



# Agenda

## Planning Committee

Date:	Wednesday, 14 October 2020 at 10:00 am
Venue:	Town Hall, St Annes, FY8 1LW
Committee members:	<p>Councillor Trevor Fiddler (Chairman)</p> <p>Councillor Richard Redcliffe (Vice-Chairman)</p> <p>Councillors Tim Armit, Chris Dixon, Kiran Mulholland, Jayne Nixon, Linda Nulty, Liz Oades, David O'Rourke, Heather Speak, Ray Thomas, Stan Trudgill.</p>

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 Meeting ID: 828 9787 2822  
 Passcode: 450368

	PROCEDURAL ITEMS:	PAGE
1	<b>Declarations of Interest:</b> Declarations of interest, and the responsibility for declaring the same, are matters for elected members. Members are able to obtain advice, in writing, in advance of meetings. This should only be sought via the Council's Monitoring Officer. However, it should be noted that no advice on interests sought less than one working day prior to any meeting will be provided.	1
2	<b>Substitute Members:</b> Details of any substitute members notified in accordance with council procedure rule 24.	1
	<b>DECISION ITEMS:</b>	
3	<b>Local Development Scheme 2020</b>	3 - 22
4	<b>Partial Review of the FLP32: Submission to the Secretary of State</b>	23 - 200
5	<b>White Paper – Planning for the Future 2020</b>	201 - 216

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## DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
DEVELOPMENT SERVICES DIRECTORATE	PLANNING COMMITTEE	14 OCTOBER 2020	3
<b>LOCAL DEVELOPMENT SCHEME 2020</b>			

### PUBLIC ITEM

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

### SUMMARY

A Local Development Scheme (LDS) is a document that Local Planning Authorities are required to produce under the Planning and Compulsory Purchase Act 2004 (As amended by the Localism Act 2011), to set out the Local Development Documents that the Council intends to produce and a timetable for their production. It must be available publicly and kept up to date. The last LDS was published in November 2019 and is now out of date.

The main change to the previous LDS is the addition of a revised timescale for the Partial Review of the Local Plan. The 2019 LDS set out an initial timescale for the Partial Review. However, progress was delayed as a result of the ongoing COVID19 pandemic. The LDS describes the Partial Review process and sets out an updated timescale for its completion.

Additionally, Supplementary Planning Documents (SPDs) will continue to be produced. The LDS describes the SPDs that will be produced and sets out a timetable for the consultations on them, and their adoption. Once the content of the LDS 2020 has been agreed by the Council it will be published on the Council's website. The LDS 2020 is included as Appendix 1 to this Report.

### RECOMMENDATION

1. It is recommended that members agree the content of the LDS 2020 for the purpose of publication on the Council's website.

### SUMMARY OF PREVIOUS DECISIONS

In 2019, the LDS 2019 was agreed for publication on the Council's website.

In 2018, the LDS 2018 was agreed for publication on the Council's website.

In 2015, the LDS 2015 was agreed for publication on the Council's website.

### CORPORATE PRIORITIES

Spending your money in the most efficient way to achieve excellent services ( <b>Value for Money</b> )	✓
Delivering the services that customers expect of an excellent council ( <b>Clean and Green</b> )	✓
Working with all partners ( <b>Vibrant Economy</b> )	✓
To make sure Fylde continues to be one of the most desirable places to live ( <b>A Great Place to Live</b> )	✓
Promoting Fylde as a great destination to visit ( <b>A Great Place to Visit</b> )	✓

## REPORT

### Local Development Scheme 2020

1. A Local Development Scheme (LDS) is a document that Local Planning Authorities are required to produce under the Planning and Compulsory Purchase Act 2004 (As amended by the Localism Act 2011). An LDS sets out the timetable for the production of Development Plan documents. It must be available publicly and kept up to date.
2. The existing Local Development Scheme 2019 has become out of date. Following the publication of the National Planning Policy Framework 2019 revision and the subsequent requirement for a Partial Review, it is important that an LDS is produced which sets out the process of the Partial Review and a timetable for its completion. Whilst this was covered in the 2019 LDS, from March, the country encountered an unprecedented situation of lockdown as a result of the COVID19 pandemic. This significantly delayed the progress of the Partial Review and resulted in the timetable presented in the 2019 LDS becoming out of date.
3. The 2020 LDS sets out the amended timetable for the Partial Review of the Fylde Local Plan to 2032. Additionally, the COVID19 pandemic has been included as a risk that may impact on the proposed timescale. The Supplementary Planning Documents (SPDs) that the Council will produce to assist with the implementation of the Local Plan have also been set out, with amended timescales for the Affordable Housing and the Good Design SPDs.
4. Once the LDS 2020 has been agreed by the committee it will be published on the Council's website in accordance with the Planning and Compulsory Purchase Act 2004 (As amended by the Localism Act 2011).

IMPLICATIONS	
Finance	The costs of the Partial Review will be met from existing budgets.
Legal	The LDS needs to be kept up to date in accordance with the Planning and Compulsory Purchase Act 2004 (As amended by the Localism Act 2011).
Community Safety	None
Human Rights and Equalities	None
Sustainability and Environmental Impact	The Partial Review and Draft SPDs will be subject to Sustainability Appraisal before they are issued for consultation.
Health & Safety and Risk Management	None

LEAD AUTHOR	CONTACT DETAILS	DATE
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BACKGROUND PAPERS		
Name of document	Date	Where available for inspection
Local Development Scheme 2019	2019	<a href="https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/local-development-scheme/">https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/local-development-scheme/</a>

Attached documents:

Appendix 1: Fylde Council Local Development Scheme 2020



# Fylde Council Local Development Scheme

September 2020

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## Disclaimer

The factual information contained in this Local Development Scheme is believed to be correct at the time of survey or publication and care has been taken to ensure accuracy. However, neither Fylde Borough Council nor any of its officers give any guarantee, warranty or representation in respect of any information contained within.



# Contents

<b>1. What is a Local Development Scheme (LDS)</b>	<b>4</b>
What is an LDS?	4
Why is the Council producing a new LDS?	4
<b>2. The Fylde Local Plan to 2032 (The Local Plan)</b>	<b>5</b>
Current Local Plan	5
Fylde Local Plan to 2032	5
Fylde Local Plan to 2032 Partial Review	6
Development Plan Documents	7
Non Development Plan Documents	7
<b>3. Local Development Scheme 2020</b>	<b>8</b>
Fylde Local Plan to 2032 Partial Review	8
Supplementary Planning Documents	8
Resources	9
Risks to timetable	10
Evidence Base	11
Annual Monitoring Report (AMR)	11
Statement of Community Involvement (SCI)	12
Neighbourhood Planning	12
Community Infrastructure Levy (CIL)	12
<b>4. Fylde LDS Gantt Charts</b>	<b>13-15</b>
Partial Review of The Fylde Local Plan to 2032	13-14
Supplementary Planning Documents (SPDs)	15-16

# 1. WHAT IS A LOCAL DEVELOPMENT SCHEME (LDS)?

## What is an LDS?

1.1 All local planning authorities are required to produce a Local Development Scheme (LDS), which details the documents that will comprise the Development Plan for the area.

1.2 An LDS should contain a timetable showing when each document is estimated to be completed and whether the council is on target to achieve the estimated deadline.

## Why is Fylde Council producing a new LDS?

1.3 A Local Development Scheme is a document that local planning authorities are required to produce under the Planning and Compulsory Purchase Act 2004 (As Amended by the Localism Act 2011). It must be available publicly and kept up to date. Planning Practice Guidance (Paragraph 003 Reference ID: 61-003-20190315) states *“Local planning authorities should publish their Local Development Scheme on their website”*.

1.4 The Local Development Scheme provides information on the documents that the Council intend to produce to form their planning policy framework and sets out a timetable for production. This document supersedes the LDS 2019. The LDS 2020 describes the Partial Review of the Fylde Local Plan to 2032 and the Supplementary Planning Documents that the Council are producing.



## 2. THE FYLDE LOCAL PLAN TO 2032

### Current Local Plan

2.1 The Fylde Local Plan to 2032 was adopted on the 22<sup>nd</sup> October 2018 and replaced the Fylde Borough Local Plan (As Altered) (Oct 2005)

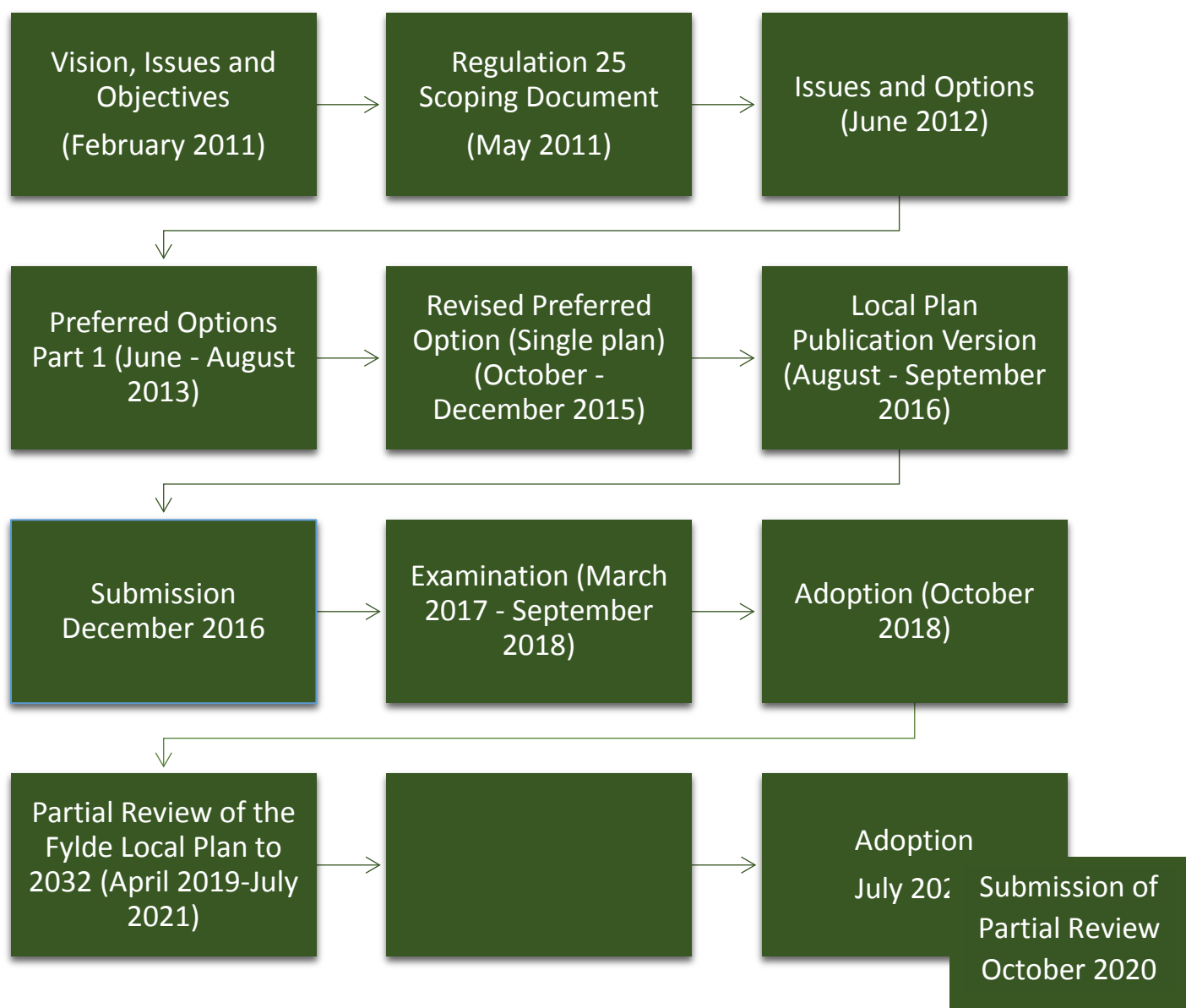
2.2 The Fylde Local Plan to 2032 contains a range of policies and allocations to guide development in the Borough up to the year 2032.

### Fylde Local Plan to 2032 (The Local Plan)

2.3 The Local Plan contains a spatial portrait of how the Borough looks and functions now, together with the Vision for Fylde and a Development Strategy that sets out how the Council envisages the area will develop over the course of the Plan period. It seeks to ensure that new homes, jobs and services required by communities are located in the most sustainable locations and that the framework for delivering the necessary infrastructure, facilities and other development will be provided to make this achievable.

2.4 The Local Plan is accompanied by an Adopted Policies Map and Inset Maps.

Figure 1: The Timetable of the Production of the Fylde Local Plan to 2032.



2.5 To view the adopted Fylde Local Plan to 2032 please see the webpage below:

<https://new.fylde.gov.uk/adopted-local-plan-to-2032/>

### Fylde Local Plan to 2032 Partial Review

2.6 A Partial Review of the Fylde Local Plan to 2032 will bring the Local Plan in line with Paragraph 212 of the National Planning Policy Framework 2019. It will also consider the unmet housing need in Wyre in accordance with Paragraph 1.27 of the Fylde Local Plan to 2032. This will be discussed in more detail in Chapter 3.

## Development Plan Documents

2.7 The Local Plan together with the Joint Lancashire Minerals and Waste Core Strategy DPD 2009 and the Joint Lancashire Minerals and Waste Local Plan Site Allocations and Development Management Policies DPD form the statutory Development Plan for Fylde.

## Non Development Plan Documents

2.8 In addition to the Adopted Local Plan and other Development Plan Documents, Fylde Council also operates:

### **Adopted documents for decision making**

- Fylde Biodiversity Supplementary Planning Document SPD (September 2019)
- Fylde Healthy Living SPD (September 2019)
- Canopies and Glazed Extensions on Commercial Forecourts: A Design Note – (August 2018)
- St. Anne's on the Sea Design Guide
- St. Anne's on the Sea Design Guide Companion Part 1
- St. Anne's on the Sea Design Guide Companion Part 2
- St. Anne's on the Sea Design Guide Companion Part 3

### **Earlier Adopted Supplementary Planning Guidance (SPGs)**

- Extending Your Home (November 2007)
- The Conversion of Fylde's Traditional Farm Buildings (September 2004)
- St. Anne's Renaissance Design Guide (September 2004)
- Policy for Shop Front Design Guide (September 2004)
- Windows, Doors and Architectural Joinery (February 2003)
- Policy for New Flat Development (June 1989)

The above documents can be found through the link: <https://new.fylde.gov.uk/supplementary-planning-guidance/>

## 3. LOCAL DEVELOPMENT SCHEME 2020:

### LDS 2020

3.1 The Fylde Local Plan to 2032 was adopted in October 2018. An update to the NPPF was published in 2019. This has resulted in a Partial Review to the Local Plan to ensure conformity.

3.2 Additionally, to support the Local Plan the Council is proposing to produce two Supplementary Planning Documents (SPDs) on Affordable Housing and Good Design. Further detail of the timetables for these SPDs is provided on page 15. These will be followed by further Supplementary Planning Documents.

3.3 The current timetable for the Partial Review of the Fylde Local Plan to 2032 is presented in Chapter 4.

### Fylde Local Plan to 2032 Partial Review

3.4 The Fylde Local Plan to 2032, adopted on the 22nd October 2018, was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). An update to the NPPF was published in February 2019. Annex 1: Implementation – Paragraph 212 states that *“Plans may need to be revised to reflect policy changes which the updated framework has made. This should be made either through a partial revision or by preparing a new plan”*. In addition, the Local Plan includes a commitment to an early review (full or partial) if the Wyre Local Plan is adopted with unmet need. Wyre’s adopted Local Plan has an unmet need of 365 homes over the plan period to 2031.

3.5 The Council consulted on the scope of the Partial Review of the Fylde Local Plan to 2032 for six weeks from 25 April to 6 June 2019 under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The Partial Review Publication Document was drafted, having regard to the comments received from the scoping consultation. The Council consulted on the Publication version of the Partial Review of the Fylde Local Plan to 2032 for six weeks from the 23<sup>rd</sup> July 2020 to 3<sup>rd</sup> September 2020. It is now intended that the Council will proceed with the production of the final document, ahead of its submission.

3.6 Whilst the Partial Review process began early in 2020, significant delays have occurred as a result of the Covid19 pandemic and the effects of the lockdown period on the consultation process. The LDS has been updated in order to reflect this.

### Supplementary Planning Documents

3.7 Supplementary Planning Documents add further detail to the policies in the Development Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are

capable of being a material consideration in planning decisions but are not part of the Development Plan.

The 2018 LDS set out the timeline of production of four SPDs:

- Fylde Biodiversity SPD
- Fylde Healthy Living SPD
- Fylde Affordable Housing SPD
- Fylde Good Design SPD

3.8 Following the adoption of the Fylde Biodiversity SPD and the Fylde Healthy Living SPD in September 2019, the Council will continue work on the following SPDs:

- Affordable Housing
- Good Design

3.9 Once the final versions have been consulted on planning officers will commence work on other SPDs from the list below which is not in order of priority.

- Tree Strategy
- Open Space
- Viability
- Advertisements
- Car Parking Standards
- Renewable Energy
- SUDs and Critical Drainage Areas

## Resources

3.10 The following in-house resources will be made available for the Partial Review of the Local Plan and producing the SPDs:

- Planning Policy Manager (part time)
- 1 x Principal Planning Officer
- 1 x Planning Officer
- Research and Information Officer (part time)
- Cartographer/GIS Officer (part time)
- Affordable Housing Officer (part time)

3.11 The Local Plan plays a crucial role in helping to implement the Council's vision, strategic objectives and development strategy, which set out how the Council would like Fylde Borough to look in 2032. The Partial Review of the Local Plan will ensure its conformity with the NPPF19. It will also help the Council determine how best to assist Wyre Council in meeting their housing need. Supplementary Planning Documents will add further detail to policies in the Local Plan. As such, wider resources within the Council will be drawn upon including the skills and expertise of colleagues in respect of:

- Biodiversity
- Built Heritage/Conservation
- Development Management
- Design
- Economic Regeneration
- Environmental Health
- Housing
- Parks and Horticulture Services
- Tourism

3.12 Joint working with Lancashire, Wyre, Preston and Blackpool Councils is coordinated through Officer Working Groups, as part of the Duty to Co-operate. There is also a Joint Advisory Committee (JAC) made up of elected Members from each Council, and Lancashire County Council.

3.13 Lancashire County Council has a critical role to play in planning and implementing infrastructure to support Local Plan proposals, particularly in relation to transport and education. Consultants have been, and may be engaged on specific projects where there is a lack of expertise or capacity in-house, for example the production of evidence based studies and documents, needed to support the Partial Review.

### Risks to timetable

3.14 There will always be a degree of uncertainty associated with undertaking a Partial Review of a Local Plan and in presenting specific timescales for SPDs. The following issues contained in the table below present risks to project management.

Possible risk	Potential Impact?
<b>New National Policies and Guidance Published</b>	The Government are continually changing, modifying and publishing planning policy and guidance and as a result additional work to comply with new requirements could result in further/new evidence having to be commissioned and the Partial Review and SPDs having to be re-drafted and re-consulted on.
<b>Brexit</b>	There is uncertainty concerning what will happen after Brexit. For example, Sustainability Appraisal is required under the Strategic Environmental Assessment Regulations which is European Legislation.
<b>Change in Local Government</b>	A new Local Government could decide to take a different course with regard to the Local Plan Partial Review process. This could result in a different process having to be followed.
<b>High demand for the Planning Inspectorate's services</b>	A high demand for the Planning Inspectorates services could lead to delays.

<b>Planning Inspector requests additional work and consultations</b>	This did happen, the Inspector asked the Council to take account of the 2014 Household Projections and to consult on the new evidence, and this delayed adoption of the FLP32. This could happen to the Partial Review.
<b>Unforeseen pressures on staff time &amp; staff turnover</b>	Staff diverted to other work and reduced staff numbers may cause delays in the Local Plan Partial Review process and SPD preparation.
<b>External Bodies could delay the Local Plan</b>	Other bodies, including statutory consultees, could delay the Local Plan Partial Review/SPDs by not making responses on time or by requesting significant changes late on in the plan preparation process.
<b>Legal Challenge</b>	There is a possibility that the documents are quashed completely or there is a requirement to repeat the work.
<b>Covid19 Pandemic</b>	The Covid19 pandemic has already resulted in significant delays to the Partial Review process as a result of the lockdown period which delayed publication. Although the Council have taken measures to avoid further delays, there is a possibility that additional Covid prevention methods could cause further disruption to the Partial Review process.

## Evidence Base

3.15 Local planning authorities should prepare and maintain an up-to-date evidence base on key aspects of the social, economic and environmental characteristics of their area, to enable the preparation of a sound spatial plan meeting the objectives of sustainable development.

3.16 The evidence base needs to be a true and accurate reflection of the Borough. A sound evidence base is crucial to support the Partial Review of the Local Plan and the production of Supplementary Planning Documents.

3.17 A comprehensive list of the evidence used to inform the preparation of the Local Plan is available on the Council's website: <https://online.fylde.gov.uk/council/planning-policy--local-plan-/local-development-framework/comprehensivelistofevidence/>. This evidence is considered to be up to date.

3.18 Information on housing and employment land supply is updated annually. This, with a large quantity of additional information, is used to inform the Council's Authority Monitoring Report (AMR).

## Authority Monitoring Report (AMR)

3.19 In addition to the Partial Review of the Local Plan, an Authority Monitoring Report will be produced annually with a base date of the 31 March. This will monitor the Local Plan and also contain contextual information on the Borough. Each Authority Monitoring Report will



be produced in the autumn following the 31 March and will be made available on the following webpage: <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/authority-monitoring-reports-amr/>

### Statement of Community Involvement (SCI)

3.20 Fylde Council's planning policy team has produced a Statement of Community Involvement (SCI) 2020. It sets out how the Council will engage with stakeholders in preparing Development Plan Documents and planning applications. The current SCI has been published on the following webpage: <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/statement-of-community-involvement/>.

### Neighbourhood Planning

3.21 In addition to producing planning policy documents Fylde Council will provide support to the relevant bodies undertaking Neighbourhood Planning. One Neighbourhood Plan is currently being prepared in Fylde – by Ribby-with-Wrea Parish Council for the Ribby-with-Wrea area. Once adopted a Neighbourhood Development Plan will sit alongside the Local Plan and form part of the Development Plan for the area. Precise details of the support that Fylde Council will provide in the Neighbourhood Planning process is set out in the Neighbourhood Planning protocol available at the following webpage along with the latest updates: <https://new.fylde.gov.uk/resident/planning/planning-policy-local-plan/neighbourhood-planning/>

### Community Infrastructure Levy (CIL)

3.22 Fylde Council has commenced work on the introduction of a CIL but this was placed on hold pending the adoption of the Local Plan and the publication of the updated Regulations. Now the revised Regulations have been published, work on a CIL for Fylde can recommence. However, this will have to await the Partial Review of the Local Plan as a CIL will need to have regard to any revisions to, and a revised viability assessment of the Local Plan.

## 4. FYLDE LDS SUMMARY GRAPH

KEY:

UNLIKELY TO MEET TARGET
UNCERTAIN TIMESCALE
COMPLETED OR ON TARGET

Local Plan to 2032 Partial Review	2019												2020											
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Partial Review Scoping Consultation (6 weeks from 25 <sup>th</sup> April – 6 <sup>th</sup> June)																								
Consideration of responses and present to Committee																								
Schedule of Proposed Revisions presented to Committee																								
Technical Assessments (SEA etc.)																								

Local Plan to 2032 Partial Review	2020												2021											
	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Publication Version presented to Committee																								
Publication Version consultation period																								
Submission																								
Examination																								
Adoption																								

**KEY:**

UNLIKELY TO MEET TARGET
UNCERTAIN TIMESCALE
COMPLETED OR ON TARGET

Supplementary Planning Documents (SPDs) <sup>1</sup>	2018		2019												2020					
	Nov	Dec	Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	April	May	June
SPD Scoping Consultation (6 weeks – 22 <sup>nd</sup> Nov 18 – 3 <sup>rd</sup> Jan 19)	B, HL, AH, GD	B, HL, AH, GD	B, HL, AH, GD																	
Draft SPD preparation and Responses Report			B, HL, AH	B, HL, AH																
Draft SPDs at Planning Committee				B, HL							AH									
Further work and Sustainability Appraisal of Documents					B, HL	B, HL	B, HL	B, HL			AH	AH								
Draft SPD consultation								B, HL	B, HL			AH	AH							
Final SPD preparation									B, HL	B, HL										
Adoption											B, HL									

<sup>1</sup> B = Biodiversity SPD, HL = Healthy Living SPD, AH = Affordable Housing SPD, GD = Good Design SPD

Supplementary Planning Documents (SPDs)	2020						2021											
	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar ch	April	May	June	July	Aug	Sept	Oct	Nov	Dec
Draft SPD preparation and Responses Report	GD	GD	GD	GD	GD	GD												
Draft SPD at Planning Committee							GD											

Further work and Sustainability Appraisal of Documents								GD	GD										
Draft SPD consultation										GD	GD								
Final SPD preparation	AH	AH	AH	AH	AH	AH	AH				GD	GD	GD						
Adoption							AH						GD						

Planning Policy Team  
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## DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
DEVELOPMENT SERVICES DIRECTORATE	PLANNING COMMITTEE	14 OCTOBER 2020	4

### PARTIAL REVIEW OF THE FLP32: SUBMISSION TO THE SECRETARY OF STATE

#### PUBLIC ITEM

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

#### SUMMARY

The Council has produced and consulted on a Partial Review of the Fylde Local Plan to 2032 (FLP32). The Partial Review will address the two objectives of revising plans to reflect policy changes that the National Planning Policy Framework 2019 (NPPF19) has made and examining the issue of Wyre's unmet housing need which was a commitment in the FLP32.

Members agreed on 11<sup>th</sup> March 2020 to the Partial Review documents and for their publication for a six-week consultation under Regulations 19 and 20. The consultation took place between 23<sup>rd</sup> July 2020 and 3<sup>rd</sup> September 2020. Representations were received from 27 bodies and individuals, and are provided in the accompanying documents in Appendices 8, 9 and summarised in Appendix 10.

A wide range of points have been made in the representations which are summarised briefly in this report and in more detail in Appendix 10. The Council's proposed responses to the representations are provided in Appendix 10.

Since the Partial Review consultation commenced, the Government has published a White Paper on changes to the planning system, and a separate consultation on amendments to the current system. A number of representations received make reference to the draft changes and have stated that the Council should pause/abandon/alter the Partial Review accordingly. Officers have sought legal counsel on the implications, and in light of the advice, recommend continuing with the submission of the Partial Review as planned, to the Secretary of State for Examination.

The full suite of submission documents is provided for completeness. A supporting five-year housing land supply draft calculation based on the proposed new housing requirement is now included (Appendix 11).

#### RECOMMENDATIONS

1. Members note the representations made to the Partial Review of the FLP32 in the documents accompanying this report;
2. Members approve the Council's response to those representations in the Statement of Regulation 20 Consultation (Regulation 22(1)(c)(v)) Statement) (Appendix 10)
3. Members approve the Partial Review, supporting documents, technical assessments and responses to the Regulation 19/20 consultation for submission to the Secretary of State.

## SUMMARY OF PREVIOUS DECISIONS

On 11<sup>th</sup> March 2020 the Planning Committee agreed to approve the Partial Review, supporting documents and technical assessments for Publication in accordance with Regulation 19/20 of the Town and Country Planning (Local Planning) (England) Regulations 2012; to approve those documents together with the responses to the Regulation 19/20 consultation for submission to the Secretary of State; and that officers be asked to continue to liaise with Wyre Council in order to seek to address the issue of unmet housing need in Wyre.

On 22<sup>nd</sup> January 2020 the Planning Committee agreed the Council's responses to the Regulation 18 consultation, the scope of the partial review and that technical assessments be carried out.

## CORPORATE PRIORITIES

Spending your money in the most efficient way to achieve excellent services ( <b>Value for Money</b> )	✓
Delivering the services that customers expect of an excellent council ( <b>Clean and Green</b> )	✓
Working with all partners ( <b>Vibrant Economy</b> )	✓
To make sure Fylde continues to be one of the most desirable places to live ( <b>A Great Place to Live</b> )	✓
Promoting Fylde as a great destination to visit ( <b>A Great Place to Visit</b> )	✓

## REPORT

### The Partial Review Consultation

1. The Planning Committee has previously approved the production of the Partial Review of the Fylde Local Plan to 2032 (FLP32) and its publication for consultation in advance of submission to the Secretary of State. The purpose of this report is to provide members with the results of the consultation and the Council's proposed responses to these, and to recommend submission to the Secretary of State.
2. Members of the Committee will be familiar with the reasoning for the Council undertaking the Partial Review of the Fylde Local Plan to 2032 (FLP32): to update the Fylde Local Plan to 2032 so that it accords with the National Planning Policy Framework of February 2019 which made changes from the 2012 version, including the introduction of the new standard method for assessing housing needs; and to fulfil the commitment made in paragraph 1.27 of the need to undertake an early review of the Plan (whether partial or full) to examine the issue of unmet housing need in Wyre, following the adoption of the Wyre Local Plan (2011-2031) with unmet need.
3. The principal document of the Partial Review is the Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32 (Appendix 1). This was accompanied in the consultation with a range of supporting documents and technical assessments, which were presented to members previously and which are provided again for completeness. The consultation was sent to 1,125 consultees in total. The consultation was publicised through a formal press notice and press release, and on the Council's website. The consultation took place between 23rd July 2020 and 3rd September 2020. Copies of the material used for the consultation is provided within the Statement of Regulation 20 Consultation (Regulation 22(1)(c)(v)) Statement) (Appendix 10).
4. Representations were received from 27 bodies and individuals. The points made in the representations included the following (this is far from an exhaustive list):
  - 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 we do not appear to have considered;

- The reduction in the housing requirement is contrary to national policy of “significantly boosting the supply of homes”;
  - 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 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 415 figure, therefore additional sites are needed anyway;
  - The Partial Review as a whole lacks justification and therefore should be withdrawn.
5. The full text of the responses is provided in the Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document) (Appendix 8). The responses are separately set out arranged by policy/paragraph in the Text of Representations Made Under Regulation 20 in Policy Order document (Appendix 9). A summary of the responses, again in policy order, is set out in the Statement of Regulation 20 Consultation (Regulation 22(1)(c)(v)) Statement) (Appendix 10).
6. Wyre Council responded to the Draft Statement of Common Ground and stated that as they still at present have unmet need the National Planning Policy Framework indicates that Fylde should meet this through the Partial Review. However, the Wyre Local Plan (2011-2032) includes a mechanism through its Policy LPR1 to address this unmet need. Therefore, it is not accepted that Wyre have unmet need that “cannot be met” in Wyre, as this can only be demonstrated by Wyre’s Partial Review. The Draft Statement of Common Ground presented here therefore indicates areas of disagreement. Wyre Council have responded to the publication consultation, and they note that cooperation has been positive, ongoing and constructive; they reiterate that the housing need for Wyre will only be altered through adoption of a new plan and as such remains 479 dpa at present; it cannot be assumed that Wyre will be able to meet its own needs; and the changes to the planning system through the White Paper will have implications for how both authorities go forward.

### **Effect of Emerging National Planning Policy and Guidance**

7. The Partial Review consultation commenced on 23<sup>rd</sup> July 2020, although members will recall that the consultation was originally scheduled to commence in March 2020. On 6<sup>th</sup> August 2020, the Government published a consultation on amendments to the current planning system, which proposes significant amendments to the calculation of the standard method for calculating minimum local housing need. Also on 6<sup>th</sup> August 2020 the Government published a White Paper on changes to the planning system, involving proposed wholesale changes backed by primary legislation, which is the subject of a separate report to this meeting.
8. A number of representations received make reference to the draft changes, in particular the higher local housing need figure that would be calculated in the current year following the draft revised standard method. Some respondents have stated that the Council should pause/abandon/alter the Partial Review accordingly. Officers have sought legal counsel on the implications. The changes proposed remain draft only (the consultation closed on 1<sup>st</sup> October) and are therefore not current policy. Current policy remains as set out in the existing Planning Practice Guidance, which has been used to determine the Council’s proposed housing requirement figure. The draft changes propose a transitional arrangement for those authorities who have submitted a plan for examination up to 6 months after the publication date of the new guidance if they are

already at Regulation 19 stage (which the Partial Review has now completed). Therefore, a plan so submitted would be considered under current guidance. It is likely, given that the Partial Review would be submitted shortly following agreement of this committee, that the Council's submission would be even ahead of that point. Once adopted, the advice has been that the Partial Review should remain robust, as at appeal, any inspector should recognise the importance within national policy of the plan-led system. Therefore, in light of the current position and the advice received, officers recommend continuing with the submission of the Partial Review as planned, to the Secretary of State for Examination.

#### **Five Year Housing Land Supply: version of the Draft APS based on the new Housing Requirement Range**

9. In support of the submission to the Secretary of State, the Council has produced an edit of its Five-Year Housing Land Supply – Draft Annual Position for base date 1<sup>st</sup> April 2020. The edited version provides a calculation using the 275 dwellings per annum lower-end housing requirement figure. It is provided as Appendix 11. This provides an update and replaces the previous evidence document for 5 year housing land supply.

#### **Next Steps**

10. The Partial Review of the Fylde Local Plan to 2032, supporting documents and technical assessments will be submitted to the Secretary of State. A Planning Inspector will be appointed by the Planning Inspectorate and the Examination in Public is anticipated to take place over the winter of 2020/2021.
11. The Council has also updated its Local Development Scheme. The updated Local Development Scheme is being presented to this Planning Committee for member approval. The submission of the Partial Review of the FLP32 as recommended in this report is in accordance with the updated Local Development Scheme.

IMPLICATIONS	
Finance	The submission and examination in public will also incur costs which at present are unquantified but it is anticipated that these would be met from existing approved budgets. The Partial Review will be carried out by the existing policy team at the Council at no additional cost.
Legal	The Partial Review will follow the process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Sustainability Appraisal will be carried out in accordance with the Environmental Assessment of Plans and Programmes 2004.
Community Safety	There are no implications for Community Safety.
Human Rights and Equalities	There are no implications for Human Rights and Equality. A Health Impact Screening has been subject to consultation alongside the Partial Review of the FLP32
Sustainability and Environmental Impact	A Sustainability Appraisal has been subject to consultation alongside the Partial Review of the FLP32.
Health & Safety and Risk Management	There are no health and safety implications.

LEAD AUTHOR	CONTACT DETAILS	DATE
Eddie Graves	Eddie.graves@fylde.gov.uk	11 <sup>th</sup> March 2020

BACKGROUND PAPERS		
Name of document	Date	Where available for inspection
EDPR01 – Fylde Local Plan to 2032	October 2018	<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/8.-EDPR01-Fylde-Local-Plan-to-2032.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/8.-EDPR01-Fylde-Local-Plan-to-2032.pdf</a>

EDPR02 – Implications of NPPF19 for FLP32	March 2020	<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/9.-EDPR02-Implications-of-NPPF19-on-FLP32.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/9.-EDPR02-Implications-of-NPPF19-on-FLP32.pdf</a>
EDPR03 – References to NPPF12 in FLP32	March 2020	<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/10.-EDPR03-References-to-NPPF12-in-FLP32.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/10.-EDPR03-References-to-NPPF12-in-FLP32.pdf</a>
EDPR04 – Housing Needs and Requirement Background Paper 2020	March 2020	<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/11.-EDPR04-Housing-Needs-and-Requirement-Background-Paper-2020.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/11.-EDPR04-Housing-Needs-and-Requirement-Background-Paper-2020.pdf</a>
EDPR06 – Fylde Council Authority Monitoring Report (2016-2019)		<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/13.-EDPR06-Fylde-Council-Authority-Monitoring-Report-2016-19.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/13.-EDPR06-Fylde-Council-Authority-Monitoring-Report-2016-19.pdf</a>
EDPR07 – Fylde Council Housing Land Availability Schedule 2019		<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/14.-EDPR07-Fylde-Council-Housing-Land-Availability-Schedule-2019.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/14.-EDPR07-Fylde-Council-Housing-Land-Availability-Schedule-2019.pdf</a>
EDPR08 – Fylde Council Business and Industrial Land Schedule 2016-2018		<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/15.-EDPR08-Fylde-Council-Business-and-Industrial-Land-Schedule-2016-2018.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/15.-EDPR08-Fylde-Council-Business-and-Industrial-Land-Schedule-2016-2018.pdf</a>
EDPR09 – Schedule of Evidence		<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/16.-EDPR09-Schedule-of-Evidence.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/16.-EDPR09-Schedule-of-Evidence.pdf</a>
EDPR10 – Updates to Evidence		<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/07/17.-EDPR10-Updates-to-Evidence.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/07/17.-EDPR10-Updates-to-Evidence.pdf</a>
Local Development Scheme	October 2020	See item 3 of this meeting
Statement of Community Involvement	March 2020	<a href="https://new.fylde.gov.uk/wp-content/uploads/2020/06/Statement-of-Community-Involvement-SCI-June-2020-1.pdf">https://new.fylde.gov.uk/wp-content/uploads/2020/06/Statement-of-Community-Involvement-SCI-June-2020-1.pdf</a>

#### Attached documents:

Appendix 1 SDPR01 – The Partial Review of the Fylde Local Plan to 2032: Schedule of Revisions to the FLP32;  
Appendix 5 SDPR05 – The Draft Statement of Common Ground;  
Appendix 10 SDPR10 - Statement of Regulation 20 Consultation (Regulation 22(1)(c)(v)) Statement)

#### Additional documents available on line [here](#)

Appendix 2 SDPR02 – The Sustainability Appraisal and Strategic Environmental Assessment;  
Appendix 3 SDPR03 – The Habitats Regulations Assessment Screening Report;  
Appendix 4 SDPR04 – The Economic Viability Assessment Review 2020;  
Appendix 6 SDPR06 – The Health Impact Assessment Screening;  
Appendix 7 SDPR07 – The Statement of Regulation 18 Consultation;  
Appendix 8 SDPR08 - Copies of Representations Made Under Regulation 20 (Regulation 22(1)(d) Document)  
Appendix 9 SDPR09 - Text of Representations Made Under Regulation 20 in Policy Order  
Appendix 11 EDPR05 – Five Year Housing Land Supply Draft Annual Position Statement (Partial Review)





## Partial Review of the Fylde Local Plan to 2032

### Schedule of Revisions to the FLP32

March 2020

## Schedule of Revisions to the FLP32

The Fylde Local Plan to 2032 (the FLP32) was adopted on 22nd October 2018. It was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). A revised National Planning Policy Framework was published in July 2018 (NPPF18) and a further version with minor additional revisions was published in February 2019 (NPPF19). Paragraph 212 of NPPF19 states that *“Plans may need to be revised to reflect policy changes which the replacement framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan”*. In light of this, Fylde Council is carrying out a Partial Review of the Local Plan.

Additionally, Paragraph 1.27 of the Local Plan states that *“Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively- assessed need for housing. Any need that remains unmet following the adoption of Wyre’s Local Plan will need to be addressed. Fylde Council will undertake an early review of the Plan (whether partial or full) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development”*.

Accordingly, the Partial Review of the Local Plan is defined by the changes between NPPF12 and NPPF19, as well as the Duty to Cooperate.

The proposed revisions within this document are required to ensure the conformity of the Local Plan with the NPPF19, and to ensure that the Council complies with Paragraph 1.27 of the Local Plan. They involve alterations to policies and text that are essential to serve the function of the Partial Review.

This schedule presents the revisions that are being proposed, alongside the relevant policy or text from the Fylde Local Plan to 2032. The justification for each revision is also acknowledged.

Appendix 1 of the Schedule is the list of Proposed Strategic and Non-Strategic Policies. This is provided as a separate schedule. These will be applied as changes to the policy titles and contents page of the Fylde Local Plan to 2032, but are listed separately in order that the main schedule does not become cluttered with these changes.

A version of the Local Plan incorporating all accepted amendments will be produced at the end of the Examination period. It is intended that the revisions introduced by the Partial Review of the Fylde Local Plan to 2032 will supersede relevant text in the Fylde Local Plan to 2032, which is the adopted development plan, once the Partial Review has been completed and adopted by Fylde Council. A list of policies which will be superseded from the Fylde Local Plan to 2032 has been produced in accordance with the Town and Country Planning (England) Regulations 2012 Part 4 Regulation 8(5).

**Fylde Local Plan to 2032 Policies which will be superseded by the Partial Review of the Fylde Local Plan to 2032 in accordance with Regulation 8(5).**

Policy DLF1: Development Locations for Fylde

Policy GD4: Development in the Countryside

Policy GD 7: Achieving Good Design in Development

Policy EC5 Vibrant Town, District and Local Centres

Policy H1: Housing Delivery and the Allocation of Housing Land



Policy H6: Isolated New Homes in the Countryside

Policy ENV1: Landscape

Policy ENV2: Biodiversity

Policy ENV3: Protecting Existing Open Space (Part of the Green Infrastructure network)

The Development Plan also comprises Neighbourhood Development Plans (NDP). There are two Neighbourhood Plans which have been made, Saint Anne's on the Sea Neighbourhood Plan and Bryning with Warton Neighbourhood Plan.

Fylde Council wrote to Saint Anne's Town Council on 30 August 2019 to advise that the Council had conducted a review of the Saint Anne's on the Sea Neighbourhood Plan to ensure its general conformity with the FLP32. The policies in the NDP are in general conformity with the FLP32. Additionally, the Town Council were advised that there are references to the Framework in the NDP which have been superseded by the publication of NPPF19.

Fylde Council also wrote to Bryning with Warton Parish Council on 30 August 2019 to advise that the Council had conducted a review of the Bryning with Warton Neighbourhood Plan to ensure its general conformity with the FLP32. The policies in the NDP are in general conformity with the FLP32. Additionally, the Parish Council were advised that there are references to the Framework in the NDP which have been superseded by the publication of the NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Chapter 1: Introduction</b>		
Paragraph 1.3	<p>The Fylde Local Plan to 2032 supersedes the saved policies of the Fylde Borough Local Plan (As Altered: October 2005). Appendix 1 sets out the policies in the adopted Fylde Borough Local Plan (As Altered: October 2005) and shows:</p> <ul style="list-style-type: none"> <li>• Policies replaced by policies in this new Fylde Local Plan to 2032 including both Strategic and Non-Strategic Allocations and Development Management policies;</li> <li>• Policies which have been superseded by the National Planning Policy Framework (the Framework); and</li> <li>• Policies which are no longer required.</li> </ul> <p><u>Preparation of the Fylde Local Plan to 2032 fulfilled the requirements set out in the Planning and Compulsory Purchase Act, 2004 and the accompanying Town and Country Planning (Local Planning) (England) Regulations, 2012; and followed the guidance set out in the Framework, published in March 2012 and the Planning Practice Guidance (PPG), issued in March 2014 (as updated). The revised National Planning Policy Framework was published in July 2018, and a further version, published in February 2019, incorporated minor further revisions. Henceforth in this document “the Framework” refers to the February 2019 version of the Framework. Paragraph 214 of the revised Framework provides a transitional arrangement for Local Plans submitted for Examination on or before 24<sup>th</sup> January 2019 whereby, for the purposes of Examination, the policies in the 2012 Framework apply. The Fylde Local Plan to 2032 was therefore prepared and Examined with reference to the 2012 Framework, in accordance with the transitional arrangement.</u></p>	Text consolidated from paragraph 1.4 to allow additional paragraph. Minor updates made to the text transferred to include reference to the 2019 Framework

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.4	<p>Preparation of the Fylde Local Plan to 2032 has fulfilled the requirements set out in the Planning and Compulsory Purchase Act, 2004 and the accompanying Town and Country Planning (Local Planning) (England) Regulations, 2012; and has followed the guidance set out in the Framework, published in March 2012 and the Planning Practice Guidance (PPG), issued in March 2014 (as updated). The revised National Planning Policy Framework was published in July 2018. Paragraph 214 of the revised Framework provides a transitional arrangement for Local Plans submitted for Examination on or before 24th January 2019 whereby, for the purposes of Examination, the policies in the 2012 Framework apply. The Fylde Local Plan to 2032 has therefore been prepared and Examined with reference to the 2012 Framework, in accordance with the transitional arrangement. This version of the Local Plan is the Partial Review of the Fylde Local Plan to 2032. The Council has undertaken the Partial Review to address two matters:</p> <ul style="list-style-type: none"> <li>• <u>Paragraph 212 of the Framework states that Plans may need to be revised to reflect policy changes which the replacement framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan. This Partial Review of the Fylde Local Plan to 2032 incorporates revisions to ensure the Local Plan is in accordance with the revised Framework of February 2019.</u></li> </ul>	Introduction paragraph revised to include introduction to the Partial Review and to the 2019 Framework

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.4 (contd.)	<ul style="list-style-type: none"> <li>Paragraph 1.27 of the Local Plan commits the Council to undertake an early review of the Plan (whether partial or full) to examine the issue of unmet need in Wyre, if Wyre's Local Plan is adopted with unmet need. The Wyre Local Plan (2011-2031) was adopted on 28<sup>th</sup> February 2019 with a shortfall of housing provision against the housing need figure identified in the plan. This Partial Review of the Fylde Local Plan to 2032 incorporates revisions to provide explanation of the updated position in order to address the issue, and is accompanied by a supporting statement of common ground.</li> </ul>	

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.5	<p>The new Fylde Local Plan to 2032 is built upon the key principle of <b>sustainable development</b> and its three dimensions: social, economic and environmental. These dimensions give rise to the need for the planning system to perform a number of roles (the Framework):</p> <ul style="list-style-type: none"> <li>• <b>An economic <del>role-objective</del></b> – <del>contributing to building to help build</del> a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, <del>and innovation and improved productivity</del>; and by identifying and coordinating development requirements, including the provision of infrastructure;</li> <li>• <b>A social <del>role-objective</del></b> – <del>supporting to support</del> strong, vibrant and healthy communities, by <del>providing the supply of housing required</del> <u>ensuring that a sufficient number and range of homes can be provided</u> to meet the needs of present and future generations; and by <del>creating a high quality fostering a well-designed and safe</del> built environment, with accessible local services and open spaces that reflect the community's current and future needs and supports communities' <del>its</del> health, social and cultural well-being; and</li> <li>• <b>An environmental <del>role-objective</del></b> – <del>contributing to contribute</del> to protecting and enhancing our natural, built and historic environment; <del>and, as part of this including making effective use of land, helping to improve biodiversity, use using natural resources prudently, minimise minimising waste and pollution, and mitigate mitigating and adapt adapting to climate change,</del> including moving to a low carbon economy.</li> </ul>	To accord with revised wording in NPPF19 paragraph 8.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.9	<p>Neighbourhood Development Plans (NDPs) may also be produced by a parish/town council or a neighbourhood forum. Neighbourhood planning provides a powerful set of tools for local residents to ensure they achieve the right type of development for their community. NDP policies must be in general conformity with the strategic policies of the adopted Local Plan and National Policy. The Framework states <i>'Neighbourhood planning gives communities <del>direct</del> the power to develop a shared vision for their <del>neighbourhood</del> area. Neighbourhood plans can shape, direct and help to deliver the sustainable development, <del>they need</del> by influencing local planning decisions as part of the statutory development plan.'</i> Two NDPs have been prepared in advance of this Local Plan. The St Anne's on the Sea NDP and the Bryning with Warton NDP were both made on 24th May 2017, following public hearings and referenda. Neighbourhood Development Plans for Wrea Green and Staining are in progress. Elswick Parish Council has agreed to prepare a NDP, following the decision of the Development Management Committee on 9 March 2016 to reduce the number of homes from 140 to 50 and to change its status to a <b>Tier 2</b> Smaller Rural Settlement. Improvements may be required to the existing A585 Thistleton junction to improve safety and accessibility.</p>	To accord with revised wording in NPPF19 paragraph 29.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.15	<p>The Framework gives further guidance on <del>'<i>planning strategically across local boundaries</i></del><i>Maintaining effective cooperation</i>' and highlights the importance of joint working to <del>meet</del><i>help</i> to determine where additional infrastructure is necessary, and <del>whether development requirements</del><i>needs</i> that cannot be wholly met within a single local planning <del>particular plan</del> area <del>could be met elsewhere, through either joint planning policies or informal strategies such as infrastructure and investment plans.</del> <b><i>'Public bodies have a Duty to Cooperate on planning issues Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.'</i></b> (the Framework)</p>	To accord with revised wording in NPPF19 paragraphs 24 and 26.
Paragraph 1.16	<p>The Framework states that <del>'<i>Local planning authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination</i></del><i>In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.'</i> The paragraph also provides examples of how evidence of co-operation may be demonstrated, such as jointly prepared strategies or planning policies, joint committees with neighbouring authorities to make decisions or memorandums of understanding to agree how authorities and bodies will co-operate with each other as they prepare planning policy or strategy.</p>	To accord with revised wording in NPPF19 paragraph 27.



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.18	<p>Under the Duty to Cooperate Fylde, Blackpool, Wyre and Lancashire County Councils are collectively working together on the strategic priorities highlighted in the Framework for the Fylde Coast sub-region, which are:</p> <ul style="list-style-type: none"> <li>• <u>the overall strategy for the pattern, scale and quality of development;</u></li> <li>• <u>the homes and jobs needed in the area housing (including affordable housing), employment, retail, leisure and other commercial development;</u></li> <li>• <del>the provision of retail, leisure and other commercial development;</del></li> <li>• <u>the provision of infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</u></li> <li>• <del>coastal change management;</del></li> <li>• <del>the provision of minerals (including mineral safeguarding areas) and energy (including heat);</del></li> <li>• <u>community facilities the provision of (such as health, security, community education and cultural infrastructure and other local facilities); and</u></li> <li>• <del>climate change mitigation and adaptation;</del></li> </ul>	To accord with revised wording in NPPF19 paragraph 20.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<ul style="list-style-type: none"> <li>conservation and enhancement of the natural, <u>built</u> and historic environment, including <u>landscapes and green infrastructure</u>, and <u>planning measures to address climate change mitigation and adaptation</u>.</li> </ul>	
Paragraph 1.24	<p>Wyre Council wrote to Fylde Council in May 2016, under the Duty Cooperate, to request that Fylde Council assist Wyre Council in meeting its objectively assessed housing need. <del>The Objectively Assessed Need (OAN) figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA 2014 and its updates which considered revised population and household formation data. For Wyre Council this gave an OAN of between 400 and 479 dwellings per annum from 2011 to 2031. Wyre Council considers 479 dwellings per annum to be an appropriate housing requirement figure which ties in with the economic evidence and this figure was accepted by Wyre Council on 14th April 2016. In consequence, the Local Plan was adopted with a mechanism to trigger a review (whether full or partial) to examine the issue of unmet need. The explanation was given in the original text of the Local Plan in paragraphs 1.24 to 1.27. The review mechanism is contained in paragraph 1.27. The original policy text is reproduced for information below:</del></p>	To provide an updated position concerning the Wyre Local Plan, in response to the requirement in paragraph 1.27 of the adopted FLP32

<p>After paragraph 1.24</p>	<p><b><u>Text from original Fylde Local Plan to 2032 as Adopted in October 2018:</u></b></p> <p><b><u>1.24</u></b> Wyre Council wrote to Fylde Council in May 2016, under the Duty Cooperate, to request that Fylde Council assist Wyre Council in meeting its objectively assessed housing need. The Objectively Assessed Need (OAN) figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA 2014 and its updates which considered revised population and household formation data. For Wyre Council this gave an OAN of between 400 and 479 dwellings per annum from 2011 to 2031. Wyre Council considers 479 dwellings per annum to be an appropriate housing requirement figure which ties in with the economic evidence and this figure was accepted by Wyre Council on 14th April 2016.</p> <p><b><u>1.25</u></b> Wyre Council has identified that the supply of deliverable land is constrained by three main issues:</p> <ul style="list-style-type: none"> <li>• <u>Highway capacity, in particular on the A585(T), and A6 and also at Junctions 1 and 3 on the M55</u></li> <li>• <u>Flood Risk</u></li> <li>• <u>Green Belt</u></li> </ul> <p><b><u>1.26</u></b> Wyre Council's evidence base in relation to these issues remains incomplete and the exact extent of their unmet need is unknown as the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not yet been assessed. It is also unclear what provision, if any, other neighbouring authorities will be able to make. The difficulty has arisen because of timing: the production of plans has not been aligned.</p>	<p>Previous text to be included within box for clarification. The new text explains what has been done in response to this text.</p>
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Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p><u>1.27 Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.</u></p>	
Paragraph 1.25	<p><u>The Wyre Local Plan (2011-2031) was adopted on 28<sup>th</sup> February 2019. Paragraph 4.1.6 of the Wyre Local Plan identifies the Objectively Assessed Need (OAN) for housing to be 479 dwellings per annum, equating to 9,580 over the plan period to 2031, derived from the Fylde Coast SHMA and its Addenda. The Wyre Local Plan Policy SP1 states that it will deliver a minimum of 9,200 dwellings, which equates to 460 dwellings per annum over the plan period, resulting in a shortfall of 380 dwellings or 4% of the OAN. The adoption of the Wyre Local Plan with this shortfall therefore triggers the early review mechanism contained within paragraph 1.27 of the Fylde Local Plan to 2032 (as adopted). Wyre Council has identified that the supply of deliverable land is constrained by three main issues:</u></p> <ul style="list-style-type: none"> <li>• <del>Highway capacity, in particular on the A585(T), and A6 and also at Junctions 1 and 3 on the M55</del></li> <li>• <del>Flood Risk</del></li> <li>• <del>Green Belt</del></li> </ul>	To provide an updated position concerning the Wyre Local Plan, in response to the requirement in paragraph 1.27 of the adopted FLP32

Paragraph 1.26	<p>The Wyre Local Plan includes a policy LPR1 which commits Wyre Council to a partial review of the Wyre Local Plan <i>“with the objective of meeting the full Objectively Assessed Housing Needs”</i>. The policy specifies that the review is to include :</p> <p><u>1. An update of Objectively Assessed Housing Needs.</u></p> <p><u>2. A review of transport and highway issues taking into account:</u></p> <p><u>(i) housing commitments and updated housing needs;</u></p> <p><u>(ii) implemented and committed highway schemes;</u></p> <p><u>(iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and</u></p> <p><u>(iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.</u></p> <p><u>3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.</u></p> <p><u>Whether the unmet need of 380 dwellings from the Wyre Local Plan (2011-2031) cannot be met in Wyre is a matter for the Partial Review of the Wyre Local Plan’s reassessment of housing need in Wyre and how it is to be met. The Wyre Local Plan Policy LPR1, and the Inspector’s report, makes clear that any unmet needs will be met in Wyre, through the Partial Review of the Wyre Local Plan. The Wyre Local Plan was prepared and adopted under the 2012 version of the Framework: the update of housing needs that Wyre Council will conduct under their policy LPR1 will be in line with the revised policy in the 2019 version of the Framework, and the updated PPG. The local housing need for Wyre calculated using the standard method in PPG gives a figure of 308 dwellings per annum. This is significantly below the 460 dwellings per annum that the Wyre Local Plan provides for. Therefore, the housing needs in Wyre under an assessment using the standard method will be fully met by the Wyre Local Plan. Any housing need that cannot be met in Wyre, established through Wyre’s</u></p>	<p>To provide an updated position concerning the Wyre Local Plan, in response to the requirement in paragraph 1.27 of the adopted FLP32</p>
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Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p><u>Partial Review, up to and including the need unmet following the adoption of the Wyre Local Plan (2011-2031) (30 dwellings per annum), is provided for if needed through the new housing requirement range of 275-415 in the Partial Review of the Fylde Local Plan to 2032.</u> Wyre Council's evidence base in relation to these issues remains incomplete and the exact extent of their unmet need is unknown as the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not yet been assessed. It is also unclear what provision, if any, other neighbouring authorities will be able to make. The difficulty has arisen because of timing: the production of plans has not been aligned.</p>	
Paragraph 1.27	<p><u>The Partial Review of the Fylde Local Plan therefore has not needed to incorporate alterations to its strategic policies or housing needs or requirement figure, other than those changes made for other reasons, following consideration of the issue of housing needs in Wyre. Explanatory paragraphs above are revised to clarify the updated position following the Partial Review.</u> Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.</p>	<p>To provide an updated position concerning the Wyre Local Plan, in response to the requirement in paragraph 1.27 of the adopted FLP32</p>

Paragraph 1.28	<p>Before a Council adopts a Local Plan, it must be submitted to the Secretary of State, and undergo Examination in Public. The Local Plan has been examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with legal requirements including the Duty to Cooperate, and whether it is sound. The tests of soundness are set out in the Framework; the Local Plan must be:</p> <ul style="list-style-type: none"> <li>• <b>Positively prepared</b> – <del>the plan should be prepared based on providing</del> a strategy which, <u>as a minimum</u>, seeks to meet <u>the area's objectively assessed development and infrastructure requirements needs;</u> and <u>is informed by agreements with other authorities, so that including unmet requirements need</u> from neighbouring <del>authorities</del> <u>areas is accommodated</u> where it is <u>reasonable practical</u> to do so and <u>is consistent with achieving sustainable development;</u></li> <li>• <b>Justified</b> – <del>the plan should be the most</del> <u>an</u> appropriate strategy, <del>when considered against</del> <u>taking into account</u> the reasonable alternatives, <u>and</u> based on proportionate evidence;</li> <li>• <b>Effective</b> – <del>the plan should be deliverable over its period, and</del> based on effective joint working on cross-boundary strategic <del>priorities</del> <u>matters that have been dealt with rather than deferred, as evidenced by the statement of common ground;</u> and</li> <li>• <b>Consistent with national policy</b> – <del>the plan should enable</del> <u>enabling</u> the delivery of sustainable development in accordance with the policies in <del>the</del> <u>this</u> Framework.</li> </ul> <p>The outcome of the Examination of the Local Plan is explained later in this chapter.</p>	To accord with revised wording in NPPF19 paragraph 35.
Paragraph 1.40	Following further public consultation in February –March 2018 on Main Modifications made during Examination, the Inspector's Report was published in September 2018. The Inspector found that the Local Plan was legally compliant, and	Consolidation of paragraphs to allow for new content below

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p>was sound, with Main Modifications as put forward by the Council. The Inspector's Report and Schedules of Modifications are published on the Council's website. <u>The final version of the Local Plan for Adoption incorporated all of the Main Modifications required for soundness. It also incorporated Additional Modifications, which are more minor in nature and do not materially affect the policies of the Local Plan: the Additional Modifications were to correct grammar and spelling, improve clarity or to provide updated information within the text. The Local Plan is accompanied by the Policies Map including Inset Plans, which incorporates modifications made during the Examination process.</u></p>	
New side heading	<b><u>Partial Review of the Fylde Local Plan to 2032</u></b>	To introduce new content
Paragraph 1.41	<p><del>This final version of the Local Plan for Adoption incorporates all of the Main Modifications required for soundness. It also incorporates Additional Modifications, which are more minor in nature and do not materially affect the policies of the Local Plan: these Additional Modifications are to correct grammar and spelling, improve clarity or to provide updated information within the text. The Local Plan is accompanied by the Policies Map including Inset Plans, which incorporates modifications made during the Examination process.</del> <u>This version of the Local Plan is the Partial Review of the Fylde Local Plan to 2032. It incorporates revisions to the text of the adopted Local Plan, to address changes to the Framework and the matter of housing need in Wyre, as set out earlier in this chapter. A Regulation 18 Consultation for the Partial Review was undertaken between 25th April 2019 and 6th June 2019, and the Partial Review of the Local Plan to 2032 reflects the outcomes of that consultation.</u></p>	Original text consolidate into paragraph 1.40. New text added to describe the latest stage of plan preparation



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 1.42	It is important to gather up-to-date relevant information to support the Local Plan, which is referred to as the 'evidence base'. The Council has collected information on a range of issues to directly inform the preparation of policy. A comprehensive list of the evidence used to inform preparation of the Local Plan is available on the Council's website. <u>Evidence has been updated as necessary in order to justify changes made through the Partial Review of the Fylde Local Plan to 2032.</u>	To note updates made to evidence as part of the Partial Review
Paragraph 1.44	The results of the previous technical assessments have been used to update and enhance the Local Plan during its preparation. Updates of the technical assessments have been undertaken where necessary following modification of the plan during examination. A further update of the HRA was undertaken to take account of the Court of Justice of the European Union (CJEU) judgement (People over Wind & Sweetman v Coillte Teoranta Case C-323/17), dated 12th April 2018, in Ireland: this update incorporated Appropriate Assessment of the policies and allocations where likely significant effects could not be screened out without mitigation. The HRA Update concluded that the Local Plan would not result in adverse effects on the integrity of the European sites, either alone or in-combination with other plans or projects. This conclusion was supported by Natural England. <u>Further updates to the technical assessments have been undertaken to take account of the revisions made by the Partial Review of the Fylde Local Plan to 2032.</u>	To note the updates made to the technical assessments as part of the Partial Review

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Cross-Cutting Themes: Equality	<p>In terms of equality, the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. <del>The Council should create a shared vision with communities, of the new housing developments and Gypsies and Travellers and Travelling Showpeople pitches and yards and facilities they wish to see. To support this, the Council should aim to involve all sections of the community in the development of the Local Plan (the Framework).</del></p> <p>Measures to promote healthier lifestyles, such as promoting walking and cycling, will lead to reductions in inequalities.</p> <p>Improving transport infrastructure and accessibility to such infrastructure reduces the number of trips and provides alternative forms of transport to the car including walking, cycling and public transport.</p>	Removal of quote from NPPF12, no longer within NPPF19 or PPG.

<p>Cross-Cutting Themes: Viability</p>	<p><del>Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. The plan should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable (the Framework). 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.</del></p> <p><del>Where safeguards are necessary to make a particular development acceptable in planning terms (such as environmental mitigation or compensation), the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements. The need for such safeguards should be clearly justified through discussions with the applicant, and the options for keeping such costs to a minimum fully explored, so that development is not inhibited unnecessarily (the Framework). The role for viability assessment is primarily at the plan making stage. 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.</del></p> <p><del>The Council should set out the policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed local standards when added to nationally required standards. In order to be appropriate, the</del></p>	<p>Removal of out-of-date text from NPPF12, replacement with text from NPPF19 and PPG.</p>
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Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p>cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle (the Framework). Any affordable housing or local standards requirements that may be applied to development should be assessed at the plan-making stage, where possible, and kept under review (the Framework). <u>It is the responsibility of site promoters to engage in plan making, take into account any costs including their own profit expectations and risks, and ensure that proposals for development are policy compliant. The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan. Landowners and site purchasers should consider this when agreeing land transactions.</u></p> <p><del>Where practical, CIL charges should be worked up and tested alongside the Local Plan. The CIL should support and incentivise new development, particularly by placing control over a meaningful proportion of the funds raised within the neighbourhoods where development takes place (the Framework). It is important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that the Council understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan (the Framework)</del></p>	
Chapter 2: A Spatial Portrait of Fylde	No changes to be made to this chapter	

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Chapter 3: A Vision for Fylde		
Paragraph 3.4	<del>The Vision reflects the twelve core land-use planning principles set out in the Framework.</del>	The twelve core principles appeared in NPPF12 but were deleted in NPPF19. Paragraph deleted.
Chapter 4: Strategic Objectives	No changes to be made to this chapter	

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Chapter 5: The Development Strategy		
Policy DLF1	<p>The Local Plan will provide sites for a minimum of <u>6,895</u>-8,715 new homes and a minimum of 60.6 Ha (gross requirement) of additional employment land over the plan period to 31 March 2032.</p> <p>...</p> <p><b>Broad Distribution of Development</b></p> <p><b>Strategic Locations</b></p> <p>Around <del>7,845</del> homes, representing 90% of homes to be developed in the plan period (including small sites) and 59.6 Ha of employment land will be located in the four Strategic Locations for development.</p> <p><b>Non-strategic Locations</b></p> <p>Around <del>870</del> homes, representing 10% of homes to be developed in the plan period (including small sites) and 2.4 Ha of employment land will be located in the Non-strategic Locations.</p> <p>...</p>	<p>Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Policy DLF1 (contd.)	<p><b>Windfalls (including small committed sites)</b></p> <p>Small housing sites (amounting to between 1 and 9 homes) are not allocated; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum in years 10 to 21 of the plan. The delivery of small sites that are already committed is included within the Housing Trajectory (Appendix 2): this provides for the delivery of small sites up to year 10 of the plan. Small committed sites and windfalls yet to come will provide around <del>1040 homes within the plan period</del> (11% of the housing requirement). There may also be some larger windfall sites that will also contribute to this figure.</p>	Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.
Chapter 6: Strategic Locations for Development	<b>No changes to be made to this chapter</b>	
Chapter 7: General Development Policies		
Paragraph 7.12	The Areas of Separation will be a focus for Green Infrastructure. So far as is consistent with the predominantly open and undeveloped character of the area, opportunities to improve public access and appropriate recreational uses will be supported. Similarly, opportunities to conserve, <del>enhance and restore</del> , <u>enhance and create</u> biodiversity and geodiversity value will be encouraged.	To accord with paragraph 174 of NPPF19.

<b>Policy GD4</b>	<p>Development in the Countryside, shown on the <b>Policies Map including Inset Plans</b>, will be limited to:</p> <ul style="list-style-type: none"> <li>a) that needed for purposes of <u>meeting local business and community needs, for the purposes of</u> agriculture, horticulture or forestry; or other uses appropriate to a rural area, including uses which would help to diversify the rural economy, including small-scale tourist accommodation, holiday caravan sites and very exceptionally, larger scale tourism development; <u>The development must be sensitive to its surroundings, must not have an unacceptable impact on local roads and exploit any opportunity to make the location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).</u></li> <li>b) the re-use or rehabilitation of existing permanent and substantial buildings;</li> <li>c) extensions to existing dwellings and other buildings in accordance with Policy <b>H7</b>;</li> <li>d) 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;</li> <li>e) isolated new homes in the countryside which meet the criteria set out in Policy <b>H6</b>;</li> <li>f) minor infill development</li> <li>g) <u>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.</u></li> </ul>	<p>The text in criterion a) requires alteration to reflect text in paragraph 84 of NPPF19.</p> <p>Paragraph 71 of the NPPF19 contains additional text on supporting entry-level homes. Criterion g) should be included as an addition to Policy GD4 to ensure conformity with paragraph 71 of NPPF19.</p>
<b>Paragraph 7.14</b>	The most appropriate development permissible in the countryside will be for the <u>purposes of meeting local business and community needs and</u> for agricultural,	To accord with paragraph 84 of NPPF19 and to reflect the



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	horticultural or forestry purposes, where this is necessary for the efficient and effective running of the enterprise. Some forms of tourism development are appropriate within the rural areas, all of which are covered in Chapter 8.	proposed additional text to criterion a) of Policy GD4.
<b>Paragraph 7.21</b>	The Framework provides clear guidance in support of mixed use development. Locally, the focus of development over the lifetime of the plan is within the four Strategic Locations for Development. It is with the quantum of development in these locations that the critical mass will be achieved to ensure that mixed use developments will be delivered, with homes being built close to where people work and shop and also seeking a range of services. Therefore, it is intended that all development on sites where any of criteria a. to c. in Policy <b>GD6</b> apply should include an element of mixed use. The Framework contains a particular recommendation for live / work. It says that when drawing up local plans, councils should <u>“facilitate allow for new and flexible working practices (such as live-work accommodation)”</u> , <del>such as the integration of residential and commercial uses within the same unit</del> (the Framework).	Paragraph 7.21 quotes from paragraph 21 of NPPF12. The text from NPPF12 has been replaced with the new wording in paragraph 81d) of NPPF19.

<p><b>Criterion l) and criterion p) of Policy GD7</b></p>	<p>...</p> <p><b>Design and Access Statements</b></p> <p>Where required, all development proposals should be accompanied by a Design and Access Statement that fully explains and justifies the design approach for the scheme.</p> <p><b>General Principles of good design</b></p> <p>Development will be expected to be of a high standard of design, taking account of the character and appearance of the local area, including the following requirements:</p> <p>.....</p> <p>l) Creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, and there are clear and legible pedestrian and cycle routes and high quality public space, which encourages the active and continual use of public areas <u>and which promote health and wellbeing.</u> .....</p> <p>p) <u>Ensuring that the quality of approved development is not materially diminished between permission and completion.</u></p> <p>.....</p> <p><i>[A re-numbering of the criteria has occurred subsequent to the addition of criterion p).]</i></p>	<p>The changes to criterion l) of Policy GD7 are necessitated by the additional wording in Paragraph 127 of NPPF19.</p> <p>Paragraph 130 of NPPF19 contains additional text relating to the lowering of standards during the delivering of a development. Criterion p) is needed as an addition to Policy GD7 to ensure conformity with Paragraph 130 of the NPPF19.</p>
<p><b>Chapter 8: The Fylde Economy</b></p>		

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 8.17	<p>The appropriate uses identified in policy <b>EC1</b> are intended to provide for the development needs of business and industry. The Council will resist proposals which seek to reduce the supply of land for business and industrial use. However, the Framework makes it quite clear that planning policies <u>and decisions need to reflect changes in the demand for land.</u> <del>should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose and land allocations should be regularly reviewed.</del></p> <p><b>Performance Monitoring Indicator 5</b>, in <b>Appendix 8</b>, sets out a target / policy outcome recording the cumulative take-up of land for employment development from 1 April 2011 in relation to the plan period requirement of <b>60.6 Ha</b>.</p>	<p>Paragraph 8.17 quotes from NPPF12, the text from NPPF12 has been deleted and been replaced with a more general reference to the Framework.</p>
Paragraph 8.22	<p>The Framework states that local plans should <del>support economic</del><u>enable sustainable</u> growth and expansion <u>of businesses</u> in the rural areas by taking a positive approach to sustainable new development <u>and conversions</u>. It also says that local plans should <del>promote</del> <u>enable</u> the development and diversification of agricultural and other land based rural businesses. Sustainable agricultural diversification will be promoted as an important aspect of maintaining the rural economy. <u>Sustainable R</u>rural businesses, tourism or recreational uses will also be encouraged. <u>Decisions should enable the retention and development of accessible local services and community facilities in line with the Framework.</u></p>	<p>Paragraph 8.22 refers to the framework but includes out of date text from NPPF12. It has been amended to reflect the content of paragraph 83 of NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Policy EC5 Vibrant Town, District and Local Centres</b>	<p><b>Development Outside of Town Centres</b></p> <p>Proposals for retail, <u>and</u> leisure <del>and office</del> development in 'edge of centre' or 'out-of-centre' locations will be considered in line with the Framework, bearing in mind the impacts on existing centres.</p> <p>When assessing proposals for retail, <u>and</u> leisure <del>and office</del> development outside of centres, a local threshold of any development more than 750 square metres, will apply in terms of requiring a retail impact assessment.</p> <p>When undertaking a sequential test, or retail impact assessment, it will be necessary to have regard to likely impact upon other centres, including those outside of Fylde.</p>	Paragraph 89 of the NPPF19 removes the need to assess the impact of out of centre office proposals on town centres. The sequential approach is considered to adequately control inappropriate office proposals.
<b>Paragraph 8.55</b>	<p>The sequential approach to planning applications for main town centre uses, as set out in the Framework, will operate requiring a town centres first approach.</p> <p>Proposals for development in 'edge of centre' or 'out-of-centre' locations will be considered in line with the Framework. Consequently, when assessing proposals for retail, <u>and</u> leisure <del>and office</del> development outside of town centres, a local threshold for development comprising more than 750sq.m. will require an impact assessment.</p>	Paragraph 89 of the NPPF19 removes the need to assess the impact of out of centre office proposals on town centres. The sequential approach is considered to adequately control inappropriate office proposals.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Chapter 9: Provision of Homes in Fylde</b>		
<b>Paragraph 9.10</b>	Addendum 1 does not provide a full objective assessment of need for the Fylde Coast, and should therefore, be read alongside the SHMA. It was concluded that the objectively assessed ranges of need in the SHMA remain valid, and are reflective of a longer term and more positive demographic economic context than that projected under the 2012 SNPP. <u>The Council has accepted the findings of the Addendum 1 and they can be viewed on the Council's website at <a href="http://www.fylde.gov.uk/council/planning-policy--local-plan-/fylde-coast-strategic-housing-market-assessment/">http://www.fylde.gov.uk/council/planning-policy--local-plan-/fylde-coast-strategic-housing-market-assessment/</a></u>	Consolidation of paragraphs to allow new content in paragraphs 9.13 onwards
<b>Paragraph 9.11</b>	<u>The Council has accepted the findings of the Addendum 1 and they can be viewed on the Council's website at <a href="http://www.fylde.gov.uk/council/planning-policy--local-plan-/fylde-coast-strategic-housing-market-assessment/">http://www.fylde.gov.uk/council/planning-policy--local-plan-/fylde-coast-strategic-housing-market-assessment/</a></u> On 27 February 2015 the Sub National Household Projections 2012-2037 (2012 SNHP) were released by the DCLG. An additional piece of work was commissioned by Fylde, to take account of the 2012 SNHP – The Analysis of Housing Need in light of the 2012 SNHP (Addendum 2).	Consolidation of paragraphs to allow new content in paragraphs 9.13 onwards

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 9.12	<p>On 27 February 2015 the Sub National Household Projections 2012-2037 (2012 SNHP) were released by the DCLG. An additional piece of work was commissioned by Fylde, to take account of the 2012 SNHP – The Analysis of Housing Need in light of the 2012 SNHP (Addendum 2). The 2014-based household projections to 2039 for England were published on 12 July 2016, and provide a new ‘starting point’ for the assessment of housing needs in line with the PPG. A further piece of work was commissioned by Fylde to take account of the 2014 SNHP and updated economic forecasts – The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032(May 2017) (Addendum 3). Addendum 3 concluded that the evidence indicated an Objectively Assessed Need (OAN) of between 410-430 dwellings per annum.</p>	Consolidation of paragraphs to allow new content in paragraphs 9.13 onwards

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 9.13	<p>The 2014-based household projections to 2039 for England were published on 12 July 2016, and provide a new ‘starting point’ for the assessment of housing needs in line with the PPG. A further piece of work was commissioned by Fylde to take account of the 2014 SNHP and updated economic forecasts – The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032 (May 2017) (Addendum 3). Addendum 3 concludes that the evidence indicates an Objectively Assessed Need (OAN) of between 410-430 dwellings per annum. <u>A revised Framework was published in July 2018 and was subsequently updated in February 2019. The Framework states that strategic policies should be informed by a local housing need assessment, calculated using the standard method in national planning guidance, unless justified by exceptional circumstances. This national policy therefore means that the approach used by the SHMA and its Addenda is superseded. The Partial Review of the Fylde Local Plan to 2032 is accompanied by the Housing Needs and Requirement Background Paper 2020 which contains the Council’s local housing need assessment, produced in response to this change in national policy. The local housing needs assessment concludes that the minimum local housing need figure is 275 dwellings per annum. The Framework states that any needs that cannot be met in neighbouring areas should be added to this figure. However, as explained in Chapter 1 and set out in the draft statement of common ground and the Housing Needs and Requirement Background Paper, the unmet need in Wyre identified in the Wyre Local Plan (2011-2031) will be addressed through the review process of the Wyre Local Plan. The Council has considered the findings and has determined the housing requirement for the 2011-2032 plan period is 415 net dwellings per annum.</u></p>	<p>To accord with the requirements of NPPF19 paragraph 60.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 9.14	<p>The Framework requires that strategic policy-making authorities establish a housing requirement figure for the whole area (the Borough of Fylde), showing the extent to which the identified needs (and any that cannot be met in neighbouring areas) can be met. For the Local Plan, the Council had considered the findings of Addendum 3 to the SHMA and determined the housing requirement for the 2011-2032 plan period to be 415 net dwellings per annum. For the Partial Review of the Fylde Local Plan to 2032, having considered the existence of this adopted figure and the evidence provided by the Housing Needs and Requirement Background Paper 2020 using the government's standard method for housing need, the Council has determined the housing requirement figure for the plan period to be 6,895-8,715 net dwellings. This is derived from an annual requirement of 415 net dwellings for the period 2011-2019 and 275-415 net dwellings per annum from 2019-20 onwards. This revised housing requirement allows account to be taken of any need from neighbouring authorities that cannot be met, up to the amount of unmet need from the adopted Wyre Local Plan (2011-2031), should any need that cannot be met exist following Wyre's Partial Review. <del>This</del> The total figure of <del>415</del> 6,895-8,715 net dwellings <del>per annum</del> has been used to determine how much deliverable land is allocated in the Fylde Local Plan to 2032 which covers the period from 1 April 2011 – 31 March 2032, this is known as the planned provision. Fylde Council's role is to address the imperative of housing provision as positively as possible.</p>	<p>To accord with the requirements of NPPF19 paragraphs 60 and 65.</p> <p>Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.</p>



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Paragraph 9.15</b>	Councils are required to have a five year supply of housing land available. Where an authority is unable to demonstrate a five year supply, applications for housing development will be decided with regard to the 'presumption in favour of sustainable development' contained within <del>paragraph 14 of</del> the Framework. Unless there is an overriding reason why an application should be refused, the Council may find it difficult to resist development which it may consider unsuitable for other reasons. The housing supply will be reviewed at least annually as part of the Council's Authority Monitoring Report and Housing Land Supply Statement.	To remove reference to out-of-date NPPF12 paragraph number
<b>Paragraph 9.16</b>	The historic rate of delivery of new homes in Fylde, before the recession, averaged around 250 homes each year. The annual housing requirement for Fylde is <del>275-415</del> net dwellings per annum <del>for the remainder of the plan period. A calculation of 415 net dwellings per annum for 21 complete calendar years from 1 April 2011 to 31 March 2032 produces an</del> <u>The overall housing requirement figure of a minimum of is identified in the Housing Needs and Requirement Background Paper 2020 to be</u> <del>6,895-8,715</del> for the Plan period. The Council has identified sufficient sites, including an allowance for small sites and windfalls, to provide a supply figure of <b>8,819</b> homes over the Plan period.	To accord with the requirements of NPPF19 paragraphs 60 and 65.  Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Paragraph 9.17</b>	1,538 dwellings have been completed in Fylde from 2011-2017, an average of 256 dwellings per annum. When this figure is subtracted from the overall plan period requirement of <u>6,895</u> -8,715, it gives a residual requirement of <u>5,357</u> -7,177 dwellings to be completed from 2017 to 2032. This figure ( <u>5,357</u> -7,177) includes the shortfall which has accrued during the early years of the plan when large sites were in the planning process. This equates to <u>357</u> -479 dwellings per annum for the remaining years of the plan period. This is the 'Liverpool' method, for the purpose of calculating the 5 year housing land supply and is necessary in order to provide the most effective strategy to facilitate the delivery of housing during the plan period.	To accord with the requirements of NPPF19 paragraphs 60 and 65.  Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.
<b>Paragraph 9.18</b>	The housing requirement figure relates to all types of housing including apartments, family housing and housing for specific needs such as the elderly and includes both market and affordable housing. The allocation of new homes over the Plan period to 2032 is set out in policy <b>H1</b> below.	Paragraph included for continuity, no change has been made.
<b>Paragraph 9.19</b>	The trajectory at <b>Appendix 2</b> shows the anticipated delivery of homes in relation to the requirement, throughout the plan period to 2032. A detailed trajectory will be published at least annually as part of the Council's Housing Land Supply Statement. The Council's monitoring of housing completions has revealed that since the start of the Local Plan period a shortfall of 952 homes has accrued as at 31st March 2017. Planning application commitments amount to 6,111 homes as at 30th September 2017. This means that 70%- <u>88%</u> of the requirement for the plan period already has planning permission. Completions are anticipated to increase as larger sites commence delivery. The shortfall of 952 homes will be delivered over the remainder of the plan period to 2032.	To accord with the requirements of NPPF19 paragraphs 60 and 65.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Policy H1	<p>The Council will provide for and manage the delivery of new housing by:</p> <p>a) Setting and applying a <del>minimum</del> housing requirement of <b>415 net homes per annum for the plan period 2011-2032</b><del>2019</del> and a housing requirement of <b>275-415 net homes per annum for the period 2019-2032.</b></p> <p>b) Keeping under review housing delivery performance on the basis of rolling 3 year completion levels as set out in accordance with the Monitoring Framework at Appendix 8.</p> <p>c) Ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply calculated using the “Liverpool” method from the start of each annual monitoring period and in locations that are in line with the Policy <b>DLF1</b> (Development Locations for Fylde) and suitable for developments that will provide the range and mix of house types necessary to meet the requirements of the Local Plan.</p> <p>d) The delivery of the developable sites, which are allocated for housing and mixed use from 1 April 2011 to 31 March 2032 and provided for through allowances, to provide for a minimum of <del>6,895</del>-8,715 homes.</p>	<p>To accord with the requirements of NPPF19 paragraphs 60 and 65.</p> <p>Housing numbers edited due to revised housing requirement figure resulting from change to housing needs methodology in NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Paragraph 9.22</b>	<p>To make sufficient land available to deliver a minimum of <u>6,895</u>-8,715 new homes up to the end of the Plan period in 2032 the Council will:</p> <ul style="list-style-type: none"> <li>• allocate land for residential development;</li> <li>• take into account existing commitments where planning permission has been granted, the Council is minded to approve, and development that may or may not have commenced;</li> <li>• monitor completions; and</li> <li>• consider the possibility of small (not allocated) and windfall sites coming forward outside the Local Plan making process, including long term empty homes re-entering the market.</li> </ul>	To accord with the requirements of NPPF19 paragraphs 60 and 65.
<b>Paragraph 9.24</b>	<p><b>Performance Monitoring Indicator 1</b>, in <b>Appendix 8</b>, sets out a target / policy outcome to record the net additional homes completed against the residual requirement of <u>357</u>-479 per annum. <b>Performance Monitoring Indicator 2</b> sets out a target / policy outcome to achieve a 5 year supply of housing land. <b>Performance Monitoring Indicator 3</b> sets out a target / policy outcome to have a housing trajectory that delivers a minimum of <u>6,895</u>-8,715 homes over the plan period.</p>	To accord with the requirements of NPPF19 paragraphs 60 and 65.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 9.49	The Framework recommends that councils should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area (The Framework, paragraph 53). The amount of residential development that has been permitted on garden land over recent years in Fylde has been relatively low. There has been an average of two residential completions in gardens each year in Lytham and St Annes, with a total of five in Kirkham (2003- 2014), one in Warton, none in Freckleton and two in the rural areas. It is, however, acknowledged that concern about the impact of proposals can be particularly acute. Policy H2 only allows for garden land development subject to stringent caveats relating to design, character, access, amenity and other matters.	Paragraph number from NPPF12 removed; text is still in accordance with NPPF19
<b>Paragraph 9.57</b>	The Framework states that councils should <del>normally approve planning applications for change to residential use and any associated development from commercial buildings (Class B uses) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate</del> <u>support proposals for alternative uses of land which is currently developed but not allocated, where this would help to meet identified development needs. However, the Local Plan provides for the identified needs to be met without the wholesale loss of existing business premises.</u>	Amended to accord with NPPF19 paragraph 121

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Paragraph 9.58</b>	The Framework <u>makes it quite clear that planning policies and decisions need to reflect changes in the demand for land</u> <del>states that the long term retention of allocated sites should be avoided where there is no reasonable prospect of the land being brought forward for B1, B2 and B8 uses.</del> However, the Fylde Employment Land Study recommends that the Council should protect existing employment sites that are not the subject of consents for alternative uses. The Study states that all existing business and industrial land and premises should be retained as there is a shortage within Fylde. See Chapter 8 for detailed policy on employment land in Fylde.	Paragraph 9.58 quotes from NPPF12, the text from NPPF12 has been deleted and been replaced with a more general reference to the Framework.
<b>Paragraph 9.67</b>	The figure of 249 per annum would represent a large proportion of the <u>275-415</u> per annum requirement of all housing for Fylde, and this would therefore be undeliverable. The private rented sector in Fylde is of considerable importance in providing accommodation for those in affordable housing need, particularly for small units of accommodation. The SHMA shows that 61.8% of housing benefit claimants in Fylde live in the private rented sector, compared to the figure of 34.5% for England. There has been a growing number of HMOs and flat conversions. Whether this has provided an ideal form of accommodation for those in housing need cannot be known for certain, but the expression of bids for the stock of the affordable housing providers through MyHomeChoiceFyldeCoast demonstrates demand unfulfilled by the private rented sector.	To accord with the requirements of NPPF19 paragraphs 60 and 65.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Policy H6	<p>...</p> <p>4. Where the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting; <u>or</u></p> <p><u>5. Where the development would involve the subdivision of an existing residential dwelling.</u></p>	To accord with revised wording in NPPF19 paragraph 79.
Chapter 10: Health and Wellbeing	<b>No changes to be made to this chapter</b>	
Chapter 11: Infrastructure, Service Provision and Transport		
Paragraph 11.1	<p>A vital element of sustainable development is the provision and delivery of local services and infrastructure. However, lack of infrastructure should not be seen as an obstacle to development. <del>One of the 12 core planning principles set out in the Framework states that</del> Planning should proactively drive and support sustainable economic development, and this includes the delivery of infrastructure. Additionally, the Framework requires that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure.</p>	<p>Removal of out of date reference to core planning principles from NPPF12; these have been deleted in NPPF19 so the reference to the Framework is removed.</p> <p>The final sentence has been altered to accord with Paragraph 81 c) of the NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 11.2	<p><b>What is Infrastructure?</b></p> <p>Infrastructure has a broad definition and includes, but is not restricted to the following: .....</p> <ul style="list-style-type: none"> <li>• <b>Information and Communications Technology:</b> <del>telecommunications</del> <u>electric communications</u>, broadband and cable television.....</li> </ul>	References to telecommunications in NPPF12 have been changed to electronic communications in NPPF19.
Paragraph 11.7	<p>Whilst new infrastructure will be required to deliver the level of development identified in the Local Plan, it is important that it is located so that it makes the most efficient use of existing infrastructure. Development should be directed toward those settlements that have a good range of existing infrastructure and services before considering areas where there are deficits requiring investment and improvement. However, it is also important that improvements, such as <del>telecommunications</del> <u>electric communications</u> and broadband to serve new businesses, are identified and that the Local Plan helps make these improvements happen.</p>	References to telecommunications in NPPF12 have been changed to electronic communications in NPPF19.



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 11.12	<p>The <b>IDP</b> has established the essential infrastructure that will be needed to help deliver all of the development identified both within and outside the four Strategic Locations for Development, (see chapters 5 and 6). There are a number of infrastructure providers, including the utility services – water, sewerage treatment, electricity, gas and <del>telecommunications</del> <u>electronic communications</u>. These bodies are required to co-operate with the Council on issues of common concern in strategic planning under the ‘Duty to Cooperate.’ Local public sector providers, including health and education, are supported by national government sources of funding but this is generally aimed at catering for existing demand plus some ‘natural’ growth and refurbishment / replacement programmes.</p>	<p>References to telecommunications in NPPF12 have been changed to electronic communications in NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 11.59	<p>The Framework encourages councils to set local parking standards for residential and non-residential development, taking into account:</p> <ul style="list-style-type: none"> <li>• the accessibility of the development;</li> <li>• the type, mix and use of development;</li> <li>• the availability of and opportunities for public transport;</li> <li>• local car ownership levels; and</li> <li>• an overall need to reduce the use of high emission vehicles <u>and ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</u></li> </ul> <p>Councils should only impose <del>local</del> <u>maximum</u> parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network, <u>or for optimising the density of development in city and town centres and other locations that are well served by public transport. In town centres local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.-</u></p>	<p>FLP32 contains some quoted content from Paragraph 39 of NPPF12. The final bullet point requires updating to reflect the content of Paragraph 105 e) of the NPPF19.</p> <p>The text in the final sentence of Paragraph 11.59 contains out-of-date wording relating to NPPF12 and should be amended to ensure conformity with Paragraph 106 of NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Chapter 12: Water Management, Flood Risk and Climate Change	No changes to be made to this chapter	
Chapter 13: Conserving and Enhancing the Natural, Historic and Built Environment		
Policy ENV1. Landscape	Development will have regard to its visual impact within its landscape context and the landscape type in which it is situated. Development will be assessed to consider whether it is appropriate to the landscape character, amenity and tranquillity within which it is situated, as identified in the Lancashire Landscape Character Assessment, December 2000 or any subsequent update. <del>Development will also need to have regard to any impact on valued landscapes.</del> In addition: ...	Paragraph 170a) NPPF 19 states that valued landscapes should only be protected commensurate with their statutory status or if they have been identified in a development plan. The FBLP32 does not designate any valued landscape therefore this reference to valued landscapes has been removed in line with NPPF19.

<p><b>Policy</b> <b>ENV1.Coastal</b> <b>Change</b> <b>Management</b> <b>Areas</b></p>	<p>The open and coastal character of the Coastal Change Management Areas, which are identified on the <b>Policies Map including Inset Plans</b>, will be protected. Development in the Coastal Change Management Areas will only be permitted where the development meets all of the following criteria:</p> <ul style="list-style-type: none"> <li>i. Exceptionally requires a coastal location;</li> <li>ii. Is appropriate and in keeping with the open character of the coastline;</li> <li>iii. <del>Does not adversely affect the nature conservation assets</del> <u>Promotes the conservation, restoration and enhancement</u> of the coastline, predominantly the Ribble and Alt Estuaries SPA/Ramsar. Project specific Habitats Regulations Assessments (HRAs) will be required for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no likely significant effect upon European Sites before the tourism and coastal defence developments can be granted consent.</li> <li>iv. Does not detract from the tourism value or facilities along the coastline ;</li> <li>v. Does not interfere with natural coastal processes, unless the development forms part of an agreed programme of sea defence enhancement, in accordance with the Fylde Coast Shoreline Management Plan;</li> </ul>	<p>The revision has been made to reflect the wording of NPPF19 which is about achieving measurable net gain in Biodiversity.</p>
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Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p>vi. Does not impede the function of any existing sea defence structures and wherever possible enhances the coastal protection measures; and</p> <p>vii. Accords with the Development Strategy of this Local Plan.</p> <p>Where development does occur in these areas, developer contributions will be sought for the conservation, management and enhancement of important wildlife habitats and the creation of new habitats. This will include the improvement and management of Starr Hills Local Nature Reserve and the creation of new Local Nature Reserves. Contributions will be made through S106 Agreements and / or the Community Infrastructure Levy.</p>	

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 13.6	<p>In addition, new development adjacent to existing settlements that would impact upon the landscape should incorporate a landscaped buffer in order to avoid further 'hard edges' being visible. It is expected that landscape buffers will predominantly consist of tree planting using native species. New infrastructure should also be screened using a landscaped buffer, comprising of substantial shelter belts of native planting. Where new highways are effectively landscaped using tree planting, such landscaping also has the benefit of forming a barrier against noise and pollution. The Council will encourage appropriate landscaping on new development sites, including tree planting, which complements existing natural features such as hedges and ponds. In rural areas all tree, shrub and hedge planting schemes should make use of native species. <del>The Council intends to carry out landscape appraisals to assist in identifying valued landscapes that accord with paragraph 109 of the Framework.</del></p>	<p>Paragraph 13.6 contains an out of date reference to paragraph 109 of the NPPF12. Paragraph 170a) NPPF19 states that valued landscapes should only be protected commensurate with their statutory status or if they have been identified in a development plan. The FLP32 does not designate any valued landscape therefore this reference to valued landscapes has been removed in line with NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraphs 13.16 and paragraph 13.17	<p><del>Areas of Tranquillity</del><u>Tranquil Areas</u></p> <p><b>13.16</b> The Campaign to Protect Rural England (CPRE) commissioned a survey to establish the qualities people value most in the English countryside. Nearly three-quarters (72%) of respondents said that tranquillity topped the list. Following this, the CPRE worked with university researchers to map the tranquillity levels of all areas across England, using a rigorous set of indicators to measure tranquillity. The evidence that tranquillity is extremely important to the majority of people has validated the CPRE's campaign to protect tranquillity in England. <del>Areas of Tranquillity</del><u>Tranquil areas</u> have remained relatively undisturbed by noise and are prized for their recreational and amenity value.</p> <p><b>13.17</b> The CPRE's tranquillity maps make it possible to create policies and take decisions about land use to protect and enhance tranquillity and confidently monitor how well the policies are working. Tranquillity is a highly valued characteristic of the English countryside and one of the most important indicators of its quality. The identification and protection of <del>Areas of Tranquillity</del><u>Tranquil areas</u> complies with <del>paragraph 123</del> of the Framework.</p>	<p>Areas of Tranquillity NPPF12 have been renamed Tranquil Areas by NPPF19, the reference to paragraph 123 has changed therefore it has been deleted, leaving a reference to the Framework.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<p><b>Policy ENV2</b></p> <p><b>b) Development within or affecting nature conservation sites and ecological networks</b></p> <p><b>Criterion iv)</b></p>	<p>Where development is considered necessary, adequate mitigation measures and compensatory habitat creation will be required through planning conditions and / or obligations, <del>with the aim of providing an overall improvement in the site's biodiversity value, in order to secure measurable net gains for biodiversity. Where compensatory habitat is provided it should be of at least equal area and biodiversity if not larger and more diverse than that which is being replaced.</del> Measures should be put in place for the ongoing management of such features.</p>	<p>The text in criterion b) is out of date, with respect to paragraph 174 of NPPF19</p>



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Policy ENV2</b> <b>Section 2 Priority Species Protection</b>	<p>Planning permission will not be granted for development which would have an adverse effect on a priority species or its habitat, unless the benefits of the development outweigh the need to maintain the population of the species in situ. Should development be permitted that might have an adverse effect on a priority species or its habitat, planning conditions or agreements will be used to:</p> <ul style="list-style-type: none"> <li>a) Ensure the survival of the individual species affected; and where this cannot be achieved:</li> <li>b) Reduce the disturbance to a minimum;</li> <li>c) Provide adequate alternative habitats to enhance the viability of the local population of that species; and</li> <li>d) Promote the <del>preservation</del><u>conservation</u>, restoration and <del>recreation</del><u>enhancement</u> of priority habitats, <u>ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.</u></li> </ul>	<p>To accord with NPPF19 paragraph 174</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
Paragraph 13.29	<p><del>Paragraph 9 of the Framework stresses the importance of moving from a net loss of biodiversity to achieving net gains for nature as part of achieving sustainable development. providing net gains for biodiversity; including by establishing coherent ecological networks that are more resilient to current and future pressures. Section 11 of the Framework plus other legislation, regulations and guidance set out both how this is to be achieved, and legal duties and requirements for nature conservation. Performance Monitoring Indicator 14, in Appendix 8, sets out a target / policy outcome to achieve net gains in biodiversity. Opportunities for new biodiversity features within or near to development should be taken. This could be in association with infrastructure, such as highways and flood defences. In particular, tree planting can be effective in screening highways and other infrastructure that has a detrimental impact on the landscape. Other opportunities can include leaving areas of open space unmown, planting small areas of greenspace with wildflower species and native shrubs or incorporating new or existing ponds and SuDs within or close to new development.</del></p>	Paragraph 13.29 contained two out of date references to NPPF12 and the reference to net gain needed updating to reflect the content of NPPF19.
Paragraph 13.36	<p><del>The Framework requires councils to plan positively for the creation, protection, enhancement and management of biodiversity and Green Infrastructure. take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.</del> Despite an abundance of resources that contribute to the Green Infrastructure network, there are deficiencies in Fylde and access to some of the Borough's most important Green Infrastructure assets is limited. New evidence has been provided by the Open Space Study Update and the new Playing Pitch Strategy, both of which were issued in 2016. The Open Space Study Update identifies the following typologies:</p>	FLP32 contains content from NPPF12 paragraph 114, this needs updating to reflect the content of paragraph 171 of NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Policy ENV3 Criterion a)</b>	<p>The areas of Existing Open Space provide a critically important part of the Green Infrastructure network within Fylde. Existing Open Space will be protected from inappropriate development, having particular regard to the multi-functional benefits of open spaces, as follows:</p> <p>a) Existing Open Space, including sports and playing pitches (subject to policy <b>HW3: Protection and Provision of Indoor and Outdoor Sports Facilities</b>), will be protected unless the requirements of paragraph <del>74</del><sup>97</sup> of the Framework are met and the findings of any published and adopted needs assessment are met.</p>	<p>This specific reference to the paragraph number in Policy ENV3 was required by the Local Plan Inspector who examined the FLP32 and is an integral part of the policy. The content of NPPF12 paragraph 74 is repeated in NPPF19 paragraph 97, with a very minor addition; therefore the reference to paragraph 74 should be changed to 97.</p>
<b>Paragraph 13.52</b>	<p>Heritage assets are buildings, monuments, sites, places or landscapes that have heritage significance. Such assets include designated heritage assets such as listed buildings and conservation areas and locally important assets such as locally listed buildings and locally important areas, including landscapes. Where a proposed development will result in substantial harm or total loss of a designated heritage asset, consent will only be granted where it can be demonstrated that the substantial public benefits outweigh that harm or loss as set out in <del>paragraph 133</del> of the Framework.</p>	<p>Out of date paragraph number from NPPF12.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>Paragraph 13.59</b>	<del>The Framework advises councils that</del> Local heritage can be significant and go well beyond nationally designated assets. It is highly probable that there are many unlisted buildings of particular significance and quality in Fylde that have little by way of formal recognition or protection.	This text is not included in NPPF19 therefore it is deleted.
<b>Glossary</b>		

	<p><b>Affordable Housing (Definitions from the Framework (2012))</b></p> <p><del><b>Social rented, affordable rented and intermediate housing</b></del>, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.</p> <ul style="list-style-type: none"> <li>• <del><b>Social rented housing</b></del> is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the HCA.</li> <li>• <del><b>Affordable rented housing</b></del> is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).</li> <li>• <del><b>Intermediate housing</b></del> is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.</li> <li>• <del><b>Low cost home ownership (to be completed on publication of Government definition)</b></del></li> </ul> <p>For the purposes of policy <del>H4</del> in Chapter 9, in addition to <del>Registered Providers</del>, as defined in the Housing Act 2004, the Local Planning Authority will treat the delivery of affordable housing by a body which is not a Registered Provider, but is able to</p>	<p>To accord with the revised definition in NPPF19 glossary.</p>
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	<p>assure the Council that it operates to the same codes of practice as a Registered Provider. Homes that do not meet the above definitions of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes.</p> <p><b><u>Affordable Housing (Definitions from the Framework (2019))</u></b></p> <p><u>Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:</u></p> <p><b><u>a) Affordable housing for rent:</u></b> meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).</p> <p><b><u>b) Starter homes:</u></b> is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.</p> <p><b><u>c) Discounted market sales housing:</u></b> is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local</p>	
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Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p><u>house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.</u></p> <p><u>d) <b>Other affordable routes to home ownership:</b> is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.</u></p>	
<b>Glossary</b>	<p><b>Infrastructure</b></p> <p>Infrastructure has a broad definition and includes, but is not restricted to the following which are needed to support housing, industrial and commercial uses: .....</p> <p><b>Information and communications technology:</b> <del>telecommunications</del><u>electronic communications</u>, broadband and cable television; .....</p>	<p>References to telecommunications in NPPF12 have been changed to electronic communications in NPPF19.</p>

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
	<p><b>National Planning Policy Framework (the Framework)</b></p> <p>The Framework sets out the Government’s planning policies for England and how they are expected to be applied. It must be taken into account in the preparation of local and neighbourhood development plans and it is a material consideration in planning decisions. <u>The original version of the Framework was published in March 2012. A revised version of the Framework was published in July 2018, and a further version with minor revisions was published in February 2019. All references to the Framework refer to the revised version published in February 2019, except where specified to the contrary in the text. This Partial Review 2020 version of the Local Plan incorporates revisions to ensure that the Local Plan remains compliant with the Framework.</u></p>	<p>Modified to introduce the revised 2018 and 2019 versions of the Framework, and to explain how the Local Plan has been revised through the Partial Review to accord.</p>
<p><b>Appendix 1: Schedule of saved policies from the Fylde Borough Local Plan (As Altered), October 2005</b></p>		



Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>FBLP Policy EMP5</b>	[To be replaced by the Framework]  Paragraph <del>164</del> <u>95</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policy TREC5</b>	[To be replaced by the Framework]  Paragraphs <del>26 and 27</del> <u>89 and 90</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policies TREC15 and TREC16</b>	[To be replaced by the Framework]  Paragraph <del>28</del> <u>83</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>FBLP Policy EP26</b>	[To be replaced by the Framework]  Paragraph <del>124</del> 181 of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policy EP27</b>	[To be replaced by the Framework]  Paragraph <del>123</del> 180 and 182 of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policy EP28</b>	[To be replaced by the Framework]  Paragraph <del>125</del> 180 of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>FBLP Policy EP30</b>	[To be replaced by the Framework]  Paragraphs <del>100</del> <u>155-165</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policies SH13 and SH14</b>	[To be replaced by the Framework]  Paragraphs <del>24, 25, 26, 27</del> <u>86, 87, 88, 89 and 90</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>FBLP Policy SH15</b>	[To be replaced by the Framework]  Paragraph <del>25</del> <u>88</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
<b>FBLP Policy CF8</b>	[To be replaced by the Framework]  Paragraph <del>43</del> <u>113</u> of the Framework	To ensure the 'To be replaced by the Framework' section in Appendix 1 accords with the new paragraph numbering in NPPF19.
<b>Appendix 2: Housing Trajectory</b>		
<b>Appendix 8 Performance Monitoring Framework</b>		
Indicator 1 Trigger for Action	(1) Failure to deliver 95% of the residual number over a 3-year rolling period, i.e. 1,365 net homes over 3 years; (2) Failure to deliver 85% of the requirement over a 3-year rolling period, i.e. 1,221 net homes over 3 years (3) Failure to deliver <del>65%</del> <u>75%</u> of the requirement over a 3-year rolling period, i.e. <del>934</del> <u>1,078</u> net homes over 3 years	Consistency with approach of housing delivery test
<b>Appendix 9: Evidence Base</b>		

Chapter and Policy/Paragraph in FLP32	Revision	Reason for Change
General	<ul style="list-style-type: none"> <li>➤ National Planning Policy Framework, 2012</li> <li>➤ National Planning Policy Framework, 2018</li> <li>➤ <u>National Planning Policy Framework, 2019</u></li> <li>➤ Planning Practice Guidance (PPG: March 2014 <u>to November 2019</u>)</li> <li>➤ North West of England Regional Spatial Strategy to 2021, 2008</li> </ul>	To ensure reference is made to NPPF19 and the updated PPG

**Appendix 1:** Proposed Strategic and Non-Strategic Policies in the Partial Review of the Fylde Local Plan to 2032.

Paragraph 21 of NPPF19 states that “plans should make explicit which policies are strategic policies.” Where a single Local Plan is prepared, the non-strategic policies should be clearly distinguished from the strategic policies. Table 1 shows the policies within the Fylde Local Plan to 2032, and how this revision will be shown in the Partial Review of the Fylde Local Plan to 2032. The new text is underlined.

Table 1: Proposed Strategic and Non-Strategic Policies in the Fylde Local Plan to 2032

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
<b>Chapter 5: The Development Strategy</b>		
Policy S1: The Proposed Settlement Hierarchy	Strategic	<u>Strategic</u> Policy S1: The Proposed Settlement Hierarchy
Policy DLF1: Development Locations for Fylde	Strategic	<u>Strategic</u> Policy DLF1: Development Locations for Fylde
<b>Chapter 6: Strategic Locations for Development</b>		
Policy M1: Masterplanning the Strategic Locations for Development	Strategic	<u>Strategic</u> Policy M1: Masterplanning the Strategic Locations for Development
Policy SL1: Lytham and St Annes Strategic Locations for Development	Strategic	<u>Strategic</u> Policy SL1: Lytham and St Annes Strategic Locations for Development
Policy SL2: The Fylde-Blackpool Periphery Strategic Locations for Development	Strategic	<u>Strategic</u> Policy SL2: The Fylde-Blackpool Periphery Strategic Locations for Development

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy SL3: Warton Strategic Location for Development	Strategic	<u>Strategic</u> Policy SL3: Warton Strategic Location for Development
Policy SL4: Kirkham and Wesham Strategic Location for Development	Strategic	<u>Strategic</u> Policy SL4: Kirkham and Wesham Strategic Location for Development
Policy SL5: Development Sites outside the Strategic Locations for Development	Strategic	<u>Strategic</u> Policy SL5: Development Sites outside the Strategic Locations for Development
<b>Chapter 7: General Development Policies</b>		
Policy GD1: Settlement Boundaries	Non – strategic	<u>Non-strategic</u> Policy GD1: Settlement Boundaries
Policy GD2: Green Belt	Strategic	<u>Strategic</u> Policy GD2: Green Belt
Policy GD3: Areas of Separation	Strategic	<u>Strategic</u> Policy GD3: Areas of Separation
Policy GD4: Development in the Countryside	Strategic	<u>Strategic</u> Policy GD4: Development in the Countryside
Policy GD5: Large Developed Sites in the Countryside and Green Belt	Non-strategic	<u>Non-strategic</u> Policy GD5: Large Developed Sites in the Countryside and Green Belt

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy GD6: Promoting Mixed Use Development	Strategic	<u>Strategic</u> Policy GD6: Promoting Mixed Use Development
Policy GD7: Achieving Good Design in Development	Strategic	<u>Strategic</u> Policy GD7: Achieving Good Design in Development
Policy GD8: Demonstrating Viability	Strategic	<u>Strategic</u> Policy GD8: Demonstrating Viability
Policy GD9: Contaminated Land	Non-strategic	<u>Non-strategic</u> Policy GD9: Contaminated Land
<b>Chapter 8: The Fylde Economy</b>		
Policy EC1: Overall Provision of Employment Land and Existing Employment Sites	Strategic	<u>Strategic</u> Policy EC1: Overall Provision of Employment Land and Existing Employment Sites
Policy EC2: Employment Opportunities	Strategic	<u>Strategic</u> Policy EC2: Employment Opportunities
Policy EC3: Lancashire Advanced Engineering and Manufacturing Enterprise Zone, at BAE Systems, Warton	Strategic	<u>Strategic</u> Policy EC3: Lancashire Advanced Engineering and Manufacturing Enterprise Zone, at BAE Systems, Warton



Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy EC4: Blackpool Airport Enterprise Zone	Strategic	<u>Strategic</u> Policy EC4: Blackpool Airport Enterprise Zone
Policy EC5: Vibrant Town, District and Local Centres	Strategic	<u>Strategic</u> Policy EC5: Vibrant Town, District and Local Centres
Policy EC6: Leisure, Culture and Tourism Development	Strategic	<u>Strategic</u> Policy EC6: Leisure, Culture and Tourism Development
Policy EC7: Tourism Accommodation	Non-strategic	<u>Non-strategic</u> Policy EC7: Tourism Accommodation
<b>Chapter 9: Provision of Homes in Fylde</b>		
Policy H1: Housing Delivery and the Allocation of Housing Land	Strategic	<u>Strategic</u> Policy H1: Housing Delivery and the Allocation of Housing Land
Policy H2: Density and Mix of New Residential Development	Strategic	<u>Strategic</u> Policy H2: Density and Mix of New Residential Development
Policy H3: Conversions and Change of Use to Residential	Non-strategic	<u>Non-strategic</u> Policy H3: Conversions and Change of Use to Residential
Policy H4: Affordable Housing	Strategic	<u>Strategic</u> Policy H4: Affordable Housing

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy H5: Gypsies, Travellers and Travelling Showpeople's Sites	Strategic	<u>Strategic</u> Policy H5: Gypsies, Travellers and Travelling Showpeople's Sites
Policy H6: Isolated New Homes in the Countryside	Non-strategic	<u>Non-strategic</u> Policy H6: Isolated New Homes in the Countryside
Policy H7: Replacements of, and Extensions to, Existing Homes in the Countryside	Non -strategic	<u>Non-strategic</u> Policy H7: Replacements of, and Extensions to, Existing Homes in the Countryside
<b>Chapter 10: Health and Wellbeing</b>		
Policy HW1: Health and Wellbeing	Strategic	<u>Strategic</u> Policy HW1: Health and Wellbeing
Policy HW2: Community Facilities	Strategic	<u>Strategic</u> Policy HW2: Community Facilities
Policy HW3: Protection and Provision of Indoor and Outdoor Sports Facilities	Strategic	<u>Strategic</u> Policy HW3: Protection and Provision of Indoor and Outdoor Sports Facilities
<b>Chapter 11: Infrastructure, Service Provision and Transport</b>		
Policy INF1: Service Accessibility and Infrastructure	Strategic	<u>Strategic</u> Policy INF1: Service Accessibility and Infrastructure

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy INF2: Developer Contributions	Non-strategic	<u>Non-strategic</u> Policy INF2: Developer Contributions
Policy T1: Strategic Highway Improvements	Strategic	<u>Strategic</u> Policy T1: Strategic Highway Improvements
Policy T2: Warton Aerodrome	Strategic	<u>Strategic</u> Policy T2: Warton Aerodrome
Policy T3: Blackpool Airport	Strategic	<u>Strategic</u> Policy T3: Blackpool Airport
Policy T4: Enhancing Sustainable Transport Choice	Strategic	<u>Strategic</u> Policy T4: Enhancing Sustainable Transport Choice
Policy T5: Parking Standards	Non-strategic	<u>Non-strategic</u> Policy T5: Parking Standards
<b>Chapter 12: Water Management, Flood Risk and Climate Change</b>		
Policy CL1: Flood Alleviation, Water Quality and Water Efficiency	Strategic	<u>Strategic</u> Policy CL1: Flood Alleviation, Water Quality and Water Efficiency

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy CL2: Surface Water Run-Off and Sustainable Drainage	Strategic	<u>Strategic</u> Policy CL2: Surface Water Run-Off and Sustainable Drainage
Policy CL3: Renewable and Low Carbon Energy Generation – excluding onshore wind turbines	Strategic	<u>Strategic</u> Policy CL3: Renewable and Low Carbon Energy Generation – excluding onshore wind turbines
Policy CL4: Decentralised Energy Networks and District Heating Systems	Strategic	<u>Strategic</u> Policy CL4: Decentralised Energy Networks and District Heating Systems
<b>Chapter 13: Conserving and Enhancing the Natural, Historic and Built Environment</b>		
Policy ENV1: Landscape	Strategic	<u>Strategic</u> Policy ENV1: Landscape
Policy ENV2: Biodiversity	Strategic	<u>Strategic</u> Policy ENV2: Biodiversity
Policy ENV3: Protecting Existing Open Space (Part of the Green Infrastructure network)	Strategic	<u>Strategic</u> Policy ENV3: Protecting Existing Open Space (Part of the Green Infrastructure network)
Policy ENV4: Provision of New Open Space (Part of the Green Infrastructure network)	Strategic	<u>Strategic</u> Policy ENV4: Provision of New Open Space (Part of the Green Infrastructure network)

Chapter and Policy in Fylde Local Plan to 2032	Is the Policy Strategic or Non-strategic?	Revision in Partial Review of Fylde Local Plan to 2032
Policy ENV5: Historic Environment	Strategic	<u>Strategic</u> Policy ENV5: Historic Environment



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Authorised by: Julie Glaister, Planning Policy Manager

**Fylde Council, Wyre Council, Blackpool Council  
And Lancashire County Council  
Draft Statement of Common Ground  
Plan-Making for Strategic Cross-Boundary Matters**

**March 2020**

Contents		
1	Introduction	2
2	Areas covered	3
3	Key strategic matters	5
4	Governance arrangements	6
5	Strategic matters: the timing of plan-making, revision and review	7
6	Strategic matters: housing needs	11
7	Strategic matters: housing requirements	14
8	Record of engagement on key strategic matters	16
9	Other strategic matters and how they will be addressed	17
10	The plan-making authorities and other signatories	18

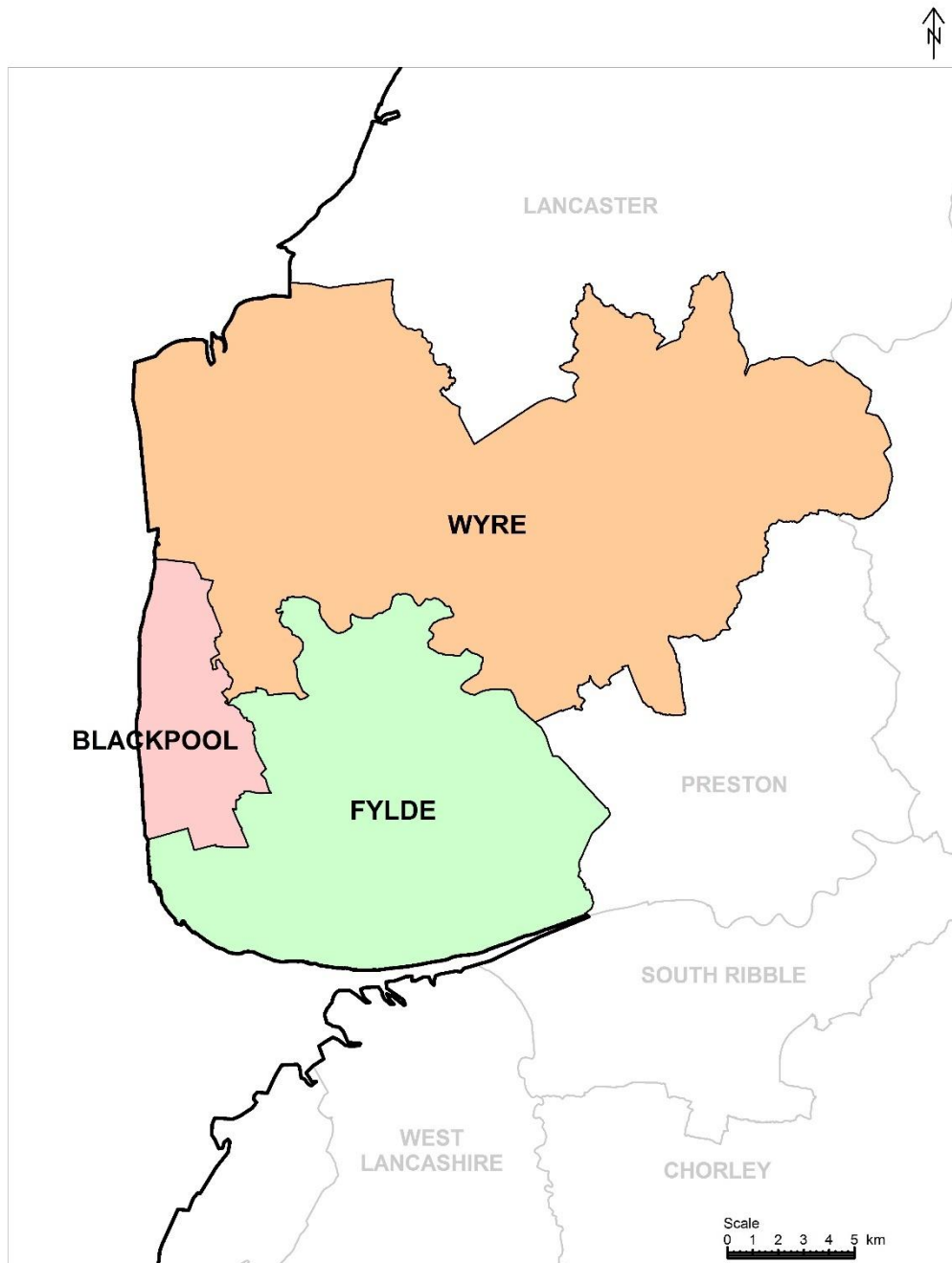
## 1. Introduction

- 1.1 This Statement of Common Ground has been produced in support of the Partial Review of the Fylde Local Plan to 2032. It provides an explanation of the strategic position of Fylde and neighbouring councils in relation to those cross-boundary strategic matters which fall within the extent of the revisions made by the Partial Review of the Fylde Local Plan to 2032, and explains engagement in relation to these matters to demonstrate compliance with the Duty to Co-Operate.
- 1.2 The Duty to Co-operate was introduced by the Localism Act 2011 as an amendment to the Planning and Compulsory Purchase Act 2004, to ensure that local planning authorities continued to take a strategic approach to planning for issues that extend across boundaries, following the abolition of regional planning. The Duty applies to all local planning authorities, county councils in England and to a number of other 'prescribed' bodies requiring them to co-operate with each other to address strategic planning matters relevant to their areas in the preparation of a development plan document (DPD). The duty requires ongoing constructive and active engagement on the preparation of DPDs and other activities relating to the sustainable development and use of land.
- 1.3 The Duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and other bodies engage constructively, actively and on an ongoing basis to develop strategic policies in the preparation of Local Plans and any documents and activities that can reasonably be considered to prepare the way for such plans;
  - requires councils to consider joint approaches to plan-making.
- 1.4 The Planning Practice Guidance (PPG) published by the Government explains the purpose of a statement of common ground:
- A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities, it also forms part of the evidence required to demonstrate that they have complied with the duty to cooperate.*
- 1.5 This document follows the broad structure advocated by the PPG. The strategic matters considered are restricted to those directly relating to changes proposed in the Partial Review of the Fylde Local Plan to 2032.



## 2. Areas covered

- 2.1 This statement covers the area of the Fylde Coast Sub-Region. The Fylde Coast Sub-Region comprises the three local authority areas of Fylde, Wyre and Blackpool Councils; in Fylde and Wyre the area is under the further jurisdiction of Lancashire County Council as higher-tier authority. The area covered is shown on the map below:



Fylde Coast Sub-Region

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- 2.2 The Fylde Coast sub-region encompasses the area covered by the unitary authority of Blackpool Council and the two-tier area covered by Lancashire County Council and the district councils of Fylde and Wyre. The area stretches from the Ribble Estuary in the south to Morecambe Bay in the north and the Forest of Bowland moorlands in the east. The area covers 384 sq km and is home to approximately 330,300 residents.
- 2.3 The Fylde Coast sub-region demonstrates a high level of self-containment in terms of housing markets, travel to work patterns and economic functionality. The Fylde Coast was identified as a housing market area within the Fylde Coast Strategic Housing Market Assessment (SHMA) (2014) based on both migration and commuting patterns. There is no evidence that this pattern has altered in the intervening period.
- 2.4 The economic functionality of the Fylde Coast is apparent through the strong travel to work patterns and employment with a shared tourism and cultural offer; regionally and nationally significant advanced manufacturing (BAE Systems at Warton and nuclear processing at Westinghouse Springfields); the Department for Work and Pensions; and a shared infrastructure including Blackpool Airport, coastal tramway and strategic highway and rail networks.
- 2.6 This economic coherence was reflected in the establishment of the Multi Area Agreement in April 2009 and the Blackpool, Fylde and Wyre Economic Development Company in April 2010 (rebranded the Blackpool Bay Company in 2011 and subsequently reconstituted as the Blackpool, Fylde and Wyre Economic Prosperity Board), to support local authority partnership working, co-ordinate and drive forward shared objectives and deliver a co-ordinated programme of capital investment.
- 2.7 The landscape across the sub-region is broadly similar, largely falling within the Lancashire and Amounderness Plain National Character Area (NCA), but with a portion of the North Wyre coast within the Morecambe Coast and Lune Estuary NCA. The sub-region encompasses part of the Forest of Bowland AONB.
- 2.8 The area adjoins the Irish Sea to the west, under the planning jurisdiction of the Marine Management Organisation, and the local planning authorities of Lancaster, Ribble Valley, Preston, South Ribble and West Lancashire.
- 2.9 The three authorities will each produce separate Statements of Common Ground with their immediate neighbours in relation to strategic matters that they share with their neighbours, other than as described in this document.

### 3. Key strategic matters

3.1 The strategic matters considered in this statement are the following:

**The timing of plan-making, revision and review**

**Housing needs**

**Housing requirements**

3.2 These strategic matters are those relevant to the Partial Review of the Fylde Local Plan to 2032. All other strategic matters will be dealt with, where necessary, through separate or subsequent statements.

## 4. Governance arrangements

- 4.1 This Statement of Common Ground has been developed under the Fylde Coast Duty to Co-Operate Memorandum of Understanding. This is a statement made jointly by Fylde Council, Wyre Council, Blackpool Council and Lancashire County Council that formalises the dialogue that takes place between the four authorities, providing for cross-border co-operation and collaboration regarding those strategic matters which require it and ensuring that the requirements of the statutory Duty to Co-operate are met.
- 4.2 The Memorandum of Understanding provides for regular meetings under the Fylde Coast Duty to Co-Operate banner. Quarterly Fylde Coast Duty to Co-operate Officers' Group meetings are held between officers from the Fylde Coast Authorities and LCC, where strategic planning issues are discussed. The Lancashire Enterprise Partnership (LEP) and representatives of Lancashire County Council and Blackpool Council transport authorities are also invited to attend these meetings.
- 4.3 In addition to the officers' meetings, the Memorandum of Understanding also provides for the Fylde Coast Authorities Joint Member and Officer Advisory Steering Group, which comprises councillors and senior officers from the Fylde Coast Authorities and LCC, to oversee the work under the Duty to Co-operate. A key remit of the Advisory Steering Group is to resolve difficult and sensitive issues, reaching common understanding.
- 4.4 This Statement of Common Ground will be subject to discussion leading to agreement at the Officers' Group and if necessary the Advisory Steering Group meetings, and any changes to it will be subject to ratification by those groups as appropriate.
- 4.5 The Fylde Coast Authorities officers and members Duty to Co-operate meetings are effective mechanisms for ensuring that strategic planning issues that cross council administrative boundaries between the Fylde Coast Authorities are given due consideration, are planned for and are delivered effectively through the plan making process.

## 5. Strategic matters: the timing of plan-making, revision and review

### Matters of Agreement

- 5.1 The plan-making stages of the Fylde Coast Authorities have been misaligned for some time. Two of the three authorities have full adopted Local Plans, whilst the third, Blackpool, has an adopted Core Strategy.

### Fylde

- 5.2 The Fylde local Plan to 2032 is a complete local plan containing strategic and non-strategic policies. It was submitted for examination in December 2016, prior to the publication of the National Planning Policy Framework (July 2018) (NPPF18). Following the publication of NPPF18, as the examination had not concluded, the examination continued and concluded and the adoption of the plan took place under the transitional arrangements of paragraph 214 of NPPF18, whereby the policies of the earlier National Planning Policy Framework of 2012 (NPPF12) continued to apply.

- 5.3 The Fylde Local Plan to 2032 was adopted on 22<sup>nd</sup> October 2018.

- 5.4 The Fylde Local Plan to 2032 paragraph 1.27 includes the following text reflecting the uncertainty during the examination as to the position in Wyre:

*Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing. Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed. Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate. The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.*

- 5.5 The Fylde Council Local Development Scheme (November 2019) includes the Partial Review of the Local Plan. It states:

*A Partial Review of the Fylde Local Plan to 2032 will bring the Local Plan in line with Paragraph 212 of the National Planning Policy Framework 2019. It will also consider the unmet housing need in Wyre in accordance with Paragraph 1.27 of the Fylde Local Plan to 2032.*

- 5.6 The LDS provides an indicative timetable for the production and examination of the Partial Review:

- The consideration of responses to the scoping consultation and its presentation to Planning Committee are provisionally scheduled for the period up to January 2020;
- the Schedule of Revisions for presentation to Planning Committee in January 2020;
- the production of technical assessments between January and March 2020;
- the presentation of the Publication Version to Planning Committee in March 2020;
- publication for public consultation between March and May 2020;
- submission in May 2020; examination in June-July 2020; and

- adoption in September 2020.

5.7 The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 requires that local planning authorities review local plans such that the review is completed within 5 years from the adoption date of the local plan. NPPF18 and the revised version of it published in February 2019 (NPPF19) include this requirement to review within 5 years and include policy as to which plan policies will need updating. Fylde Council will carry out a full review of the Local Plan within the five-year statutory period. There is therefore no need for the Partial Review of the Fylde Local Plan to 2032 to extend wider than the remit intended.

## Wyre

5.8 The Wyre Local Plan (2011-2031) is a complete Local Plan containing strategic and non-strategic policies. It was submitted for examination in January 2018, prior to the publication of NPPF18. Following the publication of NPPF18, as the examination had not concluded, the examination continued and concluded and adoption of the plan took place under the transitional arrangements of paragraph 214 of NPPF18 and NPPF19, whereby the policies of NPPF12 continued to apply.

5.9 The Wyre Local Plan (2011-2031) was adopted on 28<sup>th</sup> February 2019.

5.10 The Wyre Local Plan (2011-2031) Policy LPR1 makes a commitment to conduct a Partial Review of the plan. It states:

*The Local Planning Authority will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. This will commence before the end of 2019 with submission of the review for examination by early 2022. Specific matters to be addressed by the review include the following:*

*1. An update of Objectively Assessed Housing Needs.*

*2. A review of transport and highway issues taking into account:*

*(i) housing commitments and updated housing needs;*

*(ii) implemented and committed highway schemes;*

*(iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and*

*(iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.*

*3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.*

5.11 Wyre Council intends to update its Local Development Scheme to provide an indicative timetable for the production and examination of the Partial Review.

5.12 The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 requires that local planning authorities review local plans such that the review is completed within 5 years from the adoption date of the local plan. NPPF19 includes this requirement to review within 5 years and to identify which policies will need updating. Wyre Council will carry out a full review of the Local Plan within the five-year statutory period. Wyre Council

has commenced its Partial Review through its consultation, under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, on the scope of the Partial Review of the Wyre Local Plan (2011-2031) for 6 weeks from 28<sup>th</sup> February 2020, but it will necessarily include the matters within Policy LPR1 above. In addition, in accordance with paragraph 10.4.4 of the Wyre Local Plan (2011-2031), the Partial Review will seek to address any inconsistencies with the revised NPPF.

## **Blackpool**

- 5.13 The Blackpool Local Plan Part 1: Core Strategy (2012 – 2027) is a Development Plan Document that provides an overall strategy for the location of housing employment, retail and leisure development, identifies areas for regeneration, protection and enhancement, and sets out key development management principles. It is intended as the first part of a two-part local plan. It contains strategic policies and some non-strategic policies.
- 5.14 The Blackpool Local Plan Part 1: Core Strategy (2012 – 2027) was adopted on 20<sup>th</sup> January 2016.
- 5.15 The Blackpool Local Plan Part 1: Core Strategy (2012 – 2027) was submitted, examined and adopted under the policies of NPPF12. In accordance with paragraph 213 of NPPF19, the policies of the adopted core strategy remain up to date providing that they are consistent with the policies of NPPF19. Where policies are less consistent with NPPF19, the weight that may be given to them is reduced.
- 5.16 Blackpool Council consulted on a Scoping Document for the Blackpool Local Plan Part 2: Proposed Site Allocations and Development Management Policies between 12<sup>th</sup> June 2017 and 24<sup>th</sup> July 2017. It then published a Blackpool Local Plan Part 2: Proposed Site Allocations and Development Management Policies document as an informal consultation paper in January 2019. This draft Part 2 plan operates over the same plan period as the Part 1 Core Strategy, i.e. 2012-2027. The draft Part 2 plan was prepared having regard to NPPF18 (having been published prior to NPPF19), but is informed by the strategic policies in the adopted Part 1 Core Strategy, which is the principal Development Plan Document for Blackpool.
- 5.17 Blackpool Council does not have a current published Local Development Scheme. Consultation on the Regulation 19 Publication Version of the Part 2 was delayed due to the general election but is expected to take place in 2020.
- 5.18 The Blackpool Local Plan Part 1: Core Strategy (2012 – 2027), plus the Part 2 plan once published, submitted, examined and adopted, will form a complete local plan for Blackpool.
- 5.19 The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2017 requires that local planning authorities review local plans such that the review is completed within 5 years from the adoption date of the local plan. NPPF19 includes this requirement to review within 5 years and include policy as to which policies will need updating. Blackpool Council will need to carry out a full review of the policies in the Blackpool Local Plan Part 1: Core Strategy (2012 – 2027) within the five-year statutory period, i.e. to be complete by January 2021. This review will follow on from the adoption of the Part 2 plan.

**Matters of Disagreement**

None recorded relating to this section

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## 6. Strategic matters: housing needs

### Matters of Agreement

#### Fylde:

- 6.1 The adopted Fylde Local Plan to 2032 evidence base was provided by the Fylde Coast SHMA (2014) and its three Addenda, the last of which (Fylde Addendum 3: Analysis of the OAN in light of the 2014-based SNPP and SNHP (Turley, May 2017), accompanied by the Independent Assessment of the Economic Prospects of Fylde (Amion Consulting, May 2017)) gave an Objectively Assessed Need (OAN) for housing as a range of 410-430 dwellings per annum. This evidence was produced in accordance with NPPF12 and PPG dating from 2014. Following the Examination of the FLP32, the Inspector concluded that the housing requirement figure of 415 dwellings per annum was sound and appropriate to meet needs.
- 6.2 Fylde Council is to carry out a Partial Review of the Fylde Local Plan to 2032. The Partial Review develops necessary changes to the Local Plan to accord with NPPF19, as required by paragraph 212 of NPPF19. In addition, it considers the issue of unmet need in Wyre, as required by paragraph 1.27 of the Fylde Local Plan to 2032. This requires that Fylde Council undertakes a review whether full or partial if the Wyre Local Plan is adopted with unmet housing need. This has occurred (see below).
- 6.3 The Partial Review includes an update of Housing Needs. It is informed by a Local Housing Need assessment, calculated using the standard methodology in accordance with PPG, as specified in paragraph 60 of NPPF19. It also considers the implications of the PPG and the identified needs figure from the SHMA Fylde Addendum 3 and the recently-adopted Local Plan.
- 6.4 The adopted Fylde Local Plan to 2032 allocates sites for 8,819 homes within the plan period. This meets the needs that were identified in the Local Plan. The Partial Review of the Fylde Local Plan to 2032 identifies the Local Housing Need to be 275 dwellings per annum (based on the standard method), which results in a minimum housing need figure for the plan period (2011-2032) of 6,895. The Fylde Local Plan to 2032 provides allocations within Fylde that exceed this figure for the plan period. Therefore, the Fylde Local Plan to 2032 meets needs in Fylde identified in the Partial Review of the Fylde Local Plan to 2032.
- 6.5 The Partial Review of the Local Plan needs to take account of any need that cannot be met in neighbouring areas, in accordance with paragraphs 11, 60 and 65 of NPPF19. The Wyre Local Plan (2011-2031) was adopted with unmet need. However, it commits Wyre Council to bringing forward a Partial Review (see below), with the objective of meeting in full the Objectively Assessed Housing Needs in Wyre, and including a review of the local housing needs figure.

#### Wyre:

- 6.6 The Wyre Local Plan (2011-2031) paragraph 4.1.6 identifies the OAN for housing to be 479 net dwellings per annum, equating to 9,580 net dwellings over the plan period 2011-2031.

This was derived from the Fylde Coast SHMA (2014) and its Addenda, in particular Wyre Addendum 3: OAN Update (Turley, September 2017).

- 6.7 The Local Plan delivers 9,200 dwellings (Policy SP1) or 460 dwellings per annum within the plan period. Therefore, there is an unmet need of 380 net dwellings or 4% of the OAN. The Local Plan states in paragraph 10.4.2 that it includes sufficient land to meet identified needs in the first five years post adoption. Therefore, the unmet need of 380 dwellings against the OAN figure arises later in the plan period.
- 6.8 The Wyre Local Plan (2011-2031) Policy LPR1 commits Wyre Council to bringing forward a Partial Review with the objective of meeting the full Objectively Assessed Housing Needs. Therefore, there exists unmet need of 380 dwellings at the present time, and there exists a mechanism in the Wyre Local Plan (2011-2031) to seek to meet this need in accordance with the timetable set out in Policy LPR1.
- 6.9 The Partial Review will include an update of Housing Needs. It will be informed by a Local Housing Need assessment, as specified in paragraph 60 of NPPF19. It will also consider the implications of the PPG and the identified needs figure from the SHMA Wyre Addendum 3 and the recently-adopted Local Plan.
- 6.10 Policy LPR1 of the Wyre Local Plan (2011-2031) requires that Wyre Council undertake a partial review of the plan:

*The Local Planning Authority will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. This will commence before the end of 2019 with submission of the review for examination by early 2022. Specific matters to be addressed by the review include the following:*

- 1. An update of Objectively Assessed Housing Needs.*
- 2. A review of transport and highway issues taking into account:*
  - (i) housing commitments and updated housing needs;*
  - (ii) implemented and committed highway schemes;*
  - (iii) the scope for sustainably located sites where the use of sustainable transport modes can be maximised; and*
  - (iv) the additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs.*
- 3. Allocation of sites to meet the full Objectively Assessed Housing Needs taking into account 2. above.*

- 6.11 Wyre Local Plan (2011-2031) paragraph 10.4.2 states “The Council is committed to undertaking an early partial review of the Local Plan as soon as possible after adoption to address the shortfall against the identified housing OAN, in accordance with Policy LPR1 below.”

**Blackpool:**

- 6.12 The adopted Blackpool Local Plan Part 1: Core Strategy (2012 – 2027) identifies a housing need figure for Blackpool of 280 net dwellings per annum. This housing need figure was established by the Fylde Coast SHMA (2014) and its Addendum 1. Blackpool Council is not reviewing this figure as part of the preparation of the Blackpool Local Plan Part 2: Proposed Site Allocations and Development Management Policies. A calculation of what would be the minimum local housing need figure using the standard methodology in accordance with paragraph 60 of NPPF19 results in a lower figure of 114 dwellings per annum: therefore the Part 1: Core Strategy housing need figure does not require augmenting in consequence of NPPF19. The informal draft Blackpool Local Plan Part 2 proposed allocation of sites to accommodate sufficient dwellings to meet its identified needs within Blackpool. Blackpool Council has not requested assistance from neighbouring councils for the provision of sites to meet its housing needs.

**Matters of Disagreement**

- 6.13 Fylde Council states that the assessment of local housing need required to be conducted as part of the Partial Review of the Wyre Local Plan will need to have regard to the need for consistency in the calculation of housing need across the housing market area, in particular the use of the standard method in Fylde.

## 7. Strategic matters: housing requirements

### Matters of Agreement

#### Fylde:

- 7.1 The Fylde Local Plan to 2032 Policy H1 sets out a minimum net housing requirement of 415 homes per annum for the plan period 2011 to 2032, equating to 8,715 net homes for the period.
- 7.2 The Fylde Local Plan to 2032 was adopted on 22<sup>nd</sup> October 2018. Therefore, the strategic policy that sets out the housing requirement is less than 5 years old for the purpose of the assessment of five-year housing land supply as required by paragraph 73 of NPPF19.
- 7.3 The Partial Review includes a review of the housing requirement figure in the light of the updated minimum housing need figure above. The Partial Review will set a housing requirement figure of 275-415 dwellings per annum.

#### Wyre:

- 7.4 The Wyre Local Plan (2011-2031) Policy SP1 sets out that the plan will deliver a minimum of 9,200 dwellings.
- 7.5 The Wyre Local Plan (2011-2031) was adopted on 28<sup>th</sup> February 2019. Therefore, the strategic policy that sets out the housing requirement is less than 5 years old for the purpose of the assessment of five-year housing land supply as required by paragraph 73 of NPPF19.
- 7.6 It will be for Wyre Council to determine whether it reviews its housing requirement figure through the Partial Review, whilst following the requirements of the Local Plan Policy LPR1.

#### Blackpool:

- 7.7 The Blackpool Local Plan Part 1: Core Strategy Policy CS2 sets out Blackpool's housing requirement to build 4200 new homes between 2012 and 2027, equivalent to 280 net homes per annum.
- 7.8 The Blackpool Local Plan Part 1: Core Strategy was adopted on 20<sup>th</sup> January 2016. Therefore, the strategic policy that sets out the housing requirement is less than 5 years old for the purpose of the assessment of five-year housing land supply as required by paragraph 73 of NPPF19.
- 7.9 Blackpool Council is preparing a Blackpool Local Plan Part 2: Proposed Site Allocations and Development Management Policies document. An informal draft document for consultation was published in January 2019. The Local Plan Part 2 will not review the housing requirement from the Core Strategy. The informal draft Local Plan Part 2 set out the delivery of homes to date, existing commitments and allowances, from which it calculated a residual requirement of 820 dwellings, plus an allowance of 254 for slippage.

- 7.10 The annual housing requirement figure in the adopted Blackpool Local Plan Part 1: Core Strategy exceeds the local housing need figure that a calculation using the standard method in PPG produces. Therefore, in this respect, the Core Strategy housing requirement remains in compliance with the Framework.

### **Matters of Disagreement**

- 7.11 Fylde Council states that the revised housing requirement in the Partial Review of the Fylde Local Plan to 2032 allows account to be taken of any need from neighbouring authorities that cannot be met, up to the amount of unmet need from the adopted Wyre Local Plan (2011-2031), should any need that cannot be met exist following Wyre's Partial Review.

## 8. Record of engagement on key strategic matters

- 8.1 The Duty to Co-operate applies to all local planning authorities (LPAs), county councils in England and to a number of other 'prescribed' bodies requiring them to co-operate with each other to address strategic planning matters relevant to their areas in the preparation of a development plan document (DPD). The duty requires ongoing constructive and active engagement on the preparation of DPDs and other activities relating to the sustainable development and use of land.
- 8.2 The other Fylde Coast authorities i.e. Wyre Council (as a neighbouring authority) and Blackpool Council (as a neighbouring unitary authority), together with Lancashire County Council (as transport authority, highway authority, education authority, public health authority and as waste and minerals authority), are prescribed bodies with whom engagement is required under the Duty to Co-Operate. As explained in Section 5 above, the Fylde Coast authorities and Lancashire County Council, under the framework set out in the Memorandum of Understanding, hold regular quarterly meetings of officers under the Duty to Co-Operate. Matters discussed include the potential for joint evidence production, issues relating to housing, retail, gypsies and travellers, transport issues including strategic transport infrastructure, and the potential for more closely-aligned and joint plan-making. The outcomes of the engagement are demonstrated by the agreement to the content of this document by the signatories.
- 8.3 Fylde Council has also co-operated with the other prescribed bodies. These are:
- Preston City Council (as a neighbouring authority)
  - South Ribble Borough Council (as a neighbouring authority)
  - West Lancashire Borough Council (as a neighbouring authority)
  - Highways England
  - Environment Agency
  - Historic England
  - Natural England
  - Marine Management Organisation (the MMO)
  - Homes England
  - Fylde and Wyre Clinical Commissioning Group (CCG)
  - The National Health Service Commissioning Board (NHS England)
  - Civil Aviation Authority (CAA)
  - Lancashire Local Enterprise Partnership (including Transport for Lancashire)
  - The Office of Rail and Road
- 8.4 Each of the above bodies have been consulted on the scope of the Partial Review of the Fylde Local Plan to 2032. In addition, it is intended to consult them all on the draft of the Schedule of Revisions prior to the full publication for consultation, and to undertake engagement with consultees to resolve any issues arising. Given the limited extent of the proposed revisions, this level of engagement is considered proportionate and reflects ongoing co-operation.

## **9. Other strategic matters and how they will be addressed**

- 9.1 This Statement of Common Ground has been produced to support the Partial Review of the Fylde Local Plan to 2032. The Partial Review has a limited remit: this is defined by the proposed revisions to the Fylde Local Plan to 2032 contained within the Schedule of Revisions. The strategic matters considered by this statement are limited to those which have direct impact upon the policies and text which are proposed for revision by the Partial Review.
- 9.2 Strategic matters that are not being considered for revision in the Partial Review of the Fylde Local Plan for 2032 will be subject to one or more separate Statements of Common Ground that will inform preparation of the future full review of the Fylde Local Plan as prescribed by paragraph 33 of NPPF19.

## 10. The plan-making authorities and other signatories

### Plan-Making Authorities

The plan-making authorities that are signatories to this statement are as follows:

#### Fylde Council

Signed:

Dated:

(INSERT NAME AND POSITION)

#### Wyre Council

Signed:

Dated:

(INSERT NAME AND POSITION)

#### Blackpool Council

Signed:

Dated:

(INSERT NAME AND POSITION)



**Other signatories:**

(These just to be listed once agreement is received)

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**Partial Review of the Fylde Local Plan to 2032**

## **Statement of Regulation 20 Consultation**

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

**October 2020**



## Contents

<b>1</b>	<b>Introduction</b>	<b>5</b>
<b>2</b>	<b>Representations: summary data</b>	<b>6</b>
<b>3</b>	<b>Summary by Policy with Council Response</b>	<b>7</b>
<b>4</b>	<b>Summary Statement of Main Issues</b>	<b>61</b>

## Appendices

<b>1</b>	<b>Regulation 19 Consultation Materials</b>	<b>63</b>
<b>2</b>	<b>Pre-consultation response from Wyre Council</b>	<b>73</b>
<b>3</b>	<b>Fylde Council response to Wyre Council pre-consultation response</b>	<b>79</b>



# 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 <sup>th</sup> March 2020.	Noted. The 6 <sup>th</sup> March 2020 letter from Wyre Council, and Fylde Council's response to it of 24 <sup>th</sup> 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>

Respondent	Summary of comment	Council response
	<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.



Respondent	Summary of comment	Council response
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>



Respondent	Summary of comment	Council response
	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.

Respondent	Summary of comment	Council response
		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>

Respondent	Summary of comment	Council response
	<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"> <li>a) that needed for purposes of agriculture, horticulture or forestry;</li> <li>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;</li> <li>c) the re-use or rehabilitation of existing permanent and substantial buildings;</li> <li>d) extensions to existing dwellings and other buildings in accordance with Policy H7;</li> <li>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;</li> <li>f) isolated new homes in the countryside which meet the criteria set out in Policy H6;</li> <li>g) minor infill development;</li> <li>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.</li> </ul>	
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

Respondent	Summary of comment	Council response
	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>

Respondent	Summary of comment	Council response
	<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



Respondent	Summary of comment	Council response
	<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"> <li>• 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);</li> <li>• strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or,</li> <li>• an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.</li> </ul> <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>

Item 4 - Appendix 10

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 &amp; 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	

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>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>

Respondent	Summary of comment	Council response
	<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>



Respondent	Summary of comment	Council response
	<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>

Respondent	Summary of comment	Council response
	<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>

Respondent	Summary of comment	Council response
	<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	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.	Unallocated sites can be windfall development sites if compliant with the policies of the plan. The Partial Review does not seek to allocate sites.



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](mailto: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](mailto: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](mailto: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](mailto: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](mailto: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**  
23<sup>rd</sup> 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](mailto: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](mailto: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;
- 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.

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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](mailto: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](mailto:sally.thompson@fylde.gov.uk)

**Fylde Borough Council**

[www.fylde.gov.uk](http://www.fylde.gov.uk)

**Email Disclaimer**



## **Appendix 2 Pre-consultation response from Wyre Council**



Together we make a difference....

By Email Only:

[Julie.glaister@fylde.gov.uk](mailto:Julie.glaister@fylde.gov.uk); and  
[Eddie.graves@fylde.gov.uk](mailto:Eddie.graves@fylde.gov.uk)

**Ask for:** Steve Smith  
**Email:** [Steve.smith@wyre.gov.uk](mailto: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](mailto:Julie.glaister@fylde.gov.uk)

Date: 24<sup>th</sup> March 2020

Dear Steve

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

Thank you for your letter of 6<sup>th</sup> March 2020 which provides follow up to the earlier email exchanges, telephone conversations and proceedings at the Duty to Co-Operate meeting of 10<sup>th</sup> 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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You may re-use this document/publication (not including logos) free of charge in any format or medium. You must re-use it accurately and not in a misleading context. The material must be acknowledged as Fylde Borough Council copyright and you must give the title of the source document/publication.

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This document/publication is also available on our website at [www.fylde.gov.uk](http://www.fylde.gov.uk).

Any enquiries regarding this document/publication should be sent to us at the Town Hall, St Annes Road West, St Annes FY8 1LW, or to [listening@fylde.gov.uk](mailto:listening@fylde.gov.uk).

Date: October 2020

Review Date: N/A

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

## DECISION ITEM

REPORT OF	MEETING	DATE	ITEM NO
DEVELOPMENT SERVICES DIRECTORATE	PLANNING COMMITTEE	14 OCTOBER 2020	5
<b>WHITE PAPER – PLANNING FOR THE FUTURE 2020</b>			

### PUBLIC ITEM

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

#### SUMMARY

Planning for the Future, a White Paper was published for consultation by the Government on the 6<sup>th</sup> August 2020, the consultation runs for 12 weeks until 29<sup>th</sup> October 2020.

The Planning for the Future consultation proposes reform of the planning system to streamline and modernise the planning process, it aims to bring a new focus to design and sustainability, improving the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed

The purpose of this report is to summarise the main changes proposed by the Planning for the Future White Paper. A more detailed analysis of the Design and Quality Aspects of the White Paper is included at Appendix 1. Appendix 2 the Draft Response to the White paper is provided for discussion and agreement by members.

Officers will continue to work on the Council's response, until the 29<sup>th</sup> October 2020.

#### RECOMMENDATIONS

1. Members note the changes proposed by the Planning for the Future White Paper.
2. Members approve the issues for inclusion in the draft consultation response (Appendix 2).

#### SUMMARY OF PREVIOUS DECISIONS

No previous decisions have been made, an information item was presented to Planning Committee on the 16<sup>th</sup> September 2020.

CORPORATE PRIORITIES	
Spending your money in the most efficient way to achieve excellent services ( <b>Value for Money</b> )	✓
Delivering the services that customers expect of an excellent council ( <b>Clean and Green</b> )	✓
Working with all partners ( <b>Vibrant Economy</b> )	✓
To make sure Fylde continues to be one of the most desirable places to live ( <b>A Great Place to Live</b> )	✓
Promoting Fylde as a great destination to visit ( <b>A Great Place to Visit</b> )	✓

## REPORT

### Introduction

Planning for the Future, a White Paper was published on 6<sup>th</sup> August 2020. It proposes wholesale reform to the current planning system and is not a bolt on in the way that previous incremental changes to the planning system have been. Since it was published there has been a considerable amount of debate by many organisations and individuals about its content. It specifically states that it “has not comprehensively covered every aspect of the system, and the detail of the proposals will need further development pending the outcome of this consultation”. There are 84 pages of text but many of the most significant changes are not described in any detail.

It could involve ‘wiping the slate clean’ and building a new Local Plan system from scratch with new primary legislation. It should be noted that the initial proposals set out in the White Paper will change as a result of the consultation, nothing has yet been decided. Also, it is likely to take until the end of 2021 for any of the legislation to be finalised so nothing is going to happen immediately. The main body of this report attempts to summarise the most significant changes that are proposed in order to inform the Council’s response to the consultation which closes on the 29<sup>th</sup> October 2020.

Appendix 1 is a more detailed analysis of the design and quality aspects of the White Paper, it provides a more detailed analysis of the changes and how they would relate to current procedures in Fylde. The Council’s draft response is provided in the form of a letter at Appendix 2 to this report.

### Local Plan Proposals

1. Local Plans are the centre piece of the system which goes back to its roots with ‘Plans’ that are mainly about maps. The map will be the main focus and there will not be hundreds of pages of words. The Local Plan will be stripped right back to a map, a key and a small amount of text. The development management policies will be included in the National Planning Policy Framework (NPPF). At present each Local Planning Authority (LPA) writes its own set of development management policies, that will no longer be permitted. There will be one main map of the whole area and possibly a series of smaller maps for example for town centres. The entire Local Authority area will fall into one of three annotations, the word annotation seems to have replaced allocation. LPAs will be expected to plan for a 10 year period rather than the current 15 year period from adoption.
2. **Growth Areas** will be suitable for substantial development. The word substantial will be defined in the NPPF, there will be a Guidebook of definitions. Uses (different types of development) will be specified for different parts of these growth areas. The map will have a key and text will specify appropriate uses. Upon adoption the plan will grant outline planning permission for the different uses specified in each of the annotations for the Growth Area. These can be a wide variety of uses. The Growth Area annotation will provide a series of outline planning permissions. The Local Plan will therefore define the appropriate uses but the market will pick up what is taken forward and in what ways i.e. the phasing. It will be very flexible depending on the numbers of uses proposed in a particular Growth Area. The Local Plan will define parameters for consent eg height, density and scale. Detailed planning permission can be secured by a reformed reserved matters process, a local development order or a development consent order, these will refer to national and local design codes and pattern books (paragraph 14).
3. **Renewal Areas** which are suitable for development e.g. intensification on brownfield sites, will carry a statutory presumption in favour of the uses specified for these areas. This will be a strengthened statutory presumption, a raising of the bar, there would have to be a very good reason for refusal if the proposed use is shown as appropriate. To do something different from the proposed use shown on the plan will be very difficult. Permitted development will be set out in pattern books and will satisfy the presumption and design codes. If you have used the Pattern book you can proceed under permitted development this is referred to as ‘The Fast Track to Beauty’.
4. **Protected Areas**, these are areas protected because they are for example a National Park, an Area of Outstanding Natural Beauty, they have a Heritage designation or they are at risk of flooding. This category also includes countryside. It is not clear if any development will take place in these areas.

## **The Amount of Housing Development**

5. The areas of land that should be put into the three categories, growth, renewal or protection will be determined in two ways:
  - There will be a binding standard method housing figure set at the national level for each local planning authority, this will add up to a total of 300,000 dwellings nationally per annum.
  - The required number of dwellings will take into account the ability of the Local Planning Authority to accommodate them. Environmental constraints will be considered and the number adjusted accordingly at the national level. This is a significant change because the decision on how to balance the need for housing in an area against the environmental constraints of that area will be made at the national level. This debate will be removed from plan making.
6. The process that the Government will go through to make this decision is not set out anywhere and will presumably continue to be discussed. This is a radical proposal that will save a lot of time wasted and money spent in the past on trying to agree the housing number. Local Plans will have to provide a certain number of dwellings so there will be no need for a five year supply calculation. Every Local Plan will be reviewed every 5 years and there will be continuous assessment of how the Local Plan is performing in relation to housing delivery. Sites being prepared for substantial development should seek to include a variety of development types from different builders which allow more phases to come forward together, assisting delivery.
7. Design Codes and guides will be produced at the same time as the Local Plan (twin tracked). There will be one single test of sustainability against which the Local Plan is assessed. The tests of soundness will not exist. The single sustainability test will focus on the outcomes rather than the process. The current sustainability appraisal system is very focussed on the process. The Duty to Cooperate will be abolished as it doesn't work. The deliverability tests will be made easier to operate, in parallel there will more focus on infrastructure requirements.

## **Local Plan Production/Timetables**

8. There will be a statutory duty to produce Local Plans and they will have to be made within 2.5 years (30 months).
9. Six months will be dedicated to the 'Call for Sites'. This will be a 'Best in Class' exercise and will be the time for engagement with people/businesses and organisations. This stage will give the public and LPAs a decisive role in making plans. This will be followed by 12 months to draw up the Local Plan which will give more time to keep going back for more engagement. Then there is a 6 week period for submission for examination and consultation on the Local Plan.
10. In the past Local Plans had to be justified by large quantities of evidence which were very expensive and took a long time to produce. Instead of evidence the Local Plan will have to be accompanied by a statement of reasons (justification) for the Growth Areas, Renewal Areas and Protected Areas, produced by the LPA.
11. The 6 week period will be for people to make their comments (equivalent to the current Publication Stage). Respondents will be required to explain what should be changed and why it should be changed. This will be followed by a 9 month examination which will be led by a Planning Inspector. The Inspector will make binding changes to satisfy the sustainability test, they can use the LPAs reasons for the Growth, Renewal and Protection Areas provided at submission and also representors comments as sections in their report, which will simplify report writing. This is followed by 6 weeks for the LPA to finalise the Local Plan.
12. There are transitional provisions set out in the White Paper. As set out in the previous item on the Partial Review officers have sought legal counsel on the implications for the Partial Review and in the light of the advice it is recommend continuing with the submission of the Partial Review as planned to the Secretary of State for Examination.

## **Resources**

13. Effectively, the White Paper is proposing that Local Plans would grant outline planning permission. This means more resources would need to be directed to the early stages of plan making. One idea for plan making under the new system is that landowners/developers pay a fee to have their site included in the plan, instead of paying a fee for submitting the outline planning application.



## **Infrastructure Levy**

14. Section 106 agreements would no longer be used for developer contributions but could be used for other purposes. There will be a new system called 'The Infrastructure Levy'. This would be a tax charged on the final value of a scheme that came in above a certain threshold, levied at the point of occupation. The rates charged would be set nationally, the money would be spent locally with Councils given the freedom to decide how to spend the money. Affordable Housing could be provided 'in kind' as a way of paying the Infrastructure Levy.

## **Fast Track for Beauty/Building Beautiful**

15. There is a big focus on design in the proposed new system. This seems to be solely about Housing, which should look beautiful, be built to the right standards have access to open space etc. There will be national model design codes and local model design codes and guides which set standards nationally and locally. Local people will be given a role in setting standards via pattern books, these can be produced at the level of an individual street. There will be permitted development rights for pattern book developments, which will act as a big incentive for developers to follow them. The aim will be to build developments that will be protected in years to come, the 'Conservation Areas' of the future.
16. National Design Coding Guidance will be a key part of the new planning system other suggestions are that:
- Design Coding will also be determined locally;
  - Local Plans should specify design requirements for sites that would be mandatory once adopted;
  - Other guidance to assist achieve good design will be mandatory e.g. Manual For Streets which addresses highway and public realm design, aimed at creating more attractive places;
  - Community Engagement will be an essential part of the process;
  - A national body will be created to support the elevated importance of design quality and this could be shared with local authorities;
  - To fast track applications that comply with the design code for a site;
  - Enhanced design skill promotion for some local authorities where this is absent.
17. Appendix 1 Design and Quality Aspects of the White Paper provides more detail and concludes that in principle, the concept of locally derived design specifications – design coding - should be supported although, as the report concludes, the White Paper and the policy, as it develops, leaves much to be considered in respect of practical application.
18. As a result all of the proposals in the White Paper, it is likely there will be far fewer planning applications. Much less material will be required to be submitted with a planning application. There will be page limits for planning statements, more delegation and planning permission may be granted automatically if an application is not determined. There may also be a rebate of the planning application fee if an application is successful on appeal. There will also be a simplification of the Environmental Impact Process.
19. These are considered to be the main changes, other significant points are listed below:
- A digital first approach to modernises the planning process moving from a process based on documents to a process based on data. Local Plans for example will be visual and map based, standardised, based on the latest digital technology, and supported by a new standard template. Plus there will be digital tools to support a new civic engagement process for Local Plans and decision making;
  - Strengthened enforcement powers and sanctions;
  - Comprehensive resources and skills strategy for the planning sector to be developed to support the implementation of the reforms;
  - Neighbourhood Plans will be retained but there is no explanation of how these would work alongside the new style Local Plans, it simply states that their content should become more focussed to reflect the proposals for Local Plans.
  - Each Authority to have a chief officer for Design and Place Making;
  - A promise to make all new streets tree lined;



- NPPF to target areas of planning where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits;

### General Comments on the Approach.

20. There continues to be a disproportionate focus on housing numbers and there is very little information about other types of development. There is little mention of health and the contribution that well- designed development can make to health. The national population is ageing, and lifetime homes and homes designed to accommodate the elderly need to be provided in higher numbers. Climate change and flooding plus sustainable drainage systems (SUDs) do not feature prominently in the proposals, neither does biodiversity.
21. For Fylde Council it is vital to know how the Government will assess that a local authorities' environmental constraints should reduce its housing requirement. Also, how will the new system address the situation where a more urban authority than Fylde cannot accommodate its housing number, what will happen to that unmet need?
22. It is considered that the new system, as currently proposed, will be less democratic. The approval of new development will shift to the plan making stage, the traditional process of planning committees determining planning decisions with opportunities for the public to make representations will end.
23. The White Paper does suggest that people's right to be heard in person will be changed. It suggests that any 'right to be heard' might be removed (paragraph 2.53). The opportunity to appear at the Examination of the Local Plan may be replaced by an 'invitation only process' with the Inspector deciding who to invite. The White Paper proposes reducing both rights and opportunities to participate in planning decisions.
24. Appendix 2 is a draft letter of response to the consultation, officers will continue to work on the response until the deadline of 29<sup>th</sup> October 2020.

IMPLICATIONS	
Finance	There are no financial implications at this stage. It is unclear at present what implications there may be in the future, for example there may be less income from Planning Application fees, but there may also be additional income from charging for assessing proposals in relation to the new design codes/pattern books.
Legal	New legislation may be introduced at the end of 2021. New council procedures will be required.
Community Safety	None.
Human Rights and Equalities	There appears to be less opportunities for people to get involved in the planning system. The provision of affordable housing is unclear, there may be revised policy in the Planning Practice Guidance and funding via the Infrastructure Levy.
Sustainability and Environmental Impact	There will one single sustainability test. In the past sustainability considered social, environmental and economic impacts.
Health & Safety and Risk Management	The new system is already creating uncertainty, the Council will complete the Partial Review and the move onto reviewing the whole plan, the new system will be more refined by then.

LEAD AUTHOR	CONTACT DETAILS	DATE
Julie Glaister	Julie.glaister@fylde.gov.uk	14 <sup>th</sup> October 2020

BACKGROUND PAPERS		
Name of document	Date	Where available for inspection
Planning for the Future White Paper	6 <sup>th</sup> August 2020	<a href="https://www.gov.uk/government/consultations/planning-for-the-future">https://www.gov.uk/government/consultations/planning-for-the-future</a>

Attached Documents.

Appendix 1 – Design and Quality Aspects of the White Paper

Appendix 2 – Draft Responses to the White Paper

## DESIGN AND QUALITY ASPECTS OF THE WHITE PAPER

### Introduction and Key Issues

1. The White Paper suggests that planning decisions are largely of a discretionary nature, that is to say, subject to 'policy interpretation' rather than 'rules based'. Comparisons are made with Continental and American systems that are more prescriptive in their requirements, reflecting on how sites are physically developed. Land use zone ordinances and plot ratios are often used whereby the level of development on sites or the layout is set out by way of prescribed standards, for example, the height of buildings or the proportion of building on a site relative to its overall area. In the case of the present system, when considering planning applications, the National Policy Planning Framework, Planning Practice Guidance and Local Plans rely on an interpretation as to the meaning of policy, which is where the term 'discretionary' derives. In the case of local plans, policies relating to the criteria applicable to the development of sites might stipulate the development should be 'appropriate, in scale, character and have high quality landscape' for example. These policies require interpretation and discretion.
2. More recent national reports including the 'Building Better Building Beautiful Commission', the 'National Urban Design Guide' and 'Building for Healthy Lives' provide guidance and identify design principles that can act as a prompt for achieving high quality design. The National Design Guide, for example, lists 10 characteristics or principles that should be considered in various design scenarios and includes illustrative examples. The Guide should be used by planning authorities and developers to help inform development approaches to sites.
3. In Fylde, there is a long history of the Council seeking to achieve the highest quality of development possible by applying various design principles and seeking to negotiate good outcomes with developers and their agents. Relative success often depends on the intentions of the developer and their approaches to design in general. The very best schemes have often been achieved where the developer is supported by a good design team and is prepared to work collaboratively with council planning staff, who can pool their expertise. There are a number of notable examples of this way of working, but also situations where the outcome has been less than what might have been achieved. Developers are often reluctant to change standard approaches to design since to do so would not allow them to apply their standard format.
4. In response to the National Urban Design Guide, a Fylde Guide is in the process of being developed. This will reference the national guidance but is also seeking to produce a methodology or process for approaching design. This will provide a framework as a means of identifying key issues for sites, promoting informed discussion and dialogue with developers and their designers. In many ways it looks to establish a method of 'design coding', that forms part of the Governments proposals, and will be discussed later in this report.
5. The general view, as set out in the White Paper, is that there are some very good examples of successful urban design. Examples are shown by way of illustration. Equally there are many recent professional reports that have analysed typical design schemes – largely green field housing sites – that conclude, following rigorous analysis, that the design outcomes have been poor. The Government agree with this form of analysis and suggest that poor 'soulless' development can result in the public being hostile to development proposals as they come forward. Some of the examples that are illustrated in these documents are of a form of development that would not find favour in Fylde, although the overall quality achieved throughout the Borough does vary.

6. A key objective of creating high quality places is based around creating designs that are grounded in distinctive character, and have open spaces, ecological benefits and a healthy format including their layouts. To meet these objectives, a key aspect of achieving high quality development will be for local authorities to engage with the local community, to determine the values considered to be important and appropriate to an area. This occurs to some extent at the present time through the planning application process and in discussions with developers. Quality of design, where it occurs, is generally achieved through negotiation and agreement. Guidance is available to assist the process and other policies e.g. those contained within Neighbourhood Plans e.g. St. Anne's, also contains guidance material on design considered appropriate to the town.
7. 'Pillar 2' of the White Paper discusses at length the objectives of creating 'Beautiful Places', ensuring the location for development is appropriate, it includes sufficient open space, ecology, layout, development mix, landscaping, building form and characterful buildings. To achieve these outcomes, it is suggested that the local plan system would be the vehicle for setting out clear design expectations for sites and localities in a prescriptive 'rules based' format, by specifying the requirements for including master plans and design coding.
8. This would suggest that local authorities (and the communities they serve) should set out clear design expectations for their area and this would necessarily need to include new development sites as well as existing urban areas. Where sites have set out clear design requirements and these are quantified, then it is anticipated in the White Paper, that planning applications associated with the development of these sites would be 'fast tracked'.
9. In the case of Fylde, officers are engaged with the potential development of a range of sites and subsequent planning applications, where design principles can be or are set out early in the process. However, this form of engagement can result from an approach by a developer without any prior knowledge that a development proposal might be forthcoming. In other cases engagement takes place at a very early stage in the process which is, of course, the preferred method. Where development sites are known about or likely to come forward. 'design briefs' or design parameters are often set out along with the developer where precise design requirements are understood from the start of the process. Examples include St Anne's Aldi scheme, Booths at Heyhouses and Danbro of Lytham. The design parameters or codes/ are usually set by officers following a thorough study of the site and its surroundings.
10. In the case of green field sites, in some cases, applications have been fronted by developers who present a draft plan for discussion at the start of the process. The potential problem here is that the layouts and designs often presented are deemed by the developer to comply with policy e.g. open space, affordable housing, highway or ecology issues. However, the general layout is designed to a standard pattern, standard spacing, standard house types, car parking poorly located, form and elevation resulting in a mediocre design solution. Rarely have these schemes demonstrated a thorough understanding of the local context or the public expectations as regards the character of the development. It is therefore more difficult to achieve wholesale change once the initial designed layouts are presented, although this is sought where appropriate. Given the agenda of national government, to achieve significant levels of house building, there is often a lack of certainty that the refusal of schemes that present mediocre designs would be supported on appeal. The idea of master planning and design coding would provide assurances that high quality, locally distinctive design would be supported and would have to be implemented once adopted in local plans.

11. In previous circumstances, where allocations had been brought forward, though the local planning process, without planning applications being presented ahead of the plan being adopted – design briefs have been produced for sites. These in effect were a form of design code that stipulated key parameters for the development of the site in question. The Briefs varied in scope ranging from those at a ‘high-level’ which stipulated generalised layout and open space requirement considerations through to much more detailed specifications, for example elevational requirements for buildings, landscaping or material selection. Historic examples include. St Georges Park, Cypress Point, Ribby Hall and Queen Mary School.

### **In Principle Ideas of the White Paper with respect to Design**

The White Paper discusses this issue at length but some of the key messages are:

- 12 . National Design Coding Guidance will be produced. Some of the suggestions are that:
  - Design Coding will be determined locally
  - Local Plans should specify design requirements for sites that would be mandatory once adopted
  - Other guidance to assist achieve good design will be mandatory e.g. Manual For streets which addresses highway and public realm design, aimed at creating more attractive places
  - Community Engagement will be an essential part of the process
  - A national body will be created to support the elevated importance of design quality and this could be shared with local authorities.
  - To fast track applications that comply with the design code for a site
  - Enhanced design skill promotion for some local authorities where this is absent

### **Design Coding**

13. In essence, design codes would set out requirements for sites that are aimed at directing the design outcome. These are suggested to be ‘prescriptive’ rather than ‘discretionary’. The idea follows some of the systems employed in other countries. However, to achieve high quality development that would be ‘distinctive, functional and characterful’, it would be vital that the specifications within the site code would need to be as detailed as possible to achieve the desired outcome.
14. It follows that some of the codes would need to be operational that is; setting out key aspects of site development including open space, strategic landscaping, the block layout, ecology, road system, spacing standards of buildings etc. These would-be high-level codes. At the other end of the spectrum the form of buildings, influenced by their internal layout may need to be specified to give a certain shape and character. Codes covering specifications of height, roof profile, window openings – and so on – might be required in certain cases. This may sound complex but is exactly what occurs at present to varying degrees, depending on the sensitivity of the site: the only difference being that the parameters might be site specific. It may also be useful to work with developers to adjust standard plans floor plans that could be used over a particular site.
15. The idea of design coding seeks to ensure development is characterful and appropriate to the locality, whether it be urban or rural and may change from place to place. The biggest challenge will potentially be within green field sites.
16. The Design Guide being prepared at the present time for the Borough seeks to address design coding and would include a methodology as to how this might be achieved in the case of green field sites, but also in the context of existing urban areas.

17. This is clearly a potentially difficult area of planning policy and practice but has advantages as well as some drawbacks that might be expected.

#### **Positive Aspects of Design Proposals in the White Paper**

- Gives primacy to the local plan process in setting out precise design requirements and expectations for existing urban areas and for new sites
- Provides the opportunity to identify the appropriate development outcome for particular sites following a full consideration of all of the issues – resulting in design briefs and design codes
- Provide certainty for communities and the Council.
- Encourages early engagement with developers and their professional designers
- Relate design quality – and how to achieve it – with other important issues including the requirement for certain sites to achieve particular densities
- Would apply to all types of development
- Would help provide a framework for establishing ‘design areas’ across the existing urban – and rural areas
- Achieve fuller understanding of distinctiveness and how this can be reflected in development character
- Embracing good quality design through the engagement of other influences e.g. highway standards
- Potential fast tracking of applications in view of certainty
- Establish a national body to support the development of design coding including local (regional) support
- Better resourcing for local authorities
- Establish a key officer for design and a design champion within the authority

#### **Potential issues which require further consideration include:**

- The local plan process and its potential impact on design could be less effective if ‘hostile’ planning applications are made related to factors such as land supply issues.
- In such a case as that above, it would need to be a requirement that developers engage with local planning authorities to establish what parameters might be appropriate. This could lead to disagreement and so the issue might lead to an adversarial situation with an issue of arbitration being a particular problem
- The potential difficulty with defining the level of prescription and detailing for sites
- Would the design codes for a particular site be subject to challenge and if so, what would be the process?
- The need for developer recognition that standard design solutions may well not be appropriate, and this could affect their incentive to develop in certain locations
- The issue of public engagement is potentially difficult i.e. identifying what level this might take place and what the process might be
- Extensive public engagement could be time consuming and controversial
- The assumption that design code complicit development would be ‘fast tracked’. This could mean that extensive design studies would be required for localities (which can be done and has been trialled in the development of the local listing project) such that requirements for

specific sites can be ascribed design coding or design requirements. The Local Design Guide that is currently being prepared would assist with this.

- National Support and resourcing would be a key issue and how this would permeate to a local level
- Ensuring sufficient trained staff are able to take the process forward

The proposals within the White Paper as regards the desire to see more attractive, high quality developments and places is fully endorsed. The idea of design briefs, parameter plans, and design coding are not new. Various schemes throughout the Borough have in effect taken this approach, particularly in the case of sensitive sites in existing urban areas. In general, developers apply elements of design codes to sites, but these are largely 'standards' that are generally deemed to be necessities. Examples would be the spacing of dwellings on sites, highway requirements and car parking. However, the application of these types of parameter do not equate of themselves, with attractive, characterful development.

Despite Government pronouncements through the NPPF, for example, this can be more difficult to achieve.

Much of what has been achieved locally as been the result of high-level negotiation. In principle, the concept of locally derived design specifications – design coding - is to be supported although, as the report concludes, the White Paper and the policy, as it develops, leaves much to be considered in respect of practical application, as outlined.

Paul Drinnan September 2020



Planning for the Future Consultation  
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Your Ref:

Please Ask For: Mark Evans

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Date:

Dear Sir,

#### **Re: Planning for the Future – White Paper**

Planning for the Future proposes some radical changes to the current system, unfortunately little detail is provided with the White Paper stating specifically that it “has not comprehensively covered every aspect of the system, and the detail of the proposals will need further development pending the outcome of this consultation”.

Fylde Council is extremely concerned that it, along with other key stakeholders, is being asked to comment on major changes to a well-established planning system without the necessary detail to allow an assessment of the potential impacts of the proposed changes. Accordingly it is considered essential that there should be a further consultation and engagement on the more detailed version of the proposals that results from this consultation. This would allow better informed input into the new proposals, by Local Planning Authorities (LPA).

#### **General Comments**

Changes proposed in the White Paper seem to be focussed on a limited number of areas, for example there is the usual focus on housing numbers, the other main focus is beauty of housing development.

Over recent years, there have been numerous references to “fixing the country’s broken planning system”. The illustrations provided within the consultation document itself clearly illustrate the quality of development that the current system is able to deliver. Each of these developments will have been the subject of extensive discussions between the developer, the local community and the local planning authority. The reference to the system being broken appears, therefore, to be principally directed at the failure to deliver the number of new homes required across the country. However, it is clear from the significant number of residential planning permissions that have not been implemented that there are also challenges to the delivery of new homes that lie outside the influence of the current planning system. Unless these challenges are addressed as part of a



comprehensive review of the overall development process, it is doubtful whether the revisions currently proposed will address the primary issue.

Whilst the delivery of sufficient housing to meet the needs of the nation is clearly a 'key issue', it is equally as important to deliver the right type of housing to meet the needs of a particular area. With LPAs no longer required to collect evidence about the needs of their area how will the housing delivered be tailored to meet the local needs?

There are no actual proposals to maximise the positive benefits that new development can have for health and no mention of the ageing population which is increasing the need for specialist housing and lifetime homes. Climate change, achieving carbon neutral homes (but only by 2025), biodiversity net gain and sustainable methods of transport are briefly mentioned, a lot more detail is needed.

The new system, as proposed will be less democratic. The approval of new development will shift to the plan making stage, the traditional process of planning committees determining planning decisions with opportunities for the public to make representations will end. The White Paper does suggest that people's right to be heard in person will be changed. It suggests that any 'right to be heard' might be removed (paragraph 2.53). The opportunity to appear at the Examination of the Local Plan may be replaced by an 'invitation only process' with the Inspector deciding who to invite. The White Paper does propose reducing both rights and opportunities to participate in planning decisions. The White Paper has not been widely publicised and most members of the public will not appreciate that this change is being proposed and will not therefore have commented on it.

Fylde Council objects to the loss of its widely understood and appreciated role in facilitating peoples' rights to participate in the planning process.

Whilst it may be considered that a zoning based approach to land use planning may provide greater certainty, it is considered that the operation of a system of the nature set out in the white paper will remove the flexibility of the existing system to respond positively to unexpected issues or unique opportunities.

### **Local Plan Production**

The idea of three categories of areas is clear and simple however it may be difficult to define the boundaries of such areas, there may be a transition zone. What happens in or to land that doesn't fall neatly in to one of the categories? For example, development next to a conservation area may have impacts on the conservation area itself.

The one single sustainability test appears to be a reduction in the sustainability testing process. Sustainability Testing was always a worthwhile independent assessment of the LPAs work which yielded valuable comments and changes, alternative arrangements should be put in place and they should be independent of the LPA.

The timescales for plan reduction are very short. LPAs have to write the justification for the Growth Areas, Renewal Areas and Protection areas with no evidence to back up their proposals. The amounts of land dedicated to each area are dictated by the housing number. However, a Local Plan is about much more than numbers of dwellings. For example, a Local Plan provides employment land, it safeguards proposed transport routes, identifies sites for schools and sports facilities and provides sites for gypsies and travellers. For each of these issues the LPA currently collects evidence

which highlights, for example, what types of employment sites are needed and where. The new system does not allow for the collection of this evidence and its analysis. How will these individual issues be dealt with under the new system? If an issue is highlighted by the evidence the LPA will not be able to include a policy in its Local Plan to address it.

The latter stages of plan production are also very short, Publication and Submission are combined into one stage. It is likely that this stage will generate large numbers of responses, the Council often receives thousands of responses to a consultation which it is then legally bound to present to the Planning Inspectorate broken down by policy order. This often takes months rather than weeks to compile. The obligations placed on LPAs would have to be changed in order for these timeframes to be met. The White Paper states there will be sanctions if Local Plans are not produced in 30 months, what are these sanctions? LPAs Planning Policy departments will need a considerable increase in resources if they are going to meet these deadlines.

The White Paper states that Design Codes can be produced as Supplementary Planning Documents (SPDs) but it does not clarify what role SPDs will have under the new system. In the past the Council has found SPDs an efficient way of dealing with unforeseen issues that arise locally. LPAs need SPDs as a flexible tool for responding to issues more quickly than a Local Plan.

### **The Housing Number**

It is unclear from the White Paper whether the proposed standard method will be that which is being consulted on through the parallel “current system” consultation, or whether it is something else. The consultation states that the number would be binding but then that the housing requirement would be reduced in LPA areas affected by constraints. The provision of a closed list of such constraints would be helpful in understanding how this would work.

If the total distribution of binding housing requirements provides for 300,000 new homes per annum, but in certain places is subject to reduction for constraints, the number delivered nationally will not be 300,000. Is it intended that areas without constraints will have elevated binding requirements to allow for this, and if so, how will this be calculated?

The proposal for authorities to “agree an alternative distribution of their requirement in the context of joint planning arrangements” fails to explain how this would or could be achieved other than through mayoral direction, and in the absence of clarity could result in disputes between authorities and challenge to plans as happens at present. In particular, would it be a requirement of the new system to enter into such arrangements, and if so in what circumstances?

### **The Infrastructure Levy**

It is unclear how affordable housing will be delivered via the Infrastructure levy. Rates will be set nationally however, the viability of development varies within a Local Authority area, as well as between Local Authorities with reduced viability in the North. If the Infrastructure Levy is set too high nationally it will reduce the viability of development, affecting the deliverability of affordable housing. Affordable housing may not be delivered at all in areas with low viability and this is the areas where it will be most needed. Allowing affordable housing contributions to be made in kind will also undermine the delivery of inclusive communities comprised of a mixture of tenures.

### **Design and Quality Aspects**

The proposals within the White Paper as regards the desire to see more attractive, high quality developments and places is fully endorsed by the Council. The idea of design briefs, parameter plans, and design coding are not new. Various schemes throughout the Borough have in effect taken this approach, particularly in the case of sensitive sites in existing urban areas. In general, developers apply elements of design codes to sites, but these are largely 'standards' that are generally deemed to be necessities. Examples would be the spacing of dwellings on sites, highway requirements and car parking. However, the application of these types of parameter do not equate of themselves, with attractive, characterful development.

Despite Government pronouncements through the NPPF, for example, this can be more difficult to achieve.

Much of what has been achieved locally has been the result of high-level negotiation. In principle, the concept of locally derived design specifications – design coding - is to be supported although, as the report concludes, the White Paper and the policy, as it develops, leaves much to be considered in respect of practical application, as outlined in the points below.

#### **Potential issues which require further consideration include:**

- The local plan process and its potential impact on design could be less effective if 'hostile' planning applications are made related to factors such as land supply issues;
- In such a case as that above, it would need to be a requirement that developers engage with local planning authorities to establish what parameters might be appropriate. This could lead to disagreement and so the issue might lead to an adversarial situation with an issue of arbitration being a particular problem;
- The potential difficulty with defining the level of prescription and detailing for sites;
- Would the design codes for a particular site be subject to challenge and if so, what would be the process?
- The need for developer recognition that standard design solutions may well not be appropriate, and this could affect their incentive to develop in certain locations;
- The issue of public engagement is potentially difficult i.e. identifying what level this might take place and what the process might be;
- Extensive public engagement could be time consuming and controversial;
- There is an assumption that design code complicit development would be 'fast tracked'. This could mean that extensive design studies would be required for localities (which can be done and has been trialled in the development of the local listing project in Fylde) such that requirements for specific sites can be ascribed design coding or design requirements. The Local Design Guide that is currently being prepared would assist with this;
- National Support and resourcing would be a key issue and how this would permeate to a local level;
- Ensuring sufficient trained staff are able to take the process forward.

In conclusion, it is considered that there is insufficient detail to allow the proposed changes to be assessed at this time. From the information currently available, the proposed changes to the planning system are focused too tightly upon the need to deliver new homes in sufficient quantity to meet the assumed need and neglect the consideration of the wider issues that the planning system

addresses. It is also considered that the proposals set out in the white paper, will produce a rigid system of planning that is required to adhere to predetermined plans and standards and will not provide the flexibility of the current system that allows it to respond to unusual or exceptional circumstances.

I hope the above comments will assist in refining the proposals for reforming the planning system and Fylde Council looks forward to further consultation on the next version of the proposals.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Mark Evans', with a long horizontal stroke extending to the right.

**Mark Evans**  
**Head of Planning Housing and Housing**