



Partial Review of the Fylde Local Plan to 2032

Summary of Responses to the Regulation 18 Consultation

Consultation between 25 April and 6 June 2019

Introduction

The Council considered that it was necessary to undertake a Partial Review of the plan for two reasons:

First, the Fylde Local Plan to 2032 (FLP32) was adopted on 22nd October 2018. It was examined in accordance with the National Planning Policy Framework 2012 (NPPF12). NPPF19 which was published in February 2019, Annex 1: Implementation. Paragraph 212 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. Fylde Council is proposing to carry out a partial review.

Second, Paragraph 1.27 of the Fylde Local Plan to 2032 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.

For the purpose of the Regulation 18 consultation the process followed was called a Partial Revision, as referred to in paragraph 212 of NPPF19. The Planning Advisory Service (PAS) have clarified that the process should be called a Partial Review rather than a Partial Revision and this is confirmed by the FLP32 paragraph 1.27 which states that Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial). The Council has also taken legal advice on this matter which confirmed that the process should be called a Partial Review. The review is the process by which the Plan is considered against any relevant changes in national policy. The revisions are the changes that are needed to ensure that the FLP32 remains up to date. Therefore, in the Council's Local Development Scheme the Development Plan Document is called a Partial Review of the Fylde Local Plan to 2032.

As part of this consultation, 35 representations were received from a variety of representors.

This document contains summaries of the representations received, along with the Council's responses to these representations.

Consultee	Key text from representation	Changes sought	Council Response
General			
Wyre Council	No comments to make	N/A	N/A
Equality and Human Rights Commission (EHRC)	No comments to make	N/A	N/A
Network Rail	No comments to make	N/A	N/A
Health and Safety Executive (HSE)	No comments to make	N/A	N/A
Homes England	No comments to make	N/A	N/A
Highways England	<p><u>General comment:</u> The Localism Act 2011 placed the responsibility of 'Duty to Cooperate' on local authorities to ensure that any local or cross boundary impacts have been fully considered and addressed appropriately in preparing the Local Plan. Fylde Council must demonstrate that they have discussed such matters with the relevant bodies, including Highways England.</p>	Demonstrate a Duty to Cooperate	The Council intends to engage directly with all bodies with which it has a Duty to Co-Operate once the purpose and proposed remit of the partial review is determined, prior to the finalisation of the Schedule of Revisions.
Indigo Planning on	<p><u>General comment:</u> ...it would have been helpful as part of this scoping consultation if Fylde Council had</p>	Publish a review of the	The Regulation 18 consultation is an invitation to representors to provide their own comments on what they feel should be

<p>behalf of Greenhurst Investments Ltd.</p>	<p>published a review of the degree of consistency of its local plan policies with the 2019 NPPF and accordingly the weight that should be attached to those policies. It should have also reviewed the 2019 NPPF for any new requirements that need to be met through the insertion of new policies.</p> <p>Therefore, we request that the Council undertake review of the policies contained within the Fylde Local Plan to 2032 (in terms of their consistency and weight in light of the 2019 NPPF), together with a consideration of whether any new policies are required, and publish it in due course for public consultation.</p>	<p>policies in the Local Plan together with any new policies a partial review might require for public consultation.</p>	<p>included in the partial review. This representor has not made any such suggestions but the confirmation that the Council should undertake the review exercise is welcomed. The full assessment will be provided at Regulation 19 stage, for public consultation.</p>
<p>Gladman Developments</p>	<p><u>General Comment:</u> in addition to the main topics identified by the Council, it may be prudent to consider how other elements of the Council’s recently adopted Local Plan are performing, and whether they should fall within the scope of the partial review process. These could include the progress in bringing forward and implementing the Council’s adopted housing allocations, or whether the authority’s policies are being applied efficiently and effectively, and whether they need amending.</p>	<p>Consider how other elements of the Fylde Local Plan are performing.</p>	<p>The Council have published an Authority Monitoring Report 2019, which monitors the implementation and effectiveness of the policies in the Fylde Local Plan to 2032. If policies are not performing as expected then this will trigger a contingency.</p>
<p>Turley on behalf of Strategic Land Group (SLG)</p>	<p><u>General Comment:</u> ..However, the information provided on which to comment is rather sparse and this limits the degree of the comments that can be made.</p>	<p>N/A</p>	<p>The information provided ensured that consultees were aware of the purpose of the consultation and did not limit their responses. Some respondents have made extensive comments.</p>

			The Regulation 18 consultation is an invitation to representors to provide their own comments on what they feel should be included in the partial review.
Sport England	<p><u>General Comment:</u> Whilst the NPPF does not stipulate precisely how policies for sport should be presented in Local Plans, Sport England, following the NPPF, consider that as an absolute minimum, policy should cover the following issues:</p> <ul style="list-style-type: none"> • Facility Protection - Policy needs to clearly state that sports facilities (built as well as pitches, open space and recreational land) will be protected from loss except where it is demonstrated that the site is surplus to requirements; or equivalent or better facilities will be provided; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. • Criteria to the policy could also include reference to opportunities for the shared use of facilities, and securing increased quantity and quality of provision in line with a robust and up-to-date assessment of need. Sport England's Playing Fields Policy and exceptions tests could be helpful in developing policy. • Enhanced and New Provision - Policy should identify the beneficial role that sport and recreation plays in existing and new 	<p>Ensure the policy issues provided are covered.</p> <p>Inclusion of the Active Design Principles within the Local Plan.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that 'plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests policy changes which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>However, a number of these elements have been recognised in the Fylde Healthy Living Supplementary Planning Document (SPD), which was adopted by the Council on the 11th September. The SPD also points developers to the 10 Active Design Principles published by Sport England and Public Health England.</p>

	<p>development through the provision of new and enhanced formal sports facilities (including built facilities) and open space used for active recreation. Specific requirements for meeting the needs of new residents should be addressed, along with opportunities to overcome existing deficiencies.</p> <ul style="list-style-type: none">• Sports Lighting - By extending the hours a facility is available, along with improving its viability, the lighting of outdoor sports facilities can provide enhanced opportunities for people to participate in sport and secure the benefits that sports can provide, especially in terms of health and well-being. Planning policies should recognise the benefits of lighting outdoor sports facilities along with the significant advances in such technology over recent years. Technical guidance in sports lighting which will help with the preparation of policy is available within the Design and Cost Guidance pages of the Sport England website.• Sport in the Green Belt, Urban Fringe and Open Countryside - Where relevant, sport should be referenced in policies covering the Green Belt, urban fringe and wider countryside, recognising the need to plan positively to provide opportunities for facility development in these areas and recognising		
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	<p>sport's role as a complementary land use, for example in green infrastructure provision.</p> <p>..... Sport England supports promoting active lifestyles, through our own advice, produced in partnership with Public Health England it promotes 'Active Design' along the 10 principles, (as explained earlier in this representation) developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles. We ask that you consider if this can be included in policies where relevant, although we would welcome a separate policy solely for active design. A model policy is contained on page 53 of our Active Design Guidance, along with several examples of good practice.</p>		
<p>United Utilities</p>	<p>It is understood that revisions to allocations will not fall within the scope of this partial revision and will not be taken forward as this would entail the production of a new Local Plan which is not necessary as the Local Plan is recently adopted. Our comments are made on this basis, avoiding comments relating to the water and wastewater considerations of specific sites. If the scope of the partial revision changes at all, please contact us as we would like to revise our response to you.</p>	<p>N/A</p>	<p>Comment noted.</p>
<p>Local Plan Policy Specific</p>			

<p>Smith and Love Planning</p>	<p>The following policies are key considerations when determining applications for changes of use of the employment sites listed under policy EC1. The policies at present do not comply with the NPPF which requires a more flexible approach and the wording of the policies should therefore be revised through the Partial Review in light of this.</p> <p>Policy EC1 (Overall Provision of Employment Land and Existing Employment Sites)</p> <p>The NPPF does not define employment uses whereas Policy EC1 restricts the use of employment sites to specific use classes.</p> <p>Policy GD8 (Demonstrating Viability)</p> <p>Policy GD8 states that proposals for changes of use on sites listed under Policy EC1 must meet one of the tests listed below.</p> <ul style="list-style-type: none"> • The existing use is no longer viable. In such cases applicants must demonstrate that there is no prospect of a mixed use development for the existing use and a compatible use coming forward; • The site is no longer suitable for the existing use; or • That marketing indicates that there is no demand for the existing use. 	<p>Alterations to policies EC1, GD8 and GD7.</p>	<p>The substantive content of the relevant paragraphs of NPPF19 has not changed from that of NPPF12, and therefore no change is needed to this element of policy.</p>
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	<p>A significant amount of evidence is required under Policy GD8 to demonstrate that there is no demand for the existing use as follows:</p> <ul style="list-style-type: none">• Evidence that marketing has been undertaken by an agent or surveyor at a price which reflects the current market or rental value of the land / premises for its current use and that no reasonable offer has been refused.• Evidence that the site has been marketed for an appropriate period of time, which will usually be 12 months or 6 months for retail premises.• Evidence that the site has been frequently advertised and targeted at the appropriate audience. The policy lists what it considers is appropriate marketing. <p>Policy GD8 does not accord with paragraph 81c (<i>sic.</i>) of the 2019 NPPF which states that planning policies should “<i>be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.</i>” There is also conflict</p>		<p>This quote is taken from paragraph 81d) of NPPF19 which replicates the second part of bullet 3 of paragraph 21 of NPPF12, whilst adding the new clause regarding new and flexible working practices in the middle. This does not undermine Policy GD8: there is no conflict, and no change is required.</p>
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	<p>between Policy GD8 and paragraph 121 of the NPPF which states that:</p> <p><i>“Local planning authorities should take a positive approach to the applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:</i></p> <p><i>a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine the key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework;...”</i></p> <p>The requirement for 12 months of marketing information, and the amount of evidence required, is excessive and can lead to significant delays in delivering alternative appropriate uses. Responding to economic changes rapidly means allowing alternative uses on sites which have not come forward for employment or where there is no demand for such uses quickly. This is even more important where there is a shortage of land for housing. The Policy should therefore be amended accordingly.</p> <p>Policy GD7, criterion T states that <i>“development should not prejudice or prevent the operation of existing land uses”</i>. This policy also requires revision as any application to develop an employment site for an alternative use will prevent the operation of the existing land use (which is being replaced). Perhaps</p>		<p>Identified development needs are met through the Local Plan as adopted. There is no need for the waiving of the requirements of Policy GD8 in order to meet development needs, as the Local Plan has been found sound with the policy in place and identified development needs met in any case. Therefore there is no conflict between Policy GD8 and paragraph 121 of NPPF19. No change is required to the plan.</p> <p>The issue of alternative uses is not a new subject for consideration as a result of NPPF19 but is a basic issue dealt</p>
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	on “neighbouring land” would be more appropriate than “existing land”.		with by the planning system. The policy was found sound; no change is needed to the plan.
Treales Roseacre and Wharles Parish Council	<p>The parish council of Treales Roseacre and Wharles requests that the Fylde Local Plan is updated in relation to its Policy ENV3. We would like to request that all the undeveloped land adjacent to the roadside areas of Carr Lane, Kirkham Road and Treales Road within its Parish are re-designated with ENV3 open spaces status.</p> <p>This request is made in order to protect the character of this unique but critically threatened area of Treales.</p> <p>The parish council feel ENV3 status is necessary and crucial as the existing protection within the local plan and planning policies has not been sufficient to protect Treales from unsustainable and inappropriate development that has severely damaged the character and heritage of the area.</p>	Re-designate all undeveloped land adjacent to the roadside areas of Carr Lane, Kirkham Road and Treales Road with ENV3 open space status.	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests policy changes which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>However, this issue has the potential to be considered within a neighbourhood plan.</p>
Transport			
Highways England	...Regardless of how any increase in housing numbers within Fylde Borough may be achieved, Highways England requires that associated proposal emerging from the Local Plan review must be	Any proposal emerging from the partial review must be	The response provided by Highways England misinterprets the effect of the proposed remit of the partial review. It is not intended to increase the housing requirement in the borough as a result of the partial review exercise, and therefore the

	<p>developed and tested on the basis of a robust transport assessment that identifies the potential traffic impacts upon the SRN and how the associated transport growth and impacts on air quality are to be managed.</p> <p>....Our expectation is that an updated transport evidence base should also be developed in accordance with the Ministry of Housing, Communities and Local Government’s guidance entitled ‘Transport evidence bases in plan making and decision taking’.</p> <p>Given the desire to increase housing numbers between the two authority areas [Fylde and Wyre], a section of the SRN requiring assessment will be the A5A5(T) and Junction 3 of the M55. This is because the A585 route (both north and south of Junction 3) lies mainly within Fylde, but serves traffic from both the Fylde and Wyre districts. We note that during the development of the Wyre Local Plan, Highways England supported a detailed level of traffic modelling work that established a benchmark for how M55 Junction 3 and junctions on the A585 trunk road would perform with Local Plan growth added for a series of future year scenarios.</p> <p>Due to the linkages between the two authority areas, Fylde Council was also involved with this work as part of the development of the new Fylde Local Plan – this included a further scenario to test the impact of both Fylde and Wyre Local Plan growth at M55 junction 3</p>	<p>developed on the basis of a robust transport assessment.</p>	<p>additional assessments that Highways England considers necessary should not be needed.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The Council will engage further with Highways England as necessary, working through the Duty to Co-Operate, to ensure that an agreed position is reached.</p>
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	<p>and the A585 to Windy Harbour, and formed part of Fylde Council’s transport evidence base. In addition to this, we would also expect to see Junction 4 of the M55 reviewed; the original assessment having being undertaken by Lancashire County Council.</p> <p>For consistency, Highways England believes that the transport evidence base work required for the partial review should be based upon this previous work, so that it acts as a benchmark for assessing the traffic impacts of any growth in housing numbers above the current Local Plan.</p> <p>Highways England welcomes the opportunity to work positively with Fylde Council as part of this process, and to assist in the provision of information where we can, but believe that appropriate expertise should be commissioned by Fylde Council to complete the updated transport assessment work.</p> <p>We would welcome further detail on the options being considered by Fylde Council as the review is carried out, to ensure any additional growth is appropriately considered and accounted for, and that any sustainable transport interventions to support this growth are identified as part of the decision making process. It is worth reiterating that capacity enhancements and the local plan stage, and not at the planning application stage.</p> <p>Finally, we would like to draw the Council’s attention to Highways England’s ‘The strategic road network: Planning for the future – A guide to working with</p>		
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	<p>Highways England on planning matters’. This document, which is publically available online, describes the approach we take to engaging with the planning system. The ‘Plan Making’ section of the paper sets out what we will be looking for as the Plan develops and within future consultation stages. In this respect, we would encourage the Council to consider paragraphs:</p> <ul style="list-style-type: none"> • 67 and 68 in terms of developing its evidence base; • 69 to 71 when considering which spatial development option (i.e. Growth Option) to pursue; and, 72 to 73 when proposing site allocations. 		
Trams to Lytham	<p>During previous Local Plan consultation phases, it was deemed necessary by the Council that clarification should be given on the policy regarding the improvement of the South Fylde Line. Additional text was added to specify that this policy may involve the creation of a ‘passing loop’ to increase the frequency of railway services.</p> <p>However, no further clarification was given on the ambition to “create a bus/rail/tram interchange on the South Fylde Line”, despite this policy potentially being in conflict with the passing loop proposal. As identified in Trams to Lytham’s recently published document, <i>Extension of the Blackpool Tramway to</i></p>	Clarification to the points set out in the response.	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests</p>

	<p><i>South Fylde- Outline Report</i>, the proposal set out in the local plan would be extremely beneficial to the Fylde area and the wider region. I have met Fylde MP Mark Menzies and representatives of Blackpool Transport, Blackpool Council and Lancashire County Council to discuss this matter, and there is generally a strong will to pursue this goal provided that a clear path can be identified, as well as very strong public support demonstrated by a recent petition.</p> <p>Provided it is within the scope of the consultation, Trams to Lytham and the Light Rail Transit Association would like to see clarity given some of, if not all, of the following points:</p> <ul style="list-style-type: none"> • How the passing loop and light rail proposals may interact with each other so that neither is compromised. • How light rail along the South Fylde Line may be achieved, in terms of layouts and routing. • What the next steps to achieving this goal could be, such as consultation, feasibility, the role of other local authorities and parties, and funding sources. • A potential target year for completion within the Local Plan period. 		<p>clarification about the South Fylde Line which falls outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p>
Kath Fenton	...I and other residents are extremely concerned about the transport and highways issues we already	N/A	In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined

	<p>face.....It seems to me the majority of new Great Eccleston residents use our village as a short cut to the A585 and therefore making it even more difficult to cross or access the main road when leaving the village I daily see people dicing with death trying to cross towards Singleton due to the vast volume of traffic on the A585 that in my opinion revising the local plan to allow yet more houses in our area be madness.</p>		<p>in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of NPPF19 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites (already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
<p>Residents of Elswick (Peter Schiavi, Sandra Oldham, Stella Oldham)</p>	<p>Any new houses built in Elswick would increase the amount of vehicles to at least 170 cars & four to five hundred extra car journeys per day, most of which would be required to cross or join the exceptionally very busy A585 at the Thistleton junction. This is already a very dangerous junction with a lot of motorists struggling to either leave the Thistleton junction or enter the junction via the Singleton junction side. The extra housing would greatly increase the waiting times & exacerbate the risks at both these</p>	<p>N/A</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF19, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF19 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p>

	<p>junctions. Waiting to cross or enter the A585 normally takes five to 10 mins. When extra vehicles have been re-routed through the village in the past these times have increased as long as 20 minutes.</p> <p>Previously, Wyre Borough Council <u>rejected certain plans that Fylde Borough Council had put forward for housing developments due to the <u>unsuitable traffic issues & congestion it will cause on the A585. To develop further in Elswick will result in most traffic being brought onto the same A585 corridor.</u></u></p> <p><i>[The main representation draws attention to the lack of employment in close proximity to Elswick and does not necessitate travel and community facilities, specifically medical and dental practices, shops and schools. Inadequate bus services and transport options are also referred to].</i></p> <p>...The Government recommended that large housing developments are required to have an element of affordable housing. It is impossible to see how this could be viable in Elswick, with the village's lack of transport & the need for more than one car per household. For the residents of Elswick, two cars per household are a necessity. This was substantiated by a recent Parish survey that recorded an average there were 1.5 cars per household in the village.</p>		<p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>This response reflects concerns about increased housing numbers in Elswick and its impact on traffic.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
David Kirkham (Elswick Parish)	...the Fylde has already been over-developed with a detrimental impact on infrastructure- particularly the	N/A	In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined

<p>Council (PC), Greenhalgh with Thistleton PC, Staining PC, Ribby with Wrea PC, Weeton with Preese PC and Westby with Plumpton's PC)</p>	<p>flooding issues and poor state of the highways. Including excessive traffic with several bottlenecks being experienced on a daily basis.</p>		<p>in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that 'plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
<p>Sport England</p>	<p>Sport England would welcome inclusion of a supportive policy on active travel, especially where it could promote active design, which facilitates more active travel enabling people to become more active in their everyday lives, enhancing walking routes in and around towns and villages to attract people to do more walking and cycling. Any ability for development to protect and enhance the cycle, footpath and bridleway network would also be welcomed.</p>	<p>Inclusion of a supportive policy on active travel.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF19, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF19 states that 'plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as</p>

			<p>possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests policy changes which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>However, a number of these elements have been recognised in the Fylde Healthy Living Supplementary Planning Document (SPD), which was adopted by the Council on the 11th September.</p>
Housing			
<p>Indigo Planning on behalf of Greenhurst Investments Ltd.</p>	<p>....Given that the Fylde Coast is a defined and self-contained housing market area, in Greenhurst's view, it would be illogical if a proportion of Wyre's objectively assessed housing needs were met in Wyre's other neighbours of Lancaster, Ribble Valley and Preston. A more likely and appropriate response would be to ensure needs arising on the Fylde Coast are fully met across those authorities within the housing market area (i.e. Blackpool, Fylde and Wyre).</p> <p>...In addition, given the constraints owing to Blackpool's local authority boundary (due to its tightness around the urban area), there are clearly</p>		<p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>The Wyre Local Plan includes a requirement in its Policy LPR1 for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. The Inspector's report on the Wyre Local Plan Examination states in paragraph 19 that "I have amended the MMs to reflect the objective of Wyre meeting its own housing OAN".</p>

	<p>very few opportunities for Blackpool to help meet any of Wyre’s needs in addition to its own.</p> <p>Logically, therefore, the most likely location that could potentially accommodate new sites would be within Fylde. This is confirmed within the Inspector’s Report for the Wyre Local Plan [quote included in representation], albeit it is acknowledged that the ability of Fylde to contribute does not yet constitute a firm commitment.</p> <p>However, Greenhurst is concerned with Fylde’s contradictory statement that: <i>“Accordingly, the scope of the partial revision of the Fylde Local Plan to 2032 will be defined by the NPPF19 and the Duty to Cooperate. The Council is writing to invite comments on the scope of the partial revision. However, it should be noted that revisions to allocations for example will not fall within the scope of this partial revision and will not be taken forward as this would entail the production of a new Local Plan which is not necessary as the Local Plan is recently adopted.”</i></p> <p>Here, Fylde Council is both stating firstly that the scope of the partial review will be defined by the 2019 NPPF and the Duty to Cooperate, but secondly that the scope will exclude revisions to allocations. Greenhurst would question how, if at all, Fylde would be able to accommodate any of Wyre’s housing needs (which would effectively equate to a higher housing requirement in Fylde) if not willing to revisit existing allocations or make new allocations. This gives the</p>		<p>Therefore, it is currently anticipated that sites in Fylde will not be required.</p>
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	<p>impression that the outcome of the scoping consultation has already been pre-determined and it is paying 'lip service' to the Duty to Cooperate, which undoubtedly undermines the spirit of joint working with neighbouring authorities. In addition, just because a plan is recently adopted does not mean that it does not need revising in light of new evidence.</p> <p>Greenhurst would like to remind Fylde Council for the reasons why the Local Plan Inspector in her report (published September 2018) requested a main modification to the plan to ensure it is sound in relation to this issue [quotation relating to Paragraphs 69 and 70 of Inspector's Report included in main representation].</p> <p>Therefore, it is Greenhurst's view that in order to conduct a meaningful partial review, it should widen the scope to all policies and allocations that may be required to meet both Fylde's own needs and those of its neighbours under the Duty to Cooperate. Specifically, this should include considering the potential to revisit existing allocations or make new allocations.</p>		
Kath Fenton	<p>I wish to strongly object to a further revision of the local plan for Fylde as a resident of Elswick I and other residents are extremely concerned about transport and the highway issues we already face and this is before the 50 plus new homes have been built.</p>	N/A	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that 'plans may also need to be revised to reflect policy changes which this</p>

	<p>It seems to me the majority of new Great Eccleston residents use our village as a short cut to the A585 and therefore making it even more difficult to cross or access the main road when leaving the village I daily see people dicing with death trying to cross towards Singleton due to the vast volume of traffic on the A585 that in my opinion revising the local plan to allow yet more houses in our area be madness.</p>		<p>replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
Highways England	<p>.....Our understanding is therefore that the partial review of the Fylde Local Plan will be to establish whether changes in the density of the existing allocations can be made to yield higher housing numbers to assist in meeting the shortfall within Wyre. This would be against the background of possible changes to the assessed housing need for the area, brought about by a recently revised calculation methodology for housing need and the new NPPF [National Planning Policy Framework 2019].</p>	N/A	<p>The response provided by Highways England misinterprets the effect of the proposed review. It is not intended to increase the housing requirement in the borough as a result of the partial review exercise, and therefore the additional assessments that Highways England considers necessary should not be needed. Also, the Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032.</p>

			<p>Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The Council will engage further with Highways England as necessary, working through the Duty to Co-Operate, to ensure that an agreed position is reached.</p>
<p>The National Federation of Gypsy Liaison Groups</p>	<p>..the review should take account of the need to update the Gypsy and Traveller Accommodation Assessment (GTTA). We consider that the update review undertaken in 2016 was based on flawed evidence as it assumed a very low proportion of Gypsies and Travellers would meet the revised definition.</p> <p>The reduction in pitch requirement from 26 to 3 was a cynical attempt to exploit the change in definition as a means of the Council avoiding it responsibility to make proper provision for Gypsies and Travellers. It was not based on a robust assessment of need. The updated GTTA was not a comprehensive assessment of need and did not properly distinguish between those who did and those who did not meet the revised definition.</p> <p>Disregarding the flawed update, the previous GTTA is now completely out of date. The time has come to undertake a new GTTA, preferably in consultation with neighbouring authorities and to reflect the findings in this proposed partial review.</p>	<p>Undertake an up to date GTTA and reflect these findings within the partial review.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests updates to evidence and policy changes which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p>

<p>Gladman Developments</p>	<p>In determining the minimum number of homes needed, the NPPF19 now advises that strategic plans should be based upon a local housing need assessment, conducted using the Standard Method as set out in the PPG unless exceptional circumstances justify an alternative approach. Should the Council reconsider its housing requirement through the partial review, this will need to be formulated on the basis of meeting this requirement as a minimum.</p> <p>However, the PPG is clear that the Standard Method only identifies the minimum number of houses required to meet population needs and does not take into account the variety of factors which may influence the overall housing requirement in the area, such as changing economic circumstances or other factors which may change demographic behaviour. Where additional growth above historic trends is likely to occur, then the local planning authority should include an appropriate uplift to the housing numbers to meet the need in full. It is important that this uplift is undertaken prior to and separate from the consideration of the demographic baseline assessment of need and how much of this need can be accommodated in the housing requirement figure.</p> <p>...In addition, it is also important for local planning authorities to consider the implications that the Standard Method will have on delivering affordable housing need in full. The PPG is clear that the total affordable housing need should be considered in the</p>	<p>Take note of PPG guidance in the Council review their housing requirement through the partial review.</p>	<p>Comments noted. In undertaking the partial review exercise, the Council will need to consider the impact of changes to NPPG on the local housing need figure calculated using the standard method, as pointed out by the Gladman Developments. The partial review will have regard to all of the relevant guidance within PPG, as advocated by Gladman Developments.</p>
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	<p>context of its likely delivery as a proportion of mixed market and affordable housing developments taking into account the probably percentage of affordable housing to be delivered by market housing led development. If it becomes clear that affordable housing need will not be delivered in full then an increase to the total housing figures included in the plan should be considered where it could help to deliver the required number of affordable homes.</p> <p>Should the Council be minded to review their housing requirement through the partial revision process, it is imperative that the factors listed above [a list of PPG guidance for circumstances where the need to apply an uplift may be appropriate is provided in the main representation] are taken into account. In this respect, it is clear that the local factors and initiatives such as the Warton Enterprise Zone have the potential to boost the demand for housing within the Fylde authority area, over and above the levels that may be suggested by the Standard Method. In this context it is further relevant to note that the evidence base for the authority's recent Local Plan Examination suggested that the Council's future housing requirement should be set at the upper end of the OAN range of 410-430 dpa (dwellings per annum), to support economic growth in the area.</p>		
Residents of Elswick	<p>I STRONGLY OBJECT & am very concerned that Fylde Borough Planning Office is looking at further planning</p>	N/A	In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined

<p>(Peter Schiavi, Sandra Oldham, Stella Oldham)</p>	<p>permission to develop more new house in ELSWICK, PRESTON.</p> <p>Any new houses built in Elswick would increase the amount of vehicles to at least 170 cars & four to five hundred extra car journeys per day, most of which would be required to cross or join the exceptionally very busy A585 at the Thistleton junction. This is already a very dangerous junction with a lot of motorists struggling to either leave the Thistleton junction or enter the junction via the Singleton junction side. The extra housing would greatly increase the waiting times & exacerbate the risks at both these junctions. Waiting to cross or enter the A585 normally takes five to 10 mins. When extra vehicles have been re-routed through the village in the past these times have increased as long as 20 minutes.</p> <p>Previously, Wyre Borough Council <u>rejected</u> certain plans that Fylde Borough Council had put forward for housing developments due to the <u>unsuitable traffic issues & congestion it will cause on the A585. To develop further in Elswick <u>will result</u> in most traffic being brought onto <u>the same A585 corridor.</u></u></p> <p><i>[The main representation draws attention to the lack of employment in close proximity to Elswick and does not necessitate travel and community facilities, specifically medical and dental practices, shops and schools. Inadequate bus services and transport options are also referred to].</i></p>		<p>in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
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The Government recommended that large housing developments are required to have an element of affordable housing. It is impossible to see how this could be viable in Elswick, with the village's lack of transport & the need for more than one car per household. For the residents of Elswick, two cars per household are a necessity. This was substantiated by a recent Parish survey that recorded an average there were 1.5 cars per household in the village.

There is little demand for property in Elswick. There are numerous properties around the village already for sale. The development of such a large housing estate around the village would also destroy the character of a typical Fylde village.

The Government's strategy plan highlighted that *"any housing development had to be sustainable"*.

A SUSTAINABILITY STUDY UNDERTAKEN BY FYLDE CONCLUDED THAT ELSWICK IS ONE OF THE LEAST SUSTAINABLE VILLAGES IN THE BOROUGH.

Due to the above reasons I STRONGLY OBJECT TO FYLDE BOROUGH COUNCIL MAKING ANY INCREASE WITH THE ALREADY AGREED NUMBER OF NEW HOUSING DEVELOPMENTS STATED IN THE FYLDE BOROUGH COUNCIL LOCAL PLAN TO 2032

<p>David Kirkham (Elswick Parish Council (PC), Greenhalgh with Thistleton PC, Staining PC, Ribby with Wrea PC, Weeton with Preese PC and Westby with Plumpton's PC)</p>	<p>It is the concern of the Parish Council that the considered revision will result in further residential development in an already over-developed rural community. In the consideration of the Parish Council, the Fylde has already been over-developed with a detrimental impact on infrastructure – particularly the flooding issues and poor state of the highways, including the excessive traffic with several bottlenecks being experienced on a daily basis. There are several major developments across the Fylde awaiting construction as well as those mid-phase – there is simply no further requirement.</p> <p>Under no circumstances will the Parish Council support the over-spill from neighbouring Boroughs in order to satisfy their requirements to comply with planning policy.</p>	<p>N/A</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites (already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
<p>Turley on behalf of Strategic Land Group (SLG)</p>	<p>...The Fylde Local Plan (FLP) confirms that an early review of the plan would be required should any housing needs remain unmet in Wyre once the examination of the Wyre Local Plan (WLP) had been concluded. It is important to recall that during the examination of the FLP, Fylde Council were adamant that it could not accommodate any unmet housing</p>	<p>Inclusion of an up to date housing trajectory. Consideration to the delivery rates on</p>	<p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p>

	<p>need from Wyre in the FLP as the extent of any shortfall hadn't been quantified and tested through the Local Plan process. However, that process, which was ultimately concluded through the adoption of the WLP on 28 February 2019 did not result in a clear quantification of unmet housing need (to be met elsewhere) but that matter still requires further examination through its own immediate partial review. In short, the question of how much housing remains in Wyre is still unanswered.</p> <p>In this context, it is clearly prudent for the partial review of the WLP is conducted and completed so unmet housing need in Wyre is finally quantified and this can then inform the partial review of the FLP.</p> <p>...it is important that any partial review does not solely focus on simply adopting the standard method of housing supply but reflects the provisions of national policy in full and the delivery of sustainable development....</p> <p>The partial review of the FLP should include an up-to date housing trajectory in accordance with the requirements established within Paragraph 31 of the NPPF. In order to provide greater clarity and accuracy regarding delivery rates, the delivery rates on allocated sites should be considered alongside the housing trajectory submitted to the Examination in Public. This assessment should be used to assess whether assumptions within the trajectory are accurate and sufficiently deliverable and developable</p>	<p>allocated sites should be made alongside the housing trajectory.</p>	<p>The Wyre Local Plan includes a requirement in its Policy LPR1 for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. The Inspector's report on the Wyre Local Plan Examination states in paragraph 19 that "I have amended the MMs to reflect the objective of Wyre meeting its own housing OAN". Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>Comments noted. The Council, in undertaking the partial review exercise, will need to consider the impact of changes to NPPG19 on the minimum local housing need figure, as pointed out by the representor. The partial review will have regard to all parts of NPPF 19 and the guidance within PPG, as advocated by the Turley.</p> <p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that 'plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests changes which fall outside the remit of the Partial Review. Accordingly,</p>
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	<p>sites are allocated to meet the objectively assessed housing need.</p>		<p>the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>The Local Plan Inspector rejected the proposal for a detailed trajectory within the FLP32. This trajectory graph has been adapted to reflect the changes made as a result of the Partial Review and is included in the Schedule of Revisions. In accordance with paragraph 9.91 of the FLP32 the Council produces a detailed trajectory as part of its Housing Supply Statement. In 2019 this took the form of a Draft Annual Position Statement which has been published on the Council's website.</p>
<p>Bryning-with-Warton Parish Council</p>	<p>While the Parish Council acknowledges that Wyre Council have identified 'difficulties in planning to meet its objectively assessed need for housing' there is naturally a deep concern in the implications of a 'Housing Market Area and/or in 'Other appropriate locations'! The partial revision of Fylde Local Plan to 2032 appears from this communication/consultation to be consideration and capacity to accommodating quote 'Any need that remains unmet following the adoption of Wyre's Local Plan will need to be addressed Working with other authorities adjoining Wyre under the Duty to Co-Operate.</p> <p>Bryning-with-Warton Parish Council express concerns regarding the over-saturation of new housing developments in Warton and refers to how these do not achieve sustainable development.]</p> <p>...If Wyre are unable to meet their assessed need for housing this should be referred back to the</p>	<p>N/A</p>	<p>The Council is obliged to review the plan in accordance with paragraph 1.27 of the FLP32, as Wyre's Local Plan has been adopted with unmet need. However, the Wyre Local Plan policy LPR1 requires Wyre Council to immediately review its Local Plan with the objective of meeting the full objectively assessed needs for housing over the plan period. In addition Wyre's Policy LPR1 requires reconsideration/update of the housing need figure. Therefore, it is currently anticipated that sites in Fylde will not be needed.</p> <p>The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p>

	<p>Government without the perceived obligations being placed on neighbouring boroughs which would also like to retain some rural areas as opposed to being a built up metropolis of urbanisation.</p> <p>Again it has to be acknowledged that planning legislation is extremely complicated, ever changing and sometimes technically beyond comprehension to most mortal people not directly involved in the planning and development sphere but if this interpretation of the proposal is correct then the Parish Council would like it registered as an objection to additional housing quotas being absorbed in the Fylde.</p>		<p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
PWA Planning	<p>During the examination process for the Fylde Local Plan, PWA Planning raised concerns the Council had not responded proactively to the Wyre OAN position, and the consequences of this would lead to an unmet need of housing across the HMA, particularly in Wyre. This unmet need could be addressed by Fylde within the partial review.</p> <p>Furthermore, PWA Planning also raised concerns during the Local Plan examination process that the Council’s assumptions on build-out rates and development start dates were unrealistic. With this,</p>	<p>The partial review could need to set a new base date and consider the sites to meet the identified need over the next 15 years (as required by Paragraph 67),</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the</p>

	<p>the Fylde Local Plan was reliant on a number of large sites with significant infrastructure constraints.</p> <p>These arguments remain relevant to the partial review. As part of the partial review, PWA Planning consider that additional housing allocations are required to address the concerns. The addition of further land allocations (and specifically non-strategic locations or sites) in other appropriate locations across the Borough would ensure that there is a greater prospect of minimising the chances that the housing needs will not be met. It will also provide greater levels of flexibility and choice, as highlighted in the NPPF, ensuring development is delivered at the right time, in the right place, in accordance with the principles of sustainable development and a better balance of housing sites across the Borough.</p> <p>In this respect, Paragraph 68 of the NPPF is directly relevant as it recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area. In particular, Part A seeks for local authorities to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. As part of this, it may be appropriate for the partial review to set a new base date and consider the sites to meet the identified need over the next 15 years (as required by Paragraph 67), plus 2 years from the current base date. There is therefore clear need for further non-strategic allocations to ensure the</p>	<p>plus 2 years from the current base date.</p> <p>Inclusion of further non-strategic allocations.</p>	<p>replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The FLP32 provides for 10.1% of homes required on allocated sites under 1ha, and therefore meets the requirement.</p>
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	Development Plan provides housing to meet unmet need within the HMA, and the guidance set out within the NPPF.		
Lichfields on behalf of Taylor Wimpey UK	<p>These representations are made in relation to Taylor Wimpey’s land interest at Weeton Road, Wesham. The Weeton Road site was promoted for residential development through the now adopted Fylde Local Plan but was not identified as an allocation.</p> <p>Any new calculation of the housing requirement in the Partial Revision will need to ensure that the above factors [key policies] are fully considered.</p> <p>In accordance with the Framework and in line with the statutory duty to cooperate as set out under Sections 20(5)c and 33A of the Planning and Compulsory Purchase Act 2004, the Council should be co-operating with neighbouring authorities, including Wyre to ensure that any unmet housing needs are met. In order to ensure that the Plan is positively prepared and effective, an appropriate approach would be to consider the quantum of assistance that would be required to meet the HMA housing shortfall, and then plan to provide it in suitable locations close to the Wyre Borough boundary.</p>	Inclusion of the Weeton Road site.	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response presupposes that the outcome of the review will be a higher housing figure.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the</p>

	<p>The Framework [§59] is clear that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed. The preparation of a Local Plan Review in accordance with the commitment at §1.27 of the adopted Local Plan should not be seen as a mechanism to reduce the overall housing requirement for Fylde Council over the plan period and contradict the Government’s commitment to boost the supply of housing nationally.</p> <p>Taylor Wimpey wishes to emphasise that realistic assumptions need to be used in any supply calculations to ensure that sufficient sites are identified, and that land will come forward as required to meet need. A housing trajectory will be important to help identify which sites contribute to the Council’s claimed supply and assess whether the lead-in times and delivery rates for each site are correct. Taylor Wimpey considers that it is important for the Plan to include a housing trajectory as an appendix to the Partial Review as it helps demonstrate amongst other things a deliverable 5-year supply of housing.</p> <p>The Weeton Road site</p>		<p>housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>The Local Plan Inspector rejected the proposal for a detailed trajectory within the FLP32. This trajectory graph has been adapted to reflect the changes made as a result of the Partial Review and is included in the Schedule of Revisions. In accordance with paragraph 9.91 of the FLP32 the Council produces a detailed trajectory as part of its Housing Supply Statement. In 2019 this took the form of a Draft Annual Position Statement which has been published on the Council’s website.</p>
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	<p>Should a need for additional housing allocations be identified as part of the Local Plan Partial Revision process, Taylor Wimpey considers that land at Weeton Road, Wesham is the most suitable site for allocation.</p> <p>A Development Statement for the site has been prepared and is attached [See full representation].</p> <p>Conclusions</p> <p>It is imperative that any new calculation of the housing requirement in the Partial Revision fully considers whether there are “exceptional circumstances” which could justify an alternative approach which also reflects current and future demographic trends and market signals. As part of this process, the Council will need to co-operate with neighbouring authorities, including Wyre, to ensure that any unmet housing needs are met.</p> <p>In order to ensure that the Government’s objective of significantly boosting the supply of homes is achieved, Taylor Wimpey requests that the Council does not utilise the early review mechanism simply to reduce the overall need for housing in the authority.</p>		
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	<p>For the reasons identified above and in the attached Development Statement, it is considered that land at Weeton Road, Wesham should be allocated for residential development should a need for additional housing allocations be identified as part of the Local Plan Partial Revision process.</p>		
<p>Alban Cassidy</p>	<p>.....The likely outcome of this assessment is that additional housing land will need to be identified. The Housing Market Area covers Wyre, Blackpool and Fylde and therefore it is appropriate to seek to ensure that any such housing sites are located within one of these areas in an appropriate location, which we would expect would be based upon the settlement hierarchy in the first instance. However, we would not suggest that it is <u>not</u> appropriate at this time, given the recent adoption of the Local Plan to reconsider the hierarchy of settlements and therefore we would expect that Lytham St Annes remains the most suitable location for future housing sites.</p> <p>It is also important, in line with Government policy to increase the supply of housing, that the Plan is not seen to stagnate and therefore at an early stage the next allocations should be identified rather than continuing the previous appeal led system of allocation. It would not be acceptable for the Council not to consider any additional housing sites.</p>	<p>Identification of future housing allocations.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests additional housing allocations which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>This response also presupposes that the result of the partial review will be a higher housing number for the borough.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and</p>

	<p>Therefore in order to assist in meeting Wyre’s unmet housing need and to ensure that future housing is properly planned, the scope of the Local Plan review should include the identification of future housing allocations.</p> <p>The review should also consider and emphasise where appropriate, how the planning system in Fylde can assist the delivery of large sites and associated infrastructure. Too often in Fylde there has been insufficient joined up thinking in terms of the delivery of major housing schemes and the opportunity to influence and facilitate the provision of necessary infrastructure. The opportunity now arises and consideration should now be given to providing a more meaningful link between housing delivery and infrastructure provision.</p>		<p>means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Irrespective of the above, the Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>The FLP32 did comprehensively consider the delivery of large sites and associated infrastructure. An Infrastructure Delivery Plan was examined alongside the Local Plan which was found sound.</p>
Johnson Mowat on behalf of Carrington Group Ltd	<p>As the Council will be aware Highways England have been investigating options to alleviate a major bottle neck along the A585 between the Windy Harbour junction and the Skippool junction near Poulton-le-Fylde for a number of years.</p>	<p>The future development potential (including access) of land located to the west and east of the offline</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed</p>

	<p>Prior to the adoption of the Fylde Local Plan an announcement was made on 24 October 2017 that an offline 'southern' bypass solution between the two junctions was the preferred solution.</p> <p>It is proposed that the offline 'southern' bypass solution will be constructed (in part) on land currently controlled by Carrington Group Ltd. Carrington Group Ltd (on 29 April 2019) have therefore confirmed in writing to Highways England, that they wish to make representations at future hearings including the Compulsory Acquisition Hearing (CAH) (4 July 2019) and also attend the Accompanied Site Inspection (ASI) on 2 July 2019.</p> <p>It has always been the position of Carrington Group Ltd that the Council should be looking to allocate more land for housing in the north and north western part of the District. This position becomes even more logical when the opportunities offered by the offline 'southern' bypass are taken into consideration.</p> <p>The offline 'southern' bypass provides a good and logical opportunity to allocate additional land in a sustainable location, with good road links, access to employment, unconstrained by the green belt or</p>	<p>'southern' bypass.</p>	<p>as quickly as possible, either through a partial revision or by preparing a new plan.'</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests the addition of development land which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Irrespective of the above, the Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p>
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	<p>flood risk and also very close to the administrative boundary of Wyre (in particular the Poulton le Fylde).</p> <p>The requirement for Fylde Council to accommodate some of the Wyre Councils unmet need has been a key policy point for a number of years. It therefore seems perverse that the Highways England offline 'southern' bypass only serves to landlock suitable, deliverable, accessible and unconstrained development sites, through its failure to provide any suitable access points into neighbouring land.</p> <p>This does not constitute sound planning and therefore Carrington Group Ltd will be looking raise these issues at the CAH and ASI. Further, Carrington Group respectfully request that the future development potential (including access) of land located to the west and east of the offline 'southern' bypass falls within the scope of the partial revision.</p>		
Hallam Land Management Ltd (HLM)	<p>.....We consider that the main relevant changes to the NPPF for the purposes of the Local Plan partial review are revisions to the Green Belt chapter (chapter 13) and the definition of 'deliverable' sites (Annex 2).</p> <p>With regard to the Green Belt chapter, it is important to note that paragraph 137 of the revised NPPF states that "before concluding that exceptional circumstances exist to justify changes to Green Belt</p>	Policy changes in line with NPPF revisions to the Green Belt chapter, and the definition of deliverable sites.	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that 'plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed</p>

	<p>boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.” This includes discussions with neighbouring authorities about whether they could accommodate some of the identified need for development. This includes discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.</p> <p>As shown on the accompanying plan, HLM have a land interest at Lytham Road, Warton, which lies outside of the Green Belt and has been the subject of previous representations to the Fylde Local Plan.</p> <p>Although we appreciate that this scoping consultation is not directly concerned with revisions to allocations, we do feel it is relevant to point out that sustainable non-Green Belt opportunities within the Borough should- in the context of the revised NPPF – be explored before the release of any Green Belt Land. The land within the red line [see full representation] is the land we are wishing to promote for future development and we believe that this parcel is an appropriate location for development.</p>	<p>A change of policy to state that sustainable development adjoining the built-up areas of the Strategic Locations for Development will be permitted to deliver any shortfall of housing within the HMA.</p> <p>That attention is drawn to land at Lytham Road, Warton to assist in meeting Wyre’s housing need.</p>	<p>as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>It is not necessary to include any reference to Green Belt policy in the partial review because Policy GD2 of the FLP32 refers to national policy i.e. NPPF19 therefore no change is needed.</p> <p>The Council has used the new definition of ‘deliverable’ in its Housing Land Supply Statement which in 2019 took the form of a Draft Annual Position Statement which has been published on the Council’s website.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Irrespective of the above, the Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>This response presupposes that the result of the partial review will be a higher housing number for the Borough, and additional housing land allocations.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32)</p>
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	<p>In respect of the new definition of deliverability set out in Annex 2 of the revised NPPF, this is particularly important in the context of reviewing the Local Plan. As housing sites in the Borough will not have been assessed under the 2019 NPPF definition of 'deliverable' the Council's supply will need to be assessed to ensure they comply with the following criteria set out at Annex 2: [see full representation].</p> <p>.....Therefore, we support a partial revision to the Local Plan to ensure these policy changes are addressed.</p> <p>Wyre Council's Unmet Need</p> <p>...we welcome the review of the Fylde Local Plan to meet some of Wyre's unmet need under the Duty to Cooperate within sustainable locations.</p> <p>In order to accommodate the unmet need from Wyre Council, we recommend that Local Plan Policy DLF1 (Development Locations for Fylde) should be amended to provide more flexibility to bring forward appropriate development from the unmet need in the wider Housing Market Area (HMA) without the need to rely on the allocations. We therefore suggest that the policy should state that sustainable development</p>		<p>will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p>
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	<p>adjoining the built-up areas of the Strategic Locations for Development will be permitted to deliver any shortfall of housing within the HMA.</p> <p>Summary</p> <p>HLM have a land interest at Lytham Road, Warton. We are keen to support a partial review of the Fylde Local Plan to ensure the housing supply in the Borough has been appropriately assessed under the new definition of 'deliverable' contained in the 2019 NPPF and we support the proposals to meet the adjacent Wyre Council's unmet housing need in appropriate, sustainable locations under the duty to cooperate.</p> <p>With regard to the land at Lytham Road, Warton, we believe this is an excellent opportunity for non-Green Belt development within the Borough to help meet the unmet need of Wyre Council and deliver in the region of 175 dwellings. It is well-related to adjacent development and provides an opportunity for a link road to be provided from the recent developments from the north-east.</p>		
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<p>Hollins Strategic Land</p>	<p>Para. 1.27 of the adopted Local Plan (LP) commits the Council to an early review to examine the issue of how unmet housing need of Wyre Council (WC) should be addressed, working with other authorities adjoining Wyre under the Duty to Cooperate.</p> <p>Policy LPR1 of the adopted Wyre Local Plan (WLP) states that WC will bring forward a partial review of the Plan with the objective of meeting its full Objectively Assessed Housing Needs (OAHN) and that this will commence before the end of 2019 with submission of the review for examination by early 2022. The WLP only managed to make provision for 96% of its identified OAHN.</p> <p>It is acknowledged that the WLP Review <i>may</i> result in WC being able to meet 100% of its OAHN. However, that will not be known until 2022/23. If it is then found that assistance is required from Fylde, the unmet need will have to be delivered via a LP Review. This, in turn, would take a significant amount of time. The provision of the unmet need will not be secured for a number of years.</p> <p>However, if the Partial Revision (PR) of the LP were to identify sites that could make provision for the Wyre unmet need in the event that Wyre requires assistance from Fylde, the unmet need could be</p>	<p>Inclusion of land off Fleetwood Road, Wesham.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>The Wyre Local Plan has been adopted with unmet need. The Council will be producing a Statement of Common Ground with Wyre Council having regard to issues regarding the housing needs of the respective councils and the policies within each of the respective plans.</p> <p>Irrespective of the above, the Wyre Local Plan includes a requirement for a review to address the issue of the housing need within Wyre, including allocation of sites within Wyre to address any remaining unmet need. Therefore, it is currently anticipated that sites in Fylde will not be required.</p> <p>This response presupposes that the result of the partial review will be higher a need for additional housing land allocations. The Partial Review amends the housing requirement to figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum</p>
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	<p>secured much sooner. The PR would have secured housing allocations that could come forward as soon as the WLP Review were adopted.</p> <p>Furthermore, these sites could act as Reserve Sites for Fylde, in the event that the Council is failing to deliver its annual housing requirement. They would then form a dual purpose and this would represent positive planning, in line with the objective of the 2019 NPPF to significantly boost housing.</p> <p>As you will be aware, HSL has promoted land off Fleetwood Road, Wesham as a site which would align with the policies of the LP and has the potential to respond positively to the Wyre unmet need given its location close to the adjoining Borough. HSLs previous representation on the Additional Evidence is attached and section 4 sets out the reasons why this site would help to fulfil the dual role of assisting both Wyre and Fylde.</p>		<p>from 2011-2032. Introducing the range reduces residual requirement and means that the delivery of sites (already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p> <p>Accordingly, the Council does not propose to revise the FLP32 to reflect the requested change.</p>
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<p>JWPC Chartered Town Planners</p>	<p>It is apparent that the adjacent districts of Fylde, Wyre and Lancaster have all been struggling to meet the objectively assessed housing need over the past few years ahead of Local Plan production, with Lancaster most recently going through Examination.....</p> <p>...It is of paramount importance that the lack of housing land now affecting these three closely related districts is quickly addressed through the review of plans such as you propose for Fylde and in doing this, a broad approach is taken to consider all potential options available to meet housing need across the districts.</p> <p>We have been actively promoting a sustainable new village proposal on the land at the boundaries of Wyre and Lancaster for the past two years (allelgardens.co.uk). Whilst not related to the Fylde district, we believe that the approach taken for this site would meet the housing needs across the three districts in total, with limited impact in the wider context of the constraints of the three districts that have become apparent: namely highways, Green Belt and flooding, none of which is a stumbling block to this proposed development.</p> <p>The mixed-use village and commercial proposal is bold and broad in scope and whilst not directly related to the Fylde district, in pure numbers terms it would assist across the board in meeting housing need during the future plan periods of these districts.</p>	<p>Support for and inclusion of a sustainable new village proposal on the land at the boundaries of Wyre and Lancaster.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests support for a new village on the boundary of Wyre and Lancaster which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>The Partial Review amends the housing requirement figure to a range 275-415. The FLP32 already provides for the development of 415 dwellings per annum from 2011-2032. Introducing the range reduces the residual requirement and means that the delivery of sites(already included in the FLP32) will provide a five year supply thereby ensuring the Partial Review of the Fylde Local Plan remains effective.</p>
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	<p>We note also that the scoping does not appear to suggest future site allocations to be discussed and therefore would be a limited partial review. However, we understand that effectively this is very early in the process and trust that all options are open to consideration at this stage.</p>		
Climate Change and Flood Risk			
<p>Environment Agency</p>	<p><u>Flood Risk</u></p> <p>The Local Planning Authority (LPA) should ensure that flood risk is appropriately addressed in relation to the requirements of the revised National Planning Policy Framework (NPPF) and best available information.</p> <p>The Level 1 Strategic Flood Risk Assessment (SFRA) which forms part of the evidence base for the adopted local plan was produced in 2017 and is now out of date in relation to the NPPF and UKCP18. Additionally, due to updated modelling, the Flood Map for Planning has since changed, so the LPA should take this into consideration.</p> <p><u>Taking climate change into account</u></p> <p>.....the LPA should review the Level 1 SFRA, which forms part of the evidence base, and update it accordingly. Where any site allocations in the current Flood Zone 1 may be at risk of flooding in the future, a</p>	<p>Ensure the reflection of updates in terms of Flood Risk and Climate Change policy.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests an update to the SFRA and other evidence which has been updated, which fall outside the above.</p> <p>Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p>

	<p>Level 2 SFRA is likely to be required to justify the allocation in relation to current policy requirements.</p> <p><u>UK Climate Projections 2018 (UKCP18)</u></p> <p>Planning decisions (including supporting information, such as SFRA) should take account of UKCP18, which was published on 26 November 2018, in order to ensure planning decisions are in line with policies in the NPPF.</p> <p>UKCP18 is the official source of information on how the climate of the UK may change over the rest of this century. The UKCP18 projections replace the UKCP09 projections.</p> <p>The allowances in 'Flood risk assessments: climate change allowances' (published Feb 2016) are still the best national representation of how climate change is likely to affect flood risk or peak river flow and peak rainfall intensity. Research that is due to be published in 2019 may result in changes to these allowances.</p> <p>The climate change allowances for sea level rise in 'Flood risk assessments: climate change allowances' will be updated and published as early as possible in 2019. Until then, it is reasonable to continue to use the sea level rise allowances in the 2016 'Flood risk assessments: climate change allowances' for planning decision making, because of the allowances that have been used to date represent the high end of the range of sea level rise projected by UKCP18.</p>		
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<p>United Utilities</p>	<p>Emerging Planning Policy</p> <p>If any changes are to be made to planning policies within the Fylde Local Plan revision, United Utilities strongly encourages that the revised Local Plan includes a Policy on Surface Water and Foul Drainage....</p> <p>New development should manage surface water run-off in a sustainable and appropriate way in accordance with national planning policy. We wish to emphasise the importance of any future Local Plan policy setting out the need to follow the hierarchy of drainage options for surface water in national planning practice guidance which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water.</p> <p>United Utilities believe it would be most appropriate to split the issues of flood risk and surface water management into two policies as per your existing Adopted Fylde Local Plan. It is our view that a separate planning policy sets out a clear process in relation to Surface Water Management, creating an approach to drainage for all new development, rather than applications within certain criteria. If changes are to be made, we recommend the inclusion of the following draft surface water policy:</p> <p><i>‘Surface water from new development should be discharged in the following order of priority:</i></p>	<p>Inclusion of a policy on Surface Water and Foul Drainage.</p> <p>Inclusion of wording relating to Urban and Previously Developed Sites.</p> <p>Inclusion of a stand-alone policy on groundwater protection zones.</p> <p>Consideration of the points set out in the response concerning Wastewater Treatment Works.</p> <p>‘Landscaping in new development’</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests revisions to existing wording and new wording with respect to the water environment and flooding. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>These matters can be revisited when the Council carries out a review and update of the FLP32 in accordance with paragraph 33 of NPPF19, at which time all relevant matters will be reconsidered.</p>
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	<p><i>1. An adequate soakaway or some other form of Sustainable Drainage System (e.g. pond, swale, wetland etc).</i></p> <p><i>2. An attenuated discharge to watercourse.</i></p> <p><i>3. An attenuated discharge to public surface water sewer.</i></p> <p><i>4. An attenuated discharge to public combined sewer</i></p> <p><i>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available as part of the determination of their application.</i></p> <p><i>The expectation will be for only foul flows to communicate with the public sewer. Approved schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes.</i></p> <p><i>Applicants will be expected to incorporate site drainage as part of a high quality green and blue water environment. Unless a below ground infiltration system is proposed for the management of surface water, the council will expect applicants to manage surface water through sustainable drainage features with multi-functional benefits as opposed to a reliance on underground conventional piped and tanked storage systems. Any sustainable drainage system should be designed in accordance with 'Ciria C753 The</i></p>	<p>and 'water efficiency' to be taken forward.</p> <p>Inclusion of a development management policy on Infrastructure Provision and Coordination.</p>	
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	<p><i>SuDS Manual' or any subsequent replacement guidance.</i></p> <p><i>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked.</i></p> <p><i>On previously-developed land, applicants will also be expected to follow the surface water hierarchy. Thereafter, any proposal based on a proposed reduction in surface water discharge from a previously developed site should be in accordance with the non-statutory technical standards for sustainable drainage produced by DEFRA (or any replacement national standards) which target a reduction to greenfield run-off rate. In demonstrating a reduction, applicants should include clear evidence of existing positive operational connections from the site with associated calculations on rates of discharge as part of application submission material.</i></p> <p><i>For any development proposal which is part of a wider development site, it will be necessary to ensure the foul and surface water drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction. The applicant will be expected to include details of how the approach to drainage on a phase of development has regard to interconnecting phases within a larger site. Infrastructure should be sized having regard to interconnecting phases and drainage</i></p>		
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strategies should ensure a proliferation of pumping stations is avoided on a phased development. Any development proposal should ensure unfettered rights to discharge between the various parcels within an allocation and prevent the formation of 'ransom strips' to avoid a piecemeal approach to drainage and demonstrate how the site delivers sustainable drainage as part of interconnecting phases

Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces to reduce the volume and rate of surface water discharge.

Urban and Previously Developed Sites

...given the emphasis on development on previously developed land in Chapter 11 of the NPPF, we strongly believe new development on previously developed sites should set out how it achieves a significant volume reduction in surface water discharge with no surface water discharging to the existing public combined sewerage network as a standard expectation. This is in accordance with the non-statutory technical standards for sustainable drainage produced by

DEFRA (or any replacement national standards). There is a real opportunity to target a significant reduction in the surface water run-off rate, and proposed green infrastructure will help achieve that.

	<p>It is important to note that reducing the amount of surface water discharging to the public sewer network will reduce the risk of sewer flooding and reduce the pressure on combined sewer overflows and therefore resulting in environmental benefits for regions watercourses, subsequent water environment and adding potential benefits such as a net gain in biodiversity.</p> <p>..... If there is a consistent approach to surface water management as part of new development, the surface water entering the sewer network in the area will be significantly reduced, decreasing the discharges from such overflow points. This will result in the discharges occurring less frequently, as less surface water is entering the network, with resultant environmental improvements for the wider environment. This approach can only be achieved if early consideration is given to a holistic approach to surface water management that links into a wider strategy for environmental improvements as development on brownfield land in the authority come forward.</p> <p>With regard to the above, we would request the following policy wording be included in the revised Local Plan:</p> <p><i>'Development within urban areas should allocate space for the management of surface water through the use of sustainable drainage systems with multi-</i></p>		
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functional benefits as part of a high quality green and blue water environment'

Other Matters

Groundwater Source Protection Zones

Whilst Policy CL1 'Flood Alleviation, Water Quality and Water Efficiency' in the Adopted Fylde Local Plan (2018) requires developers to ensure that new development does not adversely affect the quality of surface and groundwater resources in Source Protection Zones and where possible contributes towards improving it, UU's preference would be to have a standalone Policy in the Local Plan, such as the following: *'In consultation with the council and relevant statutory bodies, applicants should consider the potential impacts on water quality resulting from the design, construction and operation of proposed development. Where necessary, development proposals should include measures to reduce any risk to the water environment and its ecology and aim to protect and improve water quality.*

Any proposals for new development within Groundwater Source Protection Zones must accord with latest national guidance on Groundwater Protection Principles. New development within Groundwater Source Protection Zones will be expected to conform to the following:

i) MASTERPLANNING – careful masterplanning is required to mitigate the risk of pollution to public water supply and the water environment. For

	<p><i>example, open space should be designed so it is closest to the boreholes so as to minimise the potential impact on groundwater. In addition, an appropriate management regime will be secured for open space features in the groundwater protection zone.</i></p> <p><i>ii) RISK ASSESSMENT - a quantitative and qualitative risk assessment and mitigation strategy with respect to groundwater protection will be required to manage the risk of pollution to public water supply and the water environment. The risk assessment should be based on the source-pathway-receptor methodology. It shall identify all possible contaminant sources and pathways for the life of the development and provide details of measures required to mitigate any risks to groundwater and public water supply during all phases of the development. The mitigation measures shall include the highest specification design for the new foul and surface water sewerage systems (pipework, trenches, manholes, pumping stations and attenuation features).</i></p> <p><i>iii) CONSTRUCTION MANAGEMENT PLAN - Construction Management Plans will be required to identify the potential impacts from all construction activities on both groundwater, public water supply and surface water and identify the appropriate mitigation measures necessary to protect and prevent pollution of these waters. Within Source Protection Zone 1, pipework and site design will be required to</i></p>		
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adhere to a high specification to ensure that leakage from sewerage systems is avoided.'

Should this policy be reviewed as part of the Local Plan Revision, we ask that you consider this addition.

Development next to Wastewater Treatment Works (WwTW)

When considering proposed development in proximity to an existing WwTW, we would urge you to consider the following:

1. WwTW are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental requirements. Maintaining a buffer is therefore desirable to respond to any requirements;
2. As a waste management facility, it is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. The wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.

The position of UU is that it would be more appropriate not to locate new housing sites close to a wastewater treatment works. If assessing the suitability of a site within close proximity to an existing treatment works, we would like to engage with you at the earliest opportunity to discuss the sites in further detail to ensure development is

	<p>planned in the most appropriate way and with the required impact assessments.</p> <p>.....This position is in line with the Agent of Change principle set out at paragraph 182 of the NPPF and paragraph 005 of The National Planning Practice Guidance: Water supply, wastewater and water quality. We would recommend that the following wording be included within the Local Plan Revision (if changes to policy are to be made) in relation to a Policy on the design and quality of development:</p> <p><i>‘Ensure that the occupiers of new developments will enjoy an appropriate standard of amenity and will not be adversely affected by neighbouring uses and vice versa’</i></p> <p>Landscaping in New Development</p> <p>United Utilities is of the opinion that there is a real opportunity to utilise the existing green (and blue) green infrastructure for surface water attenuation, improvements to biodiversity and resulting improvements to the wider water environment. On this basis, we would wish to see these policies and associated text to be carried through to the Local Plan Revision.</p> <p>Water Efficiency</p> <p>United Utilities are pleased to see a clear encouragement for water efficiency in the Adopted Fylde Local Plan. We would wish to see this carried through to the Local Plan Revision.</p>		
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	<p>Large Sites and Sites in Multiple Ownership</p> <p>United Utilities wishes to highlight that it has concerns regarding any large development sites that are in multiple ownership. The experience of United Utilities is that where allocations are large and in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently.</p> <p>This can lead to issues between interconnecting infrastructure between phases of development.</p> <p>We would encourage a pro-active approach to sustainable drainage to try and ensure communication between phases so there is sufficient capacity to serve the entire allocation area and not just one phase. Any drainage in early phases of the development should have regard to future interconnecting development phases. Planning applications for developments will be expected to demonstrate how the drainage proposal for that particular development site relates to the holistic drainage strategy as part of the wider development.</p> <p>Infrastructure Provision and Co-ordination</p> <p>At planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We recommend that</p>		
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	<p>you include a development management policy in your Local Plan Revision document to this effect:</p> <p><i>‘Once more details are known on development sites, for example, the approach to surface water management and proposed connection points to the sewer and clean water network, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.</i></p> <p><i>At the larger development sites, it will be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers.’</i></p> <p>Many of the rural areas within the Borough will be supported by infrastructure which is proportionate to its rural location. Therefore, United Utilities wishes to highlight that disproportionate growth in any settlement, especially small settlements, has the potential to place a strain on existing water and wastewater infrastructure. Any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to housing delivery. Generally Greenfield and/or Green Belt sites have limited or no supporting water supply and/or sewerage infrastructure assets.....Providing supporting infrastructure to Greenfield and/or Green Belt development sites could result in the need to upsize the existing assets to support growth. Therefore this may result in a need for a co-ordinated</p>		
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	<p>approach to phase development in line with any supporting infrastructure works.</p> <p>With regards to the growth in all settlements, United Utilities encourages information on anticipated delivery rates for development as soon as it becomes available. We would welcome sight of updated housing trajectory information when this is updated.</p> <p>United Utilities also requests the Council's support for future investment in its own infrastructure in order to be able to expediently respond to the needs of Central Lancashire. The following policy wording is recommended:</p> <p><i>'The Council will support the principle of investment in infrastructure to respond to the needs of the borough. Infrastructure is key to the delivery of sustainable development and economic growth and meeting development needs. The Central Lancashire Authorities will be supportive of infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives by water and sewage undertakers.'</i></p> <p>Utility Infrastructure</p> <p>Future developers should consider that sites may have existing infrastructure that crosses sites. It will be important that any applicant produces a detailed constraints plan to inform any development layout on these sites.</p>		
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Biodiversity			
Natural England	We agree with the proposed scope of the partial revision of Fylde Local Plan to 2032.... In addition, the Council should also review the Habitats Regulations Assessment and other environmental reports/assessments associated with the local plan.	Review of the HRA and other environmental documents associated.	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32.</p> <p>This response from Natural England supports the remit of the Partial Review of the FLP32.</p> <p>This response requests a review of the Habitats Regulations Assessment and other environmental reports/assessments associated with the Local Plan. A Sustainability Appraisal and Habitats Regulations Assessment of the Schedule of Revisions will be carried out and provided at Publication stage.</p>
Environment Agency	The Local Plan revision should have regard to the Government’s 25 Year Environment Plan (published in January 2018) and the ‘environment net gain’ approach. It should be demonstrated how the goals	Inclusion of aspects presented in the 25 year	In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.

	<p>set out in the 25 Year Environment Plan can be met for clean air; clean and plentiful water; thriving plants and wildlife; reduced risk of harm from environmental hazards; more sustainable and efficient use of resources; enhanced beauty, heritage and engagement with the natural environment.</p> <p>Links between green infrastructure (GI) provision and wider biodiversity net gain requirements of the 25 year Environment Plan and the revised NPPF (paragraph 170) should be considered and policies/justification updated accordingly.</p> <p>Reference should be made to the links between improved/enhanced GI resources and the delivery of biodiversity net gains, where such opportunities exist. Without this, there is a risk that opportunities to protect and enhance GI resources do not give sufficient weight to the potential gains associated with the proposals.</p> <p>Consideration should be given to updating policies to include a requirement that developers will be expected to demonstrate how their scheme provides net gains for biodiversity where appropriate.</p> <p>The LPA should also consider biodiversity accounting and habitat evaluation procedures to deliver biodiversity net gains through the planning process.</p>	<p>Environment Plan.</p> <p>Updates to policies to reinforce the links between GI provision and biodiversity net gain.</p> <p>Inclusion of a policy to show how developers will provide for biodiversity net gains.</p>	<p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests changes to Chapter 13 of the FLP32 to reflect the changes made by NPPF19.</p> <p>Revisions have been made to wording of policies and text in Chapter 13: Conserving and Enhancing the Natural, Historic and Built Environment. These revisions are intended to reflect the changes to environmental policy brought about by NPPF19. They are detailed in the Schedule of Revisions to the FLP32 which will be published for consultation.</p> <p>In addition, on the 11th September 2019, the Council adopted a Biodiversity Supplementary Planning Document which does include aspects presented in the 25 Year Environment Plan and reinforces the links between GI provision and net gain.</p>
<p>Historic Environment</p>			

<p>Historic England</p>	<p>Historic England has produced a number of good practice advice notes on the historic environment, in particular the Good Practice Advice Note on the Historic Environment and Local Plans (https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/), which provides supporting information on good practice in plan-making, and the Historic Environment and Site Allocations in Local Plans (https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/) may be useful in the production of your Plan.</p> <p>Any revisions to the Local Plan for Fylde will be expected to ensure that it includes a proper description, identification and assessment of the historic environment and the supporting evidence base is expected to include heritage information. The Plan will also need to demonstrate how it conserves and enhances the historic environment of the area and guide how the presumption in favour of sustainable development should be applied locally. This includes ensuring that any sites, which it is proposing to put forward for development, will assist in delivering such a strategy.</p>	<p>Inclusion of comprehensive heritage information.</p>	<p>In line with the transitional arrangements set out in paragraph 214 of NPPF 2019, The Fylde Local Plan to 2032 was examined in accordance with the National Planning Policy Framework (NPPF) 2012.</p> <p>Paragraph 212 of the NPPF 2019 states that ‘plans may also need to be revised to reflect policy changes which this replacement Framework has made. This should be progressed as quickly as possible, either through a partial revision or by preparing a new plan.’</p> <p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes of the replacement NPPF 2019 and the early review triggered by paragraph 1.27 of the FLP32. This response requests that revisions to the Local Plan include a proper description, identification and assessment of the historic environment and the supporting evidence base including heritage information which fall outside the above. Accordingly, the Council does not propose to revise the FLP32 to reflect the requested changes.</p> <p>However, Paragraph 13.52 of the Local Plan will be amended to clarify that any decisions will be taken in line with the Framework. This will address the addition of a sentence in the NPPF19 regarding the particular weight given to a heritage asset.</p>
<p>Community Facilities</p>			
<p>Sport England</p>	<p><u>Any potential Site Allocations</u></p>	<p>Inclusion of policy wording</p>	<p>The Council has resolved to carry out a partial review of the adopted plan in order to reflect the policy changes that the</p>

	<p>Sport England considers that any sites identified in the should be consistent with our Playing Fields Policy and any present, past or future contribution of the site for sport be considered and identified in any site assessment. This is especially important where Sport England would be a statutory consultee on developments that would prejudice the use of playing fields as defined by Article 16(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010 in that it is on land that has been used as a playing field within the last five years, and the field encompasses at least one playing pitch of 0.2 ha or more, or that it is on land that allocated for the use as a playing field in a development plan or in proposals for such a plan or its alteration or replacement.</p> <p><u>Site Assessment – Methodology</u></p> <p>In relation to the site allocations, when decisions are made about which locations will be brought forward and their potential dwelling capacity, it is requested that consideration be given to whether any of the sites contain existing sports facilities such as playing fields which justify protection be considered fully in the Council’s Playing Pitch Strategy and paragraphs 96 and 97 of the NPPF. This strategy should enable sites to be considered in accordance with Sport England’s</p>	<p>regarding maintenance and enhancement of a network of high-quality open spaces in line with para 97 of the NPPF.</p> <p>Inclusion of policies that relate to the Provision of Community Facilities, planning obligations and sustainable development as set out in the main representation.</p>	<p>replacement NPPF 2019 and the FLP32 paragraph 1.27 has made. This response requests that revisions to the Local Plan includes the inclusion of policies that relate to the provision of community facilities, planning obligations and sustainable development. These issues are already covered in FLP32 and adding new text would not fall within the remit of this review.</p> <p>There is a proposed revision within the Proposed Schedule of Revisions which would alter the reference to paragraph 74 (NPPF12) in Policy ENV3 to paragraph 97 (NPPF19). 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> <p>The other matters raised can be revisited when the Council carries out a review of the FLP32 in accordance with paragraph 33 of NPPF19, at which time all relevant matters will be reconsidered.</p>
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	<p>Playing Fields Policy and identify anywhere disposal for other uses could be possible. Although it also should consider the extent to which development in certain locations should account for the need to maintain such facilities and site policies should require the facilities to be protected or replaced.</p> <p>You may present evidence for sites on a proforma, where there is a proforma for each site, we would welcome inclusion of a grid reference for each site; and criteria for 'playing field' or 'sports land use'; or within x metres of a playing field or sporting facility within said proforma, as it could significantly reduce the amount of time taken for us to review and check each site manually using the data provided, Active Places Power and Google Earth satellite imagery. Playing fields or sports use should also be included in the policy constraints section as release of such sites for development requires consideration in accordance with paragraph 96 and 97 of the NPPF.</p> <p>We would welcome consultation or discussion with Sport England where allocations directly or indirectly affect the use of playing fields or other sporting infrastructure. The Council will be aware of Sport England's role as a statutory consultee on planning applications affecting playing fields and therefore it is important that consideration is given to the implications for existing sports facilities when</p>		
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	<p>decisions are made about site allocations. Sport England would wish to avoid having to make potential objections through the local plan process and the subsequent planning application process to address the impact of potential allocations on community sports facilities. Data is readily available from your own Playing Pitch Strategy or Active Places Power website.</p> <p>Any potential allocations on sports sites or affecting sports sites should be based on an up to date Playing Pitch Strategy as robust evidence is required by NPPF paragraph 97 to justify the release of several playing fields/recreation sites for development if proposed.</p> <p>Where greater housing need is demonstrated Fylde may also wish to commission evidence in a Built Facilities Strategy to ensure that decisions about planning for meeting the current and future indoor sports facility needs of the community through the Local Plan, are also based on up-to-date evidence. Furthermore a robust evidence base to provide a clear understanding of current and future indoor community sports facility needs is essential for informing a review. You are advised to check the status of any current evidence on this matter and determine whether a new study or a refresh could be required.</p>		
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Sport England has published a range of recent guidance to help local authorities especially our Assessing Needs and Opportunities Guidance (2014) <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>. Detailed guidance on the importance of having robust and up-to-date assessments of sports facility needs for underpinning local plan policies is set out in Sport England's 'Planning for Sport – Forward Planning Guide' (2013) which can be downloaded from www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/.

Open Space and Local Green Space Provision

We would welcome a policy that aims to maintain and enhance a network of high-quality open spaces, including those that provide opportunities for sport, physical activity and recreation, private and public. Policy should recognise the role of sport in contributing to a wide range of spatial planning issues including: regeneration, health promotion, crime reduction, quality of life, engaging with colleagues in sports development, education and public health. The Review should identify and plan positively for where sport and recreation can contribute to spatial planning initiatives such as

greenspace networks or enhance the urban fringe (and Green Belts) through the location of appropriate facilities. All playing fields are a finite resource protected by paragraph 97 of the NPPF and Sport England's Playing Fields Policy. We strongly recommend that any policy wording takes account of this.

Provision of Community Facilities

We would support inclusion of a policy that seeks to support proposals for new and improved community facilities and suggest that you include references to access to playing fields and other sports or recreation sites, and consider any wording in line with both our own Playing Fields Policy and paragraph 97 of the NPPF. Policy should set out a positive approach to the provision and enhancement of sports facilities that are fit for purpose and in suitable locations, addressing needs identified through a robust and up-to-date assessment. Policy needs to clearly state that sports facilities (built as well as pitches, open space and recreational land) will be protected from loss except where it is demonstrated that the site is surplus to requirements; or equivalent or better facilities will be provided; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. We also

suggest that the Councils Playing Pitch Strategy and Build Facilities Strategy are referenced here as evidence for such a policy.

Community Benefits/Planning Obligations

Sport England would welcome inclusion of a policy to secure developer contributions required to provide infrastructure, facilities and services as a result of new development. The policy should set out the expectations associated with sport and recreation that are to be included in new development, as well as those to be provided through section 106 contributions and/or planning obligations. Again, reference to the Councils own evidence in its Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS) may be relevant here.

Sustainable Development

Sport England would welcome policy to deliver the concepts of active design in sustainable development to facilitate active lives for the boroughs residents.

Sport England would support the inclusion of a policy to protect, enhance and extend green infrastructure resources. We would welcome specific mention of the value of playing fields, sporting and other

	recreational sites to the green infrastructure network. Along with references to paragraph 97 of the NPPF, to the Councils own PPS and BFS.		
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Authorised by: Julie Glaister, Planning Policy Manager