strips

- 7.46 Swales and filter strips are simple and yet very effective in managing surface water run-off. They are designed to mimic natural drainage patterns by allowing water to run in sheets through vegetation, slowing and filtering the flow.
- 7.47 Swales are very shallow channels that are used to collect, move and remove pollution from water. They can be covered by vegetation and have shallow side slopes and a flat bottom so that water can flow in a thin layer through the vegetation.
- 7.48 Filter strips are gently sloping areas of grass that water flows onto or across, usually towards a swale or filter drain. The main purpose of the filter strip is to remove any silt in the water so that it does not clog up the swale or filter drain.
- 7.49 The profile of a swale will depend on specific ground levels, topography and ground/soil conditions present at the site. Their orientation, aspect and proximity to other landscape features and buildings etc. The swale should respect the surrounding landscape in terms of scale and form. The design should contribute to the amenity of the local area and angular shapes, hard edges and straight lines should be avoided in green open spaces.
- 7.50 Swales should take trees into consideration, especially in ensuring that their root systems are not compromised. Every attempt should be made to retain existing trees and vegetation.
- 7.51 Access should be provided to all areas of the swale for inspection and maintenance. All maintenance access points shall be clearly visible and documented in the Maintenance plan.

7.52 **Site Control**

- 7.53 This describes those SuDS features within or at the edge of developments that provide a second or third treatment stage including storage for run-off that has been conveyed from source control structures (e.g. from green roof or rain garden). Site controlled SuDs cover the entire development site and tend to include larger scale methods mixed with the smaller scale products. The types of SuDs used are similar to regional control examples, differing only in scale.

- Detention basins

- 7.54 Detention basins are surface storage basins that assist in controlling water flow through the attenuation of stormwater runoff. They are designed to retain flood events, reducing peak flows and limiting the risk of flooding. Water accumulated in the basin is either slowly discharged to the next SuDS component or to a receiving watercourse.
- 7.55 Detention basins are normally flat bottomed, dry areas of grass (except after storm events) and the land may also function as a recreational facility and help to improve ecological value in the area.

- 7.56 The inclusion of detention basins in a SuDS installation can provide aesthetic benefit to public areas, visual quality and habitat creation. Detention basins provide a useful stage in pollution control, facilitating the settling of particulate pollutants. The slowing of flows allows settlement of suspended solids and allows biological uptake of pollutants by plants, algae, and bacteria.
- 7.57 Consideration should be given to the suitable aesthetic design of the detention basin and its surrounds to enhance the visual amenity of the site and to reflect the landscape character of its location.
- 7.58 An irregular shape should be used for maximising the aesthetic aspect of the detention basins. Angular shapes should be avoided in the design of basin process.
- 7.59 Proposed vegetation shall comprise native species tolerant of the anticipated soil-types, water tolerance requirements, microclimate and climate change.
- Underground storage
- 7.60 Underground storage should only be utilised when ground space is not available.
- 7.61 Any underground storage structure must be part of a wider SuDS management train. This is because water treatment is not provided in underground storage and therefore, the water must be cleaned before it moves further down the watercourse.
- 7.62 Designs should consider expected and potential loading to avoid structural failure and collapse.
- 7.63 It is crucial, that given the hidden nature of underground components, the operation and maintenance must be integrated into the design and monitoring and maintenance responsibility must be confirmed.
- 7.64 **Regional Control**
- 7.65 Regional controlled SuDs can cover multiple developments within an area and tend to be on a much larger scale, draining to a particular body of water.
- Retention pond and associated wetlands
- 7.66 Regional features use the landscape to manage large volumes of relatively clean run-off in temporary basins (see detention basins above), permanent balancing ponds and wetlands. Wetlands are varied and include seasonally flooded woodland and grassland habitats, more permanently wet fens, reedbeds and marshes.
- 7.67 Retention basins are an example of regional control. They are dry depressions in the ground designed with additional storage to attenuate surface runoff during rainfall or storm events,

provide additional storage and an element of pollution removal⁴. They can also be designed to function as recreational areas.

- 7.68 Retention basins tend to be found at the end of the SuDS management train so are used if extended treatment of the runoff is required or if they are required for landscape or wildlife reasons (susdrain, 2022).
- 7.69 Where retention basins are appropriate consideration should be given to the suitable aesthetic design of the retention basin and its surroundings to enhance the visual amenity of the site and to reflect the landscape character of its location.
- 7.70 An irregular shape should be used in order to minimise the manufactured appearance of the pond. Angular shapes should be avoided as far as practical in the design of basin elements to maximise the aesthetic aspect of the retention basins.
- 7.71 Where appropriate, the planting of native trees, shrubs and marginal vegetation and flower rich buffer zones should be considered to enhance the wildlife and landscape offer.
- 7.72 Where possible wetlands should be the last stage of the SuDS management train and should be one of the last treatment stages. Wetlands can be constructed on a variety of different scales, and must be appropriately sized for the catchment.
- 7.73 Upstream SuDS components reduce the flow and level of siltation allowing wetlands and ponds to polish the runoff. This is achieved by ensuring water flows slowly through the wetland over an extended period of time. An important mechanism is also the breakdown of oils by natural organisms. This requires an appropriate supply of oxygen which means the permanent water must be shallow enough so that oxygen can reach the bottom of the wetland.

Retrofitting

- 7.74 Retrofitting of sustainable drainage systems (SuDS) particularly in the urban area is also something that the Council is looking to promote where possible.
- 7.75 Retrofitting SuDS helps to provide a more joined up approach to managing surface water across the Borough and supporting the water cycle as a whole. Retrofitting also helps to 'green' existing urban areas and generates other benefits such as improved bio-diversity and public realm. SuDS can also be cheaper than traditional drainage solutions.
- 7.76 The method of SuDS intervention to be retrofitted will be dependent on the site circumstances. In all circumstances retrofitting of SuDS should seek to offer additional benefits in terms of water quality, amenity, biodiversity and landscape.
- 7.77 A baseline minimum level of betterment of at least 30% reduction in discharge rates is expected on all previously developed sites. Local circumstances may dictate a higher level of betterment will be required.

⁴ Regional controls should not receive significant pollutants, which are best managed by upstream facilities.

- 7.78 Early advice on the technical requirements for retrofitting SuDS schemes can be sought from United Utilities and Lancashire County Council (Lead Local Flood Authority).

SuDS Pro-forma

- 7.79 The SuDS pro-forma and accompanying guidance has been sponsored and endorsed by the North West Regional Flood and Coastal Committee. It has been developed by a task force of representatives from United Utilities and North West Local Authorities, all of whom may need to be consulted on surface water drainage matters. Providing the correct evidence and information required in the SuDS Pro-Forma will minimise the potential for delays arising from inadequate information.
- 7.80 Completion of the SuDS pro-forma is required in the following circumstances:
- Any residential development of 5 or more dwellings
 - Other development with a site area of 1 hectare or more or 1,000 square metres of floor space
- 7.81 The SuDS pro-forma template can be found at [NW-SuDS-Pro-forma-v.5.-May-2022-002.pdf \(thefloodhub.co.uk\)](#). Guidance to support the completion of the SuDS Pro-Forma can be found on the Flood Hub website: <https://thefloodhub.co.uk/planning-development/#section-5>

Maintenance and Adoption

Maintenance

- 7.82 When designing SuDS or any surface water drainage scheme, it is essential to consider at all stages of the planning, design and construction process, how features will be maintained and accessed, who is responsible for the lifetime of the development and the likely costs. It should be shown where necessary that an agreement has been made with those in charge of the maintenance. SuDS should be designed to be visible and function under predicted loading conditions over the life of the development. This will enable those responsible for maintenance to easily identify and resolve problems as they occur. Above ground SuDS are easier to monitor and to identify when occasional or remedial maintenance is required. The provision of above ground SuDS therefore has longer term benefits for ensuring that SuDS remain effective and financially sustainable in the long term. For this reason, above ground SuDS are preferred by the Council as mentioned in paragraph 7.13.
- 7.83 The maintenance and management of SuDS should be documented within a SuDS management plan, which should form part of the information submitted by the applicant at planning application stage.
- 7.84 The approved management plan must include information on the safe operation, design assumptions, how SuDS components interact as well as the maintenance of these components. An estimate of ongoing maintenance costs must be included. Where

appropriate, contingency arrangements must be made. A well-designed SuDS will ensure that maintenance is feasible, cost-efficient and easy to undertake. There is likely to be some cross over between the maintenance of green and blue infrastructure e.g. grass cutting, shrubs/tree management, wetland management and so care should be taken to ensure management is in line with existing practices. Additionally, care and consideration of the method and timing of operations should be taken, for example, avoiding weed cutting during nesting season.

7.85 An example of what a SuDS Management Plan should include can be found below.

SuDS management plan flowchart



7.86 As mentioned, maintenance of SuDS components is important to ensure their ongoing effectiveness. The table below identifies the principal “Frequent”, “Occasional” and “Remedial” maintenance works for a range of SuDS components.

7.87 The maintenance requirements and frequency shown within Part D of the **CIRIA SuDS Manual C753 Chapter 32** are a good example of what should be provided.

Table 2: Example Maintenance Works for SuDS

Frequent Maintenance		Occasional Maintenance		Remedial Maintenance	
Frequency	Daily or monthly activities for normal care of SuDS	Frequency	Determined on a site to site basis	Frequency	As required
Potential Tasks	-Litter picking -Grass cutting to correct level -Inspection of inlets, outlets and control structures	Potential Tasks	-silt control around components -vegetation management around components to prevent blockages -suction sweeping of permeable paving -silt removal from catchpits, soakaways and cellular storage	Potential Tasks	-inlet/outlet repair -erosion repairs -reinstatement of edgings -reinstatement following pollution -removal of silt build up.

7.88 Compliance with the proposed maintenance strategy for a site will typically be required by planning condition. Additionally, the Local Planning Authority request that yearly logs are maintained and are made available upon request.

7.89 Education through interaction with local residents and future homeowners is a valuable way to ensure that features are maintained. If those benefiting from the features understand what the SuDS are there for and how they work, they may be more inclined to ensure that they are kept clean and in good working order.

Adoption

7.90 In order to meet the adoption criteria for United Utilities, the SuDS must be constructed to an adoptable standard taking into consideration DEFRA Technical Standards for SuDS and CIRIA The SuDS Manual C753 (or updates or replacement guidance or legislation).

7.91 The following examples are of systems, components or features which may be adoptable as a public surface water sewer:

- Detention basins,
- Swales,
- Small streams,
- Under-drained swales,
- Ponds/wetlands; and,
- Infiltration basins and soakaways

- 7.92 In all these cases, the system carries away surface water from buildings and surrounding land, such as hardstanding around a house, and, via a defined channel, returns it to the ground or to another body of water such as a stream or river (water.org.uk, 2020).

The Council's preferred approach for the long-term management and maintenance of SuDS is for adoption by a Statutory Undertaker. Early engagement with the Lead Local Flood Authority, the LPA and United Utilities is essential early on to explore mechanisms for adoption. United Utilities has a pre-development service team to assist with this: [Planning - United Utilities](#). Lancashire LLFA also has a Surface Water Planning Advice Service, further information can be found at <https://www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/lead-local-flood-authority-planning-advice-service-for-surface-water-and-sustainable-drainage/>

- 7.93 If the SuDS are not suitable for adoption by a water or sewage company, a condition will be added to any planning approval to ensure long term maintenance by the developer.

Private Management

- 7.94 Only SuDS serving an individual property and within the boundaries of that property should fall to the responsibility of the property owner. In this case, it is recommended that details regarding the maintenance are included in information given to the owner/occupier. This is particularly important for permeable paving of private drives, soakaways serving an individual property, green roofs and rainwater harvesting systems as these SuDS components are excluded from adoption.
- 7.95 In circumstances where a management company is required to maintain the SuDS, a legal agreement tied to the title of the property will need to be agreed with the Council as LPA (usually through a Section 106 agreement). Evidence should also be provided by the applicant on the suitability and experience of the management company during the pre-application and planning process.
- 7.96 More information on the adoption of SuDS can be found here [09_15_fact_sheet_suds_maintenance_and_adoption_options_england_.pdf \(susdrain.org\)](#)

8 Water Quality and Pollution Control

- 8.1 LPA's have a general responsibility as part of the decision making on planning applications, not to compromise the aims of the UK's Water Framework Directive which includes the water environment absolute, including bathing waters and the groundwater environment. Water quality improvements and a healthy water environment also bring about numerous benefits, including aesthetic, health (e.g. reduced risk of infection from bathing) or enhanced recreation, and opportunities for wildlife and biodiversity.
- 8.2 Large areas of hardstanding such as paved surfaces can result in surplus run off, exacerbating flooding, causing pollution and reducing natural infiltration. This can directly lead to water quality problems, by accumulating pollutants as water runs over land. Runoff from roads will also contain heavy metals and hydrocarbons and run-off from farmland is more likely to contain nitrates and sediment. These can have serious implications for water quality, biodiversity and amenity. Developers should incorporate pollution prevention measures to protect ground and surface water. The latest Pollution Prevention Guidance is available [here](#). The Environment Agency's groundwater position statement can be viewed [here](#).
- 8.3 Strategic Policy CL1 of the Fylde Local Plan to 2032 (incorporating Partial Review) states that all new development is required to retain water quality. Therefore, applicants must anticipate any likely negative effects of proposals on water resources and incorporate adequate mitigation measures where necessary. Applicants are required to:
1. **Identify if a proposed application is near a watercourse.**
- 8.4 The Environment Agency's [mapping system](#) will assist applicants in identifying any main rivers in the proximity of a development. Government guidance provides assistance on determining whether or not you are responsible for any other watercourse (non-main rivers, ditches, streams for example: [Owning a watercourse - GOV.UK \(www.gov.uk\)](#))
2. **Assess whether the proposed development will have any negative effects on the watercourse.**
- 8.5 The location and type of development can result in water quality issues for a number of direct reasons including physical modifications to a water body such as dredging, removing natural barriers and new culverts for example. Indirect impacts include land contamination from previously developed sites, wastewater treatment or leaching from farms. Small scale developments can result in water pollution from toxic substances entering soil, water via drains or directly into water bodies, the inappropriate disposal of site waste or the inappropriate treatment of wastewater during construction.

3. Set out any mitigation measures that might be necessary to mitigate any identified negative impacts on the watercourse.

8.6 If it is concluded that a proposed development would have any negative impacts on a watercourse, an applicant is required to show what mitigation measures are proposed. Examples of mitigation measures at construction stage include:

- all construction waste materials being stored within the confines of the site prior to removal to a permitted waste facility
- all materials used for the construction of the site **not** coming into contact with any water body at any stage
- appropriate construction to avoid leaching in certain cases (manure/slurry stores on farms)
- the incorporation of sustainable drainage systems to minimise pollution risk
- introduce buffer zones to mitigate run off into watercourses.

Pollution Control

8.7 Some pollution arising from surface water run off may be unavoidable and water treatment at every ideal location may be impractical. Despite this, moderating flows and filtering run off through SuDS can significantly reduce the impact on the water resource by means of ground infiltration, filtration and sub-base (underground) storage.

8.8 Applicants will be required to use mitigation measures to minimise pollution within new developments. Supporting documentation accompanying planning applications for developments **over 10 dwellings** should explain how contaminated water arising through the construction process will be addressed. If necessary and appropriate, the local planning authority can attach a condition to a planning permission requiring appropriate mitigation measures to be provided in a development scheme.

8.9 Many of the SuDS discussed in chapter 7 can reduce pollution in water. These are examined further below :

- Infiltration trenches

Infiltration trenches comprise stone filled reservoirs to which storm water run-off is diverted, and from which the water gradually infiltrates the ground. Infiltration is unlikely to be successful in clay soils, which are common in Fylde, and therefore a soil analysis will therefore be required for any development proposal of over 10 dwellings to demonstrate whether this approach would be effective.

- Detention Basins and Ponds

Detention Basins and Ponds remove pollution by a range of chemical, physical and biological processes. Pollutant removal is by absorption, filtering and microbial decomposition in the surrounding soil. Systems can be designed which successfully incorporate both infiltration and filter systems. Detention basins and ponds must be

sensitively designed so as to maximise their biodiversity potential and will be encouraged where feasible. Please see paragraphs 7.63 – 7.66 of [Fylde-Biodiversity-SPD-Adopted-11-September-2019-FINAL.pdf](#) for more information.

- Filter drains

Filter drains are gravel filled trenches that collect and move water. They also treat pollution. The trench is filled with free draining gravel and often has a perforated pipe in the bottom to collect the water. In Fylde, it will be important to keep filter drains shallow because of the flat landscape. Where filter drains meet ponds or basins, this will keep them shallower. It will also help prevent problems meeting shallow outfall points.

- Permeable paving

Permeable paving is very effective at removing a wide range of pollutants from runoff, so improving water quality. The pollutants may either remain on the surface or be flushed into the underlying pavement layers, where many are filtered and trapped and degrade over time. Permeable paving can maximize opportunities for using space in a multi-functional way requiring no additional land take. They are not solely infiltration systems, do not have onerous maintenance requirements and can accommodate heavier traffic (including construction traffic). In addition, there is also evidence to show whole life costs can be significantly lower than a conventional 'pipe' system, as the future maintenance requirement is low and they negate the need for grates, gullies, expensive flow control structures, extensive lengths of pipework, oil separators etc.



Figure 7: An example of permeable paving at Lytham Park Cemetery and Crematorium

- Buffer Zones

Reducing domestic, highway, commercial and industrial diffuse pollution and maintaining water quality targets is challenging. This emphasises the need for enhanced protection of watercourses by containing the source of pollution through good practice and interrupting pollutant pathways for both surface and sub surface routes. Having landscaped buffer zones along the margins of development sites (where there is an adjacent watercourse) and around SuDs will provide many benefits including improved water quality, reduced run off rates, amenity and biodiversity. Improving the effectiveness of landscaped buffers will reduce the pollutant loads leaving a development site and entering the adjacent water.

- 8.10 The incorporation of one or more of these methods into developments is supported.
- 8.11 Pollution can also be caused by means other than built development. Fylde is a predominantly rural Borough with livestock and dairy farming representing the major agricultural land use in the Borough (Lancashire.gov.uk). Poorly constructed manure/slurry/silage stores can result in leaching which has the potential to pollute water courses, lakes, the Lancaster Canal and ground water through run off drainage.
- 8.12 Applicants can find good practice guidance from the Department for Environment Food and Rural Affairs (DEFRA) [Catchment Sensitive Farming: advice for farmers and land managers - GOV.UK \(www.gov.uk\)](http://www.gov.uk). Additional information can be found in the Guide for Manure Management [Rules for farmers and land managers to prevent water pollution - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- 8.13 The applicant must ensure that storage facilities for livestock manure/slurry and silage effluent are maintained free from structural defect and are of sufficient standard (capacity) to prevent run-off or the seepage of the contents to groundwater.
- 8.14 Clean fresh water from roofs or clean yards can be collected in large volumes. To minimise the environmental impact of the farm, this should not be mixed in with dirty water or slurry but diverted directly to a drain or ditch or, better still, stored for use on the farm.
- 8.15 If rainwater harvesting is conducted correctly, it could reduce the amount of water mixing with manure/slurry significantly and subsequently reduce the likelihood of it polluting clean water sources. Therefore, mechanisms for rainwater harvesting are encouraged. These should be distanced/separated from dirty water to prevent mixing. The overall objective being to maximise the amount of clean water that is reused on the farm, or diverted directly to a drain or ditch. This will benefit the farmer by reducing the volume of dirty water/slurry that needs to be stored and spread on the land when conditions are right.
- 8.16 Other useful sources of information can be found on gov.uk in relation to [Storing silage, slurry and agricultural fuel oil - GOV.UK \(www.gov.uk\)](http://www.gov.uk).
- 8.17 The Council will work with the Canal and River Trust to protect the water quality of the Lancaster Canal.

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Appendices

Appendix A

Strategic Policy CL1: Flood Alleviation, Water Quality and Water Efficiency

Strategic Policy CL1

Flood Alleviation, Water Quality and Water Efficiency

Planning decisions should follow the sequential, risk-based approach to the location of development, as required by the Framework.

All new development is required to minimise flood risk impacts on the environment, retain water quality and water efficiency, and mitigate against the likely effects of climate change on present and future generations.

This will be achieved by:

- a) Ensuring that development incorporates the most sustainable form of managing surface water, subject to the requirement for approval from the drainage authority. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems (SuDS), following the SuDS hierarchy. This would be greenfield run-off rate on greenfield sites. On previously developed land, surface water betterment will be expected. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. The priority options for the management of surface water are set out in detail in the Infrastructure Delivery Plan.
- b) Supporting the retrofitting of SuDS in locations that generate surface water run-off.
- c) Improving water efficiency standards by minimising the use of potable mains water in new development and incorporating measures to recycle and conserve water resources.
- d) Ensuring that new development is directed away from areas at high risk of flooding and incorporating appropriate mitigation against flooding in areas of lower risk.
- e) Ensuring that watercourses, which require watercourse consent are protected from encroachment and adverse impacts and that water quality is maintained and improved.
- f) Seeking to maximise the potential of the Green Infrastructure network within developments to reduce the risk of flooding.
- g) Ensuring that new development does not adversely affect the quality of surface and groundwater resources in Source Protection Zones and where possible contributes towards improving it.
- h) Ensuring there is no risk of pollution to controlled waters from land contamination on previously developed sites.
- i) Ensuring that the layout of new sea defences and coastal protection measures are of an appropriately robust design and are fit for purpose.
- j) Ensuring that wherever necessary land is identified to be used for wetland or flood storage through negotiation with landowners.

Developer contributions will be required for the provision and maintenance of SuDS, where this is not provided as part of the development. Contributions will be made through Section 106 agreements or the Community Infrastructure Levy (CIL), as set out in policy **INF2**.

Developer contributions will be required for the repair or replacement of the sea defences and coastal protection measures and the maintenance of the sand dunes system. Developer contributions will be made through the CIL. Where appropriate, the Council will permit developers to provide the necessary infrastructure themselves as part of their development proposals, rather than making financial contributions.

Strategic Policy CL2: Surface Water Run Off and Sustainable Drainage

Strategic Policy CL2**Surface Water Run-Off and Sustainable Drainage**

Discharge rates should be agreed as part of any pre-application negotiations between the relevant parties. New development must incorporate the following sequential attenuation measures:

- a. Store rainwater for later use; or
- b. The first 5mm of rainfall should infiltrate. In areas where infiltration rates are slow, e.g. soils with a high proportion of clay, then permeable surfaces may be under-drained. This will have the effect of slowed surface water run-off rates; or
- c. Attenuate rainwater in ponds or open features for gradual release into the watercourse; or
- d. Attenuate rainwater by storing in tanks or sealed water features for gradual release into a watercourse.

Where compelling and detailed evidence demonstrates that the above measures are not feasible or would adversely affect viability, then the following **national discharge (SuDS) hierarchy** will be considered in priority order:

1. Controlled discharge of rainwater direct to a watercourse;
2. Controlled discharge of rainwater to a surface water drain;

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Fylde Local Plan to 2032 (incorporating Partial Review)

3. Controlled discharge of rainwater to the combined sewer.

Development must utilise Sustainable Drainage Systems (SuDs) whenever practical; and reduce discharge to greenfield run-off rates wherever feasible.

Proposals for development that will discharge surface water to a public sewer must provide compelling evidence that capacity exists in the public sewer including relevant authorisation from the appropriate infrastructure provider. Where there is no public sewer capacity the applicant must provide a detailed technical assessment of how surface drainage will be dealt with. Proposals may also need to include an independent assessment of potential solutions, the cost of which must be met by the applicant.

Proposals may also be required to provide a feasibility assessment for the use of SuDs including consideration of the potential design of any scheme and ongoing maintenance arrangements. The applicant and the Council will then agree on who should adopt the scheme and be responsible for ongoing maintenance. In the majority of cases the latter will rest with the applicant.

New development will be subject to appropriate conditions or a legal agreement to secure the implementation of SuDS and to secure appropriate management and maintenance measures.

Appendix B Table 2: Flood risk vulnerability and flood zone 'incompatibility'

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	X	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

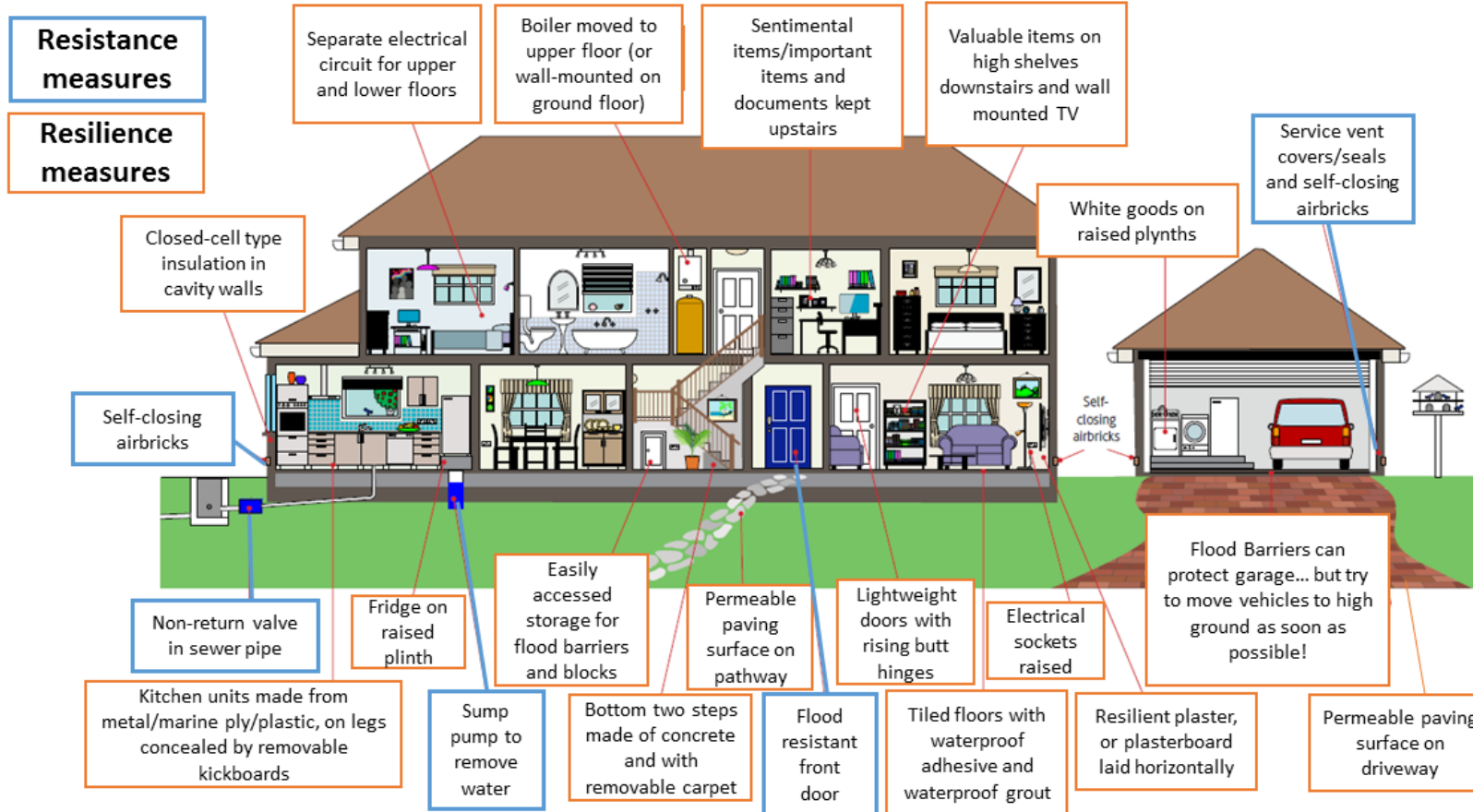
Planning Practice Guidance

Paragraph 078 Reference ID:7-078-20220825 Revision Date 25 08 2022

Appendix C

Combined resistance and resilience measures

Keeping water out for as long as possible buys valuable time to raise/move your belongings...



Source: Citizen Space – York Flood Alleviation Scheme

Appendix D

Case Studies

Fylde Council SuDS Project

To reduce the waterlogging to the eastern extent of the cemetery and provide formal memorial foundations with maintainable drainage and, to address the introduction of a new visitor parking area (980m²) with additional access roads, utilising Sustainable Drainage Systems.

The site is not formally drained and is therefore considered to be 100% permeable. Generally, the site is Devensian Till overlying Singleton Mudstone. However, it is known that there are pockets of wind-blown sand and peat on the site.

The increased area of hardstanding and access road resulted in an increase in surface water runoff rates and volumes, discharge is controlled from the detention basin before passing through an existing small wastewater treatment facility. Storage volume in the detention basin was calculated as 344m³ for the 6hr, 1 in 100-year rainfall event plus 40% climate change allowance.

The area of the proposed detention basin was discovered to have at its base granular deposits thus some infiltration proved possible. Likewise, the proposed area of the visitor parking also had a formation which allowed a permeable paved construction. Shallow swales were constructed to three sides of the parking area to contain and channel any overflow to green areas around the periphery.

Drainage beneath the memorial slabs comprised a half-perforated pipe, with crushed stone no-fines media, wrapped in filter media, in the form of trench drains. Thus, providing additional storage and filtration. Oversize carrier drains to the detention basin provide additional online attenuation within the pipe network. The extent of the existing burial plots throughout the site meant great care had to be taken during construction. The principal drainage areas are indicated in red below (Text taken from [Local Flood Risk Management Strategy for Lancashire 2021-2027](#)).

Figure 8: Fylde Council SuDS



Susdrain provide comprehensive case studies on well implemented SuDS including:

- [Queen Caroline Estate, London](#)
- [Morelands Junior School, Sale](#)

Appendix E

Riparian owner

Is defined as, 'Somebody who has a watercourse, such as a river, stream or beck, which runs through, beneath or adjacent to the boundary of their property. They are responsible for maintaining the bed and banks of the watercourse, which is on their property. Also known as a 'watercourse owner'.

If the watercourse forms the boundary with your land, you will usually own up to the centre of the channel. If in doubt, you will need to check your title deeds to confirm exact ownership. This can be done via the [land registry](#).

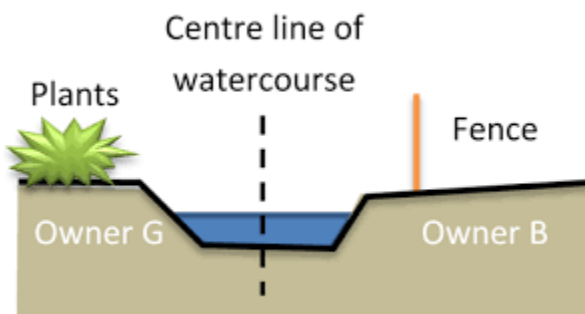
There are two types of watercourses; main rivers and ordinary watercourses. 'Main River' comes under the jurisdiction of the Environment Agency and, 'Ordinary Watercourse' under the jurisdiction of the Lead Local Flood Authority. It is worth noting that just because a watercourse has the word 'River' in its name, doesn't mean it is a 'main river', and likewise if it doesn't have the word 'river' it could still be 'main river'.

<https://thefloodhub.co.uk/wp-content/uploads/2022/12/Types-of-watercourses-main-river-vs-ordinary-watercourse.pdf>

<https://thefloodhub.co.uk/wp-content/uploads/2019/11/A-basic-guide-to-owning-and-managing-a-watercourse.pdf>

Your responsibilities and rules to follow for watercourses on or near your property, and permissions you need to do work around them can be found in the following link:

<https://www.gov.uk/guidance/owning-a-watercourse>



Developers/planning applicants must engage with the riparian owner to secure the right to discharge into a watercourse. It is in the applicant's interest to ensure that a point of outfall for the discharge of surface water to any watercourse/water body is secured as early in the process as possible. The acquisition of a right to a discharge to a watercourse/waterbody and the right to lay and maintain any associated drainage pipes should be a key consideration in the acquisition of a site/completion of an agreement to promote a site for development.

Appendix F Property Flood Resilience (PFR) Measures

Property Flood Resilience (PFR) is the term used to describe the ways in which a property can be protected from flood damage. The two main strategies used are 'resistance' and 'resilience'. Installing property flood resilience (PFR) measures can help reduce the impact and damage caused in the event of a flood. It is reported that every £1 spent on property flood resilience provides a £5 saving on future damages.

Resistance is about reducing the risk of water getting into a property. These measures can allow you time to move possessions from ground level as well as to get people to a place of safety if a flood is expected. Resistance measures often involve preventing water entering the property in the first place and they use a combination of products (flood boards and doors, air brick covers, non-return valves, pumps, toilet bungs, etc.). When considering resistance it is important to ensure the fabric of the property is sound (pointing is well maintained below ground, cable entries are sealed, etc.).

Government guidelines suggest 600mm (2ft) as a safe height to resist water entry, although many buildings in flood risk areas are protected to around 900mm (3ft). Flood protection in excess of 600mm in height should only be installed subject to a structural survey being undertaken on the property. A successful **resistance** strategy ensures that every water entry point on the property is protected. If a single point is missed or a flood defence product fails, the property will begin to take in floodwater which compromises all other protection measures and results in a failed package of works.

Resilience is about reducing the impact of flooding, should water get inside your property. The aim is to ensure that damage is minimised and you can get back in to your home or business as quickly as possible. Measures should be tailored to each property, such as using porous plaster, fitting solid floors or tiled floor coverings, raising electrics and taking simple steps in a flood event to move furniture and valuable possessions upstairs. Structural measures need to take account of the building type and its fabric. Undertaking a **resilience** approach directly after your home has flooded presents an opportunity to reinstate the property with water resilient materials and design.

Further information can found <https://nationalfloodforum.org.uk/about-flooding/reducing-your-risk/protecting-your-property/> and <https://thefloodhub.co.uk/pfr/> and a booklet is available to download at <https://thefloodhub.co.uk/wp-content/uploads/2018/09/Property-Flood-Resilience-PFR-booklet.pdf> and [https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_\(2\).pdf](https://www.bre.co.uk/filelibrary/pdf/projects/flooding/Property_owners_booklet_v2_web_(2).pdf)



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Date: October 2023
Our Ref: FSPD

Review Date: TBC
Authorised by: Julie Glaister, Planning Policy Manager

Summary of Representations Made Under Regulation 13 to the Draft Flooding, Water Management and Sustainable Drainage Systems (SuDS) SPD

The consultation on the Draft SPD resulted in responses from 15 + 1 consultees. The points raised in representation are set out below. The responses are ordered in accordance with the structure of the Draft SPD, with the chapter headings set out for reference.

Consultee	Key text from representation	Council Response
General		
Andrew Leyssens – United Utilities	<p>United Utilities welcomes the Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD.</p> <p>We encourage you to direct future developers to our free pre-application service to discuss their schemes and highlight any potential issues by contacting: Developer Services – Wastewater Tel: 03456 723 723 Email: SewerAdoptions@uuplc.co.uk Developer Services – Water Tel: 0345 072 6067 Email: DeveloperServicesWater@uuplc.co.uk</p> <p>Our Assets</p> <p>It is important to outline to the LPA the need for our assets to be fully considered in development proposals. We will not normally permit development over or in close proximity to our assets. All United Utilities assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels and proposed crossing points (access points and services). We strongly recommend that the LPA advises future applicants of the importance of fully understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so that the implications of our assets on development can be fully understood. Where our assets exist on a site, we ask site promoters to contact United Utilities to understand any implications using the above contact details.</p> <p>Our Response to the Consultation</p>	<p>UU welcome the SPD, support noted. No change requested in this part of the response.</p>

	<p>United Utilities welcomes this SPD providing detailed guidance on flooding, water management and sustainable drainage to complement policies CL1 and CL2 and other design policies within the Fylde Local Plan 2021-2032. We support the Council's SPD in outlining requirements for future development to ensure full consideration of flood risk assessments, incorporate Sustainable Drainage Systems and appropriately manage and mitigate flooding. We are grateful for the inclusion of many of the comments which we submitted in our response dated 07 Jul 2022 to your earlier consultation. We would continue to refer you to this consultation response alongside the following comments.</p>	
Angela Laycock	<p>Thankyou for letting me read the draft SUD's document. It is quite comprehensive and a necessary. You need to look at the bigger picture of where and how the water from SUD's enters the watercourse with the humongous development that has occurred</p>	<p>Comment noted. No change requested.</p>
Ben Rogers – Lead Local Flood Authority	<p>Lancashire County Council is the Lead Local Flood Authority (LLFA) for the County Council's administrative area. The Flood and Water Management Act (FWMA) sets out the requirement for the LLFA to manage 'local' flood risk (flooding from surface water, groundwater, and ordinary watercourses) within their area.</p> <p>The Lead Local Flood Authority have reviewed the Draft Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document [July 2023] and are supportive of the content and requirements set out in it. We have a few minor comments to make at this stage, detailed as set out below.</p> <ul style="list-style-type: none"> • Updated climate change allowances were published by the Environment Agency on Gov.uk on 10 May 2022 to reflect the latest projections in UKCP Local (2.2km) and subsequent research 'Future-drainage: Ensemble climate 	<p>The LLFA are supportive of the SPD.</p> <p>Further in person dialogue has taken place with the LLFA. The LLFA would prefer the SuDS Pro-forma signposting in the document. They do not want it including in the document as it changes regularly, and the latest version will be on their website.</p> <p>The climate change allowances have been added at paragraph 5.35.</p> <p>Fylde Council does not provide advice on their local requirements for determining the lifetime of non-residential developments.</p>

	<p>change rainfall estimates for sustainable drainage'. The SuDS Pro-forma has also been updated to reflect these changes. The latest version is available on the Flood Hub https://thefloodhub.co.uk/planning-development/#section-5 .</p> <p>Fylde falls within the Ribble and Wyre Management Catchments, and so for most residential development in Fylde with a lifetime of over 100 years, the allowances are now 45% (3.3% annual exceedance probability event) and 50% (1% Annual exceedance probability event). The Local Planning Authority should consider adding a paragraph to the document to set out that the new allowances must be applied in both flood risk assessments, and SuDS design.</p> <p>The Lead Local Flood Authority advise that the new allowances are applied with immediate effect to all applications validated on or after 10th May 2022. Planning applications validated before 10th May 2022 should be processed in line with the previous climate change allowances.</p> <p>The Local Planning Authority may also wish to provide advice on their local requirements for determining the lifetime of non-residential developments, as this is key in determining the correct climate change allowance.</p> <p>I hope that you find these comments valuable. Should you wish for further information or clarification on the contents of this letter please contact us at the email address provided.</p>	<p>Further text to be added to the SPD to state that residential development is assumed to have a minimum lifetime of a hundred years. For industrial/commercial the developer will be expected to provide a lifetime for the proposed development.</p>
Christine Ibbotson	<p>I can't say I have read all this nor understood the details.</p> <p>It looks like the document has been through many experts before us !</p> <p>The only comment on drainage I can think of is (and it may not be for this purpose?)</p> <p>The effect of the bypass on local fields, ponds and building - what is the mechanism for checking this is as expected and planned for?</p> <p>Have we any local issues?</p>	<p>No address was provided with this response.</p> <p>It is assumed the respondent lives near the Skipool Windy Harbour By Pass. The Planning Application for this new road which was assessed and approved by National Highways, and will have been assessed and consulted on in order to assess all impacts of the by pass.</p> <p>The Council is not aware of any local issues.</p>

Christopher Carroll – Sport England	Thank you for consulting Sport England on the above Supplementary Planning Document. Sport England have no objections to the document.	Comment noted. No change requested to the SPD.
David Diggle – Turley for Strategic Land Group	We have been instructed by the Strategic Land Group (SLG) to submit representations to the draft Flooding, Water Management and Sustainable Urban Drainage Systems Supplement Planning Document (herein called “the draft SPD”). SLG has land interests at Peel Hill Farm, Whitehills and has made representations to a number of planning applications ¹ that have been submitted by various parties on land which is allocated for housing under policy HSS5 in the adopted Fylde Local Plan (FLP).	Comment noted. No change requested to the SPD.
Diane Clarke – Network Rail	<p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).</p> <p>Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.</p>	Comments noted. No change requested to the SPD. Network Rail will be consulted on any proposed development (planning applications) in close proximity to their estate.
Emily Hrycan – Historic England	We do not have any comments to make at this stage on the consultations.	No comment made. No change requested to the SPD

Nicola Elsworth – Homes England	Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.	No comment made. No change requested to the SPD
John Rowson	<p>Thank you for the opportunity to comment. I am commenting on Flooding, Water Management etc proposals in this email.</p> <p>From my time in running SWAG and then CAPOW on behalf of residents of Wrea Green (2013-2018) and therefore raising issues arising regarding Planning, I saw a number of issues which need re-consideration now –</p> <p><i>[response on specific issues shown in relevant sections]</i></p> <p>ps Your document needs to be spell-checked as ACHIEVE is spelt "acheive" on one occasion.</p>	<p>Spelling of achieve has been corrected.</p> <p>Other comments will be addressed in the relevant sections of this table.</p>
Lancashire County Council – Heritage Environment Team	In the first instance we would of course wish to add our support to the comments made by Historic England included in the Statement of Consultation.	<p>Support noted to the comments made by Historic England.</p> <p>No change requested to the SPD.</p>
Lancashire County Council – School Planning Team	Lancashire County Council's School Planning Team welcome the opportunity to contribute to the Supplementary Planning Documents Consultation – June 2023. We recognise the value of engaging with Local Councils at the earliest stage of their plans to ensure the future needs of education are highlighted and documented within the local plan policies. The value of local knowledge can help to define and shape the future of local communities, ensuring the right level of infrastructure is achieved to meet the growth of housing and employment. The School Planning Team has worked closely with colleagues at Fylde Council over a number of years as they develop Local Plans, Strategic Policies and Supplementary Planning Documents to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision.	<p>Comments noted.</p> <p>No change requested to the SPD.</p>

Melanie Lindsley – The Coal Authority	<p>Thank you for your notification in respect of the above.</p> <p>It is noted that the Fylde Council area does not lie on the coalfield. You can check if your LPA is on the coalfield via the link below Local planning authorities on the coalfield</p> <p>On the basis that the area does not lie on the coalfield the Planning team at the Coal Authority have no comments to make on the draft SPD's.</p>	<p>Comments noted.</p> <p>No change requested to the SPD.</p>
Tim Bettany-Simmons – Canal and River Trust	<p>Thank you for your consultation on the above document.</p> <p>We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.</p> <p>Please find below the Trust's response to your draft Supplementary Planning document in relation to Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS). We hope that the comments provided are clear and helpful and that your next revision will address these points.</p>	<p>Comments noted.</p> <p>No change requested to this section.</p> <p>Other comments will be addressed in the relevant parts of the table.</p>
Glenn Robinson – Lancashire County Council	<p>Generally supportive of the document.</p> <p>There is inconsistency in the wording Sustainable Drainage Systems (SuDS). SuDS applies regardless of location urban or rural.</p>	<p>Support noted. It is understood that the widely recognised term SuDS applies to schemes in both urban and rural areas. The word urban has been deleted.</p>
Vision, Issues and Objectives		

<p>Alice Watson – Natural England</p>	<p>Natural England welcomes the identification of the importance of peat and wetlands within the SPD.</p> <p>Peat is a precious and irreplaceable resource, that once gone is lost for ever and can never be restored to sequester carbon which is bad news in a climate emergency.</p> <p>Following the publication of the England Peat Action Plan, Natural England have a better understanding of the impact of carbon loss from damaged and unmanaged peat as well as the opportunity costs of not restoring peat as functioning ecosystem. England’s peatlands are our largest terrestrial carbon store and are vital for capturing and storing carbon. They provide a range of other valuable benefits including biodiversity rich ecosystems, improved water quality and natural flood management, the protection of historic environment features and connect people with nature.</p> <p>Natural England has data on the carbon storage and sequestration of different habitats (NERR094).</p> <p>Natural England recommend policy in Local Plan Documents that clearly supports protection and enhancement of peatlands (including those in degraded state). We believe peatlands should be protected from inappropriate development and its associated operations for their carbon store and habitat value. This is in line with the England Peat Action Plan as these habitats store carbon, provide wildlife habitat and help limit the impact of flooding. We would wish to see more peatlands restored through re-wetting. We do not support the extraction of peat or its importation.</p> <p>Therefore we advise the wording and guidance in this SPD could be strengthened to ensure the protection of peat from water management and drainage from new developments. Natural England welcome that areas of peat should be identified and mapped, however the SPD does not include guidance on what should be considered, and how drainage and water management should be designed if an area of peat is identified. We advise the SPD should include information that where areas of peat are identified, any drainage design and</p>	<p>Additional text has been added to the Vision and Objectives.</p> <p>The Biodiversity SPD already provides guidance on appropriate tree species close to the protected areas along the coast and says that Poplar and Pine for example should not be planted as they could self -seed and be invasive on the dunes.</p>
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	<p>water management may require a tailored approach. Any peat deposits would require a buffer to ensure the hydrology of the soil is maintained any design should avoid areas of peat being developed or being sealed in.</p> <p>We note the SPD includes the objective to increase existing tree cover. Whilst we welcome this inclusion, and other biodiversity related objectives of the SPD, we advise any additional tree planting should consider the existing biodiversity of the area, and there should be significant consideration to ensure there will be no conflicts between the existing habitat and the species it supports and that to be planted; for example the planting of new trees within existing coastal habitat or within suitable habitat that supports the qualifying species of the Ribble & Alt Estuaries Special Protection Area (SPA)/Ramsar or Martin Mere SPA/Ramsar.</p>	
David Diggle – Turley for Strategic Land Group	<p>SLG agrees with the proposed vision which seeks to sustainably manage water management and to deliver flood resilience to the borough now and in the future. SLG also agrees with the statement made at paragraph 1.1 that in light of the borough's coastal, low lying geographical location, flood risk and water management are "key issues that need to be addressed in Fylde for both existing and future developments." <i>[Footnote refers to Planning Application References 17/0779 (Applicant: Wainhomes); 19/0284 (Applicant: BAK); 21/0472 (Applicant: Mr J Ball) and 22/04661 (Applicant: Wainhomes)]</i></p>	<p>Support for vision noted. No change requested.</p>
Legislative and Policy Review		
Andrew Leyssens – United Utilities	<p>Planning Practice Guidance</p> <p>Whilst noting that there is a requirement within the PPG for water and wastewater infrastructure companies to fully account for proposed growth and other relevant issues, it is important to highlight that many sites come forward outside of the development plan process as windfalls which are difficult to plan for. In addition, the full details of a development are not always known at the</p>	<p>Comments noted in relation to the PPG, it is difficult to predict where development will take place and what the exact end use will be.</p> <p>The three Fylde Coast Authorities have commissioned a Joint SFRA Level 1. UU will</p>

	<p>allocation / application stage. For example, the approach to surface water drainage, the point of connection or the nature of an employment occupier, which can result in differing demands on wastewater and water supply requirements.</p> <p>Strategic Flood Risk Assessment (SFRA) (2011)</p> <p>We wish to note that the SFRA (2011) is now out of date and that it is necessary to update this to take account of any new known flood risks. In particular, we have improved data on the risks of flooding from the public sewer and we would wish to assess any potential future allocations against the information which we hold on modelled sewer flood risk and sewer flooding incident data.</p>	<p>be included as a member of the stakeholder group for this document. UU will be consulted early on any potential new allocations for a new Local Plan, when this work takes place.</p> <p>No change requested.</p>
Angela Laycock	<p>On note 4.32 I would suggest that monies are also needed for the development of upstream water courses.</p>	<p>Comment noted.</p> <p>This does not relate to 4.32 which concerns the redevelopment of coastal defences.</p>
Ben Rogers – Lead Local Flood Authority	<p>Regarding paragraph 4.45, and other paragraphs that refer to "pre-application advice" - the Lead Local Flood Authority ask for our service to be referred to as our 'surface water planning advice service'. This is to reflect recent changes that enable this service to be accessed throughout the planning application process, for example, for advice on detailed SuDS design at the discharge of conditions stage.</p>	<p>The reference to the LLFA pre-application advice will be changed to 'Surface Water Planning Advice Service'.</p>
Christopher Carroll – Sport England	<p>Sport England ... welcome paragraph 4.21 which makes reference to the current local plan policy, Strategic Policy ENV3 Protecting Existing Open Space (part of the Green Infrastructure Network) with specific reference to 'sports and playing pitches.' However, Sport England would prefer if '<u>playing pitches</u>' were replaced with '<u>playing field</u>' in accordance with paragraphs 99 and 102 of the NPPF.</p> <p>The 2015 Order defines a playing pitch as 'a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for</p>	<p>Playing pitches will be changed to playing field.</p> <p>This was included at 6.13 but has been expanded upon.</p>

	<p>association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.'</p> <p>As stated previously (please see below), it would also be welcomed if the SPD could expand on this local planning policy objective, as well as specifically explain the importance of existing and proposed playing fields and areas used for outdoor sport to remain useable throughout the year and that it is not appropriate for these areas to remain waterlogged as this can affect the use of the space and the health and wellbeing of residents. These areas should therefore be positively drained and included in the 'drained area' as part of any development proposal.</p>	
Flood Risk and Location of Development		
<p>Andrew Leysens – United Utilities</p>	<p>We welcome the reference to all sources of flood risk in this section including reservoir flood risk and the risk of flooding from overwhelmed drainage systems.</p> <p>Reservoir Flood Risk: Within this section we recommend that you refer to new guidance in the PPG regarding the risk of flooding from reservoirs. We recommend you include the following wording:</p> <p style="padding-left: 40px;">'There are a number of reservoirs within Lancashire, each with its own reservoir flooding zone, showing how far flood water would spread from the reservoir in the unlikely event that a reservoir failed. These maps are available on the Environment Agency website at https://flood-warning-information.service.gov.uk/long-term-flood-risk/map .</p> <p>When looking at possible future development within a reservoir flood zone, applicants must refer to the advice within the National Planning Practice Guidance on Flood Risk and Coastal Change. This states that the local planning authority will need to evaluate the potential damage to</p>	<p>Further text added at 5.10. There are two very small, self-contained, circular, covered reservoirs in Fylde. They are in countryside areas so it is unlikely there will be development close to them. Some of this advice is for Fylde Council not for applicants therefore it hasn't been included. A sentence has been included for applicants advising them to discuss any proposal in the reservoir flood zones with the reservoir operators.</p> <p>An additional bullet has been added to 5.11 to cover hydraulic locking of outfalls from public sewars on development sites.</p>

	<p>buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir.</p> <p>Local planning authorities will also need to evaluate in Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding.</p> <p>If development is proposed within a reservoir flood zone, local planning authorities and applicants should discuss the development proposed with the reservoir undertakers (such as United Utilities) at the earliest opportunity, in order to:</p> <ul style="list-style-type: none"> - avoid intensification of development within areas at risk from reservoir failure; and - ensure that reservoir undertakers can assess the cost implications of any reservoir safety improvements required due to changes in land use downstream of their assets. <p>Developers should be expected to cover any additional costs incurred, as required by the National Planning Policy Framework's 'agent of change' policy (paragraph 187). This could be through Community Infrastructure Levy or section 106 obligations for example.'</p> <p>Tidal Impact on Existing Drainage Systems:</p> <p>We also request that you include wording in this section which identifies the potential tidal impact on existing drainage systems. We have recommended wording below.</p> <p>'Applicants will need to engage with flood risk management agencies to understand whether a site is affected by a combination of flood risks. In particular, a high tide can result in the hydraulic locking of outfalls from existing drainage systems such as the public sewer. This can increase the</p>	<p>Additional text added to Pre-purchase and Pre-application advice and Managing and Mitigating Flood Risk.</p> <p>Advice on not paving gardens has been added to the householder section however this was already covered at 7.36-7.41 so a cross reference has been included.</p>
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	<p>risk of flooding from the public sewer on a site. Such matters will need careful consideration by applicants when promoting development proposals through consultation with the relevant flood risk management agencies.'</p> <p>Pre-Purchase and Pre-Application Advice</p> <p>Within paragraph 5.37 we request that you refer to the need for applicants / site promoters to consult with the water and wastewater company to obtain advice on flood risk, foul drainage and any groundwater protection matters. They will also need to consult United Utilities on surface water drainage alongside consultation with the LLFA. Site promoters can use the contact details outlined above.</p> <p>We request that your document notes that drainage design is intrinsically linked to wider site design. Mitigating measures may be necessary to ensure that a development is resilient to the risk of flooding from the public sewer.</p> <p>Householder Development</p> <p>With respect to this section we request that you include an additional paragraph regarding paving over gardens. We request that you include the following wording.</p> <p style="padding-left: 40px;">'The paving over of gardens has a significant impact on public sewers. The paving over of gardens can increase the flow of rainwater to the public sewer rather than allowing it to naturally infiltrate to ground. This increases the flow of water to the public sewer, which increases the likelihood of flooding and the likelihood that a public sewer will spill into a waterbody. The combined effect of many properties paving over gardens places a huge strain on our sewers during storm events.</p> <p style="padding-left: 40px;">In the first instance, we encourage you to not pave over your garden areas. However, if you do, we request that you do all you can to ensure that surface water can continue to drain via a permeable surface and / or is directed to a permeable surface such as flower beds. In some</p>	
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	<p>instances, you may require planning permission. Further advice can be found here.</p> <p>In constructing any new householder project, we would encourage you to incorporate rain gardens. Guidance on rain gardens can be found here and here.'</p>	
David Diggle – Turley for Strategic Land Group	<p>The draft SPD acknowledges that any SPD should provide detail and guidance to support policies and proposals as set out in any Development Plan – in this case the Flyde <i>[sic.]</i> Local Plan to 2032 (incorporating a partial review) (FLP) which was adopted by the Council on 6th December 2021. The need to deal with flood risk is not only one of the FLP's main objectives; it is also extensively referenced in a number of important policies including CL11. The SPD also cross-references the national planning policy position to flood risk and location of development as set out in the National Planning Policy Framework. <i>[Footnote refers to Framework paras. 159-169]</i></p> <p>Chapter five of the draft SPD sets out the approach to flood risk and location of development in more detail. Quite rightly, it reaffirms the national and local planning policy imperative to steer new development to areas which are in less risk to flooding are developed in preference to areas of higher risk and in particular, the timing, extent and process of undertaking of the sequential test.</p> <p>In paragraph 5.8, the SPD asserts that "the sequential test has been carried out for the allocations in the Fylde Local Plan (incorporating Partial Review)." This statement is not correct. As our submissions to various planning applications (see Enclosures A, B, C and D) confirm, land allocated for housing under FLP policy HSS5 has not undergone a sequential assessment and testing during the Development Plan process. In summary:</p> <ul style="list-style-type: none"> • The FLP was submitted in December 2016 with two rounds of hearing sessions held between March and December 2017. The first planning application on HSS5 land was submitted in between these two rounds of hearing sessions (September 2017). The Strategic Flood Risk Assessment supporting the FLP identifies the land 	Paragraphs 5.8 and 5.9 have been amended to clarify the circumstances when a sequential test will be required.

	<p>allocation as falling within Flood Zone 1. Main Modifications to the FLP underwent consultation in March 2018. The EA responded to these and did not raise any flood risk issue for the allocation HSS5. There was some further, focussed, activity and written correspondence between the Council and the Inspector relating to the Habitat Regulations in June and July 2018. The Inspectors Report was issued on 18th September 2018.</p> <ul style="list-style-type: none"> • The Environment Agency (EA) confirmed a change of flood classification for housing allocation HSS5 (from Flood Zone 1 to 3) in its objection letter to the planning application on 2 August 2018. • The EA's concerns were then brought to the attention of the Local Plan Inspector by a third party who in turn asked for a response from the LPA. The LPA responded that, in order not to delay the adoption of the FLP, any site-specific flood issues are to be dealt through the determination of the planning application rather the Development Plan process. The FLP Examination was subsequently closed with no sequential test being undertaken for housing allocation HSS5. • The partial review of the FLP was conducted between October 2020 and October 2021. The partial review did not deal with flood risk issues associated with land allocation HSS5. <p>The information that SLG has obtained confirms that the sequential test implications of the change in flood designation on housing allocation HSS5 were not considered prior to the adoption of the FLP (previous or through partial review), either as a standalone re-assessment or through an update to the Strategic Flood Risk.</p> <p>Sequential Test Methodology</p> <p>The draft SPD sets out a broad approach as to a methodology for undertaking a sequential test, referring to national practice guidance and good practice. It provides guidance⁴ in respect of any anticipated area of search and states that:</p>	
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	<p>"In most cases a search of lower flood risk will incorporate the whole Borough with any variation to be justified in the sequential report and agreed by the Council at pre-application stage.</p> <p>A reduced area of search may be acceptable depending on the local circumstances and whether it can be demonstrated that there is a local need e.g. affordable housing in that area. The area of search can be influenced by particular policy objectives, the scale of the development, or the purpose of the development itself (a particular area it intends to serve for example."</p> <p>The subsequent table5 is suggested as a starting point for any area of search. For residential schemes, the table asserts that the area of search should be Borough wide, highlighting that all residential development contributes towards housing need in the Borough.</p> <p>While this may be true, it is important that any area of search needs to be guided by the prevailing strategic policies of the FLP. For good reasons, these strategic policies steer development into certain areas of the Borough and set out the extent and spatial distribution of housing. These important factors cannot be ignored when considering a sequential test on a proposal which is seeking to achieve the strategic policy objectives of the FLP.</p> <p><i>[The representation attaches four letters which are copies of representations made to planning applications, relating to application of the sequential test]</i></p>	
<p>Lancashire County Council – School Planning Team</p>	<p>The School Planning Team also request that as part of the Supplementary Planning Document Consultation Fylde Council take into consideration the new LCC School Site Criteria as part of infrastructure delivery especially in relation to Biodiversity Net Gain which is a new statutory requirement from November 2023. Additionally, the site must not be within flood zone 2 or 3 or subject to ground water flooding.</p>	<p>Comments noted.</p> <p>The Council is aware of the Biodiversity Net Gain requirements, which do not relate to flooding.</p> <p>LCC school planning team would be consulted on any planning application for a</p>

		school, therefore, no change is needed to the SPD.
Tim Bettany-Simmons – Canal and River Trust	<p>The Canal & River Trust own and manage the Lancaster Canal, which is a rural section and as such development next to the canal would like to be more limited.</p> <p>Section 5 relating to flood risk does make reference to canals when quoting National Guidance. Given the rural setting of the canal within the authority area the flood risk from the canal would be low.</p>	Comments noted, no change to the SPD requested.
Managing and Mitigating Flood Risk		
Alice Watson – Natural England	We further note Section 6.33 states that opportunities to retrofit Green Infrastructure (GI) will be looked on favourably. We advise you may wish to strengthen this section to include examples on how they can retrofit GI including adding green roof systems, roof gardens and green walls to existing buildings and new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).	Text on retrofitting GI will be added to 6.33.
Andrew Leysens – United Utilities	<p>Finished Floor and Ground Levels</p> <p>We welcome the wording in this section. We suggest that this is expanded to include reference to changes of levels on top of a public sewer.</p> <p>‘An applicant should not assume that changes in levels or any proposed diversion of the public sewer system will be acceptable as such proposals could increase or displace flood risk. In such circumstances, any alteration of the public sewer would be refused by the wastewater undertaker. This could be material to the detail of your site design and layout.’</p>	These two sections of text will be added to the SPD.

	<p>This is also relevant to paragraph 6.21.</p> <p>Site Layout</p> <p>We note that paragraph 6.13 refers to the drainage of playing fields. We request that you include the following wording in this paragraph.</p> <p style="padding-left: 40px;">'Applicants should note that the connection of any land drainage to the public sewer will not be permitted and therefore alternative drainage arrangements to manage land drainage will need to be secured.'</p>	
Angela Laycock	<p>On note 4.32 I would suggest that monies are also needed for the development of upstream water courses.</p>	<p>Considered here as could relate to 6.32 rather than 4.32. The Council agrees with this comment although it is assumed that 'development' means natural flood management. Upstream areas of the Ribble for example will be managed by the relevant authorities in those areas. No change needed to the SPD.</p>
Ben Rogers – Lead Local Flood Authority	<p>Paragraph 6.24 (and subsequent sections on culverting in section 6) could refer to the LLFA's Ordinary Watercourse Consent Service. Any works to a culvert require consent from the LLFA under the land drainage act 1991. In a similar manner to how the SPD refers and links to the LLFA's planning advice service in section 5.40, so too could this section link to the LLFA's Ordinary Watercourse Service, which can be found here:</p> <p>https://www.lancashire.gov.uk/flooding/drains-and-sewers/alterations-to-a-watercourse/</p>	<p>More text and the link have been added to 6.26. The word 'daylighting' has been added.</p>

	<p>It may also be worth mentioning that we would like to see developments "daylighting" existing culverts by replacing them with open ditches/SuDS.</p>	
<p>Diane Clarke – Network Rail</p>	<p>We ask that all surface and foul water drainage from development areas are directed away from Network Rail's retained land and structures into suitable drainage systems, the details of which are to be approved by Network Rail before construction starts on site.</p> <p>Water must not be caused to pond on or near railway land either during or after any construction-related activity and as a permanent arrangement.</p> <p>The construction of soakaways for storm or surface water drainage should not take place within 30m of the Network Rail boundary. Any new drains are to be constructed and maintained so as not to have any adverse effect upon the stability of any Network Rail equipment, structure, cutting or embankment.</p> <p>The construction of soakaways within any Network Rail lease area is not permitted.</p> <p>The construction of surface water retention ponds/tanks, SuDS or flow control systems should not take place within 30m of the Network Rail boundary where these systems are proposed to be below existing track level. Full overland flow conditions should be submitted to Network Rail for approval prior to any works on site commencing.</p> <p>If a Network Rail-owned underline structure (such as a culvert, pipe or drain) is intended to act as a means of conveying surface water within or away from the development, then all parties must work together to ensure that the structure is fit for purpose and able to take the proposed flows without risk to the safety of the railway or the surrounding land. Usage of any Network Rail culverts are to be agreed with Network Rail. It must not be assumed that Network Rail will grant any access to its drainage to outside parties.</p> <p>Wayleaves and or easements for underline drainage assets</p>	<p>Comments noted.</p> <p>Network Rail will be consulted on any proposed development (planning applications) in proximity to their estate.</p>

	<p>The position of any underline drainage asset shall not be within 5m of drainage assets, sensitive operational equipment such as switches and crossings, track joints, welds, overhead line stanchions and line side equipment, and not within 15m of bridges, culverts, retaining walls and other structures supporting railway live loading.</p> <p>Protection of existing railway drainage assets within a clearance area</p> <p>There are likely to be existing railway drainage assets in the vicinity of proposed works. Please proceed with caution. No connection of drainage shall be made to these assets without Network Rail's prior consent to detailed proposals. Any works within 5m of the assets will require prior consent. There must be no interfering with existing drainage assets/systems without Network Rail's written permission. The developer is asked to ascertain with Network Rail the existence of any existing railway drainage assets or systems in the vicinity of the development area before work starts on site. Please contact Network Rail Asset Protection for further information and assistance.</p> <p>Before the submission of a planning application outside parties are to submit details to AssetProtectionLNWNorth@networkrail.co.uk – it is advised that agreement to development drainage to agreed prior to submission of plans to determine any impacts of the proposal and to ensure that the developer includes and funds any mitigation measures as required by Network Rail. The applicant is liable for all costs incurred by Network Rail in facilitating the proposal.</p>	
Robert Ankers – Betts Associates for Emery Planning	<p>Fylde Council is consulting on a new Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document (SPD). This note reviews the preliminary planning document in relation culverting watercourses.</p> <p>Sustainable Drainage Systems (SuDS)</p>	<p>'Should be resisted' allows for short sections to be culverted for highways/access to developments.</p> <p>No change needed to the SPD.</p>

	<p>The SPD states the culverting of watercourse should be resisted. Whilst this is generally good practice there are instances where culverting of watercourses are required. Many developments have either site access or highway connectivity through schemes which necessitate the localised culverting of existing watercourses. These crossing will be short localised culverts for the road width only, culverted sections will not be provided other than for road crossings.</p>	
<p>Tim Bettany-Simmons – Canal and River Trust</p>	<p>Section 6 details managing and mitigation flood risk and we note paragraph 6.15 which states, "Land alongside a watercourse is particularly valuable in relation to improving the biodiversity offer and maximising ecological value. Retaining and enhancing ecological networks adjacent to watercourses will help to ensure that the biological and chemical quality of a watercourse is not reduced as a result of development, which is a key requirement of the Water Framework Directive. Based on this, it is recommended that an unobstructed buffer area is incorporated into the layout of the proposed development between watercourses and the built development. This buffer should be free from built development, lighting and formal landscaping."</p> <p>The Trust would support this principle and agree that a buffer zone should be incorporated into any proposed development adjacent to the canal. Any such buffer zone would need to be subject to ongoing management and maintenance responsibility.</p>	<p>Add the words 'Any such buffer zone would need to be subject to ongoing management and maintenance responsibility by the landowner or responsible authority'.</p>
<p>Glenn Robinson – Lancashire County Council</p>	<p>At this time LCC Highways do not accept third party discharge into any highway drains except in exceptional circumstances. LCC Highways are currently drafting a policy document which will outline what the exceptional circumstances will be and all local authorities will be provided with copies when it is available.</p>	<p>Text added to paragraph 5.37.</p>

Sustainable Urban Drainage Systems (SuDS)		
<p>Andrew Leysens – United Utilities</p>	<p>We welcome the reference to the drainage hierarchy in paragraph 7.3. However, in accordance with our previous submission, we request that the hierarchy is amended to reference a pumped discharge of surface water to a watercourse <i>[sic.]</i> is sequentially preferable to discharge to a sewer especially a combined sewer. Alongside this we request that the SPD includes the following explanatory wording.</p> <p style="padding-left: 40px;">‘A pumped discharge of surface water to a watercourse is sequentially preferable to any discharge to a sewer. Discharge to a sewer is more unsustainable for a number of reasons. These include: - an increased risk of impact on the environment in terms of increased risk of spills to watercourses from public sewers; - additional energy required to treat surface water at existing wastewater treatment works; and additional energy required to pump via existing pumping stations on the public sewer network.’</p> <p>We also request that you include the following wording.</p> <p style="padding-left: 40px;">‘For any development proposal which is part of a wider development / allocation, foul and surface water strategies must be part of a holistic site-wide strategy. Pumped drainage systems must be minimised where possible and a proliferation of pumping stations on a phased development will not be acceptable.’</p> <p>Design Principles and SuDS techniques</p> <p>Whilst welcoming a design principle which maximises multi-functionality, we request that your explanatory text states that clear evidence will be required where multi-functional SuDS are not included and that even in urban environments, applicants will be required to innovatively consider how landscaping can be integrated with opportunities for surface water management. We request that you include the following wording.</p>	<p>Additional text has been added to the relevant sections of the SPD.</p>

	<p>'Applications for major development will be required to incorporate sustainable drainage which is multi-functional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence submitted to the local planning authority which demonstrates why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain. Even in urban environments where space is limited applicants will be expected to demonstrate how surface water management has been integrated with the landscaping for a site such as rain gardens, tree pits and green roofs.'</p> <p>Rainwater Harvesting</p> <p>Whilst being supportive of the principle of rainwater harvesting, we request that you include the following wording.</p> <p>'The incorporation of any rainwater harvesting must be carefully considered and meet all regulatory requirements. It is critical that expert advice and any relevant approvals are obtained to prevent any cross contamination of rainwater into the mains water pipework system.'</p>	
Angela Laycock	<p>Note 7.54 If Main Drain was at a lower level like it was before the Environment Agency took it over so that you could see land drains then the main river would have more capacity to store excess water though I do agree with climate change we may need some more mitigation but as long as it does not affect upstream.</p> <p>Note 7.87 to 7.96 . I hope Fylde Borough Council is going to enforce this.</p>	<p>Comments noted.</p> <p>No change requested to the document.</p>

Ben Rogers – Lead Local Flood Authority	<ul style="list-style-type: none"> Section 7 should refer to the fact that the LLFA objects to any proposals to pump surface water where clear and robust evidence is not provided to demonstrate why a gravitational connection cannot be provided, which is accordance with standard S12 of Defra's technical standards for SuDS. It may be appropriate to include this around the paragraphs on hierarchy of drainage options (7.3). Given the maintenance and sustainability issues it poses, we generally consider pumping to be at the bottom of the hierarchy of drainage options – i.e. a pumped connection to an ordinary watercourse is not necessarily preferable to a connection to a surface water sewer. 	Paragraph 7.5 has been amended to include the text about the LLFA objecting to proposals to pump surface water.
Diane Clarke – Network Rail	<p>We ask that all surface and foul water drainage from development areas are directed away from Network Rail's retained land and structures into suitable drainage systems, the details of which are to be approved by Network Rail before construction starts on site.</p> <p>Water must not be caused to pond on or near railway land either during or after any construction-related activity and as a permanent arrangement.</p> <p>The construction of soakaways for storm or surface water drainage should not take place within 30m of the Network Rail boundary. Any new drains are to be constructed and maintained so as not to have any adverse effect upon the stability of any Network Rail equipment, structure, cutting or embankment.</p> <p>The construction of soakaways within any Network Rail lease area is not permitted.</p> <p>The construction of surface water retention ponds/tanks, SuDS or flow control systems should not take place within 30m of the Network Rail boundary where these systems are proposed to be below existing track level. Full overland flow conditions should be submitted to Network Rail for approval prior to any works on site commencing.</p>	<p>Comments noted.</p> <p>Network Rail will be consulted on any proposed development (planning applications) in proximity to their estate.</p>

	<p>If a Network Rail-owned underline structure (such as a culvert, pipe or drain) is intended to act as a means of conveying surface water within or away from the development, then all parties must work together to ensure that the structure is fit for purpose and able to take the proposed flows without risk to the safety of the railway or the surrounding land. Usage of any Network Rail culverts are to be agreed with Network Rail. It must not be assumed that Network Rail will grant any access to its drainage to outside parties.</p> <p>Wayleaves and or easements for underline drainage assets</p> <p>The position of any underline drainage asset shall not be within 5m of drainage assets, sensitive operational equipment such as switches and crossings, track joints, welds, overhead line stanchions and line side equipment, and not within 15m of bridges, culverts, retaining walls and other structures supporting railway live loading.</p> <p>Protection of existing railway drainage assets within a clearance area</p> <p>There are likely to be existing railway drainage assets in the vicinity of proposed works. Please proceed with caution. No connection of drainage shall be made to these assets without Network Rail's prior consent to detailed proposals. Any works within 5m of the assets will require prior consent. There must be no interfering with existing drainage assets/systems without Network Rail's written permission. The developer is asked to ascertain with Network Rail the existence of any existing railway drainage assets or systems in the vicinity of the development area before work starts on site. Please contact Network Rail Asset Protection for further information and assistance.</p> <p>Before the submission of a planning application outside parties are to submit details to AssetProtectionLNWNorth@networkrail.co.uk – it is advised that agreement to development drainage to agreed prior to</p>	
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	<p>submission of plans to determine any impacts of the proposal and to ensure that the developer includes and funds any mitigation measures as required by Network Rail. The applicant is liable for all costs incurred by Network Rail in facilitating the proposal.</p>	
<p>Robert Ankers – Betts Associates for Emery Planning</p>	<p>Fylde Council is consulting on a new Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document (SPD). This note reviews the preliminary planning document in relation to culverting watercourses.</p> <p>Sustainable Drainage Systems (SuDS)</p> <p>The SPD states the culverting of watercourse should be resisted. Whilst this is generally good practice there are instances where culverting of watercourses are required. Many developments have either site access or highway connectivity through schemes which necessitate the localised culverting of existing watercourses. These crossings will be short localised culverts for the road width only, culverted sections will not be provided other than for road crossings.</p>	<p>'Should be resisted' allows for short sections to be culverted for highways/access to developments.</p> <p>No change needed to the SPD.</p>
<p>John Rowson</p>	<p>- Installed SUDs need to be checked to ensure these can cope with the volumes of surface water required during the Planning Stage. From my past work, I could find NO statutory body which actually undertakes this for a development after implementation. It seems to be a "suck it and see" approach.</p>	<p>For proposed major schemes the capacity of proposed SUDs is checked by the LLFA and EA. If the capacity was found to be lacking the applicant would be advised to revise the application before it could be recommended for approval.</p>
<p>Lancashire County Council, Heritage Environment Team</p>	<p>As for the footnote (3) included in the Draft Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD as a response to the comments made by Historic England, it would appear to be incorrectly referenced in the Statement of Consultation as being Footnote (4), whilst the link to Historic</p>	<p>The footnote has been included as text with a working link.</p>

	<p>England's Guidance Preserving Archaeological Remains was broken when I tried it.</p> <p>Although the footnote does refer to the HET as the place to go to for advice, we would suggest that, given its length, it's inclusion as a separate paragraph would help make the need to consult more readily apparent.</p>	
Water Quality and Pollution Control		
<p>Andrew Leysens – United Utilities</p>	<p>At the current time the wording of this section is specific to a watercourse. We request that you refer to the water environment absolute including bathing waters and the groundwater environment. With respect to groundwater, we request that you include the following wording.</p> <p style="padding-left: 40px;">‘Groundwater Source Protection Zones</p> <p style="padding-left: 40px;">Development proposals must accord with the latest national guidance on Groundwater Protection. Where necessary, applicants will be required to undertake a risk assessment (quantitative and qualitative) of the impact on the groundwater environment and public water supply. Development will only be acceptable where it is demonstrated to the Local Planning Authority that there will be no unacceptable impact on the groundwater environment and public water supply.</p> <p style="padding-left: 40px;">Where required in consultation with the Environment Agency and/or the water and sewage company, new development proposals will be expected to be supported by a risk assessment, careful masterplanning, and the incorporation of mitigation including measures to manage the impact of the construction process. Guidance on development in groundwater source protection zones is provided on gov.uk and within the ‘Environment Agency’s Approach to Groundwater Protection’.</p> <p style="padding-left: 40px;">A quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the</p>	<p>Additional text added to 8.1.</p> <p>The Council is not aware of any Groundwater Source Protection Zones in Fylde and has therefore asked United Utilities to clarify where they are and provide a map.</p> <p>No response has been received from United Utilities.</p>

	<p>risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. Subject to the outcome of the risk assessment, the mitigation measures may include the highest specification design for the new foul and surface water sewer systems (pipework, trenches, manholes, pumping stations and attenuation features).'</p>	
<p>John Rowson</p>	<p>Where there are old joint surface water and sewer pipes, there is a need to ensure the additional sewage can be handled safely, without causing sewage flooding or overflow.</p> <p>Where there is a pumping station (as in Wrea Green) and excess joint water (sewage and surface water) during storms (or even due to a blockage), which is above handling capacity of the pumping station, the excess is allowed to flow into Wrea Brook, there needs to be a meter on that outflow pipe to gauge the volume and period for such sewage mix overflow into Wrea Brook and beyond, down to the sea. When asked about this United Utilities said there wasn't one and reliance was placed on the Environment Agency to test the water in Wrea Brook periodically. However, by then the damage is done and further lighter rain will dilute any prior concentration. A meter would provide data on anything else which might need to be done. I am sure this is just an example of this issue.</p> <p>United Utilities should take a proper stand on matters. I was advised during a meeting with their representative between 2014 and 2018, that they do not object to developments because of joint water and sewage handling, for fear of being sued by developers. This needs to stop!</p>	<p>Comments noted.</p> <p>A limited number of spills are permitted each year. None of the points raised are within the Council's jurisdiction.</p> <p>No change requested to the SPD.</p>

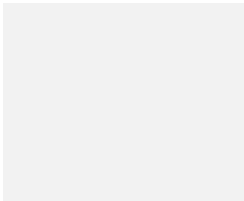
	There needs to be a regular checking of mains pipes to ensure that these are not obstructed by debris or tree roots, hence causing flooding. There should be a timetable for this, with regular reporting to the Public on the achievement of this timetable, the results and the action proposed.	
Tim Bettany-Simmons – Canal and River Trust	Section 8 relates to water quality and pollution control; we would advise that the biggest potential impact on the Lancaster Canal tends to be pollution from Agricultural uses. For any new developments or changes to land use involving farms near our canal, then we would want to work closely with the Council in order establish robust conditions that will protect the canal from agricultural run-off and cattle poaching, but also to look at opportunities to seek changes to farming practices which are not ideal for the long-term health of the canal ecosystem. For example, like ensuring better storage of materials/nutrients, upgraded water troughs to avoid cattle in the canal. This will help to prevent eutrophication of the waterbody, spikes in pollution incidents that cause fish kills, and help us to achieve better status on the Water Framework Directive. The installation of stock proof fencing and coir rolls/marginal planting along the offside bank would help improve the bank integrity, capture run-off pollutants and improve habitat for water voles.	Some text to be included that says the Council will work with the Canal and River Trust to protect the water quality of the Lancaster Canal. The Council notes the comments made however it cannot require some of the measures mentioned via the planning system.
Appendices		
Andrew Leysens – United Utilities	Appendix E Riparian Owner Consistent with the wider document, we request that this section restates the need for applicants to engage with the riparian owner to secure the right to discharge. It should explain that: ‘It is in the applicant’s interest to ensure that a point of outfall for the discharge of surface water to any watercourse / waterbody is secured as soon as possible.	An additional paragraph has been added to Appendix E.

	<p>The acquisition of a right to discharge to a watercourse / waterbody and the right to lay and maintain any associated drainage pipes should be a key consideration in the acquisition of a site / completion of an agreement to promote a site for development.'</p>	
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**Fylde Council: Flooding, Water
Management and Sustainable Urban
Drainage Systems (SuDS)
Supplementary Planning Document
SEA Screening Report**

MAY 2023

Contacts



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Fylde Council: Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document

SEA Screening Report

Author	Revati Khambete
Checker	Catherine Wright
Reviewer	Sarah Tooby
Approver	Frank Hayes
Date	MAY 2023

Version Control

Version	Date	Author	Checker	Reviewer	Approver	Changes
V1	March 2023	RK	CW	ST	FH	First Draft for Client Review
V2	April 2023	CW	ST	ST	FH	Update following client comments
V3	April 2023	CW	ST	ST	ST	Minor update for consultation
V4	May 2023	CW	ST	ST	ST	Finalisation following consultation

This report dated 11 May 2023 has been prepared for Fylde Borough Council (the “Client”) in accordance with the terms and conditions of appointment dated 21 February 2023 (the “Appointment”) between the Client and Arcadis UK) Limited (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

Introduction

Fylde Local Plan (incorporating Partial Review)

The Fylde Local Plan to 2032 (incorporating Partial Review) comprises the Fylde Local Plan to 2032 (adopted October 2018) and the revisions to it made through the Partial Review (December 2021). The Partial Review replaces nine policies and elements of the supporting text of the Fylde Local Plan to 2032 (adopted October 2018). Further details can be found on the Council website¹. The Fylde Local Plan to 2032 (incorporating Partial Review) provides the statutory planning framework (the 'Development Plan') for the Borough for non-minerals and waste matters for the period 2011-2032.

Supplementary Planning Documents

Supplementary Planning Documents (SPDs) provide further detail and guidance in relation to policies and proposals within the Development Plan, in this case the Fylde Local Plan to 2032 (incorporating Partial Review), which was adopted by the Council on 6th December 2021.

Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD

The Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD has been informed by the earlier consultation on the SPD Scoping Report², undertaken between 9th June and 7th July 2022. The SPD Scoping Report describes the proposed scope and content of the SPD and includes questions about the proposed content and options for dealing with particular issues.

The Council is required to prepare a summary (under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012) of the main issues raised and how those issues have been addressed in the SPD. The Statement of Consultation that accompanies this SPD provides a summary of the representations received and for each representation provides a comment from the Council explaining how the issue has been addressed in the SPD. The Draft SPD will be subject to a further full consultation prior to adoption. Issues raised will be reviewed by the Council and considered for inclusion. Whether or not additional issues are included will reflect consideration of the evidence in relation to those issues and whether they can be addressed by the Flooding, Water Management and SuDS SPD.

There are nine Local Plan policies referenced in the SPD:

- Strategic Policy M1 Masterplanning the Strategic Locations for Development
- Strategic Policy GD7 Achieving Good Design in Development
- Strategic Policy HW1 Health and Wellbeing
- Strategic Policy INF1 Service Accessibility and Infrastructure
- Non-strategic Policy INF2 Developer Contributions
- Strategic Policy CL1 Flood Alleviation, Water Quality and Water Efficiency
- Strategic Policy CL2 Surface Water Run-Off and Sustainable Drainage
- Strategic Policy ENV1 Landscape
- Strategic Policy ENV3 Protecting Existing Open Space

The aims of these policies are to set out how flood risk can be reduced and mitigated when planning for new developments, and also, how water can be most effectively used within existing and future development sites.

¹ Available at: [Adopted Fylde Local Plan to 2032 \(incorporating Partial Review\) – Fylde Council](#) [Accessed 28/02/23]

² Available at: [Provision-of-Parking-on-New-Developments-SPD-Scoping.pdf \(fylde.gov.uk\)](#) [Accessed: 01/03/23]

The SPD sets out a Vision for flooding, water and SuDS in Fylde, sets out water and flooding standards that different types of development would need to adhere to, and mitigation measures to avoid adverse effects on the water environment.

SEA Screening

Certain types of planning documents are required to be subject to Strategic Environmental Assessment (SEA). SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004³ (the SEA Regulations). SEA is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.

The Flooding, Water Management and SuDS SPD has been screened to determine if application of the SEA Regulations is required. The purpose of this report is to document the SEA Screening decision. This SEA Screening Report has been consulted on for three weeks with the Environment Agency, Natural England and Historic England.

Screening Method

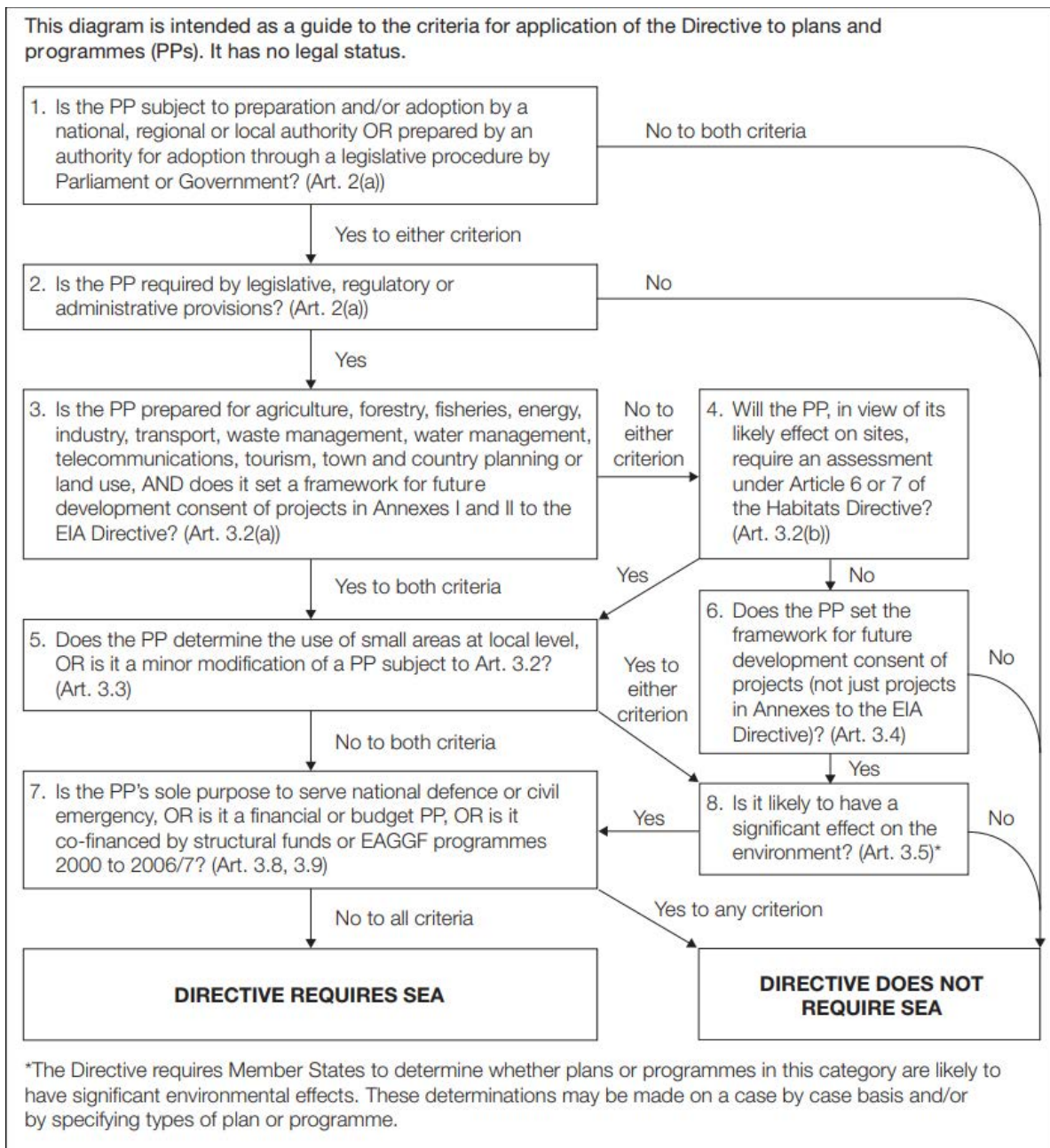
Figure 1 is sourced from 'A Practical Guide to the Strategic Environmental Assessment Directive' published by the Office of the Deputy Prime Minister in 2005⁴. It provides a flowchart guide to determining if a plan meets the criteria for requiring the application of SEA, as per the Directive. The series of questions in the flowchart are applied to the SPD in **Figure 2**.

SEA should be applied where a plan could result in significant effects on the environment. **Table 1** applies the various definitions, criteria and characteristics of a 'significant effect', as per the Directive, to determine if the Flooding, Water Management and SuDS SPD could potentially have such an effect.

³ Available at: [The Environmental Assessment of Plans and Programmes Regulations 2004 \(legislation.gov.uk\)](https://www.legislation.gov.uk) [Accessed: 28/02/23]

⁴ Available at: [A Practical Guide to the Strategic Environmental Assessment Directive \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) [Accessed: 28/02/23]

Figure 1: SEA Screening Guide⁵



⁵ Available at: [A Practical Guide to the Strategic Environmental Assessment Directive \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk) [Accessed: 28/02/23]

Figure 2: Applying the series of questions from Figure 1 to screen the Flooding, Water Management and SuDS SPD

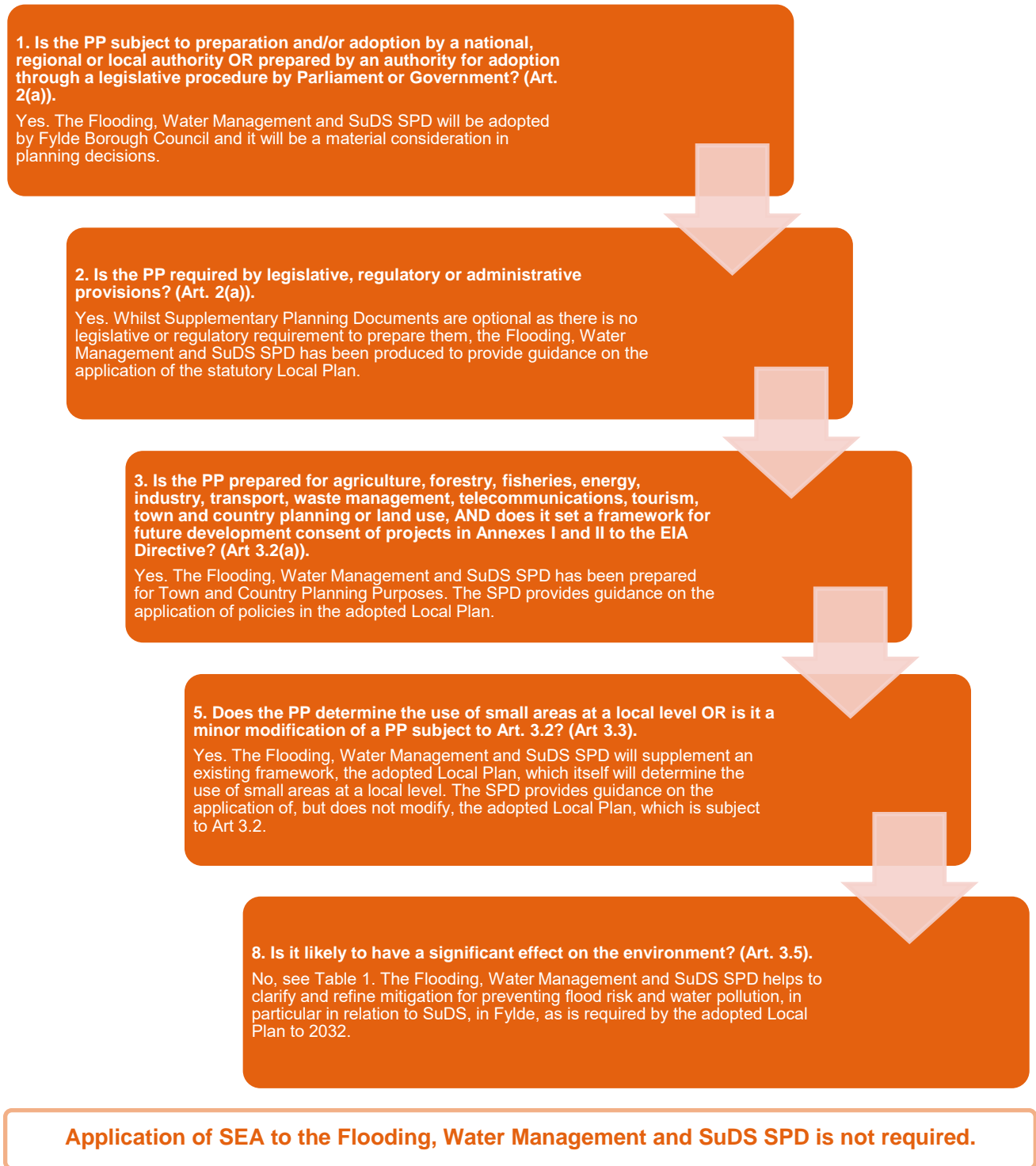


Table 1: Establishing whether the Fylde Flooding, Water Management and SuDS SPD could potentially have a likely significant effect (LSE) on the environment, in accordance with the criteria of a 'significant effect' per Schedule 1 of the SEA Regulations

SEA Regulations Criteria	Response	Is there an LSE?
1. Characteristics of plans and programmes, having regard, in particular, to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Flooding, Water Management and SuDS SPD sets framework for projects by providing detail and guidance on policies of the adopted Fylde Local Plan, particularly Policy CL1: Flood Alleviation, Water Quality and Water Efficiency and Policy CL2: Surface Water Run-Off and Sustainable Drainage. The SPD does not allocate any land for specific uses including land for flood mitigation or flood protection.	No
1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The Flooding, Water Management and SuDS SPD does not create new policies, but instead it provides further guidance to relevant Fylde Local Plan policies and will not influence documents above it. The guidance of the SPD will not be in conflict with the National Planning Policy Framework (NPPF).	No
1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The SPD provides guidance on the interpretation of local policy along with national guidance, all of which promote sustainable development. The SPD does not introduce new policy which is in conflict with the NPPF or existing adopted Local Plan.	No
1d) Environmental problems relevant to the plan or programme.	SPD promotes sustainable development in terms of water management and flooding. Some relevant environmental problems include flooding issues caused downstream of a proposed development, surface water assets by developers which may not be maintained in the long term and pollution issues as a result of leaching. There are no negative environmental issues associated with this SPD. The SPD seeks where possible to achieve environmental improvements via steering development to areas with the lowest probability of flooding, flood risk mitigation measures include the use of SUDS for new development, encouraging the use of water efficient and recycling devices in new development.	No
1e) The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	Due to the detailed nature of the Flooding, Water Management and SuDS SPD, it has no relevance to the implementation of community legislation on the environment, over and above that of the existing policies within the Fylde Local Plan.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects.	The Flooding, Water Management and SuDS SPD is not expected to give rise to any significant adverse environmental effects.	No

SEA Regulations Criteria	Response	Is there an LSE?
2b) The cumulative nature of the effects.	Flood risk can be increased because of other developments. The SPD refers to the issue of increasing flood risk elsewhere which is linked to cumulative effects. The SPD states adhering to NPPF that strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. All plans should apply a sequential and exception test as appropriate and take risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.	No
2c) The transboundary nature of the effects.	Flooding is not contained within borough boundaries, and therefore any development allocations in neighbouring areas could have an impact on the situation in Fylde, and vice versa. However, any potential significant transboundary environmental effects have already been assessed as part of the Local Plan.	No
2d) The risks to human health or the environment (e.g. due to accidents).	The SPD seeks to elaborate on policies relating to flood risk. Flood risk can affect human health and the environment. The contents of the SPD seek to reduce flood risk and therefore reduce impacts on human health and the environment.	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The SPD will be applied to all relevant planning applications in the Plan area.	No
2f) The value and vulnerability of the area likely to be affected due to (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use	The SPD references Saint Anne's on the Sea Neighbourhood Development Plan in which 'Policy SU1: Incorporate sustainable urban drainage into new development' requires that new developments to incorporate SuDS to the maximum standards stipulated in DEFRA's Non-Statutory Technical Standards for SuDS unless agreed otherwise with Fylde Council to avoid any effects on water quality and efficiency. Where there are no reasonably available sites in Flood Zone 1, the Fylde Council will take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exceptions Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. The SPD does not allocate any land for specific uses including land for flood mitigation or flood protection.	No
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	No relevance	No

Screening Decision

The screening has determined that the Flooding, Water Management and SuDS SPD does not meet the criteria for a plan that requires the application of SEA (**Figure 2**). The results presented in **Table 1** show that the SPD would also be unlikely to result in significant effects on the environment.

It should also be noted that the nature of the Flooding, Water Management and SuDS SPD, i.e. the provision of guidance and advice in order for development in Fylde to satisfy the requirements of policies in the Adopted Local Plan to 2032, would be expected to only lead to positive effects on water, biodiversity and soils in Fylde and no adverse effects would be likely.

It is therefore concluded that SEA does not need to be applied to the Flooding, Water Management and SuDS SPD.

Consultation

This SEA Screening Report was issued for consultation with the three statutory bodies: Natural England, Environment Agency and Historic England. They all agreed that SEA would not be required for the Flooding, Water Management and SuDS SPD. Their responses can be found in Appendix A.

Appendix A

Consultation Responses



By Email: [REDACTED]

Our ref: PL00792864
Your ref:

Date: 24 April 2023

Dear [REDACTED]

Fylde Council Flooding, water management and SUDs SEA Screening

Thank you for your email dated 18 April 2023 regarding the proposed SPD SEA screening statement.

Historic England is the Government’s statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England’s historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England has produced a document, which you might find helpful in providing guidance on the effective assessment of the historic environment in Strategic Environmental Assessments. This can be found at <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>.

In terms of our area of interest, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing policies which have already been subject to a Sustainability Appraisal. As a result, we would endorse the conclusions that it is not necessary to undertake a Strategic Environmental Assessment of the document.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]


[REDACTED]

Historic Environment Planning Adviser (North West)
Historic England
Telephone: 0161 242 1423
e-mail: [REDACTED]



For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely


Operations Delivery
Consultations Team
Natural England

Good Morning, we were recently consulted by Arcadis on the SEA screening for Fylde Council's Parking Provision SPD and also the SEA screening for the draft Flooding, Water Management and SuDS SPD. I can confirm that we concur that additional SEA screening is not required for these two SPDs and we look forward to being consulted on the Flooding, Water Management and SuDS SPD in due course.

Best Regards



Sustainable Places Advisor, Environment Agency Cumbria and Lancashire

clplanning@environment-agency.gov.uk

www.gov.uk/environment-agency



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DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
HEAD OF PLANNING	EXECUTIVE COMMITTEE	17 OCTOBER 2023	8
PROVISION OF PARKING ON NEW DEVELOPMENTS SUPPLEMENTARY PLANNING DOCUMENT - ADOPTION			

PUBLIC ITEM

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

RELEVANT LEAD MEMBER

This item is within the remit of Lead Member for Corporate and Economic Development (Councillor Karen Buckley).

PURPOSE OF THE REPORT

The Provision of Parking on New Developments Supplementary Planning Document (SPD) (Appendix 1) gives the Council support in its implementation of Policies GD7, T4 and T5 of the Local Plan, by establishing local parking standards for new development sites as set out in Table 2 of the document; setting out detailed requirements for the layout, spacing, design, landscaping and siting of parking within development sites; providing guidance on electric vehicle charging points; and advising on the documentation required to be submitted with planning applications.

The SPD has been revised from the draft version having regard to representations received during the consultation. The Summary of Responses (Appendix 2) gives details of the representations made to the consultation and provides a consideration of the responses proposed by the Council, noting where changes are considered necessary.

The Screening Opinion, which concludes that Strategic Environmental Assessment/ Sustainability Appraisal is not required on the Draft Provision of Parking on New Developments SPD, is also provided for members' information (Appendix 3).

Members are invited to adopt the Provision of Parking on New Developments SPD, having regard to the contents of this report and supporting appendices. The document will then be used to inform the validation and determination of planning applications by the council.

RECOVERABILITY

This decision is recoverable under section 7 of part 3 of the constitution.

RECOMMENDATIONS

1. That the results of the Screening Opinion conducted on the Draft Provision of Parking on New Developments SPD as set out in Appendix 3 are noted;
2. That the responses to the consultation on the Draft Provision of Parking on New Developments SPD as set out in the Summary of Representations (Appendix 2) are noted;
3. That the Provision of Parking on New Developments Supplementary Planning Document (Appendix 1) is adopted for development management purposes.

REPORT

INTRODUCTION

1. Supplementary Planning Documents (SPDs) provide greater clarity as to the requirements of Local Plan policies for specific situations or types of development. SPDs may not make policy, but rather provide guidance on the application of the policies contained in the adopted Fylde Local Plan to 2032 (incorporating Partial Review) (the Local Plan).
2. Paragraph 3.9 of the Local Development Scheme 2020 identifies an SPD addressing parking issues as one of the next suite of SPDs to be produced to support the policies of the adopted Fylde Local Plan to 2032 (incorporating Partial Review). The Provision of Parking on New Developments SPD is considered necessary for a number of reasons:
 - The existing standards are out-of-date and in part not in accordance with national policy;
 - The existing standards involve a highly complicated calculation to assess provision;
 - Clarity is needed on sizes of parking spaces to reflect the increasing size of vehicles and need for provision for different types of vehicle;
 - Pedestrian circulation space around parking has often not been provided;
 - There is a lack of guidance on vehicular manoeuvring space from parking areas;
 - There is a need to ensure sustainable drainage to parking areas;
 - There is a need to reinforce good practice on cycle parking;
 - There is a need for specific guidance on design and landscaping; and
 - There is a need to provide guidance on electric vehicle charging requirements.

THE PROVISION OF PARKING ON NEW DEVELOPMENTS SPD

3. The SPD is divided into eight chapters. Whilst it is expected that some readers will wish to go directly to the standards in Table 2, it is important that the SPD is read as a whole in order that the approach of the Council and the breadth of the requirements is understood.
4. Chapter 1 of the Draft SPD provides an introduction, setting out the background to the Draft SPD and some of the principal issues considered. In particular, it notes that the SPD can only address issues of parking that relate to development proposals.
5. Chapter 2 provides a review of relevant policy, guidance and information, including national and Local Plan policy, previous parking standards and wider guidance documents.
6. Chapter 3 sets out the overall approach to decision making on parking, which emphasises policy compliance rather than adherence to fixed numerical requirements. The guidance provides examples on how the standards would feed into decision-making.
7. Chapter 4 considers the parking standards to be used by the council. It begins by setting out appropriate evidence, in accordance with the requirements of national policy and guidance: accessibility of different areas; type/mix/use of development; local car ownership levels; the need for electric vehicle charging points; and the local context. Maps set out areas where higher levels of accessibility allow for the adoption of different minimum standards from less accessible areas. Bringing this together, Table 2 of the document sets out minimum standards for various groups of proposed uses and developments. The standards are set out for

specified actual proposed uses, notwithstanding the wide range of development types contained within class E (commercial); in uses within Class E the standards will be applied on the basis of the best understanding the Council will have of the final proposed use, based on the details supplied in the application. The standards would be applied flexibly by the Council based on the circumstances of sites and the implications of the proposed levels of parking provision in relation to policy requirements.

8. Chapter 5 carries detail on design requirements for parking on development sites. This begins with guidance on the location of parking areas within the overall layout of developments. The required dimensions of spaces are set out, together with required spacing around the perimeter of parking areas, including provision for pedestrian movement. Guidance is provided on circumstances where extensions or alterations to existing properties involve alterations to the parking arrangements. Requirements for garages are set out in detail. The guidance covers gates, circulation space, operational parking, materials and landscaping, lighting and signage.
9. Chapter 6 provides detailed guidance on parking requirements for other (non-car) types of vehicle, including cycles, motorcycles, spaces for disabled users, mobility scooters, and commercial vehicles including coach parking. The guidance sets out standards and provides design requirements.
10. Chapter 7 provides guidance on provision for electric vehicle charging, on various development types. It includes explanation of permitted development rights, the requirements under Building Regulations, and issues relating to siting of equipment, in particular the development of on-street chargers.
11. Chapter 8 provides guidance on the requirement for Transport Assessments, Transport Statements and Travel Plans to accompany planning applications, including a table setting out the scale of development for which each will be required, and the outcomes that are expected from each. Examples of measures that may be included in Travel Plans are provided.
12. The SPD provides a glossary of terms at the end which is not intended to be exhaustive, but sufficient to assist readers.

SCREENING AS TO WHETHER STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) IS REQUIRED

13. The Environmental Assessment of Plans and Programmes (EAPP) Regulations 2004 gave legislative effect in the UK to the EU Directive 2001/42/EC, requiring strategic environmental assessment (SEA) of certain plans and programmes. They remain in force, subject to certain amendments, following the UK's exit from the EU. In order to ensure that the SPD can be legally adopted, the Council has employed consultants to undertake a brief screening assessment on each SPD being brought forward.
14. The screening assessment of the draft SPD is presented in Appendix 3. The screening concludes that SEA is not required for the SPD (page 8 of the screening document). The statutory bodies that the EAPP Regulations states must be consulted as part of the SEA process concur with this view (Appendix to the screening document).

REPRESENTATIONS MADE TO THE DRAFT SPD AND CONSEQUENTIAL CHANGES

15. Following SEA screening, the draft SPD was published for consultation, in line with Regulation 12b) of the Town and Country Planning (Local Planning) (England) Regulations 2012, for a period of four weeks between 29th June and 27th July 2023.
16. There were responses from 13 consultees. The full detail of the responses, and the Council's recommended response, are set out in the table in Appendix 2, which is in the order of the content of the document. Some content is repeated where it applies to more than one section of the SPD. The Council's response column notes where changes have been incorporated into the SPD.
17. The changes made from the Draft SPD are as follows:
 - Those needed to alter it to a final document, including removal of consultation information at the beginning and in the introduction, and addition of a "How to Use This Document" section in line with existing adopted SPDs.
 - Additional reference to the Active Design guidance by Sport England in Chapter 2.
 - Clarification in paragraph 4.30 that the accessibility levels identified are solely for the purpose of assessing the parking required through this SPD (rather than being a broader judgement on the overall sustainability of any individual site);

- Clarification at the beginning of Table 2 (Parking Standard) that the standards cover all parking at a site (e.g. staff as well as customers);
- Changes to the standards for dwellings to allow garages to be counted towards provision;
- Addition of a requirement of drop-off zones for schools;
- Correction to dimensions of parallel parking spaces to 6m long and addition of disabled parallel parking requirements;
- Clarification in the requirements for garages that a 0.9m buffer is for pedestrian access to the rear of the property where required;
- Addition of a paragraph requiring appropriate measures to mark out parking spaces in historic environments; and
- Addition of requirements for alternative mitigation techniques for sustainable drainage where permeable paving cannot be used.

ADOPTION

18. The Provision of Parking on New Developments Supplementary Planning Document has been the subject of extensive consultation in line with the necessary legislative framework. Where appropriate, the document has been amended to reflect the comments that have been received and so Members are invited to adopt the SPD formally, for use in the validation and determination of planning applications.

CORPORATE PRIORITIES	
Economy – To create a vibrant and healthy economy	✓
Environment – To deliver services customers expect	✓
Efficiency – By spending money in the most efficient way	✓
Tourism – To create a great place to live and visit	✓

IMPLICATIONS	
Finance	None
Legal	None
Community Safety	The SPD incorporates the principles of Secured By Design
Human Rights and Equalities	The SPD sets out disabled parking spacing and provides for the needs of users of all types of vehicle.
Sustainability and Environmental Impact	The SPD follows the principles of sustainable development
Health & Safety and Risk Management	The content of the SPD follows principles of safe highway design where applicable, reflecting established highways practice and following existing guidance and legislation.

SUMMARY OF PREVIOUS DECISIONS
18 th January 2023 Planning Committee resolved that the Draft Provision of Parking on New Developments Supplementary Planning Document together with the Statement of Consultation with the results of the Sustainability Appraisal Screening added, be issued for public consultation.
8 th June 2022 Planning Committee resolved that the Provision of Parking on New Developments SPD (Scoping) be issued for public consultation.
14 th October 2020 Planning Committee approved the LDS 2020 which sets out a list of SPDs which will be produced by officers.

BACKGROUND PAPERS REVELANT TO THIS ITEM		
Name of document	Date	Where available for inspection
Fylde Local Plan to 2032 (incorporating Partial Review)	December 2021	https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/adopted-fylde-local-plan-to-2032-incorporating-partial-review/
Draft Provision of Parking on New Developments SPD	January 2023	https://new.fylde.gov.uk/wp-content/uploads/2023/06/Draft-Provision-of-Parking-on-New-Developments-SPD.pdf
Statement of Consultation (Draft Provision of Parking on New Developments SPD)	January 2023	https://new.fylde.gov.uk/wp-content/uploads/2023/06/Reg-12a-Consultation-Statement-for-Provision-of-Parking-on-New-Developments-SPD.pdf
Parking SPD Scoping Document	May 2022	https://fylde.cmis.uk.com/fylde/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=J3PNStlclp3B9bIEqtlnzAy8iOCNjrU7sV6FcgMrTOdlfCrXPcq%2fiA%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lvw%3d%3d=pwRE6AGJFLDNlh225F5QMaQWctPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlq%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJff55vVA%3d&FgPIIEJYlotS%2bYGoBi5oIA%3d%3d=NHdUROburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmYB7X0CSQK=ctNJff55vVA%3d&WGewmoAfeNR9xqBuxOr1Q8Za60lavYmz=ctNJff55vVA%3d&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJff55vVA%3d

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Attached documents:

Appendix 1 Provision of Parking on New Developments SPD

Appendix 2 Summary of Representations Made Under Regulation 13 to the Draft Provision of Parking on New Developments SPD

Appendix 3 SEA Scoping Report



Provision of Parking on New Developments

Supplementary Planning Document

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How to Use This Document

The Fylde Council Provision of Parking on New Developments SPD is designed to assist applicants, developers, agents and consultants understand the Council's Local Plan policies that relate to the provision of parking on developments. It provides guidance that gives further detail on the application of those policies in order to help applicants meet policy requirements. This should enable more rapid decision-making on applications which have followed the guidance set out in the SPD.

Structure of the SPD

Although the contents of the SPD are broken down by theme, it is very important that the SPD be read as a whole. Applicants will normally need to have regard to all of the chapters when bringing forward new development. Only for small scale works such as householder extensions will it be appropriate to refer solely to individual sections.

Following the introduction and review of policy and guidance, chapter 3 of the SPD explains the approach and how standards will be applied. Chapter 4 sets out the evidence supporting the parking standards in different locations, including maps of the areas to which the different standards apply; at the end of the chapter, Table 2 sets out the Parking Standards for various types of development.

Chapter 5 is concerned with design aspects including siting, spacing, provision for pedestrians, garages, landscaping, gates and lighting. Chapter 6 covers parking for other types of vehicle including cycles which will need to be considered for all developments. Chapter 7 covers the issue of electric vehicle charging. The requirement for supporting information in the form of transport statements and transport assessments, and guidance on Travel Plans, is covered in Chapter 8. A glossary can be found at the end of the main content.

1. Introduction

- 1.1 Supplementary Planning Documents (SPDs) provide further detail and guidance in relation to policies and proposals within the Development Plan, in this case the Fylde Local Plan to 2032 (incorporating Partial Review) which was adopted by the Council on 6th December 2021. The main objective of the SPD is to provide clarity to applicants as to the requirements for parking on development sites.
- 1.2 As a Supplementary Planning Document, the Provision of Parking on New Developments SPD can only provide guidance on how the Council will respond to development proposals through the planning process. It cannot address standing issues that residents or businesses may have regarding parking, except in circumstances where a development proposal that is the subject of a planning application can contribute towards the resolution of the issue.
- 1.3 The Provision of Parking on New Developments SPD will supersede the existing adopted standards which are the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005).
- 1.4 The Borough of Fylde comprises the major coastal resort towns of Lytham and St Annes, the market town of Kirkham and its adjoining settlement Wesham, developed areas forming the outskirts of the adjoining Borough of Blackpool, the settlements of Freckleton and Warton, and an extensive sparsely-populated rural area. Issues relating to parking vary between areas of the Borough; the Council needs to be able to provide guidance for parking that reflects the circumstances of the area concerned.
- 1.5 The Government aims that one half of all trips within towns will be made by cycle or on foot by 2030. However, in Fylde, existing cycle parking infrastructure is very poor. It is therefore critical that cycle parking infrastructure is provided in association with developments.
- 1.6 The government is encouraging a move towards electric vehicles and in 2021 18.6% of new cars were electric or plug-in hybrid. The proportion of electric vehicles is likely to continue to increase significantly. Parking areas required on development sites will need to incorporate appropriate charging facilities.

2. Policy and Guidance Review

The Local Plan

2.1 The latest adopted version of the Local Plan is the Fylde Local Plan to 2032 (incorporating Partial Review), which was adopted on 6th December 2021.

2.2 Local Plan Policy T5 states that

Parking Standards

Car parking should, wherever possible, be provided on site so as to ensure there is no detrimental effect on highway safety.

A flexible approach to the level of car parking provision will be applied, dependent on the location of the development concerned.

2.3 The supporting text states:

11.60 The Council is aware of the need to manage car parking on all new developments. Local circumstances need to be taken into account when setting local parking standards. The standards set will be for the provision of the minimum number of parking spaces on a site.

2.4 The Local Plan commits the Council to producing an SPD:

11.61 The Council will prepare a Supplementary Planning Document (SPD) on parking standards, which will set out local minimum standards which will need to be applied to all new developments in Fylde.

2.5 In addition, Local Plan Policy T4 promotes a shift away from car use towards public transport, walking and cycling. Policy T4 also promotes electric vehicles:

i) Support the shift towards new technologies and fuels by promoting low carbon travel choices and encouraging the development of ultra-low carbon / electric vehicles and associated infrastructure

2.6 In addition, Policy GD7 places requirements on applicants regarding parking areas:

j) Ensuring parking areas for cars, bicycles and motorcycles are safe, accessible and sympathetic to the character of the surrounding area and that highway safety is not compromised.

2.7 Policy GD7 also sets out requirements on the layout of development, of which parking is a key component:

k) Ensuring the layout, design and landscaping of all elements of the proposal, including any internal roads, pedestrian footpaths, cycleways and open spaces, create user friendly, sustainable and inclusive connections between people and places resulting in the integration of the new development into the built and historic environment.

2.8 The same policy considers certain other relevant matters under the sub-heading Highway Safety. The policy is unequivocal about the hierarchy of road users:

The needs of non-motorised users, such as pedestrians and cyclists, should be prioritised over other road users, through design measures.

- 2.9 The policy also specifically highlights the importance of highway safety, and the role that parking plays in maintaining it:

The development should not prejudice highway safety, pedestrian safety, and the efficient and convenient movement of all highway users (including bus passengers, cyclists, pedestrians and horse riders). The development should not reduce the number of on-site parking spaces available, unless there are other material considerations which justify the reduction.

- 2.10 The policy reinforces the requirements for non-motorised users to be prioritised with more detailed provisions:

All development proposals will need to show that appropriate provision is made for public transport services; appropriate measures are provided to facilitate access on cycle or foot; where practicable, ensure existing pedestrian, cycle and equestrian routes are protected and extended; and the needs of specific groups in the community such as the elderly and those with disabilities are fully provided for.

Neighbourhood Plans

- 2.11 The Bryning-with-Warton Neighbourhood Development Plan states that Bryning with Warton Parish Council will work with other bodies to address matters relating to sustainable transport. It states that it will work with the Borough Council to refurbish the existing village centre car park in order to provide more spaces. It states that a multi-agency village centre strategy will be developed to improve and enhance the principal village centre, including providing additional and safe parking facilities via a traffic management plan.

- 2.12 The St. Anne's on the Sea Neighbourhood Development Plan includes Policy TR2 Better Public Transport. This states that:

The Town Council will work with Fylde Council, Lancashire County Council, Network Rail and the bus and rail operators to encourage effective planning and improvement of public transport, specifically: a) to develop a joint management and improvement plan for St. Anne's and Squires Gate Stations, including: monitoring capacity/adequacy of car and cycle parking and making provision for improvements where feasible, including park and ride facilities

- 2.13 The St. Anne's on the Sea NDP also includes Policy TR3 Residential Car Parking. This states:

Wherever possible car parking should be accommodated within the curtilage of the dwelling in the form of a garage, parking space, or both. For in-curtilage parking, the following principles should be incorporated: a) Garages must be large enough to be useable – internal dimensions of at least 6.4m x 3m are required. b) Garages should be designed to reflect the architectural style of the house they serve. c) Garages should be set back from the street frontage. d) Parking should either be in between houses (rather than in front), or, where it is in front, designed so as to minimise visual impact, particularly by avoiding excessive hard surfacing and loss of existing boundary walls, fences and hedges. Any on-street parking for visitors and deliveries, which is required

and is appropriate, must be carefully designed, avoiding long rows of parked cars. Rear parking areas should be small (serving no more than six homes) so that there is a clear sense of ownership and they must should benefit [sic.] from good natural surveillance.

National Planning Policy Framework

2.14 The National Planning Policy Framework (September 2023) (the Framework) places transport issues at the earliest stages of consideration. It requires (paragraph 104) that (the most relevant to this issue):

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

2.15 The Framework makes explicit reference to parking standards. Paragraph 107 states:

If setting local parking standards for residential and non-residential development, policies should take into account:

a) the accessibility of the development;

b) the type, mix and use of development;

c) the availability of and opportunities for public transport;

d) local car ownership levels; and

e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

2.16 Paragraph 108 covers the setting of maximum standards:

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

2.17 Paragraph 109 covers lorry parking. Only the last part of this is directly relevant to Fylde:

Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

2.18 The Framework requires that policies are prepared with the active involvement of highway authorities. It requires policies to provide for walking and cycling networks with supporting facilities such as secure cycle parking.

2.19 The Framework requires that the design of streets, parking areas and other transport elements of developments reflects current national guidance, including the National Design Guide and the National Model Design Code (paragraph 110). Developments should prioritise pedestrians and cyclists and give access to public transport; should address the needs of the disabled; should create safe, secure and attractive places; should allow for the efficient

delivery of goods, and access by service and emergency vehicles; and should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations (paragraph 112).

- 2.20 All developments that will generate significant amounts of movement should provide a travel plan; applications should be supported by a transport statement or transport assessment (paragraph 113)

Written Ministerial Statement

- 2.21 The statement made by Eric Pickles, Secretary of State for Communities and Local Government, on 25th March 2015 sought to clarify national policy. It reinforced the abolition of maximum parking standards and stated that the market was best placed to decide if additional parking spaces should be provided. The text was taken up by the updated Framework in paragraph 108 (see above).

Planning Practice Guidance (PPG)

- 2.22 The PPG section on Travel Plans, Transport Assessments and Statements sets out the role of each of these documents in supporting development proposals. Travel Plans are long-term management strategies to integrate sustainable travel into developments. They should identify opportunities for sustainable transport initiatives in connection with developments, thereby reducing demand for travel by less sustainable modes. Transport Assessments are thorough assessments, net of the effects of the Travel Plan, of the transport implications of development; Transport Statements are lighter touch evaluations where developments will have only limited impacts. Both may propose mitigation measures where necessary.
- 2.23 Travel Plans, Transport Assessments and Statements support national planning policy to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development on locations that are or can be made sustainable. They should: be proportionate to the development proposed; build on existing information; be established at the earliest stage; be tailored to local circumstances; involve collaborative ongoing working with relevant bodies.
- 2.24 Local planning authorities should judge whether a Travel Plan is needed on a case-by-case basis, taking into account: the Travel Plan policies of the Local Plan; scale and trip-generation of the development; existing intensity of transport use; availability of public transport; environmental designations; impact on other strategies; cumulative impacts; particular impacts upon which the Travel Plan should focus; national policy.
- 2.25 Travel Plans should consider benchmark travel data, trip forecasts, existing travel habits, proposals to reduce the need to travel to the site, provision of improved public services, parking strategy options (having regard to national policy) and proposals for new/enhanced public transport/walking/cycling facilities.
- 2.26 Local planning authorities should judge whether a Transport Assessment or Transport Statement is needed on a case-by-case basis, taking into account similar issues as noted for Travel Plans above.

- 2.27 Transport Assessments and Statements should consider for inclusion:
- information about the proposed development site layout and access
 - neighbouring uses, amenity and character, existing functional classification of the nearby road network;
 - data about existing public transport provision;
 - travel characteristics of the proposed development across all modes of transport;
 - assessment of trips from relevant committed development in the area;
 - traffic flow data on links and at junctions; identification of critical links and junctions;
 - injury accident records;
 - likely environmental impacts of transport related to the development;
 - measures to improve the accessibility of the location;
 - parking facilities in the area and the parking strategy of the development;
 - ways of encouraging environmental sustainability by reducing the need to travel; and
 - measures to mitigate the residual impacts of development (such as improvements to the public transport network, introducing walking and cycling facilities, physical improvements to existing roads
- 2.28 In general, assessments should be based on normal traffic flow and usage conditions (eg non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours). Projections should use local traffic forecasts such as TEMPRO drawing where necessary on National Road Traffic Forecasts for traffic data.

Manual for Streets

- 2.29 Manual for Streets is nationally-approved detailed guidance on the design of street layouts, predominantly in residential areas. Its chapter 8 covers parking, including cycle parking. It considers detail in the provision of cycle parking, including storage sheds, parking for dwellings including the relationship with garages, options for parking in flats, visitor and communal parking for all types of use. In respect of car parking, it notes that attempts to constrain residential parking provision do not tend to affect the numbers of vehicles and provision of sufficient spaces is important; however, car clubs can be effective and communal spaces can be more efficient in providing for needs. It considers the role of on-street parking and highlights advantages and pitfalls. It provides design advice, considers the role of garages and required space sizes. It provides advice on disabled parking and parking for motorcycles.

Manual for Streets 2

- 2.30 Manual for Streets 2 supplements Manual for Streets. It considers a wider range of street types and focusses particularly on existing streets and how these can be made to work more effectively. Its Chapter 11 considers the issue of on-street parking and servicing as a component of this.

Joint Lancashire Structure Plan (JLSP) Parking Standards 2005: Lancashire County Council

- 2.31 The JLSP standards have been the standards adopted by Fylde Council. It provides tabulated standards for a long list of possible land uses, with reductions in areas of good accessibility. It identifies a hierarchy of settlements when applying accessibility reductions to A1, A2, B1 and D2 uses. For other uses, accessibility questionnaires are provided (separate versions for residential and commercial uses) to be completed by the applicant. The standards are maximum standards in accordance with national policy when they were first published.

Lancashire County Council Access and Parking SPG 2005

- 2.32 The Access and Parking SPG is the companion to the JLSP parking standards, incorporating them as appendices. It explains the calculation of parking standards according to the JLSP standards, and provides general guidance on the design and layout of parking.

Creating Civilised Streets (Lancashire County Council, 2010)

- 2.33 Creating Civilised Streets provides a guide by the local highway authority for the design of streets within new developments. The section on parking on pages 31-33 provides an overview of the design requirements for parking, particularly on-street parking. The guide notes draft parking standards in the draft regional plan of the time which are now out-of-date and non-compliant with national policy.

Local Transport Note 1/20 Cycle Infrastructure Design (Department for Transport)

- 2.34 This Local Transport Note provides official guidance from DfT for local authorities on cycling infrastructure. It includes a chapter specifically concerning the design of cycle parking.

Fylde Council Corporate Plan 2020-2024

- 2.35 The Corporate Plan includes the ambition to “Provide parking solutions that meet the needs of residents, workers and visitors”.
- 2.36 It translates this into specific actions: *“Work with partners in town centres to: ...• provide car parking to attract customers”, “Explore opportunities to introduce electric car charging points”, “Promote the resident’s car parking permit and simplify the offer”, “Work with LCC to develop car parking options for the coastal promenades and manage overnight parking provision” and “Review motor home parking provision”*

Highway Code 2022

- 2.37 The updated Highway Code provides statutory advice and regulations for all road users. The updated version places emphasis on the hierarchy of road users, with those most vulnerable having the greatest importance.

Active Design (Sport England / David Lock Associates, 2023)

- 2.38 This document provides advice on the design of all types of development in ways that encourage physical activity. Throughout the document there is a repeated stress on the importance of cycle parking in conjunction with all types of development.

3. Overall Approach to Parking Requirements

- 3.1 The Council's approach to parking on development sites is set out in this section. The overall principle is intended to be to avoid a "tick-box" approach to standards: the key issue is whether the development proposal will result in a conflict with the Council's Local Plan policies and/or national planning policies.
- 3.2 These conflicts may arise due, for instance, to a hazard to highway safety, harm to residential amenity or poor design. This section of the SPD considers these policy conflicts further and shows how decisions will be made by the Council through the application of the standards to identify policy conflicts.
- 3.3 The parking standards set out in Table 2 in Chapter 4 are benchmark minimum standards. The Local Plan notes that these standards will need to be applied to all new developments in Fylde, but flexibly: *"A flexible approach to the level of car parking provision will be applied, dependent on the location of the development concerned"* (Policy T5); i.e. the standards can be adapted according to the circumstances of the individual planning application.

Highway safety conflicts

- 3.4 Policy GD7 and the Framework require that highway safety is not compromised. Consideration of development proposals will need to include assessment of whether any highway safety concern will arise. The parking standards for the area applied to the development proposal and other guidance within this document will highlight the potential for conflict. Where there is an issue, the applicant will be asked to redesign the scheme to address it. Where this is not possible, the refusal of an application may be necessary.
- 3.5 Example: A backland development is proposed on a through road in a village, utilising space previously necessary for the dwelling at the front to enter/leave in forward gear. The number of spaces for the dwelling at the front is unchanged and sufficient, but the layout is unacceptable (chapter 5) as it would result in reversing onto a highway used by through traffic. No revision to the scheme is possible that would accommodate the necessary layout. Result: refuse on highway safety grounds.
- 3.6 Example: a development of flats is proposed on the site of former commercial premises (but equally the same scenario could apply with a large dwelling) within a town. Insufficient spaces are provided in accordance with standards for the area (already slightly lower to allow for the accessibility of the site). Parking on narrow street requiring pavement parking very likely to result, causing visibility issues for vehicles emerging from existing entrances and obstruction for pedestrians, cyclists and disabled people especially the visually impaired, people of reduced mobility. Result: consider whether the number of units in the scheme could be reduced so that sufficient parking is provided (without resulting in other policy conflicts). If not possible, refuse application on highway safety grounds.

Design and amenity conflicts

- 3.7 Policy GD7, the design policies of Framework, the National Design Guide and neighbourhood plan policies (where applicable) require that development results in high standards of design and amenity. Assessment of planning applications will need to identify potential conflicts. The parking standards will identify potential conflicts, but a fuller analysis of the impacts of parking

provision will be needed. The provision of insufficient parking in relation to the standards may lead to amenity conflicts with policies. In other cases, providing sufficient parking may only be possible through a solution that represents poor design detrimental to the area's character, or has harmful effects on the amenity of neighbouring properties. Examples of both are set out below.

- 3.8 **Example 1:** the conversion of a commercial building in a suburban area of moderate accessibility to provide a large number of residential apartments is proposed. The building occupies the whole plot: a small number of parking spaces are proposed within the existing garage space within the building. The intensification of the use of the existing site would lead to overspill parking into the surrounding streets, on areas not designed for on-street parking. This might lead to a fundamental change to the character of the area that would be detrimental to its visual amenity. It could also lead to harm to the amenity enjoyed by those residents in the area already dependent on those existing on-street spaces that are available, through competition and shortage of spaces. The result would be conflict with policy GD7 (it may also have highway safety impacts).
- 3.9 **Example 2:** a conversion is proposed to a large dwelling in a high-density area, to four flats. Sufficient parking is proposed to meet the standards but the consequence is conflict with policy through impacts on amenity. The development would lead to the parking being a dominant feature of the site, a loss of soft landscaping important for the character of the wider area and overall street scene. No redesign would be possible that would meet the standard and no reduction would be justified. Result: refuse application on the grounds of detriment to the character and appearance of the area, under policy GD7.
- 3.10 **Example 3:** A single dwelling is proposed at the rear of a large plot. Insufficient parking can be provided at the front of the site as only a narrow access is available: therefore the only possible location for parking would be to the rear of the existing dwelling, with vehicles passing very close to habitable room windows, and the potential for headlights from cars lighting across the neighbouring garden into the existing dwelling. The disturbance from the vehicle movements associated would be harmful to the amenity of neighbouring occupiers. Result: refuse due to harm to residential amenity.
- 3.11 A wide range of design considerations is covered in Chapter 5. In cases where the Council considers that the revision of the scheme would be possible and comply with design and amenity requirements, amendments to the proposal will be requested. Where the Council considers that the necessary access and parking to the development cannot be achieved without harm to amenity, the application will be refused.

Reduced requirements through mitigation measures

- 3.12 Development proposals may include measures that result in a reduced need for parking on the site, or for any adverse effects of parking on sites to be reduced or eliminated. The effects of any development proposal are considered net of any such mitigation measures provided, either through Travel Planning (see Chapter 8) or as an integral part of the development proposal. In assessing any development proposal, the measures put forward as mitigation will need to be over and above the standard requirements of policy for the prioritisation of sustainable transport modes and active travel. For instance, cycle racks or sheds should not be considered as mitigation, but as a basic requirement on all sites. Furthermore, mitigation measures must be actual mitigation for effects, not contributions to provide funding for

workplace co-ordinators or council officers to monitor whether mitigation is needed or successful. The Council will seek mitigation measures that promote choice of travel modes in line with national and Local Plan policy. Chapter 8 provides more detail on mitigation measures that can be applied through Travel Planning.

- 3.13 Mitigation measures may allow for a reduction (or in some cases elimination) of parking needed on site, and/or operational parking and access space. This may be essential in allowing the site to accommodate the amount or type of development proposed.

Application of standards where change of use does not require planning permission

- 3.14 The introduction of the use class E (Commercial, Business and Service) groups together a range of uses that previously were considered separately. Changes of use within the new class are not development under the Town and Country Planning Act. However, the level of parking required will need to relate to the specific nature of the development, and will be different between, for instance, a large business unit with relatively few employees and a similar-sized convenience retailer. It would not assist applicants if the Council chose to set a single benchmark parking standard for class E which then would be subject to wide variation in what the Council actually required from applicants. Accordingly, the parking standards include some distinctions within class E to assist assessment of appropriate levels of parking for that particular type of proposed use to be used by planning applicants. When no specific use other than the class E is indicated, the Council will require parking to meet the standard for the types of class E use likely to be attracted to take up the proposed class E accommodation, having regard to the details of the design of the accommodation proposed. Where necessary, the Council will restrict use to a sub-category of Class E in order to prevent change to a use where the parking proposed for the scheme would become inadequate.

Standards for new and existing development

- 3.15 In areas of high accessibility, the Council will apply separate standards, for certain uses, that distinguish between the requirements applied to new-build developments and those where existing buildings are converted for a new use. It would be unreasonable to attempt to impose restrictions on the use of (for instance) the upper floors of an existing town centre building, based on standards required for a new building: such restrictions could render the accommodation unusable. Likewise, demolition of a large building and replacement by a much smaller building simply to accommodate parking is unlikely to be accepted.
- 3.16 Application of separate standards for conversions will be dependent on circumstances and take into account the likely demand for parking from the new use. For instance, where an essential level of parking cannot be achieved for the sub-division of a residential dwelling, the development may be rendered unacceptable altogether.

Standards by area

- 3.17 Similarly, there will be a variation in the standards applied to different areas of the Borough, based on the level of accessibility of those areas. This approach is similar to the previous standards, but without the need for the highly complex accessibility calculation being required.

No financial contributions in lieu

- 3.18 There are authorities elsewhere in the country which require financial contributions in lieu of their normal parking requirements in highly accessible areas. Fylde Council will not penalise applicants in this manner: these are measures which can only have the effect of discouraging sustainable development in accessible locations. More development with reduced parking in highly accessible areas will ensure that sustainable modes of transport are supported by usage through choice, without the need for further subsidy.

4. Parking Standards

- 4.1 This section sets out standards for parking to assist decision-making on development proposals. However as noted in Chapter 3, the purpose of the standards will be to assist decision-making by providing an indication of likely need; however, the decision as to acceptability will be based on policy compliance. Generally, this will not be about numbers of spaces but whether the development proposal complies with policy requirements.

Evidence

- 4.2 The Framework requires that local parking standards should take account of accessibility, type/mix/use, public transport availability, local car ownership and the need for electric vehicle charging points. How these have been considered is set out in the sections below.

Accessibility and public transport

- 4.3 These elements are considered together as they are intertwined: the availability of public transport is a major component of whether a locality is accessible, and the transport networks that serve a locality are likely to determine at least in part the pattern of public transport provision.
- 4.4 The previous standards as set out in the Joint Lancashire Structure Plan 2006 and the Lancashire County Council Access and Parking SPG took account of accessibility through the use of an accessibility questionnaire, through which developers would determine the accessibility of a particular site; for town centre uses, each town was identified at a level within a Lancashire-wide hierarchy of towns, and guidance was provided that applied to all towns at that level throughout Lancashire, again utilising the accessibility questionnaire.
- 4.5 To inform the standards that the Council will apply, this document provides an assessment of the accessibility of different areas of the Borough. The assessment uses some of the indicators used in the previous accessibility questionnaire, but modified to suit the characteristics of the Borough. When considering accessibility, the purpose is to establish whether, in combination, the factors that make a location more accessible are likely to result in increased use of non-car modes that will reduce the demand for parking. Therefore, for the purpose of this SPD, the term accessibility refers to accessibility by modes of transport other than by car, rather than any wider assessment of general accessibility.
- 4.6 In terms of access to a broad range of services, the most accessible locations are those which are close enough to town centres, with a wide range of services, to be casually walkable. The Local Plan defines the boundaries of the town centres within the settlements designated as Key Service Centres: St. Annes, Lytham and Kirkham; the key service centres are those settlements with the widest range of services. Therefore, locations within the designated town centres or a surrounding buffer of 500m are highly accessible; locations within 1000m of the boundary have moderate accessibility. The District Centre at Ansdell provides a more limited but still significant range of services: locations within the District Centre and a 500m buffer have moderate accessibility.
- 4.7 Locations that are sufficiently accessible to lead to lower demand for parking will need to be conveniently located in relation to bus stops, whether for access to workplaces and services beyond the immediate area (in the case of residential development) or for customers and staff

to reach them (in the case of commercial uses). Nationally based data from the National Travel Survey¹ provides a national profile of accessibility of homes to the nearest bus stop. This shows that 14% of homes are within 100m of a bus stop, a further 31% are within 200m, a further 40% (i.e. 85% in total) are within 400m, a further 10% within 600m leaving only 5% of homes more than 600m from a bus stop. Access to buses alone, even at the highest frequencies, are not considered to confer high accessibility. Moderate accessibility (i.e. higher than the baseline level of accessibility, due to bus services being significantly better than the national norm) would need to be at least within 200m of a bus stop, even that being met by 45% of existing homes nationally. However, in applying this criterion, only those stops with sufficient frequency are considered to have above low accessibility, considered below.

- 4.8 The degree of accessibility afforded by being close to bus stops depends on the frequency of services and the destinations served. However, the latter is difficult to quantify sensibly, as some routes serve several settlements on a long route, but which (given the time taken for buses to travel) are not realistically likely to attract people away from using cars. Therefore, this assessment uses frequency of services (in one or other direction, not both) from the nearest bus stop. Moderate accessibility is 4 buses per hour or more; locations with fewer than four buses per hour have low accessibility. Only the areas sufficiently proximate to the stop (as detailed in the previous paragraph) are identified as having more than low level accessibility.
- 4.9 Proximity to railway stations can provide, by itself, a high degree of accessibility where this provides access to other major centres quickly. In Fylde, the stations² at Squires Gate, St Annes, Ansdell, Lytham and Kirkham and Wesham provide relatively fast direct services to Preston, and also provide access to Blackpool South Shore although that is not a main centre. However, the current frequency of the service (hourly) cannot be considered sufficient to make the four South Fylde Line stations provide high accessibility in their own right (although they may contribute where other factors also identify an area as highly accessible). Once projected increases in service frequency are achieved, the accessibility of these locations will be increased.
- 4.10 By contrast Kirkham and Wesham, which has three trains per hour to Preston and two to Blackpool North (for Blackpool Town Centre), links to the towns on the South Fylde Line and hourly direct services to Manchester and Liverpool, is identified as providing high accessibility within 500m and moderate accessibility within 1 km.
- 4.11 In the case of the area of Squires Gate close to the sea front, the area benefits from the proximity to the tram terminus at Starr Gate within the Borough of Blackpool. This provides a local connection to Blackpool Town Centre, Cleveleys and Fleetwood and can be considered equivalent to a high frequency bus service; however, it can be assumed that people will walk further to access the tram than a bus. The area within 500m of the tram terminus is identified as having high accessibility.
- 4.12 The accessibility levels identified above in relation to centres and transport services are used in combination to identify the level of accessibility for each location. All areas within the town

¹ Time taken to walk to nearest bus stop by area type and bus availability indicator: England
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1017044/nts0801.ods

² The station at Moss Side is discounted owing to its remoteness and as improvements to the line are likely to result in substantial reductions in calls made at this stop.

centres plus their 500m buffer, or within 500m of Kirkham and Wesham station or Starr Gate tram terminus, have high accessibility. Areas within 500m of Ansdell District Centre and areas between 500m and 1km of the town centres and Kirkham and Wesham Station have moderate accessibility; however, areas within these and within 200m of bus stops with 4 buses/hour (per direction) have high accessibility. Areas outside the 1km town centre/ Kirkham and Wesham station, 500m Ansdell or 500m tram stop buffer zones have low accessibility unless they are within 200m of a bus stop with 4 buses/hour (per direction), in which case accessibility is raised to moderate.

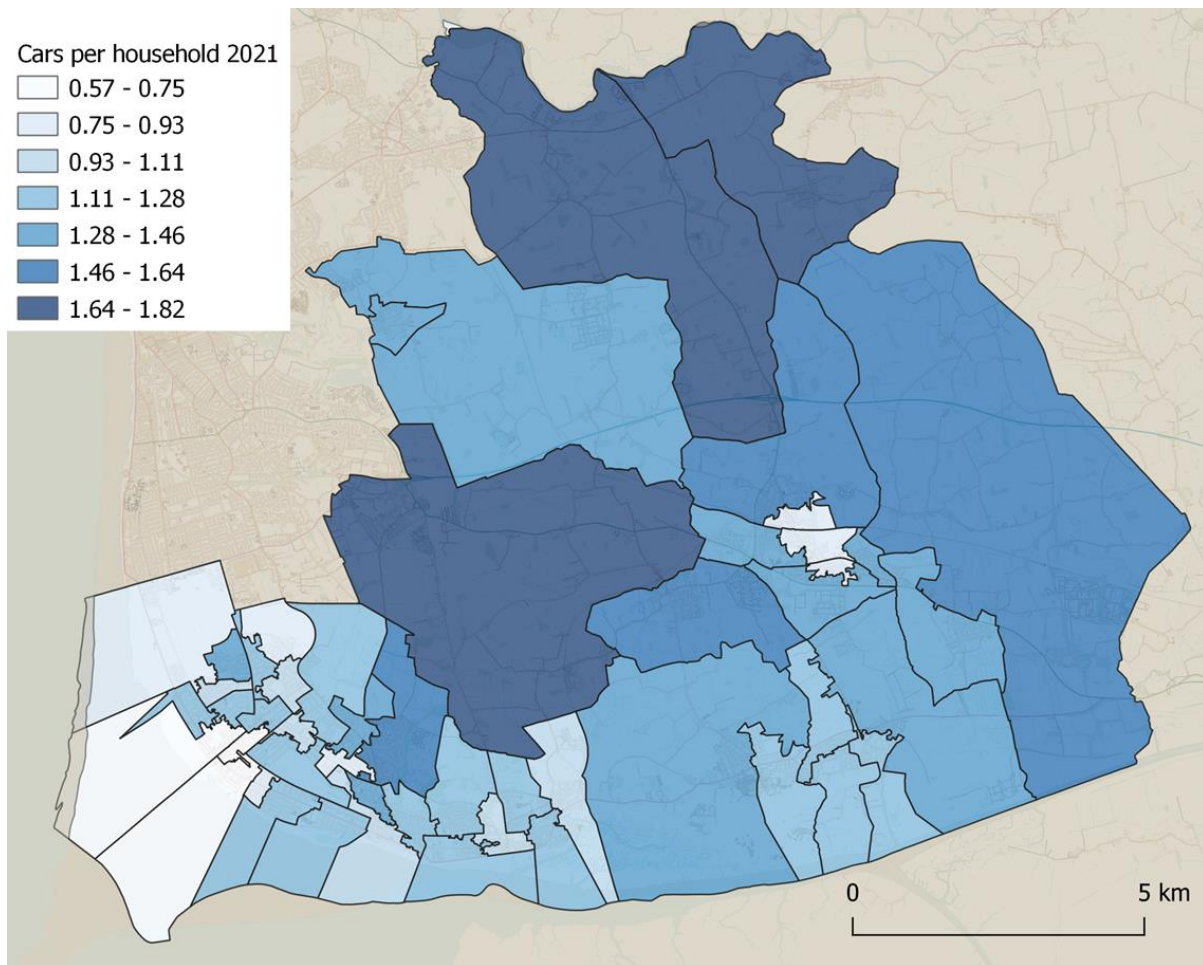
- 4.13 A map showing the accessibility zones is shown in Figures 2, 3 and 4 later in this chapter.

Type / mix / use of the development

- 4.14 The parking standards are set out for distinct uses. In the case of residential schemes, the standards specify the number of spaces for specific dwelling sizes, reflecting the car ownership data (see below), related to the size and type of the proposed dwellings. The availability of alternatives to the car is reflected in the varied standards for different accessibility levels, as discussed above.
- 4.15 In the case of commercial developments and community uses, the standards set for each use reflects a broad understanding of the typical employment density and likely visitor numbers for the uses concerned, together with consideration of the catchment size served (which affects the propensity to walk). In the case of commercial developments where the principal car parking provision will be for staff, account will need to be taken of the actual proposed employee numbers where this is known: the parking standards take account of this.


Car ownership and vehicle numbers


- 4.16 Local car ownership rates for small areas are available from census data. The detailed findings of the Census 2021 are now available. In addition, data for vehicle registrations is available at small area level, for each quarter up to the end of 2021.
- 4.17 Between the 2011 census and 2021 (quarter 4), the number of cars registered per household in the Borough barely changed, from 1.16 to 1.19. Figure 1 below shows the ratio of cars per household for each small area, derived from the 2021 data for cars registered within each small area.

Figure 1: Cars per Household

- 4.18 In addition, the profile of households with different numbers of cars owned is shown in Table 1 below for each small area, this data deriving from the 2021 census.
- 4.19 The results show that, by and large, car ownership rates reflect the accessibility of the location, in particular the proximity to the town centres of St Annes, Lytham and Kirkham. The numbers of households with more than two cars are small in most areas, around 10% of households, but with significantly greater numbers in the rural areas, reflecting the higher incomes, larger households including adult children and larger domestic curtilages typically found in those areas. In almost all locations around 45-50% of households have a single car. Significant numbers of households without cars are found in the most central parts of Kirkham and Wesham, some suburban areas of the northern part of St Annes, central Ansdell, a significant area of central Lytham, but most of all in central St Annes where around 4 in 10 households have no car/van. Most of these areas have a preponderance of smaller households, as well as being more accessible locations.

Table 1 Cars and car ownership

 Over 50% of households with 2 or more cars

 Over 20% of households with no car

Small census area	Ward (best fit)	Cars per household (2021)	% of households with no car/ van (2021)	% of households with one car/ van (2021)	% of households with two cars/ vans (2021)	% of households with three or more cars/ vans (2021)
Fylde 001A	Rural North Fylde	1.73	5.9%	35.6%	40.8%	17.7%
Fylde 001B	Rural North Fylde	1.82	3.3%	37.8%	37.3%	21.6%
Fylde 001C	Rural North Fylde	1.36	10.8%	45.8%	33.2%	10.3%
Fylde 001D	Staining	1.35	8.8%	36.6%	41.4%	13.3%
Fylde 001E	Wrea Green and Westby	1.74	7.1%	40.3%	37.8%	14.8%
Fylde 002A	Kirkham	1.35	7.9%	39.8%	42.0%	10.3%
Fylde 002B	Kirkham	1.35	11.4%	39.4%	36.5%	12.8%
Fylde 002C	Kirkham	0.92	28.3%	46.3%	20.3%	5.1%
Fylde 002D	Kirkham	0.83	32.4%	46.5%	17.0%	4.1%
Fylde 002E	Medlar-with - Wesham	1.48	9.4%	41.3%	37.6%	11.7%
Fylde 002F	Medlar-with - Wesham	0.86	22.7%	50.4%	21.4%	5.5%
Fylde 002G	Wrea Green with Westby	1.49	7.2%	35.3%	42.2%	15.4%
Fylde 003A	Rural East Fylde	1.33	14.4%	43.2%	28.6%	13.7%
Fylde 003B	Kirkham	1.34	12.2%	41.2%	35.3%	11.3%
Fylde 003C	Rural East Fylde	1.55	5.4%	36.4%	39.5%	18.7%
Fylde 003D	Rural East Fylde	1.34	6.8%	38.2%	42.2%	12.7%
Fylde 004A	Kilnhouse	1.18	13.4%	45.3%	32.9%	8.4%
Fylde 004B	Kilnhouse	0.79	33.1%	47.1%	14.5%	5.2%

Small census area	Ward (best fit)	Cars per household (2021)	% of households with no car/ van (2021)	% of households with one car/ van (2021)	% of households with two cars/ vans (2021)	% of households with three or more cars/ vans (2021)
Fylde 004C	Kilnhouse	1.30	8.3%	47.2%	34.8%	9.7%
Fylde 004D	Kilgrimol	0.88	23.4%	48.5%	24.2%	3.9%
Fylde 004E	Ashton	0.98	19.0%	45.8%	27.8%	7.5%
Fylde 005A	Kilnhouse	1.19	15.8%	47.1%	28.2%	8.9%
Fylde 005B	Heyhouses	1.04	16.4%	48.9%	26.9%	7.7%
Fylde 005C	Kilnhouse	1.10	15.5%	52.1%	27.1%	5.2%
Fylde 005D	Park	1.51	5.2%	40.8%	39.5%	14.5%
Fylde 005E	Heyhouses	1.43	11.5%	38.6%	36.2%	13.7%
Fylde 006A	Kilgrimol	1.26	16.1%	48.1%	26.6%	9.1%
Fylde 006B	Ashton	1.24	16.5%	38.3%	36.4%	8.7%
Fylde 006C	Kilgrimol	0.73	40.5%	43.9%	11.9%	3.7%
Fylde 006D	Ashton	0.57	47.9%	37.9%	11.3%	2.9%
Fylde 006E	Carnegie	0.68	36.7%	44.6%	14.1%	4.6%
Fylde 006F	Ashton	1.16	17.6%	46.7%	27.1%	8.6%
Fylde 006G	Carnegie	0.90	35.2%	40.6%	17.8%	6.3%
Fylde 007A	Freckleton Village	1.24	12.5%	45.4%	30.5%	11.6%
Fylde 007B	Freckleton Village	1.27	14.7%	43.1%	30.7%	11.5%
Fylde 007C	Freckleton Village	1.26	11.6%	46.1%	32.4%	9.9%
Fylde 007D	Warton	1.40	9.8%	48.0%	32.9%	9.3%
Fylde 007E	Warton	1.13	13.0%	47.1%	30.1%	9.7%
Fylde 008A	Park	1.17	14.7%	49.8%	28.0%	7.5%
Fylde 008B	Ansdell & Fairhaven	1.08	22.4%	43.6%	25.3%	8.6%
Fylde 008C	Ansdell & Fairhaven	1.30	9.9%	41.2%	38.4%	10.4%

Small census area	Ward (best fit)	Cars per household (2021)	% of households with no car/ van (2021)	% of households with one car/ van (2021)	% of households with two cars/ vans (2021)	% of households with three or more cars/ vans (2021)
Fylde 008D	Carnegie	1.28	10.8%	46.5%	33.3%	9.4%
Fylde 008E	Ansdell & Fairhaven	1.22	15.6%	44.7%	29.9%	9.8%
Fylde 008F	Heyhouses	1.18	13.9%	49.7%	26.5%	9.9%
Fylde 008G	Heyhouses	0.85	29.2%	46.4%	19.5%	5.0%
Fylde 009A	Lytham West	1.02	22.3%	49.3%	22.7%	5.8%
Fylde 009B	Lytham West	1.19	21.2%	45.4%	25.5%	7.9%
Fylde 009C	Lytham West	1.12	14.1%	55.7%	24.1%	6.2%
Fylde 009D	Lytham East	1.10	18.9%	41.0%	32.2%	7.9%
Fylde 009E	Lytham East	1.16	16.1%	45.1%	30.4%	8.4%
Fylde 009F	Lytham East	1.17	11.2%	47.6%	32.0%	9.2%
Fylde	Borough	1.19				

4.20 For the purpose of informing the setting of parking standards, the essentially static position of car ownership levels is anticipated to continue. The level of provision required on development sites as set out in the standards in Table 2 is based on likely numbers of spaces needed informed by typical ownership levels in the localities concerned.

The need for electric vehicle charging points

4.21 Although the take up of electric vehicles so far is significantly lower in the North West than some other regions, provision is needed for the charging of vehicles in the future. The Building Regulations³ specify requirements for electric vehicle charging points. Whilst it would be unreasonable to require developers to provide charging points that lie idle, developments will need to allow for widespread installation of equipment in the future. The requirements for provision of electric charging points are set out in Chapter 7.

4.22 Passive provision for further installations will be required. In addition to the Building Regulations requirements, this will require provision of sufficient space behind the spaces or on the margins of adjoining footways for the infrastructure to be installed. These requirements which relate to design are set out in Chapter 5.

³ <https://www.gov.uk/government/publications/infrastructure-for-charging-electric-vehicles-approved-document-s>

Local Context

- 4.23 The setting of parking standards must be more than a theoretical exercise based on nationally set indicators. The Council considers that, for developments to comply with the design policies of the Local Plan, the particular circumstances of the locality will need to be reflected in the parking standards that apply for the area.
- 4.24 The coastal resort at St Annes is a traditional seaside resort with associated attractions. Tourism-based activity is concentrated mainly within an approximately 1km long stretch between the two main public car parks; in summer this is an area where the on-street car parking is an important resource for the resort. The town centre of St Annes has a wide range of commercial establishments, with time-restricted on-street parking and some off-street parking including a multi-storey car park. St Annes town centre is surrounded on three sides by residential areas of medium density. The approach taken in the town centre is likely to differ from the approach in the mature suburbs of St Annes, reflecting the concentration of town centre uses with limited parking.
- 4.25 In St Annes Town Centre, the parking standards for residential developments allow for small dwelling units within the conversions of upper floors of traditional commercial buildings to be provided without parking, reflecting the much higher propensity for non-ownership of cars within this area and the benefit of bringing such spaces back into use. This does not extend to the areas surrounding the centre, which are areas of limited on-street parking availability.
- 4.26 In the central areas of Kirkham and Wesham, and the central part of Freckleton, parking issues reflect the relative lack of off-street parking in areas of more traditional buildings, narrower streets, greater reliance on on-street parking and a mix of commercial uses within the areas; how these issues are addressed requires a different approach to parking from the approach taken in the newer suburban areas. In Kirkham Town Centre and the immediately surrounding areas (Poulton Street, Preston Street, Orders Lane, Moor Street, Marsden Street, Clegg Street, Kirkgate, Freckleton Street, Market Square, Church Street, Eagle Court, Station Road and Barnfield), the imperative is to retain any on-street parking and off-street public car parking spaces for the customers of the commercial premises in the town centre. Accordingly, residential developments will only be accepted where the standard (as reduced for high accessibility) can be met through on-site provision.
- 4.27 In Wesham, the on-street areas close to the railway station are used for shared parking, with rail users during the day and residents in the evenings and overnight. The density of the existing housing development leads to pressure on parking at crossover times. However, new residential developments in these areas would have a lower need for parking due to very high accessibility. The parking standards allow for the creation of small dwelling units without parking in this area, able to rely on on-street parking, in accordance with the character of the area.
- 4.28 The challenge in Lytham is slightly different from St Annes as in Lytham the town centre is very close to the promenade area, so parking has to provide for the needs of town centre users and visitors together. The strong night time economy, visitors and dense residential areas juxtaposed with the centre leads to parking stress, although there is an increased propensity for non-ownership of cars. Parking for commercial uses in the centre is provided for through on-street parking and public pay-and-display car parks. A residents' parking scheme is in operation in the residential streets that would otherwise be under the greatest pressure. The

area is highly accessible, with lower car ownership and therefore small-scale commercial development supporting the function of the town centre which is able to rely on public provision; residential conversions within the town centre may rely on public provision, but new residential developments will be required to include parking on-site to meet the needs of the development.

- 4.29 The Fylde-Blackpool periphery is a newly developing area where the issues regarding parking differ significantly from the centres of established settlements. In this area, new development provides an opportunity to make places where parking is sufficiently provided for yet does not dominate the street scene. Parking provision within the developing strategic employment site requires scrutiny: particularly important here is the contribution that workplace travel planning can make to allow effective use of land by avoiding extensive areas of parking. The parking standards have been adjusted from those used previously to consider the numbers of staff anticipated on a development site, in order that commercial premises with large numbers of staff are required to provide sufficiently for them.

Bringing the evidence together

- 4.30 The parking standards should be informed by accessibility, development type, car ownership levels and the need for charging infrastructure. The Council has divided the Borough into three areas based on proximity to services, public transport availability, local car ownership levels and the particular form of the local street layout and area character: these are set out in Figures 2, 3 and 4 below. The areas shown within the Borough boundary that are not designated as either high or moderate accessibility have low accessibility for the purposes of this SPD.

Figure 2 Areas of Moderate and High Accessibility, Kirkham and Wesham

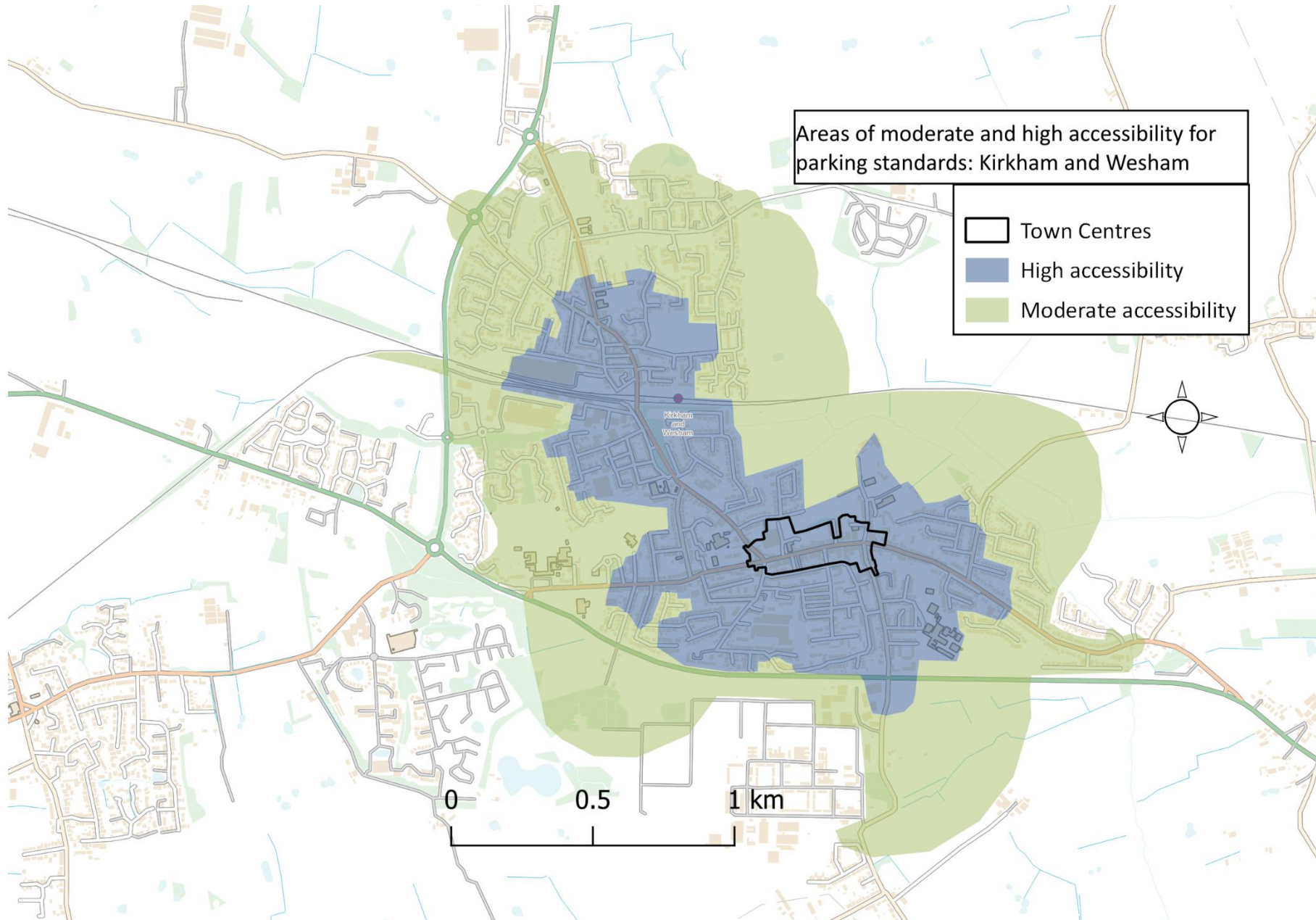
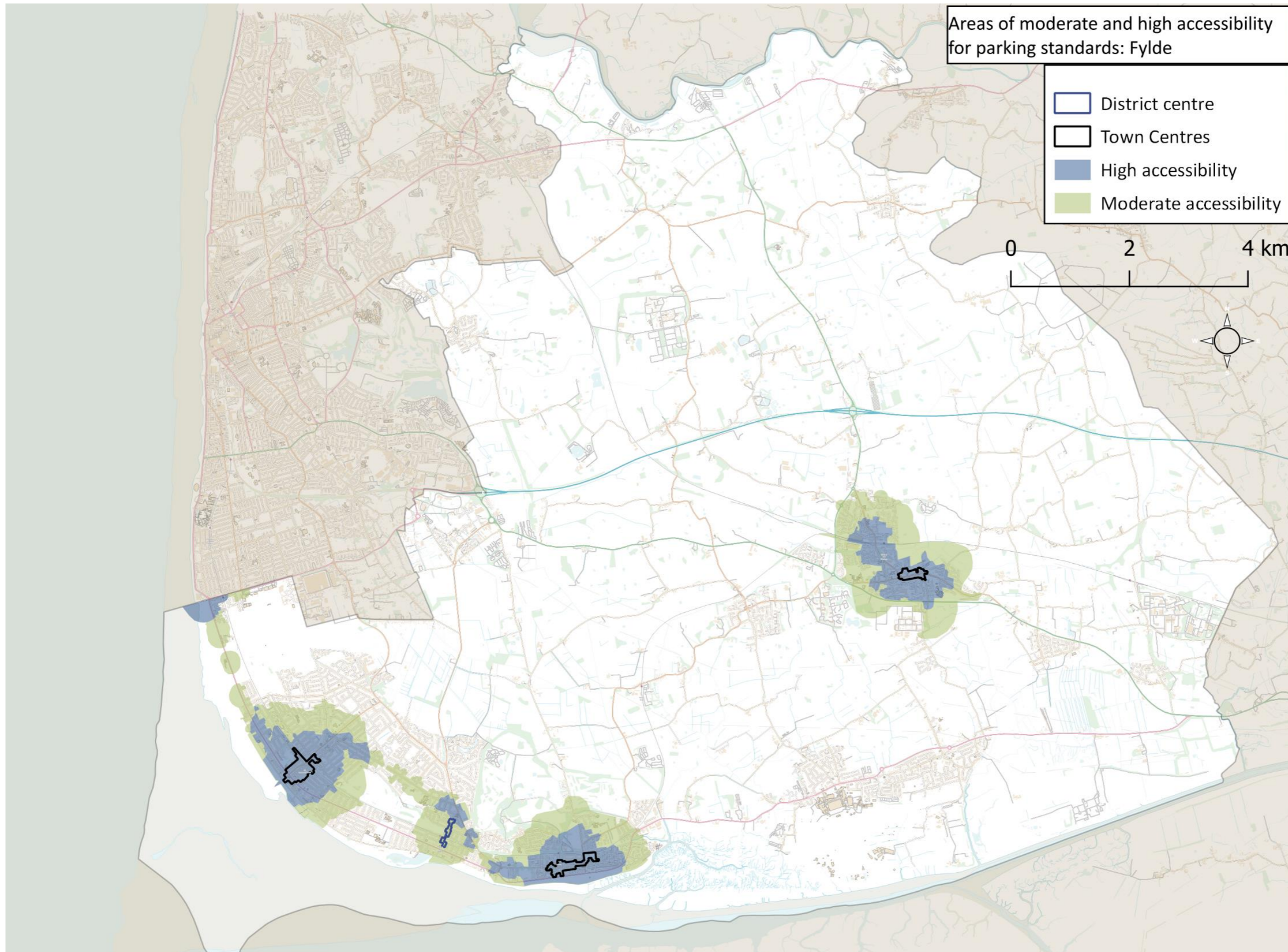


Figure 3 Areas of Moderate and High Accessibility, Lytham and St Annes



Figure 4: Areas of Moderate and High Accessibility, Fylde



- 4.31 By and large, the areas with the highest accessibility have the lowest car ownership levels, and therefore in those areas fewer car parking spaces are required on residential development sites. The areas concerned are principally the town centres and their immediate surroundings, central Wesham and the area of Squires Gate closest to the tram terminus. Most of those same areas, however, are where there is a degree of pressure on car parking, and it is needed to support the functioning of the town centres; accordingly it is imperative that on new residential schemes parking is provided on-site. For commercial uses, whilst new development for commercial uses will generally need to provide parking on site, the imperative is to maintain the vitality of town centres, so new commercial uses in existing smaller premises will be able to rely upon existing public parking provision.
- 4.32 The overall parking standards for cars at different locations are set out in Table 2. The specific requirements for charging points, disabled parking, cycles, motorcycles and other vehicles are set out in chapters 6 and 7.

Table 2: Car Parking Standards for Fylde (Please refer to the boxes in Chapters 6 and 7 for standards for cycle parking, disabled parking and provision for electric vehicles)

For non-residential uses and residential institutions, the standards provide for all parking associated with a site e.g. customers, staff, visitors, spectators, participants, students, patients, residents, stewards etc.

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Dwellinghouses (market housing unless stated)				
HMOs	1 per bedroom	1 per bedroom	1 per bedroom	2 per building, with 1 per 3 rooms, not involving use of existing rear gardens to provide
1 bed flats	1 per flat	1 per flat minus Travel Plan reductions	0.75 per flat with all spaces communal, minus Travel Plan reductions	0.75 per flat with all spaces communal, minus Travel Plan reductions. Within St Annes Town Centre, upper floor conversions to residential can rely on public on-street provision. Within 500m of Kirkham and Wesham station or Starr Gate Tram Stop, can rely on on-street provision
2-bed flats	1 per flat	1 per flat	1 per flat. Within 500m of Kirkham and Wesham station or Starr Gate tram stop, can rely on on-street provision	1 per flat. Within St Annes Town Centre, upper floor conversions to residential can rely on public on-street provision. Within 500m of Kirkham and Wesham station or Starr Gate Tram Stop, can rely on on-street provision

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Sheltered housing/ housing specifically aimed at older people (see also below)	1 per dwelling (1 per 2 dwellings if a care element is included in the provision)	1 per dwelling (1 per 2 dwellings if a care element is included in the provision)	1 per 2 dwellings (1 per 3 dwellings if a care element is included in the provision)	1 per 2 dwellings (1 per 3 dwellings if a care element is included in the provision))
Purpose-built 100% specialist accommodation for the elderly (in accordance with Local Plan Policy H2)	1 per 2 dwellings	1 per 2 dwellings	1 per 3 dwellings	N/A
1-2 bed affordable rented housing	1 per dwelling	1 per dwelling	0.75 per dwelling with all spaces communal	0.75 per dwelling with all spaces communal
2-bed houses	2 per dwelling	1 per dwelling	1 per dwelling	1 per dwelling
3 bed houses	2 per dwelling, of which one may be a suitably-sized garage	2 per dwelling, of which one may be a suitably-sized garage	1 per dwelling	1 per dwelling
4+-bed family housing	3 per dwelling, of which one may be a suitably-sized garage	3 per dwelling, of which one may be a suitably-sized garage	2 per dwelling, one of which may be a suitably-sized garage	2 per dwelling, one of which may be a suitably-sized garage
Residential institutions				
Class C2 Residential care homes/nursing homes	1 per 5 residents	1 per 5 residents	1 per 6 residents	1 per 6 residents
Class C2 Residential schools	As day schools plus 1 space per 20 beds	As day schools plus 1 space per 20 beds	As day schools plus 1 space per 20 beds, minus Travel Plan reductions	As day schools plus 1 space per 20 beds, minus Travel Plan reductions

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Class C2 Colleges/residential training centres/	1 per bed (short courses)/1 per 2 beds (longer courses over 1 month duration) & coach parking for training centres over 1000m ² GFA	1 per bed (short courses)/1 per 2 beds (longer courses over 1 month duration) & coach parking for training centres over 1000m ² GFA	1 per bed (short courses)/1 per 2 beds (longer courses over 1 month duration) minus any Travel Plan reductions & coach drop-off point for training centres over 1000m ² GFA	1 per bed (short courses)/1 per 2 beds (longer courses over 1 month duration) minus any Travel Plan reductions & coach drop off point for training centres over 1000m ² GFA
Class C2 Halls of residence	1 per 2 beds minus Travel Plan reductions	1 per 2 beds minus Travel Plan reductions	1 per 3 beds minus Travel Plan reductions	1 per 3 beds minus Travel Plan reductions
Class C2 Hospitals	1 per bed, including those used in short stay operations	1 per bed, including those used in short stay operations	Reduce as part of Travel Plan	Reduce as part of Travel Plan
Commercial/ community uses				
Class F2/E: food retail	1 per 14m ² GFA	1 per 17m ² GFA	1 per 30m ² GFA. Within town centre boundaries, can be provided by existing public provision where development is under 75m ²	1 per 30m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class E: non-food retail	1 per 20m ² GFA	1 per 23m ² GFA	1 per 30m ² GFA. Within town centre boundaries, can be provided by existing public provision where development is under 75m ²	1 per 30m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class C1 hotels, motels, boarding and guest houses; short-term holiday lets	1 per bedroom	1 per bedroom	1 per bedroom, minus any Travel Plan reductions	1 per bedroom, minus any Travel Plan reductions

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Class E financial and professional services (not medical)	2 per 3 employees minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	2 per 3 employees minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class E café or restaurant (except drive-through)	1 per 9m ² GFA	1 per 9m ² GFA	1 per 12m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 12m ² GFA. Within town centre boundaries, can be provided by existing public provision
Pub or drinking establishment (sui generis)	1 per 9m ² GFA	1 per 9m ² GFA	1 per 12m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 12m ² GFA. Within town centre boundaries, can be provided by existing public provision
Take away (sui generis)	1 per 9m ² GFA, with a minimum of 3 spaces	1 per 9m ² GFA, with a minimum of 3 spaces	1 per 9m ² GFA, with a minimum of 3 spaces	1 per 9m ² GFA, with a minimum of 3 spaces. Within town centre boundaries, spaces can be provided by existing public provision (including short stay) where these are directly in front of the application site
Drive through café, restaurant, retail or takeaway (sui generis)	1 per 9m ² GFA, with a minimum of 12 spaces	1 per 9m ² GFA, with a minimum of 12 spaces	1 per 9m ² GFA, with a minimum of 12 spaces	1 per 9m ² GFA, with a minimum of 12 spaces
Cinemas, concert halls, bingo halls and dance halls (sui generis)	1 per 5 seats Coaches: minimum 1 space for concert/ theatre facilities of 2,500m ² +	1 per 5 seats Coaches: minimum 1 space for concert/ theatre facilities of 2,500m ² +	1 per 8 seats Coaches: dropping off space for concert/ theatre facilities of 2,500m ² +	N/A

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Class E Gymnasiums, indoor recreations not involving motorised vehicles or firearms	1 per 26m ² GFA	1 per 26m ² GFA	1 per 26m ² GFA, can be reduced through Travel Planning	1 per 26m ² GFA, can be reduced through Travel Planning
Class F2 Hall or meeting place for the principal use of the local community	1 per 26m ² GFA	1 per 26m ² GFA	1 per 26m ² GFA	1 per 26m ² GFA, can be reduced through Travel Planning
Class F2 Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms, with 500 or fewer seats or standing spaces	1 per 15 seats	1 per 15 seats	1 per 15 seats	N/A
Class F2 outdoor sports stadia with more than 500 seats or standing spaces	1 per 10 seats Coaches: minimum 1 space for each 1,500 seats or standing spaces	1 per 10 seats Coaches: minimum 1 space for each 1,500 seats or standing spaces	1 per 10 seats Coaches: minimum 1 space for each 1,500 seats or standing spaces	N/A
Class E/F1 Training and conference centres	1 per 37m ² GFA	1 per 37m ² GFA	1 per 37m ² GFA minus Travel Plan reductions; where in connection with hotel development, additional provision over and above the hotel requirement not needed	1 per 37m ² GFA minus Travel Plan reductions; where in connection with hotel development, additional provision over and above the hotel requirement not needed
Class F1 Art galleries, museums and public libraries	1 per 37m ² GFA	1 per 37m ² GFA	1 per 37m ² GFA minus Travel Plan reductions	1 per 37m ² GFA minus Travel Plan reductions

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Class F1 Public halls/exhibition halls/places of worship/law courts	1 per 10m ² GFA	1 per 10m ² GFA	1 per 10m ² GFA minus Travel Plan reductions	1 per 10m ² GFA minus Travel Plan reductions
Class E Office	2 per 3 desk spaces minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	2 per 3 desk spaces minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class E Research and development of products or processes	2 per 3 employees minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	2 per 3 employees minus Travel Plan reductions with an overriding minimum of 1 per 37m ² GFA	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class E Industrial processes (which can be carried out in any residential area without causing detriment to the amenity of the area)	1 per 37m ² GFA	1 per 37m ² GFA	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision	1 per 45m ² GFA. Within town centre boundaries, can be provided by existing public provision
Class B2 Industrial	1 per 45m ² GFA	1 per 45m ² GFA	1 per 45m ² GFA	1 per 45m ² GFA
Class B8 Storage and distribution	1 per 200m ² GFA	1 per 200m ² GFA	1 per 200m ² GFA, can be reduced through Travel Planning	1 per 200m ² GFA, assumed to be provided through existing public provision
Class E Clinics and health centres	4 per consulting room	4 per consulting room	2 per consulting room. Within town centre boundaries, can be provided by existing public provision	2 per consulting room. Within town centre boundaries, can be provided by existing public provision

Proposed development/ use	Standard for rural areas/ low accessibility	Standard for suburban areas/ moderate accessibility	Standard for town centres and vicinity / high accessibility	
			New development	Change of use of existing building
Class E Crèches/day nurseries/day centres	1.5 per 2 staff plus drop-off zone of 1 space per 10 children	1.3 per 2 staff plus drop-off zone of 1 space per 10 children	1 per 2 staff plus drop-off zone of 1 space per 10 children. Further reductions acceptable through Travel Planning	1 per 2 staff plus drop-off zone of 1 space per 10 children. Further reductions acceptable through Travel Planning
Class F1 Schools and sixth forms	1 per classroom/activity area plus drop-off zone of 5 spaces	1 per classroom/ activity area, minus Travel Plan reductions; plus drop-off zone of 5 spaces	1 per classroom/ activity area, minus Travel Plan reductions; plus drop-off zone of 5 spaces	1 per classroom/ activity area, minus Travel Plan reductions; plus drop-off zone of 5 spaces
Class E/F1 Non-residential education and training centres / further and higher education	1 per 2 full-time staff (any residential element considered separately under C2)	1 per 2 full-time staff, minus any Travel Plan reductions (any residential element considered separately under C2)	1 per 2 full-time staff minus Travel Plan reductions (any residential element considered separately under C2)	1 per 2 full-time staff minus Travel Plan reductions (any residential element considered separately under C2)

5. Design, dimensions and layout of parking

- 5.1 Local Plan and national policy place great emphasis on the importance of good design in developments. A key element of good design is the overall layout of development and how the different elements of any development, which will usually include parking, come together to make an attractive and well-functioning whole, within the context of the wider setting. Key elements of this include the functionality of parking areas including sizes and detailed layout, relationship with landscaping and positioning within the site.

Siting of Parking Areas Within Development Sites

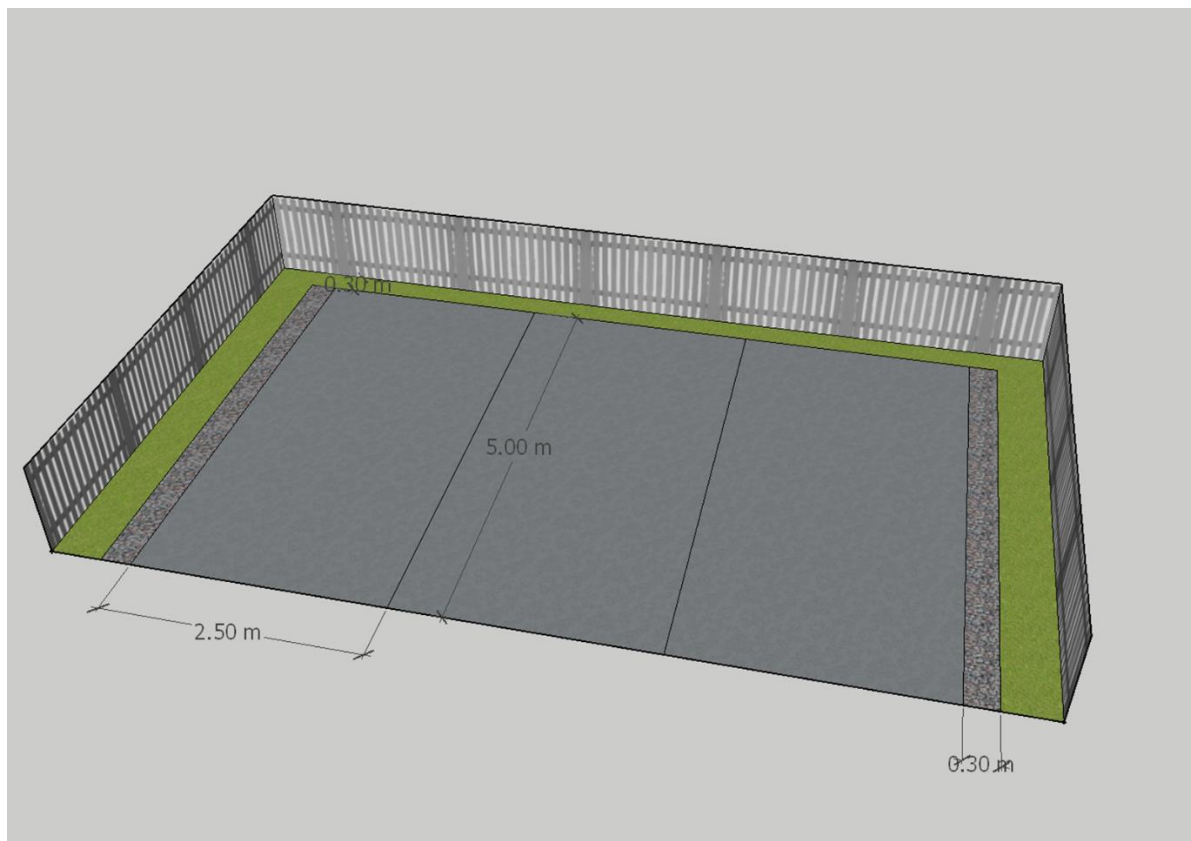
- 5.2 The siting of parking spaces within the overall layout of development sites is a critical element in the overall strategy for the layout of development sites. It is therefore necessary to consider it at the earliest stage of the design process.
- 5.3 In any type of development, the siting of parking should not result in a development that faces inwards upon its curtilage, creating effectively an enclosed compound; wherever the parking is located, the development and its principal entrance should face the street.
- 5.4 Within new residential layouts, in the case of houses, it is preferable that parking spaces for cars are located within the curtilage of the dwelling in order to provide for electric vehicle charging. Parking should be accessed from the front where the overall street layout allows, otherwise to the side (e.g. on a corner plot): “Radburn”-style arrangements where the vehicular entrances are at the rear and separated from the pedestrian entrances across the site should be avoided. The area devoted to parking should not fill the frontage of any dwelling however: the layout will need to incorporate sufficient space to accommodate soft landscaping as described in the Landscaping and Materials section below, and for separate pedestrian access, as described in the Provision for Pedestrian Movement section also below. Where insufficient space is available due to the narrow frontage of the dwelling, it may be preferable to site the pedestrian footway between the parking spaces and the dwellings; in such cases the electricity supply for electric vehicle charging will need to be pre-installed via conduits underneath and across the footway. Parking spaces should be positioned offset as far to the side of the frontage as can be achieved, in order that the parking does not appear to be directly in front of the dwelling.
- 5.5 Where flats are proposed, parking should be sited wherever possible in a single area, designed to minimise the impact on the street scene and on residential amenity. In particular, the use of ground floor or below ground level undercourts for parking on new-build schemes is encouraged. The Council will discourage flat schemes dependent on large areas of hardstanding in the front of the curtilage, prominent in the street scene, and will require careful and effective use of soft landscaping to mitigate effects on the street scene in order for such proposals to be acceptable. Where flats are proposed either through new build or through a conversion of a dwelling, the use of a large proportion of the rear of the site for parking will not be accepted where the curtilage adjoins private domestic gardens or yards, or where parking and access would be close to neighbouring habitable rooms.
- 5.6 On new-build commercial sites and other non-residential uses, the layout of the site should ensure that access to the development for pedestrians is prioritised. For developments where large numbers of members of the public will visit, such as retail and leisure uses, this will

normally mean locating the building close to the highway, so that the access route for pedestrians is short, with parking placed to the side. For any uses with extensive parking areas, the area close to the front of the building should be dedicated to disability, visitor and cycle parking, together with soft landscaping to minimise the effect of parking on the street scene; where extensive parking is required for employees rather than visitors, this should be to the rear of the building; however in such cases the main entrance should nevertheless face the street. For smaller new-build commercial uses, it may be possible to accommodate all parking at the front of the site but this should not be the approach where it leads to the main building being set back within to site to a degree that is incongruous with the character of the area.

Dimensions and Spacing

- 5.7 This section sets out requirements for the dimensions of parking spaces in different circumstances, and requirements for additional space adjoining spaces. It should be read in conjunction with the section on manoeuvring space below.
- 5.8 The basic dimension of a parking space is 2.5m x 5.0m. This assumes that either the parking space adjoins other parking spaces on either side, or that additional space is available to the side of the space. Where additional space to the side of the space is provided, it should provide at least 0.3m of additional width. Such space should be hard surfaced and should not involve areas of soft landscaping unless the space available is very restricted.

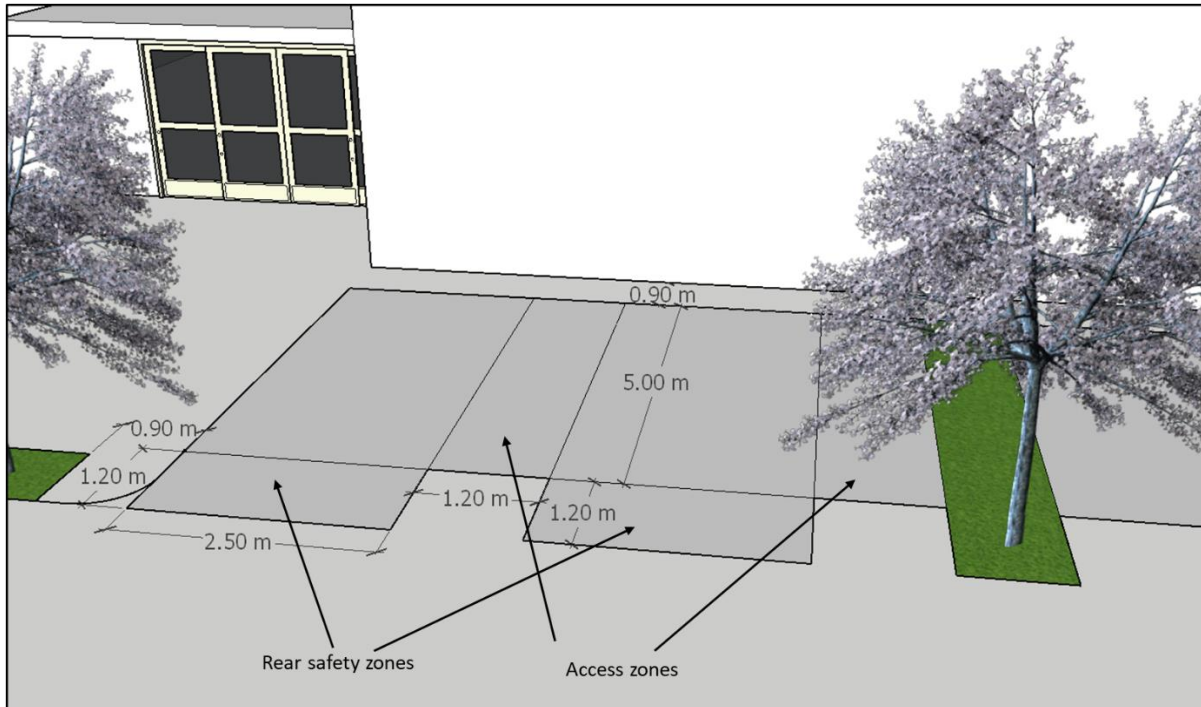
Fig. 5 Basic Spacing



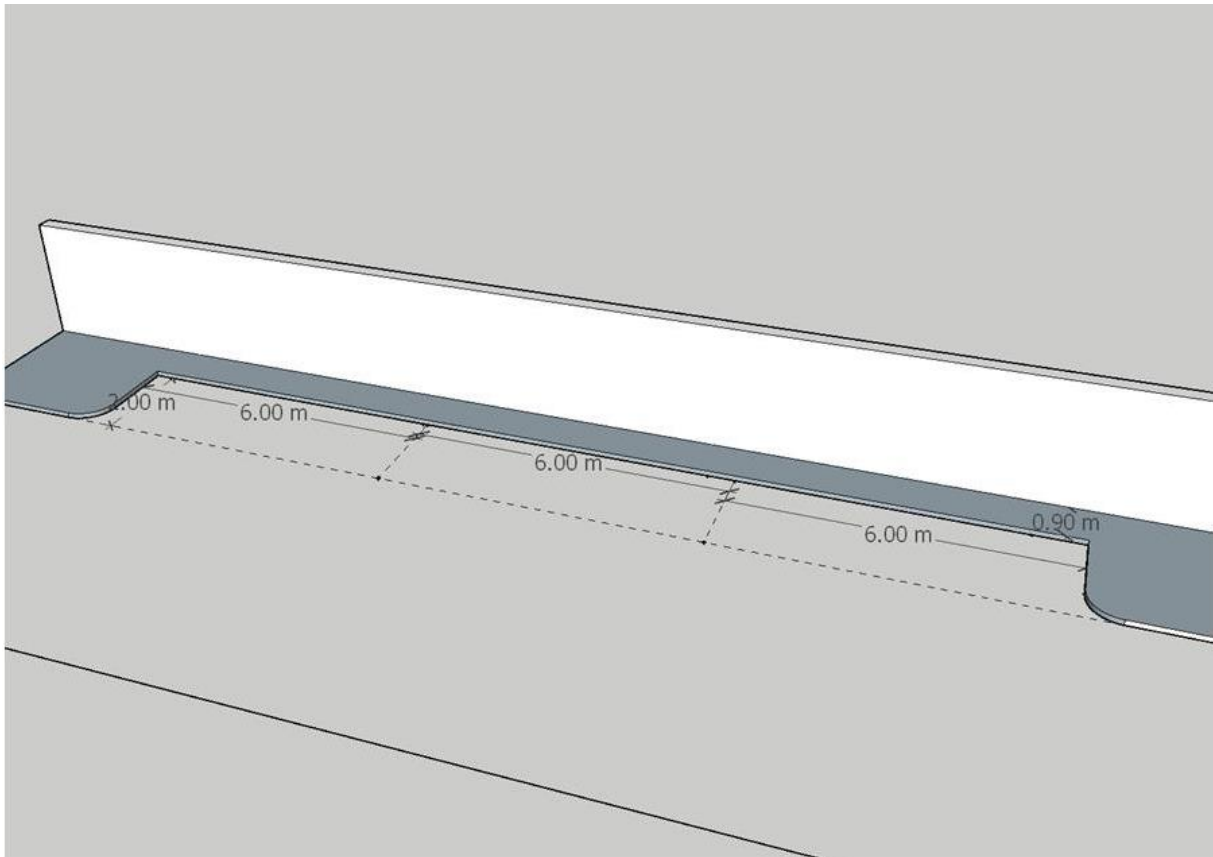
- 5.9 Disability spaces should be 2.5m x 5.0m with a 1.2m marked access zone between the spaces. A 1.2m wide rear safety zone for boot access should be provided. Although the rear safety

zone may be provided at either end of the parking space, if it is provided at the end of the vehicle access lane, the vehicle access route should be widened at that point by 1.2 metres to accommodate it; if it is provided at the opposite end of the parking space, the rear safety zone should not encroach on pedestrian access routes which should be widened to accommodate it. In either case, safe access routes for the disabled person to leave and return to the vehicle will need to be provided, reachable from all sides of the space.

Fig. 6 Disability spaces



- 5.10 Where one end of a parking space is against a hard barrier such as a wall or posts, or a soft landscaping barrier such as a hedge, either the parking spaces should be lengthened by 0.3m or additional hard-surfaced space 0.3m wide should be provided.
- 5.11 Where a single width of parallel parking spaces alongside an access roadway are provided, they should be 2.0 metres wide. Given the significant variation in length between vehicles, it is not necessary to set markings for length; however, for the purpose of assessing the number of spaces provided, a space will be considered to be 6.0 metres long. At each end of the parallel parking area, an additional 0.3m of unobstructed space will be required to allow vehicles to enter and exit the area with parallel parking movements. Parallel parking spaces will require provision of additional paved width of 0.9m for pedestrian access on the opposite side to the vehicular access route, such as through provision of a kerbed pedestrian footway on that side. Where parallel spaces intended for disabled users are provided, they must be a minimum of 6.6 metres long and 3.0 metres wide.

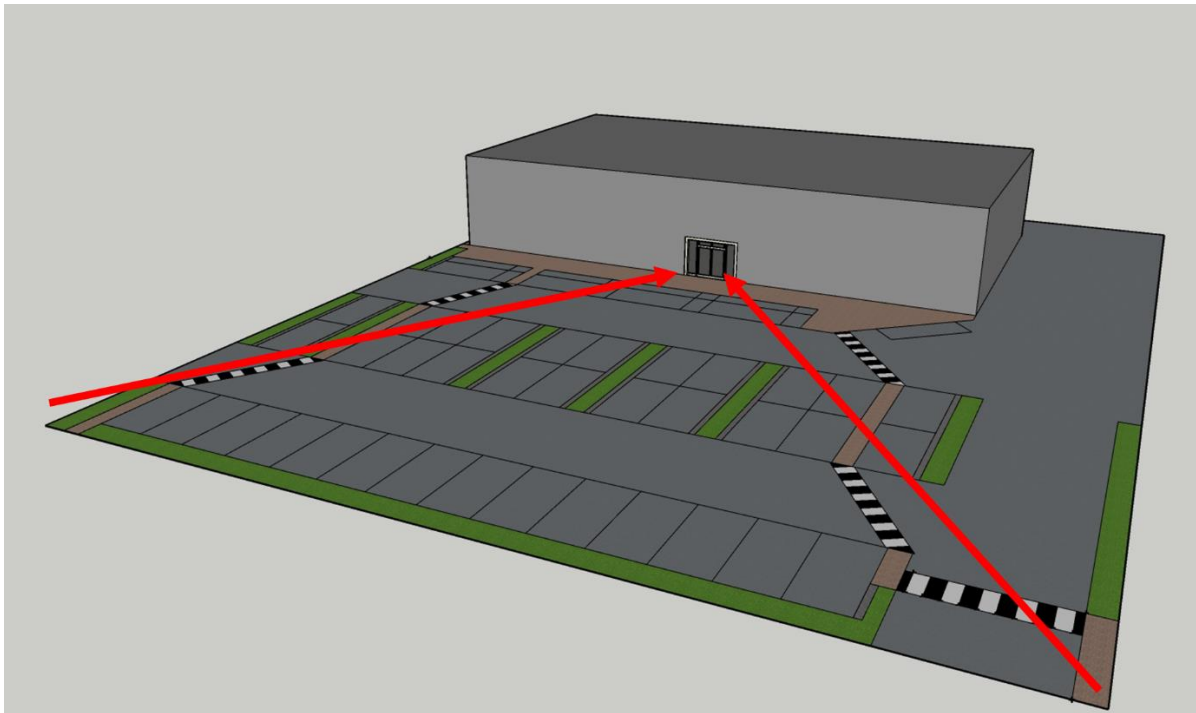
Fig. 7 Parallel parking minimum dimensions

- 5.12 The end of a parking space should not be directly adjacent to an openable window to a habitable room, or an openable window to a room used as office accommodation.
- 5.13 In addition, the spacing required will need to have regard to pedestrian access and specific issues relating to garages, considered below. Requirements for different types of motor vehicle other than cars and for cycle parking are considered separately in Chapter 6.

Provision for Pedestrian Movement

- 5.14 Pedestrians should be given priority over vehicles, as set out in Local Plan policy, the Framework and the Highway Code. This requirement applies within and around parking areas as elsewhere. The design of parking areas needs to include pedestrian-only safe routes through and around parking areas.
- 5.15 Pedestrians should be able to move around parking areas safely and easily. Provision for pedestrians will need to reflect desire lines, rather than providing segregated but circuitous routes. However, this should not be used as an excuse not to provide segregated routes on the assumption that pedestrians will just walk across the parking spaces and vehicle access routes. Such an approach is fundamentally unsafe for vulnerable users, especially small children, the frail elderly and people with a sight impairment.
- 5.16 The design of parking areas will therefore need to consider likely pedestrian desire lines, both in respect of pedestrians arriving from outside the site and walking towards the entrances, and in respect of people arriving in cars, and the movements they will make between where they will park and the entrances to the development. This should be an early consideration in determining the overall layout of the site, and the layout of the spaces.

Fig. 8 Provision for Pedestrians on Commercial Sites Example layout showing pedestrian routes reflecting desire lines. Trees and cycle stands are omitted for clarity.



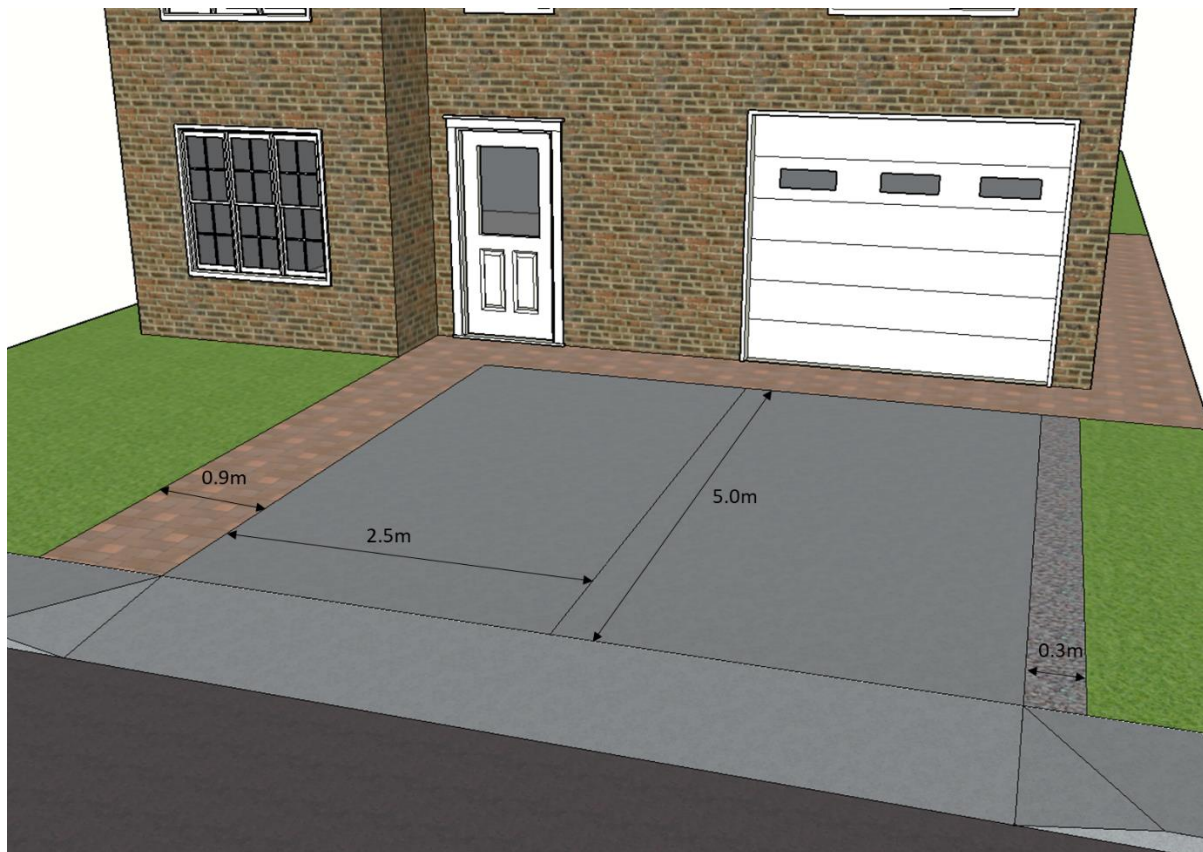
5.17 On commercial developments, the following principles should be followed:

- A segregated pedestrian path, of minimum width 0.9m (as required by the Building Regulations), should extend from the street edge of the curtilage to the main entrance, through any car parking area in between;
- The pedestrian route should be reasonably direct, and should not skirt the site perimeter;
- Where the frontage of the site is wider than 20m, there should normally be two such pedestrian routes, each extending from reasonably close to each end of the frontage;
- The pedestrian routes should adjoin parking spaces so as to provide a pedestrian route for the occupants of the vehicles to the main entrance;
- Where pedestrian routes cross access roadways through the parking area, they should be surfaced with zebra striping to show priority for pedestrians.

5.18 On individual residential dwellings, driveways should include sufficient space to allow for pedestrian access. The Building Regulations require a separate 0.9m wide pathway leading directly from the street footway to the main entrance door to be provided; this should use a surface material different from that used for the driveway. Lowered kerbs should not extend to include the area directly in front of the pedestrian pathway.

5.19 On individual residential dwellings, where the dwelling has a garage or a side gate providing access to the rear, a minimum of 0.9m width of additional hard surfacing, surfaced in the same materials as for the pedestrian pathway described above, should be provided in front of the dwelling and garage to allow access to the garage and/or rear access by pedestrians. Parking spaces should not include any of this area.

Fig. 9 Pedestrian Access Around Residential Parking Spaces



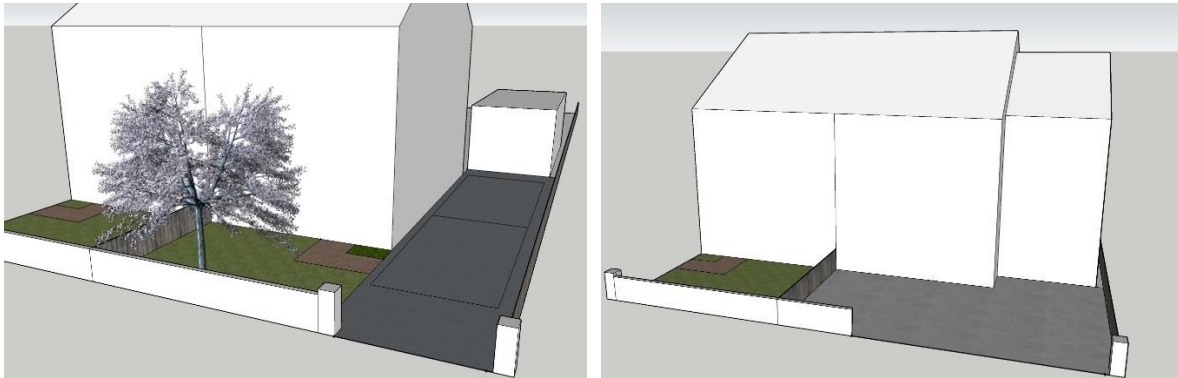
- 5.20 In the case of flats, 0.9m wide pathways into the car parking areas should be provided, with the approach to the rear doorway by a path, kept clear of vehicle encroachment by soft landscaping or bollards.

Alterations to Existing Residential Parking Arrangements

- 5.21 Existing residential dwellings may have generous, sufficient or inadequate parking. Proposed alterations to existing parking arrangements on an individual dwelling will be informed by the principles of good design as applied to the application site, and the parking standards. Local plan policy GD7 states that development should not normally result in the number of parking spaces on the site being reduced unless otherwise justified. A development proposal for an extension occupying an area formerly providing usable parking space, where this reduces the number of parking spaces below the standard, would need additional space *in lieu* provided. However, where this additional space would be harmful to character and appearance of the area, for instance where all soft landscaping were lost or the frontage became dominated by hardstanding, the Council will need to carefully consider whether the proposed development is acceptable and may lead to the refusal of the application.
- 5.22 Where the existing character of the area involves parking on-street, it will be appropriate to maintain this, as the alteration of front gardens piecemeal to accommodate vehicles leads to difficulties for the remaining vehicles attempting to use the constricted room remaining on the street between the new access points, and the loss of front gardens and their features is likely to cause harm to the character of the area. Where the Council has concern that this might occur, it will consider applying Article 4 directions where needed, on streets where

express permission is not needed currently. Where permission is required, in circumstances where the harmful effects described above would result, the application will be refused.

Fig.10: Unacceptable loss of front garden to parking. (Before and after views)



5.23 In dwellings constructed from the 1970s onwards, in general principle the original layout will have provided sufficient parking. Proposals to extend the areas devoted to parking, especially at the front of properties, including cases where this is proposed as part of a wider scheme to extend a property or convert a garage to habitable use, will be considered carefully as to whether the proposal will result in harm to the character and appearance of the area. In cases where the impacts are unacceptable, the application will be refused.

Garages

5.24 Garages are often provided on development sites with the intention that they will act as functional parking spaces. The Council will only consider garages to provide a functional car parking space where the design of the proposed development genuinely provides for them to be usable on a casual daily basis. Where a new garage is provided, whether on a new development site or within the curtilage of an existing dwelling, and is proposed to be counted within the required spaces for car parking, the following will be required:

- Minimum internal dimensions 6.4m x 3.0m for a single garage;
- Minimum internal dimensions 6.4m x 5.5m for a double garage;
- Any door at the side intended to open inwards will need to be at least 5m from the garage door (measured internally);
- Where a parking space is to be provided in front of the garage, a buffer of 0.9m will be required between the garage and the space, where this provides the most direct route between the main pedestrian access route and the rear of the property;
- Doorway width for a single garage to be a minimum of 2.5m
- Doorway width for a double garage to be a minimum of 5m. Where two individual doors are to be fitted, they should each be a minimum 2.5m wide.

5.25 Electric vehicle charging infrastructure in garages will normally be provided by a wall-mounted box. Dimensions of typical boxes are generally less than 500mm (height) x 300mm (width) x 150mm (depth) meaning that, providing that a sufficient power supply can reach the garage, charger boxes need not encroach significantly on the available space for the vehicle, where the garage dimensions are sufficient, in line with the requirements above.

Fig. 11: Single Garage Dimensions

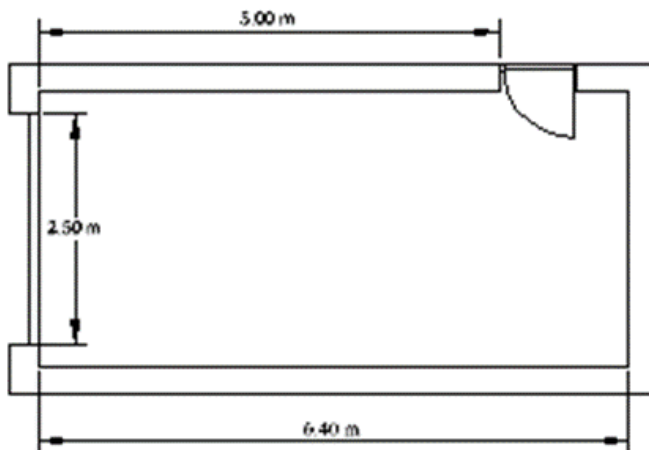
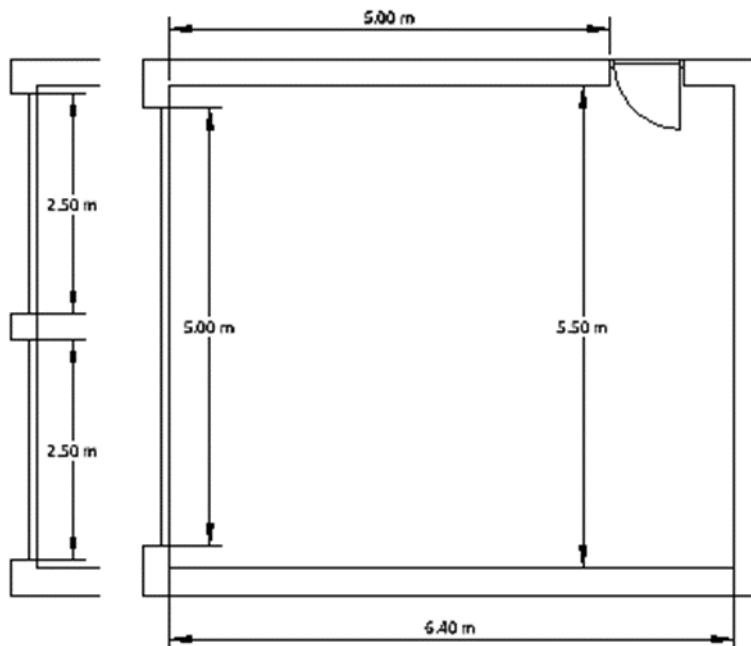


Fig.12: Double Garage Dimensions



- 5.26 Where a garage is intended to function for other purposes in addition to car storage, for instance to provide storage space for a workbench, toolboxes etc or to provide a utility area for washing machines and dryers or a boot room function, the dimensions will need to be increased to provide for the additional functionality, so that 6.4m x 3.0m remains clear for the vehicle and clearances around it.
- 5.27 A garage of the size described above is considered to allow for bicycles and bins to be brought in and through, as well as providing a parking space, if no other access to the rear of a property is available. Clearance of 0.6m is needed for the handlebars of a cycle to pass; the same width is needed for bins to be wheeled past; this may require the vehicle to be parked slightly to one side (which is usual anyway, to allow the driver to exit. Normally an external door at the rear of the garage (that does not require access through habitable accommodation) will be

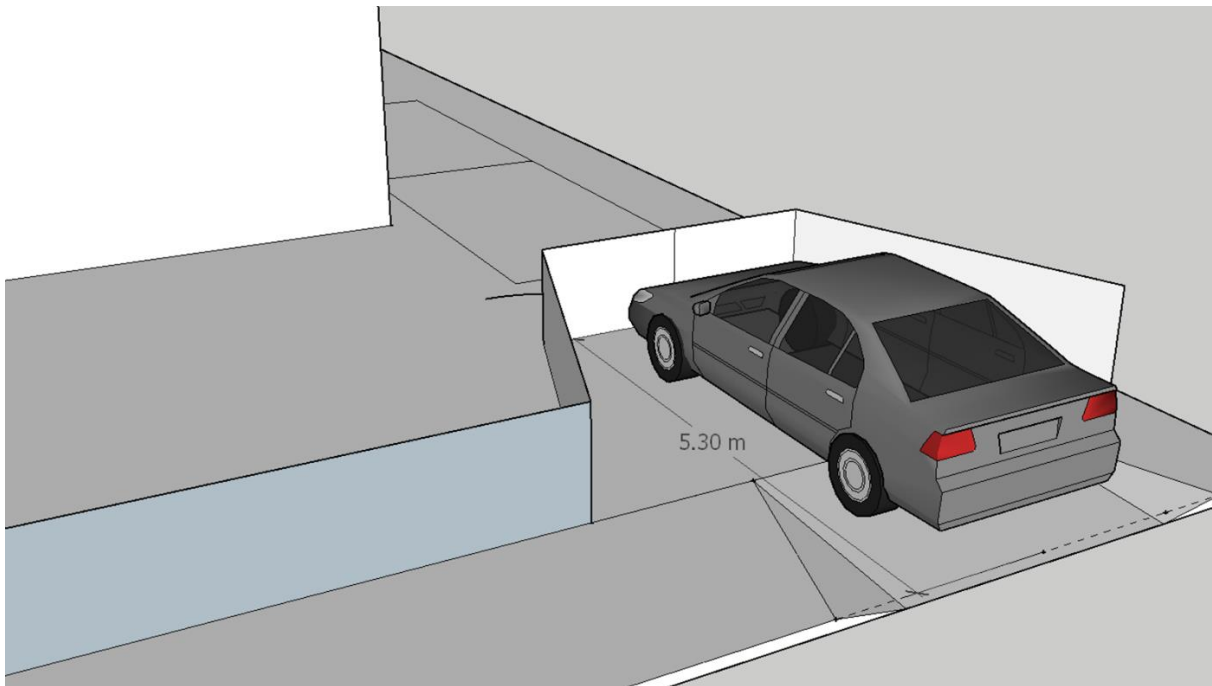
required to allow rear access and allow for cycle storage in a shed. Normally, a garage of 6.4m x 3.0m will provide storage for a car and bicycles.

- 5.28 There are circumstances where a garage provides a functional parking space for a residential property, as a fundamental part of the initial layout of a residential area that ensures good design is not compromised by a surfeit of visible parking and excessive areas of hardstanding. In such circumstances, the creation of additional hardstanding would be harmful to the amenity of the area through fundamentally poor design.
- 5.29 In such cases, restriction of permitted development rights to create additional hardstanding will be appropriate, through condition on the application for reserved matters or full approval. In addition, restriction of permitted development rights, to prevent the change of use of the garage to habitable accommodation, will also be appropriate.
- 5.30 Where an existing garage is attached or integral to a dwelling, but is of sub-standard dimensions, it is still capable of providing storage for a small car, motorcycle or cycles. Where permitted development rights have been removed to retain the garage for the storage of vehicles and prevent conversion to habitable accommodation, the Council will apply a presumption against granting planning permission for conversion, unless it can be demonstrated that sufficient parking spaces excluding the garage (based on the standards in Table 2) were provided in the original layout, without the extension of the area of hardstanding. In such cases, permission may still be refused for conversion of the garage if access for cycle and motorcycle storage and waste disposal to and from the rear of the dwelling would be obstructed by the conversion (i.e. by “walling in” the rear of the property).
- 5.31 Where an extension is proposed to an existing dwelling, it should be assessed for its impact on the provision of parking spaces, including impact on pedestrian access routes to the dwelling. Local plan policy states that the number of parking spaces on a site should not be reduced unless material considerations indicate an exception. The number of parking spaces should not be reduced below that set out in the standard in Table 2, in any case. Any proposed extension should not require the creation of extensive areas of hardstanding at the front of the property (*in lieu* of lost spaces), or the widening of the access at the front, that would be harmful to the character and appearance of the dwelling and the area. In addition, manoeuvring space should not be compromised (see below). Where proposals for extensions would result in harm to visual amenity, local character or highway safety for these reasons, the application will be refused.

Gates

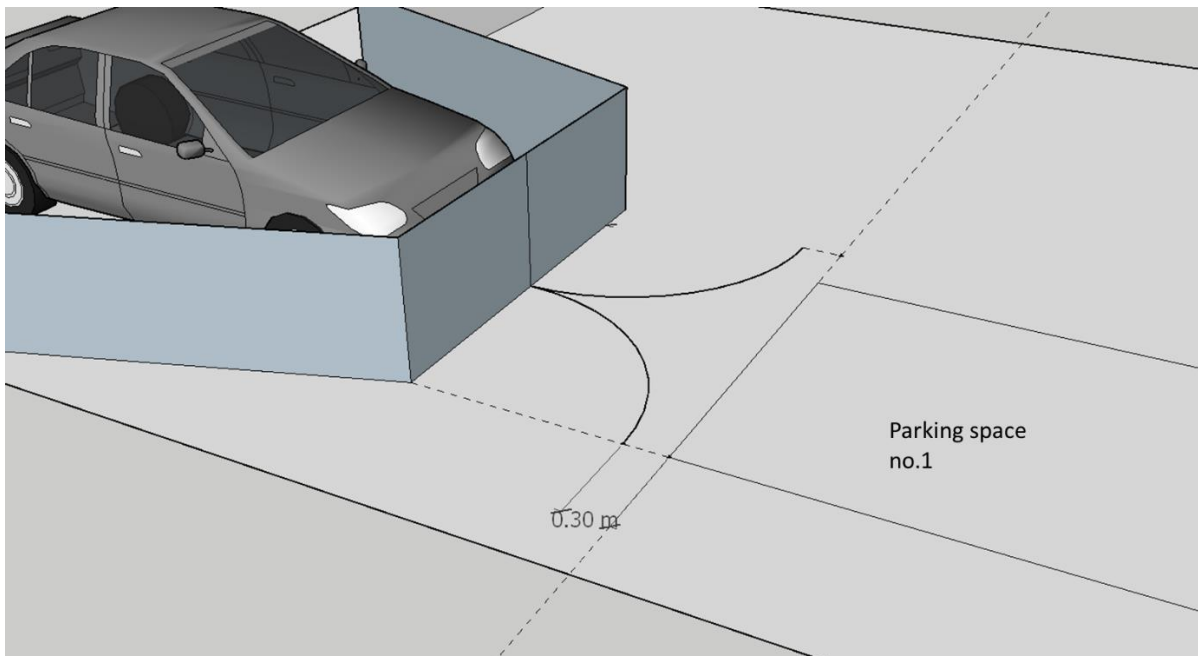
- 5.32 Manually-operated gates, and some types of automatically-operated gates, have the effect of lessening the effective area available for parking. They can also result in the obstruction of traffic on the highway when vehicles are entering and exiting parking areas. Therefore, where gates are proposed, either as part of new or existing developments, the following principles will need to be applied:
- With the gates closed, there must remain a length of 5.3 metres from the edge of the carriageway to the closed gate position, so that vehicles do not stand stationary obstructing the carriageway whilst the gates are being opened or closed. However, this requirement will be waived if gates that open and close automatically by remote control from the vehicle are to be installed (which will be secured by planning condition in circumstances where necessary).

Fig. 13 Setting back of non-automated gates



- Where gates open and close on hinges, any area to be considered to provide parking will be set back from the entrance by the radius of the swing plus 0.3m.

Fig. 14 Allowance for gate swing



Manoeuvring, access routes and operational parking

5.33 Although the precise situation of an individual layout will affect how vehicles move within parking areas, this section provides guidance on manoeuvring space required as a starting point to assist applicants in drawing up schemes.

- 5.34 On unclassified roads and in new residential layouts, it will normally be acceptable for the parking spaces for individual dwellings to exit directly onto the roadway, with the roadway providing any manoeuvring space.
- 5.35 Outside the settlement boundaries set out on the Local Plan Policies Map, and on any classified road within the settlements, all new developments will be required to provide the means to ensure that all vehicles that will be used in association with the development are able to enter and leave the site in forward gear. On commercial sites this will need the routing of large vehicles to be clearly indicated, with Transport Statements or Transport Assessments including swept path analysis where necessary. For residential sites, a simple diagram showing the geometry should suffice. Any proposal for an extension to an existing dwelling or for additional development on a commercial site should not compromise areas required to provide for vehicles to turn in order that they can enter and leave in forward gear.
- 5.36 Where residential developments provide communal parking areas, such as on developments of flats, and on commercial developments and community uses with parking areas to be provided within the curtilage, parking areas will need to allow at least 6.0 metres of space between rows, where the spaces are perpendicular to the access route. Where the access route meets a dead end, the access route will need to extend at least 1.3 metres beyond the final spaces, to allow for vehicles to manoeuvre into and out of the end spaces.
- 5.37 Reductions in access route width can be made possible by setting the parking spaces obliquely to the access route. Where spaces are set 45° from the perpendicular, access route width may be reduced to 3m.
- 5.38 Operational and service parking can form a critical element of the design of a scheme, which can render a development proposal unacceptable if badly considered. This will include parking for vehicles delivering or despatching goods, and otherwise servicing of the premises including waste collection, removals, taxis and waiting spaces for vehicles picking up visitors/customers.
- 5.39 In rural areas any operational space should utilise existing developed hardstanding wherever possible and should not normally result in the extension of the site onto greenfield areas.
- 5.40 Within the existing developed areas in the towns and local service centres where commercial development is found, whether in the town centre or not, it is recognised that servicing will make use of streets for manoeuvring, and in some cases for loading/unloading. Local plan policy presumes the retention of employment premises in employment use; the Council will not compromise this by making unreasonable requirements for access and operational parking on new commercial users of existing commercial premises, or premises returning to commercial use, in such areas.
- 5.41 Where new larger-scale commercial development is proposed, the presumption will be that servicing and operational space will be provided within the development site. This will need to include provision for vehicles of any size that will be based at or visit the site to enter and leave the site in forward gear. It will often be necessary for this to be illustrated by swept path analysis. The advice provided by the HSE on its website⁴ may be useful in devising a scheme. Transport statements or transport assessments accompanying such applications will need to

⁴ <https://www.hse.gov.uk/workplacetransport/vehiclehandling.htm> , in particular the three diagrams showing possible turning arrangements for articulated vehicles.

set out working arrangements proposed for the site including parking for all types of vehicles involved, and demonstrate that the layout put forward is satisfactory.

- 5.42 Leisure, health and larger scale retail developments should include pick up / drop-off zones close to the main entrance, that can be used by taxis and private vehicles.

Landscaping and Materials

- 5.43 Good design requires parking to be well-landscaped and sensitively integrated into the built form, incorporating green infrastructure including trees to soften the visual impact of vehicles, help improve air quality and contribute to biodiversity.
- 5.44 The design of the parking area should be informed by and reflect from the very outset the overall landscaping strategy for the whole development site and should result in a coherent whole development approach. The landscaping strategy for the site will in turn have reflected the external context to the site at least at a street and neighbourhood level.
- 5.45 In areas of historic environment, particularly within and around the Borough’s Conservation Areas and within the curtilage and setting of Listed Buildings, the use of paint to mark out parking spaces will not normally be accepted. Alternative solutions that will enhance, rather than detract from, the historic setting will be required: this might involve the use of studs, for example.
- 5.46 On residential sites where significant numbers of vehicles need to be accommodated on limited space, there will be an expectation that parking spaces will be interrupted by areas of soft landscaping of trees and shrubs growing to approximately 1 metre in height, in order to reduce the visual impact of the parking area. These soft landscaped areas should be at least 1 metre wide, and set so that there are no more than two parking spaces between such soft landscaping spaces, as illustrated below.

Figure 15: Landscaping of Limited Spaces



- 5.47 On all new commercial sites, and any other newly laid out non-domestic parking areas (including health, education, municipal, government, defence establishments), landscaping will normally be required to involve the use of trees, with the scheme designed to provide as great a degree of shading (when mature) as can reasonably be achieved to the whole parking

area in order to avoid the heating effect from solar radiation on surfaces and vehicles. As a general benchmark, using smaller ornamental tree species, this would require one standard tree per two car parking spaces over larger parking areas.

- 5.48 On all sites, use of soft landscaping along margins and within the car parking areas will be required, in such a way to ensure that the overall appearance is attractive and that cars will not be visually prominent within the overall street scene from all main internal and external vantage points. The Council will expect sufficient space dedicated to soft landscaping within the overall parking area that will achieve this.
- 5.49 Fylde is a low-lying Borough and consequently surface water runoff from extensive paved surfaces can result in flooding, either on the site or downstream. In accordance with Local Plan Policy CL2, the Council will therefore require that **all** newly-laid parking areas are constructed using pervious paving, as described in paragraphs 2.9 to 2.13 of Approved Document H⁵ of the Building Regulations, unless the applicant can demonstrate to the satisfaction of the Council and Lead Local Flood Authority that this is not possible. Where not possible, the Council will require the incorporation of alternative mitigation techniques such as rain gardens, soakaways and swales. Further guidance on sustainable drainage can be found in the Council's Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) Supplementary Planning Document.
- 5.50 Maintenance of the agreed scheme will be essential. The Council may impose planning conditions to require the upkeep of landscaping, cleaning of surfaces and emptying of oil traps.

Lighting and security

- 5.51 On commercial sites and others with visitors or more than five employees (including education, health, defence, the prison), provision of good quality lighting providing complete coverage of the parking area is essential. The design of the lighting scheme should specifically highlight pedestrian routes through the provision of specific lighting to those routes, rather than coverage of these just being incidental to the overall lighting scheme.
- 5.52 Natural surveillance should be maintained as far as possible, without compromising the provision of soft landscaping and tree shading. In some cases, the use of CCTV may be the most appropriate method of providing surveillance to ensure that Secured by Design principles are followed in accordance with Local Plan policy. In the case of cycle parking, the location should maximise natural surveillance, but where there is nowhere constantly observed, CCTV will be essential.

Signage

- 5.53 Signage must be provided at the entrance to the development to clearly indicate the location of and route to access the parking for cars, and separately for cycles (and motorcycles if appropriate).
- 5.54 For large car parks (over 50 spaces) that will be utilised by the public, signage should be provided on main routes leading to the site in liaison with the Highways Authority, or National Highways with respect to trunk roads.

⁵ <https://www.gov.uk/government/publications/drainage-and-waste-disposal-approved-document-h>

6. Parking for Cycles and Other Vehicles

- 6.1 This section sets out requirements for the parking of cycles, motorcycles, vehicles used by disabled people, mobility scooters, lorries and coaches.
- 6.2 Local Plan and national policy support encouragement of increased cycle use. The Government's Gear Change strategy aims to make half of all journeys in towns and cities on foot or by cycle by 2030. Further development towards the achievement of a continuous coastal cycle route from Fleetwood and Blackpool to Lytham and on to Preston, as set out in the Local Plan, is likely to result in increased cycle use in the Borough. The programme of Lancashire Cycling and Walking Infrastructure Plans will provide a boost for infrastructure provision for cycling and walking. Therefore, it is important that new developments provide sufficient cycle parking not just based on existing usage levels but also to allow for and promote significant growth.
- 6.3 The Department for Transport's document Cycle Infrastructure Design⁶ principally deals with street infrastructure such as cycle lanes but in its Chapter 11 provides guidance on the design of cycle parking areas and provides national minima for cycle parking. However, in view of the objectives of the government's Gear Change strategy to fundamentally increase cycling and walking, this SPD includes local standards as allowed for in the guidance. The Council's requirements are set out in the following sections.

Cycle Storage for Residential Dwellings

- 6.4 For residential dwellings, cycle storage will be required, rather than parking. Space will be required for one cycle for one-bedroom properties, two cycles for two- or more bedroom properties. This need not be a bespoke facility specifically for cycle storage. Sufficient space within a garage (that does not compromise the space needed to accommodate a car, where this is needed to comply with the parking standards) is often suitable: the requirements for the size of a garage for sufficient space to provide for a car and cycles is set out in Chapter 5. Where a garage is provided that is substandard such that it is unlikely to be used for a car, it will nonetheless be satisfactory provision for cycle storage. Where a dwelling has an external access route to a rear curtilage, space within the curtilage to provide a shed (whilst leaving sufficient external amenity space as required by Local Plan policy) will be sufficient.
- 6.5 It will not be considered acceptable for cycle storage to be assumed to be within habitable space within the dwelling; neither should it be assumed that a bicycle should be carried up or down steps. In new flat developments, ideally cycle storage will be internal to the building within a ground floor area close to the entrance; however in conversions from traditional buildings an external storage facility will often be needed. For flat developments, the Council will require provision of the chosen cycle storage facility to be included as part of the planning application and its provision will be secured through a planning condition.
- 6.6 The design of residential properties can cause a barrier to cycle use. This is particularly likely where extensions are added to existing dwellings which seal the rear curtilage of the dwelling and prevent access to it other than through the front door. This can occur through side

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/951074/cycle-infrastructure-design-ltn-1-20.pdf

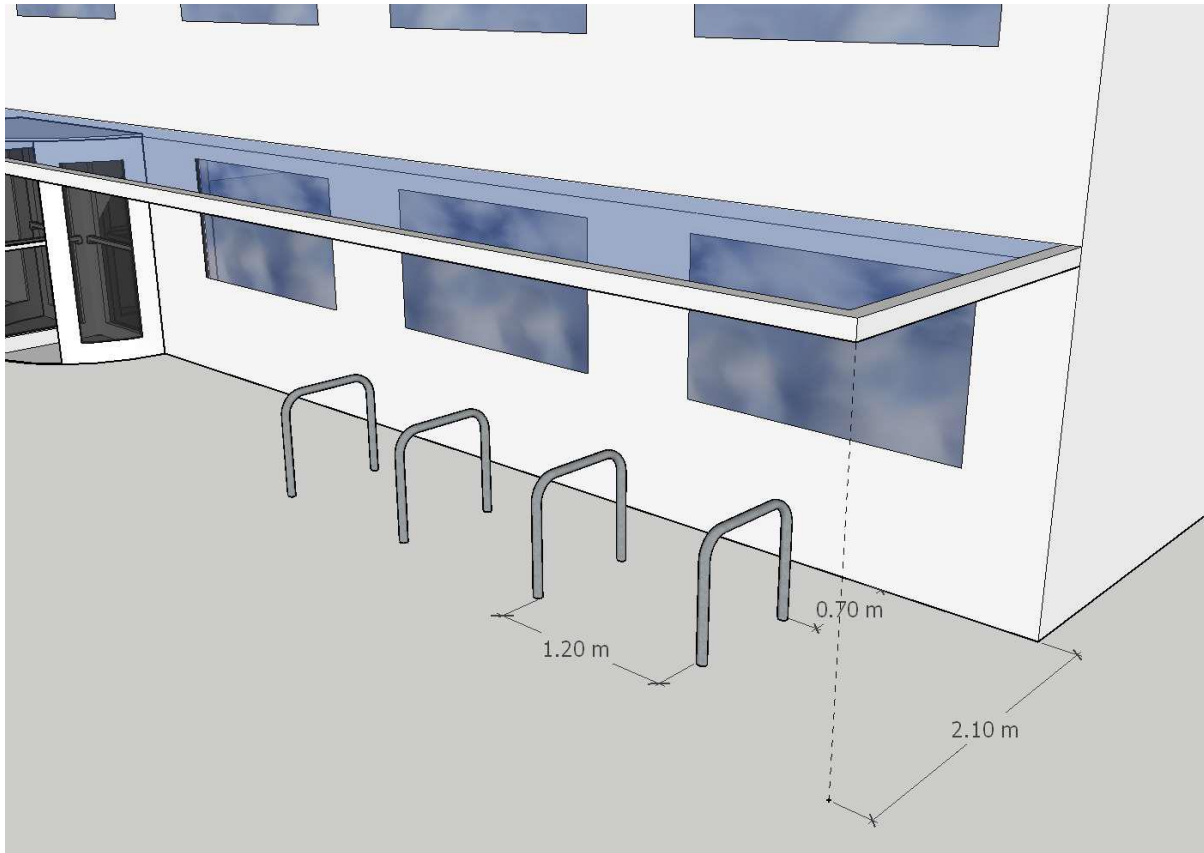
extensions or garage conversions into habitable accommodation. Many such cases occur under permitted development rights. However, where side extensions or garage conversions require planning permission, they will only be permitted where access to either a garage or to the rear of the property externally is maintained.

- 6.7 The Council will ensure that the availability of cycle storage is available to occupants for the lifetime of a development. Therefore, where there is the possibility that a new dwelling could be extended to the side at a later date, in a way that would obstruct any access to the rear for cycle storage (without providing it through a garage), or would result in the conversion of a garage that provides for cycle storage, the Council will consider imposing planning conditions withdrawing permitted development rights accordingly where required.

Cycle Parking on Commercial and Community Developments

- 6.8 Census data from 2011 shows that the numbers cycling to work were between 5-10% of the numbers driving to work, varying between different small areas. The amount of cycle parking required on commercial developments therefore needs to exceed this rate, in order to ensure existing demand is not constrained, and provide for its significant growth in the future. To ensure that this need is met, the Council will require one cycle parking stand for every five car parking spaces required by the standards set out in Table 2. Where the number of car spaces required is not divisible by five, a further cycle stand will be required in lieu of the remainder; i.e. where 22 car spaces are required, five cycle stands will be needed. Where the number of car parking spaces actually provided is lower than the standard due to Travel Planning, or being otherwise considered acceptable by the Council, the number of cycle stands should still be based on the basic requirement in the standard in Table 2.
- 6.9 Cycle parking for employees will be required to be under cover. The standard requirement is for the use of "Sheffield stands" which are tubular metal stands, fixed to the ground at two points; alternatives will be considered at the Council's discretion, but will need to achieve the same degree of security (allowing two-point locking).
- 6.10 The required spacing between stands is 1.2m, with 0.7m spacing between the stands and any wall/fence/part of the shelter/other obstruction. If more than one row of stands is needed, the rows should have 3.0 metres of space between them. It is not considered that the use of unconventional designs of cycle stand or storage, such as those involving tilting cycles at an angle, or in tiered racks, should be necessary in Fylde.

Fig. 16 Cycle parking spacing. Example shows cover provided by use of canopy integrated into the design of the building



- 6.11 In town centre locations, cycle parking should be provided within the rear servicing areas where such an area exists for the premises, and should be a secure lockable building or enclosure, under cover.
- 6.12 Outside of town centre locations, and where the provision is principally for customers (such as convenience retail or leisure facilities, the Council will require that cycle parking is located directly adjacent to (or directly opposite and within 8m from) the main entrance to the building, in a location that maximises natural surveillance.
- 6.13 On developments where 10 or more cycle stands are to be provided, the Council will require the development to include provision for changing and showering facilities for staff.
- 6.14 Planning conditions will be imposed to require that the requirements noted above are implemented before a development is brought into use (generally as part of a similar condition for the wider parking area) and thereafter retained.

Motorcycle parking

- 6.15 In residential developments, prevailing rates of motorcycle ownership means specific provision is not necessary. A sufficient proportion of developments include garages, which can provide for a motorcycle; otherwise, access to the private area of the curtilage will allow for a small bespoke building to be added in many cases. Providing that private outside space is accessible other than through the dwelling (i.e. it is not walled in) (as also necessary for cycles and mobility scooters), this will ensure that residents of new houses will be able to keep motorcycles.

- 6.16 In the case of newly-built flats, motorcycles would normally be kept in the allocated car parking spaces. Ideally, for a motorcycle this would include a post or railing, against which to lock the motorcycle; however given the relatively small numbers it is not justified to require this on all such spaces. In most cases, the subsequent installation of a post or wall-mounted rail would be possible to provide for a motorcycle on an individual space. Therefore, no specific provision is required of developers at the outset.
- 6.17 For commercial uses, in many circumstances bespoke motorcycle parking will not be required as standard car parking spaces will provide for the small numbers of motorcycles. However, there are situations where motorcycles may need to be specifically provided for. Where there are significant numbers of employees or visitors overall, it may be advantageous to developers, and desirable, for motorcycle spaces to be grouped together, as this will achieve a significant space saving.
- 6.18 Where spaces specifically allocated for motorcycles are provided, spaces should be provided with anchorage points or a rail, ideally 60 cm from the ground, to which the motorcycles can be secured. Such spaces should be in a well-lit area with constant natural surveillance easily visible from the entrance to the premises.
- 6.19 Where long-stay motorcycle parking (over 4 hours) is to be provided, it should be in a secure covered structure that may be shared with cycles.

Vehicles used by Disabled People

- 6.20 Car parks will need to provide for disabled users, in line with the requirements of the Equality Act. Parking spaces for disabled users (laid out in accordance with the dimensions in Chapter 5) will be required as follows:
- For commercial uses where parking is principally for visiting users, i.e. retail, leisure and recreation facilities, and for places open to the general public, one space in every 10 spaces provided in total should be a space for disabled users.
 - For commercial uses where parking is principally for employees, i.e. offices, research and development, industrial and storage/distribution, one space in every 20 spaces provided should be a space for disabled users.

Mobility scooters

- 6.21 One of the most significant features of Fylde that needs to be planned for is the ageing population. The Local Plan indicates that all of the population increase in the Borough between 2011 and 2030 is made up of people of 65 and over; the numbers with a mobility impairment will increase substantially.
- 6.22 It is important that users of mobility scooters are able to access facilities. Users of mobility scooters are unable to walk more than a short distance and therefore it is important that users are able to leave their vehicles as close as possible to the entrance, in a place that is secure.
- 6.23 In residential developments, there will be a need to ensure that there is at least the potential for the storage of mobility scooters in a secure building, or within a secure part of the curtilage under cover, such as a car port. Level access will be required to a private area of the property in order for this to be achievable. Alternatively, if a mobility scooter is to be stored within the dwelling, the current building regulations require all dwellings to be “visitable dwellings”: these measures are designed for a wheelchair user, but would be sufficient for a small mobility

scooter which would be able to turn within the dwelling. Therefore, on smaller dwellings it will be necessary (as with cycle parking) to ensure there is step-free external access to the private areas of the property, whilst with larger dwellings step-free access into the dwelling as provided by building regulations will be sufficient.

- 6.24 With commercial developments, for visitors/clients sufficient space to park a mobility scooter on the forecourt close to the entrance in a location highly publicly visible (similar to any cycle parking) will suffice in most circumstances. This does not need to be marked; there simply needs to be sufficient space. Special arrangements will be needed where the internal area of the development is large, as mobility scooter users would need to be provided with suitable assistance for within the building; however this falls under disability legislation and does not need to be covered by planning control.

Parking for lorries and other commercial vehicles

- 6.25 It is essential that the layout of commercial developments provides for the needs of the vehicles that will either operate from or service the premises, whatever form these take.
- 6.26 Dependent on the circumstances of the application and the nature and purpose of vehicle movements, it may be appropriate to consider lorry/commercial vehicle parking as servicing, or as operational parking, or as a combination of both.
- 6.27 Applicants will be required to set out how any proposed arrangement will work within the Transport Assessment or Transport Statement.

Coach parking

- 6.28 Fylde is an important leisure destination and has a significant number and wide range of visitor-based leisure uses such as stadia, hotels and holiday parks. Applications for new such uses, or alterations to existing uses, may require provision of coach parking for the facility. The parking standards in Table 2 in Chapter 4 highlight the specific cases where these will be needed.
- 6.29 Off-site provision can be accepted within certain established tourist areas, where the use of land within a development site for coach parking would represent inefficient use of land. In particular, developments on St Annes promenade and on Clifton Drive within the designated town centre of St Annes will only need to provide an arrangement for coach drop off and pick up, to be set out within the Transport Assessment or Transport Statement.

7. Electric Vehicle Charging

- 7.1 The Local Plan and national policy stress the need to provide electric vehicle charging infrastructure, to allow for the phasing out of petrol and diesel vehicles. This section provides guidance on how the necessary infrastructure can be provided for new developments.
- 7.2 Approved Document S⁷ of the Building Regulations sets out requirements for the number of charging points that need to be included on a development site, including changes of use. Planning policy should not duplicate other areas of legislation; however, there are implications arising from the Building Regulations requirements that will need to be considered to ensure that a development granted planning permission can subsequently be constructed.

Permitted development rights

- 7.3 In certain circumstances, planning permission is not required for the installation of electric vehicle charging points. The Town and Country Planning (General Permitted Development (England) Order 2015 (as amended), Schedule 2 Part 2 Minor Operations gives permitted development rights for certain facilities for electric vehicle charging. Class D of Part 2 allows *“The installation, alteration or replacement, within an area lawfully used for off-street parking, of an electrical outlet mounted on a wall for recharging electric vehicles”* providing that the outlet and casing would not exceed 0.2m³, face onto and be within 2m of a highway, be within a site designated as a scheduled monument or be within the curtilage of a listed building.
- 7.4 Class E of Part 2 allows *“The installation, alteration or replacement, within an area lawfully used for off-street parking, of an upstand with an electrical outlet mounted on it for recharging electric vehicles”* providing that it is within the curtilage of a dwellinghouse or flats, it does not exceed 1.6m in height, or in any other case it would not exceed 2.3m in height, it would not be within 2m of a highway, would not be within the curtilage of a listed building and would not result in more than one upstand for each parking space.
- 7.5 Therefore, it is possible without express planning permission to install charging points to most dwellings that have off-street parking.

Commercial developments

- 7.6 The Building Regulations require new non-residential buildings which have 10 or more parking spaces to include one charging point, together with sufficient cable routes installed to allow for one fifth of the remaining spaces.
- 7.7 In most cases, cars visiting commercial premises will be charged domestically. Charging points for commercial businesses will therefore be needed principally for top-up situations, where visitors to the premises have travelled further than locally. Chargers provided at commercial premises could also be used by members of the workforce who would otherwise have to depend on on-street chargers which may not always be available. The number of vehicles which may require charging at commercial premises will increase as the proportion of electric vehicles increases. Where it is proposed to include larger numbers of charging points or cable

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1057375/AD_S.pdf

routing than required by Building Regulations, the Council will accept this where the development is acceptable in all other respects.

- 7.8 At present, charging for commercial vehicles will usually be limited to smaller vehicles undertaking “last-mile” elements of distribution or for local tradespeople (the latter often charging vans domestically). It is not considered appropriate for the SPD to be prescriptive on charging facilities for such vehicles. Where a development is otherwise acceptable and requires charging facilities for commercial vehicles, the provision of charging will be supported; the Council will require this to be undertaken on-site, and sufficient suitable parking spaces provided to achieve it.

Service areas on major routes

- 7.9 National policy supports the roll-out of charging infrastructure at service areas on major routes. There are no motorway service areas within the Borough at present. Minor service areas on the A585 Trunk Road are found at Esprick and Four Lane Ends (Singleton). Provision of charging infrastructure on these established service areas on this major route may be brought forward, subject to compliance with other relevant policies of the Local Plan.

Residential sites

- 7.10 The Building Regulations require new residential dwellings with “associated parking” to “have access to” a charging point for each dwelling, or in a development with fewer parking spaces than dwellings, a charging point for each parking space. In addition, cable routes are required to serve additional spaces in flat developments with more than 10 spaces.
- 7.11 Electric vehicle charging can usually be achieved direct from the dwelling. This highlights the importance of the position of parking in relation to the dwelling, the likely source point of the electricity supply to the cable and the need to design out trip hazards.
- 7.12 As noted in Chapter 5, typical wall-mounted boxes generally measure less than 500mm (height) x 300mm (width) x 150mm (depth). Providing that either a side wall or a garage is available, an installation can usually be included without encroachment on necessary parking areas or detriment to the design of the dwelling. Plans for dwellings on new development sites will need to indicate the location of the charging point in order to demonstrate that:
- The location of the charging point is suitable: in general, the Council will not accept charging points attached to the front elevation of a dwelling;
 - The location and layout of parking spaces in relation to the charging points is suitable. In particular this will mean that the route on which the cable is likely to lay during charging will not cross the principal pedestrian access routes to the dwelling.

On-street EV charging

- 7.13 National policy supports major increases in provision of on-street electric vehicle charging points. Lancashire County Council (LCC) is developing approaches as to how this can be achieved in practice, having regard to existing street furniture such as street lighting (at present the standard siting of street lighting columns is at the property edge of the footway rather than the road edge, which poses difficulties in utilising these to provide charging infrastructure). The Council will support the LCC’s efforts.
- 7.14 Development proposals that rely on on-street parking to meet parking needs may be required by the Council to contribute to the installation of on-street electric vehicle charging points.

8. Travel Plans, Transport Assessments and Transport Statements

- 8.1 National planning policy and PPG set out the role of Travel Plans, Transport Assessments and Transport Statements in supporting planning applications (as described in Chapter 2). This SPD will explore how developers should apply the national guidance in the context of Fylde.
- 8.2 The PPG states that a Travel Plan will be needed when “significant amounts of movement” results from the development, which should be assessed on a case-by-case basis. Whether a transport assessment is required in support of an application will depend on the level of information needed by the Highway Authority to provide a conclusive view on the acceptability of the application. Applicants for large developments are advised to seek pre-application advice from the highway authority, which will help determine the level of information needed.
- 8.3 However the following table provides an indication of when Transport Assessments and Travel Plans will be required:

Table 3: Applications requiring Travel Plans, Transport Assessments and Transport Statements

Proposed use	Transport Assessment and Travel Plan required for development larger than shown below	Transport Statement required for development of the sizes shown below
Class F2/E Food Retail	800 m ² Gross Floor Area (GFA)	Between 250m ² and 800m ² GFA
Class E Non Food Retail	1,500 m ² GFA	Between 800m ² and 1,500m ² GFA
Class E Financial and Professional Services (not medical)	2,500 m ² GFA	Between 1,000m ² and 2,500m ² GFA
Class E café or restaurant	2,500 m ² GFA	Between 300m ² and 2,500m ² GFA
Class E Offices	2,500 m ² GFA	Between 1,500m ² and 2,500m ² GFA
Class E Light Industry, Research and Development	2,500 m ² GFA	Between 1,500m ² and 2,500m ² GFA
Class B2 Industrial	4,000 m ² GFA	Between 2,500m ² and 4,000m ² GFA
Class B8 Storage and Distribution	5,000 m ² GFA	Between 3,000m ² and 5,000m ² GFA
Class C1 Hotels, motels, boarding and guest houses	100 bedrooms	Between 75 and 100 bedrooms

Class C2 Hospitals and nursing homes	50 beds	Between 30 and 50 beds
Class C2 Residential colleges, residential training centres, residential schools	150 students	Between 50 and 150 students
Class C3 Dwelling Houses	80 dwellings	Between 50 and 80 dwellings
Class F1 Schools, museums, public libraries, public halls, exhibition halls, places of worship, law courts	1,000 m ² GFA	Between 500m ² and 1,000m ² GFA
Class F2 Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms, community halls and meeting places	1,500 m ² GFA	Between 500m ² and 1,500m ²
Class E Indoor sport and recreation	1,500 m ² GFA	Between 500m ² and 1,500m ²
Cinemas, theatres, amusement centres, concert halls, bingo halls, dance halls, nightclubs, public houses (<i>sui generis</i>)	1,500 m ² GFA	Between 500m ² and 1,500m ²

Travel Plans

- 8.4 Travel Plans are required of all developments that generate significant amounts of transport movement. An indication of when this is likely to apply is set out in Table 3 above. The role of Travel Plans is to set out measures that encourage the use of sustainable transport options, particularly active travel options, in order to lessen the impact of the development on the local highway network, including to reduce pressure on parking provision. They should be considered in parallel to development proposals and integrated into the design and operation of the new site, rather than being a series of measures retrofitted to a completed development.
- 8.5 Development proposals may include measures that result in a reduced need for parking on the site, or for any adverse effects of parking on sites to be reduced or eliminated. The effects of any development proposal are considered net of any such mitigation measures provided. In assessing any development proposal, the measures put forward as mitigation will need to be over and above the standard requirements of policy for the prioritisation of sustainable transport modes and active travel. For instance, cycle racks or sheds should not be considered as mitigation, but as a basic requirement on all sites. Furthermore, mitigation measures must be actual mitigation for effects, not contributions to provide funding for workplace co-ordinators or council officers to monitor whether mitigation is needed or successful.
- 8.6 The Council will seek mitigation measures that promote choice of travel modes in line with national and Local Plan policy. The appropriate measures are likely to differ between

workplace travel plans, and those concerned with commercial units with large numbers of customers or clients. Typical measures could include:

- Contributions towards higher frequencies of bus services or additional routes;
- Off-site contributions towards the creation of cycle routes linking to the development within surrounding areas
- The provision of works transport for employees
- All tickets to use the facility to include travel by public transport from the purchasers' home address within a certain distance
- Provision of public transport vouchers/passes/season tickets to employees
- Operation of cycle-to-work schemes through, for instance, the provision of subsidised cycle purchase
- Measures to provide for a shared vehicle scheme in which residents would be required to participate
- Measures to require employees to use shared company vehicles
- Provision of on-street publicly-available electric vehicle charging points
- A requirement for a certain proportion of staff to car share, including the operation of a register
- Provision for the introduction of a residents parking scheme that would prevent employees from parking nearby off-site
- Measures to prioritise the use of parking within the site for visitors and clients rather than employees
- Agreements to restrict the employment of those beyond walking distance in certain roles
- Agreements with owners of neighbouring sites to jointly use parking, where it is needed at different times of the day or week by each, or to provide for public use of parking when not required by the business and locally beneficial.
- Measures to provide for loading and servicing jointly with neighbouring premises or otherwise off-site

8.7 Mitigation measures may allow for a reduction (or in some cases elimination) of parking needed on site, and/or operational parking and access space. This may be essential in allowing the site to accommodate the amount or type of development proposed.

Transport Assessments

8.8 Transport Assessments are detailed assessments of the anticipated transport effects of a development proposal. They are needed to ensure that the transport impacts of the development are understood, in order that these can be assessed for compliance with policy. Transport Assessments require significant amounts of data and access to professional modelling tools, and as such are generally carried out by specialist transport planning consultants. They are most relevant for large development proposals.

8.9 In most respects the outputs of the Transport Assessment are an understanding of the numbers of trips and likely modes. The main purpose of this will be to ensure safe access to and from the site, and to establish whether any measures are needed to mitigate the effects of the numbers of additional vehicles using the highway; these matters are outside the scope of this SPD. In respect of parking, the Transport Assessment will provide an indication of the

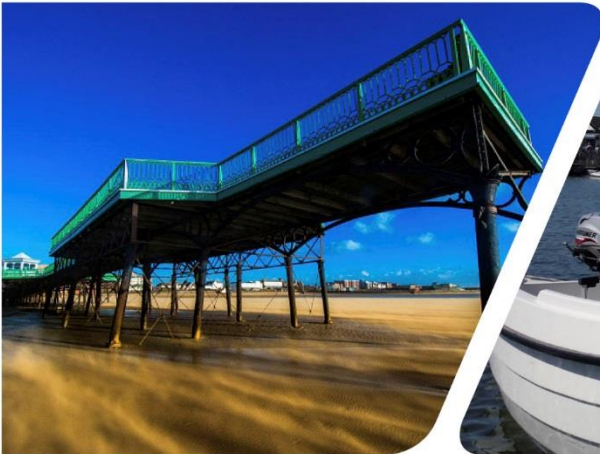
numbers of vehicles that will need to be provided for, and this can then be related to the benchmark requirement in the standards in Chapter 4. However, care is needed as, in order to make an assessment of the effects on the wider highway network and ensure provision of necessary highway works are carried out, it is sometimes necessary to undertake the Transport Assessment based on “robust” (i.e. worst-case) assumptions regarding traffic generation. It would not be justified to base the numbers of parking spaces required on the worst-case assumptions, in view of national guidance that prioritises pedestrian and cycle access, then public transport.

Transport Statements

- 8.10 Transport Statements are simplified versions of transport assessments where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required. Transport Statements do not necessarily need to be produced by specialist transport professionals, but sufficient information will be needed to demonstrate that the principal issues have been identified and to explain how these are addressed.
- 8.11 Some aspects dealt with by transport statements (such as details of access points, numbers of vehicle movements etc) fall outside the scope of this SPD. In respect of parking, the transport statement will need to provide:
- an explanation of the parking strategy for the development, related to the context of the development proposal and the surrounding area;
 - details of the numbers of different types of spaces, and how this will provide for the needs of the development;
 - details of any management arrangements where applicable (e.g. measures to prevent unauthorised parking, allocation of spaces)

9. Glossary

Access zone	1.2m wide zone marked by hatching between parking spaces for disabled users
Fast charger	Type of electric vehicle charge point used by Lancashire County Council which supply 7kw/h and take around three hours to charge a vehicle, but are able to charge two vehicles at a time
GFA	Gross floor area
Operational Parking	Parking spaces for vehicles regularly and necessarily used in the operation of the business
Passive Charging Points	Where the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) is in place to ensure simple installation and activation of a charging point at a future date.
Rear safety zone	1.2m wide zone marked by hatching to provide access to the rear of a vehicle parked in spaces for disabled users
<i>Sui generis</i>	Type of use that falls into a category of its own, i.e. does not fall into one of the use classes defined by the Use Classes Order
Town centres	Areas designated in local plans where predominantly town centre uses are located. Within Fylde, areas of the Borough in central St. Annes, Lytham and Kirkham
Transport Assessment	A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development.
Transport Statement	A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.
Travel Plan	A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.
Ultra Charger	Type of electric vehicle charge point used by Lancashire County Council which supply 50kw/h and allow most vehicles to take on a full charge in less than an hour
Use Classes Order	The Town and Country Planning (Use Classes) Order 1987 (as amended). This classifies uses of land and buildings into various categories known as 'Use Classes'. Generally, a change to a new use that falls within the same use class as before which does not involve building work is not development under the planning acts. Changes of use between use classes will require planning permission although in many cases this is automatic through permitted development rights, or requiring a prior notification only.



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Date: October 2023

Review Date: TBC

Our Ref: PSPD

Authorised by: Julie Glaister, Planning Policy Manager

Summary of Representations Made Under Regulation 13 to the Draft Provision of Parking on New Developments SPD

The consultation on the Draft SPD resulted in responses from 13 consultees. The points raised in representation are set out below and the Council's response is shown in the right hand column, including reference to any proposed changes that will be reflected in the adoption statement. The responses are ordered in accordance with the structure of the Draft SPD, with the chapter headings set out for reference.

Consultee	Key text from representation	Council Response
General		
Benjamin Rogers – Lancashire County Council (Lead Local Flood Authority)	please note that the LLFA has no comments to make on the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD).	Comment noted
Christine Ibbotson	I can't say I have read all this nor understood the details. It looks like the document has been through many experts before us!	Comment noted
Christopher Carroll – Sport England	Thank you for consulting Sport England on the above draft Supplementary Planning Document (SPD). Sport England have no objections to the document. Although, Sport England have no specific comments on the content of the draft SPD we would like to make you aware of our statutory role and the following guidance. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the	Support welcomed. Comments noted. The SPD will support the objectives mentioned.

	<p>right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p>	
Nicola Elsworth – Homes England	<p>Homes England does not wish to make any representations on the above consultation. We will however continue to engage with you as appropriate.</p>	Comment noted
Sharon Jenkins – Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>[see relevant section]</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>	<p>Comment noted: issues considered in relevant section</p> <p>The Draft SPD has been subject to screening as to whether SEA is required, and found to not require it.</p>

Paul Walton – PWA Planning for Dixon Grange/AFC Fylde	PWA Planning is retained by Dixon Grange and AFC Fylde to submit formal representations in respect of the consultation on the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD). Dixon Grange Limited and the owners of the majority of the Mill Farm Sports Village, which forms part of strategic allocation MUS3 of the Fylde Local Plan and is recognised as a 'Mixed Use Development Site'. The ownership includes Mill Farm sports stadium, which is home to AFC Fylde and is the largest stadium within the Borough.	Comment noted
Rachel White – NJL Consulting for Persimmon Homes Ltd	<p>These representations have been prepared by NJL Consulting on behalf of Persimmon Homes (North West) ('Persimmon') in response to the publication of the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) under Regulation 12 and 13 consultation.</p> <p>The Draft SPD is intended to provide further guidance on the requirements for parking on development sites set out with the adopted Development Plan, in this case the Fylde Local Plan 2032 (incorporating Partial Review) which was adopted by the Council on 6th December 2021. The Provision of Parking on New Developments SPD will supersede the existing adopted standards which are the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005).</p> <p>These representations provide specific responses to the relevant requirements set out within the Draft SPD, with a specific focus on the design, dimensions and layout of parking. Persimmon has a number of concerns regarding the parking standards outlined within the Draft SPD. It is Persimmon's view that the document requires several modifications w for the document to be sound. The following section provides comments on the relevant section of the Draft SPD.</p> <p>Summary This representation has been prepared by NJL Consulting on behalf of Persimmon in response to the publication of the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) under</p>	Comments noted: the specific matters are considered in the individual sections

	<p>Regulation 12 and 13 consultation. The Company has strong concerns about the soundness of the parking standards set out in the Draft SPD. The representations demonstrate the Draft SPD has a fundamental misunderstanding of Part M of the Building Regulations, average UK car dimensions and high-quality highways design solutions, which Persimmon objects to. This is in addition to conflicts with the adopted Local Plan which refers to the reduction in dependence on the private car as a general principle of good design (please refer to Strategic Policy GD7). The Draft SPD, however seems to contradict this principle by seeking to increase hardstanding, and therefore promotes the reliance on the private car. This requirement to increase hardstanding within the Draft SPD further conflicts with the Council's ambitions to integrate landscaping within new development sites, in particular relation to highways to provide additional benefits (please refer to Strategic Policy ENV1). It is therefore Persimmon's firm view that the suggested modifications to the Draft SPD seek promote both sustainable transport and good design in accordance with the recently adopted Local Plan. For justification, a summary of our rationale is provided below:</p> <ul style="list-style-type: none"> • Facilitation of EV charging points on all forms of residential dwellings; • Recommendation of appropriate forms of cycle storage; • Parking dimensions based on average UK car dimensions, MfS guidance and Lancashire County Council standards that can appropriately integrate landscaping; and • Individual requirements of the three separate categories of Part M of the Building Regulations. <p>We trust these comments are helpful in considering the soundness of the Draft SPD, and provide valuable insight for making modifications to the SPD.</p>	
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<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>Lancashire County Council's School Planning Team welcome the opportunity to contribute to the Supplementary Planning Documents Consultation – June 2023. We recognise the value of engaging with Local Councils at the earliest stage of their plans to ensure the future needs of education are highlighted and documented within the local plan policies. The value of local knowledge can help to define and shape the future of local communities, ensuring the right level of infrastructure is achieved to meet the growth of housing and employment.</p> <p>The School Planning Team has worked closely with colleagues at Fylde Council over a number of years as they develop Local Plans, Strategic Policies and Supplementary Planning Documents to ensure the infrastructure requirements are included within the policies to support the successful delivery of sustainable housing development, including the allocation of land for new school provision.</p> <p>The School Planning Team also request that as part of the Supplementary Planning Document Consultation Fylde Council take into consideration the new LCC School Site Criteria as part of infrastructure delivery especially in relation to Biodiversity Net Gain which is a new statutory requirement from November 2023. Additionally, the site must not be within flood zone 2 or 3 or subject to ground water flooding.</p> <p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Suitable adopted highway to be provided to the boundary of the school entrance. • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. 	<p>The relevant section of the School Site Criteria are quoted (without reference) further on in the representation</p> <p>The following bullets are from the School Site Criteria</p> <p>This falls outside the scope of what the SPD will cover.</p> <p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a consideration in the determination of the parking</p>
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	<ul style="list-style-type: none"> • Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network. • Road access should not be from single access estate roads, a through route is strongly preferred. • Public transport nearby to support green travel objectives. <p>Lancashire County Council's School Planning Team wish to thank Fylde Council for the opportunity to engage in this process. We look forward to further engagement in the future to work towards all new schools being carbon neutral and meeting LCC School Site Criteria which includes environmental impact mitigation, supporting Fylde Council's Climate Emergency Review.</p>	<p>required and are reflected in the parking standards.</p> <p>Pupil drop off areas can be added to the parking standards</p> <p>Road access is beyond the scope of the SPD.</p> <p>Public transport should be considered through Travel Plans, as noted in the SPD</p>
Melanie Lindsley – The Coal Authority	On the basis that the area does not lie on the coalfield the Planning team at the Coal Authority have no comments to make on the draft SPD's.	Comment noted
Glenn Robinson – Lancashire County Council Highways	Generally supportive of the document.	Support welcomed
Introduction		
	No responses to this section	

Policy and Guidance Review		
Christopher Carroll – Sport England	<p>Sport England, in conjunction with Public Health England (now Office for Health Improvement and Disparities (OHID)), has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the development of the SPD, particularly principles 6, 7 and 8. The document can be downloaded via the following link:</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p>	Active Design has been added to the list of documents reviewed. The relevant matter throughout the document is the provision of cycle parking to encourage active travel; the SPD includes specific requirements for cycle parking related to all developments.
Overall Approach to Parking Requirements		
Paul Walton – PWA Planning for Dixon Grange/AFC Fylde	<p>Having reviewed the draft SPD, Dixon Grange / AFC Fylde query whether the MUS3 strategic site should be considered as an area that is rural and of low accessibility. Mill Farm Sports Village is shown on the mapping at Figure 4 of the SPD as adjacent to an area of ‘Moderate Accessibility’. However this designation appears somewhat selective and does not appear to reflect the fact that the location was deemed a sustainable location for development at the time of allocation within the Local Plan in 2018. As part of previous planning approvals for Mill Farm Sports Village, the owners have also made financial contributions towards improvements to the provision of public transport. Furthermore, transport assessments submitted within previous</p>	The identification of a site as being within the area described as low accessibility for this document does not imply that the site is not a sustainable location. The Mill Farm site is acknowledged by the Council in the Local Plan as a sustainable location for the uses allocated. The designation here is solely for the purpose of determining whether a site is sufficiently accessible to justify reductions in the car parking standards. As noted by the respondent, the site

	<p>planning applications have proven the land accessible by a range of non-car modes; a position which has been accepted by the decision-taker on each occasion. The Mill Farm Sports Village should therefore be recognised as being of moderate accessibility, at worst.</p>	<p>lies marginally outside: reduced parking requirements would not be appropriate.</p>
<p>Parking Standards</p>		
<p>Christopher Carroll – Sport England</p>	<p>Limited information can be found within the draft SPD with regards car parking requirements for new sports clubs and to serve new playing field sites. It is essential therefore that the SPD reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document, <u>where car parking is specifically mentioned in paragraphs 13 and 53</u>. The document can be downloaded via the following link: https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>[Paragraph 13 of the Guidance document states:</p> <p><i>13. If a local planning authority is in any doubt as to whether a proposed development will prejudice the use of any part of a playing field it should consult Sport England. This will allow Sport England, in discussion with the relevant sport’s national governing bodies, to take an informed view of the potential impact of the proposal. Examples of development which is likely to prejudice the use of a playing field include:</i></p> <p>...</p>	<p>The draft SPD follows previous practice and sets out a requirement in the parking standard for “Class F2 Indoor or outdoor swimming baths, skating rinks, and outdoor sports or recreations not involving motorised vehicles or firearms, with 500 or fewer seats or standing spaces”, in accordance with the Use Classes Order (as amended), but distinguishing from stadia with over 500 seats/spaces in order that their particular requirements are addressed. The SPD does not go further into how the standard might be met on a range of types of development site. The response does not suggest that the standards set are inappropriate.</p> <p>The SPD is fully in line with paragraphs 98 and 99.</p> <p>In respect of paragraph 13 of the Guidance document, the SPD is in line with the response. Although the SPD does not mention these circumstances specifically, the Local Plan has an overarching requirement that the number of parking spaces on a site should not normally be reduced.</p>

	<ul style="list-style-type: none"> • <i>development affecting off-site facilities which support the use of the playing field, e.g. off-site changing or parking facilities.</i> <p>[Paragraph 53 states: <i>Can car parking meet with Exception 2? [Exception 2 to the general policy of resisting development of playing fields: The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.]</i></p> <p><i>53. Yes, provided it is clearly demonstrated as being necessary for improving access to the playing field for sporting use, rather than for other non-sporting uses, e.g. where a car park intended for wider school use impinges on a playing field.]</i></p>	<p>The SPD does not cover detail requirements for specific land uses, other than in providing an overall standard. Any proposal would need to comply with the standards. The guidance does not compromise other policies which seek to retain playing fields in accordance with national policy and Sport England’s guidance.</p>
<p>Paul Walton – PWA Planning for Dixon Grange/AFC Fylde</p>	<p>Dixon Grange / AFC Fylde nevertheless support the intention of Fylde Borough Council to adopt the proposed minimum car parking standards in less accessible areas. Of particular relevance is the standard being proposed for Use Class F2 outdoor sports stadia with more than 500 seats or standing spaces, at a rate of 1 parking space per 10 seats. It is noted that this is a considerably greater level of provision than was set out as a ‘maximum’ standard within the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005), which the SPD is set to supersede. The use of maximum standards, as per the Structure Plan are clearly now inconsistent with the National Planning Policy Framework, which at Paragraph 108 clearly states that they should only be used in instances where there is clear and compelling justification. It is accepted that such circumstances do not exist within the Borough of Fylde and it is right to therefore seek to adopt minimum standards.</p> <p>However, it is considered that the parking rate could safely be reduced within the SPD to a minimum rate of 1 space per 15 seats in circumstances where the stadia implement measures to actively manage car parking during</p>	<p>Comments noted</p> <p>The Council will apply standards flexibly based on the circumstances of the site and development proposed, as set out in Chapter 3 of the SPD. This</p>

	<p>events and promote sustainable modes of travel to staff and visitors (via a Car Parking Management Strategy). Such an approach is considered wholly consistent with the National Planning Policy Framework and Local Plan Policy T5, which together promote flexibility towards parking provision with minimum levels, that are based upon the use and local context of a particular development.</p> <p>Otherwise, the application of the minimum standards approach is acknowledged and supported. The corollary of this is that parking requirements above these minimum standards should not be required as part of the planning process and any provision in excess of the minimum standards should be a matter for the developer / operator.</p> <p>It is trusted that these representations will be attributed weight in the final decision on the SPD, taking into account the role of Dixon Grange / AFC Fylde, as the operator of the largest stadium within Fylde.</p>	<p>could include circumstances where a detailed management strategy controlled by a planning condition are imposed, where the Council considers this to be suitable. It is not considered appropriate for this to be provided for within the standard, however.</p> <p>The Council may, on occasion, require parking above the minimum standards where there remains conflict with Local Plan policies.</p>
<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. ... • Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network. ... 	<p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a consideration in the determination of the parking required and are reflected in the parking standards.</p> <p>Drop off zones can be added to the parking standards (already included for nurseries).</p>

	<ul style="list-style-type: none"> • Public transport nearby to support green travel objectives. 	<p>Public transport should be considered through Travel Plans, as noted in the SPD and reflected in the parking standards.</p>
<p>Design, dimensions and layout of parking</p>		
<p>Andrew Leysens – United Utilities</p>	<p>In accordance with our comments to the Draft Flooding, Water Management and Sustainable Urban Drainage Systems (SuDS) SPD, we are encouraged by the requirements in the draft Parking SPD to have all parking constructed using pervious paving. We would encourage you to include a specific section regarding the paving over of front gardens. Within our response to the Draft Flooding SPD, we included the following wording, which we would encourage you to repeat in your draft Parking SPD:</p> <p>‘The paving over of gardens has a significant impact on public sewers. The paving over of gardens can increase the flow of rainwater to the public sewer rather than allowing it to naturally infiltrate to ground. This increases the flow of water to the public sewer, which increases the likelihood of flooding and the likelihood that a public sewer will spill into a waterbody. The combined effect of many properties paving over gardens places a huge strain on our sewers during storm events.</p> <p>In the first instance, we encourage you to not pave over your garden areas. However, if you do, we request that you do all you can to ensure that surface water can continue to drain via a permeable surface and / or is directed to a permeable surface such as flower beds. In some instances, you may require planning permission. Further advice can be found here.</p> <p>In constructing any new householder project, including any new parking, we would encourage you to incorporate rain gardens. Guidance on rain gardens can be found here and here.’</p>	<p>Whilst the advice is helpful, the level of detail here is excessive for the SPD which relates to parking. Elements of the text in the response can be used to provide some assistance, with full details included in the Flooding, Water Management and Sustainable Drainage Systems SPD.</p>

	<p>Under the heading of Landscaping and Materials we would also request that you include the following wording.</p> <p>‘When bringing forward new parking proposals, you will be required to integrate your landscaping proposals with the strategy for sustainable surface water management. Every opportunity should be taken to include source control and slow the flow of surface water through the incorporation of blue and green Infrastructure, which can make a positive contribution to the quality of the public realm.</p> <p>The evaluation of such surface water management opportunities must be undertaken early in the design process. The design and landscaping of the site should be intrinsically linked to opportunities for surface water management improvements which could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> • permeable surfacing; • bioretention tree pits; • rain gardens; • soakaways and filter drainage; and • retrofitted swales. <p>Applicants are advised to refer to the Susdrain website which includes a range of case studies that show examples of how SuDS have been implemented in the urban environment. Interesting examples, which demonstrate how run off can be captured by landscaping in urban environments, include:</p> <ul style="list-style-type: none"> - Grey to Green Phase 1, Sheffield; - Crescent Gardens SuDS project, High Road, Haringey; and - Derby by Midland Station, retrofit tree pits, Derby. <p>Applicants can also refer to ‘Designing Rain Gardens: A Practical Guide’ produced by Urban Design London, which includes some excellent imagery</p>	
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	of how surface water management principles have been integrated with landscaping in urban environments in England.’	
Christopher Carroll – Sport England	<p>Sport England, in conjunction with Public Health England (now Office for Health Improvement and Disparities (OHID)), has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the development of the SPD, particularly principles 6, 7 and 8. The document can be downloaded via the following link:</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>The section on our web page now contains updated case studies and more information regarding putting the principles of Active Design into practice. In order to bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) (BREEAM).</p>	Comment noted. The design requirements set out in Chapter 5 of the SPD follow the approach set out in the Active Design document, as far as is directly relevant to the SPD. In particular, the requirement for clearly identifiable space for pedestrian movement within, across and around parking areas of all types including within domestic curtilage follows the approach taken in the Active Design document.
Sharon Jenkins – Natural England	<p>Green Infrastructure</p> <p>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should ‘take a strategic approach to maintaining and enhancing</p>	The SPD includes requirements for landscaping including trees within car parking areas.

	<p>Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations</p> <p>The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p>	<p>The SPD requires landscaping in association with parking areas, appropriate to the development considered.</p> <p>The SPD recognises the impact of lighting whilst requiring its provision to ensure its full coverage in the interests of security and amenity.</p>
<p>Rachel White – NJL Consulting for Persimmon Homes</p>	<p>In relation to the basic dimension of a parking space, the SPD at paragraph 5.8 sets out '2.5m x 5.0m'. This is in addition to 0.3m of the additional width being provided where there is space to the side. Persimmon fundamentally disagrees with this proposed parking dimension in accordance with the Part M of the Building Regulations and Manual for Streets (MfS) guidance which establish a standard parking space dimension of '2.4m x 4.8m'. Moreover, the average car length in the UK is 4.4m, with estates, saloons, and MPVs measuring circa 4.7m, which all comfortably fit within Part M standards. It is</p>	<p>The dimension used for a standard parking space accords with the Council's current practice for marking its own spaces on public car parking areas. The dimensions used in Part M are the minima required for compliance with Building Regulations. However, it is widely understood that cars have been becoming larger; the last model Ford Mondeo to be produced was 4.87m</p>

	<p>Persimmon’s view that introducing parking bays at 2.5m x 5m plus an additional 0.3m of hardstanding to the end of bays would have a detrimental impact to the street scene, particularly in the case of terraced dwellings. This design approach would severely restrict opportunities for incorporating soft landscaping, and overall result in poor design outcomes.</p>	<p>long, longer than the 4.8m referred to. Based on data provided later in the representation, the average length of an SUV is 4.79m: therefore 50% of SUVs are 4.79m long or longer, meaning that a very significant proportion of SUVs are too long for a 4.8m spacing. As SUVs now represent around 40% of vehicles on the road, continuing to base the size of spaces on 4.8m would be inadequate.</p> <p>Increasingly the width of vehicles has led to inadequate space to open vehicle doors: a Land Rover Discovery Sport for instance allows just 16.5 cm of space on either side within a 2.4m space. The Council’s decision to marginally enlarge the required spaces is justified.</p> <p>The representation misstates the requirement where it refers to “an additional 0.3m of hardstanding to the end of bays”: additional hardstanding is required to the side, to ensure that occupants are able to exit vehicles without trampling adjacent soft landscaping, which otherwise would be inevitable.</p> <p>Whilst the requirement inevitably requires marginally more space, good design requires that developments are appropriately landscaped. Development densities should not be so high so as to make poor design inevitable. Where space for parking and soft landscaping cannot be found within a design, a complete redesign with that requirement central to the proposal should be undertaken.</p>
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	<p>Paragraph 5.11 of the SPD goes onto establish the dimensions of parallel parking spaces at '2m x 5.6m'. It is Persimmon's firm view that the dimension of parallel parking spaces should adhere to required standards of '2m x 6m' with splayed ends, as outlined in Manual for Street guidance.</p> <p>Suggested Modification: The requisite parking space dimensions should be consistent with Part M of the Building Regulations and MfS guidance. For standard parking spaces this is '2.4m x 4.8m', with parallel parking spaced at '2m x 6m.</p> <p>It is understood that Paragraph 5.18 refers to Part M of the Building Regulations regarding driveways of individual residential dwellings and pedestrian access. In the first instance, Persimmon highlight that the Part M of the Building Regulations is divided into 3 separate categories:</p> <ul style="list-style-type: none"> • M4(1) Visitable dwellings; • M4(2) Accessible and adaptable dwellings; and • M4(3) Wheelchair user dwellings. <p>The three categories have varying requirements that Persimmon comment, as follows: M4(1) Visitable dwellings For M4(1) the requirement for a driveway would be to allow pedestrian access (0.9m) past a parked car (2.1m) to the principal entrance (please refer to Appendix 1) <i>[this shows an extract of an NHBC document showing what appears to be an earlier version of Part M]</i>, which equates to a 3m width driveway for a single drive. A double width driveway would therefore be a 2.4m standard parking dimensions plus an additional 3m that totals 5.4m. It should be understood that the majority of dwellings fall under this category.</p> <p>M4(2) Accessible and adaptable dwellings For M4(2) dwellings the requirement would be to provide as per M4(1) above, but to allow space for future widening of one of the standard parking bay to 3.3m width. Therefore, a double would be increased from 5.4m to 5.7m to allow for</p>	<p>Comment noted. The required dimension is altered to 2m x 6m for the final SPD.</p> <p>The SPD sets out the general minimum requirement for private dwellings. The specific additional requirements of M4(2) and M4(3) are not included; reference to the Part M document will be sufficient.</p> <p>The SPD makes a requirement for the pedestrian approach route to be clearly demarcated and, as such, not part of the drive. It is required to be 0.9m wide. The approach suggested by the respondent, whereby the pedestrian route is combined into the driveway, represents poor design that would result in cars parked over the space intended to provide the pedestrian width, and in consequence no apparent pedestrian route. Part M does not sum the 0.9m requirement with 2.1m and does not refer to a 3m drive.</p> <p>The widths of standard parking spaces, including the Council's 2.5m, only provide sufficient room</p>
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	<p>future widening. M4(3) Wheelchair user dwellings For M4(3) dwellings the requirement is to provide a standard parking space at 2.4m, plus an additional 1.2m width to one side and the rear. This equates to 3.6m x 6m for a single drive, and a 6m width for a double drive. In view of the above, it is evident that the Draft SPD demonstrates a fundamental misunderstanding of AD Part M of the Building Regulations. The Draft SPD proposes a driveway width of 3.7m for a single and 6.3m for a double. This is in excess of M4(3) dwelling standards which cater for impaired movement and would assume that all dwellings across a development are for wheelchair users. Given that the majority of dwellings would be classed as M4(1), Persimmon object to the proposed requirements for individual residential driveways at Paragraph 5.18 of the Draft SPD.</p> <p>It is also important to note that Part M of the Building Regulations does not require 0.9m pedestrian access to be of a different material to the driveway. This is a further misunderstanding of the Building Regulations within the SPD. To reiterate, the requested standards would result in a street scene and design that is overly dominated by hard surfacing, which would result in poor quality design. This would inherently conflict with the adopted Local Plan aspirations to prioritise the needs of non-motorised users and reduce the dependence on private cars set out in Strategic Policy GD7 'Achieving Good Design in Development.' Moreover, Strategic Policy ENV1 'Landscape' considers that highways can be effectively designed with the integration of landscaping such as tree planting to offer additional benefits from noise and pollution (Local Plan, Page 182).</p> <p>Suggested Modification: The proposed standards of individual residential dwellings and pedestrian access should accurately reflect the three categories of Part M of the Building Regulations. The SPD should also note that the majority of dwellings fall under Part M4(1), and therefore the Council would largely expect to see a 3m width driveway for a single drive and a 5.4m width for a double drive.</p>	<p>for car doors to be opened if they adjoin another similar space. Therefore, the additional 0.3m of space on either side of the whole parking area is essential: it would be inappropriate if this were soft landscaping. However, where the driveway adjoins the pedestrian route, this is not needed.</p> <p>The SPD sets out a driveway width of 5m for two spaces, plus a separate pedestrian access of 0.9m, with 0.3m edge buffer to the drive added where necessary (Fig. 9 of the SPD).</p> <p>The provision of the clearly defined pedestrian route is a requirement of the SPD, providing detail on the application of Local Plan Policy GD7.</p> <p>On the contrary, it would ensure that the interests of pedestrians are prioritised, as stated in the policy.</p> <p>The Council does not accept that the SPD should be modified in line with the text provided.</p>
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	<p>Paragraph 5.24 of the Draft SPD sets the requirements for new garages whether on a new development site or within the curtilage of an existing property, as follows:</p> <ul style="list-style-type: none"> • ‘Minimum internal dimensions 6.4m x 3.0m for a single garage; • Minimum internal dimensions 6.4m x 5.5m for a double garage; • Any door at the side intended to open inwards will need to be at least 5m from the garage door (measured internally); • Where a parking space is to be provided in front of the garage, a buffer of 0.9m will be required between the garage and the space; • Doorway width for a single garage to be a minimum of 2.5m; • Doorway width for a double garage to be a minimum of 5m. Where two individual doors are to be fitted, they should each be a minimum 2.5m wide.’ <p>In consideration of Lancashire County Council parking standards and MfS guidelines, Persimmon views the proposed internal length of 6.4m for a single and double garage to be excessive. The aforementioned Policy and guidance recommend an internal length of 6m for a garage to be counted as a parking space, which is accepted to allow room for a parked car circa 4.7m length, as well as cycle storage.</p> <p>As previously established, the average UK car length is 4.4m (4.7m for saloons / estates / MPVs and 4.79m for SUVs), therefore the proposed 0.9m buffer between a parking space and a garage door is disproportionate. A 5.5m overall drive length to the front of a garage is substantial space to operate an ‘up and over’ garage door (typically 0.7m) and a parking car (based on average car sizes).</p> <p>In addition to the above, based on the average UK car width of 1.82m (smaller cars circa 1.62m, saloons / estates circa 1.83m and SUVs / MPVs circa 1.95m) the proposed minimum garage door width of 2.5m is excessive. All aforementioned car type widths comfortably pass through a standard garage door opening of 2.26m (structural opening).</p>	<p>The internal length proposed is consistent with the dimension required by the St. Anne’s on the Sea Neighbourhood Development Plan, and therefore already required in that part of the Borough.</p> <p>The zone required is not solely to allow for the opening of the garage: it is to allow for pedestrian access, in particular so that access is maintained to the rear of the property for bins and cycles. The text of the SPD has been revised to make clear it is for that purpose (so would not apply for instance when the gate to the rear is between the dwelling and the garage).</p> <p>A garage can only be considered as a parking space if it is easy to use on a daily/casual basis. Close fitting doorway spaces discourage this type</p>
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	<p>Suggested Modification: The proposed garage standards to be amended to reflect average UK car dimensions in accordance with Lancashire County Council and MfS guidance.</p> <p>As established above, the proposed parking dimension standards create over domination of hardstanding with limited opportunity for soft landscaping. As a result, the 1m separation buffer recommendation at Paragraph 5.45 is not feasible. The below extract taken from the SPD at Page 50 shows 6no. parking spaces which is only sufficient provision for 3 no. 2 to 3 bedroomed homes. Notwithstanding, the illustration depicts 5no. properties. Therefore, if two properties are subtracted (or when four additional spaces are added along with landscaping), it is evident that the parking and landscape areas are considerably wider than the dwellings themselves. This demonstrates a clear design flaw and an inefficient use of land.</p> <p>Persimmon, however would welcome the 1m landscape buffer if a flexible view is taken on dwellings within a terraced form, and a provision of 150% parking is acceptable.</p> <p><i>[reproduces Fig. 15 from p50 of the Draft SPD]</i></p>	<p>of use. The requirement provides for a comfortable entrance but is not excessive.</p> <p>As set out in the Parking Standards in Table 2, 1-2 bedroom affordable rented housing, and 2-bedroom houses in areas of moderate and high accessibility, have a minimum requirement of 1 space per dwelling. In low accessibility areas, more space would be required to accommodate the same number of dwellings.</p> <p>It is unclear what this means; the minimum standards are set out in Table 2; the Council will apply standards flexibly as stated in Chapter 3 of the SPD, based on the circumstances of the site.</p>
<p>Glenn Robinson – Lancashire County Council Highways</p>	<p>Would recommend reviewing Section 5 so that it is in line with highway standards.</p> <p>Manual for Street on page 111 Fig 8.19 show parallel parking space to be 6.0m as opposed to 5.6m on page 42 (Fig 7) of the draft document.</p> <p>DfT's Traffic Signs Manual Chapter 5 Fig20.3 shows disable bays a 6.6m when parallel.</p>	<p>Comment noted. The chapter has been reviewed.</p> <p>Noted: Fig.7 of the SPD has been amended.</p> <p>Noted: text has been added to set out this requirement</p>

<p>Emily Hrycan – Historic England</p>	<p>We would encourage you to consider the historic environment in the production of your SPD. We recommend that you seek advice from the local authority conservation officer and from the appropriate archaeological staff. They are best placed to provide information on the historic environment, advise on local historic environment issues and priorities, indicate how heritage assets may be affected and identify opportunities for securing wider benefits through the conservation and enhancement of the historic environment.</p>	<p>Comment noted. The Council’s Conservation Officer has recommended the use of studs rather than white lines, and general avoidance of the use of paint, to mark parking spaces on sensitive sites such as within Conservation Areas and the settings and curtilage of Listed Buildings. A short section has been added to the SPD to set this out.</p>
<p>Parking for Cycles and Other Non-Car Vehicles</p>		
<p>Rachel White – NJL Consulting for Persimmon Homes</p>	<p>Parking for Cycles and Other Vehicles</p> <p>Paragraphs 6.4 to 6.7 of the Draft SPD set out standards for cycle storage. As previously established, Persimmon consider that a garage with an internal length of 6m provides sufficient space for cycle storage. This is based on Lancashire County Council parking standards and MfS guidance. For properties without a garage, Persimmon recommend that cycle storage in the form of sheds to the rear garden is the most appropriate, particularly in terraced form. Such a provision can be secured through an appropriately worded planning condition. This approach ensures safe and secure design for occupants.</p> <p>Suggested Modification: The proposed standards should be amended to reflect average UK car dimensions in accordance with Lancashire County Council and MfS guidance.</p>	<p>The respondent does not suggest that there is any issue with the need for provision for cycle parking. The matter of garage dimensions is dealt with in the section concerning Chapter 5 above. The Council accepts that sheds can be an acceptable solution: where a garage is not present, the provision of rear access other than through the dwelling is the most important consideration, and this is reflected in the SPD. No changes needed.</p>

Electric Vehicle Charging		
<p>Rachel White – NJL Consulting for Persimmon Homes</p>	<p>Electric Vehicle Charging</p> <p>In terms of electric vehicle charge points, the Draft SPD establishes at Paragraph 7.12 that the Council, ‘in general will not accept charging points to the attached to the front elevation of a dwelling.’ Persimmon fundamentally object to this as there will be instances of mid-terraced units with no shared path between the front elevation and parking area where this arrangement is necessary and the most appropriate. This is in addition to the case of semi-detached units (with no shared path) where the parking is more central to the dwellings, and therefore it is the most efficient to locate the charging point on the front elevation.</p> <p>Suggested Modification: The proposed wording should be amended to recognise instances where it is most appropriate to locate the EV charge point along the front elevation.</p>	<p>The phrase used “in general...” allows for there to be exceptions where it can be accepted. However, it is likely that terraced units will more commonly have a shared path, and the charging points will be on the other side adjacent to the parking area. In the case of semi-detached dwellings, it is unlikely that the Council will accept parking located centrally in front of a pair of dwellings, and the SPD sets out the expectation for parking to be located towards the side of the plot frontage. No change needed.</p>
Travel Plans, Transport Assessments and Transport Statements		
<p>Robert Taylor – Lancashire County Council Schools Planning Team</p>	<p>With reference to the Draft Provision of Parking on New Developments Supplementary Planning Document (SPD) Lancashire County Council would welcome the opportunity to work with Fylde Council to achieve the following:</p> <ul style="list-style-type: none"> • Suitable adopted highway to be provided to the boundary of the school entrance. • Safe walking/cycling routes from the surrounding housing and be within reasonable walking/cycling distance. 	<p>This falls outside the scope of what the SPD will cover.</p> <p>Provision of these falls outside the scope of the SPD, however their availability will be a consideration in Travel Plans, which will be a</p>

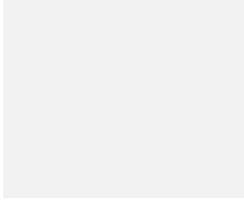
	<ul style="list-style-type: none"> • Suitable road access for construction traffic and allow for pupil drop off without disruption to the road network. • Road access should not be from single access estate roads, a through route is strongly preferred. • Public transport nearby to support green travel objectives. 	<p>consideration in the determination of the parking required and are reflected in the parking standards.</p> <p>Pupil drop off areas can be added to the parking standards</p> <p>Road access is beyond the scope of the SPD.</p> <p>Public transport should be considered through Travel Plans, as noted in the SPD</p>
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Fylde Council: Provision of Parking on New Developments Supplementary Planning Document

SEA Screening Report

MAY 2023

Contacts



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Fylde Council: Fylde Council: Provision of Parking on New Developments Supplementary Planning Document

SEA Screening Report

Author	Revati Khambete
Checker	Catherine Wright
Reviewer	Sarah Tooby
Approver	Frank Hayes
Date	MAY 2023

Version Control

Version	Date	Author	Checker	Reviewer	Approver	Changes
V1	March 2023	RK	CW	ST	FH	First Draft for Client Review
V2	April 2023	CW	ST	ST	FH	Update following client review
V3	April 2023	CW	ST	ST	ST	Minor update for consultation
V4	May 2023	CW	ST	ST	ST	Finalisation following consultation

This report dated 30 May 2023 has been prepared for Fylde Borough Council (the “Client”) in accordance with the terms and conditions of appointment dated 21 February 2023 (the “Appointment”) between the Client **Error! No text of specified style in document.** Limited (“Arcadis”) for the purposes specified in the Appointment. For avoidance of doubt, no other person(s) may use or rely upon this report or its contents, and Arcadis accepts no responsibility for any such use or reliance thereon by any other third party.

Introduction

Fylde Local Plan (incorporating Partial Review)

The Fylde Local Plan to 2032 (incorporating Partial Review) comprises the Fylde Local Plan to 2032 (adopted October 2018) and the revisions to it made through the Partial Review (December 2021). The Partial Review replaces nine policies and elements of the supporting text of the Fylde Local Plan to 2032 (adopted October 2018). Further details can be found on the Council website¹. The Fylde Local Plan to 2032 (incorporating Partial Review) provides the statutory planning framework (the 'Development Plan') for the Borough for non-minerals and waste matters for the period 2011-2032.

Supplementary Planning Documents

Supplementary Planning Documents (SPDs) provide further detail and guidance in relation to policies and proposals within the Development Plan, in this case the Fylde Local Plan to 2032 (incorporating Partial Review) which was adopted by the Council on 6th December 2021. The main objective of this SPD is to provide clarity to applicants as to the requirements for parking on development sites.

Provision of Parking on New Developments SPD

The Draft Provision of Parking on New Developments SPD has been informed by the earlier consultation on the Provision of Parking on New Developments SPD Scoping Report², undertaken between 9th June and 7th July 2022. The SPD Scoping Report describes the proposed scope and content of the SPD and includes questions about the proposed content and options for dealing with particular issues.

The Council is required to prepare a summary (under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012) of the main issues raised and how those issues have been addressed in the SPD. The Statement of Consultation that accompanies this SPD provides a summary of the representations received and for each representation provides a comment from the Council explaining how the issue has been addressed in the SPD. The Draft SPD will be subject to a further full consultation prior to adoption. Issues raised will be reviewed by the Council and considered for inclusion. Whether or not additional issues are included will reflect consideration of the evidence in relation to those issues and whether they can be addressed by the Provision of Parking on New Developments SPD.

The Provision of Parking on New Developments SPD can only provide guidance on how the Council will respond to development proposals through the planning process. It cannot address standing issues that residents or businesses may have regarding parking, except in circumstances where a development proposal that is the subject of a planning application can contribute towards the resolution of the issue.

The Provision of Parking on New Developments SPD will supersede the existing adopted standards which are the Lancashire County Council Joint Lancashire Structure Plan Parking Standards (2005).

The main objective of the SPD is to provide clarity to applicants as to the requirements for parking on development sites. The SPD sets out parking standards for new developments in Fylde, but also seeks to reduce the need for parking on the site and promotes cycle use over private vehicles.

There are five Local Plan policies referenced in the SPD:

- Strategic Policy T4 Enhancing Sustainable Transport Choice
- Non-strategic Policy T5 Parking Standards
- Strategic Policy GD7 Achieving Good Design in Development

¹ Available at: [Adopted Fylde Local Plan to 2032 \(incorporating Partial Review\) – Fylde Council](#) [Accessed 28/02/23]

² Available at: [Provision-of-Parking-on-New-Developments-SPD-Scoping.pdf \(fylde.gov.uk\)](#) [Accessed: 01/03/23]

- Strategic Policy H2 Density and Mix of New Residential Development
- Strategic Policy CL2 Surface Water Run-Off and Sustainable Drainage

The aims of these policies are to set out the design, layout and accessibility of new development in terms of parking, and also how parking provision can be most effectively used within existing and future development sites.

SEA Screening

Certain types of planning documents are required to be subject to Strategic Environmental Assessment (SEA). SEA is a legal requirement set out in The Environmental Assessment of Plans and Programmes Regulations 2004³ (the SEA Regulations). SEA is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.

The Provision of Parking on New Developments SPD has been screened to determine if application of the SEA Regulations is required. The purpose of this report is to document the SEA Screening decision. This SEA Screening Report has been consulted on for three weeks with the Environment Agency, Natural England and Historic England.

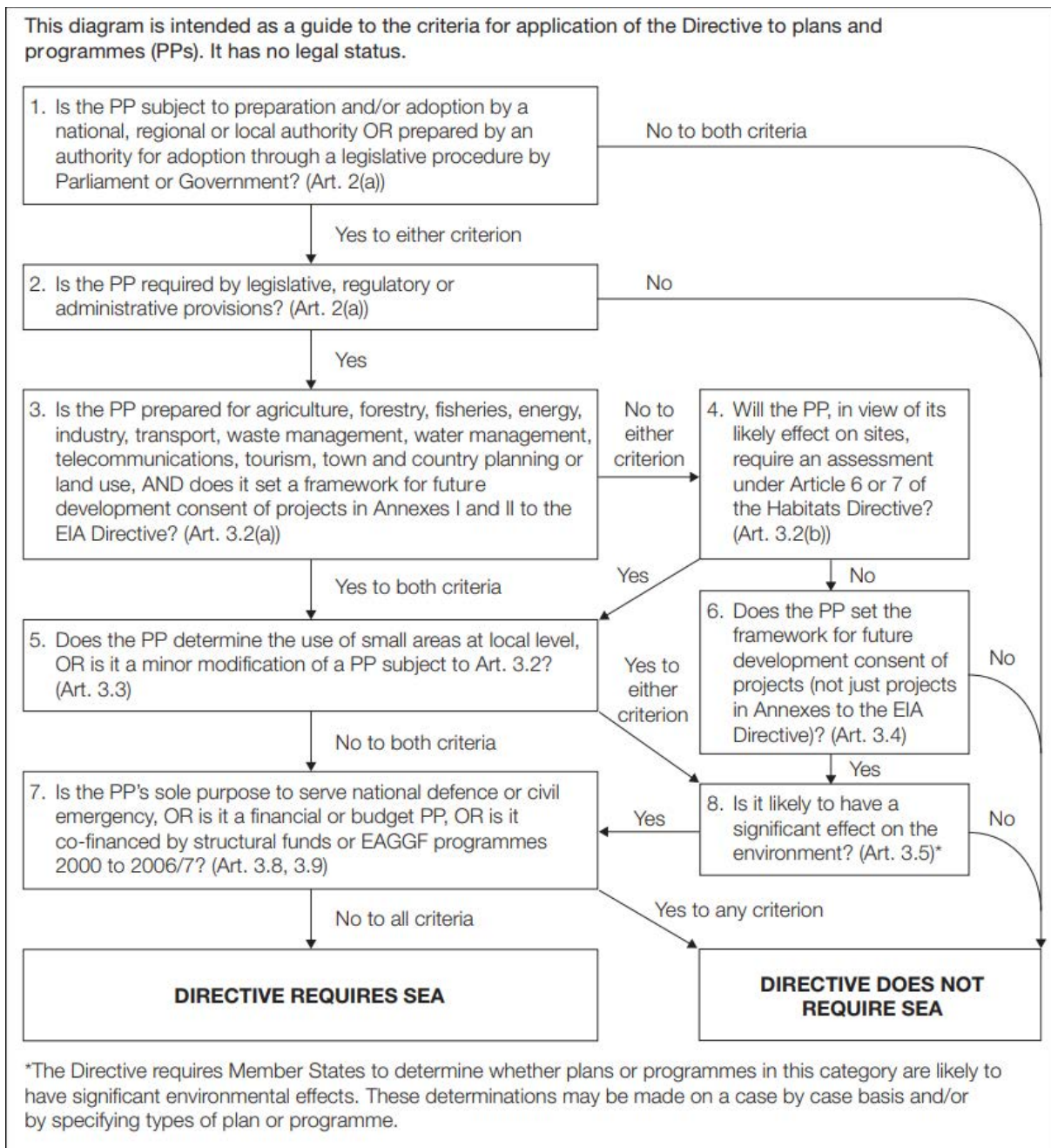
Screening Method

Figure 1 is sourced from 'A Practical Guide to the Strategic Environmental Assessment Directive' published by the Office of the Deputy Prime Minister in 2005⁴. It provides a flowchart guide to determining if a plan meets the criteria for requiring the application of SEA, as per the Directive. The series of questions in the flowchart are applied to the SPD in **Figure 2**.

SEA should be applied where a plan could result in significant effects on the environment. **Table 1** applies the various definitions, criteria and characteristics of a 'significant effect', as per the Directive, to determine if the Provision of Parking on New Developments SPD could potentially have such an effect.

⁴ Available at: [A Practical Guide to the Strategic Environmental Assessment Directive \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/111111) [Accessed: 28/02/23]

Figure 1: SEA Screening Guide⁵



⁵ Available at: [A Practical Guide to the Strategic Environmental Assessment Directive \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/67042/Practical_Guide_to_the_SEA_Directive.pdf) [Accessed: 28/02/23]

Figure 2: Applying the series of questions from Figure 1 to screen the Provision of Parking on New Developments SPD

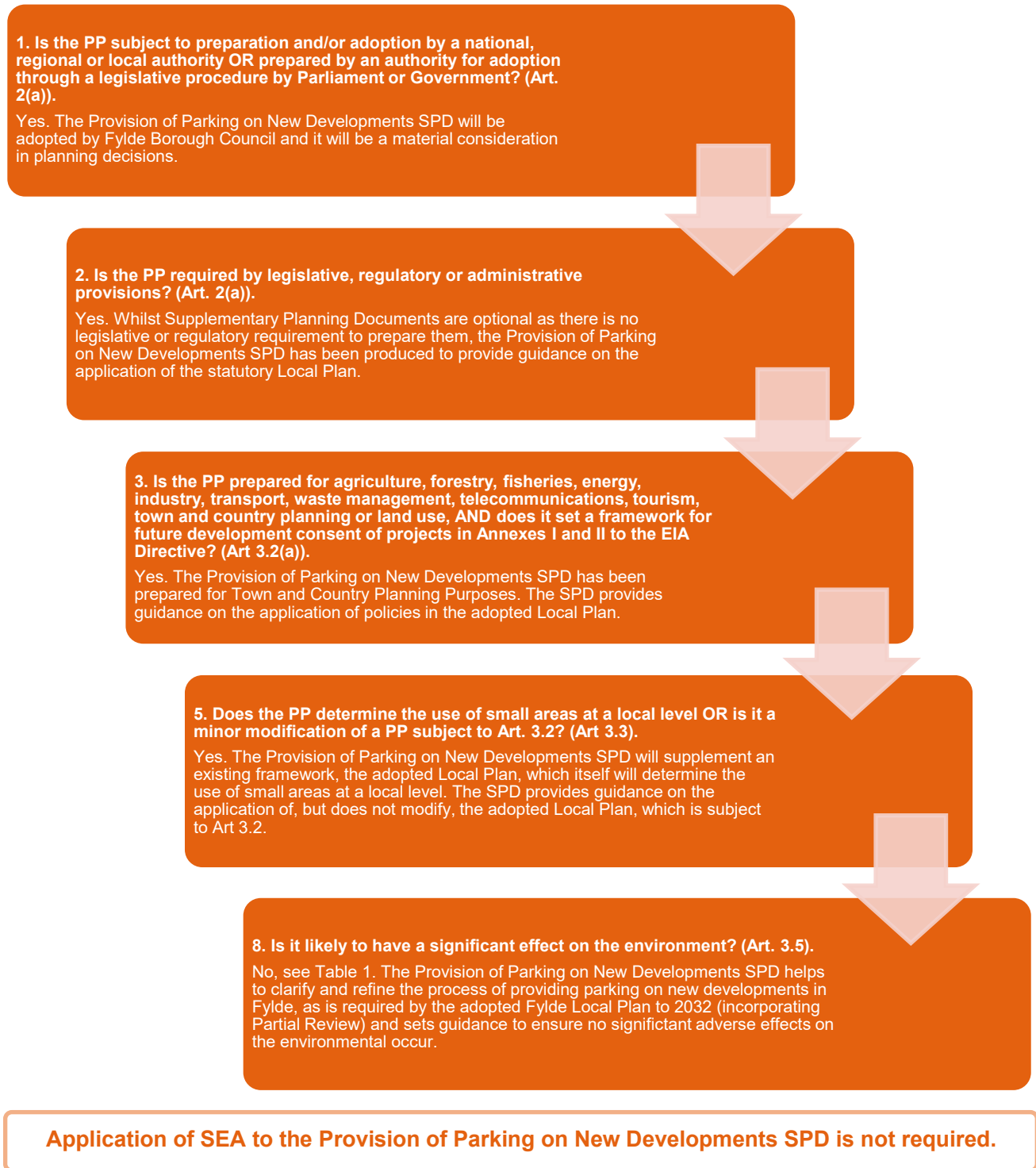


Table 1: Establishing whether the Fylde Provision of Parking on New Developments SPD could potentially have a likely significant effect (LSE) on the environment, in accordance with the criteria of a 'significant effect' per Schedule 1 of the SEA Regulations

SEA Regulations Criteria	Response	Is there an LSE?
1. Characteristics of plans and programmes, having regard, in particular, to:		
1a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	The Provision of Parking on New Developments SPD sits at the lowest tier of the development plan system. It offers specific guidance to implement Policy GD7 of the adopted Fylde Local Plan which places requirements on applicants regarding parking areas on layouts of development of which parking is a key component. It also specifically highlights the importance of highway safety, and the role that parking plays in maintaining it. It reinforces the requirements for non-motorised users to be prioritised. The SPD does not allocate for any specific land uses including land for car parking.	No
1b) The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.	The SPD is an implementation tool for delivering the adopted Fylde Local Plan. The SPD is influenced by other higher tier plans rather than influencing other plans itself. The guidance and policy of the SPD will not be in conflict with the National Planning Policy Framework (NPPF).	No
1c) The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	<p>The Provision of Parking on New Developments SPD sets out the standards for parking to assist decision making. It requires that local parking standards take account of accessibility, type/mix/use, public transport availability, local car ownership and need for electric vehicle charging points. The SPD also set out requirement for the parking of cycles, motorcycles, vehicles used by disabled people, mobility scooters, lorries and coaches. Fylde Council set out requirement of cycle storage for residential dwellings rather than parking, one cycle parking stand for every five car parking spaces should be delivered as per standards set out for commercial and community developments.</p> <p>The contents of the SPD will directly influence the amount of parking provided at new developments, and this will have implications for land use, drainage and runoff, with the potential to lead to environmental implications.</p> <p>In accordance with Local Plan Policy CL2, the Council will require that all newly laid parking areas are constructed using pervious paving, as described in Building Regulations, unless the applicant can demonstrate to the satisfaction of the Council and Lead Local Flood Authority that this is not possible.</p> <p>The Council will seek mitigation measures that promote choice of travel modes in line with national and local policy such as contribution towards higher frequencies of bus services or additional routes, the provision of works transport for employees etc.</p> <p>All developments that generate significant amounts of travel movement will require a Travel Plan that encourage the use of sustainable transport options, particularly active travel options, in order to lessen the impact of the development on the local highway network, including to reduce pressure on parking provision.</p>	No

SEA Regulations Criteria	Response	Is there an LSE?
1d) Environmental problems relevant to the plan or programme.	<p>The SPD parking standards are informed by accessibility, development type, car ownership levels and the need for charging infrastructure. The SPD identifies locations that are sufficiently accessible to lead to lower demand for parking which in turn can encourage the use of public transport and active travel.</p> <p>The SPD will provide further guidance to policies Fylde Local Plan including Policy T5 parking standards. The SPD will ensure developer and applicants develop schemes which provide sufficient vehicle parking, cycle parking, electric vehicle charging, and thereby support wider sustainable and safe transport objectives. As such, the SPD will encourage use of more sustainable modes of travel, thereby reducing the contribution of new development to the factors, such as greenhouse gas emissions from transport.</p>	No
1e) The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	<p>Due to the detailed nature of the Provision of Parking on New Developments SPD, it has no relevance to the implementation of community legislation on the environment, over and above that of the existing policies within the Fylde Local Plan.</p>	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a) The probability, duration, frequency and reversibility of the effects.	<p>Fylde Council set out parking standards. The standards set will be for the provision of the minimum number of parking spaces on a site. Table 2 of the SPD provides tabulated standards for a long list of possible land uses, with reductions in areas of good accessibility.</p> <p>The Council will also seek mitigation measures that promote choice of travel modes in line with national and Local Plan policy.</p> <p>In areas of high accessibility, the Council will apply separate standards, for certain uses, that distinguish between the requirements applied to new-build developments and those where existing buildings are converted for a new use.</p> <p>The Council considers that, for developments to comply with the design policies of the adopted Local Plan, the particular circumstances of the locality will need to be reflected in the parking standards that apply for the area.</p> <p>The Council will expect sufficient space dedicated to soft landscaping within the overall parking area so that overall appearance is attractive and that cars will not be visually prominent within the overall street scene from all main internal and external vantage points.</p> <p>The SPD also states that Council will require provision of the chosen cycle storage facility to be included as part of the planning application and its provision will be secured through a planning condition.</p> <p>The Council has proposed car and cycle parking standards as a tool to promote sustainability growth without increasing congestion. This will have a likely benefit on the wider health and wellbeing of the population. However, the SPD is intended to provide guidance on the implementation of existing policy only. As such, it will not have a significantly</p>	No

SEA Regulations Criteria	Response	Is there an LSE?
	greater impact than the existing policies within Fylde Local Plan and other relevant saved policies.	
2b) The cumulative nature of the effects.	There are not anticipated to be any cumulative effects arising from implementation of the SPD.	No
2c) The transboundary nature of the effects.	There are no anticipated transboundary effects.	No
2d) The risks to human health or the environment (e.g. due to accidents).	<p>There are not considered to be any risks to human health or the environment that will result from implementation of the SPD. The SPD encourages prioritisation of sustainable transportation modes and active travel to be over and above the standard requirements of policy. The SPD may have positive implications for health, through potential improvements to air quality, and positive implications for the environment through potential reduction in air pollutants and carbon emissions as it promotes use of active travel, public transport and electric vehicles over private car use, and the need for electric vehicle charging points.</p> <p>The framework states that the developments should prioritise pedestrians and cyclists and give access to public transport; should address the needs of the disabled; should create safe, secure and attractive places; should allow for the efficient delivery of goods, and access by service and emergency vehicles.</p>	No
2e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	The SPD is applicable to development within the whole of borough; however, it is intended to provide guidance on the implementation of existing policy only, and should have no greater impact than that of existing policies within the adopted Fylde Local Plan and relevant saved policies	No
2f) The value and vulnerability of the area likely to be affected due to <ul style="list-style-type: none"> (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use 	<p>The SPD is applicable to development within the whole of the borough. Throughout this area there a number of listed buildings that unlikely to be affected by this SPD. There are no Air Quality Management Areas within this area. The SPD could help to improve air quality of the area as it promotes use of active travel, public transport and electric vehicles over private car use. The SPD is intended to provide guidance on the implementation of existing policy only.</p> <p>The level of car parking provision could impact on the density of land uses. However, the SPD is intended to provide guidance on the implementation of existing policy only. As such, it will not have a significantly impact than the existing policies within the adopted Fylde Local Plan and associated saved policies.</p>	No
2g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	No relevance	No

Screening Decision

The screening has determined that the Provision of Parking on New Developments SPD does not meet the criteria for a plan that requires the application of SEA (**Figure 2**). The results presented in **Table 1** show that the SPD would also be unlikely to result in significant effects on the environment.

It is therefore concluded that SEA does not need to be applied to the Provision of Parking on New Developments SPD.

Consultation

This SEA Screening Report was issued for consultation with the three statutory bodies: Natural England, Environment Agency and Historic England. They all agreed that SEA would not be required for the Provision of Parking on New Developments SPD. Their responses can be found in Appendix A.

Appendix A

Consultation Responses



By Email: [REDACTED]

Our ref: PL00792863
Your ref:

Date: 24 April 2023

Dear [REDACTED]

Fylde Council Parking Provision SEA Screening

Thank you for your email dated 18 April 2023 regarding the proposed SPD SEA screening statement.

Historic England is the Government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

Historic England has produced a document, which you might find helpful in providing guidance on the effective assessment of the historic environment in Strategic Environmental Assessments. This can be found at <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>.

In terms of our area of interest, we would concur with your assessment that the document is unlikely to result in any significant environmental effects and will simply provide additional guidance on existing policies which have already been subject to a Sustainability Appraisal. As a result, we would endorse the conclusions that it is not necessary to undertake a Strategic Environmental Assessment of the document.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]

[REDACTED]

Historic Environment Planning Adviser (North West)
Historic England
Telephone: 0161 242 1423
e-mail: [REDACTED]



Good Morning, we were recently consulted by Arcadis on the SEA screening for Fylde Council's Parking Provision SPD and also the SEA screening for the draft Flooding, Water Management and SuDS SPD. **Item 8, Appendix 3** can confirm that we concur that additional SEA screening is not required for these two SPDs and we look forward to being consulted on the Flooding, Water Management and SuDS SPD in due course.

Best Regards




Sustainable Places Advisor, Environment Agency Cumbria and Lancashire

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DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
CHIEF FINANCIAL OFFICER	EXECUTIVE COMMITTEE	17 OCTOBER 2023	9

TIMETABLE FOR DEVELOPING BUDGET PROPOSALS 2024/25

PUBLIC ITEM

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

RELEVANT LEAD MEMBER

This item is within the remit of Lead Member for Finance and Resources (Councillor Ellie Gaunt).

PURPOSE OF THE REPORT

The council approves a budget setting timetable each year which complies with the budget and policy framework rules, statutory deadlines, and if possible, facilitates early billing for Council Tax.

Attached at Appendix A is a draft budget timetable for 2024/25 for consideration. The timetable may need further consideration if there are any significant changes, for example if the timetables of precepting authorities change.

RECOVERABILITY

This decision is recoverable under section 7 of part 3 of the constitution.

RECOMMENDATION

To adopt the timetable as shown at Appendix A for the budget setting process for 2024/25.

REPORT

1. INFORMATION

- 1.1 The setting of the composite Council Tax can only be agreed after Lancashire County Council, the Police and Crime Commissioner for Lancashire and the Lancashire Combined Fire Authority have arrived at their respective precept requirements. These "major preceptors" as they are known notify Fylde Council, in its capacity as a billing authority, of their precept requirements in order that Fylde can collect council tax on their behalf.
- 1.2 The statutory deadline by which all the precepting authorities have to determine their budget requirements for the forthcoming financial year is 28th February 2024. Currently the dates of the relevant meetings of each body are yet to be confirmed.
- 1.3 The timetable set out in Appendix A includes key budget decision dates and proposed timescales for a budget consultation process to be undertaken.
- 1.4 In light of the above it is proposed that if all information on precepts is available, the Budget decision for Fylde Council will be taken at Budget Council on 4th March 2024.

1.5 If the budget cannot be set and Council Tax charges determined by 4th March 2024, it is likely that a Council Tax instalment date of 1st April 2024 may not be achieved with a resultant financial loss to the Council. The statutory deadline to set the Council Tax amounts for 2024/25 is 10th March 2024. Failure to set a Council Tax by the deadline is likely to have a financial impact on the Council and will be in breach of the statutory process.

2 CONSULTATION

2.1 As in previous years there will be a period of consultation on budget proposals ahead of the annual council tax setting meeting, including with representatives of business rate payers as required by the Local Government Finance Act 1992. There should also be meaningful consultation with those people who may be affected by any proposals in particular where they involve the discontinuance of a service. Detailed or specific consultation may be part of a proposal and follow after an in-principle decision is made.

CORPORATE PRIORITIES	
Economy – To create a vibrant and healthy economy	✓
Environment – To deliver services customers expect	✓
Efficiency – By spending money in the most efficient way	✓
Tourism – To create a great place to live and visit	✓

IMPLICATIONS	
Finance	The financial implications are contained within the body of the report.
Legal	Timetable in place to ensure annual budget for 2024/25 is set with statutory and legislative guidelines
Community Safety	None arising from this report
Human Rights and Equalities	None arising from this report
Sustainability and Environmental Impact	None arising from this report
Health & Safety and Risk Management	None arising from this report

SUMMARY OF PREVIOUS DECISIONS
This is the first item that relates to the budget setting process for 2024/25 and marks the commencement of that process.

BACKGROUND PAPERS REVELANT TO THIS ITEM		
Name of document	Date	Where available for inspection
N/a		

LEAD AUTHOR	CONTACT DETAILS	DATE
Paul O'Donoghue Chief Financial Officer	01253 658566	October 2023

Attached documents

Appendix A - TIMETABLE FOR DEVELOPING BUDGET PROPOSALS 2024/25

TIMETABLE FOR DEVELOPING BUDGET PROPOSALS 2024/25

Meeting Dates	Detail
October 2023 – Feb 2024	Consideration of potential capital bids and revenue budget growth options by Leadership Board
Dec 2023 and Jan 2024 meetings	Consideration of draft capital bids and revenue budget options by Executive Committee
5 th Dec 2023	Executive Committee - Updated MTFS & Financial Forecast 2023/24 to 2027/28
18 th Dec 2023	Council - Updated MTFS & Financial Forecast 2023/24 to 2027/28
Nov 2023/Feb 2024	Independent Group Briefings
Nov 2023/Feb 2024	Budget consultation exercise with stakeholders, including Town & Parish Councils and Business Rate Payers
19 th Feb 2024	Executive Committee - Budget Proposals Meeting - expected publication date of Budget & Policy Proposals
4th Mar 2024	Budget Council Meeting
10 th Mar 2024	Statutory Deadline for Council to set Council Tax