



Partial Review of the Fylde Local Plan to 2032

Statement of Regulation 20 Consultation

(Regulation 22(1)(c)(v)) Statement)

October 2020

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1. Introduction

- 1.1 This document has been produced to provide a report and summary of the representations made in response to the Partial Review of the Fylde Local Plan to 2032 (FLP32) consultation. The report accompanies the Partial Review of the FLP32, along with all the other submission documents, at the submission of the plan to the Secretary of State for Examination in Public.
- 1.2 This document has been produced in accordance with, and to fulfil the requirements of, Regulation 22(1)(c)(v) of the Town and Country Planning (Local Planning) (England) Regulations 2012. The requirements are that, if representations were made pursuant to Regulation 20 (which they have), the prescribed documents that must be sent to the Secretary of State includes a statement setting out the number of representations made and a summary of the main issues raised in those recommendations. Separate documents are provided to fulfil the requirements of Regulation 22(1)(c)(i) to (iv) (the Statement of Regulation 18 Consultation) and of Regulation 22(1)(d) (the Copies of Regulation 20 Representations).
- 1.3 The consultation on the Partial Review of the Fylde Local Plan to 2032 was undertaken from 23 July 2020 until 5pm on 3 September 2020. Letters or emails were sent to everyone on the Planning Policy consultation database, a list of more than 1100 organisations and individuals. A formal public notice was placed in The Lytham St. Annes Express. The documents were made available on the Council's website. The COVID-19 situation made certain types of consultation impossible. The documents were made available in paper form by appointment at the Town Hall, and arrangements were offered to make documents available to people shielding. Documents used in the consultation are reproduced in Appendix 1.
- 1.4 The previous round of consultation is described in the Statement of Regulation 18 Consultation, which is also included in the submission documents along with this document, and fulfils the requirements of Regulation 22(1)(c)(i) to (iv) of the 2012 Regulations.
- 1.5 The results of the consultation are set out in the following sections. The complete representations are provided in the separate Copies of Regulation 20 Representations document, and are also reproduced with the full text by policy in the Text of Representations Made Under Regulation 20 in Policy Order document.

2. Representations: summary data

- 2.1 The total number of representations received pursuant to Regulation 20 was **27**.
- 2.2 The representations were from: 1 council, 1 parish council, 10 statutory bodies, 13 agents/landowners/developers, 1 other group and 1 individual.

3. Summary by policy with Council response

- 3.1 The table that follows sets out a summary of the representations received, divided in accordance with the policy or paragraph number where these have been specified by the respondent. Where these have not been specified, the Council has judged which is the most appropriate policy or paragraph under which to display the content. The Council's brief response is set out in the right-hand column as appropriate. The Council reserves the right to expand further on the points made in the Examination.
- 3.2 Content received which does not relate directly to the proposed revisions set out within the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 is not included in the summary but is reproduced in full in the Text of Representations Made Under Regulation 20 in Policy Order document that also accompanies the submission.

Respondent	Summary of comment	Council response
Non-specific comments		
Highways England	No comment on the Partial Review	Comment noted
Network Rail	No comment on the Partial Review	Comment noted
Canal & River Trust	Comment only on Policy GD7 [see relevant section], nothing further	Comment noted
Natural England	No objection to the Schedule of Revisions	Comment noted
Historic England	No comment on the Partial Review	Comment noted
Story Homes	Process of Partial Review supported as aligns local and national policy; supportive on the whole of the revisions made	Support welcomed
Wyre Council	Response should be read alongside the pre-consultation response of 6 th March 2020.	Noted. The 6 th March 2020 letter from Wyre Council, and Fylde Council's response to it of 24 th March 2020, are attached as appendices to this report.
Avison Young for National Grid	No comments on the consultation	Comment noted
Homes England	Does not wish to make any representations on the Partial Review	Comment noted
Environment Agency	Insofar as it relates to our remit, we are satisfied with the proposed revisions. We have no further comments to make	Comment noted
Bryning-with-Warton Parish Council	Concerned that the Partial Review will not be rendered obsolete by White Paper proposals	Comment noted
Sport England	Recognises narrow scope of Partial Review, would welcome engagement with the Council regarding its evidence base.	Comment noted. The evidence base related to sport and recreation is not considered to be material to the revisions proposed.

Respondent	Summary of comment	Council response
David Eaves	<p>Partial Review should not to be changed as and when a developer needs to. The Council seem to put developers before the community, ie building on a zone 3 flood plain site, example Bambers Lane /School Rd.</p> <p>Is it not time The Secretary of State stopped building on flood plains. It is only the people who buy these properties that suffer NOT the developer. Maybe the council and Secretary of State should listen to the Environment Agency and other experts.</p> <p>Is it not time that money should be spent on the existing infrastructure by developers and Council alike.</p> <p>I have lived in Fylde Borough over 60 years and have no confidence in the Council and especially the Planning department. We have aired our grievances but as usual nothing will happen.</p>	<p>The response is a reference to an allocated site, where a reassessment of flood risk by the Environment Agency has reclassified part of the site as flood zone 3, owing to the need for improved infrastructure. The matter is being negotiated between the developer, the Council and the Environment Agency.</p>
Gladman Developments	<p>Notes the consultation on the White Paper.</p> <p>Question the process by which the Local Plan review has been undertaken; accept Regulation 18 consultation provided fair opportunity; but current Regulation 19 consultation is first occasion that allows full review and comment on proposals; progressing Partial Review without exploring important issues.</p> <p>Question lack of alignment with Wyre partial review, unmet needs not resolved</p> <p>Compelling reasons to plan for a higher housing target than the standard method</p> <p>Further sustainable housing sites should be sought to pre-empt above issues</p> <p>The Council should be mindful of changes proposed as part of the Changes to the Current Planning System consultation and the White Paper</p>	<p>Comment noted</p> <p>There is no requirement in the Regulations for draft versions to be prior circulated or for successive consultations to be undertaken. The process followed is fully in accord with the Regulations.</p> <p>Unmet needs in Wyre are addressed primarily by their own policy LPR1.</p> <p>See full response in relevant section</p> <p>The Partial Review does not result in the need to allocate additional sites</p> <p>The Council has considered these matters in bringing forward the Partial Review.</p>
Cassidy & Ashton for Home Farm	<p>As a general comment, we object to the lack of aspiration in the local plan review; provides opportunity to increase contribution to “build, build, build” agenda but fails to do so</p>	<p>The Partial Review will provide for housing needs set out in national policy, but retains all allocations in the Local Plan despite the reduced need figure: this is not a “lack of aspiration”.</p>

Respondent	Summary of comment	Council response
Pegasus Group for Hallam Land Management Ltd	Far from clear in the main consultation document (SDPR01) or on the Council's website and notification emails that this is Reg 19 consultation stage; Council should consider a further consultation period to ensure a robust consultation process, otherwise the plan could be challengeable	The Council disagrees with this assessment. Consultation materials are provided for reference as Appendix 1 to this document.
Sustainability Appraisal and Strategic Environmental Assessment		
Natural England	Concur with the conclusions of the Sustainability Appraisal and Strategic Environmental Assessment	Comment noted
Pegasus Group for Hallam Land Management	Recognise that it is not always necessary to test all possible alternative approaches, instead focusing on those that considered to be 'reasonable alternatives', but question the basis on which the conclusion of "no reasonable alternatives" has been reached; would have been a reasonable alternative to consider an increased level of housing provision as part of the SA/SEA process.	The Council disagrees. An increased level of housing provision would have been outside the scope of the Partial Review.
Habitats Regulations Assessment Screening Report		
Natural England	Concur with the conclusions of the Habitats Regulations Assessment Screening Report.	Comment noted
Economic Viability Assessment Review 2020		
	No representations received in relation to this section	
Draft Statement of Common Ground		
Wyre Council	Cooperation has been positive, ongoing and constructive and has resulted in some changes to the documents concerned; particularly the Statement of Common Ground (SoCG).	Comment welcomed
Emery Planning for Wainhomes North West	Wyre Council sent a letter to Fylde Council dated 6 March 2020 which does not support Fylde's assessment of its housing need as a standalone issue; it states that matters of housing need would most comprehensively be dealt with jointly between the respective authorities, and it is the view of Wyre Council that the authorities should work together to identify where unmet housing need should be	This representation misrepresents the letter from Wyre Council (Appendix 2 of this document), which at no point proposes a joint plan review. What it proposes is the production of joint evidence, firstly in respect of a housing needs assessment, and secondly the review of transport and highways infrastructure. Those evidence reviews are

Respondent	Summary of comment	Council response
	<p>accommodated; it states that the plan processes of the two councils need to be properly aligned in order to accommodate this.</p> <p>Therefore Fylde Council should conduct a joint plan review with Wyre Council; standalone review not justified.</p> <p>In proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate</p>	<p>both required for Wyre by its adopted Policy LPR1. Fylde Council responded in its letter attached as Appendix 3 of this document.</p> <p>The Council disagrees with this assessment. There is no duty to agree in the Duty to Co-Operate</p>
Gladman Developments	<p>Welcome the willingness to address the issue of unmet housing needs through the councils respective Partial Review processes, but have significant concerns about how this matter is being dealt with in practice</p> <p>Question whether appropriate to undertake Partial Review before any unmet needs arising from Wyre's concurrent review exercise have been correctly identified; progressing risks leading to the same situation that arose during the preparation and examination of the authorities' current Local Plans.</p> <p>Housing Needs and Requirement Background Paper makes the assumption in Table 3 that Wyre Borough Council will be planning for a local housing need figure of 308 dpa through their own Partial Review exercise, and that as this figure is lower than the authority's adopted housing target of 460 dpa, there will be no unmet need that must be accommodated in the Fylde Borough area.</p> <p>Although the Council have indicated a willingness to accommodate any unmet needs arising from Wyre within the Fylde borough area, this appears to be on the assumption that that it will be appropriate to reduce the Council's own housing target, and any need can be met through existing Local Plan: we object to this proposal: other councils and Fylde will have to reassess with new standard method: should plan for higher requirement now on the basis of no reduction to requirement, allocate additional sites</p>	<p>The Council has a requirement to review following the Wyre Local Plan adoption with unmet need. The Council cannot rely on the progress of the Wyre Partial Review, which will be entirely a matter for Wyre Council. The Partial Review provides a contingency on the outcome.</p> <p>Neither the background paper nor the Partial Review make this assumption. The calculation is provided as an illustration.</p> <p>The missing element of the representor's argument is Wyre's Policy LPR1, which requires Wyre Council to immediately review with the objective of itself meeting its needs.</p> <p>The Partial Review can provide a contingency for unmet need should any remain following Wyre Council's review</p> <p>For issues regarding housing needs and requirement see the relevant sections</p>
Emery Planning for Hollins Strategic Land	<p>Wyre Council sent a letter to Fylde Council dated 6 March 2020 which does not support Fylde's assessment of its housing need as a standalone issue; it states that matters of housing need would most comprehensively be dealt with jointly between the respective authorities, and it is the view of Wyre Council that the authorities</p>	<p>This representation misrepresents the letter from Wyre Council (Appendix 2 of this document), which at no point proposes a joint plan review. What it proposes is the production of joint evidence, firstly in respect of a housing</p>

Respondent	Summary of comment	Council response
	<p>should work together to identify where unmet housing need should be accommodated; it states that the plan processes of the two councils need to be properly aligned in order to accommodate this.</p> <p>Therefore Fylde Council should conduct a joint plan review with Wyre Council; standalone review not justified.</p> <p>In proceeding with the Partial Review despite the written request of Wyre Council to align their respective plan-making timescales and undertake a cross-boundary assessment of housing need, Fylde Council has not complied with the Duty to Cooperate</p>	<p>needs assessment, and secondly the review of transport and highways infrastructure. Those evidence reviews are both required for Wyre by its adopted Policy LPR1. Fylde Council responded in its letter attached as Appendix 3 of this document.</p> <p>The Council disagrees with this assessment. There is no duty to agree in the Duty to Co-Operate</p>
Pegasus Group for Hallam Land Management Ltd	Question the status of the Draft Statement of Common Ground: unclear as to the level of buy-in from other authorities	The Statement of Common Ground has been circulated to the authorities concerned. Amendments were made to earlier iterations following engagement with officers of the other authorities, to reach the version submitted. Wyre Council acknowledge the co-operation in their representation, and no authority has objected to its contents as published
Health Impact Assessment Screening		
	No representations received in relation to this section	
Schedule of Evidence		
Sport England	Schedule of evidence/ updates suggest that the Playing Pitch Strategy does not need updating as it doesn't relate to the policy changes being suggested and therefore does not fall within the remit of this partial review. Whilst this is the case noted that the Playing Pitch Strategy is from April 2016; as a guide, Sport England consider out of date after 3 years; therefore advise update of evidence base.	Comment noted. This advice is not considered to impact on the Partial Review.
Paragraph 1.3: 2019 Framework		
	No representations received in relation to this section	

Respondent	Summary of comment	Council response
Paragraph 1.4: Introduction to the Partial Review		
Emery Planning for Wainhomes North West Ltd	Neither of the two reasons justify the Partial Review as drafted and it should therefore be withdrawn. No justification in the Framework or the PPG for an early plan review based on a lower housing requirement than adopted policy; proceeding despite request from Wyre to align is breach of Duty to Co-Operate; premature to proceed in light of emerging national policy	Both of the reasons are genuine triggers that require the Council to conduct its Partial Review. The Council may, however, review its plan if it sees fit, in any case.
Savills for Fylde Coast Care Village Ltd	It is widely accepted that there is a chronic shortage of housing in the UK. The revised NPPF seeks to address the housing crisis, focusing policies on increasing housing provision in all areas. The NPPF has a strong emphasis on the need to significantly boost the supply of housing across the UK	Comment noted. The Partial Review supports the FLP32 objective to fulfil housing needs, and to ensure compliance with NPPF19.
Emery Planning for Hollins Strategic Land	Neither of the two reasons justify the Partial Review as drafted and it should therefore be withdrawn. No justification in the Framework or the PPG for an early plan review based on a lower housing requirement than adopted policy; proceeding despite request from Wyre to align is breach of Duty to Co-Operate; premature to proceed in light of emerging national policy	Both of the reasons are genuine triggers that require the Council to conduct its Partial Review. The Council may, however, review its plan if it sees fit, in any case.
Pegasus Group for Hallam Land Management Ltd	Draws attention to emerging reforms of White Paper: proposes a statutory duty for Councils to have a new Local Plan in place within 30 months (2.5 years) of the legislation coming in, i.e. by mid-2023; or 42 months if their current plan was adopted within the last 3 years (as Fylde's is), i.e. by mid-2024; would seem prudent for Fylde to take account of the proposed changes now and begin a more formal Review; as is would not remain in place for 5 years.	The Council have restricted the scope of the Partial Review in full recognition that a more comprehensive review will be required to follow, whatever the legislative background.
Paragraph 1.5: Sustainable Development		
	No representations received in relation to this section	
Paragraph 1.9: Neighbourhood Development Plans		
	No representations received in relation to this section	

Respondent	Summary of comment	Council response
Paragraph 1.15: Duty to Co-Operate		
	No representations received in relation to this section	
Paragraph 1.16: Statements of Common Ground		
	No representations received in relation to this section	
Paragraph 1.18 Strategic Priorities		
	No representations received in relation to this section	
Paragraph 1.24: Review Mechanism if Unmet Need, also box setting out previous text		
Bryning-with-Warton Parish Council	each and every City, Town and Parish will be struggling to meet the assessed need of housing in their communities and to place this burden on neighbouring council's is incredulous to say the least. Fylde Council should not be placed in this unenviable position and Wyre Council should be addressing their shortfall with the Government	Comment noted. Wyre Local Plan Policy LPR1 places the onus on Wyre Council to address their needs in the first instance
Paragraph 1.25: Wyre Local Plan adopted with shortfall		
Wyre Council	The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy LPR1, the contents of which are incontestable common ground and the confirmation of un-met housing need within Wyre, is again incontestable common ground. This un-met need provides (in part) the justification for the review of the Fylde Local Plan to 2032 and a strong link between our two plans and their subsequent review.	Comment noted. These facts are set out clearly in the Partial Review
Emery Planning for Wainhomes North West Ltd	Wyre Local Plan was adopted on 28 February 2019 and identifies the OAN for Wyre to be 479 dwellings per annum, equating to 9,580 over the plan period to 2031. Policy SP1 of the Plan states that it will deliver a minimum of 9,200 dwellings, which equates to 460 dwellings per annum. This results in a shortfall of 380 dwellings. The adoption of the Wyre Local Plan with this shortfall triggers the early review mechanism contained within paragraph 1.27 of the adopted Fylde Local Plan.	Comment noted: provides additional clarification beyond Partial Review text. See also Housing Needs and Requirement Background Paper

Respondent	Summary of comment	Council response
Emery Planning for Hollins Strategic Land	Wyre Local Plan was adopted on 28 February 2019 and identifies the OAN for Wyre to be 479 dwellings per annum, equating to 9,580 over the plan period to 2031. Policy SP1 of the Plan states that it will deliver a minimum of 9,200 dwellings, which equates to 460 dwellings per annum. This results in a shortfall of 380 dwellings. The adoption of the Wyre Local Plan with this shortfall triggers the early review mechanism contained within paragraph 1.27 of the adopted Fylde Local Plan	See above
Paragraph 1.26: Wyre's requirement for Partial Review through Wyre Local Plan Policy LPR1		
Story Homes	Concerned about the assumptions made by Fylde Council with regard to Wyre Council meeting their own shortfall. It is considered that additional robust evidence is required to ensure this shortfall will be met within Wyre	Wyre Council will produce evidence in relation to its own Policy LPR1 for its review. The Partial Review does not assume the outcome; it provides a backstop position should needs remain unmet
Wyre Council	<p>Policy LRP1 sets out the steps that need to be undertaken as part of Wyre's Local Plan review in order to ascertain what proportion (if any) of the unmet need can be accommodated in Wyre. As set out above, Fylde's Local Plan review is justified in part by a commitment by Fylde to assisting Wyre meet its residual unmet need.</p> <p>For the avoidance of doubt the full OAN for housing in Wyre is 479 dpa, with the WLP31 providing only 460 dpa; thus establishing the un-met housing need as a matter of recently adopted policy. The housing requirement for Wyre can only be changed through the adoption of a reviewed local plan or through an entirely new local plan. Although the Government has introduced a Standard Method (SM) for the calculation of housing need, this is a starting point and it cannot be assumed that this will represent the final position for Wyre.</p> <p>I also wish to draw your attention to the fact that it cannot be assumed that Wyre Council, through the partial review process, will be able to meet its housing needs in full within the Borough. The Inspector's Report into Wyre's Local Plan made it clear that further consideration needed to be given as to the extent to which any unmet need could be met in Wyre through a review of transport and highway issues. This is reflected in LRP1 (2). Until detailed consideration has been given to this issue through the review process, it has not been established that Wyre can meet any unmet needs within the Borough.</p> <p>Finally, I note from the governments recently published 'Planning for the Future' white paper that a number of fundamental planning reforms are proposed which may</p>	<p>This is recognised; however, the Wyre Local Plan includes its own immediate review trigger, which requires housing need to be reassessed.</p> <p>Wyre's policy LPR1 and the Inspector's report make clear that the objective of Wyre's partial review must be to meet the OAN within the plan period</p>

Respondent	Summary of comment	Council response
	have consequences for the local plan process. This may have implications for how both authorities proceed with their respective local plan partial reviews.	It is acknowledged that Wyre Council will wish to consider how it goes forward
Turley for Strategic Land Group	<p>Partial Review notes that the SM housing need figure for Wyre means that, in effect, there is no unmet need arising in Wyre. As such, the Partial Review does not propose any increase in the housing requirement to accommodate any shortfall from Wyre. However, as with the situation in Fylde, the adoption of the SM figure as a housing requirement for Wyre would be incompatible with that Borough's growth plans, such that the adopted requirement figure for Wyre remains sound.</p> <p>It is therefore misleading and inaccurate to now state that there is no unmet need within Wyre. SLG considers that the unmet need previously identified remains relevant and should be accommodated in Fylde, unless Wyre's own review can accommodate it first.</p> <p>Notes impact of proposed revised standard method on the housing market area: would result in a need for 1,173 dpa in total, including 488 in Fylde</p>	<p>Wyre Policy LPR1 requires Wyre Council to review, to include an updated assessment of housing needs. Whether there remains unmet need in Wyre will depend on that assessment. The Council agrees that Wyre's own review should seek to accommodate any remaining need first, as required by the Wyre Local Plan Policy LPR1.</p> <p>The calculation for the current year for Wyre for the draft revised standard method gives a figure of 383 dpa, which if adopted by Wyre Council would leave no unmet need</p>
Lichfields for Taylor Wimpey	Not yet clear what housing requirement figure Wyre will pursue in their Partial Review going forward; not clear if Wyre Council will continue with the Partial Review in light of the potential changes to the planning system; seems contradictory for Fylde Council to continue with it's Partial Review, to meet Wyre's unmet housing requirement given the uncertainty surrounding what Wyre's unmet housing need will be	The Partial Review is required by the FLP32. The Partial Review provides a contingency on the outcome of Wyre Council's review.
Paragraph 1.27: conclusion on Wyre's unmet need and Partial Review		
Home Builders Federation	No evidence available at present to demonstrate that Wyre can meet the housing need within their own area	The Wyre Local Plan was adopted with unmet need but also a review mechanism that seeks to meet those needs. This was required as the evidence base for the Wyre Local Plan had not demonstrated that the unmet need could not be met in Wyre.

Respondent	Summary of comment	Council response
Emery Planning for Wainhomes North West Ltd	Paragraph 1.27 of the Schedule of Revisions therefore states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre. Therefore, at present, there is no need for Reason 2 (above) of the plan review	The requirement in the FLP32 is for the Partial Review to examine the issue. This it has done. The Partial Review was a requirement of the FLP32 in the event that the Wyre Local Plan was adopted with unmet need. The Partial Review is required in consequence of this.
Gladman Developments	<p>Lack of clarity regarding the issue of unmet needs; Partial Review notes that will be for Wyre's Partial Review to determine how and whether unmet need will be met in Wyre; assumption that when based on the current Standard Method a) Wyre will be able to meet its housing needs in full, and b) any potential unmet need arising from Wyre could can be accommodated in Fylde's revised housing target of 275 - 415 dpa; but level of unmet need will only be confirmed when Wyre's Partial Review is further advanced; and object to soundness of the 275-415 figure.</p> <p>To respond to housing shortfalls from adjoining authorities and future increases in Fylde's housing needs, Council should allocate additional housing sites, on the basis of no reduction to the housing target, to provide greater flexibility in housing land supply</p>	<p>The Partial Review makes no assumptions as to the outcome of Wyre Council's review. It points out that, as the representor acknowledges, it will be for Wyre Council's review under its Policy LPR1 to determine how the need will be met in the first instance. The Partial Review provides a backstop position to ensure that unmet needs are met in the housing market area, if remaining following Wyre Council's review.</p> <p>Allocation of additional housing sites is not required by the Partial Review.</p>
Emery Planning for Hollins Strategic Land	Paragraph 1.27 of the Schedule of Revisions therefore states that the Partial Review of the Fylde Local Plan has not needed to incorporate alterations to its housing needs or requirement figures following consideration of the issue of housing need in Wyre. Therefore, at present, there is no need for Reason 2 (above) of the plan review	The requirement in the FLP32 is for the Partial Review to examine the issue. This it has done. The Partial Review was a requirement of the FLP32 in the event that the Wyre Local Plan was adopted with unmet need. The Partial Review is required in consequence of this.
Cassidy & Ashton for Home Farm	Issue has been continually pushed into the long grass; Council's position at Examination was that because Fylde were ahead of Wyre in the Plan cycle it was not possible to estimate an accurate requirement of Wyre's unmet need and therefore it was appropriate to adopt the plan and address the issue through a partial review. Since then, Wyre have adopted their plan and identified a shortfall of 380 dwellings which they intend to address through their own partial review, ideally within their own Borough, but as Fylde acknowledge in this partial review, it may be necessary for this to catered for in Fylde; vague comments that the flexible housing requirement of 275-415 dwellings will allow for this; actually not being addressed and conceivably could continue; unlikely ever to be synchronised; totally at odds with the planned	<p>Wyre's Local Plan Policy LPR1 was added by modification to the submitted plan on the recommendation of the Inspector, as Wyre Council had not demonstrated that the shortfall in housing provision in the Wyre Local Plan could not be met. The Inspector would not have required this modification if he had believed that Wyre Council had demonstrated that it was unable to meet its needs</p> <p>Wyre's review in accordance with Policy LPR1 will address the matter in the first instance. The Partial Review provides</p>

Respondent	Summary of comment	Council response
	approach and the duty to cooperate; Fylde should address this matter now, once and for all and identify additional land specially to cater for Wyre's unmet need.	a backstop position. Allocation of additional land by the Partial Review is unnecessary.
Pegasus Group for Hallam Land Management Ltd	Council propose the same approach [for assessing housing needs] for rest of HMA, using the standard method target (which for Wyre drops from 460 dpa in the adopted plan to 308 dpa and for Blackpool from 280 dpa to 114 dpa). They again argue that there are no exceptional circumstances to depart from this, again using the rationale that the standard method has a similar basis to the adopted requirements from the 2014 Fylde Coast SHMA (all 3 authorities used were subject to the same approach given they are all in one HMA); leads to a 40% reduction for Fylde Coast from 1,155 dpa to 697 dpa; on this basis Fylde argue that there is no longer any unmet need in Wyre (or the wider HMA) and therefore no need for Fylde or Wyre to allocate any additional sites. Instead Fylde propose to soften their requirement by introducing a range as set out above.	The Council do not "propose" this. The assessment of local housing need figures is for the respective authorities, at the time of plan preparation. It will be for Wyre Council to make its assessment of need as part of the preparation process of its own review in accordance with Wyre Local Plan Policy LPR1. The illustrative calculations in the Housing Needs and Requirement Background Paper provide context.
Paragraph 1.28: tests of soundness		
	No representations received in relation to this section	
Paragraph 1.40: existing paragraphs consolidated		
	No representations received in relation to this section	
Paragraph 1.41: Partial Review preparation		
	No representations received in relation to this section	
Paragraph 1.42: evidence		
Cassidy & Ashton for Home Farm	Requirement to rely on up to date information; current global pandemic has had an unknown impact upon the development industry; acknowledged, but inappropriate not to take this into account. It is therefore essential that this data is continually updated to take the effects of the pandemic into account	The trajectories provided in the Five Year Housing Land Supply Draft Position Statement are adjusted for the impact of the initial lockdown. The Council will continue to monitor the impacts on delivery in line with its adopted Monitoring Framework in the FLP32

Respondent	Summary of comment	Council response
Paragraph 1.44: technical assessments		
	No representations received in relation to this section	
Cross-cutting themes: equality		
	No representations received in relation to this section	
Cross-cutting themes: viability		
Bryning-with-Warton Parish Council	<p>'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan. So it's okay to have policies but it's just they must not stop deliverability of the plan? 'Defeats the purpose of having a policy then doesn't it?</p> <p>'Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.' Surely if the cumulative cost of a sustainable development is not viable it undermines deliverability of the plan?</p>	The proposed revision quotes from national policy and guidance. The revision will ensure the Local Plan accords with up-to-date national policy.
Paragraph 3.4: 12 core principles		
	No representations received in relation to this section	
Policy DLF1		
Story Homes	Use of a housing requirement range can be seen as ambiguous; risk that the Council aim for the lower end of the range, as opposed to the higher figure as previously published; housing requirement should be viewed as a minimum figure with which the Council should aim towards and improve upon. This is echoed in Central Governments intentions; use of a range implies not only a minimum target but also a ceiling to development; therefore range should be removed, with housing requirement clearly stated as a minimum figure	The site allocation policies of the FLP32 are not altered, a strategy supported by retaining 415 dpa as the upper end of the range, whilst the lower end recognises the assessment of local housing need in line with the Framework and PPG. The upper end of the range is not a ceiling, and in no part of the text of the proposed revisions is any suggestion that it is.

Respondent	Summary of comment	Council response
	Notes proposed change to standard method calculation; Fylde's housing requirement increases from 415 dpa to 488 dpa, although this methodology will not be incorporated into the partial review it provides a clear indication of future projected growth for Fylde. Additionally, the LHN for Wyre increases from 296 dpa to 383 dpa under the revised Standard method. This may present a future scenario where Fylde is required to meet Wyre's unmet need	The draft revised standard method is not at present government policy, and what the final form of the calculation will be is unclear. Using the draft revised standard method at 383 dpa, the Wyre Local Plan would meet its needs and would therefore not result in unmet need
Lichfields for Taylor Wimpey	Proposed only to amend the housing requirement but does not seek to consider the impact on employment land requirement this may inadvertently have; could result in a promotion of unsustainable commuting; in conflict with the central tenet of the Framework	The employment land requirement is based on past take-up, with land provided in addition to meet unmet need in Blackpool. It is not considered necessary to revisit this element of the plan given that the upper end of the housing requirement range remains unchanged.
Home Builders' Federation	Proposed to amend this policy to state that the 'Local Plan will provide sites for a minimum of 6,895-8,715 new homes: does not provide a clearly written and unambiguous policy and is therefore not consistent with national policy; unclear how this should be considered as part of the decision-making process Not clear whether the figure is a net figure or not Concerned by the use of a housing range, which although the text still states 'a minimum of', still seems to suggest that the top end of the range is a cap and this could limit the development of homes; not in line with national policy Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It is also noted that the Government is committed to ensuring that more homes are built; may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates; have been significant infrastructure improvements in Fylde and the surrounding area, for example the Preston Western Distributor and the A585 Windy Harbour to Skippool improvement scheme.	The Council disagrees. The policy is entirely clear Policy H1 clarifies in the annualised figure that the requirement is net The upper end of the range is not a cap, and in no part of the text of the proposed revisions is any suggestion that it is. The housing requirement is sound as it meets needs, which are identified in accordance with national policy. The Preston Western Distributor Road allowed for the level of development allocated in the FLP32. It does not however provide " <i>improvements that are likely to drive an increase in the homes needed locally</i> " as the example in PPG envisages, in the strategic locations for development in the Borough The A585 Windy Harbour to Skippool improvement, although located mostly in the Borough has the effect of improving access to and from peninsular Wyre to the rest of the region. It is not likely to drive an increase in the homes needed locally within Fylde.

Respondent	Summary of comment	Council response
	<p>Fylde, Wyre and Blackpool form a single housing market area (HMA); shortfall of homes within the HMA of 380 dwellings; draft Statement of Common Ground contains areas of disagreement</p> <p>1,926 dwellings have been built over the last five years, at an average of 385dpa, with the numbers increasing year on year, this suggests that the housing need is above the LHN identified by the standard method</p> <p>SHMA Addendum 3 identifies an OAN of between 410-430dpa; Inspector considered that a housing requirement of 415dpa was sound; suggest the housing need is higher than the LHN identified by the standard method</p> <p>Proposed revised standard method produces a minimum figure of 488 dpa for Fylde; Wyre's also increases to 383 dpa, , which could increase the necessity for Fylde to meet their unmet need</p> <p>Concerned that this does not provide a 15-year period from adoption and will at best only look forward 11 years. This would be contrary to the NPPF</p>	<p>The issue of Wyre's unmet need is dealt with under paragraphs 1.24 – 1.27. The Partial Review provides a backstop position.</p> <p>The higher levels of completions have been necessary to make up for shortfall against what was already an increased level of needs in the early part of the plan period: they do not themselves justify a further increase</p> <p>The SHMA utilised the methodology contained in the former PPG and which is now out-of-date. The standard method identifies housing need in accordance with national policy.</p> <p>383 dpa for Wyre would be below the housing provision in the adopted Wyre Local Plan (460 dpa)</p> <p>As a Partial Review intended to update policies to accord with national policy and deal with the matter of unmet need previously held in abeyance, it is not appropriate and beyond its scope to be treated as a full review that would extend the plan period.</p>
Emery Planning for Wainhomes North West Ltd	<p>National policy does not support a plan review based on a lower Local Housing Need identified by the standard method to that in the adopted Local Plan. Para 33 of the Framework advises review in less than the statutory minimum is necessary when local housing need figure has changed significantly; PPG clarifies this is where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method; no justification in the Framework or the PPG for an early plan review based on the adopted housing requirement being higher than the requirement generated by the standard method. In that context a revision through this Partial Review to reduce the housing requirement of 415 dwellings per annum to 275 dwellings per annum has no support in the Framework or PPG. Therefore, on this reason alone the Partial Review is not entitled to review the requirement in Policy H1.</p>	<p>The Council is entitled to review its plan when and for whatever reason it sees fit</p> <p>These are particular triggers when a review is needed. They do not preclude review in other circumstances</p> <p>The Partial Review does not reduce the housing requirement. It introduces a range</p>

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	<p>To establish the overall housing need it is necessary to apply the standard method unless exceptional circumstances justify an alternative. A hyperlink then takes the reader to the section titled "Housing and economic needs assessment - Guides councils in how to assess their housing needs". The LPA has undertaken the standard method as set out in the PPG.</p> <p>However paragraph 010 notes there may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. SHMA identified an annual net need of 207 affordable homes per annum. Using the standard method after applying the affordability ratio the housing figure increased from 253 to 275 dwellings, an increase of 22 dwellings. This is some 10% of the actual affordable need identified in the SHMA. Therefore, in the context of the PPG, the LPA cannot simply dismiss the findings of the SHMA as they do in EDPR04. Whilst there was not a specific uplift for affordable, the Inspector was clear that the affordable housing that would be delivered using the OAN would represent a significant uplift on historic rates of affordable homes which was necessary. By using the standard method, the Council is ignoring the Inspector's conclusion on this issue and will have a significantly detrimental impact on the provision of affordable homes.</p> <p>The draft standard method would reflect and assist in delivering the affordable housing in the SHMA. As a minimum the LPA should have undertaken an affordable housing update to understand the local circumstances as to whether the affordability ratio is appropriate. It must be remembered that providing homes for those in affordable housing need is a crucial part of the planning process and a simple application of the standard method will not meet their needs. Therefore, the Plan Review should not progress on this basis.</p>	<p>Comment noted. The Council has followed the PPG</p> <p>Affordable housing need is encompassed within local housing need as assessed under paragraph 60 of the Framework.</p> <p>A simple application of the standard method is in line with national policy. Complex calculations involving a series of uplifts resulting in an incomprehensible calculation was the problem that the straightforward standard method was deliberately brought in to solve.</p>
Savills for Fylde Coast Care Village Ltd	The site is considered to be entirely suitable for redevelopment for new housing to assist the Council in meeting its requirement. Accordingly, this should be reflected in the Local Plan under the relevant policies relating to housing development, namely Policy DLF1: 'Development Locations for Fylde'.	DLF1 is not the appropriate policy. The representation relates to a policy that is not part of the Partial Review.

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Emery Planning for Hollins Strategic Land	<p>National policy does not support a plan review based on a lower Local Housing Need identified by the standard method to that in the adopted Local Plan. Para 33 of the Framework advises review in less than the statutory minimum is necessary when local housing need figure has changed significantly; PPG clarifies this is where a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method, or has been subject to a cap where the plan has been adopted using the standard method; no justification in the Framework or the PPG for an early plan review based on the adopted housing requirement being higher than the requirement generated by the standard method. In that context a revision through this Partial Review to reduce the housing requirement of 415 dwellings per annum to 275 dwellings per annum has no support in the Framework or PPG. Therefore, on this reason alone the Partial Review is not entitled to review the requirement in Policy H1.</p> <p>To establish the overall housing need it is necessary to apply the standard method unless exceptional circumstances justify an alternative. A hyperlink then takes the reader to the section titled “Housing and economic needs assessment - Guides councils in how to assess their housing needs”. The LPA has undertaken the standard method as set out in the PPG.</p> <p>However paragraph 010 notes there may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests. SHMA identified an annual net need of 207 affordable homes per annum. Using the standard method after applying the affordability ratio the housing figure increased from 253 to 275 dwellings, an increase of 22 dwellings. This is some 10% of the actual affordable need identified in the SHMA. Therefore, in the context of the PPG, the LPA cannot simply dismiss the findings of the SHMA as they do in EDPR04. Whilst there was not a specific uplift for affordable, the Inspector was clear that the affordable housing that would be delivered using the OAN would represent a significant uplift on historic rates of affordable homes which was necessary. By using the standard method, the Council is ignoring the Inspector’s conclusion on this issue and will have a significantly detrimental impact on the provision of affordable homes.</p>	<p>The Council is entitled to review its plan when and for whatever reason it sees fit</p> <p>These are particular triggers when a review is needed. They do not preclude review in other circumstances</p> <p>The Partial Review does not reduce the housing requirement. It introduces a range</p> <p>Comment noted. The Council has followed the PPG</p> <p>Affordable housing need is encompassed within local housing need as assessed under paragraph 60 of the Framework.</p>

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	The draft standard method would reflect and assist in delivering the affordable housing in the SHMA. As a minimum the LPA should have undertaken an affordable housing update to understand the local circumstances as to whether the affordability ratio is appropriate. It must be remembered that providing homes for those in affordable housing need is a crucial part of the planning process and a simple application of the standard method will not meet their needs. Therefore, the Plan Review should not progress on this basis.	A simple application of the standard method is in line with national policy. Complex calculations involving a series of uplifts resulting in an incomprehensible calculation was the problem that the straightforward standard method was deliberately brought in to solve.
Cassidy & Ashton for Home Farm	It remains ironic that despite promoting a policy that identifies Strategic Locations for Development, the majority of allocations have remained outside of the key settlement and principle Strategic Location for Development, Lytham St Annes; therefore appropriate that this location is given priority in identifying an additional site[s] to address the unmet need in Wyre.	The allocations remain unchanged and no further allocations are required. The four strategic locations have equal status in the development strategy
Pegasus Group for Hallam Land Management Ltd	The Local Plan should provide sites for 10,550 dwellings over the plan period to 31 March 2032, and more should the plan period be extended as suggested	An increase in the plan requirement is not needed
Paragraph 7.12: Biodiversity in Areas of Separation		
	No representations received in relation to this section	
Policy GD4		
Home Builders' Federation	Not sound as it is not positively prepared or consistent with national policy: the HBF does not consider that this policy is in line with NPPF 2019, which looks for planning policies to be responsive to local circumstances, to support housing developments that reflect local needs and to locate housing where it will enhance or maintain the vitality of rural communities. It then goes on to set more restrictive policies for 'isolated homes in the countryside', these are similar to those currently included in Policy GD4. The HBF consider that this policy should be amended to better reflect the policy set out in NPPF	Sites are allocated in the seven sustainable rural settlements identified in the settlement hierarchy as Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements: these are included within the settlement boundary for those settlements, and fall outside Policy GD4. The countryside areas covered by Policy GD4 do not include settlements larger than small groups of dwellings. The policy is sound, as before, but needs to be considered within the context of the whole FLP32 development strategy. In this broad respect, the old and new wording of the Framework is substantially the same.

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		The new text in part a. quotes directly from NPPF19 paragraph 84 and is a necessary update to reflect that paragraph
DePol Associates	<p>Proposed change is not positively prepared: takes a negative approach to development; greater restriction on development than the current policy; Council has incorrectly interpreted paragraph 84 by selective inclusion of parts of the paragraph; must be read in the context of the leading sentence of GD4 which ultimately seeks to limit development not permit it; taken as a whole, with the proposed introduced new wording, the forms of development permissible in the countryside, under criterion a, would have to meet local business or community needs; would not allow for agriculture, horticulture or forestry development which met needs which were not necessarily local; no reasons why non-local requirements may not also be acceptable in the wider setting of the Local Plan and NPPF</p> <p>Not justified: no clear consideration as to whether the alternative of not altering the policy and not inserting additional wording would be consistent with NPPF. The policy, as currently worded is not considered to preclude compliance with the requirements of NPPF paragraph 84. The existing policy provides for development beyond settlement boundaries, to meet local business and community needs without making explicit reference to it. Proposed wording would preclude forms of development currently permitted by the policy; no justification as to why those have been excluded i.e. development which does not respond to local business or community needs; paragraph 83 of NPPF is clear that policies should enable the growth and expansion of all types of businesses in rural areas.</p> <p>The incorporation of the proposed final sentence is also not justified in the setting of the existing policy and wider policies in the plan</p> <p>In reviewing Policy GD4, the Council has left a proportion of the policy unchanged but in proposing to amend it the Council will have reviewed the policy in its entirety. In this context it is considered that there is no justification for the retention of the words 'small-scale' in respect of tourist accommodation and 'very exceptionally, larger scale' in relation to tourism development particularly as this approach is not supported in paragraph 83 of NPPF. The retention of these size parameters is not justified to any degree, particularly where there are other policies in the plan, as identified above, which proposals will need to be assessed against. The unchanged wording of the condition would suggest that small scale tourism development (which was not</p>	<p>Criterion a) as written does not place greater restriction on development than the original version in FLP32. Paragraph 84 NPPF is significant because it is new text which takes a more permissive approach by stating that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found. This is a significant change and these words have therefore been added to criterion a). The comma between the words 'needs' and 'for' makes it clear that these local business and community needs are one category of development and agriculture, horticulture or forestry etc are another. The local business and community needs can be for any use that falls under that definition, and not necessarily agriculture, forestry or horticulture as suggested by the representor. Therefore, no additional restrictions are imposed as a result of this. The Council consider this to be positively prepared and justified, by ensuring that local business and community needs can be met through Policy GD4, and thus achieving sustainable development as defined in the NPPF.</p> <p>The addition of the final sentence to criterion a) is justified because this is new text which has been added to the NPPF, which is specific to rural areas. Policy GD4 relates specifically to Development in the Countryside and the addition of the of the final sentence to criteria a) is needed to ensure that the introduction of the new category of development (local business and community needs), by NPPF 19 is as sustainable as possible.</p> <p>In the Regulation 18 Consultation letter and the Publication Consultation letter, the Council has made very clear that The Partial Review of the Fylde Local Plan to 2032 is not a</p>

Respondent	Summary of comment	Council response
	<p>accommodation) would not be acceptable but large scale potentially would be. A reasonable alternative would be for policy GD4 to not refer to scale and this alternative approach would be justified by the controls administered via other policies in the plan and NPPF.</p> <p>Proposed change is inconsistent with national policy because of the way it has selectively utilised paragraph 84; also fails to serve a purpose, merely duplicating the policies in the NPPF. Lack of clarity: unclear in the proposed policy wording whether the local business and community needs applies to “other uses appropriate to a rural area...”. This second part of criterion a) is separated by a semi-colon from the first part suggesting that it does not apply. However, the proposed altered policy is then concluded with a further extract from paragraph 84 which suggests that the requirement for development not to have unacceptable impact on local roads etc is applicable to all parts of the policy.</p> <p>Policy is not in general conformity with NPPF: Anita Coleman v SoS for CLG [2013] EWHC 1138 (admin) confirms that for a policy to be consistent with the Framework it must adopt a cost/benefit analysis approach, allowing for a judgment to be made as to whether an adverse impact would be outweighed by the scheme’s benefits. It does not support policies which place a blanket ban on particular types of development and preclude the ability to undertake this cost/benefit analysis. The wording of the proposed policy would limit the forms of development which would be acceptable in the Countryside contrary to the requirement for a cost/benefit approach; notable in this is the retention of reference to ‘small-scale’ and ‘exceptionally, large scale’ in the proposed revised policy. These specific references prohibit development not in accordance with these scales from being approved under GD4. For example, a small-scale tourist development, which was not accommodation, would be directly contrary to this policy and would not be permissible under amended policy GD4 regardless of its benefits. If the reference to scale were to be removed this would not preclude the refusal of unacceptable proposals for tourist development in the context of other policies and NPPF. Furthermore NPPF Paragraph 83 identifies that policies should enable “sustainable rural tourism and leisure developments which respect the character of the countryside”. This does not suggest that scale of any particular leisure or tourism use should be the determinative factor in whether a scheme is acceptable or not. The inclusion of a scale parameters in respect of leisure and tourism developments is clearly inconsistent with paragraph 83 of NPPF in any event.</p>	<p>complete review of the Local Plan. It makes proposed revisions to the Local Plan to deal with two specific issues. The relevant issue here is to deal with the need to ensure that the Local Plan remains in accordance with national planning policy, following the publication of the new National Planning Policy Framework in February 2019. Therefore, it was not within the scope of the Partial Review to review the policy in its entirety.</p> <p>The wording in relation to scale was included in the adopted FLP32 in order that the FLP32 would comply with paragraph 83, in particular the references to sustainable growth and expansion and sustainable rural tourism and leisure developments. The wording of Paragraph 83 has not changed from NPPF12 to NPPF 19 it has simply been reformatted. The word ‘sustainable’ does relate to the size of enterprises therefore the use of size parameters is entirely justified.</p>

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	<p>In order to clarify the policy, it is proposed that the criterion is split into two and the two parts of the policy separated out. Proposed following amendment would be sound in the setting of paragraph 34 of NPPF:</p> <p>Development in the Countryside, shown on the Policies Map including Inset Plans, will be limited to:</p> <ul style="list-style-type: none"> a) that needed for purposes of agriculture, horticulture or forestry; b) other uses appropriate to a rural area, including uses which would help to diversify the rural economy, including tourist accommodation, holiday caravan sites and tourism development; c) the re-use or rehabilitation of existing permanent and substantial buildings; d) extensions to existing dwellings and other buildings in accordance with Policy H7; e) development essentially needed for the continuation of an existing enterprise, facility or operation, of a type and scale which would not harm the character of the surrounding countryside; f) isolated new homes in the countryside which meet the criteria set out in Policy H6; g) minor infill development; h) development needed to support entry-level exception sites for first-time buyers (or those looking to rent their own home) on land not already allocated for housing which meets the criteria set out in Policy GD7. 	
Paragraph 7.14: development in the countryside		
	No representations received in relation to this section	
Paragraph 7.21: mixed use development		
	No representations received in relation to this section	
Policy GD7: health and wellbeing and quality not diminished		
Canal & River Trust	Welcome the expanded policy GD7 criteria I) with the inclusion to 'promote health and wellbeing'; our waterways would have a role to play in supporting communities	Support welcomed

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	health and wellbeing, by providing free access to our green/blue infrastructure network	
Sport England	Welcome the amendments proposed to GD7 regarding the promotion of health and wellbeing; approach is consistent with Sport England's guidance regarding Active Design	Support welcomed
Paragraph 8.17: demand for land		
Bryning-with-Warton Parish Council	Concerns regarding the impact this may have on the long argued potential of Warton 'Enterprise Zone' and now several years down the line nothing has materialised thus the future in favour of housing as part of this 'Strategic Location'. Will the Parish Council be included in carrying out the 'Regular Review'?	Comment noted. Any reviews will be part of a future plan-making process
Paragraph 8.22: rural areas		
	No representations received in relation to this section	
Policy EC5 Vibrant Town, District and Local Centres		
	No representations received in relation to this section	
Paragraph 8.55: town centre first approach		
	No representations received in relation to this section	
Paragraphs 9.10, 9.11 and 9.12: consolidation of paragraphs		
	No representations received in relation to this section	
Paragraph 9.13: local housing needs assessment		
Turley for Strategic Land Group	Planning Practice Guidance (PPG) is explicit that the SM identifies only baseline housing needs, i.e. it provides only a "...minimum starting point in determining the number of homes needed in an area...". The PPG therefore notes that the number of new homes needed in an area may be higher than the SM indicates (Paragraph: 010, Reference ID: 2a-010-20190220), and makes clear that this will "...need to be	Paragraph 60 of the Framework makes clear that the standard method determines the minimum number of homes needed

Respondent	Summary of comment	Council response
	<p>assessed...” before the identified need is translated into a housing requirement figure in a Local Plan. Despite this, the Council is seeking to transpose the minimum SM figure into the FLP32 as the bottom end of the housing requirement range. SLG considers that this is unsound.</p> <p>The household projections which underpin the SM extrapolate past trends experienced between 2009 and 2014 during the recession, when significant reductions in employment and housing delivery, constrained household formation, worsening affordability and the outmigration of younger age groups; resulted in a significant under-supply. The adoption of the minimum “...starting point...” SM figure as a housing requirement will ‘lock in’ these historic and recessionary trends. This does not recognise Fylde’s particular housing needs and is not consistent with the requirement of the NPPF to plan positively</p> <p>The Council has failed to assess whether circumstances in Fylde mean that the minimum starting point SM figure should be adjusted upwards, despite the clear requirement to do so in the PPG. The PPG makes clear that housing need may exceed the past recessionary trends, for example where, inter alia, growth strategies or infrastructure improvements might stimulate higher housing demand. There is no consideration or assessment in the Housing Needs and Requirement Background Paper (March 2020) or elsewhere within the evidence base of the effect of such drivers of growth in Fylde on the baseline housing need figure as calculated by the SM. The adoption of the SM figure as the housing requirement for the Borough, even as the bottom end of a range, is therefore unjustified and inconsistent with the requirements of national policy, and is therefore unsound</p> <p>The standard method figure will be ineffective at meeting the Borough’s full housing needs. FLP32 identified OAN of c.410-430 dpa is required over the period to 2032. This resulted in the establishment of a housing requirement figure of 415 dpa. The examining Inspector noted that this represented an uplift on a demographic baseline of 274 dpa – which is notably similar to the SM baseline (272 dpa) – and concluded that such an uplift was justified and necessary for effectiveness; uplift from the 274 dpa demographic baseline to the 415 dpa requirement was required in order to, inter alia, support anticipated and planned job growth in the Borough. It is therefore clear that the SM figure will be similarly ineffective at supporting the Borough’s growth; particularly evident given similarity between the demographic baseline of 274 dpa – which was disregarded as being insufficient – and the minimum starting point SM figure of 272 dpa; and the draft revised SM identifies a much higher minimum housing</p>	<p>The standard method is national policy. The representation is making an argument against national policy. The Partial Review is planning in accordance with national policy. PPG states that <i>“The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes”</i></p> <p>The PPG does not consider the trends “recessionary” as noted above. The Council does not consider that housing needs are likely to exceed past trends, which are the circumstances referred to by PPG. PPG gives an example of the type of growth strategies meant: <i>“for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)”</i>; strategic infrastructure is <i>“improvements that are likely to drive an increase in the homes needed locally”</i>. Neither of these apply to Fylde.</p> <p>The demographic baseline data used by the SHMA was 256 dpa (as explained by the Housing Needs and Requirement Background Paper) and the standard method baseline is 253 dpa. 275 dpa is the standard method figure after uplifts are applied.</p> <p>The current standard method is national policy for the purposes of the Partial Review</p>

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	<p>need figure for Fylde of 488 dpa, higher even than the adopted requirement in the FLP32. This provides further evidence that the scale of the need for new homes in Fylde is much higher than that being planned for by the FLP32 and the Partial Review.</p> <p>Growth at the Enterprise Zones requires increased housing provision, not less. The Inspector's Report of the examination of the FLP32 noted that the 415 dpa requirement was insufficient to support any job growth within the Borough's Enterprise Zones (EZ), and that the implications of any such growth for the housing requirement would need to form part of the review [quotes FLP32 Inspector's Report, para. 56]; requirement to review the housing requirement in the event of jobs growth within the EZ's is an explicit requirement within the FLP32, as indicators 6 and 7 within the performance monitoring framework set out at Appendix 8. There is clear evidence of jobs growth: most recent progress report on the Blackpool Airport EZ to the Blackpool, Fylde and Wyre Economic Prosperity Board in January 2020 confirmed a total of 202 live enquiries, some 73 businesses have located to the Enterprise Zone since April 2016; a total of 1520 jobs have located to the EZ, includes jobs new to the area, safeguarded jobs within Blackpool and construction full time equivalent jobs; further developments will contribute further job growth e.g. planning permission granted for a new 40,000sqft commercial unit within the EZ, estimated 85 new jobs to the EZ, rising to 100 within five years.</p> <p>Council failed to consider job growth within the EZ's for the scale of housing provision; would likely result in an increased need, justifying an increase in the 415 dpa requirement, instead of the decrease proposed by the Partial Review</p>	<p>Jobs growth was an element that required consideration in the methodology contained within the defunct PPG that accompanied the superseded NPPF12. The standard method incorporates the impact of jobs growth on demand through both the demographic trends, which reflect previous jobs growth, and the affordability ratio which responds to scarcity in the marketplace by addressing affordability.</p> <p>The Blackpool Airport EZ lies within Fylde and Blackpool and a significant part of its role is to provide new jobs to address the very serious levels of deprivation and structural unemployment found in Blackpool. It is not considered that the level of activity has warranted specific uplift through the Partial Review.</p>
Lichfields for Taylor Wimpey	<p>The Framework is clear that the standard methodology is the default approach for calculating local housing need unless there are "exceptional circumstances" which could justify an alternative approach which also reflects current and future demographic trends and market signals [§60]. The Planning Practice Guidance [PPG] confirms that 2014-based household projections should be used to set the baseline to provide.</p> <p>LHN target is intended to be a minimum figure, with justifications to go below this relating to environmental or policy constraints rather than issues over the reliability of the household projections</p>	Noted. The Council has adopted the default approach

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	<p>PPG makes it clear that there will be circumstances when a higher figure than that generated by the standard method might be considered appropriate.</p> <p>Circumstances which might justify an uplift include:</p> <ul style="list-style-type: none"> • growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); • strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or, • an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. <p>PPG also notes that where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater; need to take this into account</p> <p>PPG also requires a calculation to be made of the total annual need for affordable housing; notes total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments; An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes; reference to uplifting the housing figures to help deliver affordable housing need suggests that this is a component part of the calculation of the housing requirement, rather than LHN itself. Any new calculation of the housing requirement in the Partial Revision will need to ensure that the above factors are fully considered</p> <p>Emerging planning forms: notes both consultations, consistent focus on boosting the supply of homes and ensuring that sufficient land is identified for housing</p> <p>In the consultation paper, there is a realisation that the current standard method is overly reliant on the household projections which are volatile and can result in artificially low projections in some places which results in overcrowding and concealed households suppressing the numbers</p> <p>Housing requirement derived from the new standard method is 488 dwellings per year which is closely aligned to Council's 3-year average delivery of 472 dwellings per annum. Current plan requirement 415 dpa, current standard method 272 dpa; of the four figures the outlier is the requirement derived from the current standard method</p>	<p>NPPf19 para 61 requires that housing needs of different groups need to be reflected within planning policies "<i>Within this context</i>", <i>inter alia</i>, within the level of provision required as a minimum in para 60.</p> <p>The FLP32 Inspector did not consider that the overall housing requirement figure required further uplift specifically to provide for affordable housing.</p> <p>The current standard method is national policy for the purposes of the Partial Review</p> <p>The draft revised standard method is itself volatile relies on the 2018-based projections which repeat some of the deficiencies of the 2016-based projections which were rejected for use by the government.</p>

Respondent	Summary of comment	Council response
	<p>which the Government is seeking to move away from as it does not achieve the Government's ambition to boost the supply of housing. Although new standard method is in draft and subject to change, indicates a direction of travel; suggests that Fylde's housing need has been artificially suppressed by the existing standard method; utilising this method will not assist in addressing the national housing crisis</p> <p>OAN for Fylde informed by the Fylde Coast SHMA; SHMA Addendum 3 concluded that the OAN for housing was a range of between 410 and 430 dpa; requirement set out in Policy DLF1 of 415 dpa is within this range. The OAN range was not based solely on demographic projections, it also took into account future levels of employment growth. Therefore, the economic projections which inform the employment land requirement and the housing requirement in the Plan align.</p>	<p>The OAN was assessed following the methodology of the defunct PPG which has been replaced by the standard method.</p>
<p>Emery Planning for Wainhomes North West Ltd</p>	<p>The revised housing requirement proposed by the Fylde Local Plan Review is based on the change to housing needs methodology in the 2019 Framework: current standard method gives a minimum of 275 dwellings per annum; the Government published a revised standard method for calculating local housing need in their 'Changes to the current planning system' consultation document, dated August 2020: revised standard method results gives 488 dwellings per annum. Whilst still in draft, this is significantly higher than both the minimum requirement proposed (275 dwellings per annum) and the adopted housing requirement (415 dwellings per annum).</p> <p>Paragraph 31 of the Framework requires policies should be underpinned by relevant and up-to-date evidence; adoption of the revised housing requirement as proposed would be to dismiss the draft methodology which is undoubtedly a crucial piece of relevant and up-to-date evidence.</p> <p>We note that the Inspectors wrote to the LPA on 8th July 2020 [this seems to be a reference to another Local Plan examination, further context is not provided] requesting updated assessments of need based on 2018 based projections, and assessment of whether this represents meaningful change for purposes of PPG; LPA responded stating no meaningful change.</p> <p>In the case of Fylde, the 2014 based projections estimated an increase of 2,499 new households between 2020 and 2030, whereas the 2018 based projections estimate an increase of 4,280 households. This is a meaningful and significant change and one which requires the Partial Review to address. If it does not, then the proposed</p>	<p>The draft standard method is a consultation draft. The current standard method is national policy for the Partial Review. PPG states that <i>"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."</i></p> <p>As noted above, national policy and guidance require the use of the 2014-based projections for the calculation under the standard method</p>

Respondent	Summary of comment	Council response
	<p>housing requirement in the Partial Review is in contravention of the Framework and PPG</p> <p>Framework states that development plans are likely to require earlier review than the statutory minimum where “local housing need is expected to change significantly in the near future.” To progress the Partial Review with a housing requirement based on the current standard method would be to act prematurely given the proposed revisions to the standard method and the resulting implications for Fylde’s housing need. To adopt the Schedule of Revisions now would be to do so on the basis that the Plan would likely require an immediate review. This would be contrary to the aims of the Framework to plan positively and anticipate long-term strategic requirements</p> <p>Schedule of Revisions states that the objective of the Plan Review is to ensure that any unmet need is met within the Fylde Coast Housing Market Area (HMA): unclear how achieved on the basis of a housing requirement that would be almost immediately out of date upon adoption</p> <p>Local housing need for the HMA based on the current and draft revised standard method gives Fylde 275 current 488 revised, Wyre 308 current 383 revised, Blackpool 114 current 303 revised, HMA total 697 current 1,174 revised: the Council cannot expect to ensure that the needs of the HMA are met through a plan review which disregards the most up-to-date evidence of housing need in favour of a lower housing requirement</p> <p>Premature for Fylde Council to seek to revise its housing requirement at this stage. An effective and justified strategy would be to await the outcome of the Government’s draft revised methodology for calculating local housing need, to ensure that the plan is effective in its delivery of housing for Fylde and the wider HMA. The LPA would then be entitled under Paragraph ID: 61-062-20190315 of the PPG as the Fylde Local Plan was adopted prior to the standard method being implemented, on the basis of a number that is significantly below (415 dwellings) the number generated using the standard method (488 dwellings) on the basis the draft method is adopted. However, that must also be done in co-operation with both Wyre and Blackpool.</p>	<p>The representor urges the Council to act to abandon its Partial Review on the basis of consultation draft policy changes that could yet be entirely discarded or fundamentally altered.</p> <p>The housing requirement would not be out-of-date. It would remain in place in the adopted plan.</p> <p>The draft standard method remains a consultation draft. The Council is responding to current national policy. The shape of future policy is a matter of speculation.</p> <p>The Council is entitled to bring forward its Partial Review if it sees fit</p>
Gladman Developments	Consider the revised housing target to be arbitrarily low and at odds with the national imperative to significantly boost the supply of housing	

Respondent	Summary of comment	Council response
	<p>Standard Method, this is the minimum level of housing that the authority would need to accommodate to fulfil the requirements of national planning policy, and is considerably less than the adopted housing requirement of 415 dpa</p> <p>Background Paper seeks to argue that there are no grounds for deviating from the Standard Method or increasing the Council's housing needs above 275 dpa; Gladman take issue with the reasoning provided for this: the affordability ratio element of the current Standard Method largely replaces the market signals uplift contained within previous guidance on assessing a Council's objectively assessed housing needs, and does not remove the ability or need to plan for a higher level of housing where this would support economic growth proposals;</p> <p>The Background Paper reports how the baseline demographic target that underpins the Council's adopted housing target of 415 dpa was 253 dpa, and very similar to the 256 dpa figure that now underpins the Council's Standard Method calculation. However, an important factor in increasing this baseline demographic figure to 415 dpa was the need to plan for additional job growth, yet no consideration appears to have been given to issue when advancing the authority's revised housing target</p> <p>PPG makes clear that it may be appropriate to increase an authority's local housing need figure where this would help to support local growth strategies, or where previous assessments of housing need (such as those contained in a SHMA) are significantly greater than the Standard Method; therefore Council should not deviate from the evidence base that underpinned its current adopted housing target without compelling evidence</p> <p>Proposed revisions to the Standard Method give minimum of 488 dpa, before taking into account any factors that could suggest the need to plan for a higher level; completions totalled 463.490 and 634 dpa in 2017/18. 2018/19 and 2019/20 respectively: supports the need to plan for more than the minimum 275 dpa requirement as in indication of actual housing demand and need in the borough</p> <p>Council's attempt to reduce their housing target is inconsistent with the authority's previous economic aspirations and will only serve to unjustifiably frustrate and prevent the delivery of much needed housing within the borough; questionable why the Council seeking change, having already sought to identify sufficient sites to meet their higher adopted requirement</p> <p>Therefore believe that there are no grounds for departing from or amending the authority's current adopted housing target; rather, the Council should now be looking</p>	<p>The standard method identifies the minimum local housing need in accordance with national policy.</p> <p>An LPA can choose to plan for a greater number than the standard method</p> <p>Planning for job growth, in parallel to planning for demographic change and uplifts, was a feature of the historic approach of PPG under NPPF12. The standard method adopts a different approach</p> <p>The assessment of need made in the SHMA for the FLP32 followed the defunct PPG methodology that is replaced with that in the PPG for the standard method. Current PPG states that the higher previous figure should be taken into account when deciding whether to plan for a higher level of need. The Council has accepted the up-to-date method but has continued to plan for a higher level of provision through the retention of all existing allocations.</p> <p>The proposed requirement plans for a range of 275-415. The higher levels of completions have been necessary to make up for shortfall against what was already an increased level of needs in the early part of the plan period: they do not themselves justify a further increase</p> <p>The revised housing requirement is a range not a reduction; it will continue to ensure delivery of the housing planned for within the FLP32; it will not frustrate or prevent delivery.</p>

Respondent	Summary of comment	Council response
	to allocate additional sites and plan for a higher level of housing, to respond to any unmet needs and any increase in Fylde's own housing needs	
Emery Planning for Hollins Strategic Land	<p>The revised housing requirement proposed by the Fylde Local Plan Review is based on the change to housing needs methodology in the 2019 Framework: current standard method gives a minimum of 275 dwellings per annum; the Government published a revised standard method for calculating local housing need in their 'Changes to the current planning system' consultation document, dated August 2020: revised standard method results gives 488 dwellings per annum. Whilst still in draft, this is significantly higher than both the minimum requirement proposed (275 dwellings per annum) and the adopted housing requirement (415 dwellings per annum).</p> <p>Paragraph 31 of the Framework requires policies should be underpinned by relevant and up-to-date evidence; adoption of the revised housing requirement as proposed would be to dismiss the draft methodology which is undoubtedly a crucial piece of relevant and up-to-date evidence.</p> <p>We note that the Inspectors wrote to the LPA on 8th July 2020 [this seems to be a reference to another Local Plan examination, further context is not provided] requesting updated assessments of need based on 2018 based projections, and assessment of whether this represents meaningful change for purposes of PPG; LPA responded stating no meaningful change.</p> <p>In the case of Fylde, the 2014 based projections estimated an increase of 2,499 new households between 2020 and 2030, whereas the 2018 based projections estimate an increase of 4,280 households. This is a meaningful and significant change and one which requires the Partial Review to address. If it does not, then the proposed housing requirement in the Partial Review is in contravention of the Framework and PPG</p> <p>Framework states that development plans are likely to require earlier review than the statutory minimum where "local housing need is expected to change significantly in the near future." To progress the Partial Review with a housing requirement based on the current standard method would be to act prematurely given the proposed revisions to the standard method and the resulting implications for Fylde's housing need. To adopt the Schedule of Revisions now would be to do so on the basis that the</p>	<p>The draft standard method is a consultation draft. The current standard method is national policy for the Partial Review. PPG states that <i>"The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes."</i></p> <p>As noted above, national policy and guidance require the use of the 2014-based projections for the calculation under the standard method</p> <p>The representor urges the Council to act to abandon its Partial Review on the basis of consultation draft policy changes that could yet be entirely discarded or fundamentally altered.</p>

Respondent	Summary of comment	Council response						
	<p>Plan would likely require an immediate review. This would be contrary to the aims of the Framework to plan positively and anticipate long-term strategic requirements</p> <p>Schedule of Revisions states that the objective of the Plan Review is to ensure that any unmet need is met within the Fylde Coast Housing Market Area (HMA): unclear how achieved on the basis of a housing requirement that would be almost immediately out of date upon adoption</p> <p>Local housing need for the HMA based on the current and draft revised standard method gives Fylde 275 current 488 revised, Wyre 308 current 383 revised, Blackpool 114 current 303 revised, HMA total 697 current 1,174 revised: the Council cannot expect to ensure that the needs of the HMA are met through a plan review which disregards the most up-to-date evidence of housing need in favour of a lower housing requirement</p> <p>Premature for Fylde Council to seek to revise its housing requirement at this stage. An effective and justified strategy would be to await the outcome of the Government’s draft revised methodology for calculating local housing need, to ensure that the plan is effective in its delivery of housing for Fylde and the wider HMA. The LPA would then be entitled under Paragraph ID: 61-062-20190315 of the PPG as the Fylde Local Plan was adopted prior to the standard method being implemented, on the basis of a number that is significantly below (415 dwellings) the number generated using the standard method (488 dwellings) on the basis the draft method is adopted. However, that must also be done in co-operation with both Wyre and Blackpool.</p>	<p>The housing requirement would not be out-of-date. It would remain in place in the adopted plan.</p> <p>The draft standard method remains a consultation draft. The Council is responding to current national policy. The shape of future policy is a matter of speculation.</p> <p>The Council is entitled to bring forward its Partial Review if it sees fit</p>						
Pegasus Group for Hallam Land Management Ltd	<p>Government recently launched a consultation on changes to the standard method, which introduces an element of growth based on existing stock, and increased affordability uplifts, which leads to significant increases in several local authorities, including Fylde, where the indicative figure is 488 dpa, an increase of 77% from the current standard method (and 18% from the adopted plan figure). Fylde Coast requirements:</p> <table><tr><td>LPA</td><td>Adopted Requirement</td><td>Current Standard Method suggested in Fylde</td><td>Current Standard Method 2020-30 (2014</td><td>Current Standard Method 2020-30 (2018</td><td>Government's Proposed Changes (0.5% stock increase</td></tr></table>	LPA	Adopted Requirement	Current Standard Method suggested in Fylde	Current Standard Method 2020-30 (2014	Current Standard Method 2020-30 (2018	Government's Proposed Changes (0.5% stock increase	<p>The draft standard method is a consultation draft. The current standard method is national policy for the Partial Review.</p> <p>The draft revised standard method is volatile relies on the 2018-based projections which repeat some of the deficiencies of the 2016-based projections which were rejected for use by the government. There is no certainty that it will be adopted.</p>
LPA	Adopted Requirement	Current Standard Method suggested in Fylde	Current Standard Method 2020-30 (2014	Current Standard Method 2020-30 (2018	Government's Proposed Changes (0.5% stock increase			

Respondent	Summary of comment						Council response
			Draft SOCG (SDPR05)	HHP / 2019 Aff Rates)	HHP / 2019 Aff Rates)	+ affordable uplifts)	
	Blackpool	280	114	121	40	303	
	Fylde	415	275	272	466	488	
	Wyre	460	308	296	430	383	
	Fylde Coast HMA Total	1,155	697	689	936	1,174	
	<p>Total need figure of 1,174 dpa across the Fylde Coast which is 68% higher than the current figure claimed by the Council (697 dpa) and marginally higher (1.6%) than the total adopted requirement of the Fylde Coast.</p> <p>Acknowledged subject to change but unlikely to reduce given national target; even under the current methodology, the latest 2018 household projections and 2019 affordability ratios generates a requirement of 466 dpa, showing that underlying need in Fylde is increasing anyway; accordingly, it is our strong view that the Council need to plan for a figure of at least 488 dpa which will require significant additional allocations, and may also need to reconsider unmet need within Wyre and potentially Blackpool with their figures rising as well; even under the current standard method regime, there are exceptional circumstances that would support an elevated housing target above the 275 dpa; PPG sets out the circumstances when it might be appropriate to plan for a higher housing need than the standard method indicates, including where there are growth strategies for the area, strategic infrastructure improvements, where an authority has agreed to take on unmet need from neighbouring authorities, or where previous levels of housing delivery or assessments of need are significantly greater than the standard method.</p> <p>Growth Strategies & Strategic Infrastructure Improvements: Warton EZ is part of the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), delivered through the Lancashire Growth Deal (2014), £320m to the Lancashire LEP to support economic growth; up to 11,000 new jobs, 3,900 new homes and attract £1.2 billion of additional investment; also a £20m Growing Places investment fund (run by the Lancashire</p>						<p>The Council is planning for the range 275-415, which meets the local housing need identified through the standard method following national policy, but provides significantly above that through the existing FLP32 allocations</p> <p>Development through LAMEC has to date been focussed on other parts of Lancashire.</p>

Respondent	Summary of comment	Council response
	<p>Enterprise Partnership), to support infrastructure, commercial and housing development across Lancashire. In respect of strategic infrastructure, the £200m Preston Western Distributor Road is under construction which has a direct impact on Warton by improving access to the EZ and reducing pressure on the local road network. Accordingly, this clearly demonstrates that there are significant and ambitious growth strategies and infrastructure improvements in this location that could support an elevated level of housing growth to that set out in the current standard methodology.</p> <p>Unmet need in adjacent authorities: entire Plan Review is based around potential unmet need in Wyre based on the current adopted plan figures. The Council consider this is no longer an issue based on significantly reduced requirements in Fylde and Wyre under the current standard method; however the government's emerging method sees the requirement increase beyond adopted levels across the 3 Fylde Coast authorities, suggesting that there will be unmet need to deal with, potentially in Wyre and in Blackpool, where there are known to be land constraints</p> <p>Previous delivery: 2015/16 was 315; 2016/17 453; 2017/18 463; 2018/19 490; 2019/20 634; total 2,040; annual completions have significantly exceeded the current standard method figure by a total of 980 dwellings across the 5 years (and the adopted target of 415 dpa by 280 across the 5 years), indicating the actual need far outstrips the standard method figure; current plan wasn't adopted until October 2018, (3.5 years into that 5 year period) meaning that much of this delivery was occurring before this target was adopted demonstrating a latent demand</p> <p>Overall, it is clear that the Council should consider adopting the revised standard method figure of 488 dpa going forward, to save this being imposed in the coming months anyway; particularly given that it is in line with current delivery rates (with the last 2 years exceeding 488 per year), whilst the other indicators detailed in the PPG all support an increase from the current standard method figure: likely to require significant additional allocations within the Fylde Local Plan Review</p>	<p>The Preston Western Distributor Road allowed for the level of development in Warton allocated in the FLP32. It does not however provide <i>"improvements that are likely to drive an increase in the homes needed locally"</i> as the example in PPG envisages, in the strategic locations for development in the Borough</p> <p>The draft standard method is a consultation draft. The current standard method is national policy for the Partial Review.</p> <p>The higher levels of completions have been necessary to make up for shortfall against what was already an increased level of needs in the early part of the plan period: they do not themselves justify a further increase</p> <p>The Council is planning on the basis of current national policy</p>
Paragraph 9.14: housing requirement		
	Representations that could be considered related to this paragraph have been included in the section for Policy H1	

Respondent	Summary of comment	Council response
Paragraph 9.16: plan period requirement		
	Representations that could be considered related to this paragraph have been included in the section for Policy H1	
Paragraph 9.17: residual requirement		
Bryning-with-Warton Parish Council	Liverpool method: The Parish Council has supported this method of calculation from the outset and had it been adopted sooner Warton may not have suffered such 'over development' in recent years	Comment noted. The proposed approach is unchanged from the FLP32
Savills for Fylde Coast Care Village Ltd	<p>We broadly agree with the revised housing requirement. However, the Council should focus on the higher figures to ensure that housing needs are met</p> <p>Planning for the Future White Paper published for consultation: clear emphasis on the need to deliver new homes</p> <p>Revised Standard Method shows an increase in housing requirement for Fylde, although this will be subject to further detailed review; the Council should certainly retain the requirement identified in the Partial Review of the Local Plan, as a minimum</p>	<p>Comment noted. The Partial Review does not change the allocations in the plan which reflect the higher figure</p> <p>Comment noted. The FLP32 provides for significantly higher levels of housing delivery than previously, and this is maintained by the Partial Review</p> <p>Comment noted.</p>
Paragraph 9.19: delivery		
	No representations received in relation to this section	
Policy H1		
Story Homes	<p>Not appropriate to include a range; suggests both a minimum level of necessary development but also a ceiling limit; not conducive to a strong growth area, as suggested in the Vision of the Local Plan, nor does it align with the intentions of central Government to deliver 300,000 new homes a year</p> <p>The addition of the housing requirement range indicates that Wyre have committed to fully meeting their unmet housing need, but Wyre Council have not produced its review, only undertaken scoping consultation: no more definitive actions have been taken to ensure delivery of the unmet need; therefore concerning to see Fylde Council</p>	The range recognises the level of housing need identified in national policy but also supports retention of the existing FLP32 allocations with the higher figure. The FLP32 as amended by the Partial Review provides for significantly higher levels of housing delivery than had previously occurred. The upper end is not a ceiling, and nowhere is it stated or implied that it is.

Respondent	Summary of comment	Council response
	<p>assume this shortfall is accounted for either through the imminent Wyre Local Plan review or through a recalculation of the Housing Requirement using emerging methodology. Story Homes invite Fylde Council to reconsider their approach and look at alternative routes to delivering this unmet housing need.</p>	<p>No assumptions are made concerning the shortfall, but the facts are stated, in particular the provisions of the Wyre Local Plan Policy LPR1. The Partial Review provides a backstop position: therefore the issue is addressed fully.</p>
<p>Turley for Strategic Land Group</p>	<p>Use of the standard method figure as the housing requirement is unjustified. The Council has presented no evidence to justify a figure in line with the demographic baseline, thereby removing the uplift that was established by the 415 dpa requirement just two years ago. Whilst it is noted that the Partial Review does not propose to deallocate any residential development land, the use of the SM figure as the bottom end of the requirement range – for the purposes of assessing the Borough’s 5-YHLS position – could frustrate the delivery of allocations and other suitable housing sites, such that the 415 dpa requirement is not achieved</p> <p>Objectives of NPPF cannot be delivered in isolation, must be pursued collectively (para 7,8); the baseline SM figure of 272 dpa would not support the Borough’s economic growth; adoption as (part of) the housing requirement figure would result in an ineffective housing policy which is not aligned with from the economic policies of the FLP32; would create a disconnect between the social and economic objectives of the Plan; would not be consistent with the NPPF</p> <p>Proposal of the Partial Review to transpose the baseline minimum starting point SM figure into the housing requirement, including for 5-YHLS purposes, is an attempt to reduce the level of housing provision in the Borough. This will result in a housing strategy which does not meet the Borough’s housing needs and does not support its planned economic growth. It will not result in sustainable development. It is considered to be unjustified, ineffective, not positively prepared and inconsistent with national planning policy</p>	<p>The figure is not in line with the demographic baseline: this is incorrect. The demographic baseline for the FLP32 figure was 256; the demographic baseline for the standard method is 253 (See the Housing Needs and Requirement Background Paper)</p> <p>The lower figure will not frustrate delivery of allocations which remain unchanged. It will protect the plan from the potential for the tilted balance leading to an unplanned, less sustainable pattern of development which would likely frustrate delivery of strategic allocations that are in the plan.</p> <p>It is not the baseline and it is not 272 dpa.</p> <p>The housing requirement range of 275-415 would be effective at delivering the allocations already made in the FLP32, and continue to fulfil its economic objectives.</p> <p>It is not an attempt to reduce the level of housing provision in the Borough. The introduction of the range will protect the level of delivery already programmed by the FLP32 and maintained by the Partial Review, providing significantly in excess of identified housing needs and supporting planned economic growth.</p>

Respondent	Summary of comment	Council response
Lichfields for Taylor Wimpey	<p>Partial Review must be considered in the context of the national ambition to boost the supply of housing and help to address the housing crisis. Furthermore, the recently released consultation on the changes to the planning system indicate a direction of travel away from the current standard method. As such, this Partial Review should seek to be ambitious and pre-emptive of the imminent changes to the planning system which are afoot. As the Council is currently delivering on its housing requirement and has an adequate supply of land, it seems perverse to be advocating for a reduction in the overall supply at a time when the Government wants to boost the supply of housing and 'level up' the economy of England, driving growth north</p> <p>the standard method provides a 'minimum starting point' and the Council would not be penalised for exceeding the minimum figure</p> <p>Examination of FLP32 debated Liverpool or Sedgefield method for calculating the 5-year supply; Inspector stated Liverpool method was appropriate in this instance (in 2018) due to the 'Plan's spatial strategy and the delivery of the larger strategic sites' [§88]; national planning policy is very clear that past under delivery since the base date of the plan should be added to the plan requirements for the next 5 year period (the Sedgefield Approach); sufficient time has now passed to allow strategic sites to progress; Partial Review must reconsider use of the 'Liverpool' method as it is at odds with national planning policy; no reason why the Sedgefield approach is not now applied.</p> <p>Key element of evidence is missing from that released to underpin the Partial Review: assessing the impact that this reduction in the housing requirement would have in particular on the delivery of affordable housing but also on homes suitable for first time buyers, key workers and family homes; most recent evidence on affordable housing need is SHMA Addendum 1 (November 2014) which concluded that the annual affordable housing requirement was 249 dwellings per annum: considerable: meeting this need will be adversely affected by the Council's decision to reduce its annual housing requirement. Conversely, reducing the annual housing requirement could directly affect the affordable housing requirement in the long term due to increased house prices as a result of a shortage of supply. There is also a requirement in national policy to prepare a LHN assessment to inform the new housing requirement and this has not been undertaken</p> <p>The Council has performed very strongly on the Housing Delivery Test [HDT] over the past 3 years and achieved 183% in the latest set of results: over 2016-2019, the</p>	<p>The Partial Review supports the FLP32 level of delivery which is a significant boost to the supply of homes from that previously achieved.</p> <p>Correct. The Council does exceed the minimum figure in its housing requirement range of 275-415.</p> <p>Whilst outline planning permission has been granted for the largest sites in the plan, delivery remains some time away on a number of sites. To ensure the plan remains effective, use of the Liverpool method should continue.</p> <p>The introduction of the housing requirement range would not lead to a reduction in delivery. All of the FLP32 allocations would remain. Affordable housing provision would not be affected; nor would provision of other types of housing.</p> <p>The introduction of a range will not result in a reduction in delivery; there would be no consequent "shortage of supply"</p> <p>The LHN assessment is undertaken in the Housing Needs and Requirement Background Paper</p>

Respondent	Summary of comment	Council response
	<p>Council delivered 455, 512 and 471 dwellings annually. It has a confirmed five year supply through its APS until 31st October 2020. The APS anticipates that the Council's annual housing delivery will be: 888, 576, 409, 430, 369, 711 and 605 respectively; in total, 3,988 units over the next 7 years, an annual average of 569 dwellings which is in excess of the Council's adopted housing requirement and assisting in meeting undersupply since the start of the plan period (2011). This evidence demonstrates that Fylde has the capacity to deliver its existing housing requirement and utilising the early review mechanism, and to suppress its housing requirement is fundamentally at variance with Government ambition.</p> <p>Council utilising short window of opportunity to reduce its housing requirement without considering the consequences and paying no consideration to the Government's stated ambition of boosting the supply of housing. Consequences: will worsen affordability issues; will lead to unsustainable commuting; will exacerbate high affordable housing needs; will reduce economic growth and reduce construction jobs; with uncertain economic times caused by the Covid-19 pandemic, should be seeking to drive economic growth; will affect employment levels and inward investment; will affect the Council's revenues from New Homes Bonus and Council Tax.</p> <p>Conclusion: Council should abandon Partial Review because: Government seek to boost the supply of houses; proposed standard method would derive a much higher housing requirement figure; White Paper intends that all plans be reviewed by 2024, the completion of this Partial Review now would represent abortive work and a waste of tax payers money; Council is claiming to be undertaking this Partial Review to meet Wyre's unmet need, but this is not the case, needs to align with Wyre; revised standard method gives figure of 488 dpa, therefore no logical and positive reason why the Council would seek to bring forward a much-reduced housing requirement figure now when the direction of travel indicates a new standard method: would be the antithesis of positive planning.</p>	<p>This level of delivery has been required in order to address undersupply in the early part of the plan period.</p> <p>The introduction of the range does not suppress the requirement.</p> <p>The adoption of the Partial Review including the housing requirement range will maintain the existing planned delivery set out in the FLP32; all allocations will remain and be brought forward; and therefore will have none of the effects described in the representation.</p> <p>The Partial Review should not be abandoned on the basis of consultation draft policies; the Partial Review protects the existing plan pending the requirement that is suggested will come forward through new legislation to produce a new type of plan.</p>
Home Builders' Federation	<p>Proposed policy H1 is not considered to be sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons</p> <p>The policy is not clearly written and it is not clear how the range would be used in the decision making process;</p>	<p>The Council disagrees, the policy is entirely clear.</p>

Respondent	Summary of comment	Council response
	<p>The range, and the removal of the word minimum from this version of the policy, would be contrary to the Government's objective to significantly boost the supply of homes;</p> <p>The housing need is higher than that provided by the LHN calculated using the standard method, and therefore the policy is not positively prepared or justified;</p> <p>There remain issues with the unmet need from Wyre, and therefore the policy is not effective; and</p> <p>The plan period is no longer consistent with the NPPF requirements.</p>	<p>The policy incorporating the range supports the provision of housing allocated within the plan notwithstanding the lower level of need identified in national policy.</p> <p>The minimum local housing need is in accordance with national policy. Other assessments of housing need are based on out-of-date policy</p> <p>Unmet need in Wyre is addressed in paragraphs 1.24 – 1.27</p>
Bryning-with-Warton Parish Council	Liverpool method: the Parish Council has supported this method of calculation from the outset and had it been adopted sooner Warton may not have suffered such 'over development' in recent years	Comment noted. The proposed approach is unchanged from the FLP32
Emery Planning for Wainhomes North West Ltd	<p>In light of the adopted requirement in Policy H1 and the draft Local Housing Need figure of 488, it is clear that a figure of 275 dwellings is a suppression of actual housing need in the Borough. The application of a requirement of 275 dwellings per annum for calculating 5-year land supply would be a direct conflict with the Framework's policy to boost housing supply</p> <p>Reduced housing requirement within 5 years of adoption which has no support in the Framework or the PPG is wholly unjustified. The figure of 415 dwellings per annum must be used for the calculation of the 5 year supply, as that is what the Local Plan allocated land to meet, and if there is a shortfall in achieving that requirement, then unallocated sites must be considered. With the 2018 household projections stating an annual increase of 428 households per annum and the draft Local Housing Need of 488 per annum, then as a minimum the 5-year supply must be calculated on 415 dwellings</p> <p>In response to EDPR05 we append (Appendix EP3) our representations to the draft APS which includes our assessment of the sites in the supply. If the Partial Review progresses, then we would update this as part of the Examination</p>	<p>The use of the lower end of the range would be in line with national policy. The FLP32 results in a significant boost to the supply of housing from previously, and the Partial Review supports and maintains the plan in that objective.</p> <p>The introduction of the range for the housing requirement meets housing needs as assessed through the standard method but retains through the upper end support for the allocations and the development strategy of the plan as a whole. It is fully justified.</p> <p>Comment noted. The Council will also provide updates as the current year's Draft APS has been submitted since publication.</p>
Gladman Developments	Consider the revised housing target to be arbitrarily low and at odds with the national imperative to significantly boost the supply of housing	

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	<p>Standard Method, this is the minimum level of housing that the authority would need to accommodate to fulfil the requirements of national planning policy, and is considerably less than the adopted housing requirement of 415 dpa</p> <p>Background Paper seeks to argue that there are no grounds for deviating from the Standard Method or increasing the Council's housing needs above 275 dpa; Gladman take issue with the reasoning provided for this: the affordability ratio element of the current Standard Method largely replaces the market signals uplift contained within previous guidance on assessing a Council's objectively assessed housing needs, and does not remove the ability or need to plan for a higher level of housing where this would support economic growth proposals;</p> <p>The Background Paper reports how the baseline demographic target that underpins the Council's adopted housing target of 415 dpa was 253 dpa, and very similar to the 256 dpa figure that now underpins the Council's Standard Method calculation. However, an important factor in increasing this baseline demographic figure to 415 dpa was the need to plan for additional job growth, yet no consideration appears to have been given to issue when advancing the authority's revised housing target</p> <p>PPG makes clear that it may be appropriate to increase an authority's local housing need figure where this would help to support local growth strategies, or where previous assessments of housing need (such as those contained in a SHMA) are significantly greater than the Standard Method; therefore Council should not deviate from the evidence base that underpinned its current adopted housing target without compelling evidence</p> <p>Proposed revisions to the Standard Method give minimum of 488 dpa, before taking into account any factors that could suggest the need to plan for a higher level; completions totalled 463.490 and 634 dpa in 2017/18. 2018/19 and 2019/20 respectively: supports the need to plan for more than the minimum 275 dpa requirement as in indication of actual housing demand and need in the borough</p> <p>Council's attempt to reduce their housing target is inconsistent with the authority's previous economic aspirations and will only serve to unjustifiably frustrate and prevent the delivery of much needed housing within the borough; questionable why the Council seeking change, having already sought to identify sufficient sites to meet their higher adopted requirement</p> <p>Therefore believe that there are no grounds for departing from or amending the authority's current adopted housing target; rather, the Council should now be looking</p>	<p>Paragraph 60 of the Framework makes clear that the standard method determines the minimum number of homes needed</p> <p>Jobs growth was an element that required consideration in the methodology contained within the defunct PPG that accompanied the superseded NPPF12. The standard method incorporates the impact of jobs growth on demand through both the demographic trends, which reflect previous jobs growth, and the affordability ratio which responds to scarcity in the marketplace by addressing affordability.</p> <p>PPG gives an example of the type of growth strategies meant: <i>"for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals)"</i>; strategic infrastructure is <i>"improvements that are likely to drive an increase in the homes needed locally"</i>. Neither of these apply to Fylde.</p> <p>The draft standard method is a consultation draft. The current standard method is national policy for the Partial Review. The proposed requirement plans for a range of 275-415, not for the minimum. The higher levels of completions have been necessary to make up for shortfall against what was already an increased level of needs in the early part of the plan period: they do not themselves justify a further increase</p>

Respondent	Summary of comment	Council response
	<p>to allocate additional sites and plan for a higher level of housing, to respond to any unmet needs and any increase in Fylde's own housing needs</p> <p>Five Year Housing Land Supply</p> <p>The Council's decision to progress a reduced housing requirement is not justified, therefore figure of 275 dpa should not be used to calculate the authority's five year housing land supply position. Seeking to monitor the Council's performance against such a low target will only serve to restrict the supply of much needed housing within the authority; effects of this restraint on housing delivery will be further compounded by the Council's continued reliance on the 'Liverpool' method for addressing any backlog in the authority's housing land supply calculation. As explained by Inspector Baird in the authority's now quashed 15th January 2020 Annual Position Statement Report:</p> <p><i>"The objective of national planning policy is to "...significantly boost the supply of homes..." and a 5-year HLS is regarded as a minimum position. The shortfall in delivery is not a mathematical exercise, it is real households that require homes now. In this context and given the declining supply of housing land (in Fylde), the continued use of the Liverpool Approach to determine the annual requirement cannot be justified"</i></p> <p>authority should now be looking to address any shortfall via the 'Sedgefield' method, unless there are clear and compelling reasons for continuing to make good any undersupply over the remainder of the Local Plan period. This should be examined through the Partial Review process</p> <p>have some concerns with the way in which the Council has assessed the residual housing requirement that is to be met over the remainder of the Local Plan period to 2032 (Background Paper para 4.8): given that there have now been three additional years of housing completions within the authority, we would suggest that it would now be sensible to update these figures to reflect the latest position (i.e. as of 1st April 2020); should use baseline housing target (e.g. 415 dpa) for the purposes of any five-year housing land supply calculations, with performance monitored against this target on a rolling annual basis: point raised in representations on the Council's Draft 2020 Annual Position Statement: authority's current approach seeks to over-inflate the authority's housing land supply position and incorrectly factors in any undersupply or oversupply against the Council's adopted housing target</p>	<p>The revised housing requirement is a range not a reduction; it will continue to ensure delivery of the housing planned for within the FLP32; it will not frustrate or prevent delivery</p> <p>The housing requirement in the Partial Review is a range, therefore the 5 year supply will be assessed against the lower figure of the range. This will not restrict the supply: the Partial Review will deliver the allocations in the FLP32. It will avoid any situation where the plan is rendered useless through appeal approvals for a less sustainable pattern of development than the plan provides.</p> <p>The report of Inspector Baird was quashed. One of the issues raised against it was the conclusion the Inspector came to in this sentence, where he assessed that the supply of housing land was declining. The reason, which was made available to him but not apparently considered, was that the definition of deliverable had changed, so that inevitably sites previously considered deliverable but not meeting the definition had been removed from the supply, resulting in a reduced calculation. The actual position on sites had not changed. As with Inspector Baird's situation, this does not justify the substitution with the Sedgefield method.</p> <p>These are matters which will be considered in the meantime by the APS Inspector whose recommendation is currently awaited.</p>

Respondent	Summary of comment	Council response
DePol for Concert Living	<p>Housing requirement stipulated in Policy H1 a) and d) should either remain as per the current adopted policy or should be increased; the reference to the 5YR housing supply being assessed using the “Liverpool” method in Policy H1 c) should be deleted</p> <p>When considering Framework paragraphs 212, 213, 214, 33 and 73, together with NPPG, it is evident that there is no requirement under the terms of the Framework to undertake a review the housing requirement set in strategic Policy H1 at this time. In this respect, whilst the Fylde Local Plan housing requirement was not based on a LHN using the standard method, this was clearly considered acceptable through the Framework transitional arrangement. Furthermore, the policy was adopted less than two years ago and whilst the Framework refers to relevant strategic policies potentially needing a review earlier than five years if the applicable LHN figure has changed significantly, NPPG clarifies that this is when the adopted housing requirement is based on a number that is significantly below the number generated using the standard method. As highlighted later, this is not the case in Fylde as the LHN based on the standard method is lower than the current adopted Local Plan requirement.</p> <p>also relevant to note that the standard method is under review and the current proposed amendments, if applied in their current form, would result in a LHN which is not just significantly higher than the LHN based on the current standard method, but is also higher than the current Local Plan housing requirement</p> <p>housing requirement set in Policy H1 of the current adopted Local Plan is based on the LPA’s objectively assessed need (OAN), established through the Fylde Coast Strategic Housing Market Assessment (SHMA). This identified the OAN as being between 410-430 dpa, although despite the SHMA recommending that it should be towards the upper end due to support economic growth in the area, the adopted Local Plan requirement is towards the lower end, i.e. 415dpa. This is the Borough’s recently confirmed objectively assessed need</p> <p>2018 Framework introduced the standard method for calculating local housing need (LHN), but whilst this was published prior to the adoption of the Fylde Local Plan, the Plan was examined against the former version of the Framework due to the transitional arrangement</p> <p>Framework 2019 now states that to determine the minimum number of homes needed strategic policies should be informed by a LHN assessment conducted using</p>	<p>The Partial Review is necessary in respect of NPPF19 paragraph 212 and the FLP32 paragraph 1.27. The scope of the Partial Review undertaken includes the housing requirement.</p> <p>The need for review is not relevant; the Council has chosen to incorporate the revision into its Partial Review, in order to have regard to the minimum local housing need assessed through the standard method.</p> <p>The consultation draft standard method is only that. There is no certainty what form it will take, if taken forward at all. The Partial Review has been prepared and consulted on with the current standard method in place as national policy.</p>

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	<p>the standard method; PPG provides guide and formula; LPA's Housing Needs and Requirement Background Paper (HNRBP) refers to the LHN being 275 dpa</p> <p>However PPG para 010 Reference ID: 2a-010-20190220 notes the standard method provides "a minimum starting point" in determining the number of home needed and does not attempt to predict the impact that future Government policies, changing economic circumstances or other factors might have on demographic behaviour. It confirms that there may be circumstances where it is appropriate to consider whether "actual housing need is higher than the standard method indicates". The NPPG goes on to identify the sort of circumstances where this may be the case and these are considered to apply to Fylde: where increases in housing need are likely to exceed past trends because of growth strategies: Warton Enterprise Zone has the potential to boost the demand for housing within the Fylde, over and above the Standard Method; where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method: LPA's net annual completions over the last 3 years since 2016/17 have been 455 dwellings, 470 dwellings and 490 dwellings, before was lower but in context of previous plan being time expired; clear steer from NPPG that the standard method figure of 275dpa should only be treated as the minimum starting point.</p> <p>To simply treat the minimum starting point as the new housing requirement, despite it being substantially below a recently adopted Local Plan figure and actual annual completions over the last 3 years, contradicts the Government's commitment to significantly boost the supply of housing (paragraph 59) and the requirement to address potential barriers to investment</p> <p>Notes consultation on revised standard method: consultation document reaffirms that the standard method only provides the starting point for planning for housing and does not establish the housing requirement. It also reaffirms in paragraph 8 that after identifying the minimum number of homes using the standard method, local areas should consider whether local circumstances mean that actual need is higher than that minimum; states that: <i>"Household projections, used in the current method, have attracted criticism for their volatility and the way in which they can result in artificially low projections in some places, where overcrowding and concealed households suppress the numbers. Crucially, they cannot in isolation forecast housing need – they project past trends forward. Despite this, we have seen many progress arguments that recent reductions in projected growth should lead to less homes being</i></p>	<p>The Framework does not require the assessment to go beyond the standard method.</p> <p>The EZ at Warton has not delivered any significant growth to date, with the focus on other parts of Lancashire.</p> <p>These levels of delivery have been achieved and were necessary to make up the shortfall due to lower delivery in the early part of the plan period. They do not themselves justify a further increase.</p> <p>It is not "the new housing requirement". The Partial Review expresses the housing requirement as a range. The plan retains all allocations from the FLP32.</p> <p>This document has been released for consultation and cannot at present be considered policy.</p>

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	<p><i>built. This should not be the logical conclusion, as the Office for National Statistics (ONS) has clarified.</i>" Revised standard method for Fylde 488 dpa.</p> <p>Proposed amendments will do nothing to help the Framework objective to boost the supply of homes, but they will strengthen the LPA's position with regards to avoiding the Framework paragraph 11d 'titled balance', which is a Government measure partly aimed at helping address under delivery of housing, which is clearly evident from footnote 7; and remove the opportunity to allocate additional land in the Local Plan review to meet any needs for Fylde or neighbouring authorities which may arise based on the proposed amendments to the standard method.</p> <p>With regards to the 5YR supply, PPG states the 5YR supply will be measured against the lower end of the range. Accordingly, in Fylde the 5YR housing supply would switch from being considered against the current adopted Local Plan requirement of 415dpa to the much lower 275dpa figure for five years following adoption of the Partial Review; could result in a scenario where the LPA does not have a deliverable 5YR housing supply based on the current adopted Local Plan requirement and the LHN based on standard method version 2, but is deemed to have a deliverable 5YR supply due to the lower figure in the Local Plan. The housing delivery test would also continue to be measured against the much lower figure of 275 dpa</p> <p>Missing the opportunity to allocate land to address housing need: if SM version 2 resulted in a LHN of 488 dpa, would equate to a minimum additional need of 949 homes to 2032 over Policy H1; unknown implication the new SM will have on Wyre and Blackpool; whilst the Wyre Local Plan was adopted in February 2019 it did not result in a clear quantification of unmet housing need (to be met elsewhere) and this matter still requires further examination through its own immediate partial review. Partial Review at this stage therefore prevents the opportunity to consider whether additional housing land ought to be allocated should the revised SM indicate a significantly increased LHN. Indeed it makes no logical sense for the LPA to use Framework paragraph 212 and paragraph 1.27 of the current Local Plan and to try and justify a partial review now, rather than waiting to assess the outcome of the standard method review.</p> <p>Whilst the LPA would have the option to undertake another review of the Local Plan in due course to reflect any changes to the standard method, their historical actions in this regard do not suggest this is likely to occur.</p>	<p>The effect will be to support the delivery of the FLP32 as amended by the Partial Review and specifically all of the allocations within it, which have the effect of boosting significantly the supply of homes above previously achieved levels.</p> <p>The representor cannot be certain what the LHN under any revised standard method will actually be.</p> <p>This is supposition. The draft revised standard method may change or be withdrawn, and if carried forward, the figure calculated is volatile from year to year. The Council is bringing forward its Partial Review based on current national policy, rather than trying to guess the future outcome.</p> <p>The Council does not accept that it should abandon the Partial Review based on what might happen, but equally might not.</p> <p>Not relevant</p>

Respondent	Summary of comment	Council response
	<p>prior to the current Local Plan being adopted in 2018 Fylde were reliant on the 1996-2006 Fylde Local Plan which was adopted in May 2003 and did not identify any housing allocations. The defined settlement limits in this previous Plan were drawn in a restrictive manner as the strategic housing requirement over the remaining plan period had already been met by existing commitments. Whilst the Council subsequently adopted the 2004-2016 Local Plan Alterations Review in 2005, this was only a partial review and made no housing allocations and instead introduced an effective moratorium on new residential development</p> <p>(RSS) changed the housing position in Fylde. The RSS identified a higher annual housing requirement for Fylde between 2003-2021. Consequently, the former Local Plan not only had no housing allocations or a development strategy in place to deliver the RSS housing requirement, with there being a complete reliance on windfall development, but the defined settlement boundaries had been drawn in a restrictive manner on the basis that new housing was to be strictly regulated. Ever since the publication of the RSS in 2008 it was evident that significant edge of settlement greenfield development was required if the Borough's housing needs were to be delivered. This was the clear opinion of the Council's own Planning Policy Team and had been accepted in numerous s.78 appeals</p> <p>Despite having a clearly out of date Local Plan and a continually rising housing shortfall, Fylde did not make any noticeable progress on a review of the Local Plan for a number of years, not adopting a replacement plan until 10 years later in 2018. In the meantime, they continued to refuse large housing developments, forcing applicants to obtain permission via s.78 appeals. At Appendix 1 is a table showing those housing sites which had to be granted on appeal, which total 2,685 dwellings. Most of these sites ended up being identified as housing allocations in the current Local Plan adopted in 2018</p> <p>LPA have undertaken a quick partial review of the 2018 Local Plan, but this is evidently on the basis that it provides them with an opportunity to introduce a lower housing requirement figure. For reasons previously highlighted, it is considered that if the partial review is approved the LPA are unlikely to undertake another quick review of the Plan to reflect an increase in the LHN based on a subsequent change to the standard method. They are more likely to rely on Framework paragraph 73 to protect themselves from having to address a housing shortfall for the next five years</p> <p>Conclusion: unsound because:</p>	<p>Not relevant</p> <p>Not relevant</p> <p>It is for the Council to determine when to make a plan, within the Framework of national policy/legislation and any provisions in place on the previous plan, as it has done in response to NPPF19 paragraph 212 and FLP32 paragraph 1.27</p> <p>The housing requirement is proposed to be a range, not reduced.</p>

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	<p>not positively prepared: require strategy which, as a minimum, seeks to meet the area's objectively assessed needs. The standard method is only a minimum; the LPA have failed to take into account factors which indicate that a higher requirement than the standard method is appropriate. Using a partial review of the Local Plan to reduce the housing requirement in a recently adopted Local Plan, based solely on a standard method which itself is currently under review and likely to result in an increase in the LHN, cannot reasonably be considered to pass the test of being 'positively prepared'</p> <p>not Justified. must be an appropriate strategy, taking into account the reasonable alternatives. The strategy of inserting range into the recently adopted Local Plan by adding a lower housing requirement figure is not justified when considering the alternatives; could simply leave and not insert the lower figure: the proposed amendment offers nothing positive in terms of meeting the Framework objective to significantly boost the supply of housing; could be to amend the housing requirement upwards to reflect the revised version of the standard method and allocate additional housing land: would reflect the Framework objective of significantly boosting the supply of housing. Either alternative is preferable and more line with Framework policy than the proposal in the partial review.</p> <p>not consistent with national policy: reduction requirement to 58% of the average completion rate over the last 3 years and just 66% of the recently adopted Local Plan requirement, is not consistent with the Framework objective to significantly boost the supply of housing; particularly based on a standard method which is under review and likely to result in a minimum LHN which is even higher than the current Local Plan requirement. The partial review is a blatant attempt by the LPA to try and introduce a safeguard against the Framework 'tilted balance', thereby removing a core element of the Framework's approach to helping address housing under delivery and boost significantly the supply of housing</p> <p>As the LPA are reviewing Policy H1 it is appropriate to consider the entirety of the policy and it is considered that the reference in criterion c) to the 5YR supply being based on the "Liverpool approach" should be removed</p> <p>When the LPA's Annual Position Statement was published in January 2020, the Inspector acknowledged that the Local Plan referred to the past shortfall in delivery being addressed across the remaining Plan period (Liverpool) and that this had been found sound. However, the APS Inspector stated in paragraphs 12 to 14 of the report that:</p>	<p>The current standard method is the national policy in force at Publication.</p> <p>The requirement is a range not a reduction. All allocations from the FLP32 are taken forward. The boost to the supply provided by the FLP32 will be maintained by the Partial Review.</p> <p>The use of the Liverpool approach was found sound and remains a critical element of the policy for its effectiveness</p> <p>The reasoning given by the Inspector was puzzling. Because of the change of definition of deliverable, the calculation had fallen (but was still over 5 years) (and circumstances on</p>

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	<p><i>12. In July 2017, the LP examination was advised that the Council had a 5-year housing land supply (HLS) whether the Sedgefield (5.1-years) or the Liverpool Approaches (6.4- years) were used. However, in September 2017, the Council indicated that the 5-year HLS had dropped to 4.9-years using the Sedgefield Approach or 6.2-years using the Liverpool Approach. The Examining Inspector accepted that the past shortfall could be addressed over the remainder of the plan period in order that the Local Plan delivered a 5-year HLS at the adoption of the LP. To do otherwise would have resulted in the LP being found unsound</i></p> <p><i>13. Notwithstanding the recent adoption of the LP, the APS, continuing to adopt the Council's approach to determining the components of the requirement and supply, shows that the HLS supply has reduced from 6.2 years to 5.3 years. Despite this material reduction, the Council does not appear to have taken any particular action to address the decline.</i></p> <p><i>14. The objective of national housing policy is to "...significantly boost the supply of homes..." and a 5-year HLS is regarded as a minimum position. The shortfall in delivery is not a mathematical exercise, it is real households that require homes now. In this context and given the declining supply of housing land, the continued use of the Liverpool Approach to determine the annual requirement cannot be justified".</i></p> <p>The APS Inspector's report therefore applied the Sedgefield method. This report was subsequently quashed and reconsidered, but this was on the basis that APS Inspectors are not entitled to reconsider strategic policies in recently adopted plans or to re-assess the approach to past under-delivery. This partial review of the Local Plan now provides an opportunity to reconsider this matter. For the reasons highlighted by the APS Inspector in the original report, it is considered that the Sedgefield approach is more consistent with the Framework and that the Liverpool method is contrary to the objectives of the Framework. This is particularly the case where the LPA are proposing to insert a lower housing requirement figure and where the review of the standard method could indicate an even higher Local Housing need than the current adopted Local Plan.</p>	<p>the ground on the relevant sites had not changed at all) yet the Council was supposed to have, between finishing the calculation of the supply (late May) and submitted the Draft APS (July), somehow acted to correct the change in supply: retrospectively, as the base date had passed. In the absence of this, the Inspector summarily acted to strike out an adopted element of policy.</p> <p>The reasoning provided by the FLP32 Inspector remains relevant now, and this element of policy is not proposed for alteration</p>

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Emery Planning for Hollins Strategic Land	<p>In light of the adopted requirement in Policy H1 and the draft Local Housing Need figure of 488, it is clear that a figure of 275 dwellings is a suppression of actual housing need in the Borough. The application of a requirement of 275 dwellings per annum for calculating 5-year land supply would be a direct conflict with the Framework's policy to boost housing supply</p> <p>Reduced housing requirement within 5 years of adoption which has no support in the Framework or the PPG is wholly unjustified. The figure of 415 dwellings per annum must be used for the calculation of the 5 year supply, as that is what the Local Plan allocated land to meet, and if there is a shortfall in achieving that requirement, then unallocated sites must be considered. With the 2018 household projections stating an annual increase of 428 households per annum and the draft Local Housing Need of 488 per annum, then as a minimum the 5-year supply must be calculated on 415 dwellings</p> <p>In response to EDPR05 we append (Appendix EP3) our representations to the draft APS which includes our assessment of the sites in the supply. If the Partial Review progresses, then we would update this as part of the Examination</p>	<p>The use of the lower end of the range would be in line with national policy. The FLP32 results in a significant boost to the supply of housing from previously, and the Partial Review supports and maintains the plan in that objective.</p> <p>The introduction of the range for the housing requirement meets housing needs as assessed through the standard method but retains through the upper end support for the allocations and the development strategy of the plan as a whole. It is fully justified.</p> <p>Comment noted. The Council will also provide updates as the current year's Draft APS has been submitted since publication.</p>
Cassidy & Ashton for Home Farm	We repeat reference to the impacts of Covid 19 in respect of an impact to delivery rates which are likely to be exacerbated over several years as the economy seeks to recover. Additional land should be identified under Policy H1	Respondents to the Draft APS provided only limited evidence of effect on delivery rates which is incorporated into the trajectories and does not justify further action
Pegasus Group for Hallam Land Management Ltd	<p>5-Year Supply Position: recently adopted APS from 6th May 2020, confirming that they could demonstrate a 5.1 year supply of deliverable housing sites at 1st April 2019; submitted draft APS for 2020 following consultation in June 2020, which claims a 6.01 year supply (which we believe should be 6.06 years due to a counting error); given this document carries forward the methodology and delivery assumptions endorsed by the Inspector back in May 2020 on the previous APS (which has also been through the High Court) we do not wish to dispute the detailed findings on five year supply, nor did we make any representations to the June 2020 consultation</p> <p>That said, we do have some more general comments on the full plan period supply and how that might impact the 5 year supply position going forward: FLP32 shows total plan period supply of 8,819 dwellings, just exceeds the higher requirement range (8,715 leaving a surplus of just 1.2%), arguable whether sufficient, allows very little</p>	<p>Comment noted</p> <p>The matter of whether a buffer should be added to the whole supply was discussed at the FLP32 examination. The Inspector agreed with the Council that it should be not be required to plan for 110% of its requirement.</p>

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	<p>flexibility in terms of providing a choice of sites, or accounting for under delivery: advocate 10%; notwithstanding this, the June 2020 Draft APS full plan trajectory indicates a total plan period supply of just 8,401 at 1st April 2020,5 which represents a shortfall of 314 homes or 3.6% of this upper range requirement, which is clearly insufficient. If the revised standard method figure is used from 2020 onwards the total requirement is 9,591 so shortfall increases to 1,190 or 14%. This confirms that the Local Plan Review will need to allocate more sites to meet both its adopted and emerging requirement.</p> <p>Ongoing 5-Year Supply through Plan Period: provides table mapping out 5-year supply across the plan period based on the trajectory in the June 2020 Draft APS set against existing and emerging requirement scenarios [see Text of Representations Made Under Regulation 20 in Policy Order or original representation in Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) document]: in summary, it is clear from the table that supply will drop below 5 years as early as 2022 under the government's proposed methodology (Scenarios 3/ 488 dpa) and by 2024 under the adopted figure (Scenario 2); and the position is even worse if historic shortfall is taken into account or if a higher buffer were to be applied</p> <p>Furthermore, whilst the Council have sought to take account of the impacts of COVID as much as possible within their latest delivery rates, based on discussions with developers; this evidence was gathered during the early stages of the pandemic before the full impacts were known, both in terms of market demand and construction timetables, and therefore it is likely that circumstances will have changed, which will more than likely lead to an overall reduction in delivery rates</p> <p>This confirms that the Local Plan Review will need to allocate sites to shore up supply in the latter parts of the plan period, both in Warton and across Fylde to deliver the requirement in full and to maintain an ongoing 5-year supply</p> <p>Total Requirement: using the emerging standard method figure of 488 dpa from 2020 onwards, generates a total plan period requirement of 9,591 dwellings, which increases to 10,550 if a 10% headroom is applied to allow for choice and flexibility as suggested above. This would require land for an additional 2,149 dwellings being identified within the plan review to 2032 to meet Fylde's needs alone, and even more to take account of unmet need in the adjacent Fylde Coast authorities, or if the plan period were to be extended to cover 15 years from adoption as recommended; even</p>	<p>Delivery in the trajectory has been pushed back on some sites owing to the new deliverability test, increasing the number of dwellings delivered beyond the plan period. In practice the Council anticipates delivery on these to move forward sooner, but the trajectory is in line with national policy for submission with the APS.</p> <p>The consultation draft standard method is not current national policy.</p> <p>The trajectory in the Draft APS includes a 10% buffer within the 5 year period. Whilst the trajectory has to provide for the 10% within the supply on sites, it is not necessary for the 10% to be delivered, as it is not part of the requirement. Therefore, the table, by assuming it will be delivered, understates the position that the Council will have in each year following the first. The trajectory is reproduced anew each year, reflecting actual delivery.</p> <p>The interest of this and several other representors in bringing forward additional sites and their description of high levels of demand supported by recent delivery rates requiring a higher housing requirement, suggests that the impact of COVID-19 is likely to have very limited impact.</p> <p>The consultation draft standard method remains only a draft. The results it generates are volatile. The Council has brought forward the Partial Review in accordance with current national policy. The suggested requirement set out by the representor is not appropriate or necessary, rather it is a "what if?" scenario.</p>

Respondent	Summary of comment	Council response
	<p>continuing with the adopted figure of 415 dpa, with 10% headroom, would require a total supply of 9,587, requiring land for a further 1,186 dwellings to be identified.</p> <p>Windfall: the Council propose a windfall rate of 40 dpa going forward (from the latter 2 years of the 5 year period), based on historic delivery and consents, which equates to 360 across the final 9 years of the plan period. Whilst this was endorsed by the Local Plan Inspector back in 2018, we raise two concerns with this going forward. Firstly, we would expect windfall delivery to naturally fall away in the coming years due to an inevitable decrease in land availability, with more land already being allocated or consented; whilst the presence of newly adopted policies and a confirmed 5-year supply will also make it more challenging to gain consent on unallocated sites. Secondly, COVID is likely to have a disproportionate impact on smaller, windfall type development, due to tightened lending/ mortgage criteria for smaller developers and private individuals who would traditionally bring this sort of development forward; as well as the potential for reduced demand in the medium term</p> <p>The impact of COVID is likely general reduction in delivery: significant impact in Fylde, given its reliance on a small number of very large sites, if any were not taken forward or slip could have a significant impact on overall delivery; accepted that the major national housebuilders should have sufficient resources, finance mechanisms and technical expertise to continue; however it may not be as easy for private developers who have fewer technical resources and face tighter lending restrictions: example is Queensway (HSS1), (948 dwellings) being built out by a private developer Kensington Developments: delivery could reduce significantly or fall away entirely if they cannot secure ongoing funding or contractors who cannot remain viable with distancing restrictions in place</p> <p>Suggested Revisions to Plan: that the Council adopt the emerging standard methodology figure (which currently stands at 488 dpa) from 2020 onwards, and apply a 10% supply buffer on top of this to allow for choice and flexibility. This generates a total plan period requirement of 10,550 to 31st March 2032 and based on current trajectory will require land for additional 2,150 dwellings; also need to consider unmet needs across the Fylde Coast HMA, where the requirement is also likely to increase as a result of the revised standard methodology, particularly given the well known supply constraints in both Wyre and Blackpool; we recommend that policies DLF1 and H1, and the relevant supporting text in chapters 1, 5 and 9 is updated on this basis.</p>	<p>Windfall sites in Fylde are typically small and on previously-developed land. The trajectories supporting the APS include those currently permitted and illustrate the typical sites included. The Council see no reason that the supply of such sites will reduce, and the inclusion of the allowance has been supported by the APS inspectors.</p> <p>The Council is aware of no evidence supporting the contention that there is tightening of lending to small developers.</p> <p>There is no evidence that any of the strategic development sites will not be taken forward.</p> <p>The revisions suggested here are not considered necessary for the soundness of the Partial Review</p>

Respondent	Summary of comment	Council response
Paragraph 9.22: land available to deliver range		
Lambert Smith Hampton for AXA	<p>we believe that this review offers an opportunity to consider further potential allocations of land</p> <p>Note objectives of White Paper to support home ownership and increase the supply of land available for new homes where it is needed to address affordability pressures, support economic growth and the renewal of our towns and cities, and foster a more competitive housing market</p> <p>We believe that there is an affordability issue within the Fylde and that more housing should be provided to allow for an increase in housing land supply as envisaged in the Government's white paper</p> <p>Highlight NPPF para 59: sufficient amount and variety of land</p>	<p>The revisions in the Partial Review do not require the allocation of additional land.</p> <p>The Partial Review supports the FLP32's significant boost to the supply of homes.</p> <p>The affordability ratio is a component of the standard method which the Council has used to identify needs. Fylde's is 5.43 which is lower than the figure for Lancashire overall (5.65)</p>
Paragraph 9.24: cross-reference to Monitoring Framework		
	No representations received in relation to this section	
Paragraph 9.49: residential gardens		
	No representations received in relation to this section	
Paragraph 9.57: alternative uses		
	No representations received in relation to this section	
Paragraph 9.58 demand for land		
Lambert Smith Hampton for AXA	<p>We note that within the partial review it is not intended to revise the protection of existing employment sites. If this approach is to be adopted, then land which is not identified for employment uses should be considered for allocation for housing development. AXA is willing to bring its sites forward for development.</p>	<p>Unallocated sites can be windfall development sites if compliant with the policies of the plan. The Partial Review does not seek to allocate sites.</p>

Respondent	Summary of comment	Council response
Paragraph 9.67: affordable housing		
Cassidy & Ashton for Home Farm	It is acknowledged that the annual affordable housing requirement is 249 dwellings but that this cannot be achieved. However, the delivery of affordable housing should remain a key aspiration and it should be acknowledged that these are more likely to be delivered through strategic development sites.	It is recognised that the strategic allocations play the major role in delivering affordable housing in the Borough
Policy H6: Isolated New Homes in the Countryside		
	No representations received in relation to this section	
Paragraph 11.1: Infrastructure		
	No representations received in relation to this section	
Paragraph 11.2: definition of infrastructure		
	No representations received in relation to this section	
Paragraph 11.7: new infrastructure		
	No representations received in relation to this section	
Paragraph 11.12: IDP		
	No representations received in relation to this section	
Paragraph 11.59: parking standards		
Bryning-with-Warton Parish Council	These parking standards now need strict adherence in all future developments and it is a welcome revision although disappointing that as a planning Authority Fylde has been slow to advance such important issues in recent years.	Comment noted

Respondent	Summary of comment	Council response
Policy ENV1 Landscape		
Bryning-with-Warton Parish Council	Coastal Change Management Area Positive support for revision from "'does not adversely affect..." to "Promotes".	Support welcomed
Paragraph 13.6: valued landscapes deleted		
	No representations received in relation to this section	
Paragraphs 13.16 and 13.17: tranquil areas		
	No representations received in relation to this section	
Policy ENV2 Biodiversity: nature conservation sites and ecological networks		
Story Homes	Story Homes supports the inclusion of biodiversity net gains in Policy ENV2 given its prominence in the emerging Environment Bill. Whilst its inclusion is supported it is considered that details on the qualitative aspect of net gain should be included within the revisions. This will give greater clarity to developers and landowners alike and ensure policy compliance with emerging planning applications. Story Homes welcomes greater clarity on this.	The Council welcomes support for the inclusion of Biodiversity Net Gain in ENV2. The scope of the partial review only included changes made to the NPPF and Wyre's unmet need. The revised NPPF does not include details on the qualitative aspect of net gain. However, these are included in the Planning Practice Guidance at paragraphs 020 Reference ID:8-020-20190721 to 027 Reference ID:8-020-2019721.
Pegasus Group for Hallam Land Management Ltd	HLM are wholly supportive of protecting and enhancing biodiversity as part of development proposals. However, where net gain is not achievable on-site, the Council will need to find alternative sites and projects where biodiversity improvements can be made, such that applicants can off-set their impacts through financial contributions. It is suggested that such schemes are secured and costed at the earliest possible time, to provide accurate financial obligations for applicants that meet the relevant CIL tests, otherwise this could lead to delays in developments coming forward	The obligations for Biodiversity Net Gain are set out in the Planning Practice Guidance at paragraph :023 Reference ID :8 023-20190721. Net gain in planning describes an approach to development that leaves the natural environment in a measurably better state than it was beforehand. Benefits could be achieved entirely on site or by using off site gains where necessary. This response goes beyond the scope of the Partial Review of the FLP32.

Respondent	Summary of comment	Council response
Policy ENV2 Biodiversity: Priority Species Protection		
	No representations received in relation to this section	
Paragraph 13.29: monitoring		
	No representations received in relation to this section	
Paragraph 13.36: strategic approach		
	No representations received in relation to this section	
Policy ENV3 Protecting Existing Open Space (Part of the Green Infrastructure network)		
Sport England	Sport England have no comments in relation to the reference changes to the NPPF (2019) as suggested throughout the document and agree with the references made to paragraph 96 and 97.	Support noted
Paragraph 13.52: heritage assets		
	No representations received in relation to this section	
Paragraph 13.59: local heritage		
	No representations received in relation to this section	
Glossary: affordable housing		
	No representations received in relation to this section	
Glossary: Infrastructure		
	No representations received in relation to this section	
Glossary: National Planning Policy Framework (The Framework)		
	No representations received in relation to this section	

Respondent	Summary of comment	Council response
Appendix 1: FBLP Policy EMP5		
	No representations received in relation to this section	
Appendix 1: FBLP Policy TREC5		
	No representations received in relation to this section	
Appendix 1: FBLP Policies TREC15 and TREC16		
	No representations received in relation to this section	
Appendix 1: FBLP Policy EP26		
	No representations received in relation to this section	
Appendix 1: FBLP Policy EP27		
	No representations received in relation to this section	
Appendix 1: FBLP Policy EP28		
	No representations received in relation to this section	
Appendix 1: FBLP Policy EP30		
	No representations received in relation to this section	
Appendix 1: FBLP Policies SH13 and SH14		
	No representations received in relation to this section	
Appendix 1: FBLP Policy SH15		
	No representations received in relation to this section	

Respondent	Summary of comment	Council response
Appendix 1: FBLP Policy CF8		
	No representations received in relation to this section	
Appendix 8 Performance Monitoring Framework Indicator 1		
	No representations received in relation to this section	
Appendix 9: Evidence Base: General		
	No representations received in relation to this section	
Identification of Strategic Policies (Appendix 1 to the Schedule of Revisions)		
	No representations received in relation to this section	

4. Summary Statement of Main Issues

4.1 The Council considers the following to be the main issues in respect of the Partial Review raised in the representations. It should not be read as an exhaustive list of matters the Inspector may wish to consider.

- It does not use the latest housing projections and therefore is not based on the most up-to-date housing need figure;
- There would be a reduction to the housing requirement in relation to recent housing delivery;
- There is no justification for a range for the housing requirement and the upper end looks like a cap;
- There are matters of disagreement in the Statement of Common Ground and Wyre Council has suggested joint working, which the Council does not appear to have considered;
- There is a reduction in the housing requirement which is contrary to national policy of “significantly boosting the supply of homes”;
- The housing requirement should be increased according to the new draft methodology and a buffer added;
- Extra housing sites should be allocated to meet such an increased requirement;
- There is a risk of a need for a further review in relation to Wyre’s unmet need, which is still unmet;
- Objection to the Sustainability Appraisal and its assessment that there are “no reasonable alternatives”;
- No uplifts have been added to the housing need figure as there were for the SHMA figure: provision should be made for housing growth to reflect the significant job growth at the Blackpool Airport Enterprise Zone and/or the Warton Aviation Enterprise Zone ; and the need figure should provide for additional affordable housing need which has not been reassessed;
- Use of the Sedgefield method for the 5-year supply calculation would now be appropriate given recent delivery;
- It should cover a 15-year period from adoption and allocate sites to provide for it;
- It has not been properly publicised;
- The Statement of Common Ground lacks status;
- There is a shortfall in the plan period against the existing adopted housing requirement figure, therefore additional sites are needed anyway;
- The Partial Review as a whole lacks justification and therefore should be withdrawn.

Appendix 1 Regulation 19 Consultation Materials



ADDRESS LINE 1
ADDRESS LINE 2
ADDRESS LINE 3
ADDRESS LINE 4
ADDRESS LINE 5
ADDRESS LINE 6
ADDRESS LINE 7

Our Ref: PR Publication

Your Ref:

Please Ask For: Julie Glaister

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 21 July 2020

Dear Sir/Madam

Partial Review of the Fylde Local Plan to 2032: Public Consultation
The Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 19

This is to notify you that the Partial Review of the Fylde Local Plan to 2032 (PRFLP32) will be published for consultation, along with accompanying documents, for six weeks from 23 July 2020 until 5pm on 3 September 2020.

The Partial Review of the Fylde Local Plan to 2032 is not a complete review of the Local Plan. It makes proposed revisions to the Local Plan to deal with two issues:

- The need to ensure that the Local Plan remains in accordance with national planning policy, following the publication of the new National Planning Policy Framework in February 2019;
- The need to examine the issue of unmet housing need in Wyre, in line with the commitment in paragraph 1.27 of the Local Plan, and following the adoption in February 2019 of the Wyre Local Plan (2011-2031) with unmet housing need.

The Partial Review of the Fylde Local Plan to 2032 is published in the form of the Schedule of Revisions to the FLP32.

Representations are invited on the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32. This schedule sets out the revisions to the Local Plan which the Council wishes to adopt. Previously, the Council consulted on the scope of the Fylde Local Plan to 2032 Partial Revision, and representations received on that consultation have been taken into account in producing this schedule. Following this publication consultation, the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 will be submitted, together with the representations received in this publication consultation, to the Secretary of State for Examination.

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

The proposed submission documents are:

- SDPR01 - The Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32;
- SDPR02 - The Sustainability Appraisal and Strategic Environmental Assessment;
- SDPR03 - The Habitats Regulations Assessment Screening Report;
- SDPR04 - The Economic Viability Assessment Review 2020;
- SDPR05 - The Draft Statement of Common Ground;
- SDPR06 - The Health Impact Assessment Screening;
- SDPR07 - The Statement of Consultation; and

Evidence documents used for the preparation of the Partial Review of the FLP32:

- EDPR01 - Fylde Local Plan to 2032
- EDPR02 - Implications of NPPF19 for FLP32
- EDPR03 - References to NPPF12 in FLP32
- EDPR04 - Housing Needs and Requirement Background Paper 2020
- EDPR05 - Five-Year Housing Land Supply Annual Position Statement February 2020
- EDPR06 - Fylde Council Authority Monitoring Report (2016-2019)
- EDPR07 - Fylde Council Housing Land Availability Schedule 2019
- EDPR08 - Fylde Council Business and Industrial Land Schedule 2016-2018
- EDPR09 - Schedule of Evidence
- EDPR10 - Updates to Evidence

All of the above documents are available for inspection on the Council's website at <https://new.fylde.gov.uk/council/consultation/> and at the Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW. If you wish to view a hard copy of the documents, please email planningpolicy@fylde.gov.uk and provide your telephone number so that we can contact you to make an appointment. A mutually agreeable time will be arranged for you to arrive at the Town Hall to view the documents in a meeting room close to the reception area. If you are shielding, we can arrange to make a document available to you. All appointments will be carried out in accordance with COVID19 guidelines. Unfortunately, this means that there will be no face to face appointments, but a phone number will be provided so that you can speak to a Planning Officer if required.

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

Yours faithfully

Julie Glaister

Julie Glaister
Planning Policy Manager

Fylde Council

Public Consultation

Town and Country Planning (Local Planning) (England) Regulations 2012: Regulation 19/20

Partial Review of the Fylde Local Plan to 2032 (FLP32)

The Council is consulting on the Partial Review of the FLP32 for six weeks from 23 July 2020 to 5.00pm on the 3 September 2020.

Representations are invited on the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32. This schedule sets out the revisions to the Local Plan which the Council wishes to adopt to ensure the Plan remains in line with national policy, as well as examining the issue of Wyre's unmet housing need. Previously, the Council consulted on the scope of the Partial Revision of the FLP32, and representations received on that consultation have been taken into account in producing the Schedule of Revisions. Following this publication consultation, this version of the Partial Review of the FLP32: Schedule of Revisions to the FLP32 will be submitted, together with the representations received in this publication consultation, to the Secretary of State for Examination in Public.

The proposed submission documents are:

- SDPR01 - The Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32;
- SDPR02 - The Sustainability Appraisal and Strategic Environmental Assessment;
- SDPR03 - The Habitats Regulations Assessment Screening Report;
- SDPR04 - The Economic Viability Assessment Review 2020;
- SDPR05 - The Draft Statement of Common Ground;
- SDPR06 - The Health Impact Assessment Screening;
- SDPR07 - The Statement of Consultation; and

Evidence documents used for the preparation of the Partial Review of the FLP32:

- EDPR01 - Fylde Local Plan to 2032
- EDPR02 - Implications of NPPF19 for FLP32
- EDPR03 - References to NPPF12 in FLP32
- EDPR04 - Housing Needs and Requirement Background Paper 2020
- EDPR05 - Five-Year Housing Land Supply Annual Position Statement February 2020
- EDPR06 - Fylde Council Authority Monitoring Report (2016-2019)
- EDPR07 - Fylde Council Housing Land Availability Schedule 2019
- EDPR08 - Fylde Council Business and Industrial Land Schedule 2016-2018
- EDPR09 - Schedule of Evidence
- EDPR10 - Updates to Evidence

The documents can be viewed at: <https://new.fylde.gov.uk/council/consultation/>

The documents are also available for inspection at Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW. If you wish to view a hard copy of the documents, please email planningpolicy@fylde.gov.uk and provide your telephone number so that we can contact you to make an appointment. A mutually agreeable time will be arranged for you to arrive at the Town Hall to view the documents in a meeting room close to the reception area. If you are shielding, we can arrange to make a document available to you. All appointments will be carried out in accordance with COVID19 guidelines. Unfortunately, this means that there will be no face to face appointments, but a phone number will be provided so that you can speak to a Planning Officer if required.

Comments should be made in accordance with the Statement of Representations Procedure, which is available for inspection with the documents above. They should be made in writing, either by email to planningpolicy@fylde.gov.uk, or by post to Planning Policy, Planning Department, Fylde Council, Town Hall, St Annes Road West, Lytham St Annes, FY8 1LW, to be received by the deadline of 5pm on 3 September 2020. All comments will be published, apart from the name of the sender, no other personal information will be publicly available. Anonymous comments will not be accepted.

Mark Evans

Head of Planning and Housing
23rd July 2020

Partial Review of the Fylde Local Plan to 2032

Statement of Representations Procedure and Availability of Documents

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

Title of Document

Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32.

Subject matter and area covered

Fylde Borough Council has prepared the Partial Review of the Fylde Local Plan to 2032 for submission to the Secretary of State for Housing, Communities and Local Government. The Partial Review is presented as a Schedule of Revisions to the FLP32. It identifies only the revisions necessary to ensure that the Local Plan remains compliant with National Policy, following the publication of the new National Planning Policy Framework (February 2019), and to examine the matter of unmet need in Wyre, in accordance with paragraph 1.27 of the FLP32.

Period of publication for representations

Representations are invited on the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 for a period of six weeks, starting from 23 July 2020 and ending at 5pm on 3 September 2020. This statement provides details on how to make representations.

Where to view the documents (statement of fact)

Until 5pm on Thursday 3 September, copies of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 and its accompanying documents, will be available to view on the Council's website at <https://new.fylde.gov.uk/council/consultation/> and will also be available for inspection at the Town Hall, St. Annes Road West, Lytham St Annes, Lancashire FY8 1LW. If you wish to view a hard copy of the documents, please email planningpolicy@fylde.gov.uk and provide your telephone number so that we can contact you to make an appointment. A mutually agreeable time will be arranged for you to arrive at the Town Hall to view the documents in a meeting room close to the reception area. If you are shielding, we can arrange to make a document available to you. All appointments will be carried out in accordance with COVID19 guidelines. Unfortunately, this means that there will be no face to face appointments, but a phone number will be provided so that you can speak to a Planning Officer if required.

Representations

Representations should be made electronically in writing where possible. Email responses should include the name and address of the sender. For respondents who do not have access to electronic means of communication, response by letter will be accepted.

In either case, the representation should relate directly to the content of the Schedule of Revisions to the FLP32. Representations should follow the sequence of the revisions within the schedule. Side headings should be used to indicate the policy or paragraph number of the revision being referred to. General comments should be avoided, in order to ensure that comments are related to matters relevant to the subsequent examination by a Planning Inspector. If you are objecting to the Partial Review of the Fylde Local Plan to 2032 and wish to speak at the examination, it is imperative that you make this clear in your representation.

Notification request

When making your representation you can request to be notified of any of the following:

- The submission of the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 to the Secretary of State for Communities and Local Government for examination;
- Publication of the Planning Inspector's Report on the Partial Review of the Fylde Local Plan to 2032; and/or
- Adoption of the Partial Review of the Fylde Local Plan to 2032.

Submitting your representation

Completed representations can be submitted by email to:

planningpolicy@fylde.gov.uk

or posted to:

Partial Review of the FLP32 Consultation
Planning Policy
Fylde Council
Town Hall,
Lytham St Annes,
Lancashire
FY8 1LW

All comments will be published, but apart from the name of the sender no other personal information will be publicly available. Anonymous comments will not be accepted. All comments received will be submitted to the Secretary of State for Housing, Communities and Local Government and considered as part of a public examination by an independent Planning Inspector.

If representations received from individuals who are not already on the Council's Planning Policy consultation database they will be asked to register: for details of how to register please visit <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/register-of-consultees/> . This is in order that the Council has agreement for the retention of personal data. Personal data in the form of the name and address or name and email address will be retained and where necessary provided to the Programme Officer acting for the Planning Inspector, so that representors can be notified of the subsequent stages of the examination of the Partial Review, and invited to participate further.

Further information

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

Eddie Graves

From: Sally Thompson
Sent: 23 July 2020 13:49
To: Sally Thompson
Subject: FW: PUBLIC CONSULTATION - Partial Review of the Fylde Local Plan to 2032

Dear Sir/Madam,

This is to notify you that the Partial Review of the Fylde Local Plan to 2032 (PRFLP32) has been published for consultation, along with accompanying documents, for six weeks from 23 July 2020 until 5pm on 3 September 2020.

The Partial Review of the Fylde Local Plan to 2032 is not a complete review of the Local Plan. It makes proposed revisions to the Local Plan to deal with two issues:

- The need to ensure that the Local Plan remains in accordance with national planning policy, following the publication of the new National Planning Policy Framework in February 2019;
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The Partial Review of the Fylde Local Plan to 2032 is published in the form of the Schedule of Revisions to the FLP32.

Representations are invited on the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32. This schedule sets out the revisions to the Local Plan which the Council wishes to adopt. Previously, the Council consulted on the scope of the Fylde Local Plan to 2032 Partial Revision, and representations received on that consultation have been taken into account in producing this schedule. Following this publication consultation, the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 will be submitted, together with the representations received in this publication consultation, to the Secretary of State for Examination.

All consultation documents are available to view [here](#). All representations should be made in accordance with the **Statement of Representations Procedure**.

You are receiving this email because your details are stored on the Councils Register of consultees database should these details be incorrect or you wish to be removed from the database please email planningpolicy@fylde.gov.uk

Kind Regards
Planning Policy Team



Sally Thompson

Research and Information Officer- Planning Policy

t: 01253 658686

e: sally.thompson@fylde.gov.uk

Fylde Borough Council

www.fylde.gov.uk

Email Disclaimer



Appendix 2 Pre-consultation response from Wyre Council

By Email Only:

Julie.glaister@fylde.gov.uk; and
Eddie.graves@fylde.gov.uk

Ask for: Steve Smith
Email: Steve.smith@wyre.gov.uk
Tel No: 01253 887243
Our Ref: DtC

Date: 6 March 2020

Dear Ms Glaister,

Duty to Cooperate and the Partial Review of the Fylde Local Plan to 2032

Thank you for providing Wyre Council, alongside other statutory consultees, with a pre-consultation version of a number of documents relating to the partial review of the Fylde Local Plan to 2032. I have been able to respond on a number of matters through a recent Duty to Cooperate (DtC) meeting, in addition to email exchanges and phone conversations between members of your team and my own. This cooperation has been positive, ongoing and constructive and has resulted in some changes to the documents concerned; particularly the Statement of Common Ground (SoCG).

Despite best endeavours there still remain matters where agreement has not been reached by Friday 28 February 2020. I have sought to respond as quickly as possible given your intention to present your proposed partial review to your Planning Committee on 11 March 2020 for a decision on further progress. It may be of benefit if the contents of this letter are put before your Planning Committee on 11 March 2020.

The Wyre Local Plan 2011 – 2031 (WLP31) contains Policy LPR1, the contents of which are incontestable common ground and the confirmation of un-met housing need within Wyre, again incontestable common ground. This un-met need provides (in part) the justification for the review of the Fylde Local Plan to 2032 and a strong link between our two plans and their subsequent review.

Policy LRP1 sets out the steps that need to be undertaken as part of Wyre's Local Plan review in order to ascertain what proportion (if any) of the unmet need can be accommodated in Wyre. As set out above, Fylde's Local Plan review is justified in part by a commitment by Fylde to assisting Wyre meet residual unmet need.

It is therefore my view that the matters to be addressed by Policy LPR1 would most comprehensively be dealt with jointly between our respective authorities. That is, it is my view that our authorities should to work together to identify where the unmet need should be accommodated, and our plan processes need to be properly aligned to accommodate this.

As you will be aware, policy LPR 1 indicates that Wyre's Local Plan Review will include an update of Objectively Assessed Housing Needs.

Since the adoption of Wyre's Local Plan, NPPF 2019 has introduced the Standard Methodology for the purpose of determining the minimum number of homes required in the

area for the purpose of strategic policy making. The adopted policy figure in Wyre's plan is higher than the standard methodology figure. Wyre is required, pursuant to policy LRP1, to update its housing needs assessment for the purpose of the review, and it is this process that will determine Wyre's housing need through the Local Plan Review.

Because the evidence base relating to the Objectively Assessed Need (OAN) that informed both our plans was/is shared and was jointly commissioned; namely the Strategic Housing Market Assessment (SHMA), and because Fylde is considering its own housing needs through its own review, I consider that housing need is an issue that should be jointly considered by our authorities.

Policy LPR1 also requires a review of transport and highway issues, taking into account the matters specified in the policy. Similarly any review of the transport and highways infrastructure matters affecting Wyre could be dealt with jointly given the cross-boundary nature of the road network (both local and strategic), and also given that the outcome of the assessment will assist in informing the authorities of the degree to which Fylde may need to assist Wyre in meeting any unmet needs that cannot be accommodated in Wyre.

I would therefore like to propose that we agree to jointly review the above matters to further inform the partial review of both our plans, providing the opportunity to achieve a consistency of approach between our two authorities and their plans. In my view this is the best way to review our respective plans for our shared housing market area, and to ensure that housing needs are properly planned for and met across the HMA.

I also consider that an alignment of plan making timescales with the potential to more effectively deal with the matter of un-met housing need should be considered.

In the coming weeks I will be seeking quotations from Turley and Lichfields who both provided evidence for the WLP31, and in the case of Turley the SHMA that we both share. I would very much like to include cross boundary assessments of need as part of this/these commission(s) and I await your response to my proposal so that this evidence gathering can begin expediently. I will also be happy to discuss a common plan making timetable with you.

For the avoidance of doubt the full OAN for housing in Wyre is 479 dpa, with the WLP31 providing only 460 dpa; thus establishing the un-met housing need as a matter of recently adopted policy. The housing requirement for Wyre can only be changed through the adoption of a reviewed local plan or through an entirely new local plan. Although the Government has introduced a Standard Method (SM) for the calculation of housing need, this is a starting point and it cannot be assumed that this will represent the final position for Wyre. Therefore we do not consider that reference to potential OANs or housing need figures for Wyre in any of the documents produced as part of your partial review can be accorded any weight at this stage. As set out above, we would however welcome the opportunity to work with you to undertake joint needs assessments for the purpose of our respective Local Plan reviews.

One final matter that I wish to draw your attention to is the fact that it cannot be assumed that Wyre Council, through the partial review process, will be able to meet housing needs in full within the Borough. The Inspector's Report into Wyre's Local Plan made it clear that further consideration needed to be given as to the extent to which any unmet need could be met in Wyre through a review of transport and highway issues. This is reflected in LRP1 (2). Until detailed consideration has been given to this issue through the review process, it has not been established that Wyre can meet any unmet needs within the Borough. Again, we would welcome the opportunity to work with you to undertake a joint review of transport and highway issues to ensure that housing needs are accounted for and met across the HMA.

Finally, I note that Wyre Council are currently consulting on the scope of a partial review. We will continue to seek to discuss any matters arising from that consultation with you in a positive and constructive way.

As always should you wish to discuss the content of this letter further, please do not hesitate to contact myself or indeed any other member of my team. I look forward to continuing the meaningful and ongoing engagement we have.

Regards

A handwritten signature in black ink, consisting of a stylized 'S' followed by a horizontal line.

Steve Smith
Planning Policy and Economic Development Manager

Appendix 3 Fylde Council response to Wyre Council pre-consultation response



Mr Steve Smith
Wyre Council
Civic Centre, Breck Road
Poulton-le-Fylde
Lancashire
FY6 7PU

Our Ref:

Your Ref:

Please Ask For: Julie Glaister

Telephone: 01253 658687

Email: Julie.glaister@fylde.gov.uk

Date: 24th March 2020

Dear Steve

Duty to Cooperate and the Partial Review of the Fylde Local Plan to 2032

Thank you for your letter of 6th March 2020 which provides follow up to the earlier email exchanges, telephone conversations and proceedings at the Duty to Co-Operate meeting of 10th February 2020, in relation to our Partial Review and in particular to our Draft Statement of Common Ground.

Fylde Council is grateful for the expression of support, within the opening paragraph of your letter, for the co-operation that has been undertaken between the Councils in support of the Partial Review of the Fylde Local Plan to 2032. We would in turn like to express thanks for the efforts made by Wyre Council, in particular the time spent by you and your staff, in responding to our Draft Statement of Common Ground through a number of iterations and helping reach a common understanding of our respective positions. Fylde Council would wish to express a commitment to a similar level of effort in engagement with Wyre Council to assist you in the preparation of any Partial Review documents as you require and we will, of course, continue to engage with Wyre Council concerning issues remaining or arising within our Partial Review documents, including those raised elsewhere in your letter.

Fylde Council welcomes the letter in providing clarification as to the “direction of travel” of Wyre Council in relation to the strategic matter of housing need, and expresses thanks for the invitation being made at an early stage of Wyre Council’s plan-making process to work jointly, with an amended timetable for Fylde. Whilst Fylde Council does not wish to commit at this stage to the joint commissioning of supporting documents in relation to housing need and highways and transport capacity, we would wish to keep this matter under review, recognising that the Partial Review of the Wyre Local Plan (2011-2031) remains at its earliest stages.

Fylde Council will commit to engagement with consultants undertaking work that is commissioned by Wyre Council as necessary in support of such work. We will engage supportively with Wyre Council in the bringing forward of its Partial Review through ongoing consideration of strategic cross-boundary matters, under the auspices of the Duty to Co-Operate Memorandum of Understanding between the Fylde Coast Authorities and Lancashire County Council.

We look forward to continued positive engagement in respect of our respective plans. Please feel free to contact me at any time for any further clarification or assistance.

In line with current MHCLG advice, we propose to continue with the review process as best we can, but obviously, given current uncertainties, our original timetable will need to be reviewed.

Yours sincerely,

A handwritten signature in black ink that reads "Julie Glaister". The script is cursive and fluid, with the first letter of each word being capitalized and prominent.

Julie Glaister
Planning Policy Manager



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Date: October 2020

Review Date: N/A

Our Ref: PRFLP32/SR20 (22(1)(c)(v)) Authorised by: Julie Glaister, Planning Policy Manager