



Fylde Local Plan to 2032: Revised Preferred Option consultation

DRAFT RESPONSES REPORT

February 2016

Summary of comments received and the Council response

This report is structured in parallel to the chapters in the Fylde Local Plan to 2032 – Revised Preferred Option consultation document.

Contents

		Page
Preface		2
Chapter 1:	Introduction	4
Chapter 2:	Spatial Portrait of Fylde	17
Chapter 3:	The Local Plan's Vision for Fylde	28
Chapter 4:	The Strategic Objectives for Fylde	34
Chapter 5:	National and Sub Regional Policy	43
Chapter 6:	The Development Strategy	45
Chapter 7:	Strategic Locations for Development, Strategic Development Sites and Non-strategic Development Sites	75
Chapter 8:	General Development Policies	143
Chapter 9:	The Fylde Economy	161
Chapter 10:	Provision of Homes in Fylde	189
Chapter 11:	Health and Wellbeing	228
Chapter 12:	Infrastructure, Service Provision and Transport	236
Chapter 13:	Water Resource Management, Flood Risk and Addressing Climate Change	249
Chapter 14:	Conserving and Enhancing the Natural, Historic and Built Environment	259
Chapter 15:	Next Steps	270
Glossary and Appendices		272
The Draft Infrastructure Delivery Plan		286
Sustainability Appraisal		304
Habitats Regulations Assessment – Screening Report		308
Rural Proofing Assessment		311
Health Impact Assessment		312
Fylde Local Plan - Economic Viability Assessment		314
Appendix A:	List of consultees who made representations on the Fylde Local Plan Revised Preferred Option (the RPO)	317
Map	Specific sites submitted during RPO Local Plan consultation	322

Preface

Preface

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to the Preface

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in the Preface which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend text in the second paragraph in the Preface to read: 'Blackpool Airport and its associated Enterprise Zone'
- Amend text in the third paragraph to read: 'To accommodate the level of ~~growth~~ development proposed ...' Throughout the Local Plan all references to '~~growth~~' are to be replaced by the word 'development'.
- Amend text in the fourth paragraph to read: 'The ~~Revised Preferred Option document~~ Publication version represents an important process in the preparation of the new Local Plan for Fylde. The document has been prepared following the results of previous public consultations on the Local Plan Issues and Options, ~~and the Preferred Option and the Revised Preferred Option~~ (RPO) documents and by taking account of the information provided by the ~~Council's~~ evidence base.'
- Amend the final paragraph to read: 'I very much look forward to hearing your views and receiving your representations on the soundness of the policies and proposals set out within this ~~Revised Preferred Option document~~ Publication version of the Local Plan'.
- Amend the text under the sub-heading 'How to Comment' to read: 'At this

Publication stage, representations on the Local Plan must be submitted in a particular format because all representations will be submitted with the Local Plan for Examination by a Planning Inspector.

The Planning Inspector can examine the Local Plan document with regard to two matters:

- Legal Compliance - whether the document has been prepared in accordance with all the relevant legislation.
- Soundness - whether the content of the document represents a 'sound' document, with regard to whether the document is:
 - Positively prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.

The Council has prepared a Statement of Representations Procedure, a standard form for representations and a guidance note to help all interested parties to make a formal representation and complete the relevant forms. These explain further the matters of legal compliance and soundness. All of these documents are available at the Council Offices and libraries, or on the Council's website www.fylde.gov.uk/localplan/

~~The Council welcomes your comments on the scope and content of this document as part of this Regulation 18 consultation, together with the following technical assessments of the Local Plan:~~

- ~~➤ Sustainability Appraisal~~
- ~~➤ Habitat Regulations Assessment – Screening Report~~
- ~~➤ Health Impact Assessment~~
- ~~➤ Equalities Impact Assessment~~
- ~~➤ Rural Proofing Assessment~~
- ~~➤ Viability Assessment~~

Where the document is available

The Publication version of the Local Plan ~~Revised Preferred Option document~~ is available online at www.fylde.gov.uk/localplan/ or paper copies are available to view at Fylde Direct at St Annes and at libraries across Fylde. The document is also available on CD from the Planning Policy Team (see contact details below).

~~Council officers will also host drop-in sessions around the Borough during the consultation period to provide the opportunity for members of the public to come along and ask questions about the Revised Preferred Option document and for guidance on making a representation.~~

There are a number of ways you can comment on the ~~Revised Preferred Option document~~ Publication version:

- Amend the 'Abbreviations' to include: 'LAPS – Local Areas for Play' and 'LEAPS – Local Equipped Areas for Play.'

Chapter 1: Introduction

Chapter 1: Introduction

Number of representations:

Comment	Support	Object	Total
35	2	18	55

(Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents. This occurs throughout the Responses Report)

Representations received from:

- Home Builders Federation
- Natural England
- CPRE – Fylde District
- Lancashire County Council
- Wyre County Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- 4 Developers
- 2 Action Groups
- 5 Residents

What you said

Paragraph 1.1

A developer is supportive of the council's approach to identifying a suitable plan period from 1 April 2011 to 31 March 2032. If adopted in 2017, the Local Plan would still be drawn up over the required timescale of at least 15 years, in accordance with paragraph 157 of the Framework.

An Action Group commented that it was very much in favour of the Local Plan.

Paragraph 1.7 - Neighbourhood Development Plans

Natural England commented that since some Neighbourhood Development Plans are being prepared in advance of the Local Plan, it would be helpful to include the following text in the Local Plan: 'Where a Neighbourhood Plan could lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats & Species Regulations (as amended) 2010 (the 'Habitats Regulations') and the Environment Assessment of Plans and

Programmes Regulations 2004. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if it would result in a likely significant effect on any European Site (see Schedule 2, The Neighbourhood Planning (General) Regulations, amended 2015). Therefore reduction and/or avoidance measures may need to be incorporated into the Neighbourhood Plan to ensure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the HRA for the Local Plan. In addition to the HRA process, if environmental effects are predicted a SEA screening exercise should also be undertaken. A SEA may be required where:

- a neighbourhood plan allocates sites for development*
- a neighbourhood plan contains sensitive natural assets that may be affected by the plan*
- a neighbourhood plan may have significant effects that have not already been considered and dealt with in the Sustainability Appraisal for the Local Plan.'*

An Action Group's preference for taking development in Newton forward and to fairly address residents' concerns, would be through the creation of a Neighbourhood Forum, development of a neighbourhood plan and a subsequent referendum.

Two residents objected claiming that all comments made against the Preferred Option version of the Local Plan in 2013 were a waste of time and effort when it was issued, without any prior consultation with the residents of Warton to inform them of what the council was intending to do to this area, resulted in the village being subjected to a deluge of planning applications from developers, who saw the issuing of the Preferred Option version of the draft Local Plan as giving the green light to begin major development in and around the village. Consequently, this latest attempt to plan for future development in the Fylde is already out of date where it concerns Warton and experience from the previous draft Fylde Local Plan to 2030 has shown that there is little point in providing extensive detailed comments because: the RPO version of the Plan to 2032 is already out of date as a result of the Secretary of State's decision to approve the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674), against the objectives of local residents, Fylde Council and LCC. Any comments that are made against the new draft will not stop the tide of planning applications for new major housing developments in and around Warton that residents are still facing on an almost monthly basis. The Government wants developers to build as many homes as possible, and so in the end the developers will just build what they want where want, because ultimately the Secretary of State will approve their application, no matter what we want. All the effort that Warton villagers put into their Neighbourhood Development Plan has also been a waste of time because the council has still not progressed the formal adoption of the Plan and so it will continue to be afforded very little weight, as stated by the Planning Inspector and Secretary of State when they recommended approval of the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674). The Neighbourhood Development Plan is now pointless, worthless and a waste of time and money.

Paragraph 1.8

An Action Group commented that 'new homes, jobs and services are located in the most sustainable locations ...' is an admirable aim, but has not been attempted in the recent past (e.g. 15/0458 – Land East of Willow Drive, Wrea Green). The Action Group claimed that that application did not consider sustainability properly.

Paragraphs 1.10 – 1.19 – Duty to Co-operate

*The Home Builders Federation and three housing developers recognised that a considerable portion of the evidence base has been jointly undertaken / commissioned with neighbouring authorities and there are good working relations under the Duty to Co-operate between the Fylde Coast Authorities. The council will be aware that it is essential in complying with the duty that the council goes beyond merely consulting with neighbouring authorities, but rather it should implement actions and have evidence of high level agreements to tackle strategic issues. The council will be aware of the recently published government guidance upon the duty which states 'it is unlikely that this (the duty) can be satisfied by consultation alone' and that 'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'. In this regard it is noted that a memorandum of understanding has been signed between the Fylde Coast Authorities of Blackpool, Fylde and Wyre which indicates how they will continue to work together on strategic issues and details the governance arrangements. This has resulted in Fylde agreeing to accommodate around 14 Ha of employment land to meet Blackpool's requirements. This is encouraging and indeed was referenced within the recent Inspectors report into the Blackpool Core Strategy. The issue of housing delivery is a strategic priority for Government and in compliance with Framework paragraph 178 it is essential the council provides evidence of joint working on this issue. This is particularly important in the context of Fylde given the joint Housing Market Area (HMA) which is shared with the adjoining Councils of Wyre and Blackpool. The council will note that the Blackpool Core Strategy Inspector's report required a main modification (paragraph 9) to ensure that joint working continued with regards to housing and meeting the full needs of the HMA. It is also clear that at this stage all three authorities are committed to meeting their own housing needs within their own boundaries. In this regard the Home Builders Federation raised concerns with the Fylde housing requirement, see policy **DLF1**, below, but also the overall housing to be delivered across the Fylde HMA and how this aligns with the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs over the period 2015 to 2025 LEP Strategic Economic Plan. It is therefore recommended that the council provide a statement upon the co-operation that has occurred to date and how the plan responds to the wider housing requirements for the HMA and LEP ambitions to create 50,000 new jobs.*

Wyre Borough Council (along with Blackpool and Lancashire County Council) has worked with Fylde Council under the Memorandum of Understanding which sets out the parameters for joint working across the Fylde Coast sub-region. Several joint pieces of evidence have been produced to support the respective Local Plans. As a neighbouring authority Wyre Borough Council is a key consultee under the Duty to Co-operate. Wyre Borough Council has

considered the Revised Preferred Option and is, in general, supportive of the emerging Fylde Local Plan.

An Action Group questioned where Whyndyke Farm fits with the Duty to Co-operate, the Fylde Coast Authorities Joint Member and Officer Advisory Steering Group and joint working with neighbouring local authorities on strategic priorities highlighted in the Framework and local cross boundary needs.

A resident objected claiming that there did not appear to have been cross boundary co-operation with Preston City Council. Account should be taken of the large number of homes which are being built on the west end of Preston, abutting the boundary of Fylde Borough.

Paragraph 1.24

An Action Group objected claiming that the Preferred Option version, 2013 was ignored and an alternative proposed, which was not acceptable. Why was a sixth option necessary and why was the Preferred Option ignored – to get the ‘right result’?

A resident commented that this section implied that the council responded to the consultation and produced a new option in response to feedback from the consultation. The resident claimed that this was not the case. The section should more accurately state that: 'The Council decided to ignore the majority wishes of those consulted and create a new option, that was not put forward for re-consultation against the other choices. This new option was the basis of the highly flawed Preferred Options document that was subsequently issued for consultation.'

Paragraph 1.25

A resident objected that this section misrepresents the council's position. It should state: 'The Council took little or no account of the feedback from the Issues and Options consultation in preparing the Preferred Options draft plan. The Council creatively introduced a category ‘Strategic Locations for Development’ that had not been referred to before in the consultation process and that had previously been used in the Lancashire RSS to refer to very major new developments in areas (such as the Royal Ordnance site) remote from existing settlements. The Council recognises that the draft Preferred Options document bore no resemblance to any of the proposals previously put forward for consultation and therefore carried no consultative authority. Furthermore the draft Preferred Options proposals were inconsistent with the clear directions in the two previous structure documents (Joint Lancashire Structure Plan and Lancashire Regional Spatial Strategy) in assigning substantial development at Warton. The Council therefore recognises that its long delayed Preferred Options draft lacked any material authority'

Paragraph 1.28

An Action Group objected that the proposals in the Revised Preferred Option have already been breached (planning approval 15/0458 in Wrea Green). The Action Group asked: where is the joined up thinking and approach?

Paragraph 1.29

An Action Group objected to the wording ‘...changes to national planning policy ... has informed the Revised Preferred Option’ suggests that there have been changes to the Framework, but there have been none.

Paragraphs 1.31-1.32 - Technical Assessments

A developer commented that the Sustainability Appraisal was dated 19th November 2015, and was therefore available for less than 2 of the 7 weeks of the consultation period. This is not considered sufficient time to review this document, especially given that it runs to 767 pages. In light of this, the developer reserved the right to make further comments to the council on the SA beyond the consultation period. The timing of the SA's publication also raises questions over the soundness of the plan, as this process is supposed to: 'feed into the plan making process. This involves the ongoing appraisal of the plan and makes recommendations to steer its direction to avoid potentially adverse consequences. This is particularly important when considering alternative strategy options.' It is unclear how a document published 5 weeks into the consultation period on a Local Plan document could have informed the options chosen in the plan. Paragraph 1.32 notes that the consultants preparing the SA have been working with officers and making recommendations throughout the preparation of the plan; however there is no evidence of this, as the last formal Sustainability Appraisal document was issued in June 2013 to support the Preferred Options Local Plan. Since then, the Local Plan Responses Report (July 2014) and at least two draft versions of the current Revised Preferred Option Local Plan (June 2015 and September 2015) have been through the Council's Committee process, but none of these have been supported by an SA document. Therefore even if the consultants have made recommendations to Officers, this information was clearly not made available to Committee members when they approved it for consultation. Accordingly, the publication of this document at this stage suggests that it has been produced after the fact to support an already agreed strategy which seriously undermines whether the plan is positively prepared and justified, two of the key tests of soundness.

Paragraph 1.33 - Cross Cutting Themes

An Action Group objected claiming that they did not consider health, wellbeing or sustainability had been considered to date for Wrea Green and health is not considered for the future, within the Local Plan.

Paragraph 1.34 - Infrastructure Delivery Plan

An Action Group objected claiming that they did not consider that the real need for growth had been properly identified. The Action Group claimed this needs to be related to realistic needs and evaluated as the period progresses.

Paragraphs 1.40 and 1.41 - Mineral Safeguarding Areas

Lancashire County Council (LCC) commented that it will endeavour wherever practicable to provide assistance to Fylde Council in interpreting technical geological information submitted in support of an application within a Mineral Safeguarding Area (MSA), it is for Fylde Council to determine the sustainability of permitting an application within a MSA.

LCC commented that there does not appear to be any reference within the plan or any supporting information, to an assessment of the sustainability of development within the MSAs, or to the sustainability of the draft Plan allocating land for housing within an MSA. It should be noted that, whilst the survey may result in a short delay, the potential for significant delay to the delivery of a scheme will arise if prior extraction is identified as a requirement of the planning permission, and this has not been raised as an issue early in the project's design and inception.

Paragraphs 1.43 and 1.44 - Shale Gas Exploration, Production and Distribution

CPRE – Fylde District commented that the RPO grossly understates the planning responsibilities associated with exploration and exploitation which will fall to Fylde Council. The RPO acknowledges that applicants must receive permission for exploration and exploitation from Lancashire County Council under their Mineral and Waste Planning powers. But exploration and exploitation will necessitate significant infrastructure, such as: water and waste pipelines; pumping stations, storage tanks and lagoons; electricity and gas supply networks; site access roads; buildings, lighting and fencing. CPRE – Fylde District considered that the policies must be sufficiently robust to protect the existing settlements and the countryside and Green Belt through measures such as: Impact on tranquillity, i.e. noise and visual disturbance especially to habitations; control of flaring of gas; and undergrounding of services, pipelines etc. CPRE – Fylde District has been recommending that if consent is given at sites in Fylde, LCC should ensure that fracking stays within the specified target formation. This is because the Environmental Permit fails to adequately address this issue, with higher risks associated with the activity as a result. The Oil and Gas Authority says this issue will be dealt with via the Hydraulic Fracturing Plan, but importantly this document will not be public and therefore CPRE – Fylde District sees that a key area of regulation is not going to be transparent. In making this recommendation, CPRE – Fylde District are well aware that the Planning Practice Guidance for the National Planning Policy Framework states that local authorities are not to duplicate the work of the regulatory authorities. However, the Planning Practice Guidance also states that local authorities have a responsibility to be satisfied that the regulatory authorities can and will address the issues which would normally be considered their responsibility. Since we have demonstrated both the EA and the OGA are failing to exert the necessary regulation, it becomes the responsibility of the Lancashire County Council (as the Minerals Planning Authority) to make good that deficit. But if Lancashire County Council fails to enforce a planning condition that is readily enforceable as part of the land use planning regime, it would fall to the responsibility of Fylde Council. It would be easy to do as it only requires that a planning officer inspects, at times of their own choosing, the records of the Hydraulic Fracturing Plan as actually executed (the relevant documents are required by the EA to be available on site). The sections on Shale Gas Exploration, Production and Distribution in the RPO should recognise the responsibilities of Fylde Council.

Medlar with Wesham Town Council raised a major concern for the potential for shale gas exploration having a negative impact on the beauty of the countryside and the welfare of residents of Fylde, including a significant increase in heavy goods traffic.

Newton with Clifton Parish Council commented that the potential for shale gas exploration, production and distribution in the Fylde area, referred to in the Local Plan, could have significant adverse impacts on the quality of rural life affecting, biodiversity, farming, rural tourism and transportation routes.

A resident commented that there did not appear to be much reference in the Local Plan about the prospect of shale gas extraction in the Fylde and the Borough's position on this. It could, if given the go ahead at County Hall or Westminster, have the most significant and damaging impact on the Fylde in terms of environment, economy and health for many years to come. To extract commercially viable amounts of shale gas would require thousands of wells across the Fylde on potentially hundreds of onshore pads. This will have serious implications on both the landscape character of the Fylde, the volume of traffic entering and exiting the Fylde on our tranquil rural lanes and already congested motorway junctions and the actual land and air. Although some short term jobs may be created it would create a much more significant threat to existing agriculture, food and tourism sectors as the Fylde could well become known as a 'large gas field' (Cuadrilla's CEO's own statement). This could alter the public perception of what the Fylde offers and ultimately deter people from investing and visiting the area impacting significantly on local businesses and economy. This is an issue that must be addressed and not left to the County Council alone to determine. The Fylde Local Plan should include enough measures to protect our limited green spaces from industrialisation especially when our urban conurbations continue to expand to meet growing housing and industrial needs. The plan does not seem to address this dichotomy. What are the plans to protect and preserve the green spaces in the very heart of the Fylde i.e. between Preston, Blackpool and Kirkham? What is the vision for the Fylde? Surely Fylde wants to be known for excellent farming and food production and tourism. This is where the large numbers of sustainable jobs will be unlike shale gas extraction which is a 'boom and bust' industry and threatens to spoil the environment and reputation as a 'green' Borough. Look at evidence from the US and Australia to see what damaging impacts fracking has had on local communities. With serious climate change problems surely the Borough should be leading the way and advocating energy efficiencies and expansion of clean, renewable energy solutions and encouraging such planning applications and investment in this sector unlike fossil fuels.

A resident commented that it appears inevitable that shale gas will be exploited in rural Fylde within the next 2 or 3 years, yet the Local Plan has no specific policies that assist with the mitigation of the adverse impacts in terms of environmental and traffic effects on the communities that will be affected. To protect the public and to reduce the concerns over these impacts there should be a raft of control and mitigation measures.

Council response

The council notes a developer's support for the reference in paragraph 1.1 to a 15 year timescale for the Local Plan after its adoption in 2017.

The council notes an Action Group's support for the Local Plan.

The council agrees with Natural England that an additional paragraph be added to the text after paragraph **1.7**, regarding the need to screen a Neighbourhood Development Plan where a Plan could lead to significant environmental effects in relation to the Habitats and Species Regulation (as amended) 2010 (the 'Habitats Regulations') and the Environmental Assessment of Plans and Programmes Regulations 2004.

The council notes an Action Group's preference to plan for development in Newton through the creation of a Neighbourhood Forum, the preparation of a Neighbourhood Development Plan and a subsequent referendum. The council is keen to assist the Action Group in the preparation of a Neighbourhood Plan.

The council notes the objections raised by two residents of Warton that the previous Local Plan (Part 1) Preferred Option document, issued in summer 2013 resulted in the submission of a number of planning applications for residential development. The council cannot prevent developers, landowners or members of the public submitting planning applications for determination, regardless of the stage at which the Local Plan preparation is up to. In November 2014, the council resolved to prepare a single Local Plan, which would combine the Part 1 – strategic policies with the Part 2 element, comprising non-strategic sites, retail and employment boundary reviews and policies on leisure, culture and tourism development. The RPO document comprises the draft single plan for Fylde. The inspector's decision on the Blackfield End Farm Inquiry will need to be taken on board and the additional housing numbers, amounting to 360 new homes, will be added to the overall commitments figure in the next iteration of the Local Plan – the Publication version, which will be issued in summer 2016. The residents claim that the council has still not progressed to the formal adoption of the Bryning with Warton Neighbourhood Development Plan is not accepted by the council. Fylde Council submitted formal comments to the pre-submission stage on 13th August 2014 and a meeting was held to discuss Fylde Council's comments with the Parish Council on 18th August 2014. Consequently, the Submission version of the Neighbourhood Plan was received by Fylde Council. During the six week consultation into the Neighbourhood Plan, 53 representations were submitted – 31 in support, 14 comments and 8 objections. Fylde Council set up a small member working group to meet the Parish Council to discuss concerns and attempt to overcome the objections received during the six week consultation. In December 2015 a number of meetings were held with the Parish Council regarding how to take the Neighbourhood Plan forward after the appeal decision on Blackfield End Farm. The Parish Council wish to proceed with the current version of the Neighbourhood Development Plan.

The council notes the comment made by an Action Group in relation to paragraph **1.8** about 'new homes, jobs and services are located in the most sustainable locations', and the Group's claim that planning application 15/0458 – Land East of Willow Drive, in Wrea Green was approved contrary to this paragraph. The RPO version of the Local Plan has limited weight at the moment, and it is not currently being used by the Development Management Committee when determining planning applications. Once the draft Local Plan reaches the Publication version in summer 2016, it will have gained more weight and it will constitute a

material consideration when determining planning applications. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used regularly in the determination of planning applications across the borough, including Wrea Green.

The council accepts the Home Builders Federation's and three developers recommendation that Fylde Council prepares a draft Statement of Compliance under the Duty to Co-operate, setting out what has occurred to date in terms of joint working on areas of common interest. The Home Builders Federation's concerns that all three Fylde Coast Authorities are committed to meeting their own housing needs within their own boundaries is noted especially in light of the overall housing to be delivered across the Fylde housing market area and how this aligns with the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs over the period 2015 to 2025 LEP Strategic Economic Plan. The council's response to the Home Builders Federation's concerns that the housing needs figure for Fylde needs to align with the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs is set out under policy **H1** (Housing Delivery and the Allocation of Housing Land) in Chapter 10.

Wyre Borough Council's acknowledgement of the success of joint working under the Duty to Co-operate, set out in the Memorandum of Understanding is noted; as is Wyre Council's support for the emerging Local Plan.

The council notes the comments made by an Action Group questioning where Whyndyke Farm fits with the Duty to Co-operate, the Fylde Coast Authorities Joint Member and Officer Advisory Steering Group and joint working with neighbouring local authorities. Joint meetings were held with officers from Blackpool Council and Fylde Council during the consideration of the two outline planning applications for 1,400 new homes at Whyndyke Farm. Joint working between the two authorities resulted in the proposed development including a primary school and a health centre, two local neighbourhood centres, 200 affordable homes and 20 Ha of B2 and B8 employment land. Strategic planning and highway issues are debated at the Fylde Coast Authorities Member and Officer meetings, which are also attended by colleagues from LCC – the Highway Authority.

The council notes a resident's objection that there did not appear to have been cross boundary co-operation with Preston. In actual fact, paragraph **1.18** sets out quite clearly that 'officers from Fylde hold sixth monthly meetings with colleagues from Preston City Council relating to matters of cross boundary concern', including housing developments in North West Preston, the delivery of the Broughton Bypass and the Preston Western Distributor road.

The council notes an Action Group's objection that the Preferred Option version 2013 was ignored and an alternative proposed by the Chairman of the Planning Committee. In actual fact, the sixth option was the Preferred Option which was issued for consultation in summer 2013, following approval by the full Council.

The council notes a resident's concerns about the development of the Preferred Option following consultation on the Issues and Options in June and July 2012. In the council's view the text in paragraph **1.24** is a true representation of the events. There is no need to replace the text with the resident's words: 'The council decided to ignore the majority wishes of those consulted and create a new option, which was not put forward for re-consultation against the other choices. This new option was the basis of the highly flawed Preferred Option document that was subsequently issued for consultation.' The council note the resident's objection to paragraph **1.25** and the claim that this section misrepresents the council's position. The identification of four Strategic Locations for Development in the Preferred Option document was a clear progression of Option 6, which was an amalgamation of some of the aspects of all five alternative options from the Issues and Options stage in spatial terms. The same four Strategic Locations for Development have been progressed in the RPO version, too.

The council notes the objection raised by an Action Group concerning paragraph **1.28** that the proposals in the RPO have already been breached by the approval of planning application 15/0458 and the Group's question: where is the joined up thinking and approach? The text in paragraph **1.28** sets out, in summary, all of the topics and issues covered in the RPO version of the Local Plan. The text in this paragraph is a statement of fact. The council notes the Action Group's objection regarding the cross cutting themes of health, wellbeing and sustainability in the RPO version of the Local Plan, not being considered to date for Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used regularly in the determination of planning applications across the borough, including Wrea Green.

The Council notes an Action Group's objection to the wording in paragraph **1.29**: '... changes to national planning policy ... has informed the Revised Preferred Option'. The council does not accept the Action Group's comment that this suggests that there have been changes to the Framework. There have been no changes to the Framework since its publication on 27th March 2012 and the text does not suggest there has.

The council notes a developer's comments regarding the Technical Assessments – referred to in paragraphs **1.31** and **1.32**, and specifically the Sustainability Appraisal into the RPO version of the Local Plan, which was dated 19th November 2015. The Appraisal was issued for consultation for 6 weeks from 23rd November 2015 to 5th January 2016. The recommendations of the Sustainability Appraisal are being considered in this Responses Report, which will be taken forward in the preparation of the next version of the Local Plan - the Publication version.

The council notes an Action Group's objection to the reference to the Infrastructure Delivery Plan in paragraph **1.34**, in which the Group claimed that they did not consider that the real need for growth had been properly identified. The need for development in terms of housing is dealt with under policy **H1**: Housing Delivery and the Allocation of Housing Land, in Chapter 10.

The council accepts LCC's comment in relation to paragraph **1.40** and **1.41** that it is for Fylde Council to determine the sustainability of permitting a planning application within a Mineral Safeguarding Area (MSA). The council agrees to amend the wording of paragraph **1.40** accordingly. The council notes LCC's comments regarding the need for an assessment of the sustainability of development within the MSA, or to the sustainability of the draft Plan allocating land for housing within the MSA. The council took account of the presence of MSAs when assessing the Strategic sites for inclusion in the RPO version of the Local Plan. **Table 1** (Mineral Safeguarding Areas within Strategic Sites for Development) in the RPO version of the Local Plan identifies three sites: **HSS1**, **HSS8** and **HSS9** which have MSAs – specifically reserves of sand and gravel within their boundaries.

The council notes the comments made by the CPRE – Fylde District, Medlar with Wesham Town Council, Newton with Clifton Parish Council and two residents regarding shale gas exploration, production and distribution, known as 'fracking' – i.e. hydraulic fracturing. Shale gas exploration, production and extraction are only referred to in paragraphs **1.43** and **1.44** of the RPO version of the Local Plan. The impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre-exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area. Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution. Fylde Council is consulted by LCC on planning applications for 'fracking' as a statutory consultee. One of the two residents who wrote in about shale gas asked 'what is the vision for Fylde. Surely Fylde wants to be known for excellent farming and food production and tourism'. The Vision for Fylde is set out in Chapter 3 of the RPO version of the Local Plan.

Recommendations for change

- Add the following new paragraph after paragraph **1.7** and re-number the subsequent paragraph numbers: 'Where a Neighbourhood Plan could lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats & Species Regulations (as amended) 2010 (the 'Habitats Regulations') and the Environment Assessment of Plans and Programmes Regulations 2004. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if it would result in a likely significant effect on any European Site (see Schedule 2, The Neighbourhood Planning (General) Regulations, amended 2015). Therefore reduction and/or avoidance measures may need to be incorporated into the Neighbourhood Plan to ensure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the HRA for the Local Plan. In addition to the HRA process, if environmental effects are predicted a SEA screening exercise should

also be undertaken. A SEA may be required where:

- a neighbourhood plan allocates sites for development
- a neighbourhood plan contains sensitive natural assets that may be affected by the plan
- a neighbourhood plan may have significant effects that have not already been considered and dealt with in the Sustainability Appraisal for the Local Plan.

- The council agrees to prepare a draft Statement of Compliance with the Duty to Co-operate. The Statement of Compliance will be issued in draft alongside the Publication version of the Fylde Local Plan, to enable all neighbouring authorities and '*prescribed*' bodies under Section 33A of the Planning and Compulsory Purchase Act 2004¹ and all other interested parties to comment on this legal requirement through representations.
- Amend existing paragraph **1.40** to read: 'LCC will be consulted on proposals, including planning applications that are likely to prejudice or prevent the future extraction of the minerals within the MSAs, but Fylde Council will determine the planning applications for residential, retail, and commercial developments and changes of use of the land within the MSAs. Three ~~Four~~ of the strategic sites proposed in chapter 7 have MSAs within their boundaries, to a greater or lesser extent.'

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 1 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add a new sub-heading before paragraph **1.7**: 'Neighbourhood Development Plans'
- Amend the third sentence of paragraph **1.7** to read: 'The Bryning with Warton Neighbourhood Development Plan is ~~expected to be adopted in 2015~~ being submitted for examination.'
- Amend the second sentence of existing paragraph **1.28** to read: 'The Plan also identified the distribution ~~and phasing~~ of development over the Plan period to 2032;...'
- Add a new sub-heading: 'Publication version'
- Add a new paragraph after existing paragraph **1.29** and re-number the subsequent

¹ As amended by Section 110 of the Localism Act 2011

paragraphs: 'This Publication version forms the final round of consultation, for comments on the soundness of the Local Plan (see paragraph 1.20 above) and should only be subject to minor changes. The Local Plan will then be submitted to the Secretary of State, along with the representations made on the document and an Examination in Public (EiP) will be held. This will give an independent Planning Inspector the opportunity to test the soundness of the document, in terms of the Local Plan's justification, effectiveness and consistency with national policy. Once the Local Plan is found 'sound' by the Planning Inspector it will be adopted by the council as part of the Development Plan for Fylde.'

- Amend existing paragraph **1.32** to read: 'The results of the previous technical assessments have been used to update and enhance the Local Plan during its preparation. The consultants preparing the Sustainability Appraisal report have been working with the cCouncil officers during the preparation of the Local Plan. These assessments have been undertaken throughout the preparation of the Local Plan and the results and recommendations of these ~~2015~~ technical assessments have been used to inform this ~~Revised Preferred Option~~ Publication version.' ~~The results from the 2015 technical assessments will be fed into the next version of the Local Plan, which will be the Publication version.'~~
- Delete the sub-heading: ~~'The Policies Map'~~
- Delete existing paragraph **1.35** as the Policies Map will accompany the Publication version of the Local Plan: ~~'References are made throughout the plan to items being defined, designated or identified on the Policies Map. The Policies Map will be prepared to accompany the next version of the Local Plan – i.e. the Publication version. For the purposes of this Revised Preferred Option version of the Local Plan, proposed development sites are identified on a number of inset maps, which are to be found at the back of this document.'~~
- Amend **Table 1** to include the correct site references: '**HSS1, HSS8 and HSS9**'

Chapter 2: Spatial Portrait of Fylde

Chapter 2: Spatial Portrait of Fylde

Number of representations:

Comment	Support	Object	Total
10	3	26	39

Representations received from:

- Blackpool Council
- Bryning with Warton Parish Council
- Treales, Roseacre and Wharles Parish Council
- Blackpool, Fylde and Wyre Trades Union Council
- Canal and River Trust (formerly British Waterways)
- 1 Developer
- 1 Action Group
- 1 Resident

What you said

Blackpool Council commented that paragraph 2.23 should also refer to rail linkages. The sub-regional importance of the Fylde-Blackpool Periphery in employment terms should be emphasised more strongly (its importance is emphasised later in the Plan) in the Spatial Portrait, including reference to the good motorway access. Reference should be made in the Spatial Portrait to the need for close co-operation and joint working with Blackpool Council and Blackpool communities to ensure that development proposals on the Fylde-Blackpool Periphery take account of, and benefit, both Boroughs. The mosslands are a key feature of part of the Fylde-Blackpool Periphery and could also be referred to in the Spatial Portrait.

Blackpool, Fylde and Wyre Trades Union Council welcomed new development in Fylde, including new homes and jobs, but commented that school and education would be an issue. The shortage of school places is mentioned in paragraph 2.26 but this seems to have been ignored in paragraphs 2.29 and 2.30. New housing will bring a need for schools in other areas as well and this is acknowledged in criterion g) of policy M1: 'Masterplanning the Strategic Locations for Development'. The Fylde has a stable education system with a family of schools co-operating well together. The planning of new schools will need great care so that this balance is not upset and that the new schools open and expand at exactly the right times as the population grows. The new schools should certainly be community schools under democratic control and not academies or free schools, or that balance will definitely be upset, as well as bringing to the Fylde all the disadvantages of those types of school when these have been avoided in the Fylde so far.

A developer commented that within the 'Key Characteristics' sections of the Spatial Portrait, there are a number of statements that are very contextual in terms of time frame and should

be reconsidered, or at least repositioned within the Local Plan where they can support the specific policies. The developer claims that the 'Key Characteristics' sections are perhaps a little too detailed.

Paragraph 2.2

An Action Group commented that whenever a planning application comes up for approval, it is never on Grade 2 nor even mainly Grade 3a agricultural land. The Action Group questioned if this meant either the overall assessment was incorrect or that individual land evaluations were suspect; or that this land designation was either ignored or said to be of 'no consequence' – when will this practice stop?

Paragraph 2.7

An Action Group objected to the omission of the Green in Wrea Green from the list of historic attractions in Fylde.

Paragraph 2.9

An Action Group objected to the population figures for Fylde, questioning what leads to the estimation and why is it higher than Lancashire generally? Where is a cross reference to the supporting data to the estimation?

Paragraph 2.11

An Action Group commented on the paragraph on 'Deprivation' claiming that there are already problems with getting doctors, which will just get worse.

Paragraph 2.15

An Action Group questioned where the proof was that the Lancashire Advanced Engineering and Manufacturing Enterprise Zone at BAE Systems, Warton is even minimally successful?

Paragraph 2.23

An Action Group agreed with the statement that 'This local area is well served by public transport and well connected to Blackpool and Preston by bus. However, connections to Kirkham town centre and rural areas are relatively infrequent.' The Action Group went on to question why this is never used when evaluating planning applications.

Paragraph 2.24

An Action Group questioned what was being done to address the issue that 'housing in Lytham and St Annes is considered to be the least affordable in the Borough and the need for affordable housing is therefore greatest compared to the rest of the Borough.' The Action Group commented that placing affordable homes in the countryside, as part of housing market approvals was contrary to this need.

Paragraph 2.36

An Action Group questioned whether the text in this paragraph referring to Blackpool Airport was up-to-date.

Paragraph 2.37

An Action Group questioned what was being done to improve access for people with limited mobility at Squires Gate Railway Station; and for train passengers to access Blackpool Airport.

Paragraph 2.38

An Action Group questioned what was being done to assess the viability of managing the sand dunes as the main front line sea defence, whilst also determining the requirement for a second defence line set back at Clifton Drive, south of Squires Gate.

Paragraph 2.42

An Action Group requested that the word 'significant' needs adding before residential development, in terms of development in Warton.

Paragraph 2.43

An Action Group questioned the relevance of this paragraph as both BAE Systems and the Land Registry are talking of reducing employment. There would appear to be an excess of affordable housing in Warton and the suggestion of highly paid employment at BAE Systems does not support the requirement for additional affordable housing.

Paragraph 2.45

An Action Group commented that the take-up of net employment opportunities at the Enterprise Zone at BAE Systems, Warton has been extremely poor.

Paragraph 2.47

*Bryning with Warton Parish Council commented on paragraph **2.47** 'Development should be phased to allow for necessary infrastructure to be provided.' In the absence of any 'necessary' infrastructure following the 800 approved residencies in Warton, clarity as to at which point the start of such phasing is generated would be welcomed. It has been clearly recognised in the Plan that Warton does not benefit from the community facilities and local services necessary.*

An Action Group commented that a supply of market and affordable housing is happening and to excess. There is little evidence of either phasing or of any infrastructure improvements as far as Wrea Green is concerned.

Paragraph 2.50

A resident supported the approach taken by the council avoiding land at risk of flooding (Land north and east of Kirkham has both Flood Zones 2 and 3).

Paragraph 2.52

An Action Group questioned what the presence of the development at Mill Farm would do to town centre shopping in Kirkham. This does not appear to have been considered.

Paragraph 2.54

An Action Group commented that there was nothing in the plan relating to poor access at Kirkham and Wesham Railway Station. There is mention of secure parking later in the Local Plan, but nothing is defined on this.

Paragraph 2.55

Treales, Roseacre and Wharles Parish Council commented that the reference in paragraph 2.55 to Ribby Hall Village is more correctly associated with 'Rural Areas' than 'Kirkham and Wesham'.

Paragraph 2.59

An Action Group objected claiming there was nothing in the plan, nor is there evidence through approved applications, that an adequate supply of affordable housing was being considered or that the necessary infrastructure was being provided other than mere wording.

A resident supported the approach taken by the council avoiding areas at high risk of flooding (Land north and east of Kirkham has both Flood Zones 2 and 3).

Paragraph 2.62

Consultation by Treales, Roseacre and Wharles Parish Council with local farmers indicates that energy crop activity, referred to in paragraph 2.62 is marginal, restricted to only one or two locations.

The Parish Council recommended inserting the following text in paragraph 2.62:

Paragraph 2.62a 'The rural areas are predominated by pasture land and associated use in support of the extensive agricultural based supply chain, principally of SMEs. In addition there is an extensive network of livery businesses and their associated supply chains. This primarily rolling countryside is interspersed with woodland which supports wildfowl, raptors

and large wildlife, including deer. The land is also used seasonally by migrating wildfowl. This provides sporting and leisure opportunities.'

Paragraph 2.62b 'The landscape creates the backdrop for rural attractions. Tourism facilities exist across the rural area, including static and mobile caravan sites. Leisure infrastructure of hostleries, including in the rural settlements, supported by public rights of way and the cycle network all add to the amenity.'

Paragraph 2.62c 'This landscape also creates an attractive residential and retirement location, with an infrastructure of churches, award-winning schools and community halls and social clubs. The re-use of redundant farm buildings for residential property has created demand for an on-going local service supply chain for the new residents.'

Paragraph 2.62d 'Active investment continues in the core pasture based agricultural sector. The well-established game shooting industry continues.'

Paragraph 2.62e 'The Boys Brigade Regional Training Centre south of Treales Village, attracts national and international visitors to the area, as well as providing local sports and meeting facilities to the local community.'

Paragraph 2.62f 'Ribby Hall Village is the largest single rural area employer, with several hundred people employed directly on the site, supported by an extensive, even bigger local supply chain. Local, Regional, National and International visitors add to local spend in leisure and high street businesses across the Fylde, Blackpool, Wyre and beyond.'

Paragraph 2.63

An Action Group objected to 'the provision of affordable housing is a significant issue throughout the rural areas, with demand outstripping supply' in the paragraph. According to the Housing Needs Survey and subsequent planning approvals, Wrea Green has a 15 year supply of affordable (taken as socially rented) homes in the pipeline and 50% are being constructed elsewhere due to pre-planning negotiations.

Paragraph 2.65

An Action Group objected claiming that the words 'public transport provision in the rural areas is poor' in paragraph 2.65 was never recognised when approving planning applications in rural areas.

Paragraph 2.66

Treales, Roseacre and Wharles Parish Council recommended inserting the following text in paragraph 2.66:

Paragraph 2.66a 'The prospect of Heavy Industrial Shale Gas development in the rural areas and rural lanes would reduce the attractiveness of these areas and adversely affect house prices and health deprivation.'

An Action Group objected to the fact that more and more large detached homes are being approved in Wrea Green when 'Singleton and Wrea Green have the lowest proportion of homes in the lowest tax band which suggests larger properties.'

Paragraph 2.67

Treales, Roseacre and Wharles Parish Council recommended inserting the following text in paragraph 2.67:

Paragraph 2.67a 'Proposals for the introduction of heavy industrial activities arising from shale gas development would have a significant effect on the rural character and intrinsic value of the countryside. Government surveys evidence that Public support for Shale Gas is at an all-time low at 21% and 54% of people who know about Shale Gas development object to it. This would have a significant adverse effect on the attractiveness of the area for leisure, retirement, residential, adversely affecting the local supply chains and the mobility of residents whose life choices would be more limited due to deterioration in property values and their assets should they need to move to areas with later in life care facilities. The Local Plan should protect the rural area and ensure that heavy industry is directed to where the area has invested in infrastructure appropriate to support its development and to protecting the environment and the public.'

Paragraph 2.67b: 'The introduction of shale gas would involve significant risk mitigation monitoring and enforcement activities, including those at a FBC and LCC level, adding to the cost base and adversely affecting health and well-being amenity.'

An Action Group objected claiming that more housing in Wrea Green would not be sustainably located, nor did the 2014 Appeal Inspector or previous Fylde Council planning assessments. However, planning application 15/0458 was still approved.

Figure 3

*The Canal and River Trust (formerly British Waterways) welcomed the recognition given to the Lancaster Canal in **Figure 3: Local Assets and Key Designations**.*

Figure 4

*An Action Group questioned why recognised rising water tables in east Fylde and surface water run-off were not shown on **Figure 4**?*

Council response

The council agrees with Blackpool Council that paragraph 2.23 should include a reference to rail linkages. The council agrees with Blackpool Council that the Local Plan should emphasise the sub-regional importance of the Fylde-Blackpool Periphery in employment terms and the good motorway access in paragraph 2.33. The council considers that co-operation and joint working with Blackpool Council are covered thoroughly in chapter 1 and do not need to be repeated in chapter 2. The council agrees with Blackpool Council that the mosslands of the Fylde-Blackpool Periphery are a key feature and reference will be made to them in paragraph 2.38.

The council agrees with the Blackpool, Fylde and Wyre Trades Union Council that the shortage of school places mentioned in paragraph **2.26** should be followed through in paragraph **2.30**. The Trades Union Council's comment on the preference for community schools over academies or free schools is noted.

The council notes a developer's comment that within the 'Key Characteristics' sections of the Spatial Portrait, there are statements that are very contextual and detailed, which should be reconsidered or re-positioned where they could support specific policies. The council disagrees with the developer that text within the 'Key Characteristics' section should be reconsidered or re-positioned. The wording used in the 'Key Characteristics' section sets the context for all five local areas that are defined and described in the Spatial Portrait.

The council notes the support given by the Canal and River Trust (formerly British Waterways) to the inclusion of the Lancaster Canal in **Figure 3**.

The council notes comments made by Bryning with Warton Parish Council and an Action Group on paragraph **2.47** regarding the phasing of necessary infrastructure. The council will delete all references to the phasing of development in the Local Plan as it is contrary to the Framework.

The council agrees with the comment submitted by Treales, Roseacre and Wharles Parish Council that the reference in paragraph **2.55** to Ribby Hall Village is more correctly associated with 'Rural Areas' than 'Kirkham and Wesham' and it should be moved to the Key Characteristics section of 'Rural Areas'.

The council agrees with the text recommended by Treales, Roseacre and Wharles Parish Council for paragraph **2.62** in terms of the agricultural economy except for the text relating to the Boys Brigade (recommended paragraph **2.62e**).

The council notes the recommendations made by Treales, Roseacre and Wharles Parish Council, for the insertion of additional text in paragraphs **2.66** and **2.67** regarding the impacts of shale gas development. The council cannot insert the text on shale gas production in the Spatial Portrait in the Local Plan. Shale gas exploration, production and extraction should only be referred to chapter 1 of the RPO version of the Local Plan because Fylde Council is not the Mineral or Waste Planning Authority for the area. Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution.

The council noted the Action Group comment on the omission of the Green in Wrea Green from the list of historic sites in paragraph **2.7**. However, the council does not consider the Green in Wrea Green to be an historic attraction in the same way that Lytham Hall or Lytham Windmill are. The council noted the comments made by an Action Group to paragraph **2.2** regarding the lack of planning applications on Grade 2 or 3a agricultural land, but this is evidenced by the planning register; together with the Action Group's questioning of the population figures in Fylde in paragraph **2.9**, which are based on the 2011 census data. The council also noted the Action Group's comments regarding problems accessing doctors in paragraph **2.11**, which is not considered to constitute 'Deprivation'. The council

notes the Action Group's comments regarding the success or otherwise of the Enterprise Zone at BAE Systems in Warton in paragraph **2.15** and **2.45**, which will be monitored over time. The Council notes the comment made by the Action Group agreeing with the sentences in paragraphs **2.23** and **2.65**, public transport to rural areas being relatively infrequent, but questioning why this is never used when evaluating planning applications – which appears to be a comment regarding planning permissions granted over the years in Wrea Green. The council noted the Action Group's comments regarding a statement in paragraph **2.24** and questioning what was being done to deliver affordable housing in Lytham and St Annes - affordable housing provision is dealt with under policy **H4** in Chapter 10. The council noted the comments made by the Action Group regarding Blackpool Airport in paragraph **2.36** – which are still up-to-date. The council noted the Action Group's concerns about improved access for people with limited mobility at Squires Gate Railway Station and for train passengers accessing Blackpool Airport identified in paragraph **2.37** – in reply, policy **T3**: 'Enhancing Sustainable Transport Choice' includes improvements to the North Fylde Line and South Fylde Line including the stations and policy **T2**: 'Blackpool Airport' includes improvements to public access to the airport. The council noted the Action Group's comments regarding sand dune management at Clifton Drive, referred to in paragraph **2.38** – this whole issue is dealt with in detail in the Fylde Council Sand Dune Management Plan. The council agrees with the Action Group's request for the word 'significant' to be inserted before 'residential development, in relation to Warton in paragraph **2.42**. The council notes the Action Group's comments regarding paragraph **2.43** and questioning whether 'additional affordable housing is required' in Warton. The council notes the Action Group's comments regarding the potential impact the Mill Farm Development will have on Kirkham town centre, referred to in paragraph **2.52**. Paragraph **2.52** comprises part of the Spatial Portrait of the borough; any impacts the Mill Farm development will have on Kirkham town centre will be covered in future retail assessments. The council notes the Action Group's concerns about improved access at Kirkham and Wesham Railway Station identified in paragraph **2.54** – in reply, policy **T3**: 'Enhancing Sustainable Transport Choice' includes improvements Kirkham and Wesham Railway Station and to the North Fylde Line and South Fylde Line. The council agrees with the Action Group to delete the reference to the phasing of development in paragraph **2.59**. The council notes the Action Group's objection to the following wording in paragraph **2.63**: 'the provision of affordable housing is a significant issue throughout rural area', basing the objection on planning permissions in Wrea Green. The Fylde Coast SHMA provides evidence that the provision of affordable housing is a significant issue in rural areas. The net annual affordable housing need is 25 homes per annum for the rural areas. The council notes the Action Group's objection to paragraph **2.67** claiming that more housing in Wrea Green would not be sustainably located, which appears to be a comment regarding planning application (15/0458).

The council notes the Action Group's questioning the omission from **Figure 4** of rising water tables in east Fylde and surface water run-off. The council is concerned that the data depicted on **Figure 4** is actually out of date. The available information on flooding is currently being updated rapidly by the Environment Agency following the recent storms. Consequently, it is considered that **Figure 4**: Areas of Risk of Flooding in Fylde should be deleted from the plan and be replaced by a hyperlink to the Environment Agency's website.

The council notes a resident's support for the approach taken by the council to avoid land at risk of flooding (Land north and east of Kirkham) in paragraphs **2.50** and **2.59**.

Recommendations for change

- Amend paragraph **2.23** to read: '... well connected to Blackpool and Preston by bus and rail.'
- Amend the first sentence of paragraph **2.29** to read: 'The Local Plan should provide for an appropriate housing mix including the provision of affordable housing ~~and phased development to allow for necessary infrastructure to be provided~~.'
- Amend the first sentence of paragraph **2.30** to read: 'New development will need to be ~~phased throughout the plan period~~ planned and delivered comprehensively to allow for the provision of primary and secondary education, transport, social and the Green Infrastructure network ...'
- Amend paragraph **2.33** to read: 'The Fylde-Blackpool Periphery is of sub-regional importance in employment terms. At present, the majority of existing industrial / business units and new employment opportunities are located at Whitehills. Key employers in this area include the Department for Work and Pensions, located at Peel Park, in close proximity to Junction 4 of the M55.'
- Add a new sentence at the end of paragraph **2.38** to read: 'The mosslands are a key feature of the Fylde-Blackpool Periphery'.
- Amend the first sentence of paragraph **2.42** to read: 'Warton has been the subject of significant residential development proposals in recent years.'
- Delete the following sentence from paragraph **2.47**: '~~Development should be phased to allow for necessary infrastructure to be provided~~.'
- Amend paragraph **2.55** to read: 'Tourism and sporting facilities are provided at Ribby Hall Village where there may be the potential for future investment and enhancement.' Move paragraph **2.55** to the Key Characteristics section under 'Rural Areas'.
- Delete the last sentence in paragraph **2.59**: '~~Development should be phased to allow for necessary infrastructure to be provided~~'.
- Delete the existing wording in paragraph **2.62**: '~~Agriculture and agricultural diversification (including energy crops), is an important industry for the Fylde rural economy, despite undergoing considerable change in recent years. Other key employment uses located in the rural areas include Universal Products at~~

~~Greenhalgh, Westinghouse (Salwick), near Clifton and Ribby Hall Village between Wrea Green and Kirkham.~~ and replace with the following text: 'The rural areas are predominated by grazing land and associated uses in support of the extensive agricultural based supply chain, principally of SMEs. In addition there is an extensive network of livery businesses and their associated supply chains. This primarily undulating countryside is interspersed with woodland which supports wildfowl, raptors and large wildlife, including deer. The land is also used seasonally by migrating wildfowl. This provides sporting and leisure opportunities. The landscape creates the backdrop for rural attractions. Tourism facilities exist across the rural area, including static and mobile caravan sites. Leisure infrastructure of hostelries, including in the rural settlements, supported by public rights of way and the cycle network all add to the amenity. This landscape also creates an attractive residential location, with an infrastructure of churches, award-winning schools and community halls and social clubs. The re-use of redundant farm buildings for residential property has created demand for local services for the new residents. Active investment continues in the grazing / dairy based agricultural sector. The well-established game shooting industry continues. Ribby Hall Village is the largest single rural area employer, with several hundred people employed directly on the site, supported by an extensive, even bigger local supply chain. Local, Regional, National and International visitors add to local spend in leisure and high street businesses across the Fylde, Blackpool, Wyre and beyond.'

- Delete **Figure 4: 'Areas of Risk of Flooding in Fylde'** and replace it with a hyperlink to the Environment Agency's website.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 2 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Delete the following words from the last sentence of paragraph **2.22**: ~~'...which will accompany the Publication version of the Local Plan.'~~
- Amend the last sentence of paragraph **2.36** to read: '... a proposed Enterprise Zone at Blackpool Airport, which was ratified on 1st April 2016.
- Amend the last sentence of paragraph **2.44** to read: 'Services focused on a local retail centre will be needed for ~~the new community~~ Warton within the lifetime of the Local Plan.
- Amend the last sentence in paragraph **2.58** to read: '...in line with the council's Regeneration Framework, 2015-2032.'

- Amend paragraph **2.60** to read: 'The rural areas include the **Tier 1: Larger Rural Settlements** of ~~Elswick~~, Newton, Staining and Wrea Green; and **Tier 2: Smaller Rural Settlements** of Clifton, Elswick, Singleton and Weeton. A large proportion of land within the Borough falls within the rural areas. Land south of Newton and Clifton is in a high flood risk area.'
- Amend the first sentence in paragraph **2.65** to read: 'Public transport provision in the rural areas is ~~poor~~ limited.'

DRAFT

Chapter 3: The Local Plan's Vision for Fylde

Chapter 3: The Local Plan's Vision for Fylde

Number of representations:

Comment	Support	Object	Total
6	2	5	13

Representations received from:

- Highways England
- Home Builders Federation
- Canal and River Trust (formerly British Waterways)
- Lancashire County Council
- Blackpool Council
- Treales, Roseacre and Wharles Parish Council
- 1 Developer
- 1 Action Group
- 3 Residents

What you said

The Home Builders Federation was generally supportive of the Vision. The reference to '...boosting the delivery of sustainable homes and employment growth ...' was particularly welcomed.

Highways England commented that the Vision has been significantly amended although the overall focus remains the same. Priority is given to focusing housing and employment growth within the four Strategic Locations for Development and support is also given for the delivery of urban extensions. The sub-regional importance of the Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems, Warton and Whitehills Business Park for employment remains and with further elaboration provided on the goals for the sites, which are to create an energy hub, with a cluster of energy based companies and amenities; supported by an energy logistics park and Blackpool airport, with the aim of delivering employment close to where people live to facilitate a reduction in the need to travel long distances. The Vision now specifically refers to, 'employment opportunities will have increased and diversified through the development of the Lancashire Advanced Engineering and Manufacturing Enterprise Zone, at BAE Systems'. Reference to improvements to the strategic road network have been significantly amended and further detail is referred to. However, overall it is still consistent with the previous Vision text. References to the vision for sustainable transport and improvements to public transport services and facilities generally remain the same.

Lancashire County Council commented that, it is stated that 'congestion on the A585 trunk road will have been resolved through the delivery of the Blue Route'. It is considered that this statement should not be scheme specific and reference to the Blue Route should be deleted. (For further information please refer to the Fylde Coast Transport Masterplan). The Fylde Coast Highways and Transport Masterplan sets out the intention to undertake a study into improving facilities at stations on the North Fylde railway line including accessibility and parking at Kirkham, and a study into a rail/bus/train interchange on the South Fylde line. The timescales for these studies is set out in the Masterplan and they will be able to feed into the Local Plan process at that stage.

Blackpool Council welcomed the references in the Vision to developing closer working relationships with the adjoining Fylde Coast Authorities and references to opportunities for sub-regional employment at Whitehills and the provision of an energy hub close to Blackpool Airport.

The Canal and River Trust (formerly British Waterways) welcomed the reference in the Vision to protected and enhanced public rights of way networks, footpaths, cycleways and bridleways but considered that this could usefully be expanded to include reference to canal towpaths which could play an important role in the provision of such facilities.

Treales, Roseacre and Wharles Parish Council objected to the Vision as there was no reference to the rural economies and in particular the agricultural component. A statement such as the following should be included in the Vision: 'The rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced. The diversity of countryside, agricultural and leisure economies that exist there will thrive, through support for local supply chains, in particular SMEs and effective enforcement of policies that protect the intrinsic value of the countryside.' The implications of this statement should then flow through the Local Plan document.

Treales, Roseacre and Wharles Parish Council considered that the economic development section of the Vision seemed very vague. It would be better to state: 'The Fylde will have sustained and attracted further high value knowledge and skills-based careers. The aerospace industry will continue to provide a spearhead of world-class critical capacity and capability (See LCC Skills Action Plan and LCC Strategic Economic Plan). Investment in the regional and local offers will have paid dividends in retaining and attracting aerospace and related AEM employment.'

Treales, Roseacre and Wharles Parish Council objected that there was no evidence presented that supports: 'Fylde will have an energy hub, generating a cluster of energy based companies to support energy businesses on the Fylde Coast.' There has been a world-wide supply chain for energy for decades. Fylde companies already address this. The aviation support activities at Blackpool Airport to service the offshore wind and gas industry are well established. The geographical aspects of the marine off-shore support industry are principally located around Heysham. Fleetwood proposes further development. Neither of these fall within Fylde's remit. There is no evidence presented why companies would elect to locate additionally in the Fylde. Even Cuadrilla have already shown that their preference is to locate in Central Lancashire. Commodity based economies are highly sensitive to external

conditions outside the control of the area. Is this an activity that fits within the Fylde vision? What is the evidence base for an energy hub? Arup have assessed in the Roseacre Wood and Preston New Road applications that shale gas produces a total of 11 equivalent jobs during the exploration and appraisal site throughout the national/international supply chain. LCC indicate that few of these jobs will be sourced locally. The introduction of heavy industrial activity in the rural areas will have adverse impacts on the amenity and other economies of these areas.

Treales, Roseacre and Wharles Parish Council commented that if shale gas development is assumed to be in the rural areas, then this needs to be included in all references about impacted other components of the economy including the visitor, residential, retirement, leisure, food production and inward investment economies. If the Fylde area is prospectively less attractive and less healthy than other areas, then stakeholders will select other choices. It is not apparent that FBC has commissioned its own up-to-date research to assess the impacts. Alternatively, would exploration and appraisal hub (fracking) sites be encouraged at the Blackpool Enterprise Zone site or other Fylde locations on the coast? Is Blackpool Council supportive of this or would they prefer to encourage exploration and appraisal site development within their own authority boundary? This needs clarifying in the Vision and reflected through the analysis and conclusions in the Local Plan.

A developer was generally supportive of the Vision. However, the developer claimed that as drafted, the Vision was unsound because it had not been positively prepared. The importance of delivering new housing in sustainable locations across the Borough is understated and is inconsistent throughout the Plan. The developer considers that reference should be made to Tier 1: Larger Rural Settlements representing sustainable locations for growth within the overall Vision for the Borough. Accordingly, the developer suggested the following amended wording: '...have continued to develop as a dynamic, prosperous place to live and work through boosting the delivery of new homes and employment growth within all of the four Strategic Locations for Development and in the Tier 1: Larger Rural Settlements.'

An Action Group objected that this was the council's Vision and questioned why there had not been some prior consultation. Given the current position with BAE Systems, Warton, Blackpool Airport and Westinghouse Springfields, the Action Group considered that these had been 'over-egged' in relation to employment and as a result showed a far higher need for housing than is warranted. The Action Group questioned where the Local Care Services are to come from, which have been in the Wrea Green draft Neighbourhood Plan for 4 years, but nothing has been done? The Action Group objected to the level of development in Wrea Green, which does not support the Vision of having housing developed close to employment. The Action Group claimed that this had been said (and ignored) over and over again. The Action Group commented that rural settlements are already losing their individual identities due to excessive development for profit, not need.

A resident was glad to see a commitment to more and enhanced cycle ways, but the plan must be more precise as to what a cycleway is. A white line is not a cycleway and the plans must be fit for purpose, meet cycling needs and provide protection for cyclists. Current

strategies fail in all of these and this plan must be more than words and generalities and must show a definition of a cycleway.

Another resident commented on the paragraph in the Vision referring to the provision of outdoor sports facilities being rather weak and non-specific. Over a number of years, the public courts at Fairhaven Lake have been almost abandoned by Fylde Council. The resident claims that the result is a facility that is an eyesore and has an element of danger because of the poor surface condition. The resident considered that the Vision sounded like a wish list.

Another resident commented that the Vision was misleading; and that it was clearly a wish list, which was not properly constructed. The Vision should be a series of clear discrete and numbered requirements. Policies should be clearly linked to the Vision and it should be clear how a policy and associated plans or series of policies and plan will result in achievement of the Vision. Responsibility for successfully implementing policies and plans and achieving the Vision should be specifically assigned to council committees or groups of committees. It should be clear from reading the Plan exactly what the Vision means and how the Plan will ensure that it is met.

Council response

The council notes the Home Builders Federation's and Blackpool Council's support for the Vision and Highways England's comments on the changes in the text between the Preferred Option and the Revised Preferred Option.

The council notes the comments made by LCC regarding highway and public transport schemes and the reference to the Blue Route in the Vision. The reference to the Blue Route will be amended with the addition of the wording 'formerly known as the Blue Route'. All of the highway and public transport schemes in the Vision are repeated in detail policies **T1**, **T2** and **T3** and the supporting text in Chapter 12 and are followed through in the Infrastructure Delivery Plan and the Delivery Schedule, which accompany the Local Plan.

The council notes the Canal and River Trust's (formerly British Waterways) support for the Vision and agrees that reference should be made to canal towpaths in the paragraph referring to the public rights of way network.

The council agrees with Treales, Roseacre and Wharles Parish Council over the need for additional text in the Vision referring to rural communities and the agricultural economy. However, the council disagrees with the Parish Council's claim that the economic section of the Vision is very vague. The economic section runs clearly through the first four paragraphs of the Vision. The council noted the Parish Council's questioning of the evidence base for an energy hub or an energy logistics park. The Local Plan needs to be up-to-date and refer to the latest innovations in technology – paragraph **9.8** in Chapter 9 sets out more detail on the energy hub. A full response to the Parish Council's comments about the energy hub is set out in Chapter 9. The council cannot insert the text on the impacts which shale gas production could have on Fylde in the Vision in the Local Plan. Shale gas exploration, production and extraction only needs to be referred to chapter 1 of the RPO version of the Local Plan because the impacts of Shale Gas exploration are unknown. There are counter

arguments for and against shale gas exploration. The industry is in a pre-exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area. Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution and the impacts upon the environment.

The council notes but does not accept a developer's claim that the Vision is unsound and that reference should be made to boosting the delivery of new homes and employment growth in the 'Tier 1: Larger Rural Settlements' as well as the four Strategic Locations for Development. The council addresses the issue of the settlement hierarchy and development locations for Fylde in detail in chapter 6. The council's development strategy comprises the development of strategic sites at the four Strategic Locations for Development; and the development of non-strategic sites (for between 10 and 99 homes) in the four Strategic Locations for Development and on the edge of the Tier 1: Larger Rural Settlement of Newton and on the edge of the Tier 2: Smaller Rural Settlement of Clifton. It is this development strategy which appears in the Vision. The council considers that the development of strategic sites in the Tier 1: Larger Rural Settlements would not constitute sustainable development.

The council notes the comments made by an Action Group regarding existing and approved developments in Wrea Green. Once the draft Local Plan, including the Vision, is adopted in spring 2017 it will be used in the determination of planning applications across the borough, including Wrea Green.

The council notes the comments made a resident regarding cycleways. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Plan (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

The council notes the comment made by a resident that the provision of outdoor sports facilities is weak and non-specific. The evidence for outdoor sports facilities is currently being revised through the provision of a new Playing Pitch Strategy, which will include a Built Facilities Review, together with an updated Open Space, Sport and Recreation Study. These studies and strategies will be available in summer 2016, for inclusion in the Publication version of the Local Plan.

The council does not accept a resident's comments that the Vision is misleading, nor that it is a wish list. The resident's suggestion that responsibility for successfully implementing policies and plans and achieving the Vision should be specifically assigned to council committees or groups of committees is already taking place. Every iteration of the draft Local Plan from Issues and Options to the current RPO have been approved by council and the document will be adopted by the Full Council in spring 2017.

Recommendations for change

- Amend the Vision to include the following wording: ‘and congestion on the A585 trunk road will have been resolved through the delivery of the M55 to Fleetwood Corridor Improvements (formerly known as the Blue Route).’
- Add the following wording to the paragraph in the Vision on the public rights of way network: ‘Additional footpaths, cycleways, bridleways and canal towpaths ...’
- Add the following text after the paragraph on the public rights of way network: ‘The rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced and the rural economy will thrive, in particular small and medium sized enterprises.’

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 3 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph 3.3 to read: ‘A Vision for Fylde was included in the Issues and Options, ~~and in the Preferred Option~~ and the Revised Preferred Option consultation documents. The Vision in this Publication ~~version in this Revised Preferred Option document~~ includes minor additions and re-ordering of the text, reflecting comments received in response to those consultations, the recommendations of the Sustainability Appraisal report and other technical documents.’
- Amend the Vision to include the following wording: ‘... close to Blackpool Airport Enterprise Zone,’

Chapter 4: The Strategic Objectives for Fylde

Chapter 4: The Strategic Objectives for Fylde

Number of representations:			
Comment	Support	Object	Total
9	3	16	28

Representations received from:

- Highways England
- Home Builders Federation
- Treales, Roseacre and Wharles Parish Council
- CPRE – Fylde District
- 3 Developers
- 1 Action Group
- 1 Resident

What you said

The Home Builders Federation was generally supportive of the strategic objectives.

Highways England supported the strategic objectives and the amendments made to the sub-objectives.

A developer supported, in principle, the five strategic objectives set out at 4.1 of the RPO version of the plan. The developer considers that these principles will help create the living environment which is synonymous with the attractiveness of the Borough. In particular they support the intention that development should be located in sustainable locations, primarily within the four Strategic Locations for Development. The developer supported the intention to maintain, improve and enhance the environment and believe their development throughout the Borough achieve this objective; and is always willing to work with all interested parties to deliver schemes which enhance the environment. The developer has worked and continues to work with Lancashire County Council to deliver the M55 to Heyhouses Link Road in order to reduce traffic congestion, through their strategic development site at Queensway. The developer supported the strategic objective of diversifying and growing the local economy, and have over many years brought forward employment sites in key locations in the Borough. However, the developer considered the council must take into account the fact that some areas of the Borough are no longer attractive to employers, and should be prepared to allow such sites to be utilised for alternative uses. The council should accept that to attract new business requires high quality locations which will be attractive to new investment, and not sites with little or no presence in the market place.

A resident objected claiming that the Strategic Objectives should be specifically related to the Vision in Chapter 3. The resident commented that there is no clear relationship between the Vision and the Strategic Objectives. The resident objected to paragraph 4.2 claiming it is simply incorrect to claim that the Strategic Objectives can be used to measure progress against the Vision. The resident requested that paragraph 4.3 be deleted as it simply repeats the wording in the previous paragraphs. The resident also requested that paragraph 4.4 be deleted as it adds nothing that has not already appeared or will appear in the next section.

A resident objected that if sustainability is the over-arching objective as set out in paragraph 4.5 and all other Strategic Objectives are there to support it then the others should not be billed as Strategic Objectives since, in the event of a conflict they must be overruled.

An Action Group objected commenting that within Wrea Green, so much development has been approved which is not sustainable, so it is too late to attempt to achieve this over-arching objective.

Strategic Objective 1: To create sustainable communities

Treales, Roseacre and Wharles Parish Council commented that the introduction of Shale Gas Development in the rural areas would be in conflict with Strategic Objective 1.

A developer commented that paragraph 4.6 of Strategic Objective 1 should be amended to include reference towards directing development to all sustainable settlements within the district, including Tier 1: Larger Rural Settlements.

Two developers questioned the wording in paragraph 4.6, which introduces Strategic Objective 1 and says: 'Previously developed land will be used in preference to greenfield land and the quality of the openness of the Green Belt will be retained.' The Framework does not give preference to the use of previously developed land before greenfield. Paragraphs 17 and 111 of the Framework encourages the effective use of land by re-using land that has been previously developed. To apply a sequential approach to the release of land for development is therefore, contrary to national policy. The focus of Framework is on the delivery of housing overall. Whilst the developer supports the use of previously developed land, the reference to prioritisation should be removed. The council itself recognises the need to allocate a significant amount of housing development on greenfield land; therefore, there is clearly not a preference for development on previously developed land. Accordingly, for consistency with the Framework it was suggested the wording of the Strategic Objective be amended as follows: 'The use of previously developed land should be encouraged. The quality of the openness of the Green Belt and Areas of Separation be retained.'

An Action Group objected claiming that Strategic Objective 1(2), (3) and (4) are not currently being applied in Wrea Green and it is now too late to attempt to achieve this Strategic Objective.

A resident objected to paragraph 4.6 claiming this section does not adequately define sustainability (principally it fails to address transport, road and drainage infrastructure). The reference to prioritising previously developed land for development is not reflected in any of

the council's behaviour or planning, current or past. What percentage of development to 2032 will the Plan require to be on previously developed land?

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

A developer is generally supportive of Strategic Objective 2 as it is consistent with the key principles of the Framework. However, sub-objective 12 of the Strategic Objective refers to retaining the identity, character and setting of the rural settlements. It is inevitable that any future growth in the rural settlements will alter the character of villages, particularly in terms of size and scale. Sub-objective 12 of the Strategic Objective as drafted could be interpreted as restrictive towards any future development in these settlement. Policy S1 of the RPO document states development that is appropriate to the scale and character of the settlements at each level of the settlement hierarchy will be supported in accordance with the Development Strategy. The council has provided no evidence or justification on what constitutes 'appropriate scale'. It is therefore the developer's view that this part of the Strategic Objective should be amended as follows: 'Development will have regard to the identity, character and setting of the rural settlements.'

An Action Group objected claiming that Strategic Objective 2(2), (6), (7) and (8), (11) and (12) are not being applied in Wrea Green and it is too late to attempt to do so.

A resident objected to Strategic Objective 2 claiming that protecting existing areas of Green Belt and Areas of Separation without critical review is poor planning. The Green Belt in Freckleton in particular has had a substantial effect on the development of that Service Centre and is difficult to justify against normal Green Belt criteria.

Strategic Objective 3: To make services accessible

CPRE – Fylde District supports the encouragement of a modal shift away from car use as set out in Strategic Objective 3 (1). Missing from strategic objective 3 (3) is the provision of a park-and-ride scheme for Kirkham and Wesham railway station. (But it is included in policy T3 Enhancing Sustainable Transport Choice.) Such a scheme is needed to encourage increased rail use and to relieve the problem of rail passengers parking in local residents' space.

A developer is supportive of Strategic Objective 3, as it supports the protection and provision of public transport, key services and facilities in Tier 1: Larger Rural Settlements, through the allocation of new housing development. This is consistent with paragraph 28 of the Framework.

An Action Group objected claiming that Strategic Objective 3(1) is not being applied now in Wrea Green and it is too late to attempt to do so; Strategic Objective 3(2) recent approvals in Wrea Green, so far from the centre, will increase this issue – it was said in objections and duly ignored; Strategic Objective 3(3) what about Kirkham and Wesham Railway Station; Strategic Objective 3(4) what further can be done; Strategic Objective 3(5) surely this from the M55 to Heyhouses has already been secured as part of the appeal approval at Queensway; and Strategic Objective 3(6) the A585 comes through Wesham and Kirkham to

the A583 – how are the numerous planning approvals in this area going to do anything other than increase traffic congestion?

A resident objected to Strategic Objective 3 claiming that the objectives are a jumble of associated factors with no clear guidance as to how they will be prioritised in conflict with each other or sub-objectives under another Strategic objective heading. The reference to doctor's surgeries is misleading. The location of surgeries within Fylde is very insensitive to development. The council should talk to the local practices. The substantial increase in the size of Warton will lead to an increase in resources at the Freckleton and Lytham health centres but will not lead to a surgery or dispensing chemist in Warton and the council has absolutely no influence in this anyway.

Strategic Objective 4: To diversify and grow the local economy

CPRE – Fylde District commented that Strategic Objective 4 should include a reference to Blackpool Airport Enterprise Zone.

CPRE – Fylde District strongly supported the protection of agricultural and farming operations as set out in Strategic Objective 4 (10), but highlighted that there was no actual rural economy policy in the Local Plan to support this objective.

Treales, Roseacre and Wharles Parish Council noted that there was no reference to energy in the Strategic Objective 4, so there was an inconsistency. The introduction of Shale Gas Development in the rural areas would be in conflict with Strategic Objective 4.

A developer supported the council's aspirations to develop the local economy and meet local employment needs.

An Action Group objected questioning how Strategic Objective 4(1) and (3) are to be achieved; Strategic Objective 4(7) what about the effects of Fracking? Where is the planning for Fracking? Strategic Objective 4(11) what about Wrea Green generally?

A resident objected claiming that only Strategic Objective 4(2) is within the delivery control of the council and, even there, it depends on a level of understanding of the changing trends in business in the Borough and elsewhere that the council has not yet ever achieved. Strategic Objective 4(6), (7), (8) and (9) are largely incompatible and certainly in conflict with no indication of what principles will apply to the resolution of conflict. The resident claims that Strategic Objective 4(10) is ridiculous - the council has no plan to safeguard farming in the Fylde (or market gardening); it has clearly demonstrated that the preservation of agricultural land in agricultural use is not a serious consideration.

Strategic Objective 5: To develop socially cohesive, safe, diverse and healthy communities

Treales, Roseacre and Wharles Parish Council commented that the introduction of Shale Gas Development in the rural areas would be in conflict with Strategic Objective 5.

A developer supported the council's aspirations to develop socially cohesive, safe, diverse and healthy communities as it is consistent with the Framework.

An Action Group objected claiming that Strategic Objective 5(1) is not currently performed but ignored and has now alienated most of the rural population. The Action Group questioned how Strategic Objective 5(6) is to be achieved; matters have got so much worse in the last few years the position is no longer recoverable. The Action Group claimed that Strategic Objective 5(8) is not done as part of the current process, although it has been raised time after time for Wrea Green; to attempt to recover the position later is not effective.

A resident objected to the wording in Strategic Objective 5(1) which was claimed to be untrue. The resident was interested to see the council's justification of this statement against its record.

Council response

The council notes the Home Builders Federation's support for the strategic objectives and Highways England's comments and support on the changes in the text to the sub-objectives between the Preferred Option and the Revised Preferred Option.

The council notes the support of a developer for the strategic objectives, together with the comment that some areas of the Borough are no longer attractive to employers, and such sites should be prepared to be utilised for alternative uses. The council accepts that to attract new business requires high quality locations which will be attractive to new investment. The council considers that the developer's concerns are already addressed through the existing wording in Strategic Objective 4: To diversify and grow the local economy, especially sub-objective 4(2): 'Making provision for high quality and readily available sites in sustainable locations that will facilitate the growth of existing local firms and be attractive to new inward investment, including high technology uses.'

The council notes a resident's objection that the strategic objectives should be specifically relate to the Vision. Paragraph 4.3 clearly sets out: 'the five strategic objectives set out how the Vision can be achieved. They express the purpose of the Local Plan and what the Development Strategy aims to achieve.' Consequently, paragraph 4.3 should be retained. The council does not accept the resident's comment regarding paragraph 4.2 that it is simply incorrect to claim that the strategic objectives can be used to measure progress against the Vision. Paragraph 4.2 says: 'these strategic objectives are important as they will be used as a basis to measure the success of the Local Plan in achieving the Vision', not to measure progress against the Vision as stated by the resident. The council disagrees with the resident's comment that paragraph 4.4 should be deleted. Paragraph 4.4 sets the national policy context for the strategic objectives confirming that 'in line with the Framework, the objectives, policies and proposals contained in the Local Plan are underpinned by the presumption in favour of sustainable development'. The council agrees with the resident that paragraph 4.5 should be deleted because if sustainability is the over-arching objective and all other strategic objectives are there to support it then the other strategic objectives could be overruled.

The council notes the comments made by Treales, Roseacre and Wharles Parish Council that the introduction of shale gas development in rural areas would be in conflict with Strategic Objectives 1, 4 and 5. The impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan. Fylde Council will be consulted by LCC on any planning applications for shale gas development, which will be considered against the strategic objectives and policies in the Local Plan.

The council notes but does not accept a developer's comment that paragraph **4.6** of Strategic Objective 1 should be amended to include reference towards directing development to all sustainable settlements within Fylde, including Tier 1: Larger Rural Settlements. The council addresses the issue of the settlement hierarchy and development locations for Fylde in detail in chapter 6. The council's development strategy comprises the development of strategic sites at the four Strategic Locations for Development; and the development of non-strategic sites (amounting to between 10 and 99 homes) in the four Strategic Locations for Development and on the edge of the Tier 1: Larger Rural Settlement of Newton and on the edge of the Tier 2: Smaller Rural Settlement of Clifton. It is this development strategy which appears in the Vision. The council considers that the development of strategic sites in the Tier 1: Larger Rural Settlements would not constitute sustainable development.

The council agrees with two developers and a resident over the wording in paragraph **4.6** which gives preference to the use of previously developed land before greenfield. The council agrees that the wording needs amending as the application of a sequential approach to the release of land for development would be contrary to national policy as set out in the Framework.

The council notes the comments made by an Action Group regarding Strategic Objective 1(2), 1(3) and 1(4), Strategic Objective 2(2), 2(6), 2(7), 2(8), 2(11) and 2(12), Strategic Objective 3(1), 3(2), 3(3), 3(4), 3(5) and 3(6), Strategic Objective 5(6) and 5(8) claiming that the sub-objectives are not being applied in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including Wrea Green.

The council notes a resident's objection to paragraph **4.6** claiming that this section did not adequately define sustainability, in that it failed to address transport, road and drainage infrastructure. There is no need to define sustainability in paragraph **4.6** as sustainable development is set out in paragraph **1.5** of Chapter 1; sustainability is one of five cross cutting themes that runs through the Local Plan; and transport, road and drainage infrastructure are addressed in Chapter 12 which focusses on 'Infrastructure, Service Provision and Transport' and in the accompanying Infrastructure Delivery Plan.

The council notes a developer's support for Strategic Objective 2 and agrees that the existing wording of sub-objective 2(12) is restrictive towards any future development in rural settlements and needs to be amended accordingly.

The council notes a resident's objection to Strategic Objective 2 claiming that protecting the existing areas of Green Belt and Areas of Separation without critical review is poor planning. It was resolved by the council when it embarked on preparing a new development plan that 'no strategic review of the Green Belt within Fylde will be undertaken when preparing the Local Plan, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies' (paragraph 8.6 of the RPO). Areas of Separation are proposed new designations in the Preferred Option and the RPO versions of the Local Plan; they are not existing entities. Further information on Green Belts and Areas of Separation are set out in Chapter 8.

The council notes CPRE – Fylde District's support for the encouragement of a modal shift away from car use as set out in Strategic Objective 3(1) and agrees with the need to insert a reference to the provision of a park and ride scheme for Kirkham and Wesham railway station.

The council notes a developer's support for Strategic Objective 3 which supports the protection and provision of public transport, key services and facilities.

The council notes a resident's objection to Strategic Objective 3, in which the resident claims that the sub-objectives (1-6) are a jumble of associated factors with no clear prioritisation; and the resident claims that the council needs to talk to local doctors surgeries about access to healthcare. The council disagrees with the resident's objections. The sub-objectives listed in Strategic Objective 3 are mirrored in Transport policies **T1**, **T2** and **T3** in Chapter 12 of the Local Plan and in Section 2 (Transport Section) of the Infrastructure Delivery Plan (IDP) and the Delivery Schedule at the back of the IDP. The council is in communication with doctors through the quarterly meetings of the Fylde and Wyre Clinical Commissioning Group (CCG). The council consulted the CCG on the draft IDP and received up-to-date text which was incorporated in the Health and Social Care section of the IDP (section 7), prior to consultation in October 2015.

The council agrees with CPRE – Fylde District that Strategic Objective 4 should include a reference to Blackpool Airport Enterprise Zone. The council notes CPRE – Fylde District's support for Strategic Objective 4(10). The rural economy is covered by policy **GD4** – 'Development in the Countryside' in Chapter 8.

The council notes a developer's support for Strategic Objective 4 and the aspirations to develop the local economy and meet local employment needs.

The council notes an Action Group's comments about how Strategic Objective 4(1) and 4(3) will be achieved. They will be achieved through the policies in Chapter 9 (The Fylde Economy) of the Local Plan. The council notes the comment regarding Strategic Objective 4(7) that the introduction of shale gas development in rural areas would affect tourism and the visitor economy. In terms of the Action Group's comments regarding 'fracking', shale

gas exploration, production and extraction only needs to be referred to chapter 1 of the RPO version of the Local Plan and not in the Strategic Objectives because the impacts of Shale Gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre-exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan. Fylde Council is not the Mineral or Waste Planning Authority for the area. Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution and the impacts upon the environment, tourism and the visitor economy.

The council notes a resident's objection to Strategic Objective 4(2) and the council's ability to make provision for high quality and readily available sites in sustainable locations. The RPO version of the Local Plan includes both policies and maps of land allocations identifying high quality and readily available sites for development in sustainable locations.

The council notes a developer's support for Strategic Objective 5 and the aspiration to develop socially cohesive, safe, diverse and healthy communities, consistent with the Framework.

The council notes an Action Group's and a resident's objections to the wording in Strategic Objective 5(1) 'Engaging and empowering local communities to be involved in local matters that shape their areas', which the Action Group and the resident claimed was untrue. The council considers that the Localism Act and the development of Neighbourhood Planning have enabled local communities to be involved in local matters.

The council notes the resident's objection that 'developing a distinctive image of the borough as a business location' 4(6), 'maximising the potential of the visitor economy' 4(7), 'promoting the image of the classic resort of St Annes' 4(8) and 'promoting the continuing improvement of the vitality and viability of the town, district and local centres' 4(9) are incompatible and in conflict. The council notes the resident's objection that Strategic Objective 4(10): 'supporting and protecting agricultural and farming operations, and appropriate diversification as a key element of the rural economy' is ridiculous. The council notes the resident's claim that it has clearly demonstrated that the preservation of agricultural land in agricultural use is not a serious consideration. In response, policy **GD1** in Chapter 8 includes the following wording: 'The significant loss of the best and most versatile agricultural land outside settlement boundaries will be resisted unless it is necessary to deliver development allocated in the Local Plan, or for strategic infrastructure'.

Recommendations for change

- Delete paragraph **4.5** and re-number the subsequent paragraph accordingly: ~~'The Local Plan contains an over-arching objective that all new development will be sustainable. The remaining objectives contribute to achieving this primary objective'.~~
- The third sentence of paragraph **4.6** should be amended to read: 'The use of previously

developed land ~~will be used in preference to greenfield~~ should be encouraged. ~~and~~
The quality of the openness of the Green Belt ~~will be maintained~~ and Areas of Separation will be maintained’.

- Amend **Strategic Objective 2(12)** to read: ‘Development will have regard to the ~~Retaining the~~ identity, character and setting of the rural settlements’.
- Amend **Strategic Objective 3(3)** to include the following text: ‘...including improved pedestrian access, together with the provision of a park and ride at Kirkham and Wesham Railway Station...’
- Amend **Strategic Objective 4(6)** to include the following text: ‘... Lancashire Enterprise Zone at Warton, Blackpool Airport Enterprise Zone and Whitehills Business Park’

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 4 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend **Strategic Objective 2(10)** to read: ‘Supporting the Ribble Coast and Wetlands Regional Park Plan and the delivery of actions identified in the Coastal Strategy.’
- Amend **Strategic Objective 3(5)** to read: ‘Encouraging the delivery of the M55 to Heyhouses (St Annes) Link Road and the M55 to Fleetwood Corridor improvements ~~Norcross Link Road~~ (i.e. formerly known as the Blue Route).’

Chapter 5: National and Sub Regional Policy

Policy NP1: Presumption in favour of sustainable development

Number of representations:			
Comment	Support	Object	Total
1	1	1	3

Representations received from:

- Highways England
- 1 Action Group
- 1 Developer

What you said

*Highways England commented that some minor amendments had been made to policy **NP1** but none are considered to be of any particular concern.*

*A developer supported policy **NP1** which mirrored the 'Model Policy' issued by the Planning Inspectorate for use by LPAs in applying the presumption in favour of sustainable development, expressed in the National Planning Policy Framework (i.e. the Framework). The developer supported the need for high quality sustainable development.*

*An Action Group commented that the presumption in favour of sustainable development, in paragraph **5.4** is being ignored and that any attempt to recover the position is just not feasible for Wrea Green.*

Council response

The council notes the comments made by Highways England and the support given to policy **NP1** by a developer.

The council disagrees with the comments made by an Action Group that the presumption in favour of sustainable development is being ignored by Fylde Council. Planning applications for development in Wrea Green and across the borough are approved if they accord with the development plan and the Framework, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework or the Local Plan; or specific policies in the Framework or the Local Plan indicate that development should be restricted. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including at Wrea Green.

Recommendations for change

- None

Additional recommendations for change

The following additional change is proposed to clarify and update the existing text in Chapter 5 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the second sentence in paragraph **5.3** to read: 'Necessary infrastructure, which is needed to deliver the proposed level of growth development in the Local Plan, will be provided in a timely fashion.'

Chapter 6: The Development Strategy

Chapter 6: General Comments

Number of representations:			
Comment	Support	Object	Total
3	5	13	21

Representations received from:

- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- 1 Action Group
- 1 Landowner
- 1 Resident

What you said

Paragraph 6.3

A landowner objected to the council's decision ruling out the prospects of Green Belt review. The Council have failed to consider the most appropriate means of identifying suitable sites to meet identified needs. In this respect it is clear that the failure to review Green Belt boundaries and to consider allocation of sites on the edge of the principal settlements will not result in the identification of the most suitable and crucially importantly the most sustainable forms of development. It is considered that there ought to be a limited review of Green Belt boundaries and that the land east of West End Lane, Warton, ought to be removed from the Green Belt and instead allocated for housing to meet identified needs.

An Action Group objected claiming the proposed Area of Separation between Wrea Green and Kirkham has already been reduced to accommodate a planning application. The Action Group does not expect that the future will be any different if it is expedient to do so.

A resident objected claiming there is an urgent need for a strategic review of Green Belt allocation in the Borough. What is the justification for claiming that there is no need?

Paragraph 6.5

An Action Group claimed that planning applications for new homes had already been approved on non-sustainable sites in Wrea Green, so how can it be believed that this will not continue.

A resident objected to paragraph 6.5 claiming that the SHLAA 2015 update, which did not become available for consultation, can only have reached the stated conclusion on the basis of a housing requirement figure. The housing requirement figure has not been presented for consultation yet and is widely held to be wrong (far too high).

Paragraph 6.6

Treales, Roseacre and Wharles Parish Council commented that paragraph 6.6 should include the following text: 'Shale gas development involves High Volume Hydraulic Fracturing ('fracking'), which in turn involves Horizontal directional Drilling. DECC states in their best practice that horizontal drilling has also allowed the operator to choose drilling locations away from environmentally sensitive areas. In the UK, this has been demonstrated to be at distances of 11km and world-wide even farther between target geologies and surface works. Should 'fracking' eventually be evidenced to be a safe process, before this hydrocarbon source is superseded, such that the industry in the Fylde might proceed, then surface sites can be located at sites where industry requirements of highways, utilities and environment and public health safety has been planned and invested in. This will avoid adverse impacts including noise, visual intrusion and highway safety.' This will avoid the contamination of other economies within Fylde Borough by heavy industrial processes such as fracking.

A landowner supported paragraph 6.6 which relates to locating development, and in this instance that the overall strategy for directing where new development and investment will be located in Fylde is set against the backdrop of underlying development trends. It involves providing for new homes, employment, services, tourism, renewable energy and the infrastructure that supports them. Development must be achieved in the most sustainable way in order to protect and, where possible, enhance Fylde's historic, environment, social and economic assets. The landowner supported the principles as set out in the preceding paragraphs as they accommodate the thrust of the Framework and the development it seeks. Through including the principles within the emerging Local Plan, it should ensure the right development takes place in the right location.

An Action Group questioned where the information is regarding the required need and therefore the split of housing needs? This needs to be defined as part of this plan. This approach has already been ignored for Wrea Green, despite it having been raised time and time again in objections.

Paragraph 6.7

An Action Group objected claiming there was nothing in the plan to support the improvement in Public Transport. The Action Group claimed that this has just not been done for Wrea Green and it is now too late.

A resident objected claiming the Infrastructure Delivery Plan (IDP) is too late, as is the Local Plan. Location of development has been effectively outside any planning control for some years. The funding and planning of infrastructure have failed to anticipate development.

Paragraph 6.8

An Action Group objected to paragraph 6.8: 'the size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development. The Action Group claimed that this has just not been done for Wrea Green and it is now too late.

A resident objected claiming that Strategic Objectives 1 to 5 inclusive are not achieved in the development of Strategic Locations for Development in Chapter 6. The resident claimed that just saying stuff does not make it true. There is no indication in this document that the council is taking this very seriously.

Cross Cutting Themes in Chapter 6

A resident objected questioning if the council could explain how it intended to police the Cross Cutting Theme: 'Achieving Good Design'. The resident claimed that some of the housing recently put up in the Borough has been of poor quality and poorly built; this objective should be linked to some positive change in the way the council operates to ensure it does not happen again.

A resident objected to 'Viability' being a cross cutting theme in the Plan without identifying the actions needed to be taken to ensure that it happens. It is clearly not happening now. Saying it should happen is not a plan.

Council response

Paragraph 6.3

The council notes a landowner's and a resident's objections to the council's decision not to carry out a Green Belt review. It was resolved by the council when it embarked on preparing a new development plan that 'no strategic review of the Green Belt within Fylde will be undertaken when preparing the Local Plan, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies' (paragraph 8.6). Areas of Separation are proposed new designations in the Preferred Option and the RPO versions of the Local Plan. Further information on Green Belts and Areas of Separation is set out in Chapter 8.

The council notes an Action Group's objection that planning permission has already been granted within the Area of Separation between Wrea Green and Kirkham. All of the comments and objections regarding Areas of Separation are dealt with under policy **GD3** in chapter 8.

Paragraph 6.5

The council notes an objection from an Action Group regarding existing planning approvals for new homes on non-sustainable sites in Wrea Green. The Action Group appears to be

focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including Wrea Green.

The council notes an objection from a resident regarding the SHLAA 2015 update and the Housing Requirement Figure. All of the representations received on the housing figures are dealt with under policy **H1** in Chapter 10.

Paragraph 6.6

The council notes the recommendations made by Treales, Roseacre and Wharles Parish Council, for the insertion of additional text in paragraph **6.6** regarding the impacts of shale gas development. The council cannot insert the text on shale gas production in the Development Strategy in the Local Plan. Shale gas exploration, production and extraction only needs to be referred to chapter 1 of the RPO version of the Local Plan because Fylde Council is not the Mineral or Waste Planning Authority for the area. Lancashire County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution.

The council notes a landowner's support for paragraph **6.6** which should ensure the right development takes place in the right location.

The council notes an Action Group's questioning of where the information is regarding the required need and split of housing needs. All of the representations received on the housing requirement needs are dealt with in Chapter 10.

Paragraph 6.7

The council notes an Action Group's claim that there was nothing in the Local Plan to support improvements in public transport. Strategic Objective 3 sets out six sub-objectives to make services accessible, a number of which relate to public transport improvements. Policy **T3** in Chapter 12 focusses on enhancing sustainable transport choice, primarily public transport; and Section 2 of the Infrastructure Delivery Plan includes bus services, rail services, Blackpool Airport, cycling infrastructure and public rights of way, footpaths and bridleways. The Delivery Schedule at the back of the IDP includes a list of public transport projects, mirroring the schemes set out in the Fylde Coast Highways and Transport Masterplan.

The council notes a resident's objection claiming the Infrastructure Delivery Plan is too late and that the funding and planning of infrastructure have failed to anticipate development. All of the representations received on the Infrastructure Delivery Plan are dealt with in that section of the Responses Report (please see the table of contents on page 1).

Paragraph 6.8

The council notes an objection from an Action Group that ‘the size and connectivity of existing places, along with the level of services available, are key considerations in deciding where to locate development’ has just not been done for Wrea Green and it is now too late’ appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including Wrea Green.

Cross Cutting Themes in Chapter 6

The council notes a resident’s objections to the cross cutting themes relating to ‘Achieving Good Design’ and ‘Viability’. These two cross cutting themes are followed up by policy **GD7**: ‘Achieving Good Design in Development’ and the requirements of a Design and Access Statement (10 pointers to good practice) set out in **Figure 5** in Chapter 8 and Performance Monitoring Indicator 5 in Appendix 8: ‘Performance Monitoring Framework’, and policy **GD8**: ‘Demonstrating Viability’ which is dealt with in Chapter 8. The council notes the resident’s objection that Strategic Objectives 1 to 5 are not achieved in the development of the four Strategic Locations for Development. The creation of sustainable communities; the maintenance, improvement and enhancement of the environment; making services accessible; diversifying and growing the local economy; and developing socially cohesive, safe, diverse and healthy communities are all fundamental components of the delivery of new homes, jobs and recreation within the four Strategic Locations for Development.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to be made to clarify and update the existing text in the opening paragraphs of Chapter 6, to reflect the level of development proposed in the Local Plan.

Additional textual changes

- Delete the word ‘~~growth~~’ and replace it with ‘development’ in paragraphs **6.2**, **6.7**, **6.8** and **6.13**.

Policy S1: The Proposed Settlement Hierarchy

Number of representations:

Comment	Support	Object	Total
7	5	5	17

Representations received from:

- Highways England
- Wyre Borough Council
- Bryning with Warton Parish Council
- 4 Landowners
- 6 Developers
- 1 Action Group
- 3 Residents

What you said

Highways England supported the overall approach of policy S1. However, the location of some settlements in relation to the Strategic Road Network could inevitably be problematic depending on the level of development focussed in those settlements and the implications for supporting transport infrastructure. Further comment in relation to such issues is provided in relation to the policies that allocate specific locations for development.

Wyre Borough Council noted the proposed development strategy set out in policies S1 and DLF1. The Strategy as a whole is not likely to have significant implications for Wyre Borough. The main cross boundary consideration is the northern most parts of Fylde. Policy S1 sets out that growth within the rural areas will be restricted to the Tier 1 and Tier 2: Larger and Smaller Rural Settlements, which include Singleton and Elswick. These two settlements are located close to the Local Authority boundary and growth here may have implications for Wyre, in particular infrastructure provision. The main rural settlement in Wyre that may be affected is Great Eccleston.

Bryning with Warton Parish Council commented on the wording in policy S1: 'Warton will have improved services including shops and community facilities when development set out in the Warton Strategic Location for Development has taken place.' All of the extensive residential development for Warton outlined in the plan, to 2032, has now been approved, additional housing to that proposed is already exceeding the outlined figures. Yet there has been no improvement, or proposals for such, for additional supporting retail services, other than approval of the extension of the convenience store at Townsends garage planning application, likewise any community facilities and it is hard to envisage these changes within

the time frame especially without the proactive and energetic support from the Borough, immediately, to drive these improved services forward.

A landowner supported the inclusion of Whitehills as a Local Service Centre in the proposed Settlement Hierarchy. Whitehills is a diverse, mixed-use community on the periphery of the Blackpool urban area. It benefits from excellent connectivity to Blackpool, to the wider region and national motorway network via the M55 and to Lytham St Annes via the committed M55 / Heyhouses Link Road. It is consequently an important sub-regional location and a sustainable and suitable area for significant mixed housing, employment and commercial (leisure / retail) growth. There is demonstrable market interest from residential developers and commercial investors, and the area offers a very good prospect of delivering successful housing and employment growth to help meet objectively assessed needs in Fylde.

A landowner objected claiming that Kirkham and Wesham should not be separated within the proposed settlement hierarchy and should be considered jointly as a Key Service Centre. In spatial planning terms Kirkham and Wesham is to be regarded as a single settlement. There is no discernible difference between Kirkham and Wesham and the area has always been treated as a single settlement. They are separated only by a railway line, share a railway station and are designated as one town centre in the adopted Local Plan. Paragraph 2.17 of the consultation document acknowledges that Kirkham and Wesham is effectively one settlement, grouping both towns together as a 'local area'. As such, there is no reason why Kirkham and Wesham should be treated within the settlement hierarchy as anything other than a combined settlement area. In the rural areas, Policy S1 states that development will be restricted to the Tier 1 and Tier 2: Rural Settlements identified in the policy text. The rural settlements identified have excluded Treales, Wharles and Little Eccleston which were previously identified as small villages under Policy SD1 of the former Preferred Option consultation document (June 2013). Indeed the Local Plan also identified the settlements of Treales, Wharles and Little Eccleston as locations where development would be permitted. Policy S1 of the RPO has also downgraded Clifton, Singleton and Weeton from 'Rural Villages', essentially Tier 1, to Tier 2: Rural Settlements in the revised policy. It is considered that the villages of Treales, Wharles and Little Eccleston should be reintroduced to the settlement hierarchy as Tier 2: Smaller Rural Settlements. Furthermore, Planning Practice Guidance on 'Rural Housing' states that 'all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.' As such, the Council should not automatically rule out development within, or adjacent to, rural settlements not identified within the hierarchy. Outside of Tier 1 and 2: Rural Settlements, it is requested that the development of previously developed land is added to the list of exceptions. The Framework makes allowances for the development of previously developed land within the Green Belt. As such, there should be no reason why previously developed land cannot be redeveloped within the countryside areas.

A landowner supported the inclusion of Elswick as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy is supported. Elswick is a sustainable village and a suitable location for growth, providing a number of essential local community services and facilities

including a church, village hall, equipped play and outdoor sports area, convenience store and post office, 2 public houses, café, fish and chip shop, estate agency and children's nursery. There are regular bus services in the village connecting it to Blackpool and St Annes. It is a popular village and an attractive residential area. This is evident in the recent interest in the village by Story Homes on land at Mill Lane.

A landowner supported the inclusion of Newton as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy. Newton is a sustainable village and a suitable location for growth and provides a number of essential local community services and facilities including a primary school, village hall and sports field, a post office and convenience store, public house and regular public transport connections to Kirkham, Lytham and Preston. It is a popular village and an attractive residential area for both working families and retired and older people, and there is a very good prospect of new housing development being delivered in the short term.

*A landowner supported the identification of Staining as a Tier 1: Larger Rural Settlement within the Settlement Hierarchy as it confirms Staining as a sustainable community and location for future development. Justification in paragraph 6.12 conflicts with Policy **S1** and **DLF1** which allows windfall and small site developments by suggesting 'Affordable housing of an appropriate scale within a rural settlement, to meet a particular local need, may be justified in accordance with the Framework'. This is incorrect in relation to the Framework as one of the core planning principles is ensuring thriving rural communities (Framework paragraph 17) which will require development that meets all needs of the existing and future community. The Framework requires planning policies to support economic growth, which includes housing development, in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development (paragraph 28). In addition the Framework makes specific provision for rural exception sites on sites which would not normally be used for housing contrary to policy **S1** and **DLF1**. The statement is conflicting and needs to be removed as it is unnecessarily restrictive and no similar justification to the level of development has been included within the justification Key Service Centres and Local Service Centre. Such an approach if adopted would also be counterproductive to the objectives of the plan and deter sustainable development as it fails to reflect the fact that affordable housing is predominantly delivered as part of market housing development (as is the case in all recent developments in Staining).*

A developer endorsed the council's general approach to its Development Strategy that proposes a Settlement Hierarchy and Strategic and Non-strategic Locations for Development that are required to accommodate the level of growth in new homes, jobs and associated services across Fylde during the entire plan period. It is considered that the principles of this approach are consistent with the Framework and associated guidance within the Planning Practice Guidance (PPG), specifically paragraph 47 of the Framework that seeks to significantly boost the supply of housing and to identify key sites which are critical to the delivery of the housing strategy over the plan period.

*A developer supported policy **S1** which proposes to categorise of Kirkham as a 'Key Service Centre' along with Lytham (including Ansdell) and St Annes. Over the Plan period the role of the Key Service Centres will be to provide a range of housing and employment opportunities,*

as well as retail and other services to serve the towns and wider catchment area. As the site at Kirkham Triangle is located within one of the three Key Service Centres, its residential development will wholeheartedly comply with the objectives of the RPO.

A developer supported the inclusion of a settlement hierarchy to inform new development across Fylde, together with the identification of Wrea Green and Elswick as 'sustainable communities' that can accommodate future housing growth. Wrea Green and Elswick both benefit from local amenities and facilities that meet the day to day needs of the local community. Both rural settlements are served by local bus services which connects the settlements to other Key and Local Service Centres within the Borough, and Blackpool and Preston beyond. Notwithstanding this, paragraph 6.12 of the justification section for Policy S1 states: 'Outside of Key Service Centres and Local Service Centres, there are Tier 1: Larger Rural Settlements and Tier 2: Smaller Rural Settlements. Affordable housing of an appropriate scale within a rural settlement, to meet a particular local need, may be justified in accordance with the Framework.' The wording of this paragraph suggests that development within Tier 1: Larger Rural Settlements is restricted to affordable housing only, and only then where this is justified. Paragraph 15 of the Framework states that policies in the Local Plan should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. Policy S1 refers to Tier 1: Larger Rural Settlements as sustainable locations for growth. The Council has not produced any sound evidence to suggest that development within these settlements should be restricted to affordable housing only.

A developer supported the attempts of Fylde Council to meet its full objectively assessed needs for market and affordable housing in accordance with the requirements of the National Planning Policy Framework. However, it is considered that prior to the publication of the next stage of the plan that the LPA carry out a review of its Objectively Assessed Need prior to the submission of the plan to the Secretary of State to ensure that the Objectively Assessed Need is robust and up-to-date. The developer also agree with the designation of Wrea Green as a Tier 1: Larger Rural Settlement. Wrea Green provides a range of local services and employment opportunities to meet day to day needs of residents, and sustainable transport links between Blackpool and Preston are available from the village. This site is also accessible to the strategic highway network, and is also located in close proximity to the services that are available in other nearby settlements. As such, it is considered that Wrea Green is a suitable location for some additional housing growth.

A developer objected to Warton being within the settlement hierarchy category of 'Local Service Centres' and claimed that Warton should be included within the 'Key Service Centres' category. As currently drafted the settlement hierarchy is unsound. Warton should be reclassified as it is a 'significant settlement' (paragraph 2.3) and is the location of the 'internationally and nationally significant Lancashire Enterprise Zone at BAE Systems' (paragraph 2.43). This designation will enable the creation of 'net additional employment opportunities' (paragraph 2.45) over and above the significant existing employment at Warton, which the plan confirms suffers from 'high levels of commuting to the BAE Systems site' (paragraph 2.44). The plan seeks to 'provide for an adequate supply of market and affordable housing' to meet locally arising needs and the forecast requirements the increased employment will create (paragraph 2.47). 'Strategic Development' is envisaged as

part of the plan strategy for Warton. There is a plan objective to create a new shopping and neighbourhood centre for the settlement (policy EC4). All of these matters create an important role for Warton as a significant settlement in Fylde over the plan period, and this should be reflected in the settlement hierarchy set out in the plan.

A developer generally supported the development strategy of the draft local plan and that the Settlement Hierarchy in policy S1 will ensure that the majority of new development will be in sustainable locations. However, it is considered that 'Whitehills' should be upgraded to the status of Key Service Centre in policy S1. It is the main employment area of the Borough and with the exception of Queensway, the main focus for housing. The amount of development being proposed should mean it is seen as being of equal importance to Lytham, St Annes and Kirkham. The developer also considers that Wrea Green should be upgraded to be a Local Service Centre. Its location in the Borough makes it an important focus for the area and it has the potential for further growth. It serves not only its own community but also outlying areas as well. It therefore performs the role of a Local Service Centre.

A developer supported the inclusion of Staining as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy. Staining is a sustainable village and a suitable location for growth, and provides a number of essential local community services and facilities including a primary school, pre-school nursery, village hall and sports field, St Luke's church, convenience store, shops, public house and public transport connections. It is a popular village and an attractive residential area for both working families and retired and older people, and there is a very good prospect of new housing development being delivered in the short term as the strong market interest and take up of the schemes at Castle Lane and Chain Lane demonstrates.

An Action Group questioned where were the opportunities for local employment to salaries which match house prices? For Wrea Green affordable housing (socially rented) already well exceeds the requirements per the Housing Needs Survey, so where was this requirement in the last 2 years?

A resident objected claiming that Warton is not a Local Service Centre by the council's definition since the only rural settlement located close to Warton with fewer facilities is Wrea Green, which is some miles from Warton (along a road that is not served by public transport) is Wrea Green which is just across the road from Kirkham, the Borough's market town. Nobody comes from Wrea Green (or Freckleton or Lytham) to shop in Warton. The idea that there is anything strategic about the Council's approach to Warton and its development (or indeed the wishes of its citizens) is risible.

Council response

The council notes Highways England's support for the approach taken in policy S1 (The Proposed Settlement Hierarchy), which was a new policy in the RPO version of the Local Plan. The council also notes Highways England's comment that the location of some settlements in relation to the Strategic Road Network could inevitably be problematic depending on the level of development focussed in those settlements and the implications

for supporting transport infrastructure. Highways England's comments on individual sites will be presented and addressed under policies **SL1** to **SL4** in Chapter 7.

The council notes Wyre Borough Council's comments that development in Elswick and Singleton, located close to the local authority boundary may have implications in particular infrastructure provision; and that the main rural settlement in Wyre that may be affected is Great Eccleston. The scale of development in Elswick is dealt with under paragraphs **7.77** and **7.86** in Chapter 7. Paragraph **7.82** says that: 'A site has been allocated for 15 homes in Singleton. Fylde Council is minded to approve the planning application.'

The council notes Bryning with Warton Parish Council's comments on the wording in policy **S1** regarding improved services including shops and community facilities when development set out in the Warton Strategic Location for Development has taken place. The council is willing to work with Bryning with Warton Parish Council to facilitate the provision of these improved services. However, the council disagrees with a developer's objection that Warton should be included within the 'Key Service Centres' category. There are insufficient services and facilities to class Warton as a Key Service Centre; and it will only achieve the status of a Local Service Centre over the lifetime of the Plan if improved services, including shops and community facilities are delivered, in accordance with the aspirations set out in policy **S1** in Chapter 6 and policy **EC4** in Chapter 9. The council agrees with a resident's objection that Warton is not a Local Service Centre at the moment, but it will be if policy **S1** and policy **EC4** are implemented over the lifetime of the Local Plan.

The council notes a landowner's support for the inclusion of Whitehills as a Local Service Centre in policy **S1**. However, the council disagrees with a developer's request that Whitehills should be upgraded to a 'Key Service Centre'. There are insufficient services and facilities currently in place to enable Whitehills to be classed as a Key Service Centre; and it will only achieve the status of a Local Service Centre over the lifetime of the Plan if improved services, including shops and community facilities are delivered, in accordance with the aspirations set out in policy **S1** in Chapter 6 and policy **EC4** in Chapter 9.

The council notes a landowner's objection that Kirkham and Wesham should not be separated within the proposed Settlement Hierarchy and should be considered jointly as a Key Service Centre. The landowner also objected to the omission of Treales, Wharles and Little Eccleston from the list of settlements in policy **S1**. Previously, Treales, Wharles and Little Eccleston were identified as small villages in policy SD1 in the Preferred Option version of the Local Plan. The landowner requested that Treales, Wharles and Little Eccleston be re-introduced into the Local Plan as Tier 2: Smaller Rural Settlements. However, the council has prepared a Settlement Hierarchy Background Paper which sets out the settlement hierarchy for Fylde, and will form part of the background evidence for the Local Plan which covers the period from 2011 to 2032. It indicates in broad terms which settlements are best placed to deliver the sustainable development, accommodating Fylde's requirements, and therefore underpins the Development Strategy for the Local Plan. The key objective of sustainable development is expressed in both the National Planning Policy Framework and National Planning Practice Guidance. Treales, Wharles and Little Eccleston are the lowest scoring settlements in terms of services and facilities in the Settlement Hierarchy Background Paper.

Consequently, the council has resolved not to identify Treales, Wharles and Little Eccleston as Tier 2: Smaller Rural Settlements.

The council notes a landowner's support for the inclusion of Elswick as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy. The scale of development in Elswick is dealt with under paragraphs **7.77** and **7.86** in Chapter 7.

The council notes a landowner's support for the inclusion of Newton as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy.

The council notes a landowner's and a developer's support for the identification of Staining as a Tier 1: Larger Rural Settlement within the Settlement Hierarchy.

The council notes two developer's support for the inclusion of Wrea Green and Elswick as 'sustainable communities' that can accommodate future housing growth.

The council agrees with a landowner and two developers that the second sentence in paragraph **6.12** conflicts with paragraph 15 of the Framework and policies **S1** and **DLF1** which allow windfall and small site developments and should therefore be deleted.

The council notes a developer's support for the general approach taken in the Development Strategy that proposes a Settlement Hierarchy and strategic and non-strategic locations for development.

The council notes a developer's support for policy **S1** which proposes to categorise Kirkham as a 'Key Service Centre' along with Lytham (including Ansdell) and St Annes.

The council notes an Action Group's comments regarding affordable housing provision in Wrea Green which have been made under paragraph **6.12**. The council's response to affordable housing provision is made under policy **H4** in Chapter 10.

Recommendations for change

- Amend the text under **Tier 2: Smaller Rural Settlements** in policy **S1** to read: 'tend to have ~~poorer~~ limited transport connections.'
- Delete the second sentence in paragraph **6.12**: '~~Affordable housing of an appropriate scale within a rural settlement, to meet a particular need, may be justified in accordance with the Framework.~~'

Additional recommendations for change

The following additional changes are proposed to be made to clarify and update the existing text in Chapter 6 for the Publication version of the Local Plan. This will ensure that the Settlement Hierarchy in policy **SL1** is amended, in accordance with the recommendations in the Settlement Hierarchy Background Paper, regarding Elswick.

Additional textual changes

- Delete 'Elswick' from the list of **Tier 1: Larger Rural Settlements** in policy **S1** and add 'Elswick' to the list of **Tier 2: Smaller Rural Settlements**.

Policy DLF1: Development Locations for Fylde

Number of representations:

Comment	Support	Object	Total
20	1	20	41

Representations received from:

- Natural England
- Home Builders Federation
- BAE Systems Real Estate Solutions
- Lancashire County Council
- Wyre Council
- Bryning with Warton Parish Council
- Elswick Parish Council
- Greenhalgh with Thistleton Parish Council
- Treales, Roseacre and Wharles Parish Council
- 7 Landowners
- 7 Developers
- 1 Action Group
- 3 Residents

What you said

The Home Builders Federation did not wish to comment upon the relative merits of the Strategic Locations for Development. It is, however, important that realistic assumptions are

made regarding delivery rates and lead-in times for these sites. These should be assessed through discussions with developer interests for the various sites. A greater promotion of other sites and locations may also be necessary to ensure that the housing requirement is delivered and to provide flexibility.

*The Home Builders Federation objected to policy **DLF1**. The policy sets a minimum target of 7,700 new homes over the plan period (2011 to 2032) at an average rate of 370 homes per annum (dpa). The reference to the housing requirement as a minimum is supported, this is consistent with the Framework requirements to plan positively and to boost significantly the supply of housing. It is, however, unclear whether the target is a gross or a net requirement. This should be clarified. The Home Builders Federation strongly recommended that it is identified as a net requirement. Whilst the Home Builders Federation supported the expression of the housing requirement as a minimum it is considered that the overall housing requirement to be inadequate to ensure that the economic and housing strategies within the plan align. In conclusion the evidence supports the Home Builders Federation position that the proposed housing requirement is too low and does not align with the economic strategy within the plan, nor will it meet the affordable housing needs of the area. It is therefore recommended that the housing requirement be increased towards the upper end of the objectively assessed needs range identified in the SHMA addendum 2,440 to 450dpa (net). The Home Builders Federation's objection to the housing figure is set out in full in policy **H1** in Chapter 10.*

Lancashire County Council supported the rationale of delivering housing through strategic locations where there is potential to optimise complementary infrastructure and access to services, facilities, employment and increase travel choices. Based on this rationale, the potential for a greater proportion of housing growth to take place in the Kirkham area should be considered in order to achieve balanced and sustainable growth. It is currently proposed that 14% of housing should be located in the Kirkham and Wesham Strategic Location for Development. Given that Kirkham station is a key rail link in the Borough and within the Fylde Coast area, it has the potential to support housing growth by providing a significant, sustainable travel opportunity.

*Wyre Borough Council noted the proposed development strategy set out in policies **S1** and **DLF1**. The Strategy as a whole is not likely to have significant implications for Wyre Borough. The main cross boundary consideration is the northern most parts of Fylde.*

*Bryning with Warton Parish Council commented that paragraph **6.19** presents a suggested means and avenue of progression for the delivery of a local retail centre in Warton.*

Elswick Parish Council considered that planning over 7000 homes in Fylde is unrealistic. The land proposed for industrial use is also excessive. No account seems to have been made in the Local Plan of the enterprise zone at Blackpool Airport or of possible shale gas extraction, the latter of which is due to generate thousands of jobs if Cuadrilla's publicity is correct. This should mean that land proposed for industrial use can be freed up for housing reducing the need for green field developments.

Greenhalgh Parish Council wished to see changes to the plan to limit expansion of development into the countryside through the setting of realistic rather than inspirational housing targets to meet the housing market level to date rather than 'catching-up'.

A landowner supported the identification of Warton as a Strategic Location for Development.

However, the landowner considered that further sites should be identified within it, in order to ensure that both infrastructure can be delivered and has capacity to accommodate identified growth, and additionally that there is some confidence that both the housing need and employment requirements can be delivered through the Local Plan within the Borough.

A landowner commented on Framework Paragraph 47 specifically requires LPAs to boost significantly the supply of housing. It also requires them to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. It is considered that the suggested minimum target of 7,700 net new homes will not meet the full objectively assessed housing needs. The suggested housing target would fail to make adequate provision to meet Fylde's affordable housing needs and economic growth. The council's selection of the 370 homes per annum Objectively Assessed Need figure represents the bottom of the potential Objectively Assessed Need range identified in the SHMA. It is clear that to deliver the economic growth and affordable housing requirement, the housing targets will need to be more reflective of the upper end of the Objectively Assessed Need range. Significant additional housing is therefore required than what is currently being provided for in the Local Plan. The policy text also states that development will not be permitted which would prevent or undermine the operation of existing land uses, including Mineral Safeguarding Areas. Large areas of land within Fylde lie within Mineral Safeguarding Areas, and indeed many of the strategic sites lie within such areas. Accordingly, the policy should not automatically preclude development in these areas.

*A landowner considered that Wrea Green should be identified as a 'Non-Strategic Location' that is capable of accommodating a specific residential allocation on their landholdings for up to 50 homes in policy **DLF1**. As a Tier 1: Larger Rural Settlement, the council advice in policy **S1** - Settlement Hierarchy that: 'The larger rural settlements provide small scale essential local services, as well as local opportunities for employment. They can therefore be regarded as sustainable communities, albeit with a dependency on, and sustainable transport connection to / from, the Key Service Centres, Local Service Centres and the Strategic Locations for Development.' As a sustainable community, in accordance with the Framework objectives for sustainable development, it is considered apt that a specific residential allocation is provided in Wrea Green. This will assist in delivering the 7700 homes required in Fylde by 2032.*

A landowner supported the identification and inclusion of the Fylde-Blackpool Periphery as one of the four proposed Strategic Locations for Development in the Local Plan, and the proposed spatial framework for the distribution of development across the Borough between the Strategic and Non-Strategic Development Locations. The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing needs in Fylde and development must therefore take

place on suitable greenfield sites in sustainable locations. As an identified sustainable Local Service Centre, the Landowners support additional greenfield development at Whitehills as a recognised focus for development within the Fylde-Blackpool Periphery Strategic Location for Development. The Landowners do not support the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period and consider this figure should be increased (see comments in relation to policy H1).

A landowner commented that the SHLAA 2015 update states that there is insufficient land within existing settlement boundaries to meet the housing needs of the Borough. Sustainable development on the edge of existing settlements is supported in order to meet the council's objectively assessed housing need. Whilst the general distribution of housing across the Borough is supported, it is considered that the proposed minimum housing requirement is too low at 7,700 homes. As a Tier 1: Larger Rural Settlement additional greenfield development in Elswick is supported by the landowner. The landowner claims that Elswick is a settlement that can accommodate an appropriate level of additional growth in order to help to support local services and facilities. Consideration should be given to the allocation of land for housing in Elswick.

A landowner objected to the allocation and location of development and particularly housing which is insufficient to meet development needs to 2032 and does not provide sufficient growth and housing to sustain settlements such as Staining. Too much reliance has been placed on larger strategic sites and overestimated their delivery. The level of development prescribed in Non-Strategic Locations for Development and Allowances and unallocated sites will not meet future development needs of Staining which foresees 141 homes from 2011 to 2032. For example 113 homes are planned for completion by 2018 and only one allocation for 28 homes is proposed following the plans adoption. This proposal has no regard to whether the allocations will meet needs of all the community such as affordable housing given the past commitments have failed to deliver the required level of affordable housing in Staining. This allocation meets historic need, and should be updated based on relevant Objectively Assessed Need as part of the emerging plan and should positively plan for significantly boosting housing in accordance with the Framework. The level of development is set to low and whilst monitoring may identify a shortfall the probability should be reduced by establishing sufficient development at the outset and this approach provides no certainty to the general public or developers of where additional development will occur. Development levels should be increased to allow flexibility for sites in suitable and sustainable locations outside of the Strategic Locations in Tier 1: Larger Rural Settlements such as Staining to come forward.

A landowner supported the identification of Staining as a Tier 1: Larger Rural Settlement within the Settlement Hierarchy as it confirms Staining as a sustainable community and location for future development.

A landowner supported the proposed general distribution of new housing across the Borough, but considered the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period is too low and should be increased. The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing needs in Fylde, and sustainable

development must therefore take place on suitable greenfield sites on the edge of existing settlements. As a Tier 1: Larger Rural Settlement, additional greenfield development at Newton is therefore supported. Newton is a sustainable settlement that can accommodate appropriate additional growth and the development of further housing will help to sustain and foster local community services and village facilities.

*A developer supported the proposed general distribution of new housing across the Borough but objects to the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period and considers this figure should be increased (see comments in relation to policy **H1**). The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing needs in Fylde, and sustainable development must therefore take place on suitable greenfield sites on the edge of existing settlements. As a Tier 1: Larger Rural Settlement, additional greenfield development should therefore be permitted at Staining. Staining is a sustainable settlement that can accommodate appropriate additional growth and the development of further housing will help to sustain and foster local community services and village facilities. The developer therefore objects to the proposed wording under the sub-heading of Non-Strategic Locations set out in the policy text and requests that this is revised to acknowledge Staining as a Tier 1: Larger Rural Settlement where non-strategic development can take place on the edge of the settlement. The proposed policy wording should state: 'Non-strategic development sites (amounting to between 10 and 99 homes) are situated within the four Strategic Locations for Development. Non-strategic development sites also occur within and on the edge of the Tier 1: Larger Rural Settlements at Elswick, Newton and Staining and the Tier 2: Smaller Rural Settlement at Clifton'.*

*A developer was concerned that policy **DLF1** contained no justification for the housing requirement figure of 7,700 new homes. The draft plan should include the basis for the figure if it is to be robust. As a result, the developer reserves the right to make further representations on the appropriateness of this figure. The developer supports the fact that the Strategic Locations for Development are to accommodate the bulk of new housing in the Borough. Why is there a reference to 'existing uses' in the policy. This seems to suggest that development which requires the displacement of an existing use would not be permitted. Clearly there is no justification for such a stance as this could remove any prospect of previously developed land coming forward, and is contrary to national planning policy. This reference should be removed.*

*A developer commented that policy **DLF1** identified how the proposed district wide housing figure will be delivered across the Local Authority area. Development is proposed to be delivered in and around the higher order settlements, with some additional development directed to Tier 1: Rural Settlements and other non-strategic locations. The non-strategic locations for development are to accommodate housing growth of 9%, compared to 11% on windfall sites. It is considered that to allow for plan-led development, that the figure for the non-strategic locations (including Wrea Green) be increased, and the allowance for windfalls reduced to ensure that sustainable development is delivered to settlements that can support them.*

Two developers strongly objected to the proposed housing requirement and distribution strategy set out in this Revised Preferred Option. Firstly, it is considered that the plan has underestimated the total annual housing requirement within Fylde by approximately 20% and that a figure of 440 to 450 homes per annum would be required to meet Fylde's economic growth aspirations and affordable housing obligations, as recommended in the 2014 SHMA Addendum 2. This has major implications on the distribution strategy within the plan, and indicates that the plan would need to identify a total supply of between 11,088 and 11,340 homes to be able to deliver this requirement with a suitable buffer for non-delivery, which represents an increase of up to 3,150 homes (38%) from the current identified supply. Much of this additional housing will need to be accommodated within the four Strategic Locations for Development, with particular pressure on Warton, given constraints elsewhere and evidence from an earlier version of the Local Plan confirming that Warton is a sustainable location that could support 1,160 homes. Accommodating this 1,160 figure would require an uplift of 510 from the 650 homes currently proposed in Warton, which is not considered unreasonable, as it equates to just 16% of the 3,150 additional homes required.

A developer objected to policy **DLF1**. Policy **DLF1** sets out four locations for strategic development in the Borough, one being at 'Warton'. These strategic locations form the basis for the 'Local Plan Development Strategy'. There is no Strategic Location specified in the plan for Warton, and so the local plan as currently drafted fundamentally fails its requirement to plan positively and clearly and is unsound as a consequence. A Strategic Location is required to be set out in the plan at Warton.

A developer endorsed the council's general approach to its Development Strategy which proposes a Settlement Hierarchy and Strategic and Non-strategic Locations for Development that are required to accommodate the level of growth in new homes, jobs and associated services across Fylde during the entire plan period. It is considered that the principles of this approach are consistent with the Framework and associated guidance within the Planning Practice Guidance (PPG), specifically paragraph 47 of the Framework that seeks to significantly boost the supply of housing and to identify key sites which are critical to the delivery of the housing strategy over the plan period.

A developer supported policy **DLF1** which confirms that the Local Plan will deliver a minimum of 7,700 new homes over the Plan period to 31st March 2032, with four Strategic Locations for Development forming the basis for the Local Plan Development Strategy. The reference to the housing target as a minimum is supported as this is consistent with the requirements of the National Planning Policy Framework (the Framework) to plan positively and to boost significantly the supply of housing. The developer supported the figure to be expressed as a minimum to deliver the council's emerging Development Strategy.

A resident objected to the minimum housing figure (7700) and the employment land requirement (59.1Ha), which the resident claims are both deeply flawed. In the case of the former, the resident claims the council has failed to give the necessary weight and consideration to all the available evidence on the real housing requirement in the Fylde as evidenced by the present and past record of housing completions and the exceptional number of outstanding permissions. In the case of the building land, the resident claims the

council continues to misunderstand the business trends in the Borough and the evidence of its own figures which show that employment land use in Fylde has been in long term decline as a result of a change of industries and the impact of technology. There is a requirement for a relatively small amount of employment land to recognise a change in location of business in the Borough (less than a third of the amount quoted in this section and already assigned under existing developments).

A resident objected to the housing numbers which they considered were far too high and should be reduced, there is no proven need and as the figure is so high it will never be possible to achieve a five year housing supply number. Previously developed land and surplus employment land should be used for housing development not open countryside and there is enough of this type of land available. The housing figure is based on an aspiration which sees a huge increase in future employment which the resident considers is excessively over-optimistic. The resident is dissatisfied with the underlying data and processes used by Fylde to determine the housing figure claiming that the calculations are based on obsolete and flawed data, Fylde should produce its own housing requirement numbers based on historical fact. The resident also believes that housing need figures are massively overstated. Consultants have admitted that their findings had been a benchmarking exercise to compare Fylde with other Authorities so standard models had been used by them and the real need for affordable housing was a tenth of the 420 stated therefore 42 p.a. not 420.

A resident claimed there was far too much employment land allocated in the Plan because of flawed employment land calculations, officers have allocated twice as much employment land as is needed. Flaws and errors in Employment Land Policy could render the Local Plan unsound. Historic land take-up should have been used as a base, there is an over-supply of employment land. Some employment land should be released for housing. Fylde, which is smaller than both Blackpool and Wyre, appears to have twice as much employment land in its Plan as both Blackpool and Wyre together. The resident considers that the amount of land in the Plan is aspirational rather than what is actually needed. Greater employment land shown in the plan would mean that more land would need to be allocated for housing to accommodate workers, which could attract more 'New Homes Bonus', which the council seems to be more and more reliant on to balance its books.

Paragraph 6.13

A resident objected to the wording on 'the timely provision of the necessary infrastructure' in paragraph 6.13. The resident claims that this appears to be something that is completely beyond the council's control. The resident questioned how the council proposes to set about ensuring that development is phased after infrastructure.

Paragraph 6.14

An Action Group objected to 'the Local Plan seeks to ensure that development occurs in the most sustainable locations' in paragraph 6.14; claiming that this was not so, otherwise Freckleton would have taken a greater proportion of the development.

A resident objected to paragraph 6.14, claiming the proposal that up to 99 homes can be built on top of the strategically agreed development is unacceptable.

Paragraph 6.15

An Action Group objected that flooding now includes sewage overflow and questioned where this is taken into account. Development in non-strategic locations still needs to be sustainable and this should be said.

Paragraph 6.16

A resident objected to paragraph 6.16 claiming this it was not a reasoned justification, and that it was an excuse, which should be deleted.

Paragraph 6.18

Natural England commented that there appears to be a degree of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations, 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would provide certainty that housing can be delivered during the plan period. It may be that Fylde can confirm that further discussion has taken place between the council and United Utilities with respect to proposed growth and require infrastructure, taking into account recent Water Cycle Studies and the Infrastructure Delivery Plan. It would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised HRA. An example where there are uncertainties is as follows: ‘... the Fylde-Blackpool Periphery has some wastewater infrastructure issues (meaning development will need to be phased with wastewater infrastructure being delivered prior to development commencing ...’

Paragraph 6.19

BAE Systems Real Estate Solutions commented that the paragraph refers to the provision of a local retail centre being developed within Warton on previously developed land owned by BAE Systems on Lytham Road. There is land on the BAE Systems Warton Aerodrome site that has been unused for some years and that is currently surplus to operational requirements that is located adjacent to Lytham Road. This land, along with the whole of the Aerodrome site, is designated within the Lancashire Enterprise Zone where land is to be used primarily to promote advanced manufacturing and engineering (AEM). Any change to development of this land other than as an Enterprise Zone would need to be agreed with key stakeholders including the Department for Communities and Local Government, Lancashire County Council and the Local Enterprise Partnership (LEP). The priority for development within the

Enterprise Zone is for AEM use which is supported by the policy EC2. Any aspiration for other uses on land within the Enterprise Zone will need to be considered by the LEP and only allowed following a strategic decision by the LEP to allow more than AEM use on the Enterprise Zone. BAE Systems Real Estate Solutions considered that the end of the last sentence to the paragraph would be better worded as '... it will become a more sustainable location for new development over the lifetime of the Local Plan...'

Paragraph 6.21 and Table 2 – Distribution of Development to 2032

Treales, Roseacre and Wharles Parish Council commented on paragraph 6.21 that the land released for new business ventures at Local Enterprise Zone sites at Warton and Blackpool should be identified as additional employment land. This is because new activities and new initiatives will be required to attract new employment and organisations to these locations. Alternatively, the total area occupied by BAE Systems and the LEZ and The Blackpool Airport site and its environs could be listed. In that way the total strategic opportunity for employment could be shown. Similarly the prospective or actual change in employment by the BAE Systems and Balfour Beatty should be addressed directly within the context of the strategies of these organisations and how FBC can engage with each to encourage them to retain and grow their employment activities in a sustainable way.

The Home Builders Federation commented that Table 2 identified 11% (937 homes) of the overall requirement will be met through allowances and unallocated sites. These are presumably windfall sites, although confusingly paragraph 10.22 which suggests a windfall allowance of 680 homes (32dpa). Table 2 therefore needs to provide far greater clarity upon what is meant by 'allowances and unallocated sites'. The Framework, paragraph 48, permits an allowance for windfalls providing it is based upon compelling evidence not only that such sites have become available in the past but that they will continue to do so. The proposed rates of delivery equate to approximately 45dpa from windfalls. This is in excess of the allowances suggested within the most recent Strategic Housing Land Availability Assessment (SHLAA), published in October 2012. Whilst it is recognised this study is now somewhat out of date this identified a windfall allowance of 14dpa, even if all conversions are included this only rises to 35dpa. It is also noted that the previous preferred options identified a windfall allowance of 30dpa. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of a windfall allowance is not used as a mechanism to reduce the number of sites allocated within the plan. The Council's attention is drawn to the Inspectors decision upon the Selby Core Strategy where its windfall allowance has been removed from the annual plan targets and is instead provided as a buffer. It is equally important that the delivery of windfall sites against the assumptions identified is closely monitored through the Authority Monitoring Report. Failure to achieve the windfall assumptions will require the council to consider releasing other sites, or to review its plan, to ensure a 5 year housing supply and fulfils the housing requirements within the plan.

A landowner commented that Wild Lane and Peel Road landowners support the proposed distribution of 80% of the proposed requirement to the four Strategic Locations for Development and the sub-distribution between them, in favour of development at the Fylde-

*Blackpool Periphery Strategic Location for Development. It is inevitable that delivery from some existing commitments and/or proposed allocations will not come forward or will be delayed, and relying on unallocated small sites and an anticipated windfall allowance for contingency within the proposed housing supply will simply add to the risk of under-delivery. On the basis that the housing requirement should be a minimum to confirm to the Framework requirement of significantly boosting supply, additional positive and plan-led housing allocations or an Additional Strategic Site should therefore be identified to provide greater contingency and flexibility. The SHLAA and 2015 Call for Strategic Sites demonstrate there is capacity to increase the amount of development that can be successfully accommodated at the Fylde-Blackpool Periphery Strategic Location for Development on land between Wild Lane and Peel Road, and this should be reflected in the proposed distribution set out in **Table 2** and the allocation of land in policy **SL2**.*

*A landowner objected considering that given the inadequate minimum housing delivery target identified under policy **DLF1**, the housing target and number of allocated sites assigned to Strategic Location 4: Kirkham and Wesham should be increased to make provision for the necessary additional housing land required. The Mill Farm Sports Village Development, together with the enhancements to the railway station have significantly improved the sustainability and accessibility of Kirkham and Wesham. Furthermore, paragraph **2.3** of the RPO acknowledges that Kirkham and Wesham is the only sizeable inland settlement in the borough. Kirkham and Wesham is therefore clearly a location which could accommodate further growth in a sustainable manner.*

A landowner objected claiming that the allocation and location of development and particularly housing is insufficient to meet development needs to 2032 and does not provide sufficient growth and housing to sustain Non-Strategic Locations for Development and settlements such as Staining. Too much reliance has been placed on larger strategic sites, overestimated their delivery and focussed to highly on windfall allowance to address unmet needs. The level of development prescribed in Non-Strategic Locations for Development and Allowances and unallocated sites will not meet future development needs of Staining which foresees 141 homes from 2011 to 2032 and should be increased. For example 113 homes are planned for completion by 2018 and only one allocation for 28 homes is proposed following the plans adoption. This proposal has no regard to whether the allocations will meet needs of all the community such as affordable housing given the past commitments have failed to deliver the required level of affordable housing in Staining. This allocation meets historic need, and should be updated based on relevant Objectively Assessed Need as part of the emerging plan and should positively plan for significantly boosting housing in accordance with the Framework. The level of development is set to low and whilst monitoring may identify a shortfall the probability should be reduced by establishing sufficient development at the outset and this approach provides no certainty to the general public or developers of where additional development will occur. Development levels should be increased to allow flexibility for sites in suitable and sustainable locations outside of the Strategic Locations in Tier 1: Larger Rural Settlements, such as Staining to come forward.

A landowner considered that Wrea Green should be identified as a 'Non-Strategic Location' that is capable of accommodating a specific residential allocation on their landholdings for up to 50 homes. This would help to meet the 9% or 711 homes required from 'Non-Strategic

*Location' sites. The landowner considers that the distribution proposed relies too heavily on the Strategic Locations (policies **SL1-4** inclusive) and that further flexibility is required and that policy wording is required in policy DF1 to reflect this fact and reflect this matter in **Table 2**.*

*A developer is concerned at the content of **Table 2: Distribution of Development to 2032** in respect of the split between policies **SL1** and **SL2**. Given that Lytham St. Annes is the main settlement of the Borough with the majority of the retail and community facilities as compared to the Fylde-Blackpool periphery, it is submitted that the majority of new housing should be directed to the town. It is submitted that the balance of housing allocations in **Table 2** should be altered to give **SL1** 33% and **SL2** 25% of the proposed housing.*

*A developer objected to **Table 2** of the RPO Document, which sets out the Council's proposed distribution of development. It is anticipated the four Strategic Locations will deliver 80% of the Council's total housing requirement. However, there does not appear to be any contingency or policy mechanism in place through which the Council can respond to a shortfall in housing delivery should any of the four Strategic Locations fail to come forward, or the delivers fewer homes than estimated. There are major concerns over the effectiveness of the Plan and deliverability of the four Strategic Locations identified within the Plan. In particular it is unclear what assumptions have been applied to the rates of deliverability, no evidence has been provided within the Plan or associated evidence based documents. The large scale of these four Strategic Locations means that they may be developed by multiple housebuilders. Whilst this would increase the overall output of homes achieved per year in comparison to a smaller sites, the annual delivery rate from these sites must not be overestimated as increased local market competition can serve to dampen delivery rates typically achieved. The rate of delivery from these sites must not therefore be assumed to increase incrementally at a rate which is consistent with sites of one or two developer outlets, but marginally decreased proportionately with each new additional developer to take account of the effects of market saturation. Whilst the application of these recommendations would represent a cautious approach, it would significantly strengthen the position of the Council especially where a Strategic Site achieves exceptional delivery rates. The developer commented that the council must also recognise that the delivery of Strategic Locations can be difficult due to their scale and complexity. Such sites may be subject to multiple landownership, and/or require a significant amount of upfront investment to enable their delivery (such as new road infrastructure, utilities and education provision). Lead-in times for the delivery of Strategic Sites can be significantly prolonged, and as a result cannot be reasonably expected to contribute to short term supply needs. It is considered that the council must look to allocate additional sites within their Local Plan or create a policy mechanism to ensure that if there is a failure to deliver an ongoing shortfall is avoided. The council should be allocated sites within Tier 1: Larger Rural Settlements such as Elswick as part of the Local Plan process. This should not be left until the Neighbourhood Plan, for which there is no certainty will come forward*

A developer considered that the proposed distribution of 20% of the housing requirement between Non-Strategic Locations for Development (9%) and Allowances and Unallocated Sites (11%), was flawed. It is inevitable that delivery from some existing commitments and/or proposed allocations will not come forward or will be delayed, and relying on

unallocated small sites and an anticipated windfall allowance for contingency within the proposed housing supply will simply add to the risk of under-delivery. On the basis that the housing requirement should be a minimum to confirm to the Framework requirement of significantly boosting supply, additional positive and plan-led housing allocations should therefore be identified to provide greater contingency and flexibility. The SHLAA and 2015 Call for Non-Strategic Sites demonstrate there is capacity to increase the amount of development that can be successfully accommodated at Non-Strategic Locations for Development, and particularly at the sustainable Tier 1: Larger Rural Settlements, and this should be reflected in the proposed distribution set out in **Table 2** and the allocation of land in **Table 3** (in Chapter 7).

A developer commented on **Table 2** which identifies 11% (937 homes) of the total housing requirement which is to be met through 'allowances and unallocated sites'. However, it is unclear whether this is a windfall allowance, as paragraph 10.22 suggests a windfall allowance of 680 homes. **Table 2** therefore needs to provide greater clarity upon what is meant by 'allowances and unallocated sites'. Paragraph 48 of the Framework states: 'Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply...' The proposed rates of delivery equate to approximately 45dpa from windfalls. This is in excess of the allowance suggested within the Council's Strategic Housing Land Availability Assessment (SHLAA), published in October 2012. Whilst it is recognised this study is now out of date, it identified a windfall allowance of 14dpa, even if all conversions are included this only rises to 35dpa. It is also noted that the previous Preferred Option identified a windfall allowance of 30dpa. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of windfall allowance is not used as a mechanism to reduce the numbers of sites allocated within the plan.

A developer welcomed the fact that the proportion of windfall and smaller/ non-strategic sites has reduced from 31% to 20% of the total supply, as this introduces more certainty into the process, with less reliance on unplanned development. That said, **Table 2** still identifies 11% (937 homes/ 45 dpa) as coming through 'allowances and unallocated sites'. The breakdown of this figure is set out within the trajectory at **Appendix 2** of the RPO. That said this breakdown is not made clear within the text, as neither the policies or supporting text to **DLF1** or **H1** refer to **Appendix 2**, and paragraph 10.22 actually offers a contradictory figure suggesting a windfall allowance of 680 homes (32 dpa), therefore we would ask for greater clarity on this matter. Paragraph 48 of the Framework does permit an allowance for windfalls: 'if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply'. The proposed windfall delivery rate of 40 dpa from year 10 onwards does reflect the quoted level of windfall since 2011, with residual completions and committed small sites expected within years 1-9 averaging over 45 dpa, although it is unclear exactly where these sites have come from as the SHLAA has not been updated since 2012. Therefore, there is some evidence of past windfall and we welcome the fact that the proposed allowance is only applied from year 10 onwards as this removes any double counting. However, there is no compelling evidence that this past rate of windfall will continue through the plan period. Firstly, the

current windfall total includes 51 homes that are 'minded to approve', meaning they are not yet committed, and also includes an elevated delivery rate of 59 dpa in years 5-9 which is not evidenced, and is significantly higher than the projected delivery rates set out within the 2012 SHLAA (which set a rate of 14 dpa, rising to 35 if conversions are included) and within the 2013 Preferred Options (which set a rate 30 dpa). Secondly, windfall rates should fall as a new plan progresses to adoption as more sites are allocated or picked up through the SHLAA process. In this case, given the limitations of the previous Local Plan, which was adopted in October 2005 with an extremely restrictive approach to housing, comprising a residual requirement of just 1 home between 2005 and 2016, it is entirely reasonable to assume that the vast majority of the Council's housing supply in recent years has been through windfall development. As such, development opportunities of this scale and nature will have been partly exhausted over the last 4 years and there is no evidence to indicate that windfall development could continue at the same rate and scale. Failure to deliver against windfall targets will hinder delivery of the plan and the ability to demonstrate a 5 year housing land supply, which Fylde have struggled to do in recent years anyway. It is recommended that the windfall allowance is not used as a mechanism to reduce the number of allocated sites, and could instead be used to provide the buffer (see paragraph 5.20), as recommended in the Inspector's report on the Selby Core Strategy. It's equally important that the delivery of windfall sites is closely monitored through the AMR process. Failure to achieve the windfall assumptions will require the Council to consider releasing other sites, or review its plan, to ensure a 5 year housing supply and that the full housing requirements of the plan are met.

A developer objected to **Table 2**, which sets out the proposed distribution of housing and employment over the plan period, Warton having the least amount of housing of all the areas within the Borough, including the rural areas (8%). This is not logical nor sustainable and requires amendment to reflect the importance of Warton in the employment profile of the Borough (and indeed the region) and the housing needs this role will create. Thus the distribution set out in **Table 2** is not sound and requires to be reconsidered. A significantly increased share for Warton should be included in the reconsidered **Table 2**.

Council response

The council notes the Home Builders Federation's, seven landowners and three developers objections to the housing requirement figure which is mentioned in policy **DLF1** and the Federation's recommendation that the housing requirement be increased towards the upper end of the objectively assessed needs range identified in the SHMA Addendum 2,440 to 450dpa (net). The Home Builders Federation's objection to the housing figure and the council's response is set out in full in policy **H1** in Chapter 10.

The council notes LCC's support for the rationale of delivering housing through strategic locations, but disagrees with LCC's claim that there is potential for a greater proportion of housing growth to take place in the Kirkham area. Kirkham is identified as a Strategic Location for Development and 14% of the development proposed by the Local Plan is at Kirkham. This is considered a sustainable amount of development for this Key Service Centre. The majority of development is directed to the Strategic Location for Development

at Lytham and St Annes (25%) and Fylde-Blackpool Periphery (33%), this is the council's Revised Preferred Option.

The council notes the comments made by Wyre Borough Council that the development strategy as a whole is not likely to have significant implications for the borough.

The council notes the comments made by Bryning with Warton Parish Council regarding the wording in paragraph **6.19** and the delivery of a local retail centre in Warton.

The council notes Elswick Parish Council's objection to the figure of 7000 new homes in Fylde being unrealistic and that the land proposed for industrial use is excessive. The housing requirement figure is dealt with in policy **H1** in Chapter 10 and the employment land figure and the Blackpool Enterprise Zone are dealt with in policy **EC1** in Chapter 9.

The council notes Greenhalgh Parish Council's comments requesting limits to the expansion of development in the countryside through setting realistic, rather than aspirational housing targets. The housing requirement figure is dealt with in policy **H1** in Chapter 10.

The council notes a landowner's support for the identification of Warton as a Strategic Location for Development, but also the landowner's request for the identification of additional sites within the Strategic Location, to ensure a critical mass is achieved to ensure the delivery of associated infrastructure. Similarly, the council notes a developer's objection that Warton could accommodate 1,160 homes, an uplift of 510 from the 650 homes proposed in Warton, which the developer does not consider to be unreasonable, as it equates to 16% of the 3,150 additional homes required. The council also notes another developer's objection that there are no allocations in policy **SL3** for Warton and so the Local Plan fundamentally fails to plan positively and is clearly unsound as a consequence. Bearing in mind the inspector's appeal decision, approving development at Blackfield End Farm, the council agrees to redraft policy **SL3** in Chapter 7, listing all the existing commitments in this policy.

The council notes a landowner's comment that policy **DLF1** should not automatically preclude development in these areas, but refers the landowner to paragraph **1.41** in Chapter 1. Paragraph **1.41** says: 'Before development takes place on these strategic sites, LCC advises that site surveys are carried out to assess the extent and quality of the mineral reserves and whether, in the case of the sand and gravel deposits, there is a case for prior extraction before built development commences. The undertaking of site surveys could affect the phased development and delivery of housing on these strategic sites over the lifetime of the Local Plan'. The Local Plan should be read as a whole and every policy and supporting justification should be considered equally (paragraph **1.9**).

The council notes a landowner's request that Wrea Green should be identified in policy **DLF1** as a 'Non-Strategic Location' that is capable of accommodating up to 50 homes. The council disagrees with the landowner that the distribution proposed relies too heavily on the Strategic Locations for Development, or that further flexibility is required. The council considers that Wrea Green has delivered sufficient new homes – 150 homes - granted since

the start of the plan period from 1st April 2011, and there is therefore no need for the allocation of land for additional homes within the plan period.

The council notes a landowner's support for the identification and inclusion of the Fylde-Blackpool Periphery as one of the proposed Strategic Locations for Development in the Local Plan.

The council notes a landowner's support for the identification of Elswick as a Tier 1: Larger Rural Settlement, which could accommodate an appropriate level of additional housing to support local services and facilities.

The council notes a landowner's support for the identification of Staining as a Tier 1: Larger Rural Settlement in policy **S1**.

The council notes a landowner's and a developer's request that development levels should be increased to allow flexibility for sites in suitable and sustainable locations outside the Strategic Locations for Development in Tier 1: Larger Tier Rural Settlements such as Staining. The council's development strategy focusses development in the four Strategic Locations for Development and limits further development in Tier 1 and Tier 2: Rural Settlements, due to the lack of services and facilities in those settlements. Development needs to be focussed in and around the existing urban centres to ensure a critical mass is achieved in terms of infrastructure delivery – and concentrating development at the four Strategic Locations for Development will achieve this. In addition, planning permission has been granted for 113 homes in Staining. There is also an allocation for 28 homes (paragraph **7.79**). Consequently, the council considers that no further housing allocations need to be made in Staining and it does not need to be referred to under the 'Non-strategic locations' in policy **DLF1**.

The council notes a landowner's support for the identification of Newton as a Tier 1: Larger Rural Settlement and the landowner's claim that Newton is a sustainable settlement that can accommodate appropriate additional growth and the development of further housing would help to sustain and foster local community services and facilities.

The council notes a developer's objection to the section on 'Existing Land uses' in policy **DLF1**. This section was added following representations received from statutory consultees during the consultation into the Preferred Option consultation into the Local Plan, which took place in summer 2013 after the publication of the Framework. The council considers that the wording in this section of policy **DLF1** does not remove the prospect of previously developed land coming forward for development.

The council notes two developers support for the approach taken in policy **DLF1** which are consistent with Planning Practice Guidance and paragraph 47 of the Framework, which seeks to significantly boost the supply of housing and to identify key sites which are critical to the delivery of the housing strategy over the plan period.

The council notes two residents objections to the housing figure and the employment land figures referenced in the plan. The council's response to the representations received on the

housing requirement figure is dealt with in policy **H1** in Chapter 10 and the employment land figure is considered under policy **EC1** in Chapter 9.

The council notes a resident's objection to the wording 'timely provision of the necessary infrastructure' in paragraph **6.13**, which the resident claimed was completely beyond the council's control. The council has prepared an Infrastructure Delivery Schedule, which was issued for consultation alongside the RPO version of the Local Plan. The council has been working closely with infrastructure providers throughout the plan making process to ensure the requisite infrastructure is provided to overcome existing shortfalls and accommodate all of the new development allocated in the Local Plan.

The council notes an Action Group's objection to paragraph **6.14** claiming that Freckleton should have taken a greater proportion of the development. Any potential future development at Freckleton is restricted by the Green Belt boundary and areas at risk of flooding.

The council notes a resident's objection to paragraph **6.14** claiming that the proposal that up to 99 homes could be built on top of the strategically agreed development is unacceptable. In actual fact, the text in paragraph **6.14** does not say that up to 99 homes could be built on top of the strategically agreed development; it says that non-strategic developments (smaller sites) could occur within Strategic Locations for Development, not on top of the agreed development, but as part of it (that is a large site may be broken down into a number of smaller sites).

The council notes an Action Group's objection to paragraph **6.15** regarding sewage overflows and flooding. Wastewater and drainage infrastructure, together with flood risk management is dealt with in the Infrastructure Delivery Plan, which was issued for consultation alongside the RPO version of the Local Plan.

The council notes but disagrees with a resident's objection that paragraph **6.16** is not a reasoned justification, but an excuse which should be deleted.

The council notes Natural England's comment about the need to resolve areas of uncertainty with United Utilities such as in paragraph **6.18**: '... the Fylde-Blackpool Periphery has some wastewater infrastructure issues (meaning development will need to be phased with wastewater infrastructure being delivered prior to development commencing) ...' The council agrees that any uncertainty should be explored to ensure the Plan complies with Regulation 102 of the Conservation of Habitats and Species Regulations 2010. The council will contact United Utilities and resolve the wastewater infrastructure issues prior to issuing the Publication version of the Local Plan in summer 2016.

The council notes BAE Systems Real Estate Solutions comments on the provision of a local retail centre being developed within Warton on previously developed land owned by BAE Systems on Lytham Road. The council agrees to amend the last sentence of paragraph **6.19**.

The council notes Treales, Roseacre and Wharles Parish Council's comment on **Table 2** that the land released for new business ventures at Local Enterprise Zone sites at Warton and

Blackpool should be identified as additional employment land. All of the responses to the employment land figures, including the Enterprise Zones at BAE Systems, Warton and Blackpool Airport are dealt with in Chapter 9.

The council notes the Home Builders Federation and two developers' comments on **Table 2** identifying 11% (937 homes) of the overall requirement will be met through allowances and unallocated sites, which comprise windfall sites. The council's response to representations received on the housing requirement figure, including windfall sites are dealt with under policy **H1** in Chapter 10.

The council notes a landowner's support for the proposed distribution of 80% of the proposed housing requirement to the four Strategic Locations for Development, including the Fylde-Blackpool Periphery. The landowner's comments requesting an increase in the amount of development that could be successfully accommodated at the Fylde-Blackpool Periphery Strategic Location for Development on land between Wild Lane and Peel Road, which could be reflected in the proposed distribution set out in **Table 2** and in the allocation of land in policy **SL2** are all part of the representations submitted regarding the housing requirement figure, which are dealt with under policy **H1** in Chapter 10.

The council notes a developer's objection to **Table 2** claiming that the majority of new housing should be directed towards Lytham and St Annes compared to the Fylde-Blackpool Periphery. Lytham and St Annes are constrained by the coastline, Green Belt and areas at risk of flooding. The council considers that there is an opportunity to create a new sustainable community at the Fylde-Blackpool Periphery Strategic Location for Development and that this area should take 33% of the development compared to 25% in Lytham and St Annes and not the other way around.

The council notes a developer's objection to the reliance on focussing development in the four Strategic Locations for Development, but should allocate sites with Tier 1: Larger Rural Settlements such as Elswick as part of the Local Plan process. The developer claims that this should not be left to the Neighbourhood Development Plan, when there is no certainty it will come forward. The allocation of land and delivery of development in Elswick is dealt with in Chapter 7.

The council notes a developer's objection to **Table 2** claiming that Warton has the least amount of housing of all of the Strategic Locations for Development and the rural area. The developer claims this is illogical, not sustainable and requires amendment; and that a significantly larger share should be included for Warton in **Table 2**. The council agrees to redraft policy **SL3** in Chapter 7 to include all existing commitments in Warton. The figure for Warton in **Table 2** will also increase once the Blackfield End Farm development is added to the total.

Recommendations for change

- Delete '~~Elswick~~' from the list of **Tier 1: Larger Rural Settlements** in policy **DLF1** and add 'Elswick' to the list of **Tier 2: Smaller Rural Settlements**.

- Amend the reference from **7,700** to **7,770** new homes in policy **DLF1** and throughout the document.
- Amend the last sentence of paragraph **6.19** to read: ‘... it will become a more sustainable location for new development over the lifetime of the Local Plan.’
- Amend **Table 2: Distribution of Development to 2032** taking account of the reduced number of homes in Elswick from 140 homes down to 50 homes and the additional homes for Warton following the Inspector’s decision allowing the appeal at Blackfield End Farm.
- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate the level of development identified in the RPO version of the Local Plan.
- Redraft policy **SL3** in Chapter 7 by listing all existing commitments in Warton in the policy.

Additional recommendations for change

The following additional changes are proposed to update the text to ensure that the Settlement Hierarchy in policies **DLF1** and **S1** are amended – in accordance with the recommendations in the Settlement Hierarchy Background Paper, i.e. that Elswick should be a **Tier 2: Smaller Rural Settlement**. All recent planning decisions need to be taken on board in Chapter 6 and will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend **Table 2: Distribution of Development to 2032** taking account of the reduced number of homes in Elswick from 140 homes down to 50 homes and the additional homes for Warton following the approval at Blackfield End Farm and the existing commitments.

Chapter 7: Strategic Locations for Development, Strategic Development Sites and Non-strategic Development Sites

Chapter 7: General Comments

Number of representations:			
Comment	Support	Object	Total
0	0	4	4

Representations received from:

- Natural England
- 1 Action Group

What you said

Paragraph 7.2

Natural England commented that there appears to be a degree of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations, 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would provide certainty that housing can be delivered during the plan period. It may be that Fylde can confirm that further discussion has taken place between the council and United Utilities with respect to proposed growth and require infrastructure, taking into account recent Water Cycle Studies and the Infrastructure Delivery Plan. It would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised HRA. An example where there are uncertainties is as follows: 'It is important that the strategic development sites are accompanied by the timely provision of infrastructure, otherwise proposals will not be deliverable ...'

Paragraphs 7.1, 7.2 and 7.3

An Action Group objected to development in Wrea Green and that if the four Strategic Locations for Development will have the employment, then it is in those locations where the housing needs to be delivered – if that employment comes to fruition. The Action Group commented that timely provision of infrastructure was required in Wrea Green before the 33% increase in homes were developed, but absolutely nothing had been done. The Action Group questioned where was the requirement for local services and on-site open space provision when planning application 15/0458 was granted in Wrea Green.

Council response

The council notes Natural England's comment that there appears to be a degree of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing; and the need to resolve areas of uncertainty with United Utilities such as in paragraph 7.2. The council agrees that any uncertainty should be explored with United Utilities to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations, 2010.

The council notes the Action Group's objections regarding developments in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used regularly in the determination of planning applications across the borough, including at Wrea Green.

Recommendations for change

- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate the level of development identified in the RPO version of the Local Plan.

Policy M1: Masterplanning the Strategic Locations for Development

Number of representations:

Comment	Support	Object	Total
5	1	7	13

Representations received from:

- Lancashire County Council
- Blackpool Council
- Blackpool, Fylde and Wyre Trades Union Council
- 3 Developers
- 1 Landowner
- 1 Action Group
- 2 Residents

What you said

*Lancashire County Council commented that, in terms of criterion g) of policy **M1**, the overall housing provision in the Local Plan could bring forward the need for 6.5 additional primary forms of entry and approximately 787 secondary school places over the plan period. Depending on the position and feasibility of expansion of existing schools at the time of delivery of these developments there is a potential requirement for additional primary sites and an additional secondary school site. Given the scale of development, there may be a need to identify additional primary school sites. The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham; this site should remain within the Local Plan.*

*Blackpool Council commented that the requirement for a masterplanning approach for the Fylde-Blackpool Strategic Location for Development was welcomed, to ensure a comprehensive approach to development. However, as many of the sites in this location already have planning permission and because there are a number of different developers operating in the area, it is not clear who will actually produce a masterplan and the likely timescales for doing this. It would be useful for this to be clarified in the Publication version of the Plan. It is suggested that criterion j) of policy **M1** could be expanded to also include other development types. It is also essential that prospective developers on the Fylde-Blackpool Periphery work closely with Blackpool Council to ensure that issues relating to Blackpool and the wider area are fully taken into account and that proposals do not undermine policy in the Blackpool Core Strategy. It is therefore suggested that Fylde Council make reference to this within the supporting text or reasoned justification for policy **M1** and policy **SL2**.*

The Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs. However, new housing will bring a need for schools in

other areas as well and this is acknowledged in criterion g) of policy **M1**. The Fylde has a stable education system with a family of schools co-operating well together. The planning of new schools will need great care so that this balance is not upset and that the new schools open and expand at exactly the right times as the population grows. The new schools should certainly be community schools under democratic control and not academies or free schools, or that balance will definitely be upset, as well as bringing to the Fylde all the disadvantages of those types of school when these have been avoided in the Fylde so far.

A landowner objected to criterion b) of policy **M1** claiming concerns about the council's expectation to be able to deliver the range of housing that is suggested within the SHMA. The landowner was concerned that the council will seek to enforce a particular mix of housing which highlights a significant proportion of 1 and 2 bedroom properties. The landowner considered that the mix suggested in the SHMA could make development unviable and commercially unrealistic. The most suitable mix of housing would also be dictated by the location and the nature of the development site and would not necessarily be the same in all circumstances. The same landowner went on to object to criterion j) of policy **M1** which stipulates that housing must be located within a maximum walking distance of 400 metres to a bus stop. This places far too much emphasis on the importance of being 400 metres of a bus stop. There are three dimensions to sustainable development: economic, social and environmental. Accessibility is only one part of a wider set of considerations when deciding if a development is sustainable. The proximity to a bus stop is only one factor in assessing accessibility. The reference to 400 metres should therefore be deleted.

A landowner objected claiming that the 25 individual criteria listed in policy **M1** seem excessive, as there is a large amount of duplication and overlap between the criteria themselves, with the other development management policies within the plan (Chapters 9-14), and national guidance (Framework and NPPG). As such it is suggested this is revisited and that some criteria are removed, including criteria (v) as the SuDs hierarchy is included within the NPPG at paragraph 7-080-20150323 and within policy **CL2**. The landowner would also requested that the following criteria are combined in policy **M1**: Criteria (l) and (m) relating to encouraging public transport to reduce reliance on the private car; Criteria (n) and (t) relating to protecting and enhancing green infrastructure; Criteria (o) and (s) relating to ecological considerations and monitoring; Criteria (u) and (v) relating to drainage and flood risk.

A developer did not consider that all Strategic Locations for Development require masterplans and design codes. The developer objected to the inclusion of policy **M1** as being unnecessary and likely to slow down the development of sites. The matters dealt with in this policy could be adequately controlled by the normal development management process.

A developer commented that whilst a masterplan to cover the whole strategic location is a good idea in principle, in practical terms it would be difficult to engage all developers and operators across each of the sites to agree on a masterplan which covered the strategic location in its entirety. Masterplans for each allocation site would be more sensible and achievable. The developer recommended that the policy be reworded to allow for separate masterplans for each allocation, with the masterplans looking to contribute to a cohesive approach to the development of the strategic locations as a whole. This would enable

masterplans to be agreed in quicker timescales than if developers/operators for each allocation site were required to agree on every element of the masterplan across the entire strategic location. This would, in the long run, deliver the development strategy at the timescales envisaged in the Strategic Location Policies, rather than delivery being delayed by the preparation of masterplans. This is particularly pertinent with regards to the delivery of housing over the Plan period, especially at a time when the council admits that it cannot demonstrate a five year supply of housing land.

A developer was concerned that policy **M1** was unduly onerous and did not contain sufficient flexibility, particularly as some of the assessment criteria were subjective and would require a degree of professional judgement. Given that development must satisfy all 25 criteria of policy **M1**, this would appear to leave little room to manoeuvre should a proposal fail to satisfy one criterion, even if it satisfies the remainder. The developer considered that the term 'where possible' should be introduced, which would afford applicants and the council greater flexibility in the consideration of development proposals. This would allow the council to retain control of new development. Furthermore, the council needs to ensure that the requirements of this policy do not hinder the viability of development. The burden of combined policy requirements can impact on the viability of development to the extent where the delivery of market and affordable housing is compromised.

An Action Group objected that none of the criteria in policy **M1** was implemented prior to or as part of the approval of planning permission (15/0458) in Wrea Green. Most of the issues were raised at the Development Management Committee, after the first draft was released, but all the criteria were totally ignored and the unsustainable planning application in Wrea Green was approved.

A resident objected claiming that policy **M1** was unworkable and unsound as no site was named in Warton in policy **DLF1**.

A resident supported the following words in criterion i) of policy **M1**: 'well designed' and 'separate', in terms of on-road and off-road cycleways, as this has not happened before other than between Lytham and Warton and this is not well designed as it is not used by cyclists as it is not fit for purpose.

Paragraph 7.7

An Action Group questioned whether anything was going to happen in terms of the preparation, submission and approval of masterplans. The Action Group went on to claim that it is the piecemeal approval without any masterplan which was raised at the Development Management Committee for planning application 15/0458 – in Wrea Green – and duly ignored.

Paragraph 7.9

A resident claimed that an appeal inspector said up to 100 homes in total were sustainable in Wrea Green, but this was ignored by the Development Management Committee, so the

resident questioned how any reliance could be placed on the evaluation of sustainability in the future.

Paragraph 7.11

An Action Group objected to paragraph 7.11 which deals with infrastructure requirements in the Strategic Locations for Development because planning application 15/0458 was approved in Wrea Green without any improvement in the infrastructure as were the previous four approvals. The Action Group claimed that there had been little or no infrastructure improvements in 30 years in Wrea Green.

Paragraph 7.12

LCC commented that paragraph 7.12 should be amended to refer to secondary school provision alongside nursery and primary education provision.

A local resident commented that more people must be encouraged to cycle to achieve green ambitions, which could only be achieved in safe cycling environments, and these do not exist at this time. Proper infrastructure design, involving cyclists must be undertaken to agree how to get more people cycling and not focussed purely on existing cyclists.

Council response

The council notes LCC's comment that the overall housing provision in the Local Plan could bring forward the need for 6.5 additional primary forms of entry and approximately 787 secondary school places over the plan period. The council understands that there is a potential requirement for additional primary school sites and an additional secondary school site, all of which depend upon the position and feasibility of expansion of existing schools at the time of delivery of these developments. The council agrees to continue close working with LCC on the provision of new school places and school sites through the Education Liaison Group meetings. The council also agrees with LCC's recommendation that paragraph 7.12 be amended to refer to secondary school provision alongside nursery and primary education.

The council notes Blackpool Council's support for a masterplanning approach for the Fylde-Blackpool Periphery Strategic Location for Development. The council agrees to expand criterion j) of policy **M1** to include other development types. Blackpool Council questioned who will actually prepare the masterplans and what the likely timescales are for doing this. The first sentence in policy **M1** says that the 'masterplans will be prepared by the prospective developers, with the approval of the council. As the masterplans will become supplementary planning documents they will run alongside the Local Plan and share the same end date of 2032.

The council notes Blackpool, Fylde and Wyre Trades Union Council support for new development in Fylde, which will bring a need for new schools. The Trades Union Council's comment on the preference for community schools over academies or free schools is noted.

The council notes a landowner's objection to criterion b) of policy **M1** claiming that the requirement for a broad balance and range of housing choice in line with the Fylde Coast SHMA, 2014, would result in a significant proportion of 1 and 2 bedroom properties, which the landowner claimed could make development unviable and commercially unrealistic. The council considers that the mix required in all new residential developments should be in accordance with the most up-to-date SHMA, in line with criterion b) of policy **M1**. In addition, the council notes the landowner's objection to criterion j) of policy **M1** which stipulates that housing must be located within a maximum walking distance of 400 metres of a bus stop. The maximum walking distance 400 metres of a bus stop is a standard measurement used in sustainability appraisals.

The council agrees with a landowner's objection to the large amount of duplication and overlap between the criteria in policy **M1**. The council agrees to combine criteria n) and t), criteria o) and s), and criteria u) and v), but not to combine criteria i) and m) which deal with walking, cycleways and bridleways and with public transport respectively.

The council notes a developer's objection to the inclusion of policy **M1** as being unnecessary and likely to slow down the development of sites. The council considers the policy should be retained so as to ensure the delivery of comprehensively planned developments within the plan period.

The council agrees with a developer that masterplans for each allocation site within the Strategic Locations for Development would be more sensible and achievable, as it would be difficult to engage all developers and operators across each of the sites to agree a masterplan which covered the strategic location in its entirety. The council agrees to amend the wording in the opening sentence of policy **M1**.

The council notes a developer's comment that the requirements of this policy do not hinder the viability of development, to the extent where the delivery of market and affordable housing is compromised. The council disagrees with the developer's request for the term 'where possible' to be introduced, as it would dilute the requirements of the policy.

The council notes the Action Group's objection that none of the criteria in policy **M1** were implemented prior to or as part of the approval of planning permission (15/0458) in Wrea Green (paragraph 7.7). The Action Group also go on to claim that an appeal inspector said up to 100 homes in total were sustainable in Wrea Green, in relation to sustainable greenfield sites referred to in paragraph 7.9. The Action Group also objected to paragraph 7.11 which deals with infrastructure because planning application 15/0458 was granted in Wrea Green without any improvement in the infrastructure. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted

Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including at Wrea Green.

The council notes a resident's objection claiming policy **M1** was unworkable and unsound as no site was named in Warton in policy **DLF1**. The Warton Strategic Location for Development was mentioned in policy **DLF1** alongside the Strategic Locations for Development at Lytham and St Annes, Fylde-Blackpool-Periphery and Kirkham and Wesham.

The council notes a resident's support for the words 'well-designed' and 'separate' in relation to on-road and off-road cycleways in criterion i) of policy **M1**. The council also notes the resident's comments regarding the need to encourage more people to cycle.

Recommendations for change

- Amend the first sentence of policy **M1** to read: 'Masterplans and design codes will be prepared by the prospective developers, with the approval of the council for each allocation site within ~~of~~ the Strategic Locations for Development named in policy **DLF1**'.
- Combine criteria n) and t), criteria o) and s), and criteria u) and v) in policy **M1**.
- Add the following text to the first sentence of paragraph **7.12**: '... primary and secondary education provision'.

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Amend the second paragraph of policy **M1** to read: 'The masterplans should include ~~a phasing plan, together with~~ an agreed programme of implementation in accordance with the masterplan and an approved design code'
- Amend criterion i) of policy **M1** to read: 'Access to well-designed, separate but overlooked cycleways (both on-road and off-road), walking routes and bridleways serving the local facilities and linking to services and amenities. Opportunities should be sought for the development of a network of walking, cycling and bridleway routes;'
- Add a new criterion i) to policy **M1** and re-number the subsequent criteria accordingly: 'Energy efficiency measures should be incorporated into new developments;'

- Amend criterion j) of policy **M1** to read: ‘Housing, employment, retail and leisure facilities located within a maximum walking distance of 400 metres of a frequent, viable and accessible bus service;’
- Amend criterion k) of policy **M1** to read: ‘Secured Safety by Design principles should apply in new developments;’
- Amend criterion n) of policy **M1** to read: ‘A network of green spaces, including formal and informal recreation areas and amenity open spaces where people can congregate, linking the area to the wider Green Infrastructure network that provides for large scale landscape enhancement; together with the provision of advanced landscape planting;’
- Amend criterion o) of policy **M1** to read: ‘The conservation and enhancement of important environmental assets and natural resources, biodiversity (nature conservation) and, ecological networks ~~and formal and informal recreation areas~~—Ecological connectivity within the site and with the surroundings should be maintained and enhanced through appropriate site layout; the retention of existing important features including trees, woods and water bodies and their integration within a well-designed landscape with appropriate habitat protection;
- Amend criterion q) of policy **M1** to read: ‘To confirm the presence or otherwise of ~~sites of national importance or local~~ sub-surface archaeology, more detailed archaeological studies should be undertaken, prior to development;’
- Amend the penultimate sentence in paragraph **7.4** to read: ‘a viability assessment and a ~~phasing and~~ delivery strategy.’

Policy SL1: Lytham and St Annes Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
9	0	6	15

Representations received from:

- Natural England
- Lytham St Annes Cycle Group
- 4 Landowners
- 4 Developers
- 1 Action Group
- 2 Residents

What you said

A landowner objected to the omission from the Plan of land adjacent to The Lowlands at the corner of Division Lane and Queensway, St Annes. A number of applications have been made for development on this site, which is located in the Green Belt. The landowner requested that the site be removed from the Green Belt. This area has been in and out of Green Belt over the years. If this application had come before the planning committee in the early 80's, there would have been no Green Belt condition. Would it create a precedent? The site just finishes off that side of Division Lane, which already consists of single detached homes. It will clean up this derelict area and certainly improve the Gateway to St. Annes. The actual land on the boundary with Queensway is owned by Lancashire County Council, so any development would be buffered by this strip of land. Development of this site would clear up an area subject to fly tipping. The area has permitted agricultural uses - the approval for a pig farm over a residential development, given this gateway location, would not seem appropriate. The original development intention, back in 1957, for this site was for a detached home as per the covenant placed by Guardian Royal. With regard to environmental impact, clearly a residential development has the least impact on the environment and would complete this area once and for all. This end of Division Lane is not one of the most attractive in Fylde Borough.

*Given the infrastructure constraints at Queensway, a landowner had reservations about whether site **HSS1** would be entirely built out during the Plan period. Additional housing land ought to be identified to ensure that housing requirements are delivered. This is especially the case given that the council's housing requirement is a minimum target.*

*A landowner endorsed and supported the allocation of the Queensway site **HSS1**, but it should also include former Valentines Kennels, Wildings Lane, Lytham, which lies outside but adjacent to allocation site **HSS1**. It is noted that the site was included within the draft allocation as presented to the Development Control Management meeting on the 16 September 2015 but it was rejected by members for inclusion in the Consultation version of the RPO document. The committee meeting minutes record: Revised Preferred Option Version of the Fylde Local Plan to 2032, by way of introduction, the Chairman, Councillor Trevor Fiddler made reference to two sites (Valentine's Kennels and land east of Wildings Lane, St Annes) that had been proposed for inclusion for housing by officers in the Revised Preferred Options Document. He went on to say that the council had previously accepted their deletion when it agreed the draft version of the Revised Preferred Option at the Development Management Committee on 16th June 2015 and sought the committee's agreement that these two areas of land should not be included in the Revised Preferred Option Local Plan to 2032. Accordingly the Committee resolved that the proposed site allocations at Valentine's Kennels and land east of Wildings Lane be deleted from the Revised Preferred Options Document. It is considered that this exclusion is inappropriate and that as suggested by officers, the site should be included within the allocation. Accordingly the text in policy **SL1** should be altered to include reference to the site at **HSS1**: 'HSS1 – homes to be completed during the Plan period 1,200' and the text in paragraphs **7.14** to **7.20** inclusive should be updated to reflect this. The landowner confirmed that the site is*

available, suitable and achievable, i.e. is deliverable and can come forward now with first completions in 2016. The site was promoted to the council's Call for Non-strategic Development Sites in February 2015 and is currently the subject of an outline planning application for residential development of up to 53 homes (application ref: 14/0580). The application is currently pending determination and will be presented to Development Management committee with a recommendation for approval on Wednesday 9th December 2015. Copies of the committee report, the site location plan and illustrative layout plan were submitted by the landowner.

A landowner objected to the optimistic delivery rates assumed at the Queensway development in Lytham and St Annes (policy **SL1**) which is expected to deliver 1,150 homes between 2015 and 2032, equating to 68 a year, a delivery rate which is likely to rise given that there have been no completions to date on the site. Furthermore, whilst the outline consent granted 1,150 homes, the only Reserved Matters scheme to currently have consent (Ref: 13/0257) is for 110 homes, which is just 10% of this total. It is also understood that there is some uncertainty around the future of the developer due to a recent bereavement. On this basis we also object to the level of proposed delivery at this site.

A landowner submitted a representation relating mainly to two sites which were previously allocated in the Fylde Local Plan to 2030 (Part 1): **Preferred Options sites as H2** (Land West of North House Lane) and **H3** (Land North of Moss Hall Lane), but have now been deleted from the Revised Preferred Options. For ease of reference, the sites will be referred to as **H2** and **H3** throughout this representation. A landowner objected to the omission of sites **H2** and **H3** from the RPO version of the Local Plan. Despite being designated as a Biological Heritage Site and being excluded from the site allocations in the Revised Preferred Options (LSA map 2 of 4), an outline planning application (14/0580) for up to 53No homes on part of site **H2** has recently been recommended for approval by Officers of Fylde Borough Council and will be presented at Development Management Committee on the 9th December 2015. In summary, the Committee report provides that the proposed housing scheme would represent sustainable development, despite the loss of the Biological Heritage Site due to its designation no longer being applicable. This development would complement the approved Queensway scheme and demonstrates that a clear precedent has been set for new residential development in this area, even where Biological Heritage Site status applies. The council's Strategic Housing Land Availability Assessment 2015 (update) demonstrates that there is not enough land within the defined settlements (as defined in the Fylde Borough Local Plan October 2005) to meet Fylde's housing requirement and that some sustainable greenfield sites on the edge of settlements will need to be allocated for housing. Despite the designation of sites **H2** and **H3** (designations from the Preferred Option version of the Local Plan) as part of the wider Lytham Moss Biological Heritage Site, recent surveys undertaken by various qualified ecologists provide evidence that these sites are not used by wintering birds, namely Pink Footed Geese, Whooper Swans and Bewick Swans as they have no substantive value as feeding ground for these bird species. The sites are suitable for housing and an appropriate scheme would provide mitigation and biodiversity enhancements, including the option of additional conservation land to secure development on these sites. The allocation of these sites for housing would deliver sustainable development in the strategic location of St Annes and would bring substantial economic, social and environmental benefits. The sites are entirely available and deliverable. Sites **H2** and **H3** have

previously been allocated in the Fylde Local Plan to 2030 Part 1: Preferred Options as strategic locations for development. From information provided by LERN (Lancashire County Council) the sites were designated as BHS in 2010 and were therefore already designated when they were allocated in the Preferred Options in 2013. The justification and evidence behind these sites being deleted in the Revised Preferred Options has not been provided by the Local Planning Authority. It is respectfully requested that this information is provided as soon as possible as there has been no change in circumstances to warrant deletion of these sites from the Revised Preferred Options. Accordingly, there are no overriding reasons or material considerations to indicate that sites **H2** and **H3** should be deleted from the Revised Preferred Options and it is therefore respectfully requested that sites **H2** and **H3** are allocated for housing and included in policy **SL1** (Lytham St Annes Strategic Location for Development). It should also be recognised that positive pre-application discussions have been on-going for some time with senior officers of Fylde Borough Council in order to bring forward these sites on a phased basis for residential development and to deliver the key infrastructure that the area needs, including contributions towards the Heyhouses Bypass. Up until the point of the release of the draft Revised Preferred Options document to Development Management Committee in June 2015, the Council were supportive of housing on sites **H2** and **H3** and as such significant resources and money have been invested into these schemes. Sites **H2** and **H3** are immediately adjacent to the settlement boundary of St Annes and also adjacent to the housing commitment **HSS1** Queensway, and the current housing application at Valentines Kennels (part of site **H2**). The sites are well related to the built form of St Annes, and would be seen in this urban context, particularly when the adjacent sites are constructed and the area is more urbanised. Recent discussions have also been held with Lancashire County Council Highway Authority in relation to financial contributions to the funding of the scheme and highways capacity and they are supportive of the development of these sites. Sites **H2** and **H3** would be developed with a master-planned approach (in line with policy M1), taking into account adjacent developments (such as Queensway) and would also support key highways and transport infrastructure, in particular the Heyhouses link road, through significant financial contributions, enabling this to come forward sooner, rather than later. Ultimately, the recommendation is that sites **H2** and **H3** are not included in the Revised Preferred options because the sites have been designated as a Biological Heritage Site (BHS). From information provided by LERN (Lancashire County Council) the sites were designated in 2010 and were therefore already Biological Heritage Sites when they were allocated in the Preferred Options in 2013. The justification and evidence behind these sites being deleted in the Revised Preferred Options has not been provided by the Local Planning Authority.

A landowner considered that the proposed site allocation **ES3** Boundary Road, Lytham should be promoted as a mixed use site, to comprise mainly employment uses but together with an element of retail. Any such amendment to this proposed allocation will ensure that both appropriate infrastructure can be delivered and has capacity to accommodate identified growth, whilst also meeting local need and enhancing the local sense of distinctiveness. Land at Boundary Road comprises vacant land, approximately 0.7 Ha. Surrounding uses comprise mainly retail, commercial and industrial premises, with residential uses further to the west. The site itself is highly accessible by local road links, and is also within 250 metres of bus stops along Lytham Road which offer regular services between Preston and Lytham. The proposed site is therefore considered to be sustainably

located. The utilisation of the site for a mix of employment and retail/specialist uses would have a particularly positive impact on the area in terms of meeting the employment development needs of the Borough and this part of the Fylde in particular, as well as helping to achieve sustainable development and contributing to the local economy. What is more, allocating the site for a future mixed use would complement and enhance adjacent, similar uses. Save for the industrial types uses further north along Boundary Road, the wider site largely consists of residential homes. Therefore, proposing an element of retail on the site would benefit local residents' wellbeing and sense of place, indeed supporting paragraphs **9.31** and **9.33** of the RPO, which both support the view that the site should be promoted for a mixed use rather than exclusive employment uses. The potential for the site to deliver employment uses is greatly enhanced with the additional of some other uses which can drive a scheme forward and ensure the delivery of development on this site in the plan period. The provision of modern business premises for the Borough at the right time and in the right place will bolster the employment strategy set out in the RPO, part of this growth for Lytham and provide a popular and attractive business location that would encourage the growth of local businesses and attract inward investment to drive the local economy. Furthermore, it is considered that a mixed use development of the land would help to support Warton's status as a strategic location for development. Provision of land at Boundary Road, Lytham for this use will be benefit to local residents and those passing through along Preston Road, will therefore contribute to the local economy and will support the employment and retail aspirations of the plan. It is therefore requested that for the reasons outlined above, that the council consider further flexibility in respect of the site identified and that the allocation be amended in the emerging Local Plan to be allow future potential for a mixed use development.

A developer supported the allocation of the site south of Queensway as a housing allocation for 1,150 homes as site **HSS1**. As demonstrated by the planning permissions in place it will provide a continuous supply of housing to serve St. Annes over the plan period. The developer questioned the allocation of land at Lytham Quays for 120 homes as site **HSS3**. This site has been almost entirely developed and the suggestion that it will be a resource going forward is misleading. The developer objected to the inclusion of 0.9Ha of land at Dock Road (site **ES2**) as a strategic location for employment. Firstly, the developer does not accept that a site of 0.9Ha can be regarded as strategic as it fails to meet the criteria for such sites. Secondly, the land has been available for development for several years with no realistic proposals being put forward. The land is poorly located for employment and should not be allocated for such uses. The developer therefore considered the land at Dock Road should be allocated for housing as a Non-Strategic Development Site within the built up area of Lytham.

A developer was concerned with the reliance placed on 10 sites to deliver 80% of the housing requirement for the Borough, particularly the significant reliance placed on sites in Lytham St. Annes and the Fylde-Blackpool Periphery. In Lytham St. Annes, the delivery rates will be slowed due to the infrastructure required to facilitate the development, such as the Heyhouses Link Road. Site **HSS1** – Queensway, is situated to the north of St. Annes, between Heyhouses Way and North House Lane, and Kensington Developments has been granted outline planning permission for residential development of up to 1,050 homes in 29th April 2009. Permission for reserved matters occurred in April 2015 for 110 homes. A further

reserved matters application was submitted in June 2015 for 927 homes. The application is still pending a decision. The Housing Trajectory in **Appendix 2** of the RPO documents states the site will deliver 60-75 homes per annum between 2016 and 2032. The Plan is unclear what assumptions are being applied by the Council relating to the delivery rates of this site. The developer considers the consistent delivery 60-75 homes per annum on this site to be unrealistic for one developer, in reality it is more likely to be 30dph, at best. Delivery rates will also be slowed due to the infrastructure required to facilitate the development. This includes the implementation of the new Heyhouses Link Road, which as **Appendix 2** of the draft Infrastructure Development Plan (September, 2015) confirms does not have committed capital to implement. It is unlikely that the full 1,150 homes will be delivered within this plan period. At a more realistic delivery rate of 30dpa, it is expected the site will deliver at best 630 homes over the plan period. To ensure the full objectively assessed housing of this plan period are met in full there is the need for further sites to be allocated as part of the Local Plan. Site **HSS2** is a residential site situated within the urban area, off Heyhouses Lane, and has an allocation for 250 homes. Two thirds of the site benefits from planning permission for a mix of uses, including the provision of 162 homes. This development commenced in 2014 and is expected to be completed in 2020. Paragraph **7.21** of the RPO document states one third of the site remains occupied by Electronic Data Systems (EDS). The Council has produced no up-to-date evidence that the site will be available for development within the plan period. Until such evidence is provided the developer objects to the allocation of this part of the site within the Local Plan. Site **HSS3** – Lytham Quays, Lytham is a residential site on the eastern boundary of Lytham and has planning permission for 120 homes. Development commenced in 2007/2008 and is expected to be complete in 2016. The developer accepts that this site will contribute towards Fylde's housing requirement within the plan period. There does not appear to be any contingency or policy mechanism in place through which the council can respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

A developer suggested including the former council site at Heeley Road, St Annes as a housing allocation, as well as the two adjacent parcels that already have planning permission.

A resident objected claiming that, at a previous Local Plan Review, a site was proposed for Countryside (maybe even Green Belt). However, prior to formal designation, a planning application was submitted for Industry. As a result, Fylde Council withdrew from the appeal which was allowed as a result. Nevertheless the Inspector remarked upon the importance of the site in open space terms and recommended it be kept open and landscaped alongside the Queensway frontage. No development has ever taken place. It is understood that the ground conditions are very poor for industrial use. So some 10 years down the line, the site remains an eyesore containing permanent For Sale signs and fly-posting. The resident requested that the site be returned to Countryside in the Local Plan. Some of the frontage is required for the proposed Queensway roundabout. The agents for the site are CBRE who are leading figures in the Airport Master Plan. If the Council is minded to release Green Belt land north of the runway as proposed in the Enterprise Zone Master Plan, then this site's designation and landscape implementation should be agreed as a quid pro quo. This site intrudes into the openness of the Green Belt.

Paragraph 7.20

An Action Group objected claiming if the four Strategic Locations will have the employment, then it is in those locations where the housing needs to be developed - if that employment comes to fruition. This was required in Wrea Green before the 33% increase in homes, but absolutely nothing has been done. Even an Appeal Inspector's defined 'up to 100 homes in total' has been exceeded by nearly 40%.

Paragraph 7.21

*A developer objected to the allocation of a third of site **HSS2** – Heyhouses Lane, St Annes which remains occupied by Electronic Data Systems (EDS). The council has produced no up-to-date evidence that the site will be available for development within the plan period. Until such evidence is provided there is an objection to the allocation of this part of the site in the Local Plan.*

Paragraph 7.23

*A developer accepted that site **HSS3** – Lytham Quays, Lytham will contribute towards Fylde's housing requirement within the plan period. The site has planning permission for 120 homes and development commenced in 2007/2008 and is expected to be complete in 2016.*

Paragraphs 7.24 and 7.25

Natural England commented that there appears to be a degree of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations, 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would provide certainty that housing can be delivered during the plan period. It may be that Fylde can confirm that further discussion has taken place between the council and United Utilities with respect to proposed growth and require infrastructure, taking into account recent Water Cycle Studies and the Infrastructure Delivery Plan. It would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised Habitat Regulations Assessment. Two examples where there are uncertainties are as follows: 'Foul and surface water runs into the same combined sewer and this can result in flooding problems and detrimental effects on bathing water quality along the Fylde Coast, especially during periods of heavy rainfall and storm surges. A number of watercourses in the area discharge to the combined sewage system. There is some limited capacity in the combined sewer system. However, additional loading of the system caused by further development could impact upon overflow spills into the Ribble Estuary and exacerbate effects on bathing water quality, notifiable features and tourism. Therefore, discharges to the combined sewer system will only be permitted as a last resort'

and 'Infrastructure capacity for wastewater and water supply is limited for Queensway, St Annes (site **HSS1**)'.

An Action Group objected to paragraph 7.24 as the issue of combined sewers exists in the centre of Wrea Green as well, but this was totally ignored and planning applications have been approved for development in Wrea Green.

Paragraph 7.28

An Action Group objected that there is a significant shortfall of primary school places elsewhere in the Borough but this did not stop applications being granted planning permission.

Paragraph 7.29

Lytham St Annes Cycle Group objected claiming that: development at site **HSS1** - Queensway should incorporate a designated cycle route to connect the proposed Northhouses Lane cyclepath (to St Annes) via Wildings Lane and Singleton Ave. The existing Lytham Moss bridleways (within the approved development site) should be protected and improved within the overall site layout. The opportunity should be taken to connect the end of the Queensway cycle path with the Blackpool cycle network. This will necessitate liaison with both LCC and Blackpool Council to identify a suitable route. Development at site **HSS2** - Heyhouses Lane, St Annes should contain access for pedestrians and cyclists from Shepherd Road. The only current means of access appears to be from Heyhouses Lane. Development at site **HSS3** - Lytham Quays/Dock Road should include extending the promenade around the outer perimeter of the former Land Registry. Development at site **ES3** - Boundary Road, Lytham should include a shared path designated on the north side of Preston Road between Boundary Road and Saltcoates Road. This would avoid the necessity for cyclists to ride along the adjacent length of Preston Road.

A resident commented on the current cycle paths involve cycling on and off pavements, short broken paths, harsh turns and are ignored by almost all cyclists as not fit for purpose. The resident claims that LCC and Fylde Council have spent a lot of money on badly planned, badly designed paths, purely to tick boxes but do not encourage cycling and are a waste of money. Proper space for cycling must be in the first level of design as it will take some of the road and pavement space to be effective.

Council response

The council notes a landowner's and a resident's objections to the omission from policy **SL1** of Land adjacent to the Lowlands at the corner of Division Lane and Queensway, in St Annes from policy **SL1** (see map at back of the Responses Report). The site is located within the Green Belt. Residential development would constitute inappropriate development within the Green Belt. The council has decided that no strategic review of the Green Belt within Fylde will be undertaken when preparing the Local Plan.

The council notes the comment made by two landowners and a developer questioning whether site **HSS1** – Queensway, St Annes would be entirely built out during the plan period. The Housing Trajectory in **Appendix 2** of the RPO version of the Local Plan demonstrates that all 1,150 homes on land at Queensway will be delivered within the plan period, which ends on 31st March 2032. The council does not consider it necessary to identify additional sites above and beyond those already allocate in the RPO version of the Local Plan.

The council notes a landowner's support for the inclusion of site **HSS1** – Queensway, St Annes, but also the request that the former Valentine's Kennels on Wildings Lane, which lies adjacent to site **HSS1** be included within the Local Plan. The Development Management Committee resolved, at its meeting on 16th September 2015, to remove the Valentine's Kennels site from the RPO version of the Local Plan. The site was removed from the RPO version of the Local Plan as the council considers that the site is not necessary as there are sufficient sites in the plan to meet the housing requirement figure set out in policy **H1** in Chapter 10.

The council notes a landowner's objection to the omission of site **H2** – Land West of North House Lane, St Annes and site **H3** – Land North of Moss Hall Lane, Lytham from the RPO version of the Local Plan (see map at back of the Responses Report). The council has excluded the two sites from the RPO version because the majority of site **H2** is designated as a Biological Heritage Site (BHS); and part of site **H3** is designated as a BHS.

The council notes a landowner's objection that site allocation **ES3** (employment site) – Boundary Road, Lytham should be promoted as a mixed use site, comprising mainly employment uses but with an element of retail development. The council considers that retail development should be focussed on town, district and local centres, in accordance with policy **EC4** in Chapter 9; and that site **ES3** should be retained solely for employment uses.

The council notes a developer's support for the allocation of site **HSS1** – Queensway, St Annes and the objection to the allocation of site **HSS3** - Land at Lytham Quays, Lytham for 120 homes. This site has planning permission and will deliver 120 homes in the plan period. The site has been included in the Local Plan as a commitment. This site had completions in 2011 and is expected to be completed in 2016. The council notes the developer's objection to site **ES2** – Dock Road, Lytham, comprising of 0.9Ha of land being included as a strategic location for employment and that it should be allocated for housing as a non-strategic development site within the built-up area of Lytham. Site **ES2** – Dock Road, Lytham is a long-standing employment allocation in the existing Fylde Borough Local Plan (As Altered), October 2005 and should be retained for such use in the emerging Local Plan.

The council notes a developer's objection to site **HSS2** – Heyhouses Lane, St Annes, claiming that, as paragraph **7.21** says - one third of the site remains occupied by Electronic Data Systems (EDS), the site will therefore not be available for development within the plan period. A planning application for housing on the land occupied by Electronic Data Systems (EDS) has been submitted to the council for determination, since the consultation commenced into the RPO version of the Local Plan. Consequently, developers are interested

in developing the remaining third of the site within the plan period. The council notes the developer's support for the allocation of site **HSS3** – Lytham Quays in the Local Plan. The developer's objection regarding a shortfall in housing should the Strategic Locations fail to come forward is dealt with under policy **H1** in Chapter 10.

The council notes a developer's request for the former council site at Heeley Road, in St Annes to be allocated for housing. Outline planning permission (08/0092) has been granted with a Section 106 Agreement for the development of Fairways Garage, Heeley Road and CMVU Depot, on Heeley Road, St Annes. The site is in the same ownership as CMVU depot (SHLAA site ref. **SA67**) so there is the opportunity to combine both sites thereby substantially increasing the number of homes. The site has been taken forward as a commitment in the Local Plan.

Paragraph 7.20

The council notes an Action Group's comments regarding focussing development in the four Strategic Locations for Development, rather than in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including at Wrea Green.

Paragraphs 7.24 and 7.25

The council notes Natural England's concern that there appears to be a level of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. The council agrees to hold discussions with United Utilities with respect to proposed developments and the provision of necessary infrastructure to deal with foul and surface water.

The council notes an Action Group's objection that the issue of combined sewers exists in Wrea Green, but that this was ignored and planning permissions have been granted. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal.

Paragraph 7.28

The council notes an Action Group's objection that there is a shortfall of primary school places, but this did not stop the granting of planning permission in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal.

Paragraph 7.29

The council notes the comments made by the Lytham St Annes Cycle Group and a resident regarding cycleways in the Lytham and St Annes Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- Amend the second sentence in policy **SL1** to read: 'An agreed masterplans and an approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the wider Lytham and St Annes Strategic Location for Development, which ~~will be~~ are shown on the Policies Map ...'
- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate the level of development identified in the RPO version of the Local Plan.

Additional recommendations for change

The following additional changes are proposed to ensure that the site at Heyhouses Lane, in St Annes is correctly listed as a mixed-use site in policy **SL1**, which will appear in the Publication version of the Local Plan; and that all references to phasing are removed from the document.

Additional textual changes

- Amend the first sentence in policy **SL1** to read: 'Proposals for development of the following strategic sites identified on the ~~Inset Maps~~ Policies Map at the back of accompanying this plan will be supported as follows:'
- Amend the following site reference in policy **SL1** and the supporting text: '~~HSS2~~ **MUS4** – Heyhouses Lane, St Annes'.
- Amend the last sentence of policy **SL1** to read: 'A ~~phasing plan should be submitted by the applicant; and a~~ programme of implementation should be agreed by between the council and the developer in accordance with the masterplans and the design codes.'

Policy SL2: The Fylde-Blackpool Periphery Strategic Location for Development

Number of representations:			
Comment	Support	Object	Total
15	36	12	63

Representations received from:

- Highways England
- Lancashire County Council
- Blackpool Council
- Lytham St Annes Cycle Group
- 3 Developers
- 5 Landowners
- 1 Action Group
- 17 Residents

What you said

*Highways England supported the overall distribution of development. Notwithstanding this, it was previously identified that a suitable evidence base was needed in order to consider the implications of new development on the safe and efficient operation of the Strategic Road Network; and that appropriate measures should be identified to support the proposed level of development. Highways England, in September, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report' that included the stated level of development in this policy (noting a small difference in relation to the quantum of development at site **HSS6**). It is not clear if any further evidence has been developed, beyond that initial assessment, that would enable Highways England to make further comments on these development proposal (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. It intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions.*

Lancashire County Council commented that the Blackpool Airport Corridor Enterprise Zone needs to be referenced and considered throughout the Local Plan as appropriate, including a new policy for the site and the implications for infrastructure requirements.

*Lancashire County Council welcomed the mixed use allocation at Marton Estate within Strategic Site **MUS1**. It would, however, make sense to see some flexibility in terms of the exact numbers of homes particularly given that recent planning permissions and applications mean that the likelihood is that the site will accommodate up to 446 homes. Furthermore, it is not considered appropriate to produce a masterplan for this strategic site given the advanced stage of the planning applications.*

*Blackpool Council commented that schemes at the Fylde-Blackpool Periphery are likely to have significant impacts on Blackpool. The requirement for a masterplanning approach for the Fylde-Blackpool Strategic Location is welcomed, to ensure a comprehensive approach to development. However, as many of the sites in this location already have planning permission and because there are a number of different developers operating in the area, it is not clear who will actually produce a masterplan and the likely timescales for doing this. It would be useful for this to be clarified in the Publication version of the Plan. It is suggested that Criterion j) of policy **M1** could be expanded to also include other development types. It is also essential that prospective developers on the Fylde-Blackpool Periphery work closely with Blackpool Council to ensure that issues relating to Blackpool and the wider area are fully taken into account and that proposals do not undermine policy in the Blackpool Core Strategy. It is therefore suggested that Fylde Council make reference to this within the supporting text or reasoned justification for policies **M1** and **SL2**.*

*Blackpool Council commented that the concentration of development proposed at the Fylde-Blackpool periphery will have impacts for Blackpool in terms of its services and infrastructure. The allocations in total will impact on the local and strategic highway networks. It is suggested that the quantum of development trips should be made available, together with the distribution of traffic, so assessments on the operations of key links and junctions on the networks (Lancashire County Council, Highways England and Blackpool networks) can take place. It is vital that reference is made in the Local Plan to the fact that some of the infrastructure requirements at the Fylde-Blackpool Periphery fall within Blackpool and that monies may need to be provided to Blackpool Council to make the development acceptable. This could be provided in the supporting text/reasoned justifications to policies **SL2** and **INF2**. The total objectively assessed housing need for Blackpool, as set out in the Core Strategy and accepted by the Inspector, is 4,200 homes between 2012 and 2027. The approach taken in the RPO provides for a further 2,622 homes on the edge of Blackpool (until 2032), which increases the total number of additional homes in the Blackpool built-up area by over 60% and means that over 6,800 new homes are proposed. Blackpool has concerns about the quantity of development proposed in this location and its potential impacts. New development on the Fylde-Blackpool Periphery will increase the supply of housing in the Blackpool built-up area and provide increased competition in the Blackpool housing market, which does not have an infinite capacity. It may discourage developers from purchasing land in Blackpool itself, delaying starts, or building at slower build-out rates because of the increased supply in the local area. This could have implications for Blackpool's housing strategy because there would be slower growth in the town itself, leading to lower levels of New Homes Bonus and commuted sum payments, with subsequent negative impacts for inner area regeneration. It is accepted that approximately 80% of the homes proposed on the Fylde-Blackpool Periphery have planning permission, or are subject to current planning applications. Therefore, they are already progressing and are not dependent upon allocation in the Local Plan. However, site **HSS5** (Cropper Road West), where 442 homes are proposed, does not currently have planning permission and is not subject to a planning application. Planning permission has recently been granted at appeal for up to 360 additional homes in Warton on land that is not proposed in the RPO (or the Bryning with Warton neighbourhood Plan). This permission increases the overall housing supply within Fylde and therefore it is suggested that the proposed housing allocations in the RPO should be revisited because there is no longer a*

need to allocate all of the land that is currently proposed for housing. Blackpool Council suggests that site **HSS5** (Cropper Road West) could be de-allocated to reduce the likelihood of the proposed housing allocations on the Fylde-Blackpool Periphery impacting negatively upon Blackpool's housing strategy, and also to reduce the impact on infrastructure and services in the South Blackpool area. Blackpool would therefore welcome the opportunity through the Duty to Co-operate to explore with Fylde the possibility of including a specific policy within the Fylde Local Plan relating to housing on the Blackpool periphery. The policy would provide the basis to enable off-site payments for affordable housing for expenditure in Blackpool, where deemed appropriate.

Lytham St Annes Cycle Group objected to site **HSS4** - the Coastal Dunes claiming the development should incorporate a designated cycle route from Starr Gate railway station to emerge at the farther end of the development and emerge along Clifton Drive North. Ideally, this route should continue through the Starr Hills nature reserve (alongside the railway fence) to emerge further down Clifton Drive North (or into Kilgrimol Gardens). The Cycle Group claimed that Cropper Road should be inaccessible to motorised through traffic. Cropper Road is the natural continuation of the proposed cyclepath along Wild Lane. Currently traffic calmed, it is important to prevent this road becoming a high speed rat run to/from the M55. In terms of site **MUS2** - Whyndyke Farm, a new cycle route should be provided from Mythop Road alongside the Borough boundary to connect with National Cycle Network 62 at Staining. This would provide a direct cycle access from the Whyndyke Farm to the existing Blackpool cycle network.

A landowner commented that the emerging Local Plan seeks to identify the vast majority of new employment allocations with the Fylde / Blackpool Periphery Strategic Location for development. Of the total 56.3 hectares of new employment land allocations, some 47.4 Ha. (85%) is located in the Fylde-Blackpool Periphery Strategic Location for Development (policy **SL2**). Even accounting for the expected delivery of some of the requirements for Blackpool with the Fylde area, there is a clear and unacceptable concentration of employment land in a small area on the very periphery of the Fylde Borough. In this regard the total employment land provision for Kirkham/Wesham is 1.1 Ha. (Mill Farm). Even assuming this requirement is met, a more reasonable apportionment of employment land provision across the various principal settlements would suggest that for Kirkham/Wesham (with 15% of the Borough's population) allocations of around 8-10 Ha would be appropriate. The site at Corner Hall Farm is extremely well placed to meet this need in a location which would be most attractive to the market and both indigenous and incoming business.

Wild Lane and Peel Road Landowners collectively control the land at Whitehills between Peel Road and Wild Lane extending south from the Cropper Road, Whitehill Road and B5410 roundabout. The northern portion of the combined landholding was included in the SHLAA (site ref. **BP13**) and deemed to be developable with an anticipated capacity of 956 no. homes. This area and land to the south was also put forward as a potential Strategic Site in response to the 2015 Call for Strategic Development **Sites Refs. 19, 44, 64, 66, 86, 90 and 96**, and is shown as an Additional Strategic Site on the Sites Assessments Background Paper (October 2015) land referencing map. Joint and individual comments submitted by the Landowners in response to the Council's Call for Strategic Development Sites of 13th January 2015 specifically focussed on the land west of Peel Road, confirmed their land was

collectively available and the detailed comments submitted by Steven Abbott Associates LLP, demonstrated that it was suitable for development and that substantial residential or mixed-use development could readily be achieved. The opportunity to explore the potential of the land between Wild Lane and Peel Road resulted from the overall response to the first Preferred Option Local Plan consultation in 2013, which highlighted the mismatch between the proposed levels of growth at the other Strategic Locations for Development and especially at Warton. The case made by the Landowners and Steven Abbott Associates LLP in response to the Call for Strategic Development Sites confirms; the land offers a logical and sound area of search for a strategic development site due to its close proximity to existing services, facilities and infrastructure (and to a lesser extent, Lytham St Annes, albeit this will be increased following completion of the M55 / Heyhouses Link Road); in landscape and environmental terms, the general area is not of high quality; opportunities exist to provide a sustainable urban extension which can meet development needs over the whole plan period, and; published SHLAA information demonstrates that the northern part of the land is considered to be suitable and deliverable for development, and this applies equally to the balance of the land outside the area included in the SHLAA. The land therefore represents a sound option for development and offers the opportunity to deliver a scale and quantum of development that enables a sustainable new community to be created and a holistic and comprehensive approach to be taken to meeting full, objectively assessed development needs. The council will be aware that this approach was advocated in the M55 Hub proposals developed jointly with Blackpool Council and presented to Fylde Cabinet Members in July 2009. Whilst that particular initiative is no longer being pursued, the aims and objectives presented in the M55 Hub Prospectus and masterplan continue to have merit and several aspects of the development have / will be delivered and are incorporated into the proposed land allocations within the Whitehills part of the Fylde-Blackpool Periphery Strategic Location for Development. These include the mixed use allocation at Whyndyke Farm which also benefits from outline planning permission; the mixed use allocation at Cropper Road East, and the various housing and employment allocations and commitments within the Whitehills development area (also supported by the Whitehills Development Appraisal and Masterplan of October 2013). A further quadrant of the former M55 vision will be delivered by the neighbourhood planning approach advocated by the Blackpool Local Plan Part 1 - Core Strategy for Marton Moss which is nearing adoption. The only component of the M55 concept that has not been delivered by other means, is the growth and country park extending south from Whitehills Road and enclosed by the committed M55 / Heyhouses Link Road. The Council put forward a number of reasons why the Landowners' collective landholding was not taken forward as an Additional Strategic Site as earmarked in the Sites Assessments Background Paper (October 2015). This confirms there are no insurmountable technical or environmental constraints preventing development and that the principal reason for rejecting the site was the consideration that focusing greater development in the area would lead to an over-concentration in the Fylde-Blackpool Periphery Strategic Location for Development. The Council's response to a number of the Call for Strategic Development Sites land nominations also includes the reason that the M55 and its slip roads is considered to be a barrier to movement within the wider area. The Landowners' response to these comments is that as the M55 Hub prospectus demonstrates, and the previous comments by Steven Abbot Associates LLP confirm, a purposeful concentration of development in the area, planned as a comprehensive, holistic new community, can deliver benefits over dispersed growth at Key and Local Service Centres and can have added long-term value and lower

overall / shared infrastructure costs. The comment that the M55 also restricts movement between the area and the wider Borough is also firmly disputed. The Whitehills area at Junction 4 of the M55 is one of the most accessible locations in Fylde and the reason why major employers like the Department of Work and Pensions are located at Whitehills. In addition, the construction of the M55 / Heyhouses Link Road will improve accessibility and connect the area to Lytham St Annes. The road is fully funded and expected to be complete by 2020. In conclusion, Wild Lane and Peel Road Landowners consider that by overlooking the potential of the land within their collective ownership between Wild Lane and Peel Road (**Site Refs. 19, 44, 64, 66, 86, 90 and 96**) to provide an additional housing (or mixed use) allocation / additional strategic site, or an area of search, proposed policy **SL2** is flawed. The policy should be revised to ensure the land is included in the next version of the Local Plan.

A landowner objected to the increased delivery targets at Whyndyke Farm site (**MUS2**) within the Fylde-Blackpool Periphery Strategic Location for Development (policy **SL2**), following the reduction in numbers in Warton, as was suggested in the July 2014 responses document. Policy **SL2** indicates that 1,310 homes will now be completed at Whyndyke Farm between 2018 and 2032 (up from 500 by 2030 within the 2013 Preferred Options) which equates to an average delivery rate of 94 per year, with the trajectory at **Appendix 2** indicating delivery rates of up to 110 dpa in the latter parts of the plan period. This level of delivery is considered to be extremely optimistic, particularly given that the site has only just been gained outline consent (October 2015) and has significant infrastructure and drainage constraints. As such, the landowner strongly objected to the level of delivery proposed for this site and considered that this should be reduced to somewhere nearer the 500 homes anticipated within the previous version of the Preferred Options in 2013, which is a much more realistic assessment.

A landowner objected that Land and Property in the Vicinity of Peel Hill Farm, Peel Road, Blackpool - is suitable, available and deliverable to meet strategic / long term development needs. The landowner considered that the emerging Plan was not sound as it underestimates the objectively assessed housing needs and provides no real element for growth. The delivery of the Plan relies on smaller sites and windfalls and contains a very limited buffer for under-delivery. The opportunity exists for a sustainable strategic scale development opportunity on the southern Blackpool fringe. The landowner has engaged positively with adjoining landowners and is aware that there is a collective spirit to promote a sustainable strategic development site in this broad location. Full consideration must be given to this option.

A landowner sought the allocation of 2 Ha of land both for Blackpool South Caravan Club purposes and for residential development, on land north east of Cropper Road. The site is currently within the Countryside area close to allocated employment land and residential developments. If the club is to remain in situ on their current site on Cropper Road they will need to expand onto the land to the north east. This land is favourable for the extension of the caravan club site as it is directly adjacent to the current boundary of the site, the site is not under any environmental designations and will allow for the caravan club to retain this site and continue to operate in the area supporting the tourism industry and local employment. The Caravan Club recognise however that the land directly to the south of their site is promoted for housing and can see the logic of this being extended over their site. The

Caravan Club would however only be willing to agree to this if they could relocate to the land on the opposite side of Cropper Road. The Caravan Club therefore ask that this land is safeguarded for caravan use if housing use on the existing site is desired. The housing development would need to cross subsidise the relocation process, should this action be preferred the site would be available immediately following the relocation.

A landowner objected to the omission of their land from the RPO version of the Local Plan, claiming the site is not and has never been agricultural and measures over 2 acres in size. However, currently it is restricted to a small 2-3 bedroom bungalow dramatically reducing the potential regarding sale value. The site is countryside, but is not in agriculture use. It is not favourable, nor does it have character, or is it attractive or open. Development of this site would deliver housing in a location that is not visually detrimental or isolated. Progress Way (the A5230) encompasses the site along the southern and eastern boundary. This has resulted in a massive increase in traffic including HGV, along with other commercial vehicles and domestic traffic. This has reduced the countryside effect considerably. Due to the increase in the road infrastructure, the council has allowed several Industrial parks in the immediate vicinity, namely 'Arkwright Court', situated approximately 200 metres to the east of the site as well as a number of units on Dickes Lane, only 3m from the site. Notwithstanding the industrial units, there are approximately, 9x2 storey homes in the immediate vicinity of the site, which have been built or extended between 1990 and 2010. Furthermore, nurseries on Whitehills Lane have been turned into a housing estate. A builder has put up a sign for homes for sale on Cropper Road and then applied for planning permission. Homes are being built on Runnell Farm on Midgeland Road, Baguly Nurseries on Midgeland Road. The landowner claims that the countryside term is denying residents the ability to build new homes, but big developers can build on farmland.

*A developer is currently developing the first phase of development on site **HSS4** - Coastal Dunes, and will shortly submit full planning (EIA) on the second, northern phase to increase the numbers from the existing outline approval. The technical and supporting work undertaken to date supports a higher housing figure on this site of 429 homes, whilst still meeting the council's planning policies.*

*A developer endorsed and supported the allocation of land at Cropper Road West, Whitehills (site **HSS5**) in the Plan for 442 homes. Policy **SL2** (The Fylde-Blackpool Periphery Strategic Location for Development) sets out a number of proposals for development of the following strategic sites identified on the Inset Maps. Our client's site **HSS5** is set out in the policy with a projected commencement date of 2020. The developer considers the site could come forward early with first completions in 2017/18. 'An agreed masterplan and an approved design code for the comprehensive development of the wider Fylde-Blackpool Periphery Strategic Location for Development, which includes land along the Blackpool Airport Corridor at Squires Gate, which will be shown on the **Policies Map**, should make provision for a range of land uses to include homes, employment and commercial uses, Green Infrastructure network and community facilities. A phasing plan should be submitted by the applicant; and a programme of implementation agreed by the Council in accordance with the masterplan and the design code.' On reading the above it would be inferred that there should be an agreed masterplan for the all the sites listed. The developer considers that this should not be the case and indeed paragraph **7.39** of the Plan states that for site **HSS5** that any proposal*

for the site should be accompanied by a comprehensive masterplan agreed with the Council. This clearly refers to this site only and not the wider sites allocated in policy **SL2**. A masterplan was submitted by the developer with the representations and welcomed further discussion with the Council on this and to have an agreed masterplan that all parties could work to going forward. Therefore the text in policy **SL2** should be altered to state that each site in the policy should be accompanied by an agreed masterplan for each specific site. The developer supported the allocation and the extension of the settlement boundary as proposed; and confirmed that the site is available, suitable and achievable, i.e. is deliverable and could come forward now with first completions in 2017. The site is identified for 442 homes in the policy, but the developer considers the site could accommodate up to 450 homes. The developer proposed that site **HSS5** is revised to state 450 homes. The site could deliver from 2017/18 onwards and there are no technical issues which require the development to start later in the plan period. For policy **SL2**, the table should now state: site **HSS5** - Cropper Road West, Whitehills 450 23.1Ha 2017/18 and clarify that a masterplan is for site **HSS5** only.

A developer was concerned with the reliance placed on 10 sites to deliver 80% of the housing requirement for the Borough, particularly the significant reliance placed on sites in Lytham St. Annes and the Fylde-Blackpool Periphery. The developer considered the allocation for the Fylde-Blackpool Periphery Locations to be too high from a market saturation perspective, and not a location where people wish to live. For example sites in Kirkham and Wesham are currently delivering at a much quicker rate than those in the other three Strategic Locations. Site **HSS4** – Coastal Dunes, Clifton Drive North, is situated to the west of Blackpool Airport in the Blackpool Airport Corridor and was previously used as a holiday park. The site has planning permission for 348 homes. The developer is aware that construction has commenced on site and the development is being actively marketed by Persimmon Homes. The developer accepts that there is no evidence why this site will not be deliverable within the plan period. Site **MUS1** – Cropper Road East, Whitehills is a mixed use development site. Development of 146 homes has commenced on part of this site and is expected to be completed by 2022. There are two other outline applications on the site for a mix of employment and residential use, for 200 and 26 homes respectively. The delivery of the site is dependent on improvements to local infrastructure; however, the scale of development in this location is considered to be achievable over the plan period. Site **MUS2** – Whyndyke Farm, Preston New Road (A583), Whitehills is a mixed use development site and benefits from outline planning permission for 1,310 homes; including the provision of two new local neighbouring centres, a primary school and a health centre, in addition to improvement to Junction 4 of the M55. **Appendix 2** of the Local Plan expects Site **MUS2** to start delivering in 2018, consistently delivering 100-110 homes per annum between 2020 and 2032. Again, the Plan is unclear what assumptions are being applied by the Council relating to their delivery of this site. The developer considered the consistent delivery 100-110 homes per annum on a site of the scale of **MUS2** – Whyndyke Farm to be unrealistic, given the scale of the infrastructure required to facilitate the development, including improvements to Junction 4 of the M55, provision of neighbourhood centres in addition to education and health provision. Furthermore, the scale of this site means that it is likely to be developed by multiple housebuilders. Whilst this would increase the overall output of homes achieved per year in comparison to a smaller sites, the annual delivery rate from these sites must not be overestimated as increased local market competition can serve to dampen delivery rates

typically achieved. The rate of delivery from this site must not therefore be assumed to increase incrementally at a rate which is consistent with sites of one or two developer outlets, but marginally decreased proportionately with each new additional developer to take account of the effects of market saturation. The developer considered it unlikely that the full 1,310 homes will be delivered within this plan period. In order to ensure that the full objectively assessed housing needs of this plan period are met in full there is a need for further sites to be allocated. Site **HSS5** is situated west of Cropper Road, Whitehills and is expected to deliver 442 homes over the plan period, with delivery expected to start in 2020. At present the site would not be suitable for development as access to the site via Cropper Road is limited. Significant highways improvements to Cropper Road would be required to facilitate the development. The Council has failed to provide any evidence that this would be achievable or viable. The site is also currently unavailable and within the ownership of multiple land owners who currently occupy the site. This has the potential to impact upon the lead in time of the site if one landowner is not willing to co-operate. No evidence has been provided that the site will be available for development in the long term. Furthermore, the market competition of other sites coming forward earlier in the plan period within the Fylde-Blackpool Periphery can serve to dampen delivery rates. The developer does not consider that this site is deliverable within the plan period. Site **HSS6** is situated off Lytham St Annes Way, at Whitehills and has planning permission for 150 homes. The developer is aware that development has commenced and accepts that the site will be deliverable within the plan period. There does not appear to be any contingency or policy mechanism in place through which the Council can respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

A developer considered that land on the south side of Whitehill Road Westby, should be allocated for housing in the Local Plan. It is well related to existing development and would be a logical extension to the built up area referred to as the Fylde-Blackpool Periphery Strategic Location for Development. As a small site, the proposed allocation would not be reliant on significant new infrastructure and could come forward in the earlier part of the Plan in advance of the larger allocations which require new infrastructure to be provided.

A resident supported policy **SL2** and seventeen residents supported the proposed housing allocation on site **HSS5** – Cropper Road West, Whitehills in policy **SL2**.

Paragraph 7.30

An Action Group objected claiming that if the four Strategic Locations for Development will have the employment, then it is in those locations where the housing needs to be developed - if that employment comes to fruition. The Action Group questioned where this requirement was when planning application 15/0458 was approved in Wrea Green.

Paragraph 7.31

Lytham St Annes Cycle Group objected claiming that site **HSS4** – Coastal Dunes should incorporate a designated cycle route from Squires Gate railway station to emerge at the farther end of the development and emerge along Clifton Drive North. Ideally, this route

should continue through the Starr Hills nature reserve (alongside the railway fence) to emerge further down Clifton Drive North (or into Kilgrimol Gardens).

A resident commented that this is key and will set the tone as to whether Fylde Council and LCC are serious about cycling, the environment and health and fitness. If this is on the pavement, or a white line then it will cost a huge amount and be ignored and useless. This hugely wide road, with a newly reduced speed limit enables proper, kerbed and separate cycling areas which the Fylde can support and will bring in more cycling and encourage the elderly and children to cycle more.

Paragraph 7.32

*A developer supported the inclusion of site **HSS4** – Coastal Dunes. The site has planning permission for 348 homes, development has commenced on site and the development is being actively marketed. The developer accepted that there was no evidence why the site will not be deliverable within the plan period.*

Paragraph 7.33 and 7.34

*Lytham St Annes Cycle Group commented on the development of both sites **MUS1** and **HSS5** requesting that Cropper Road should be inaccessible to motorised through traffic. Cropper Road is the natural continuation of the proposed cycle path along Wild Lane. Wild Lane is currently traffic calmed and it is important to prevent this road becoming a high speed rat run to / from the M55.*

*An Action Group commented that 7 years to develop 146 homes on site **MUS1** – Cropper Road East was very slow. The Action Group claimed that is why there are so many sites; slow development equals more sites, equals even slower development and this failed to be recognised.*

Paragraph 7.35

*Lytham St Annes Cycle Group requested the provision of a new cycle route from Mythop Road alongside the Borough boundary to connect with the National Cycle Network route 62 at Staining. This would provide a direct cycle access from Whyndyke Farm – site **MUS2** – to the existing Blackpool cycle network.*

Paragraph 7.36

*An Action Group objected to the acceptance of less than 30% affordable provision (or even less than 20% at site **MUS2** - Whyndyke Farm). The Action Group suggested that Fylde Council are being 'held to ransom'.*

Paragraph 7.37

An Action Group questioned why there would be: 'No discharge to the public sewerage system from the site will take place until appropriate surface water mitigation measures

have been implemented, and no surface water from the site shall discharge to the public sewerage system at any time' as set out in paragraph 7.37.

Paragraph 7.38

*Fifteen residents supported the proposed housing allocation on site **HSS5** – Cropper Road West, Whitehills.*

*One resident would like to build a bungalow on Spen Dike Paddock, Bambers Lane, next to Pollanza – Cropper Road West – site **HSS5**.*

Paragraph 7.39

*A developer requested that paragraph 7.39 be amended with a start date for construction on site **HSS5** at Cropper Road West, Whitehills in 2017, rather than 2020.*

*Two residents supported the allocation of land for housing on site **HSS5** at Cropper Road West, Whitehills.*

Paragraph 7.42

Blackpool Council welcomed the recognition of the sub-regional significance of the Fylde-Blackpool Periphery and the importance of its contribution towards diversifying both Fylde's and the wider Fylde Coast's economic base by making provision for high quality and readily available sites.

Paragraph 7.47

LCC has requested additional text on the significant shortfall of primary places over the next five years in the Fylde-Blackpool Periphery Strategic Location for Development.

An Action Group questioned if improvements were taking place to cycle routes into Blackpool and in the vicinity of junction 4 of the M55 and the cycle paths on Lytham and St Annes Way were completed from the A583 to Cropper Road.

A resident commented on improving cycle routes by taking countryside, some pavement and some road space to build proper, segregated cycle ways which are safe and meet requirements.

Council response

The council noted Highways England's support for the changes to the overall distribution of development and the identification of additional sites within the Fylde-Blackpool Periphery Strategic Location for Development. The council agrees with the need for further evidence to enable Highways England to make further comments on these development proposal (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. The council will engage with LCC as the Highways Authority over

the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

The council notes LCC's comments on the need for a new policy on Blackpool Airport Enterprise Zone, which is dealt with in Chapter 9. The council notes LCC's support for the mixed use allocation at Marton Estate within site **MUS1** – Cropper Road East, Whitehills; and the comments regarding the number of homes that could be accommodated on the site.

The council notes Blackpool Council's support for a masterplanning approach for the Fylde-Blackpool Periphery Strategic Location for Development. The council agrees that policy **SL2** needs amending to clarify who will produce a masterplan and the likely timescales. The council agrees that prospective developers should work closely with both Fylde Council and Blackpool Council on the delivery of development within this Strategic Location. The council notes Blackpool Council's request for an additional policy relating to housing on the Blackpool periphery, providing the basis to enable off-site payments for affordable housing for expenditure in Blackpool, where deemed appropriate, which is dealt with in Chapter 10. The provision of infrastructure to accommodate development in the Fylde-Blackpool Periphery Strategic Location for Development, will be dealt with on a masterplanning basis – bearing in mind policies **INF1** and **INF2** in Chapter 12 which deal with Service Accessibility and Infrastructure; and Developer Contributions, respectively. The council notes Blackpool Council's suggestion that site **HSS5** – Cropper Road West be de-allocated. Site **HSS5** is developable and deliverable and should be retained in the Local Plan.

The council notes the comments made by the Lytham St Annes Cycle Group regarding cycleways in the Fylde-Blackpool Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

The council notes a landowner's comment that the majority of employment land allocations are focussed on sites within the Fylde-Blackpool Periphery Strategic Location for Development and that a site at Corner Hall Farm in Kirkham and Wesham should be allocated for development. The council considers that the majority of employment allocations in and around Whitehills are historic ones that have been brought forward from the existing Fylde Borough Local Plan (As Altered), October 2005; and through the planning application for the development of Whyndyke Farm, which includes 20 Ha of employment land. The allocated and committed employment site within the Fylde-Blackpool Periphery are all easily accessible off Junction 4 of the M55. The council does not consider there is any need to allocate additional employment land at Corner Hall Farm, in Kirkham and Wesham. The council considers that employment land at Mill Farm will meet the needs of Kirkham and Wesham.

The council notes the comments made by landowners of Wild Lane and Peel Road, in Whitehills requesting that their land be included in the site allocations for the Fylde-

Blackpool Periphery Strategic Location for Development (see map at back of the Responses Report). The council considers that these sites between Wild Lane and Peel Road are not included in the Local Plan. Too much development in this area could have negative implications on the Borough's settlements. The sites are detached from the built-up area. There are physical barriers to movement such as main roads, motorway slip roads and the M55. The development of these sites would have an adverse impact on an area of open countryside. The sites should not be allocated in the Local Plan.

The council notes Blackpool South Caravan Club's comments about the development of their site for housing and for the re-location of the caravan site (see map at back of the Responses Report). The council considers that the Caravan Club site and the adjacent site are not included in the Local Plan. Too much development in this area could have negative implications on the Borough's settlements. The sites are detached from the built-up area. There are physical barriers to movement such as main roads, motorway slip roads and the M55. The development of these sites would have an adverse impact on an area of open countryside. This sites should not be allocated in the Local Plan.

The council notes a landowner's objection to the projected build-out rates at site **MUS2** - Whyndyke Farm within the Fylde-Blackpool Periphery Strategic Location for Development. The housing target at Whyndyke Farm has been confirmed with the planning consultant dealing with the outline planning application and it is set out in the Housing Trajectory in **Appendix 2**.

The council notes a landowner's objection to the omission of their land at Madhuban, Cropper Road North, Westby from the RPO version of the Local Plan (see map at back of the Responses Report). The site is not large enough to comprise a strategic site, but it could constitute a windfall site, accommodating up to 9 homes.

The council notes a developer's support for the inclusion of site **HSS5** – Cropper Road West, Whitehills and the fact that the developer submitted a layout plan (masterplan) with the representation, which included the indicative location for a local retail centre. The council also agrees with the developer that the site could come forward in 2017/18 rather than the projected start date of 2020 and that it could accommodate up to 450 homes rather than the 442 homes set out in policy **SL2**; and that the wording will be amended accordingly.

The council notes a developer's objection to the quantum of development proposed in the Fylde-Blackpool Periphery Strategic Location for Development, as opposed to the Kirkham and Wesham Strategic Location for Development. The council also notes the developer's questioning of whether site **HSS5** – Cropper Road West, Whitehills and site **MUS2** – Whyndyke Farm will be delivered within the plan period. The council has received confirmations from the landowners at sites **HSS5** and **MUS2** that they will be entirely built-out during the plan period. The Housing Trajectory in **Appendix 2** of the RPO version of the Local Plan indicates that all 1,310 homes on Whyndyke Farm and 442 homes on Cropper Road West will be delivered within the plan period, which ends on 31st March 2032. The council does not consider it necessary to identify additional sites above and beyond those already allocate in the RPO version of the Local Plan. The council notes the developer's request for a contingency or policy mechanism through which the council could respond to

a shortfall in housing, should the Strategic Locations fail to come forward, or deliver fewer homes than estimated. This issue of a contingency to respond to a shortfall is addressed under policy **H1** in Chapter 10.

The council notes that 17 residents supported the proposed housing allocation on site **HSS5** – Cropper Road West, Whitehills; and that a resident supported policy **SL2**.

Paragraph 7.30

The council notes an Action Group's comments regarding focussing development in the four Strategic Locations for Development, rather than in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including at Wrea Green.

Paragraph 7.31, 7.33, 7.34, 7.35 and 7.47

The council notes the comments made by the Lytham St Annes Cycle Group, an Action Group and a resident regarding cycleways in the Fylde-Blackpool Periphery Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Paragraph 7.34

The council notes an objection from an Action Group in Wrea Green objecting to the projected delivery rates of new homes on site **MUS1** – Cropper Road East, Whitehills. The developer of the site has confirmed that the build out rate in paragraph **7.34** and in the Housing Trajectory in **Appendix 2** is correct.

Paragraph 7.36

The council notes an objection from an Action Group in Wrea Green to the acceptance of less than 20% affordable housing at site **MUS2** - Whyndyke Farm. The outline planning application proposes new transport, community and green infrastructure on site, together with the provision of 200 affordable homes, which the council considers to be appropriate for the site.

Paragraph 7.38

The council notes a resident's request to build a bungalow on Spen Dike Paddock, Bamber Lane, next to Pollanza – site **HSS5** - Cropper Road West. The council has informed the resident about the pre-application advice service that the Development Management Team operates if they want to submit a planning application for a bungalow on the site.

Paragraph 7.42

The council notes Blackpool Council's support for the recognition of the sub-regional significance of the Fylde-Blackpool Periphery.

Paragraph 7.47

The council notes and agrees with LCC's request for additional text on the significant shortfall of primary places over the next five years in the Fylde-Blackpool Periphery Strategic Location for Development.

Recommendations for change

- Amend the second sentence in policy **SL2** to read: '~~An agreed masterplans and an approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the wider~~ Fylde-Blackpool Periphery Strategic Location for Development, which includes land along the Blackpool Airport Corridor at Squires Gate which ~~will be~~ are shown on the Policies Map...'
- Amend the number of homes in policy **SL2** for **MUS1** – Cropper Road East, Whitehills to read: ~~372~~ 446; and for **HSS5** – Cropper Road West, Whitehills to read: ~~442~~ 450 and its projected commencement date to 2017/18 ~~2020~~'
- Add the following sentence to the end of paragraph **7.41**: 'It is essential that prospective developers in the Fylde-Blackpool Periphery Strategic Location for Development work closely with both Fylde Council and Blackpool Council to ensure that issues relating to Blackpool and the wider area are fully taken into account.'
- Add a new paragraph after paragraph **7.47** and re-number the subsequent paragraphs: '**7.48** The Fylde-Blackpool Periphery is predicted to have a significant shortfall of primary school places within the next five years. Therefore, further primary school provision will be required if housing demand and / or births continue to increase at the same rate.'
- The council will engage with LCC as the Highways Authority over the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

Additional recommendations for change

The following additional change is proposed to ensure that the wording in the Local Plan is up-to-date and in accordance with the Framework.

Additional textual changes

- Amend the first sentence in policy **SL2** to read: ‘Proposals for development of the following strategic sites identified on the ~~Inset Maps~~ Policies Map ~~at the back of accompanying~~ this plan will be supported as follows:’
- Amend the last sentence of policy **SL2** to read: ‘A ~~phasing plan should be submitted by the applicant, and a~~ programme of implementation should be agreed by between the council and the developer in accordance with the masterplans and the design codes.’
- Amend paragraph **7.39** to read: ‘As there are surface water and wastewater issues at land at Junction 4 of the M55 and road improvements will be required to the junction, ~~development in this area is phased towards the end of the Plan period. Therefore,~~ it is anticipated that development of housing on this site could start in ~~2020~~ 2017, with completion by 2029. Any proposal on this site will need to be accompanied by a comprehensive masterplan to be agreed by the council.’

Policy SL3: Warton Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
9	0	13	22

Representations received from:

- Highways England
- Bryning with Warton Parish Council
- CPRE – Fylde District
- Lytham St Annes Cycle Group
- 1 Developer
- 3 Landowners
- 8 Residents

What you said

Highways England supported the overall distribution of development. Notwithstanding this, it was previously identified that a suitable evidence base was needed in order to consider the implications of new development on the safe and efficient operation of the Strategic Road Network; and that appropriate measures should be identified to support the proposed level of development. Highways England, in September 2015, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) - Highways England Assessment Report' that included the stated level of development in this policy (noting a small difference in relation to the quantum of development at site **HSS7**). It is not clear if any further evidence has been developed, beyond that initial assessment, that would enable Highways England to make further comments on these development proposal (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. It intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions.

Bryning with Warton Parish Council commented that policy **SL3** Warton Strategic Location for development now exceeds 650 homes and 8% as indicated.

CPRE – Fylde District was concerned with the implications and consequences of the identification of Warton as a Strategic Location. The CPRE – Fylde District claimed that this could only give support to further loss of greenfield sites to development despite a large amount of previously developed land becoming surplus to BAE's requirements. CPRE – Fylde District considers there are valid planning grounds for part of the Enterprise Zone land to be reallocated for housing, due to the fact that there appears to be little demand for employment use. It is wrong to say that a key characteristic of Warton is that it 'is part of the main urban area which runs adjacent to the coastline' (paragraph **2.41**). Warton is in fact a village separated from the urban area of Lytham St Annes by land designated as Green Belt. CPRE – Fylde District's concerns have been confirmed in that the ambition of policy **SL3** to provide 'up to 650 homes inclusive of existing plan period commitments' has already been breached by the appeal decision for greenfield land at Blackfield End Farm (Appeal 2217060 24th September 2015). This site is not proposed for allocation in the RPO. CPRE – Fylde District also criticised the lack of 'new' employment land allocation at Warton in **SL3** as represented by the Enterprise Zone. The CPRE – Fylde District considered that policy **SL3** as stated is not sound.

A landowner supported the general thrust of the RPO and the identification of Warton as a strategic location for development. With regards to the housing requirements set out for Warton, these are set out in policy **SL3**. 254 homes are identified, though 650 are required through the plan period with the remaining land allocations to be identified as part of the Neighbourhood development Plan. Non-strategic allocations, such as this, should also be included within the final adopted Local Plan to ensure that the principles of sustainable development and growth across the Borough can be delivered.

A landowner commented now that the Blackfield End Farm development has been approved, the following developments to the north and west of Warton could be combined to provide a

coordinated masterplan across Warton, including improved links and permeability, and an example of this is set out on the Warton Spatial Masterplan. These comprise:

Permitted developments at Blackfield End Farm (up to 360 homes) and Riversleigh Farm (83 homes);

Proposed developments at Clifton House Farm (up to 115 homes) and Oaklands Caravan Park (53 homes); and

Potential future development on the remainder of the site at Clifton House Farm (approximately 165 additional homes, taking total to 280).

*Potential future development at Clifton House Farm would link the current proposals with Blackfield End Farm and would provide the opportunity for a complete link road through from Lytham Road in the south west of Warton to Church Road to the north. When combined with the other commitments to the east and south of Warton, this would take the total level of development across the plan period to approximately 1,110 homes; which is still within the 2013 Preferred Option requirement for Warton, which was considered sustainable in the SA and deliverable in the SHLAA. The landowner considers that the combination of these proposals to the north and west of Warton aligns closely with the requirements of draft policies **SL3** and **M1**, or as closely as practicable given the early stage of the plan, the outline nature of the developments and the limitations of the landowners land interests (to the Blackfield End Farm and Clifton House Farm sites).*

*A landowner commented that it is unclear from policies **M1** and **SL3** who is expected to drive the masterplanning process within Warton, but suggests that the intention is for the developer, the council, and Neighbourhood Plan Steering Group to work together; with the supporting text for policy **M1** also noting that early engagement with landowners and developers is welcomed (paragraph **7.4**). In this instance, the landowner has sought engagement with both the council and Neighbourhood Plan Steering Group at every stage of the process and have sought to provide a detailed masterplanned approach to the land within their ownership and to facilitate and assist with masterplanning across the remainder of the settlement. The landowner began promoting both the Blackfield End Farm and Clifton House Farm sites back in 2013, when there was an aspiration from Fylde Council to allocate both sites for housing, and as such positive representations were made into the Preferred Option Local Plan in August 2013, confirming that both sites were available, suitable and deliverable.*

*A landowner commented that policy **SL3** sets out the strategic allocations and policy approach proposed for the Warton Strategic Location for Development to 2032, based on delivery of 'up to' 650 homes. Firstly, using the phrase 'up to' does not accord with the Framework nor the overall housing requirement in policies **DLF1** and **H1** which clearly state that the 370 dpa requirement is a minimum; and therefore the wording should be updated to state 'at least' or 'a minimum of' x homes. Secondly, it should be noted that the Secretary of State's approval of the Blackfield End Farm appeal means that committed development in Warton since 2011 now stands at 779, and therefore the 650 figure has already been exceeded and should be updated, with Blackfield End Farm included as a strategic allocation and within the housing trajectory at **Appendix 2**. Notwithstanding this, the evidence shows this figure should be increased further, firstly to reflect the total supply figure of between 11,088 and 11,340, and to align with the level of and proportion of development set out in the previous Preferred Option document, as this has reduced significantly since 2013, with*

insufficient justification. The reduction in numbers in Warton from 1,160 to 650 was first recommended by the council within the Responses Report to the 2013 Preferred Options, issued in July 2014. A requirement of 638 homes was also put forward in the draft Warton Neighbourhood Plan which went on consultation through July and August 2014, and this was then rounded up to 650 in the Submission version Neighbourhood Plan which went on consultation in October/ November 2014. These figures were both informed by meetings that the council and Neighbourhood Plan Steering Group had had with ATLAS; the government advisory service for large strategic developments/ urban extensions. However it is the landowners strong view that the 650 figure arrived at has been entirely based on a misunderstanding of a comment made by ATLAS in relation to the developable areas of the Local Plan Preferred Options Allocations shown under policy **SL3**. In advising the NPSG on a number of matters, ATLAS advised that the developable area of the **SL3** allocations was likely to be around 55% of the total area after accounting for green infrastructure, non-developable land and other considerations. Notably, 55% of 1,160 equates to 638 which is the precise figure that was proposed in the Draft Neighbourhood Plan. Indeed, direct reference is made within the Draft Neighbourhood Plan to ATLAS's recommendations and the 55% development figure and how 638 is derived. However, ATLAS confirmed in their response to the Draft Neighbourhood Plan that they were referring to a developable area percentage and not the quantum of homes that should be delivered. As such, the original 638 figure had no robust foundation in terms of addressing an objectively assessed housing need for Warton or the Borough and even less justification is provided for the 650 home figure, which appears to be a simply rounding up of the previous 638 homes. Indeed, no local needs assessment was carried out by the Parish Council. There is no conclusive evidence to indicate that a higher housing growth figure could not be achieved (due to physical constraints for instance). It is clear that that significant additional housing land for as much as 3,150 homes will need to be made available within Fylde by 2032 for them to meet their full housing needs and economic growth aspirations. Much of this additional housing will need to be accommodated within the four Strategic Locations for Development, with particular pressure on Warton, given the Green Belt and drainage constraint in other strategic locations, and the evidence supporting the 2013 Preferred Options document has already confirmed that Warton could accommodate at least 1,160 homes. This represents an uplift of 510 from the 650 currently proposed in the plan, which equates to 16% of the additional 3,150 required. In summary, this section and the supporting plans have demonstrated that a minimum of 510 homes (including up to 280 within the Clifton House Farm site) could be accommodated within Warton as part of a masterplanned approach that meets the requirements and criteria of Policies **M1** and **SL3**, whilst also protecting against the speculative development that has been allowed in Fylde in recent years due to the council's inability to demonstrate a 5 year supply. Therefore, the landowner strongly objected to the allocation of just 650 homes within the Warton Strategic Location for Development, and suggested this be increased to a minimum of 1,160 homes in line with previous evidence. The Sustainability Appraisal from the Preferred Options document has already demonstrated that Warton can support at least 1,160 homes, which would take up approximately 16% of this additional need. However, given the Green Belt, drainage and infrastructure constraints present within other parts of the Borough and the hugely optimistic delivery rates on existing allocations; coupled with the fact that Warton is a sustainable location with an Enterprise Zone and links to the Preston West Distributor Road,

Warton could therefore accommodate an even larger proportion of this increased requirement.

A landowner objected claiming that the Sustainability Appraisal that supported the Neighbourhood Plan did not include an assessment of any alternative options. The landowner had existing detailed objections to this in representations to the Neighbourhood Plan, where the landowner concluded that the following alternative options should have been considered: A Neighbourhood Plan that delivers the level of housing growth in line with the Preferred Options Local Plan (1,160 homes); A Neighbourhood Plan that provides a further increased housing figure based on the findings of the council's SHMA (17% of proposed total would equate to 1,392 homes); and Alternative site allocations. Fylde Council also raised concerns with this approach in their representations to the Neighbourhood Plan; however it is noteworthy that they themselves have not provided a Sustainability Appraisal to support any of the draft plans and committee reports through which this 650 target was agreed (see Section 3 for more details). A Sustainability Appraisal has now (belatedly) been produced to support the current consultation; however this fails to address the impacts of this reduction in numbers, nor does it assess any reasonable alternatives. Pages 12 and 13 of Appendix F of the 2015 Sustainability Appraisal state: 'SA to be reviewed to remove impacts of other sites and review impact of changes to homes required' suggesting that this work has yet to be undertaken, which raises serious questions about the soundness of the current plan. As such, the findings of the earlier Sustainability Appraisal that supported the 2013 Preferred Options consultation are still robust and are not superseded by the current document. In respect of the 1,160 homes proposed for Warton the 2013 SA noted (at page 55): 'Although Warton currently performs the role of a Local Service Centre, utilising the potential for development on previously developed land at BAE Systems, the establishment of the Enterprise Zone, the prospect of improved road access to a new junction 2 of the M55 and the proximity to wastewater treatment facilities, means that this is a sustainable location for new development.' This document also assessed the 1,160 homes target against 16 sustainability criteria in Appendix D (pages 48-69) and did not identify any impacts that could not be adequately mitigated. In addition, the 4 allocations put forward within this document were also considered suitable and deliverable within the 2012 SHLAA. The Blackfield End Farm Secretary of State's decision also makes references to the proposed 650 housing target; and even though these came before the current consultation draft was published (it was based on the Preferred Options Responses Report from July 2014), we have seen no further evidence to contradict the conclusions at paragraphs 129 - 131 of the Inspectors report, which states: 'It is recommended that the number of homes put forward at Warton under policy **SL3** should be reduced from 1,160 to 650, however there is no reference to a change in the role of Warton as a strategic location for development. Indeed the report explains that unlike other strategic development locations, Warton is not tightly constrained by Green Belt, flooding, infrastructure constraints or environmental designations, and that housing allocations are intended to complement the jobs to be created in the Enterprise Zone (para 129)'... 'At this stage the housing figures in the ELP, both for the Borough as a whole and for Warton, carry only limited weight (paragraph 130)'... 'Insofar as Warton is concerned, there is no clear explanation in the Responses Report to justify the reduction in housing numbers indicated therein (para 131).' In conclusion, there is no evidence to suggest that Warton could not accommodate at least the 1,160 homes proposed within the previous Preferred Option version of the Local Plan.

A developer did not contest the deliverability of Site **HSS7** – Highgate Park, Lytham Road, Warton within the plan period. The site consists of the Former GEC Marconi Factory and adjacent land off Lytham Road in Warton, which has planning permission for 254 homes. Development commenced on site in 2014, with first completions in 2014/15. However, the developer objected to the lack of any contingency or policy mechanism in place through which the council can respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

A developer objected claiming that policy **SL3** refers to sites (plural) where ‘proposals for development.....will be supported’, but names only one site, an existing commitment where the proposals for development have already been accepted. Furthermore the plan states ‘the local plan assigns land for the provision of up to 650 homes...’, but fails to do so on the Policies Map or in any relevant policy of the plan. Thus the strategy for Warton and the policy itself is unsound. The policy seeks, in effect, to abdicate the selection of the Strategic Locations for Development, a central basis of the whole plan, to the emerging neighbourhood local plan, but states that the development area will be ‘shown on the Policies Map’. The policy as a consequence seeks to set out requirements and objectives for a Strategic Development site yet to be identified in another planning document, see paragraphs **7.51** for local service centre provision, **7.52** for wastewater improvements, **7.53** for highways contributions, **7.54** for primary school provision, and **7.55** for cycleway improvements. These cannot be assessed and found to be legitimate requirements without the plan setting out the intended development proposals for Warton. This is most unsatisfactory and will lead to a state of confusion and is not in conformity with the guidance regarding plan making, for either local or neighbourhood plans, set out in Framework or PPG. As such, the approach taken in the draft Local Plan is fundamentally wrong and is unsound. The Strategic Location for Development needs to be identified via this plan process.

A resident requested that the council reconsider **site ref. 71**, Land off Bank Lane, Warton to be included in the Local Plan. It has not been considered as it is classed as Green Belt. Only part of the land is Green Belt, and the land not in the Green Belt could be used for either residential or commercial uses, such as a nursing home. If this land is not included it will leave it isolated as BAE systems has a car park surrounding three edges of this land. The land that is in the Green Belt could be proposed for leisure use such as a caravan site or lodges as it is too small an area to be used productively as a working farm. Part of the Green Belt land was passed for a hard standing about 20 years ago and this was constructed.

Two residents objected claiming that all comments made against the Preferred Option version of the Local Plan in 2013 were a waste of time and effort when it was issued, without any prior consultation with the residents of Warton to inform us of what Fylde Council was intending to do to this area, resulted in the village being subjected to a deluge of planning applications from developers, who saw the issuing of the Preferred Option version of the draft Plan as giving the green light to begin major development in and around the village. Consequently this latest attempt to plan for future development in the Fylde is already out of date where it concerns Warton and experience from the previous draft Fylde Local Plan to 2030 has shown that there is little point in providing extensive detailed comments because:

the RPO version of the Plan to 2032 is already out of date as a result of the Secretary of State's decision to approve the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674), against the objectives of local residents, Fylde Council and LCC. Any comments that are made against the new draft will not stop the tide of planning applications for new major housing developments in and around Warton that residents are still facing on an almost monthly basis. The Government wants developers to build as many homes as possible, and so in the end the developers will just build what they want where want, because ultimately the Secretary of State will approve their application, no matter what we want. All the effort that Warton villagers put into their Neighbourhood Plan has also been a waste of time because Fylde Council has still not progressed the formal adoption of the Plan and so it will continue to be afforded very little weight, as stated by the Planning Inspector and Secretary of State when they recommended approval of the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674). The Neighbourhood Plan is now pointless, worthless and a waste of time and money.

A resident commented that the plan appears to be comprehensive and in some respects has taken account of the widespread opposition to the Preferred Option version; whilst still opposing the large scale of developments planned for Warton, the new and lesser target of 650 homes is welcomed. It is hoped this will endure but there is a fear that the government are only interested in building homes in ever greater numbers, irrespective of local opinion; the acknowledgement of the role of Neighbourhood Plans is welcomed, but there is disappointment that they do not have sufficient weight to directly challenge or stop developers; there is disappointment that the appeal for Blackfield Farm has been allowed - against the wishes of the Neighbourhood Planning team and others. This decision appears to drive a coach and horses through the Local Plan and therefore it is wondered what is the value of the whole exercise.

*A resident objected to development in the Warton area (specifically to development in site **H8** in the Preferred Option version of the Local Plan) and was surprised and disappointed that this had not been anticipated years ago, in time for the construction of a bypass around Warton.*

Paragraph 7.48

Two residents objected claiming that there is little point in providing extensive detailed comments because the new Plan to 2032 is already out of date as a result of the Secretary of State's decision to approve the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674), against the objections of local residents, Fylde Council and LCC. Any comments that are made against the new draft will not stop the tide of planning applications for new major housing developments in and around Warton that residents are still facing on an almost monthly basis. The Government wants developers to build as many homes as possible, and so in the end the developers will just build what they want where want, because ultimately the Secretary of State will approve their application, no matter what we want. The residents claim that all the effort that Warton villagers put into their Neighbourhood Development Plan has also been a waste of time because Fylde Council has still not progressed the formal adoption of the Plan and so it

will continue to be afforded very little weight, as stated by the Planning Inspector and Secretary of State when they recommended approval of the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674). The Neighbourhood Development Plan is now pointless, worthless and a waste of time and money.

*A resident objected to the lack of information in the supporting text to policy **SL3** on infrastructure and amenities for Warton in the Local Plan. The post office is in the corner of McColls mini market in Warton. There is no news on how Freckleton medical centre is going to manage with an additional 650 families. The waiting time at the medical centre at the moment is 4 weeks. What is it going to be in the future?*

Paragraph 7.51

*Bryning with Warton Parish Council commented on paragraph **7.51** 'but there is currently a lack of shops and community facilities'. Which is no doubt why the Plan makes the numerous references to proposed improvements, 'As a focus for new development within the development Strategy, the provision of retail facilities and services appropriate to its scale and function will improve Warton as a sustainable location to live'. - The Bryning with Warton Neighbourhood Plan Steering group through the Parish Council is working closely in partnership with the Borough Council toward a Centre regeneration scheme and inclusion in the 'Local Plan' would present a more tangible way of demonstrating the desire to achieve this as an objective and evidence representation of working together with the local residents in moving such proposed improved facilities forward.*

*A landowner commented in respect of developing a new Local (retail) Centre, it is worth noting that the submission Neighbourhood Plan seeks to focus new retail/commercial development on the Village Centre under policy BWLC1, and has drawn a very narrow boundary around the existing centre in **Figure 9** (see below) which leaves very limited room for expansion. As such if there is a genuine aspiration to create an enhanced Local Centre then this boundary will need to be widened, particularly if the new centre is to support the level of housing and employment growth (1,160+ homes and the Enterprise Zone) that is likely to be required by 2032.*

Paragraph 7.52

*Bryning with Warton Parish Council commented that it is likely that wastewater infrastructure in the Warton area will need to be upgraded in order to deliver additional sites to Highgate Park (site **HSS7**) i.e. those identified in the Neighbourhood Plan'. Representations based on local knowledge and experience in Warton has raised sewerage and surface water drainage concerns on every significant development application since preceding the work on this Local Plan. Failure to address these concerns will have significant long term implications in consideration of existing problems and those anticipated by climate change. The proactive response by the Borough Council toward these issues, outlined in the Plan, are congratulated but it is somewhat concerning that it is contradicted by the wording of such policy **CL2** 'by the need for compelling and detailed evidence demonstrates'.*

Paragraph 7.53

*A landowner commented that in respect to paragraph 7.53 additional development can also provide funding for public realm improvements within Warton Village Centre through off-site contributions in accordance with draft policies **EC5** and **INF2**, which will otherwise go unfunded if the current housing target is maintained, as no further development will come forward.*

Paragraph 7.55

Lytham St Annes Cycle Group commented that the proposed coastal path (around Warton village) should be designated for shared use. This would provide an off-road cycle option which avoids the necessity to ride through Warton along the A584. The A584 cycle path should be extended into Warton.

A resident commented that the coastal cycle route is an ambition, along the outer coastal path. Before this takes place, a higher priority is basic changes to roads along that route to get people to cycle. Some people will come to use a coastal path on the days of good weather and no wind in the Fylde. But people will use proper road paths to cycle to work and school. Time must not be wasted on routes which are idealistic but not practical.

Council response

The council notes Highways England's support for the changes to the overall distribution of development and the identification of commitments within the Warton Strategic Location for Development. The council agrees with the need for further evidence to enable Highways England to make further comments on these development proposal (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. The council will engage with LCC as the Highways Authority over the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

The council notes Bryning with Warton Parish Council's comment that policy **SL3** now exceeds 650 homes and that the policy needs to be amended following the appeal decision allowing homes at Blackfield End Farm.

The council notes CPRE – Fylde District's comments regarding the need to allocate homes within the Enterprise Zone at BAE Systems, Warton, and CPRE – Fylde District's claims that 'there appears to be little demand for employment use' on the EZ land. The council considers there is sufficient land allocated in the four Strategic Locations for Development, without the need to provide additional housing land. The Enterprise Zone at BAE Systems, Warton is a national land designation and it is not factored into the council's employment land provision. However, the EZ is designated solely for advanced engineering and manufacturing as set out in the Local Development Order and not for the provision of new homes.

The council notes a landowner's support for the general thrust of the Local Plan and the identification of Warton as a Strategic Location for Development. The council agrees with two landowners and a developer that policy **SL3** needs amending to include all existing commitments including Blackfield End Farm.

The council notes a landowner's comments about the need to clarify in the text of policy **SL3**, who is expected to drive the masterplanning process within Warton. The council agrees with the landowner that the intention is for the council, the Neighbourhood Plan Steering Group and the developers to work closely together.

The council notes a developer's objection to the allocation of 650 homes in the Warton Strategic Location for Development and that this should be increased to a minimum of 1,160 homes. The council acknowledges the landowner's claim that the Sustainability Appraisal from the Preferred Option version of the Local Plan demonstrated that Warton could support at least 1,160 homes. The council agrees to amend policy **SL3** by including all of the existing commitments in Warton, which will result in a higher figure for homes than the figure of 650 which currently appears in policy **SL3**. The council notes the developer's objection that the Sustainability Appraisal which accompanies the RPO version of the Local Plan does not assess any reasonable alternatives and that this work had yet to be undertaken. The developer's objection to the current Sustainability Appraisal is addressed in the SA section at the back of this Responses Report.

The council notes a developer not contesting the deliverability of site **HSS7** – Highgate Park, Lytham Road, Warton within the plan period. However, the council disagrees with the developer's request for a contingency or policy mechanism through which the council could respond to a shortfall in housing, should the Strategic Locations fail to come forward, or deliver fewer homes than estimated. This issue of a contingency to respond to a shortfall is addressed in more detail under policy **H1** in Chapter 10.

The council notes a resident's request that **site ref. 71** (Sites Assessments Background Paper) – Land off Bank Lane, Warton be re-considered and be included in the Local Plan as a housing allocation. The council disagrees with the resident's request that this site be included in the Local Plan as it is located in the Green Belt.

The council notes a resident's support for the Local Plan, including the figure of 650 homes in Warton over the plan period, and the acknowledgement of the role of Neighbourhood Development Plans. The council notes the resident's disappointment that the appeal for Blackfield End Farm has been allowed.

The council notes a resident's objection to development in the Warton area and the disappointment that this had not been anticipated years ago, in time for the construction of a bypass around Warton. The infrastructure requirements – including transport for Warton and Fylde in general - are set out in the draft Infrastructure Delivery Plan, which accompanied the RPO version of the Local Plan.

The council notes the objections raised by two residents of Warton that the previous Local Plan (Part 1) Preferred Option document, issued in summer 2013 resulted in the submission

of a number of planning applications for residential development. The council cannot prevent developers, landowners or members of the public submitting planning applications for determination, regardless of the stage at which the Local Plan has reached. In November 2014, the council resolved to prepare a single Local Plan, which would combine the Part 1 – strategic policies with the Part 2 element, comprising non-strategic sites, retail and employment boundary reviews and policies on leisure, culture and tourism development. The RPO document comprises the draft single plan for Fylde. The inspector's decision on the Blackfield End Farm Inquiry will need to be taken on board and the additional housing numbers, amounting to 360 new homes, will be added to the overall commitments figure in the next iteration of the Local Plan – the Publication version, which will be issued in summer 2016. The residents' claim that the council has still not progressed to the formal adoption of the Bryning with Warton Neighbourhood Development Plan is not accepted by the council. Fylde Council submitted formal comments to the pre-submission stage on 13th August 2014 and a meeting was held to discuss Fylde Council's comments with the Parish Council on 18th August 2014. Consequently, the Submission version of the Neighbourhood Plan was received by Fylde Council. During the six week consultation into the Neighbourhood Plan, 53 representations were submitted – 31 in support, 14 comments and 8 objections. Fylde Council set up a small member working group to meet the Parish Council to discuss concerns and attempt to overcome the objections received during the six week consultation. In December 2015 a number of meetings were held with the Parish Council regarding how to take the Neighbourhood Plan forward after the appeal decision on Blackfield End Farm. The Parish Council wish to proceed with the current version of the Neighbourhood Development Plan.

Paragraphs 7.48, 7.51 and 7.53

The council notes a resident's objection to the lack of information on infrastructure and amenities for Warton in the Local Plan. The infrastructure requirements are set out in the draft Infrastructure Delivery Plan, which accompanied the RPO version of the Local Plan.

Paragraph 7.51

The council agrees with Bryning with Warton Parish Council that the inclusion of a local retail centre including shops and community facilities would present a tangible way of demonstrating the desire to achieve this as an objective, working with the local residents in progressing the delivery of improved facilities.

The council notes a landowner's comment that the new local retail centre will need to be illustrated on a wider footprint than the very narrow boundary that has been drawn around the existing centre in Figure 9 under policy BWLC1 in the submission version of the Bryning with Warton Neighbourhood Development Plan. The council agrees to identify an area of land in Warton for a new local retail centre on the Policies Map, which will accompany the Publication version of the Local Plan.

Paragraph 7.52

The council notes Bryning with Warton Parish Council's comment regarding the need to upgrade wastewater infrastructure in the Warton area to enable the delivery of additional sites identified in the Neighbourhood Development Plan. The council will contact United Utilities to resolve issues regarding the delivery of sufficient wastewater infrastructure to accommodate development in some areas of Warton identified in the RPO version of the Local Plan.

Paragraph 7.53

The council notes a landowner's comment that additional development could also provide funding for public realm improvements within Warton village centre through off-site developer contributions. Comments and representations received regarding developer contributions are dealt with under policy **INF2** in Chapter 12.

Paragraph 7.55

The council notes the comments made by the Lytham St Annes Cycle Group and a resident regarding cycleways in Warton Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- Amend the second sentence in policy **SL3** to read: '~~An agreed masterplans and an approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the Warton Strategic Location for Development, which will be is shown on the Policies Map ...~~'
- Amend policy **SL3** to include all existing commitments in the Warton Strategic Location for Development.
- Add the following sites to policy **SL3**: '**HSS12** – Riversleigh Farm, Warton - 82 homes; **HSS13** – Nine Acres Nursery, Harbour Lane Phase 1 – 66 homes; **HSS14** – George's Garage, Warton – 16 homes'
- An area of land for a new local retail centre in Warton will be identified on the **Policies Map**.
- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate development in some areas of Warton identified in the RPO version of the Local Plan.

Additional recommendations for change

The following additional changes are proposed to update the text, to ensure that all recent planning decisions are taken on board at specific sites listed in the text in Chapter 7, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the first sentence in policy **SL3** to read: 'Proposals for development of the following strategic and non-strategic sites identified on the ~~Inset Maps~~ Policies Map ~~at the back of~~ accompanying this plan will be supported as follows:'
- Delete the following text from policy **SL3**: ~~'The Council will work with the Bryning with Warton Neighbourhood Planning Steering Group on a masterplanning exercise as part of the Neighbourhood Plan for Warton, to identify land for the provision of up to 650 homes (inclusive of existing plan period commitments).'~~
- Add the following text to policy **SL3**: 'HSS11 – Blackfield End Farm, Warton – 360 homes to be completed during Plan period'
- Amend the penultimate sentence of policy **SL3** to include: '... and community facilities including a new local retail centre.'
- Amend the last sentence of policy **SL3** to read: 'A ~~phasing plan should be submitted by the applicant; and a~~ programme of implementation should be agreed by between the council and the developer in accordance with the masterplans and the design codes.'
- Amend paragraph **7.48** to read: 'This ~~Revised Preferred Option~~ Publication version of the Local Plan identifies commitments for the provision of up to ~~650~~ 778 homes in Warton over the plan period.'
- Add the following new sub-heading and paragraph after the text relating to Highgate Park, Lytham Road, Warton: 'Blackfield End Farm, Warton (site HSS11) - Outline planning application (13/0674) for erection of up to 360 homes following the demolition of existing buildings (with all matters reserved), on land opposite Blackfield End Farm, was allowed on 24th September 2015.'

Policy SL4: Kirkham and Wesham Strategic Location for Development

Number of representations:			
Comment	Support	Object	Total
8	5	9	22

Representations received from:

- Highways England
- Lancashire County Council
- Lytham St Annes Cycle Group
- 2 Landowners
- 2 Developers
- 8 Residents

What you said

*Highways England supported the overall distribution of development. Notwithstanding this, it was previously identified that a suitable evidence base was needed in order to consider the implications of new development on the safe and efficient operation of the Strategic Road Network; and that appropriate measures should be identified to support the proposed level of development. Highways England, in September 2015, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report' that included the stated level of development in this policy (noting a small difference in relation to the quantum of development at site **HSS10**). It is not clear if any further evidence has been developed, beyond that initial assessment, that would enable Highways England to make further comments on these development proposal (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. It intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions.*

*A landowner objected to the omission of the site known as Pitfield, Fleetwood Road, Wesham (site **H16** in the Preferred Option version of the Local Plan) from the RPO version of the Local Plan. The land adjacent is under-going major development and has altered the nature of this site, which is now out of character in relation to new buildings. The adjacent development is successful in terms of build and sales. Underlying the fact that this area is attractive to future potential developers and house buyers, therefore not creating a white elephant or having a negative impact on the local economy. The land is fit to build on with no risk compared to other identified sites. Infrastructure is already in place. A housing development at this site would also help support the economic growth in terms of trade and employment through the commercial site opposite the land. Local residents will be able to access the Fylde FC leisure facilities. Transport to work is a major target. High frequency bus routes are available from this site and Kirkham train station will continue to provide alternative methods of work and reduce the amount of traffic on the roads. The Pitfield site is sustainable. The site does not fall with a conservation area and not at risk from flooding. Overall, it just makes sense in a practical part to build on this site and have as an option in*

the Local Plan. This development of this site would be clearly justified, effective, and consistent with national policy.

A landowner objected to the emerging Local Plan seeking to identify the vast majority of new employment allocations (47.4 hectares – 85% of the 56.3 Ha total) within the Fylde-Blackpool Periphery Strategic Location for Development (policy **SL2**). There is a clear and unacceptable concentration of employment land in a small area in the Fylde-Blackpool Periphery. The total employment land provision for Kirkham and Wesham is 1.1 hectares (Mill Farm). Even assuming this requirement is met, a more reasonable apportionment of employment land provision would suggest that for Kirkham and Wesham (with 15% of the Borough's population) allocations of around 8-10 hectares would be appropriate. The site at Corner Hall Farm is extremely well placed to meet this need.

A developer did not contest that sites **HSS8**, **HSS9** and **HSS10** will be delivered within the plan period, but objected that there did not appear to be any contingency or policy mechanism in place through which the council could respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

A developer supported the identification of Kirkham and Wesham as one of the four Strategic Locations. The developer requests that the figures in **Table 2** be expressed in a more flexible or 'rounded' way to ensure that the total figures reflect the need to achieve a minimum housing target; and policy **SL4** be reworded so that the figure is expressed as 'in the order of 1,200' rather than '1,142'. The developer supported the allocation of site **HSS9** - Land to the North of Blackpool Road in Kirkham. The developer requested that the reference in policy **SL4** to allocation **HSS9** refers to a total number of homes being 'in the order of 600' rather than the currently drafted precise number of 588. This revision would allow for greater flexibility in the delivery of the strategic housing development, whilst providing the council with sufficient control over the final total number of homes. The current figure is too prescriptive and does not allow for changes in proposed masterplans or layouts which may result from detailed technical work undertaken by future applicants.

A developer submitted a representation in support of the allocation of land at Dowbridge for new homes, as part of the Kirkham and Wesham Strategic Location for Development. The site measures 4.9 Ha and comprises a home with hardstanding and outbuildings, a pig farm and ancillary farm shop, parking area, fields used for grazing, a derelict barn and an access lane. It is largely greenfield land with some areas of previously developed land. The site is adjacent to an established residential community and is approximately 1km from Kirkham town centre. An outline planning application (Ref. 15/0547) has been submitted for the erection of 170 homes on the site. Ecology, Archaeology and Highway matters are currently being considered by the applicant and Fylde Council. An outline planning application (Ref. 15/0827) for the erection of up to 95 homes on the southern part of the site is also pending. The submitted Flood Risk Assessment demonstrates that the residential development will be located solely with Flood Zone 1 and so is not at risk from flooding. The Flood Risk Assessment also confirms that the proposals will not increase the risk of flooding elsewhere. The proposals will also provide SuDs features to manage some of the surface water run-off.

A resident claimed that at present, all the approved building in the Fylde, only managed to produce 200+ homes this year. At the inquiry into the development at Little Tarnbrook Farm, which was subsequently allowed by the inspector, the two building firms (Gladman Housing and Bloor Homes) under questioning from the inspector assured her that they intended to, and had the capability to, build homes themselves according to the plan submitted, and were not intending to sell on the planning permission to anyone else. Subsequently they sold on the rights to two other housing developers. The reasons given by them at the inquiry to justify their application was the failure to meet the then existing annual government targets by the council - particularly social housing. Since, then another housing developer has applied to extend to the next field to build another 250 homes. By delaying the building of the approved housing, this means that the same reasoning can be used again in the future to secure more land for building, and destroy more Green Belt land, before they have produced the housing that they have permission for. The resident suggested that the council consider that the annual number of homes on the Local Plan be reduced to 300, in light of the inability of the existing developers to produce more per year and the council makes it clear to existing developers that they will not consider, and will object, to any applications for future developments by them, until they have completed 50% of their total existing developments, and that this must include 50% of the social housing proposed on the application.

A resident supports the draft Local Plan and the removal of the Land north of Dowbridge from the RPO version of the Local Plan. However, the delay in producing a plan has led to an application for large scale development on this site. The ongoing and planned development(s) in Kirkham will put increasing strain on local infrastructure and services. Are there any additional resources planned to cope with the increased demand?

A resident supported the Local Plan and requested that a flood risk assessment be undertaken at the earliest opportunity for those properties in the vicinity of Dow Brook already potentially affected by the threat of flooding.

*A resident broadly supported the Local Plan, especially the removal of the site north of Dowbridge (site **H7** in the Preferred Option version). The number of proposed homes at 'Kirkham triangle' has been increased to compensate for the loss. The Kirkham area is already making a substantial contribution towards meeting Fylde's housing target.*

*A resident objected to **site ref. 75** – referred to in the Sites Assessments Background Paper, October 2015 - being developed for housing, as it would spoil the views from their property and potentially reduce the value substantially. There would be additional traffic on the A583 and onto New Hey Lane, which would affect the neighbouring livery yard, a cattery and kennels.*

Paragraphs 7.60 and 7.61

*A landowner objected to the omission of Kirkham Grammar School Playing Fields from site **HSS9** (Land North of Blackpool Road, Kirkham. The Grammar School does still wish the playing fields site to be considered for development. It is assumed that the omission of the*

site from allocation site **HSS9** (land north of Blackpool Road) has been an error on behalf of the council and certainly does not reflect any changed position from the landowner.

Paragraph 7.72

Lytham St Annes Cycle Group commented that the proposed enhancement of Kirkham and Wesham railway station should incorporate improved access for cyclists.

A resident commented that people will not cycle unless the paths are designed with kerbs and barriers. Shared environments do not work, white lines do not work. These paths will not deliver any solutions to congestion unless designed properly. These cannot just be a sop to developers or to pretend they will make a difference if the council knows bad design will not achieve anything.

A resident objected as the proposals concentrate on housing and employment, but necessary improvements to the existing infrastructure do not appear to be included. For example, you are proposing 1,142 new homes for Kirkham and Wesham, which in reality is an increase of 1,142 families. In the main the homes are 3, 4 or 5-bedroom luxury homes to be built on the outskirts of the two towns. The location of these properties is likely to lead to multi-car ownership out of necessity. There is already high congestion on the A585 between the roundabout with Blackpool Road (A583) and the M55 particularly at peak times. The proposed pedestrian crossing close to the Blackpool Road roundabout is an accident waiting to happen - whilst I appreciate that it is not the responsibility of the Fylde Council's Planning Department to site these crossings, however, it is being sited there as a direct result of your planning decision to build 588 homes to the North of Blackpool Road. There appears no appetite for developers to build the social housing and affordable housing that is expected by the planning approvals, this needs to be addressed. Perhaps one way would be to insist that after 50% of the development has been constructed, the social and affordable housing should be completed before the remainder of the development is allowed to continue. The proposals for an increase of 1,142 families will include children, we have been led to believe that there are no junior school places in the area and no room to increase the size of the schools, yet your proposals do not include for building an additional school as a condition of receiving planning approval for large housing developments. Car parking in the towns is barely adequate without the inevitable increase in traffic from the new families. Has anyone checked that doctors / dentists they can cope with the increase of 1,142 families?

Paragraph 7.73

A resident commented that the cycle paths will not be used if not fit for purpose, and safe, secure, dry cycle storage must be provided.

Paragraph 7.74

LCC requested that paragraph **7.74** should be amended as a shortfall of primary school places is already identified in Kirkham.

A resident commented that the proposals for an increase of 1,142 families will include children, but residents have been led to believe there are no junior school places in the area and no room to increase the size of the schools, yet the proposals do not include for building an additional school as a condition of receiving planning approval for large housing developments.

Council response

The council notes Highways England's support for the changes to the overall distribution of development and the identification of additional sites within the Kirkham and Wesham Strategic Location for Development. The council agrees with the need for further evidence to enable Highways England to make additional comments on these development proposals (and the Plan as a whole) and its influences on the safe and efficient operation of the Strategic Road Network. The council will engage with LCC as the Highways Authority over the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

The council notes a landowner's objection to the omission of the site known as Pitfield, Fleetwood Road, Wesham (site **H16** in the Preferred Option version of the Local Plan) (see map at back of the Responses Report). The council considers that this site should not be included in the Local Plan. Taking account of the buffer that would be required to protect the adjacent Biological Heritage Site, the site would not be considered 'strategic' in the context of the Local Plan. Too much development in this area would have negative impacts, development should be well distributed throughout the Borough in line with the sustainability appraisal of the Issues and Options and Preferred Option.

The council notes a landowner's comment that the majority of employment land allocations are focussed on sites within the Fylde-Blackpool Periphery Strategic Location for Development and that a site at Corner Hall Farm in Kirkham and Wesham should be allocated for development. The council considers that the majority of employment allocations in and around Whitehills are historic ones that have been brought forward from the existing Fylde Borough Local Plan (As Altered), October 2005; and through the planning application for the development of Whyndyke Farm, which includes 20 Ha of employment land. The allocated and committed employment site within the Fylde-Blackpool Periphery are all easily accessible off Junction 4 of the M55. The council does not consider there is any need to allocate additional employment land at Corner Hall Farm, in Kirkham and Wesham. The council considers that Mill Farm provides sufficient employment land for the Kirkham and Wesham Strategic Location for Development.

The council disagrees with a developer's request for a contingency or policy mechanism through which the council could respond to a shortfall in housing, should the Strategic Locations fail to come forward, or deliver fewer homes than estimated. This issue of a contingency to respond to a shortfall is addressed in more detail under policy **H1** in Chapter 10.

The council notes a developer's support for the identification of Kirkham and Wesham as one of the four Strategic Locations for Development, and the allocation of site **HSS9** – Land North of Blackpool Road, Kirkham. The council does not consider there is a need to increase the number of homes at site **HSS9** in policy **SL4** from 588 to 600. The precise number of 588 homes is considered to be acceptable.

The council notes a developer's submission in support of the allocation of land at Dowbridge for new homes. This site is not included in the Local Plan due to flood risk.

The council notes two residents support for the removal of the land north of Dowbridge.

The council notes a resident's comments about the increasing strain on local infrastructure and services; and the resident's question whether any additional resources are planned to cope with the increased demand. The infrastructure requirements and planned improvements are set out in the draft Infrastructure Delivery Plan, which accompanied the RPO version of the Local Plan.

The council notes a resident's support for the Local Plan and the request that a flood risk assessment be carried out for the properties in the vicinity of Dow Brook, which are already potentially affected by the threat of flooding. The council is considering whether the existing Strategic Flood Risk Assessment needs to be revised.

The council notes a resident's objection to the housing figure and that the annual number of homes in the Local Plan be reduced to 300 homes. Representations on the housing requirement figure are dealt with under policy **H1** in Chapter 10.

The council notes a resident's objection to the inclusion of **site ref. 75** (Sites Assessments Background Paper, October 2015) in the Local Plan for housing. In actual fact, **site ref. 75** - Land North of Blackpool Road, Kirkham (*residential and employment*) is not included in the Local Plan as it is located within a proposed Area of Separation.

Paragraphs 7.60 and 7.61

The council agrees with a landowner that Kirkham Grammar School Playing Fields should be included in site **HSS9** – Land North of Blackpool Road, Kirkham.

Paragraph 7.72

The council notes a resident's objection to the lack of improvements to existing infrastructure to accommodate the level of proposed development in Kirkham and Wesham (i.e. 1,142 new homes), including traffic and transport and access to doctors and dentists. Infrastructure requirements, including transport, health and social care and education are dealt with in the draft Infrastructure Delivery Plan (the IDP), which accompanied the RPO version of the Local Plan.

Paragraphs 7.72 and 7.73

The council notes the comments made by the Lytham St Annes Cycle Group and a resident regarding cycleways in the Kirkham and Wesham Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Paragraph 7.74

The council agrees with LCC's request that paragraph **7.74** should be amended as a shortfall of primary and secondary school places is already identified in Kirkham and Wesham. The council notes a resident's concerns about the lack of junior school places in the area.

Recommendations for change

- Amend the second sentence in policy **SL4** to read: '~~An agreed masterplans and an approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the Kirkham and Wesham Strategic Location for Development, which will be~~ is shown on the Policies Map.'
- The **Policies Map** will include Kirkham Grammar School Playing Fields in site **HSS9** – Land North of Blackpool Road, Kirkham.
- Amend existing paragraph **7.74** of the RPO version to read: '~~There are sufficient primary and secondary school places available in the Kirkham and Wesham area predicted to have a shortfall of primary and secondary places within the next five years. Therefore, further primary school provision will be required if housing demand and / or births continue to increase. area within the next five years. However, a number of schools are close to capacity and, should development come forward in these areas and births continue to increase, the available places will soon be absorbed and new provision will be required.~~'
- The council will engage with LCC as the Highways Authority over the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

Additional recommendations for change

The following additional changes are proposed to amend the text in Chapter 7, to ensure that it is in conformity with the Framework, it is robust and up-to-date.

Additional textual changes

- Amend the first sentence in policy **SL4** to read: 'Proposals for development of the following strategic sites identified on the ~~Inset Maps Policies Map at the back of accompanying~~ this plan will be supported as follows:'
- Amend the last sentence of the second paragraph of policy **SL4** to read: 'A ~~phasing plan should be submitted by the applicant; and a~~ programme of implementation should be agreed ~~by~~ between the council and the developer in accordance with the masterplans and the design codes.'
- Delete criterion ii) in policy **SL4**: '~~Measures, such as a landscape buffer, to avoid indirect impacts on the Biological Heritage Site and designated sites should be incorporated into the design of the site on The Pastures, Fleetwood Road, Wesham (site HSS8)~~'.
- Add a new criterion ii) in policy **SL4**: 'Any proposals for the re-development of Kirkham Grammar School sports pitches on Land north of Blackpool Road, Kirkham (site HSS9) will need to be considered alongside policy HW3 which includes criteria to protect existing outdoor sports facilities'.

Development Sites located outside the Strategic Locations for Development (Paragraphs 7.75 to 7.87 inclusive in the RPO version)

Number of representations:

Comment	Support	Object	Total
16	5	208	229

Representations received from:

- Wyre Council
- Elswick Parish Council
- 10 Landowners
- 1 Developer
- 2 Action Groups

- 106 Residents

What you said

A developer commented that 'Development Sites located outside the Strategic Locations for Development' is not set out clearly as a stand-alone policy and is only identified as explanatory text. This matter should be addressed as its own stand-alone policy to determine clearly how applications for new development will be approached outside of the strategic locations for development.

Paragraph 7.75 - Freckleton

An Action Group objected to just 38 homes being developed in Freckleton, which is a Tier 1: Larger Rural Settlement with many facilities / amenities which the Group claims is not acceptable when other Tier 1: Larger Rural Settlements are having to accept 18 times that volume.

Paragraphs 7.77 and 7.86 - Elswick

Wyre Borough Council commented on development at Elswick which is likely to have an impact on the A585. Development in Wyre is constrained by the capacity of the highways network, most significantly the A585. Wyre Borough Council seeks assurance that development in Elswick will not further constrain development in Wyre. Highways England have been advising Wyre Borough Council on the capacity of the highways network, including the A585, if not already carried out, it is considered that Fylde Council should engage Highways England to ensure that growth at Elswick will not have any significant cross boundary impacts on potential growth in Wyre. Furthermore, as part of infrastructure discussions regarding the emerging Wyre Local Plan, Wyre Borough Council has engaged with Greater Preston Clinical Commissioning Group (CCG), as their CCG area extends into Wyre (and also across parts of Fylde). Discussions with the CCG have covered the capacity of health services across the borough, including at Great Eccleston. Wyre Borough Council encourages Fylde Council to engage with Greater Preston CCG to ensure growth in Elswick, which may impact on Great Eccleston health services, is fully considered with the CCG.

A developer supported the allocation of residential development within Elswick as a sustainable settlement for growth; however, objected to the mechanism of allocation via the Neighbourhood Plan process (paragraph 7.76). The village is yet to be designated as a Neighbourhood Plan area and no progress has been made on drafting the Plan. This leaves many uncertainties over the delivery of housing in Elswick and it is too simplistic to suggest that a future Neighbourhood Plan would address such anomalies. The developer recommended that the council looks to allocate sites as part of the Local Plan process to ensure there is a mechanism to deliver housing in Elswick, should the Neighbourhood Plan not come forward. The developer has an interest in the Land to the north of Mill Lane, which has the potential to deliver up to 100 homes. The developer claims the development of this site would contribute to the creation of a sustainable mixed community through the potential to provide an appropriate mix and type of housing on the site. Development of the site would also help stimulate the local economy by generating additional spending power in

the local community. The developer claimed the site is immediately available for development and there is no land in other ownerships which must be acquired to develop the site; and no restrictive covenants exist. There is a pond located within the site which is proposed to be retained as part of any development proposal. A full Ecology Survey Report will be submitted with any planning application. The site is located within Flood Zone 1 on the Environment Agency's Flood Risk Map and therefore, the site is at a low risk of flooding. Vehicular access can be obtained off Mill Lane. Croft Transport Solutions has provided a drawing indicating the proposed access arrangement as well as 'A Preliminary Vehicular Access Note'. It is proposed to retain the existing hedgerow around the perimeter of the site whilst enhancing the landscaping along the eastern boundary to create a softer edge to the development. The developer claims the development of the site would make a valuable contribution to the Borough's housing land supply and therefore should be allocated as part of the Local Plan. The developer considered that the council must look to allocate additional sites to ensure that if there is a failure to deliver, an ongoing shortfall is avoided. This includes the allocation of sites within the Tier 1: Larger Rural Settlements. The council should not assume that the existing commitments within these rural settlements will meet the objectively assessed needs of the Borough as a whole, nor should sites be left to be allocated at an unspecified point in time through the Neighbourhood Plan process.

Elswick Parish Council objected to the proposed number of homes allocated to Elswick which they claimed was far too high considering the settlement's remoteness and lack of facilities. Elswick has been allocated a similar number of homes as much larger rural settlements such as Staining, Newton and Wrea Green, all of which lie on the edges of urban conurbations and thus enjoy considerably better facilities. The table below illustrates the point.

<u>Village</u>	<u>Current number of homes</u>	<u>Proposed number of homes</u>	<u>% increase</u>
Staining	1,043	141	13.5%
Wrea Green	701	150	21.39%
Newton	689	115	16.69%
Elswick	461	140	30.36%

Elswick was one of the lowest scoring rural settlements on the sustainability exercise due to its remoteness and lack of services. It seems at odds therefore that the village should be allocated a much larger percentage of growth in comparison to other villages. Growth surely should be prioritised in the areas where there are the facilities and infrastructure to cope. Elswick Parish Council believes that to retain the character of the village it should be included with villages of an almost identical size such as Clifton and Singleton where the allocations are much lower (see table below):

<u>Village</u>	<u>Current number of homes</u>	<u>Proposed number of homes</u>	<u>% increase</u>
Clifton	448	50	11.16%
Singleton	459	15	3.26%

An 11.16% increase similar to that at Clifton would provide 54 homes. Applying the overall percentage allocation for the Fylde villages (16.07%) to Elswick would support 74 homes.

Elswick Parish Council considers that these figures are far more realistic, manageable and sustainable. Adopting either of these figures would allow the council to proceed with a neighbourhood plan minimising the impact on the village by developing several small sites rather than huge uncharacteristic housing estates.

Other issues which the Parish Council claims support a reduction in the numbers of house proposed for Elswick include the following: The sustainability study undertaken by Fylde concluded that Elswick is one of the least sustainable villages in the Borough. It has no school, no health centre, only one shop, no post office and it is six miles from the nearest supermarket. Not only is the village remote but it only has an hourly bus service with no buses after 7pm or on Sundays. LCC has announced that it will be withdrawing all bus subsidies in March leaving Elswick with no public transport. The nearest public transport will be in Kirkham or Poulton, 6 miles away. The Health Centre at Great Eccleston (1.5 miles away) has waiting times of 2 to 3 weeks to see a doctor. Attempts to relocate and extend the centre have failed due to lack of finance. No consideration has been given to the cumulative effect on services of developments planned for both Elswick and neighbouring Wyre villages. Over 300 homes are planned in the villages of Little Eccleston, Great Eccleston, Elswick and Inskip. Two cars are a necessity for every household in Elswick. A recent Parish plan survey recorded that there is an average of 1.5 cars per household in the village. Large housing developments are required to have 30% affordable housing. This would not be viable in Elswick with the lack of public transport and the need for households to have more than one car. 140 households would require at least 200 cars and 4 to 5 hundred extra car journeys per day most of which would have to cross or join the A585 at Thistleton junction. This would increase waiting times and exacerbate the serious risks at this already dangerous junction. There is no dial a car or dial a bus scheme in Elswick or surrounding villages. There is little demand for property in Elswick. Homes are simply not selling with several on the market for two years. Only five of the new homes on the new housing estate in the High Street have been sold despite being on sale for over 12 months. There is no industry or employment close to Elswick. Most people are employed in Blackpool 10 miles away.

*Ninety residents, together with a petition with **32** signatories, objected to the allocation of 140 homes at Elswick. Most of the objections mirrored the representation submitted by the Parish Council. However, a summary of objections raised by residents included the following:*

- *A large housing estate surrounding the village would completely destroy the character and appearance of Elswick.*
- *The nearest primary school which is located on Copp Lane is full from having to accommodate children already living within Elswick and each new development results in the number of pupils increasing. There are two small primary schools in Great Eccleston but these will see an increase in numbers when the new housing estate is built around Great Eccleston. The nearest High Schools are located in Kirkham, Poulton-le-Fylde, Garstang, Preesall and Blackpool.*
- *All of the available land for development in Elswick has been or is currently being built on.*
- *There are no employment opportunities in Elswick. The majority of working age residents that live in Elswick travel to Preston, Blackpool, Kirkham, St Annes or beyond*

for work. The major employer, BAE Systems at Warton is in decline with sustained and recurring redundancy programmes.

- The Windy Harbour road widening around the lights has done nothing to alleviate traffic congestion. Bonds Lane and Mill Lane are far too narrow to take any further increase in traffic. The nearest petrol filling stations are in Greenhalgh and Singleton. This means a special journey out of the village, miles away from Elswick. Both of these filling stations are located on busy main roads that cause further traffic chaos.
- The electricity supply and sub-station would need a major up-grade to serve new housing development in Elswick. There is currently a noticeable reduction in the voltage at peak times causing lights to dim and appliances to work less efficiently.
- Despite the installation of fibre optic cable, broadband access is still slow due to demand on the local network.
- The proposed allocation of 140 homes in Elswick would have an effect on wildlife, especially in and around field ponds.
- There would be years of noise, dust, heavy construction traffic and inconvenience whilst the site was being built and an end result of loss of privacy, light, peace and a great strain on local services and infrastructure.
- There are overhead power cables along both sides of Bonds Lane and Mill Lane.
- If Fracking goes ahead, with Cuadrilla submitting applications for 91 seismic monitoring sites, the traffic congestion around the village would be horrendous, even before the development of any new homes. This will also discourage people buying new homes in the area.
- The Parish Council's Neighbourhood Development Plan would not necessarily represent the views of Elswick's residents.
- Development should be focussed on Kirkham. Kirkham has good public transport facilities including main line railway access and reasonable links to Blackpool, Preston and the motorway network. It makes less sense to extend Elswick village than it would to build the proposed 140 homes on any field closer to Junction 3 of the M55. They would be closer to the facilities that Kirkham has to offer and also closer to those of Lytham and St Annes. Inevitable development around the larger settlements can only enhance the sustainability of those settlements. Alternatively, development should be focussed in Blackpool: There are many other more suitable previously developed land development opportunities in Blackpool which desperately requires further investment / affordable housing and which already offers established infrastructure and local amenities. Run down areas should be regenerated where there are already homes which could be renovated, which are near to towns and businesses. Any new housing in Fylde should be provided on previously developed land.

Paragraph 7.78 and 7.86 - **Newton**

A landowner supported the housing allocation on the site at Newton Hall Farm, which would bring additional families into Newton to support the school attendance and provide a greater depth of financial support to both the village school and children's education locally. The site is viable as it is natural infill within Newton; it is located on a bus route, close to the

local store, playing field and school. The development of the site would contribute to meeting Fylde's current housing shortfall.

A landowner submitted information in support of the allocation of additional land off Woodlands Close, Newton as a non-strategic site. The site measures 2.6 Ha and it is located adjacent to the western boundary of Newton, which is a Tier 1: Larger Rural Settlement. The site is within easy walking distance of the local store, the local school, the public house and public transport. The site is identified within the SHLAA 2012 as 'potentially suitable' for development which 'could form a natural extension to (the) existing settlement boundary'. The SHLAA described Newton as a 'desirable rural location'. The landowner considers that the approach in identifying the land as an Area of Separation has not been correctly applied and there are clearly areas within the proposed Area of Separation, such as this site, that are visually restricted by mature vegetation and built development which would mean the site is limited in perception, whether on foot or travelling in a vehicle. Development on the site would not be perceived as significantly closing the gap and there would be no impression given of settlements merging or the sense of leaving one and entering another being diminished. The site was not described as having any specific effect on landscape within the SHLAA and no issue of coalescence between Kirkham and Newton was recognised. The landowner claims that the site is sustainably located and well contained by existing development and natural boundaries. The site is available and deliverable now, could help contribute towards a five year housing land supply in the short term, to support deliverability and flexibility of the Local Plan and therefore, the site should be allocated as a non-strategic location for housing.

A landowner owns the land forming the western part of the proposed housing allocation for 29 homes, identified as Land to the rear of Cobweb Barn, Oak Lane, Newton in the RPO version of the Local Plan. The same landowner also owns the rectangular area of land of approximately 2.1Ha located to the rear of their property and immediately south of the proposed allocation. The landowner requested that the additional area of land be included as an extension to the proposed housing allocation for 29 homes, to form a larger and more beneficial opportunity for sustainable new housing development to take place within Newton. As a Tier 1: Larger Rural Settlement, Newton is a sustainable location for growth and has the physical and social infrastructure to support appropriate additional housing, as well as being an attractive residential area for both working families and retired and older people. There is acknowledged market interest in Newton and the land could be made immediately available so that it offers the potential for development to be delivered in the early Years 5 - 9 of the plan period. It is not clear why the additional area of land was excluded from the proposed allocation as the majority of it is included in the larger site (**site ref. NE06**) identified in the SHLAA in 2012 indicating it is developable. It was consequently not submitted to the Non-Strategic Call for Sites earlier in 2015 and so the current consultation provides the first opportunity for the matter to be brought to the attention of the council and for the anomaly to be rectified by revising the boundary of the proposed housing allocation. The original larger site (**site ref. NE06**) identified in the SHLAA, extended north up to Blackpool Road (A583) and this was scaled back to the line of the double hedgerow marking the northern boundary of the proposed housing allocation, to prevent erosion of the proposed Area of Separation (draft policy **GD3**) between Kirkham and Newton. The Sites Assessments Background Paper (October 2015) confirms that the further

*promotion of the land to the north (identified in the Non-Strategic Call for **Sites Refs. 107 and 111**) has been rejected as it falls within the proposed Area of Separation. The proposed extension lies to the south of the proposed allocation and therefore will not adversely impact on the proposed Area of Separation. The site, comprising a small paddock, a timber stable building and a sand menage (included within SHLAA **site ref. NE06**) is available, suitable and achievable and provides an enhanced opportunity to provide new housing in Newton. The opportunity to secure an enlarged housing allocation would provide a far more certain prospect of delivery than alternatively leaving the land as greenfield land within the proposed extended settlement boundary for Newton (which would follow Parrox Lane and the northern boundary of the proposed housing allocation). An enlarged housing allocation would form a logical rounding-off of development within this part of Newton, enclosed by the road network and existing development. The situation is paralleled by the revision to the boundary of Newton Hall Farm where land nominated via the Call for Sites (**site ref. 94**) is proposed for inclusion in the draft Local Plan together with the farmhouse and buildings, as it forms a natural rounding-off of development along the southern boundary at Newton. The same conclusion must logically be drawn in respect of land on the western boundary of Newton, on a lesser scale.*

An Action Group and 14 residents objected to the allocation of two sites in Newton to accommodate a total of 115 homes. The proposed number of homes on the sites is judged to be excessive. Newton Hall Farm, a Grade II Listed Building, is a working farm. The tenants currently working the farm will need to re-locate to another site to enable them to move forward profitably and to continue to employ local contractors and still offer local teenagers part-time employment.

A number of residents wanted no development at all in Newton, but others claimed they were not against, in principle, accepting new housing on the sites proposed as long as all that could be done to maintain the physical character and heritage of Newton and retain existing features including hedgerows and trees. Any development should ensure the style and type of the new homes adjacent to the current buildings are sympathetic with their style and type. The style and type of homes proposed should be in keeping and include detached homes, bungalows and semi-detached homes sufficiently spaced apart. Notwithstanding this, there is a need to consider incorporating a proportion of homes dedicated as starter homes/low cost housing. Local people, who wish to down-size and stay local, could be given the opportunity to do so if the proposed sites had a range of property sizes. There is no certainty that there will be demand for these new homes as newly built properties in Warton have not sold and seem to have been reduced in price to attract purchasers. Newton needs a more appropriate and suitable play and park areas to encourage youngsters to use them rather than loiter in the streets. More housing will bring more loitering and youth nuisance factors hence the need to have a suitable local open area. The proposed developments at two sites in Newton, potentially amounting to 230 additional cars, would generate traffic congestion and highway safety issues, especially along the primary route – Bryning Lane - in and out of the settlement. The road infrastructure is already overloaded. At peak times traffic already backs up from the traffic lights at Blackpool Road down Bryning Lane. Thames Street is full of potholes, unsuitable for any form of vehicles and it is liable to flooding. Newton Bluecoat Primary School and Treales Primary School are near to capacity. The expansion of the Newton Bluecoat Primary School would further exacerbate the traffic

congestion and parking problems already experienced during school drop-off and pick up times. Any additional pupils would need to travel from Newton to attend schools in Kirkham. The nearest health centres are located in Kirkham and these are over-stretched; and residents have to travel to Lytham or Preston for NHS dental treatment. Significant enhancement to health services must be required as a pre-requisite to any further development. If the two allocated sites were developed it would place additional demand on the ageing surface and foul water infrastructure. There is limited drainage and sewage utilities and it is subject to frequent flooding. The electricity supply to Newton is also unreliable, with numerous occasions over the last ten years when the electricity supply has been cut off.

Paragraph 7.79 - Staining

A landowner commented that planning permission has been granted for 113 homes in Staining. There is also an allocation for 28 homes. This equates to 141 homes to 2032. The allocation for 28 homes is identified on the Staining Inset Plan 22 and the Assessment of Strategic and Non-strategic Sites (October 2015) as **site ref. 138** Land at Thornfield Holiday Camp, in Staining. However, the Assessment of Strategic and Non-strategic Sites concludes that: 'This site is NOT included in the Local Plan. Staining is a Tier 1: Larger Rural Settlement and already has a commitment for 113 homes. There is no need for further allocations at Staining'. The Assessment of Strategic and Non-strategic Sites has conflicting evidence as **site ref. 140** Land at Chain Lane, opposite Community Centre, Staining concludes: 'This site be taken forward as a proposed allocation in the Revised Preferred Option. **site ref. 140** does not appear as a proposed allocation'. It is understood that this is an error and will be corrected at a future stage. This questions the validity and pre judging of the site allocations for Staining and is contrary to the Framework. The starting point for consideration of the emerging Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence. The submissions and especially **site ref. 138** indicate that the council has failed to demonstrate a robust evidence base in preparing its Development Strategy and Site Allocations. The NPPG deals with deliverable sites as follows at Paragraph 031 (Reference ID 3-031-20140306): 'Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up-to-date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.' The Council has provided no information to justify the allocation or confirm consideration of potential alternative sites such as additional housing land at King Close adjoining the consented scheme for (LPA Ref: 13/0590 OL / Appeal decision APP/M2325/A/14/2220410). The

*Strategic Housing Land Availability Assessment (31st March 2012) does not include the majority of the allocated site and the land adjacent to 229 Staining Road (SHLAA **site ref. ST06**) is confirmed as Not Deliverable. This conflicts with the assessment of **site ref. ST08** Land east of Staining which is concluded to be 'Developable'. Consequently it is considered that the allocation for Staining and the Development Strategy does not currently contribute to the achievement of sustainable development contrary to Paragraph 151 of the Framework and Section 39(2) of the Planning and Compulsory Purchase Act and that it will not be found sound upon independent examination.*

*A developer has an interest in land (SHLAA **site ref. ST08** / Call for **site ref. 140**) on the eastern edge of Staining and considers this should be included in the Local Plan as an additional housing allocation. There is strong market interest in Staining and the developer is committed to bringing the site forward and delivering a scheme of approximately 30 homes in the short term in Years 5 - 9 of the plan period. The proposed allocation for 28 homes referred to in paragraph 7.79 and **Table 3** of the draft Local Plan, and shown on proposed Inset Map 22, relates to Thornfield Holiday Camp at Castle Lane, Staining. This is a large, occupied residential mobile home park that will not be available for development in the near future, does not benefit from planning permission for housing redevelopment and cannot be guaranteed to come forward during the plan period. The proposed housing trajectory estimates that homes could be delivered on this site from 2020 but this is far from certain and the site should therefore be de-allocated and added to the future windfall allowance. The Thornfield Holiday Camp site is identified as **site ref. 138** in the Sites Assessments Background Paper (October 2015). The assessment at page 42 states: 'Land at Thornfield Holiday Camp, Staining (residential, employment, retail, community facilities, sport / leisure and tourism) (**site ref. 138**). This site is NOT included in the Local Plan. Staining is a Tier 1: Larger Rural Settlement and already has a commitment for 113 homes. There is no need for further allocations at Staining'. **site ref. 140** in the Sites Assessments Background Paper and the assessment for that, at page 40, states: 'Land at Chain Lane, opposite Community Centre, Staining (residential, employment, retail, community facilities, sport / leisure and tourism) (**site ref. 140**). This site be taken forward as a proposed allocation in the Revised Preferred Option'. The Thornfield Holiday Camp site also does not appear to be included in the SHLAA, although the frontage buildings and a small part is within **site ref. ST06** which was assessed as being 'not currently developable', whereas the land at Chain Lane opposite the Community Centre is included as part of **site ref. ST08** and is assessed as 'developable'. A part of **site ref. ST08** identified as Land to the east of Kings Close, has also received planning permission for the erection of 30 homes that was granted on appeal (APP/M2325/A/14/2220410) on 8th October 2014, confirming the land is deliverable. Therefore, there is uncertainty whether the proposed site allocation at Thornfield Holiday Camp is intended to appear in the draft Local Plan or not (as the supporting evidence base appears to suggest). The land at Chain Lane, opposite the Community Centre (**site ref. 140**), should be included in the Local Plan as an additional housing allocation, or alternatively, as a substitute for the currently proposed allocation at the Thornfield Holiday Camp, which should be deleted.*

Paragraphs 7.80 and 7.86 – Wrea Green

*A landowner has submitted a landholding at Moss Side Lane, Wrea Green as an additional allocation for the development of 50 homes in the Local Plan. It should be noted that no new sites were allocated in the RPO version of the Local Plan for future development within Wrea Green. The incorporation of the additional site would require an amendment to the settlement boundary (policy **GD1**) of the Local Plan.*

A landowner did not agree with the suggestion that no more than 150 homes could be developed in Wrea Green. Wrea Green is identified as a Tier 1: Larger Rural Settlement and is clearly regarded as a sustainable location for housing growth in the rural areas. The council has not allocated enough housing land for the Plan period and Wrea Green is considered a sustainable location for providing some of this housing delivery.

A developer objected to the policy wording for housing delivery in Wrea Green claiming it was vague and did not identify whether or not additional housing would be appropriate or whether or not this number should be expressed as a minimum. Given that the overall target for Fylde is expressed as a minimum, then any target for housing in Wrea Green should also be expressed as a minimum. In addition, having a rigid number based on permissions that have already been granted may not allow the LPA the flexibility to adapt to rapid change as required by the Framework. The policy wording for the delivery of housing in Wrea Green should be expressed as a minimum. In addition, the policy wording should state that the number may be exceeded to help meet the housing needs of the area. The developer also suggested that the housing target figure for Wrea Green be increased to 200 homes to allow any newly arising needs for open market, affordable and specialist housing to be met over the plan period whilst allowing the LPA to adapt to rapid change. In light of the above, it was suggested that the Local Plan address Wrea Green as follows: 'Wrea Green will accommodate a minimum of 200 homes over the plan period. This figure shall include existing commitments for 150 homes as shown on the proposals map. Proposals for additional housing development in or adjacent to Wrea Green will be considered in the context of the presumption in favour of sustainable development. The Neighbourhood Plan for Wrea Green may allocate sites for new housing development, but any housing proposed in the Neighbourhood Plan must not be less than that proposed in the Local Plan in accordance with National Planning Policy. However, the Neighbourhood Plan may allocate more land for housing development should the body promoting the Neighbourhood Plan consider additional housing growth above the Local Plan target to be appropriate.'

To accommodate additional housing growth in Wrea Green, an additional housing allocation was proposed by the developer on land to the North of Mill Lane. Pre-application discussions have already been held with the LPA regarding this site, and the Highway Authority has confirmed that the site can provide a suitable access. The landowner is also willing to bring forward the site for development, and as such, the site is considered to be both deliverable and available for development. Some concerns have been expressed about potential landscape impact, however the site is visually well contained and is viewed in the context of the existing settlement. The site has strong perimeter landscaping that would be retained as part of any development proposal. The SHMA and local housing surveys that have been carried out confirm that there is a prevalence of large detached homes in Wrea Green, and a more limited number of smaller starter homes and retirement properties that older residents could downsize to, which would free-up family housing to younger generations. As such, the

land at Mill Lane could provide for a mix of house types and sizes to accommodate a range of identified local housing needs. Otherwise, the site is sustainably located and is located within walking distance of a number of amenities including a primary school, public house, church, shop (with post office) dental surgery, hairdressers, village hall, cafe, restaurant and an employment estate. Wrea Green is served by a frequent bus service (number 61) which runs between Blackpool and Preston. There are no constraints to the delivery of this site for housing. The development of this site would bring about significant social and economic benefits which weigh heavily in favour of a proposed allocation for housing, and would boost the sustainability of existing services in the settlement.

Another developer commented that paragraph 7.80 confirms that planning permission has already been granted for 150 homes in Wrea Green. As a result, the Council is not proposing to allocate any further sites for residential development within the village. There is no justification or robust evidence provided as to why Wrea Green cannot accommodate further residential development within the RPO document or supporting evidence. Outline planning permission has been granted for up to 49 homes on Land off Willow Drive, Wrea Green (App Ref: 15/0458); however, this site is not shown as a housing commitment on the allocations insert maps. The larger site is also subject of an appeal for an additional home. This appeal was heard at a Public Inquiry in December 2015. The allocations inset map needs updating to reflect the outcome of this Appeal.

An Action Group objected to the statement in paragraph 7.80 that planning permission has been granted for 150 homes in Wrea Green. The Action Group claims that this figure is either incorrect or out of date and should refer to 208 homes.

Paragraphs 7.81 and 7.86 - Clifton

A landowner submitted details of a site: North of Blackpool Road, in Clifton (App Ref: 15/0065) for consideration as part of the Call for Sites in January / February 2015. Fylde Council does not currently have a five year housing land supply, to ensure delivery against its housing targets, the council must provide sufficient sites now and in the future to ensure sites are delivered in the appropriate timeframe. Deliverability is an important element of providing new homes. In light of this, expressions of interest from House Builders have been sent to the council, which demonstrates that the site is attractive to the market and new homes could be delivered in the short term at the site (subject to planning permission). Paragraph 7.81 (and Table 3) of the RPO identify Clifton as having an allocation of 50 homes. This figure has no basis of origin, justification or evidence as to its suitability. The figure appears to be arbitrary, based on the capacity of two sites submitted as part of the non-strategic allocation consultation. The Site Assessment Background Paper (October 2015 page 43) discounted the proposed site (site ref. 20 Land North of Blackpool Road) due to the conclusion that including the site 'would result in an unsustainable amount of development at Clifton, adversely affecting the size and scale of the settlement'. The Framework aims to boost housing supply and plan positively. It is therefore reasonable that the plan should be aspirational and seek to allocate sites that have shown to be deliverable now and not restrict development without the evidence base to support the distribution of homes across the borough. The housing supply position cannot currently be improved without bringing forward sites which are outside the existing settlement boundaries which, in any event, were

drawn in a very different planning environment. Consequently, the landowner would seek to have the site - Land North of Blackpool Road, included as part of the allocation for Clifton and would like the council to include this site in the Local Plan.

A landowner submitted representations in support of the allocation of Land off Clifton Lane, Clifton, measuring 4.8Ha for up to 99 homes, which is not currently allocated as a non-strategic location in the Local Plan. The site is located off Clifton Lane and consists of a large field which is bounded on all sides. To the north, the site is bounded by a hedgerow which continues along the eastern elevation. To the south, the site is partly bounded by existing residential development on Clifton Green, with the remainder and further land to the south-west being subject of a future planning application which will be submitted shortly. An existing woodland and shrubbery defines the western boundary. The site is well contained. The land to the south is subject to a current planning application (Ref: 15/0763) for residential development. The land also consists of a large field, bounded by hedgerows, a woodland and existing housing. Separate access could be taken off Preston Old Road.

A local resident supported new housing on land adjacent to the west side of Clifton with access onto the A583 at Dobbie's traffic lights. New affordable homes are required in the area to accommodate first time buyers. All employers in the area would benefit from a locally based workforce e.g. BAE Systems, Warton and Westinghouse. Clifton already has shops, a post office and hairdressers which could expand with the extra trade.

Council response

Paragraph 7.75

The council agrees with a developer that 'Development Sites located outside the Strategic Locations for Development' should be set out clearly as a new stand-alone policy in Chapter 7 of the next version of the Local Plan.

The council notes an Action Group's objection to 38 homes being developed in Freckleton when Tier 1: Larger Rural Settlements have larger allocations for new homes. Freckleton is a Local Service Centre with a large number of services and facilities, but it is tightly constrained by the Green Belt and areas at risk of flooding. The 38 homes are within the settlement boundary.

Paragraphs 7.76, 7.77 and 7.86 - Elswick

The council notes Wyre Borough Council's comments about development in Elswick. The council is working closely with Highways England on the capacity of the highways network and is consulting with the Fylde and Wyre Clinical Commissioning Group (CCG) about the proposed level of development in the Local Plan and the accompanying Infrastructure Delivery Plan.

The council notes a developer's support for the identification of Elswick as a sustainable settlement for development, and the developer's objection to allocation by means of the Neighbourhood Plan process. Elswick Parish Council has approached Fylde Council and

expressed an interest in preparing a Neighbourhood Development Plan, which would include the allocation of an agreed housing figure. The council notes the developer's claim that the site – Land to the North of Mill Lane – is developable and deliverable; and that sites should be allocated for development within Tier 1: Larger Rural Settlements (see the map at the back of the Responses Report). The settlement hierarchy, which is set out in policy **S1** in chapter 6, focusses development in the four Strategic Locations for Development, and does not include the wholesale development of Tier 1: Larger Rural Settlements.

The council notes the objections made by Elswick Parish Council and 90 residents, together with a petition with 32 signatories objecting to the proposed number of homes proposed for Elswick. In addition, the council received 40 submissions comprising suggested areas for development on land around Elswick; these will be forward Elswick Parish Council for due consideration when preparing their Neighbourhood Development Plan. Following the completion of the Settlement Hierarchy Background Paper, which assessed the level of services and facilities in settlements across Fylde, it became apparent that Elswick did not constitute a Tier 1: Larger Rural Settlement, which could accommodate up to 140 / 150 homes. In actual fact, Elswick constitutes a Tier 2: Smaller Rural Settlement, which could accommodate approximately 50 new homes. The council agrees to reduce the number of homes proposed over the plan period in Elswick from 140 down to 50.

Paragraphs 7.78 and 7.86 - **Newton**

The council notes a landowner's support for the housing allocation on the Land at Newton Hall, on School Lane.

The council notes a landowner's request for the allocation of additional land off Woodlands Close, Newton, measuring 2.6 Ha for new homes (see map at back of the Responses Report). This site was submitted during the Call for Sites in January / February 2015 and the council resolved that this site is not included in the Local Plan as it is located in a proposed Area of Separation. All the representations received regarding development in Areas of Separation are dealt with under policy **GD3** in Chapter 8.

The council notes a landowner's request that additional land be allocated in addition to the Land to the rear of Cobweb Barn, Oak Lane, Newton (SHLAA **site ref. NE06** – Land West of Newton), measuring 2.1 Ha (see map at back of the Responses Report). The site was submitted under the Call for Sites in January / February 2015 and the council considered that the site was potentially suitable as it is adjacent to the rural settlement of Newton, which has a shop, public house and a school. However, part of the site extends into the proposed Area of Separation between Newton and Kirkham. Consequently, the council resolved to only allocate the southern part of the site (i.e. 29 homes). The northern part of the site is not included in the Local Plan as it is located in a proposed Area of Separation.

The council notes the objections raised by an Action Group and 14 residents to the allocation of two sites in Newton to accommodate up to 115 homes, on Land at Newton Hall, on School Lane and at Cobweb Barn, on Oak Lane. The council considers that Newton is a Tier 1: Larger Rural Settlement – as identified in the Settlement Hierarchy Background

Paper – and is capable of accommodating between 100 and 150 homes over the lifetime of the Plan.

The council notes a number of residents commented that development would be acceptable in Newton if it retained existing landscape features, that the new homes were sympathetic to the style and character of the existing homes, include a percentage of starter homes and low cost housing, provides play areas, and significant infrastructure improvements are made to health services, wastewater and electricity infrastructure. The council considers that all of these concerns are covered in policies in the Local Plan (including policy **GD7** in Chapter 8 and policy **H4** in Chapter 10) and infrastructure requirements in the draft Infrastructure Delivery Plan, which accompanied the RPO version of the Local Plan.

Paragraphs 7.79 and 7.86 - **Staining**

The council notes a landowner's and a developer's objections to the inclusion of Land at Thornfield Holiday Camp, Staining, which was submitted during the Call for Sites in January / February 2015 (**site ref. 138**). The council considers that the site should be included as an allocation in the Local Plan as it constitutes the re-development of previously developed land. The council disagrees with the developer that Land at Chain Lane, opposite Community Centre, Staining, which was submitted during the Call for Sites in January / February 2015 (**site ref. 140**) should be included in the Local Plan (see map at back of the Responses Report). The council considers that the inclusion of the site, adjoining the settlement of Staining, would result in an unsustainable amount of development, adversely affecting the size and scale of the settlement. The council notes the comments made about the sites in the SHLAA (31st March 2012). The council intends to issue the latest SHLAA – based on 31st March 2015 figures – alongside the Publication version of the Local Plan, together with an updated version of the Sites Assessments Background Paper. The council will provide robust, up-to-date evidence – with the Publication version of the Local Plan - to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

Paragraphs 7.80 and 7.86 – **Wrea Green**

The council notes the request that a landholding at Moss Side Lane, in Wrea Green be allocated for the development of 50 homes (see map at back of the Responses Report). Wrea Green is a Tier 1: Larger Rural Settlement, where planning permission has already been granted for between 150 and 208 homes in Wrea Green since 1st April 2011. The council considers that there is no need to include land at Moss Side Lane, in Wrea Green in the Local Plan.

The council notes a developer's objection that the council has not allocated enough housing land for the plan period and this is dealt with in Chapter 10.

The council notes a developer's objection to the wording for housing delivery in Wrea Green, claiming it was vague and did not identify whether or not additional housing would

be appropriate or whether or not the number should be expressed as a minimum. The council also notes the developer's suggestion that the housing target figure for Wrea Green be increased to 200 homes; and an additional housing allocation was proposed on land to the North of Mill Lane, in Wrea Green. The council considers that there is no need to include the additional land to the North of Mill Lane, in Wrea Green in the Local Plan.

The council notes a developer's and an Action Group's objection that the reference to planning permission for 150 homes in Wrea Green is incorrect and that it should refer to 208 homes. The council agrees that paragraph **7.80** needs amending to include the homes approved as part of the outline planning permission on Land off Willow Drive, in Wrea Green (App. Ref. 15/0458). The up-to-date housing figures for the whole borough, including Wrea Green, will be issued on 31st March 2016 and these will be presented in the Publication version of the Local Plan in the summer.

Paragraphs 7.81 and 7.86 – Clifton

The council notes a landowner's request for the allocation of Land North of Blackpool Road in the Local Plan. The site was submitted during the Call for Sites in January / February 2015 (**site ref. 20**) (see map at back of the Responses Report). The council did not include the site in the Local Plan. This site has recently been dismissed at appeal. Inclusion of the site would result in an unsustainable amount of development at Clifton, adversely affecting the size and scale of the settlement.

The council notes a landowner's request for the allocation of Land off Clifton Lane, Clifton for up to 99 homes in the Local Plan. The site was submitted during the Call for Sites in January / February 2015 (**site ref. 43**) for a range of uses comprising *residential, employment, retail, community facilities, sport and leisure* (see map at back of the Responses Report). The council did not include the site in the Local Plan. Inclusion of the site would result in an unsustainable amount of development at Clifton, adversely affecting the size and scale of the settlement.

The council notes a resident's support for new homes on land adjacent to the west side of Clifton, which was identified as an allocation in the RPO version of the Local Plan.

Recommendations for change

- Amend paragraph **7.77** of the RPO version of the Local Plan to read: 'In Elswick, a Neighbourhood Development Plan will allocate a suitable site(s) to provide 50 ~~140~~ homes over the plan period, in addition to the existing ~~plan-period~~ commitments. Improvements may be required to the existing A585 Thistleton junction to improve safety and accessibility'.
- Amend paragraph **7.80** to include the up-to-date list of commitments in Wrea Green.
- Amend **Table 3** after paragraph **7.86** by converting it into a new policy: '**SL5: Development Sites outside the Strategic Locations for Development**'.

- Delete 'Elswick' from the list of Tier 1: Larger Rural Settlements and add 'Elswick' to the list of Tier 2: Smaller Rural Settlements. Reduce the number of homes allocated in the policy for Elswick from '140' to '50 (Neighbourhood Plan allocation)'.
- Add a new paragraph to accompany the policy: 'Policy SL5 confirms the number of homes proposed to be completed outside the Strategic Locations for Development over the lifetime of the Local Plan. The council has prepared a Settlement Hierarchy Background Paper which assesses and services and facilities in each settlement. The Background Paper includes Tier 1: Larger Rural Settlements which, the council considers could accommodate between 100 and 150 homes over the plan period; and Tier 2: Smaller Rural Settlements which could accommodate up to 50 homes over the plan period.'
- The council will continue to provide robust, up-to-date evidence – with the Publication version of the Local Plan - to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

Additional recommendations for change

The following additional changes are proposed to update the text to ensure that all recent planning decisions are taken on board at specific sites listed in the text in chapter 7, to ensure the Publication version of the Local Plan is robust and up-to-date.

Additional textual changes

- Amend existing paragraph **7.75** of the RPO version of the Local Plan referring to Freckleton to read: 'Planning permission has been granted for 13 homes in Freckleton, which will be included in the number of commitments. Two A sites have also been allocated in Freckleton to accommodate 25 homes over the plan period. Land to the rear of High Meadows, on Lower Lane will accommodate 13 homes and Number 197 Kirkham Road, north of the bypass will accommodate 12 homes over the lifetime of the Local Plan.'
- Amend existing paragraph **7.81** to read: 'Planning permission has been granted for 30 homes on Land East of Rowan Close, Ash Lane, which will be included in the number of commitments. A site has also been allocated for 20 ~~Fifty homes will be provided on two sites at Clifton.~~ on Land North of 43 Stanagate will accommodate 20 homes over the plan period. and Land East of Rowan Close, Ash Lane will accommodate 30 homes over the lifetime of the Local Plan. In terms of infrastructure, there are issues with contaminated surface water. Any ponds around Clifton should be retained and a significant buffer zone needs to be incorporated between the ponds, the watercourses and the land allocated for new homes.

DRAFT

Chapter 8: General Development Policies

Chapter 8: General Comments

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received in regards to Chapter 8: General Comments.

Recommendations for change

- None

Policy GD1: Settlement Boundaries

Number of representations:

Comment	Support	Object	Total
8	0	7	15

Representations received from:

- Highways England
- Greenhalgh with Thistleton Parish Council
- BAE Systems Real Estate Solutions
- 5 Landowners
- 2 Developers
- 1 Action Group
- 1 Resident

(Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.)

What you said

Highways England refer to the additional wording which allows for the loss of the best agricultural land if there is a requirement for sites allocated in the Plan or the land is

required for strategic infrastructure. They consider this amendment should not present any particular concern for Highways England.

Greenhalgh with Thistleton Parish Council stated they wished to see changes to the plan to limit expansion of development into the countryside through a requirement to use available 'brown-field' sites before Greenfield land, setting a proper value on BMV land and not discounting areas of less than 20 ha, as the character of Fylde is set by the rural hinterland.

*BAE Systems Real Estate Solutions commented that it is unhelpful that the RPO does not include a copy of the Policies Map to show settlement boundaries, other designations and allocations, and should have been included at this stage rather than at Publication Version. BAE Systems believe that the north side of Warton Aerodrome, which is an intensively developed area with significant infrastructure and built development, within the Enterprise Zone, should be included within the settlement boundary of Warton. Policy **GD1** 'Settlement Boundaries' supports development of previously developed land within settlements subject to other relevant local plan policies being satisfied. Including the north side of the aerodrome within the settlement boundary would ensure that any future development opportunities have this in principle policy support.*

A landowner suggested that the need for settlement boundaries has not been justified, given the other criteria based policies within the RPO to assess development proposals. They state that settlement boundaries will be unnecessary and unduly restrictive and will not allow the plan to evolve and adapt to changing circumstances such as housing need. If boundaries are to be adopted then they should have sufficient flexibility to allow unallocated sites adjoining settlements to come forward where they are required.

A developer suggested that a site at Moss Side Lane, Wrea Green be allocated as a development site, as no new sites have been allocated in the local plan.

*A further developer stated that the four allocated sites at Kirkham and Wesham are included within the appropriate settlement boundary line. Specifically, the allocation at **HSS9** should be included in the settlement boundary.*

In addition, a developer objected to the policy in its current form as it is not justified or effective. To achieve the housing requirement the council need to allocate land in Elswick through the Local Plan.

A landowner requested that their site at Warton is included within the settlement boundary in Warton as the site would help support Warton's status as a strategic location for development.

A landowner stated that the borough's settlement boundaries quite clearly need to be revisited to provide sufficient housing land for the Plan period however they are aware that they will be unable to view these boundaries until the Publication version of the Plan is produced.

The Action Group questioned the credibility of the policy in that it wasn't applied on a previous planning application.

A resident commented that the policy is unsound in respect of seeking to set policy settlement boundaries for Warton within the plan without first identifying the strategic development areas.

Council response

The council acknowledges Highways England's comments.

The council agrees with Greenhalgh with Thistleton Parish Council that development should be encouraged on previously developed sites first. However, as there is insufficient previously developed land within the borough, the council will need to look at greenfield sites in order to meet its Objectively Assessed Need.

The council disagrees with BAE System's Real Estate Solutions comments, that land to the north side of Warton Aerodrome should be included within the settlement boundary of Warton. The Policies Map will identify areas of existing employment land, including the Enterprise Zones, together with any new employment allocations.

The council notes a landowner's comments that settlement boundaries are an essential part of any Local Plan as they help restrict urban sprawl and unwanted development. The council has identified sufficient land within the borough to provide its allocated housing requirements and the yearly Authority Monitoring Report (AMR) will assess growth in the borough, to ensure growth is being delivered at the Strategic Locations for Development.

The council disagrees with the suggestion by the developer to add more sites at Wrea Green. Wrea Green has had a number of applications approved for a total of 208 new homes and as such the council consider to allocate any further sites would be disproportionate and unsustainable.

All strategic sites allocated adjacent to existing settlements will be included within the settlement boundary and set out on the Policies Map. Each existing settlement boundary will be assessed and amended accordingly taking consideration of any allocations or commitments.

The council notes the comments made by the Action Group.

The council notes a resident's comments regarding the allocation of housing land in Warton. Warton Parish Council is currently producing a Neighbourhood Plan and as part of that process has allocated land for new homes and other strategic development areas.

Recommendations for change

- All existing employment sites, including the designated Enterprise Zones will be identified on the Policies Map, which will accompany the Publication version of the Local Plan.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 8, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Delete the following wording from the third paragraph in policy **GD1**: ‘~~outside settlement boundaries~~’.
- Amend the last two sentences of paragraph **8.1** to read: ‘However, where strategic and non-strategic sites are allocated adjacent to existing settlements, forming urban extensions - the settlement boundaries ~~will be~~ have been amended on the Policies Map so as to include them within the settlement boundary. ~~The precise alterations to these settlement boundaries will be set out on the Policies Map which will accompany the Publication version.~~’

Policy GD2: Green Belt

Number of representations:

Comment	Support	Object	Total
3	1	2	6

Representations received from:

- Newton with Clifton Parish Council
- Campaign to Protect Rural England (CRPE) – Fylde District
- 1 Developer
- 2 Residents

What you said

Newton with Clifton Parish Council commented on designated land protection areas, and stated that ideally these should be increased in number. To facilitate proper protection of such designated areas development of previously developed land and surplus employment land should be maximised.

The CPRE – Fylde District commended the council for its continued protection of land designated as Green Belt in the borough. (CPRE – Fylde District has occasionally supported minor alterations where exceptional circumstances existed).

A developer who owns land at Queensway which is currently allocated for employment (ES1), also owns land to the east of that site which is designated Green Belt land. The developer wished to see this land removed from Green Belt so it can be included in a planning application they are hoping to submit for residential development on this site and ES1. They quote paragraph 85 of the Framework, and state that removing land from this area will not materially harm the purposes for which the Green Belt was designated.

One resident objected that part of land in their ownership had not been removed from Green Belt and states a number of reasons why this land should be removed including the shape of the land, its situation, that the land in question has been in and out of Green Belt for a number of years, and removing it would not create a precedent. Furthermore, removing the land from Green Belt would clean up this derelict area of land.

A further resident referred to land known as Syke Hall, and suggested that as housing has been permitted around that area, this site will serve no Green Belt purpose, but would be totally enclosed and contained by surrounding new housing. This therefore provides clear exceptional circumstances to re-define the Green Belt boundary to exclude land which it is not necessary to keep open permanently.

Council response

In response to Newton with Clifton Parish Council comments and the two residents' comments, it was resolved by the council when it embarked on preparing a new development plan that 'no strategic review of the Green Belt within Fylde will be undertaken when preparing the Local Plan, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies' (paragraph 8.6 in Chapter 8).

The council notes CPRE – Fylde District's comments.

In regards to the comments submitted by the developer and residents, the council will not be undertaking a strategic review of the Green Belt boundaries at this stage, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.

In addition, the council disagrees that removing land from Green Belt would not cause any material harm. The Framework clearly states that inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It goes on to state that a local planning authority should regard the construction of new buildings as inappropriate development in the Green Belt unless they fall within one of the exceptions listed within the Framework, which this development does not fall into, and as such is contrary to national policy.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 8 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the first sentence policy **GD2** to read: 'The Green Belt ~~will be~~ within Fylde ~~is~~ shown on the Policies Map.'
- Delete the last sentence in paragraph **8.4**: '~~It is considered that there should continue to be a distinction between the 'open land outside settlement boundaries' and Green Belt land, in terms of what should be permitted upon it.~~'
- Add the following sentence at the start of paragraph **8.6**: 'There are four tracts of Green Belt within Fylde: i) between Kirkham and Freckleton; ii) between Lytham and Warton; iii) between St Annes and Squires Gate; and iv) between Staining, Blackpool and Poulton-le-Fylde.'

Policy GD3: Areas of Separation

Number of representations:

Comment	Support	Object	Total
7	5	8	20

Representations received from:

- Kirkham Town Council
- Newton with Clifton Parish Council
- Treales Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CRPE) – Fylde District
- 2 Landowners
- 1 Developer
- 1 Action Group
- 9 Residents

(Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.)

What you said

There was support for the policy, however there were a number of comments/objections to the policy with other areas of separation suggested at:

- *Wesham and Mowbreck*
- *Kirkham and Treales*
- *Westby and Whitehills*
- *Wesham and Greenhalgh/Medlar/M55*
- *Poulton and Singleton*
- *Kirkham to Westby*
- *Kirkham to Wesham*

Treales, Roseacre and Wharles Parish Council claimed there should be an Area of Separation recorded between Wesham and Mowbreck and Kirkham and Treales in order to protect the distinctiveness of these environments.

A number of residents requested changes to the proposed boundaries to include more land, most notably between Kirkham and Treales.

Local landowners and developers requested that certain designated parcels of land be removed from the Areas of Separation.

A further landowner objected to the automatic preclusion of new homes being built within the curtilage of existing homes.

An Action Group commented that the original boundary of the Area of Separation between Wrea Green and Kirkham has been decreased without any consultation.

Council response

As part of the previous consultation process a number of other Areas of Separation were suggested, including all of the above, each of these were individually assessed within an Area of Separation Background Paper, published in 2014. As part of the assessment criteria various considerations were taken into account including:

- Distance between settlement or built up areas (at narrowest point)
- Current land use
- Landscape character
- Topography
- Development pressure
- Planning application history
- Local Plan designation
- Other relevant designations

Based upon the assessments undertaken only two sites were taken forward (Kirkham and Newton, and Wrea Green and Kirkham) as none of the other suggested areas met with the criteria. Proposing too many Areas of Separation without proper justification and assessment could lead to a risk of the Area of Separation policy being found unsound at the Local Plan Examination in Public.

In response to the residents' comments, Treales lies within open countryside which offers protection from development and the council does not agree that development has 'creeped' in so far that it would warrant an Area of Separation, in fact the council considers there has been little development pressure in this area.

In response to local landowners wanting their land to be removed from the Areas of Separation, the proposed boundaries have been set to ensure all land within them is protected from future development to ensure built development does not merge neighbouring settlements so that the identity and distinctiveness of each settlement is not lost. To leave certain areas out for potential development in the future, only contradicts the primary function of an Area of Separation and as a result the council will not amend/reduce the size of the proposed boundaries.

Areas of Separation are defined as areas that are free from built development and are designated as such to avoid coalescence, therefore allowing new homes in existing curtilages would lead to more development contradicting the principle of an Area of Separation.

The original Area of Separation boundary between Wrea Green and Kirkham has been altered following an appraisal by the council's Urban Design Officer. A small area of land was removed and the boundary changed to follow the natural tree line. As the boundaries had

not yet been formally adopted there was no legal need to consult with either residents or statutory consultees.

Recommendations for change

- None

Additional recommendations for change

The following additional change is proposed to clarify and update the existing text in Chapter 8 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the second sentence in policy **GD3** to read: 'Areas of Separation identified on the ~~Inset~~ Policies Map'

Policy GD4: Development in the Countryside

Number of representations:

Comment	Support	Object	Total
4	1	4	9

Representations received from:

- Highways England
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Campaign to Protect Rural England (CRPE) – Fylde District
- 3 Landowners
- 1 Developer
- 1 Resident

What you said

Highways England did not consider this policy to present any particular concern.

Medlar with Wesham Town Council are concerned that development of any kind is built in the countryside.

Newton with Clifton Parish Council considered that there has been too much development in the countryside and to support such policies will adversely impact on traditional rural employment opportunities. Members of the council understand that there is going to be future job reductions at BAE, and the designated Enterprise Zones will not match the reduced employment opportunities.

The CPRE – Fylde District recommended that areas of countryside be designated as done in the existing Local Plan, as designations must be linked to policies. Since the Policies Map is not yet available they assume that the countryside area designation would exclude:

- *Land within settlement boundaries, including the urban areas*
- *Green Belt and Areas of Separation*
- *Allocated employment land*
- *Large development sites specified in Policy **GD5***
- *Tourism and recreation sites*
- *Designated open space*

They also commented that the term countryside area should be used where appropriate in other policies.

*In addition, the CPRE – Fylde District wished to see outdoor advertisements, especially in the countryside, controlled explicitly by a policy in the Local Plan and that policy **GD4** should refer to advertisements in the countryside being controlled by the policy.*

One landowner suggested that the word ‘minor’ be removed as it is not supported by the Framework, and any extension should be considered on its own merits. Furthermore, they suggest an additional exception should be added to include previously developed land.

A further landowner commented that a certain area of land included within an Area of Separation should be removed and left as countryside.

One resident commented that unless defensible long term settlement boundaries are established, development sites could be allocated within neighbourhood plans, which is an unsound approach.

Council response

The council notes Highways England’s comments.

In regards to the comments made by Medlar with Wesham Town Council, there are certain forms of development that are necessary to support the rural economy, and as such to prevent any new development in the countryside would be impractical and unrealistic and would not accord with the Framework.

Policy **GD4** aims to limit development in the countryside but also to support the rural economy. So although the council appreciates Newton with Clifton Parish Council’s comments in regards to development already being built in the countryside, once adopted this policy will be used to determine planning applications.

The council will be identifying countryside areas on the Policies Map along with the other designations as listed above. In relation to CPRE – Fylde District’s comments regarding a separate policy on advertisements, there is a section in policy **GD7** which refers to advertisement policy. Furthermore the council intend to produce a Supplementary Planning Document (SPD) on Advertisements in the near future.

In response to the landowner’s comments, the council disagrees with removing the word ‘minor’ from the policy. This provision has been included to ensure that any proposed extensions to existing homes or other non-residential buildings do not prejudice the character of the countryside. Additionally the council does not agree that there should be an additional exception for previously developed land as this could lead to unsustainable development taking place which is incompatible with the surrounding countryside.

Comments relating to land removal from Areas of Separation have been covered under policy **GD3**.

All settlement boundaries will be shown on the Policies Map which will accompany the Publication version of the Local Plan. Any allocations made as part of a Neighbourhood Development Plan would be assessed at that time and subject to referendum.

Recommendations for change

- The council will produce a Supplementary Planning Document on advertisements for the borough.

Policy GD5: Large Developed Sites on land outside settlement boundaries

Number of representations:

Comment	Support	Object	Total
3	0	1	4

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- 1 Landowner
- 1 Resident

What you said

Highways England stated that their previous support could be maintained as this policy has been subject to a number of amendments, which includes the text 'large development sites in the countryside to be supported by the road networks'.

BAE Systems Real Estate Solutions commented that the policy should also refer to large developed sites on land adjacent to settlement boundaries.

A landowner stated that the policy should not be solely restricted to large sites.

*A resident commented that in relation to cycle paths in **part e)** of policy **GD5**, if not designed well and dry cycle storage provided to make this work will make the scheme not fit for purpose.*

Council response

The council notes Highways England's comments.

In regards to the wording of the policy, the policy name and supporting text will be amended to read: 'Large Developed Sites ~~on land outside settlement boundaries~~ in the Countryside.' As the BAE Systems site at Warton is located in the countryside this site would adhere to the criteria as set out.

The council considers that smaller developments on previously developed land outside settlement boundaries should meet the criteria as set out in policy **GD4**. Policy **GD5** solely deals with the larger developed sites within the borough, of which there are a considerable number.

The council noted the comments made by the resident. The council will consider how best to encourage this sort of development within proposed schemes at application stage and as stated in policy criterion i) of policy **GD7**. Furthermore, cycle provision is set out in detail in **section 2** of the **Infrastructure Delivery Plan** (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- Amend Policy **GD5** and the supporting text to read: 'Large Developed Sites ~~on land outside settlement boundaries~~ in the Countryside.'

Policy GD6: Promoting Mixed Use Development

Number of representations:

Comment	Support	Object	Total
3	1	0	4

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- 1 Resident

What you said

This policy has been subject to a number of amendments, however, the overall approach remains the same and as such Highways England's previous comments remain applicable, which basically support the promotion of mixed use development within close proximity to key centres and sustainable transport modes.

BAE Systems Real Estate Solutions suggested that an additional criteria should be applied to refer to viability issues where mixed use development with housing is proposed, as such schemes can often cross subsidise those elements of a development that maybe non-viable.

*A local resident raised concerns in regards to design and provision of safe cycle connections, as if poorly constructed would be obsolete as no-one would use them. Furthermore the council should define the term 'friendly environments' in point e) of paragraph **8.18**, and define minimum standards within the Plan for developers to work to.*

Council response

The council notes Highways England's comments.

The council notes comments made by BAE Systems Real Estate Solutions. Where a mixed use development is submitted, the council will consider the development as a whole. However, the council will review the wording of policy **GD8** to ensure this is covered appropriately.

The council notes the concerns raised by the resident, however, each planning application will be assessed on its own merits, and such issues will be addressed at that stage. Furthermore, cycle provision is set out in detail in **section 2** of the **Infrastructure Delivery Plan** (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- None – however amendments to cover the question raised on viability by BAE Systems will be looked at in policy **GD8**

Additional recommendations for change

The following additional change was proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following text to the first paragraph of policy **GD6**: 'New businesses will be encouraged to locate within the settlements and in the redeveloped sites. Community facilities should be multi-functional – this could include areas for skills training programmes. Local businesses should be encouraged to provide training or apprenticeships to local people.'

Policy GD7: Achieving Good Design in Development

Number of representations:

Comment	Support	Object	Total
4	1	9	14

Representations received from:

- Highways England
- Homes Builders Federation
- Lytham St Annes Civic Society
- Campaign to Protect Rural England (CRPE) – Fylde District
- 1 Landowner
- 1 Developer
- 1 Action Group
- 1 Resident

What you said

*Highways England supported policy **GD7**.*

Lytham St Annes Civic Society commented that this policy should be used to ensure that developers do not roll out standard house types, all of which are inappropriate particularly in Lytham.

CPRE – Fylde District made comments relating to advertisement consent in rural areas.

The Home Builders Federation, a developer and a landowner, questioned a number of elements within the policy in particular criteria m) and p), as it states that the government have specifically identified that these two elements should be dealt with via Building Control and that the council cannot require developers to go beyond these regulations.

In addition, a developer suggested that the words ‘where possible’ should be added to the beginning of criterion t) in relation to Public Open Space, and that the text should read ‘off site’ rather than ‘on site’ at the end of the paragraph.

The Action Group made various comments, the majority of which are related to past planning decisions in Wrea Green.

A resident commented that the term cycleways of a ‘high quality’ is repeatedly used. However, these standards have not been defined, and as such we could have cycle routes and pathways not fit for purpose. In addition, ‘appropriate measures’ are provided... there needs to be a definition or this point has no value, a simple white line or shared environment is not appropriate, if these policies are left with no weight behind them then nothing will be achieved.

Council response

The council notes the comments made by Highways England and Lytham St Annes Civic Society.

The council notes CPRE – Fylde District’s comments which have been dealt with under the responses to policy **GD4** above.

In response to the Home Builders Federation and developer’s comments the council has reviewed the latest Housing and Standards Review and ministerial statement dated 25th March 2015, and consider that information contained in this encourages council’s to use this set of standards, which complement the existing set of Building Regulations, which are mandatory.

The council disagrees with a developer that the addition of ‘where possible’ at the beginning of criterion t) in policy **GD7** is required, as the paragraph goes on to say *unless it is agreed by*

the council...etc. However, the council agrees that the final wording should state 'off site' rather than 'on site'.

The council notes the Action Group's comments.

The council notes the resident's concerns about cycle paths, but does not consider that further details in relation to cycle path standards need to be defined. Each planning application submitted would be assessed on its own merits and the relevant statutory body consulted to ensure the development was designed and built to the correct specifications and fit for purpose. Cycle provision is set out in detail in **section 2** of the **Infrastructure Delivery Plan** (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- Amend text in part t) to read 'off site' rather than '~~on site~~'.

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add a new criterion to policy GD7: 'Secured by Design principles should apply to all new developments.'
- Add the following text to the end of criterion g) in policy GD7: 'and using sustainable natural resources where appropriate.'
- Add the following text to existing criterion k) in policy GD7: Protecting existing landscape features and natural assets as an integral part of the development; requiring multi-functional green infrastructure to be integrated into urban areas; providing enhancements to open spaces to encourage people to use them;
- Amend existing criterion m) in policy GD7 to read: 'All new ~~housing developments~~ homes should comply with all relevant design and quality codes in the National Technical Standards.
- Add a new criterion under Highway Safety in policy GD7: 'The needs of non-motorised users, such as pedestrians and cyclists, should be prioritised over other road users, through design measures.'

- Add a new criterion and sub-heading in policy GD7: ‘Waste Management - Local waste management facilities and neighbourhood waste management facilities for the separation, storage and collection of waste, should be provided to increase the efficiency of its subsequent re-use, recycling and treatment.’

Policy GD8: Demonstrating Viability

Number of representations:

Comment	Support	Object	Total
1	1	2	4

Representations received from:

- Bryning with Warton Parish Council
- 1 Landowner
- 1 Developer
- 1 Action Group

What you said

*Bryning with Warton Parish Council supported policy **GD8** in principle but suggested that the council works closely with users of the Enterprise Zone to ensure future employees do not drive through the centre of Warton.*

The developer and landowner both consider the policy to be unsound as it places far too onerous and unjustified restrictions on the developer, and consider a 12 month period is unnecessary and contrary to the Framework.

The Action Group referred back to a specific planning application in Wrea Green and questioned sustainable locations.

Council response

The council notes Bryning with Warton Parish Council’s comments.

The council will clarify and update the existing text, removing the text referring to a 12 month period.

The council notes an Action Group’s comment but considers they are not relevant to this consultation process.

Recommendations for change

- Review the text in regards to viability as discussed under policy **GD7** and the comments made by BAE Systems Real Estates Solutions.
- Delete the following words from criteria a) and b) in policy **GD8**: ~~'Following a 12 month marketing exercise'~~ and delete ~~'appropriate'~~ from criterion c).

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text and make policy **GD8** more robust and fit for purpose, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add cross references to other policies in policy **GD8** (i.e. leisure, culture and tourism policies).

Chapter 9: The Fylde Economy

Chapter 9: General Comments

Number of representations:			
Comment	Support	Object	Total
9	0	6	15 ²

Representations received from:

- Lancashire County Council
- Treales Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- CPRE - Fylde District
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Landowner
- 1 Resident

What you said

Lancashire County Council commented that the Blackpool Airport Corridor Enterprise Zone needs to be referenced and considered throughout the plan as appropriate including implications for infrastructure requirements. This should include a new policy for the site.

Treales Roseacre and Wharles Parish Council noted the Growth Accelerator programme has been deleted from the support portfolio of the UK Government.

Treales Roseacre and Wharles Parish Council have made detailed comments on paragraph 9.8 – Fylde Coast Energy Hub. These comments are duplicated under Chapter 3 in relation to the Local Plan Vision for Fylde and Strategic Objective 4 in Chapter 4. They objected that there was no evidence presented that supports a Fylde Coast Energy Hub. There has been a world-wide supply chain for energy for decades. Fylde companies already address this. The aviation support activities at Blackpool Airport to service the offshore wind and gas industry are well established. The geographical aspects of the marine off-shore support industry are principally located around Heysham. Fleetwood proposes further development. Neither of these fall within Fylde's remit. There is no evidence presented why companies would elect to locate additionally in the Fylde. Even Cuadrilla have already shown that their preference is to locate in Central Lancashire. Commodity based economies are highly sensitive to external conditions outside the control of the area. Arup have assessed in the Roseacre Wood and Preston New Road applications that shale gas produces a total of 11 equivalent jobs during the exploration and appraisal site throughout the national/international supply chain. LCC indicate that few of these jobs will be sourced locally. The introduction of heavy industrial

activity in the rural areas will have adverse impacts on the amenity and other economies of these areas.

Treales, Roseacre and Wharles Parish Council commented that if shale gas development is assumed to be in the rural areas, then this needs to be included in all references about impacted other components of the economy including the visitor, residential, retirement, leisure, food production and inward investment economies. If the Fylde area is prospectively less attractive and less healthy than other areas, then stakeholders will select other choices. It is not apparent that FBC has commissioned its own up to date research to assess the impacts.

As part of their response, Treales, Roseacre and Wharles Parish Council, raise specific questions as follows:

- What is FBC's Governance regime over The Blackpool Wyre and Fylde Economic Development Company? How is it directed by FBC and how is its outputs considered with what weight?*
- Does the EDC anticipate future fracking sites at the energy hub?*
- There is no appraisal of any other sites, so why would there be a requirement for an energy equipment store?*
- Paragraph 9.8 refers to a study when was that commissioned, by whom and when was it supposed to produce its findings?*
- What is the evidence base for the requirement for an energy logistics park? This sounds like a big equipment store?*
- Is this an activity that fits within the Fylde vision? What is the evidence base for an energy hub?*
- Alternatively, would exploration and appraisal hub (fracking) sites be encouraged at the Blackpool EZ site or other Fylde locations on the coast? Is Blackpool Council supportive of this or would they prefer to encourage exploration and appraisal site development within their own authority boundary?*

Treales Roseacre and Wharles Parish Council noted the historical demand for 2.7 Ha of employment land per annum. They go on to question what employment does that generate per Ha and how does that compare with the requirement to generate 6000 new high value added jobs at the Warton and Samlesbury LEZ sites plus a further 5000-7000 indirect jobs? This should be consistent or an additional action should be identified to facilitate the achievement of the economic development objectives.

Bryning with Warton Parish Council; CPRE - Fylde District; and a resident expressed concern at the methodology used in the calculation of the needs of the Borough reliant on the Fylde

Employment Land and Premises study 2012. They all believe the requirement for new employment land in Fylde is overstated.

Bryning with Warton Parish Council stated that from the evidence of unoccupied vacant sites, such as at Westby, throughout the Fylde that the need is greatly reduced from that assessed. The reduced needs of employment Land proposed would assist the reduced need for residential development on Green fields land.

CPRE - Fylde District raised comments specifically in relation to paragraphs 9.9-9.12. The oversupply of land for employment use has the knock-on effect of precluding such land being used for housing. This may 'wrongly' justify further allocation of housing on greenfield sites. They go on to make comment about the AECOM/BE Employment Land and Premises Study (Reference 8) published in August 2012. The Study presents a range of 7 models to predict the quantity of employment land required, and only the largest of the predictions, based on historic trend, is recommended. They shared the concerns about the Study expressed in the Employment Land and Premises Minority Report produced by independent councillors. (Reference 9).

We are now concerned that the total employment land required has increased from the Preferred Options, albeit partly due to the extension of the Plan Period from 2030 to 2032:

Preferred Options:

*26 ha of additional employment land proposed by the Study
+7.5 ha to compensate for loss off the Heyhouses DWP site to housing
+15 ha to satisfy Blackpool employment land needs
Total 48.5 Ha*

RPO net requirement:

*52.3 Ha for a 21 year Plan (2.49 x 21)
- 2.2 Ha new since 2011 start of the Plan
-7.7 Ha with permission or under construction
+ 14 Ha for 'Blackpool's requirement up to 2027'
Total 56.5 Ha (56.3 in policy EC1)*

The RPO states (paragraph 9.9) If long term trends continue, the study recommends that Fylde Council will need to cater for an expected annual take-up of 2.7 Ha rolled forward to the end of the Local Plan period. This historic take-up figure has been corrected to exclude sui generis development. Consequently, the annual average take-up rate of 2.49 Ha for Fylde results in a requirement of 52.3 Ha for the plan period. CPRE – Fylde District is not aware of the evidence for this correction and without such evidence queries whether it is justified from a 'soundness test' perspective. Can the Council please provide details as to where the calculation for this correction came from?

A resident raised a number of objections to this section at 9.1, 9.3, 9.5 and 9.9 as follows:

9.1 This flawed conclusion results from a failure to recognise the movement of employment land across the Borough (leading to some requirement for new sites) and the total employment land in use (reducing steadily over the last 20 years).

9.3 *This statement of economic growth is inconsistent with some of the economic reports commissioned by the Borough. In fact some records of Fylde's economic performance show periods of relative decline regionally. Suggest you check your figures.*

9.5 *This is highly misleading. Even if the Warton EZ performed as hoped, it would barely cover the planned and expected job losses at Warton's BAE System's site. In fact performance of the EZ (in creating jobs) has been spectacularly unsuccessful to date.*

9.9 *The previously mentioned flawed conclusions that have been drawn from this study, have never been satisfactorily answered.*

*In addition to the above CPRE - Fylde District disapproves of the lack of a specific policy for the rural economy. (We had commended such a policy **EC3** in the Preferred Options). After all, in terms of the constituency of Fylde 84% is countryside, 10% of which is Green Belt and the other 72% is unprotected countryside (based on March 2015 DCLG data).*

It is recommended that a specific Policy for the Rural Economy is re-instated to address the following RPO statements:

- **2.62** *Agriculture and agricultural diversification (including energy crops), is an important industry for the Fylde rural economy, despite undergoing considerable change in recent years.*
- *Strategic Objective 2: To maintain, improve and enhance the environment by 7) Protecting significant areas of best and most versatile agricultural land.*
- *Strategic Objective 4: To diversify and grow the local economy by 10) Supporting and protecting agricultural and farming operations as a key element of the local economy.*
- *The policy for the rural economy must also ensure that the Council seeks to ensure that the loss of any agricultural land is kept to a minimum, and that new development is not located or designed in such a way as to create unnecessary conflict between urban fringe development and farming operations. (cf. Local Plan Policy EP22).*

The Blackpool, Fylde and Wyre Trades Union made comment in relation to paragraph 9.8. They welcome new development in the Fylde, including new homes and jobs and strongly support the emphasis on sustainability. The plan should therefore not include any extension of fossil fuel extraction via the shale gas method.

A landowner made comment in relation to paragraph 9.9 and in so doing referenced paragraph 7.69 which states that the Employment Land and premises Study also identifies that the allocation of some sustainable employment sites on the edge of settlements is necessary as there is limited capacity within the existing settlements for new employment development. The research identified eight possible broad areas of search where additional future employment land allocations might be delivered. The landowner goes on to suggest why their site, Corner Hall Farm, near junction 3 of the M55 could contribute towards the Borough's balanced portfolio of employment land allocations.

Council response

In response to Lancashire County Council, the council will include a policy in Chapter 9 of the Publication version of the Local Plan, relating to the Blackpool Airport Enterprise Zone.

In response to Treales Roseacre and Wharles Parish Council, the council will remove the heading 'Local Growth Accelerator Strategy' and related paragraph **9.6**.

Treales Roseacre and Wharles Parish Council have raised a number of issues relating to the potential impacts of Shale Gas exploration in the borough. Shale Gas exploration and exploitation is a matter for consideration in the Minerals and Waste Local Plan prepared by Lancashire County Council who have commenced preparation of a Supplementary Planning Document on this matter. Counter arguments for and against shale gas exploration and its potential indirect impacts on the borough have been made. The industry in Fylde is in a pre-exploration phase, but if a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.

The specific questions raised by Treales Roseacre and Wharles Parish Council are each addressed in-turn below:

- *What is FBC's Governance regime over The Blackpool Wyre and Fylde Economic Development Company? How is it directed by FBC and how are its outputs considered with what weight?*

The first sentence of paragraph **9.8** sets out the current governance regime and details regarding the governance of the EDC is available on their website at: <http://www.bfwedc.co.uk/governance>. Further information is also included in an information item to the council's Development Management Committee, on 20 January 2016.

At the council's Development Management Committee, on 20 January 2016, it was resolved to ask Full Council to consider the governance/feedback arrangements of the Economic Development Company (EDC) and that an updated report be presented to committee in due course.

- *Does the EDC anticipate future fracking sites at the energy hub.*
The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.
- *There is no appraisal of any other sites, so why would there be a requirement for an energy equipment store?*

The level of information known about various potential development sites identified in the RPO varies. Where additional information is available, this has been reflected in the RPO. In the Ministerial Statement³ the Government conclude that ‘...Blackpool is to become the latest place to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector, boosting the local economy...The Minister said that the move would attract greater inward investment and help deliver hundreds of new jobs. It will also provide an opportunity to secure the long term future of Blackpool Airport.’ The statement goes on to say ‘The Blackpool Enterprise Zone will become a centre of excellence for the energy sector, with plans for a new Energy HQ, a dedicated new training facility to be developed by Blackpool and Fylde College. Backed by £6.2 million Growth Deal funding, it aims to provide job-ready students in engineering and advanced technology.’

The Development Management Committee, on 10th February 2016, planning permission was granted for the erection of a two storey college building at the site of the former airport terminal building (ref: 15/0811). This development will support energy businesses on the Fylde Coast.

- *Paragraph 9.8 refers to a study when was that commissioned, by whom and when was it supposed to produce its findings?*

Paragraph 9.8 does not actually refer to a ‘study’. Paragraph 9.8 does however refer to ‘investigating the creation of an energy hub’; and ‘initial planning of a logistics park’. In this regard, as drafted, it was referring to the Enterprise Zone bid for Blackpool Airport. The application for EZ status was co-ordinated by the EDC.

Paragraph 9.8 will be updated to reflect the most up to date position concerning EZ status and becoming a centre of excellence for the energy sector.

- *What is the evidence base for the requirement for an energy logistics park? This sounds like a big equipment store?*

The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this responses report.

- *Is this an activity that fits within the Fylde vision?*

The council considers that this is an activity that fits within the Fylde vision. Paragraph 4 of the Local Plan Vision states ‘... Fylde will have an energy hub, generating a cluster of energy based companies and amenities; together with an energy logistics park, close to Blackpool Airport, to support energy businesses on the Fylde Coast.’

Furthermore, the council’s Economic Development Strategy and Action Plan 2012 to 2030 (January 2013), also includes the following vision ‘The Council and its partners

will work together to ensure that the economic opportunities created by Government energy policy are maximised in the Fylde’.

- *What is the evidence base for an energy hub?*
The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.
- *Alternatively, would exploration and appraisal hub (fracking) sites be encouraged at the Blackpool EZ site or other Fylde locations on the coast?*
This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report as proposals relating to the exploration and exploitation of mineral resources are addressed in the Minerals and Waste Local Plan.
- *Is Blackpool Council supportive of this or would they prefer to encourage exploration and appraisal site development within their own authority boundary?*
This question has been forwarded to the Head of Development Plans and Projects at Blackpool Council and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.

In responding to Treales Roseacre and Wharles Parish Council’s query about standard job densities, the Employment Land Study never ‘squares up’ land and jobs nor does the Local Plan. It forecasts land demand by using historic take-up to give a land based answer. It then considers economic modelling to give job forecasts where the impact of Warton Enterprise Zone was considered and gives indications about the likely future growth/decline of jobs. This job forecasting is repeated in the SHMA.

The Employment land and Premises Study was commissioned to provide robust evidence to underpin and inform the Council’s Local Plan. It analyses employment land demand, supply and need to 2030. AECOM and BE Group were the consultants appointed to compile the report. It was carried out during 2012. The Study comprises five main elements:

- An assessment of the Borough’s economy that informs the amount, location and type of employment land and premises required to facilitate its development and growth
- A review of the current portfolio of employment land and premises
- Identification and appraisal of additional potential employment land which could be used to meet the Borough’s future land needs
- An assessment of the potential impact of major public and private sector development proposals, notably the Enterprise Zone at Warton
- Recommendations on the future allocation of employment land and premises to maintain the Borough’s economic growth.

In September 2014, BE Group produced a briefing note to support and expand upon key issues raised by the Employment Land and Premises Minority Report produced by independent councillors, in response to the Fylde Employment Land and Premises Study. It was been carried out on behalf of the council and covers the following key issues:

- Further explanation as to why historic take-up was chosen as the preferred method of forecasting Fylde's future land needs over the alternative, jobs change, methods
- The importance of the qualitative market analysis of the ELPS in understanding demand for employment land and premises
- Issues associated with land monitoring by the Council which are of relevance to ELPS findings
- BE Group's experience in preparing and delivering Employment Land Reviews.

This briefing note is available as part of the Local Plan's evidence base.

The historic take-up figure has been corrected so as to exclude the sui generis uses which were previously recorded. 3.36 Ha in 2008/2009 and 0.61 Ha in 2009/2010 have been discounted from the historic take-up rate 1989 - 2011. Essentially these figures comprise car dealerships in the Whitehills area.

The difference in the employment land requirement figure stated in the Preferred Option Local Plan and the RPO Local Plan is in part due the plan period being extended from 2030 to 2032. The RPO net requirement is 56.5 Ha. Policy **EC1** slightly under provides for this, allocating 56.3 Ha. The other salient point is that the Preferred Option Local Plan referred to additional employment land. This was land over and above the land allocated in the adopted Fylde Borough Local Plan. The RPO Local Plan does not net-off any existing allocations and all proposed allocations are baselined as forming part of the supply.

A background paper will be prepared which sets out detailed information relating to the employment land requirement – explaining why the historic take-up figure has been corrected to exclude sui generis uses.

In considering the possible inclusion of a specific Policy for the Rural Economy - this has been incorporated in policy **GD4**: Development in the Countryside in Chapter 8.

Blackpool Airport and adjacent land is to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector, boosting the local economy. It is, therefore, considered appropriate to include reference to the Fylde Coast Energy Hub in the Local Plan.

The council considered Corner Hall Farm (as **site ref. 137**) for the purposes of employment and retail as part of compiling the Site Assessment Background Paper, October 2015. It was NOT included in the Local Plan for a number of reasons all of which are considered to remain valid.



Recommendations for change

- Delete paragraph **9.6** and the sub-heading:
Local Growth Accelerator Strategy
~~9.6 A Local Growth Accelerator Strategy for the Fylde Coast is being developed by Blackpool, Fylde and Wyre Economic Development Company to support the co-ordinated development of future employment across the sub-region. The Strategy will outline key areas for strategic growth within the Fylde Coast sub-regional economy that will enable focused investment to realise opportunities.~~
- Amend paragraph **9.8** to read: Blackpool, Fylde and Wyre Economic Development Company, is owned by the four Fylde Coast Authorities (Blackpool, Fylde and Wyre), together with Lancashire County Council, with a board of directors from the public and private sectors. ~~The Economic Development Company (EDC) is investigating the creation of an energy hub on the Fylde Coast, building on 80 existing businesses within the energy sector, as well as the potential exploration for shale gas, to generate a cluster of energy based companies and amenities throughout the area. As part of this initiative, the EDC is carrying out the initial planning of an energy logistics park, close to Blackpool Airport, to support energy businesses on the Fylde Coast. The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. The application for Enterprise Zone status at Blackpool Airport was co-ordinated by the EDC. The Enterprise Zone will become operational from 1st April 2016 and continue until 2037. The Blackpool Enterprise Zone will become a centre of excellence for the energy sector, with plans for a new Energy HQ, a dedicated new training facility to be developed by Blackpool and Fylde College. Backed by £6.2 million Growth Deal funding, it aims to provide job-ready students in engineering and advanced technology. Planning permission has been granted for the erection of a two storey college building at the site of the former airport terminal building. This development will support energy businesses on the Fylde Coast.~~
- The Publication Version Local Plan will be drafted to include a new policy (policy number **EC4**), regarding Blackpool Airport Enterprise Zone, in Chapter 9,

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 9 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the sub-heading 'Employment Land Provision' to read: 'Overall Provision of Employment Land.'

Policy EC1: Overall Provision of Employment Land and Existing Employment Sites

Number of representations:

Comment	Support	Object	Total
11	1	9	21 ⁴

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- Blackpool Council
- Kirkham Town Council
- Bryning with Warton Parish Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Treales Roseacre and Wharles Parish Council
- CPRE - Fylde District
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Landowner
- 2 developers
- 4 Residents

What you said

*Highways England noted that this policy has been significantly amended since the previous draft. Overall, there has been an increase in employment land of 7.3ha, however this is consistent with the amendment to Policy **DLF1**. The overall distribution has also changed, including the following site amendments:*

E4 - Land West of Fleetwood Road, Wesham (4ha mixed use) removed

MUS1 formerly **M1** - Land East of Cropper Road, Blackpool Periphery (11ha mixed use) reduced by 4.5ha

M3 - Land North of Blackpool Road, Kirkham or locally known as 'Kirkham Triangle' – (9ha mixed use) removed

In addition a number of existing employment sites have now been specified in the policy. It was previously identified that a suitable evidence base was needed in order to consider the

implications of such new development on the safe and efficient operation of the SRN; and that appropriate measures are identified to support the economic growth. Highways England, in September, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report'. It is not clear if any further evidence has been developed, beyond that initial assessment, which would enable Highways England to make further comments on the Plan and its influences on the safe and efficient operation of the SRN. As stated in section 4.2 of the report, it 'intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions'. As such, it is considered that there is still a need to follow the 'Next Steps' presented in Figure 4.1 of the report in order to move forward.

BAE Systems Real Estate Solutions supported the policy in respect of 'Existing Employment Sites'. However, it would be useful if the plan would set out the process for reviewing the employment land supply to ascertain when it can be demonstrated that there is 'no reasonable prospect of the site being used for employment purposes'.

BAE Systems Real Estate Solutions objected to the fact that the RPO does not include the Policies Map that may show the changes to the boundaries of the existing employment sites. In this case of Warton Aerodrome the former GEC Marconi factory site which was included within the employment area is currently being developed for housing. It should therefore be removed from the employment area.

Blackpool Council noted that paragraph 9.12 sets out that 14 Ha of employment land to meet Blackpool's employment land requirement up to 2027 will be provided within Fylde Borough. This provision is welcomed and strongly supported. They also stated that for clarity, it would be useful if the housing and employment policy allocation numbers could be shown on the Inset maps, as they are not currently identified.

Greenhalgh Parish Council wished to see changes to the plan to limit expansion of development into the countryside through a limit of land allocations to meet Blackpool's employment land aspirations for popular town edge Greenfield land over their available brown-field sites.

CPRE - Fylde District commented that they have seen no evidence of the need to provide 14 Ha of land in Fylde 'to meet Blackpool's need up to 2027'. The employment land requirement, including the needs of Blackpool, ought to be revised by reviewing findings of the Study and the implications of the Warton Enterprise Zone and the new Blackpool Airport Enterprise Zone.

Medlar with Wesham Town Council questioned why are Fylde expected to provide land for Blackpool when there appears to be available previously developed land which could be used?

A resident objected about the amount of land allocated for employment which they say is inflated to accommodate the desires of Blackpool for greenfield sites adjacent to Junction 4.

It is evident that brown-field sites within Blackpool can be made available as part of their need for the redevelopment of poor quality central areas and this would provide a more sustainable solution for both authorities. Blackpool's needs should be challenged rather than merely accepted. The large quantity of surplus land to be freed at the BAE plant at Warton should be taken into account, thereby saving significant areas of greenfield land.

Bryning with Warton Parish Council; CPRE - Fylde District; and a resident all made duplicate comments here and at paragraph 9.9. The each expressed concern at the methodology used in the calculation of the needs of the Borough reliant on the Fylde Employment Land and Premises study 2012 and believe the requirement for new employment land in Fylde is overstated.

Medlar with Wesham Town Council questioned why Fylde requires an extra 17.3Ha compared with the original calculation of Fylde's needs in the Preferred Option document?

Newton with Clifton Parish Council had doubts relating to the employment land calculations. It is understood that Fylde is smaller than both Blackpool and Wyre and yet appears to have twice the employment land in its Local Plan as both Blackpool and Wyre combined. Again members consider that this is aspirational rather than what is actually needed. If there are errors in Employment Land Policy then the Local Plan is unsound.

Historical land take up information should be used as a base and any identified over-supply of employment land could be released as and when considered appropriate for housing. More attention should be given to the two Enterprise Zones in Fylde which should provide high technology employment. The Local Plan does not evidence that land is released when businesses move on from existing sites to new locations and consequently free up their former sites for potential re-use by new businesses.

Fylde seems to have only counted newly deployed land and does not appear to have subtracted land released from use. There does not seem to be any recognition that working practice has changed dramatically in recent years i.e. home working, development in technology and c. As indicated previously large industries which underpinned employment opportunities in the Fylde have downsized considerably and land is still available for employment use on all those sites. Council welcomes the fact that employment figures in Fylde may be going up but also recognise that the land needed to accommodate the increased number of employees is being reduced. It does not necessarily follow that increased employment needs more housing land. Members are mindful of the fact that the ambitious employment land calculations correlates with a requirement for an increased allocation of housing land to provide homes for workers. In turn this could attract more "New Homes Bonus" that may well assist the Fylde Borough Council budget process but members keenly believe that only material planning considerations should be used that properly reflect the demographic requirements of Fylde.

Kirkham Town Council believed the allocated employment land calculations have been inflated to double the actual need derived from historic land take up. This allocated land should be given over to housing to reduce the need to build on green space. The inflated amount of Employment Land in the policy could undermine the Local Plan.

There has been no consideration given to Employment land becoming vacant only the need for new employment development. Fylde must deduct employment land that will become vacant.

Large manufacturing industries have reduced drastically on the Fylde which demanded much more employment land than technology based industry and the plan should reflect this reduction in need. Consideration should also be given to new working practices such as working from home.

Our neighbouring Councils Wyre and Blackpool have jointly identified half the amount of Employment land than Fylde yet are both much larger boroughs with higher populations. Why would Fylde identify such huge amounts of employment land if not to inflate the housing numbers and increase the amount of "New Homes Bonus."

One resident objected to paragraph 9.12 by stating one stupid number added to another stupid number. They also object to EC1 stating this policy is based on the wrong numbers.

Two residents have submitted comments similar to those of Kirkham Town Council – adding that Fylde, which is smaller than both Blackpool and Wyre, appears to have twice as much employment land in its Plan as both Blackpool and Wyre together. The amount of land in the Plan is considered to be aspirational rather than what is actually needed. Employment in Fylde may be going up but the land needed to accommodate the increased number of employees is going down, increases in employment does not need more land

Treales Roseacre and Wharles Parish Council commented regarding land at Local Enterprise Zone sites at Warton and Blackpool which were duplicated here. CPRE - Fylde District, Medlar with Wesham Town Council also made comments about land in the Enterprise Zone the as contributing to part of the Borough's employment land requirement.

The Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs. However they would like to see the development work being done by local workers to provide income to local people and keep the money in the local economy.

A developer objected to the allocation of 0.9ha of land at Dock Road, Lytham (ES2) for employment uses. The reasons for which are stated under policy SL1 in Chapter 7.

Another developer objected to emerging Local Plan policy EC1 (site ref. ES1) and the proposed retention of the Class B employment allocation of the Queensway site. In accordance with Framework paragraph 22, it is their view that there has been no robust assessment by the LPA (via its appointed sub-consultants) of the continued appropriateness of the employment allocation or consideration of alternative use for the site. The discounting of residential use of the site (site ref. SA75) in the Sites Assessments Background Paper and the ultimate recommendation to maintain the employment allocation does not in any way have regard to the following:

- *Marketing; Viability; Infrastructure; Blackpool Airport EZ designation; and ELPS Robustness.*
- *A detailed commentary is provided for each of the above and they recommend the site should be allocated for Class C3 residential development and designated as strategic location for development in the Local Plan.*

It should be noted that this representation also extends onto adjacent lands which are designated as Green Belt.

Council response

Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

The council welcomes Blackpool Council's support. The Local Plan Policies Map produced for the Publication Version will include relevant site references.

In response to the various comment about providing Blackpool's employment land, the commitment to provide 14 hectares of employment land to help meet Blackpool's requirement up to 2027 was agreed under the Duty to Co-operate. The Fylde Coast Memorandum of Understanding includes a commitment to agree the sub-regional employment land requirement.

The Fylde Sub Region Employment Land Review: Summary Statement 2010 explains the consequences of Blackpool's tight knit boundary and demonstrable lack of future development land, meaning opportunities for further employment expansion within the Borough are extremely limited.

The formal request from Blackpool Council to Fylde Council to possibly consider providing this quantum of land was made in response to Fylde Local Plan Issues and Options Consultation. "8.2 Blackpool Council would welcome reference to the potential of land at Whyndyke Farm for employment use as part of a mixed use development. The Blackpool Local Plan Part 1: Core Strategy 'Revised Preferred Option' identifies an employment land requirement of 35 to 40 ha up to 2027. As only around 25 Ha can be accommodated within Blackpool, the Council would welcome discussions with Fylde Council on how Whitehills / Junction 4 might address this shortfall." (October 2012, Fylde Local Plan to 2030: Issues and Options consultation, Statement of Consultation – Part 2: Summary of Comments Received and Council's Response).

The Blackpool Local Plan Part 1: Core Strategy 2012-2027 was adopted in January 2016. As part of its preparation Blackpool Local Plan Part 1: Core Strategy, the Planning Inspector's Report (November 2015) states the following "As a result of the joint working Fylde Borough

has formally agreed to seek to accommodate around 14 Ha of land for employment purposes, which is identified as necessary to meet Blackpool's requirements but which cannot be accommodated in the Borough."

The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of S106 when planning permission is granted. It is not something the council would seek to influence through Local Plan policy. This is addressed under **Appendix 8**.

The process for reviewing the employment land supply is set out in Local Plan policy **GD8**. Plan 8 in the RPO shows the former GEC Marconi factory site as a housing commitment with planning permission.

The comments and objections relating to the employment land requirement are addressed above in the context of paragraphs **9.9-9.12**.

Comments regarding land at Local Enterprise Zone sites at Warton and Blackpool are addressed under policy **EC2**.

The comments and objections relating to Dock Road, Lytham (site: **ES2**) are addressed under policy **SL1** in Chapter 7.

It is recommended that the Queensway site: **ES1** be retained as a Class B employment site. The allocation and protection of land for employment land is long term - for the plan period up to 2032. This allocation is located immediately adjacent to an established industrial estate which the developer contesting the allocation of site **ES1** acknowledges is 'low grade' employment uses and is in close proximity to the main runway of Blackpool Airport. Future residential amenity on this site is therefore questionable and the continued allocation of employment land is deemed to be more appropriate in terms of possible future expansion of the existing industrial estate. The comments and objections relating to Green Belt are addressed under policy **GD2**.

Recommendations for change

- Publication Version Local Plan Policies to include relevant site references.
- Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

Policy EC2: Lancashire AEM Enterprise Zone, at BAE Systems, Warton

Number of representations:

Comment	Support	Object	Total
6	1	1	8

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- Lancashire County Council
- Bryning with Warton Parish Council
- Treales Roseacre and Wharles Parish Council
- CPRE - Fylde District
- 1 Landowner
- 1 Resident

What you said

Highways England commented that this is a new policy which supports the designation of the Lancashire Advanced Engineering and Manufacturing Enterprise Zone at BAE Systems in Warton. It identifies that a Local Development Order has been produced for the site along with a Masterplan to drive the overall delivery of the Enterprise Zone. This policy does not in itself allocate any development within the Enterprise Zone or supporting infrastructure improvements although it is noted within paragraph 9.24 of the supporting text that some local junction improvements will be required to support its delivery and that once completed the Preston Western Distributor Road and new junction 2 onto the M55 will improve connectivity between the two parts of the Enterprise Zone at Warton and Samlesbury.

BAE Systems Real Estate Solutions made several comments as follows:

- **9.24** *The third sentence should be re-worded as the junction on Lytham Road is already in place.*
- *They support the general thrust of policy EC2 but consider that it does not provide the flexible framework that the plan seeks to provide at Paragraph 2.46.*
- *There is a conflict between this policy which seeks the development of employment associated with the EZ and the aspiration for a local retail centre on BAE Systems land which will be within the EZ. This needs to be resolved.*
- *Criteria (b) should be labelled Local Development Orders.*

- *The policy should refer to the rationale for the LDOs in providing a simplified planning regime and wider permitted development rights.*

Lancashire County Council commented that this policy must align with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.

Bryning with Warton Parish Council, Treales Roseacre and Wharles Parish Council, CPRE - Fylde District and a resident suggested this site should be recognised as contributing to part of the Borough's employment land requirement.

Treales Roseacre and Wharles Parish Council specifically commented that the land at Local Enterprise Zone sites at Warton and Blackpool should be identified as additional employment land so that the total strategic opportunity for employment is shown.

The prospective or actual change in employment by the BAE Systems Real Estate Solutions and Balfour Beatty should be addressed directly within the context of the strategies of these organisations. FBC can engage with each organisation to encourage them to retain and grow their employment activities in the area in a sustainable way.

The policy would be more meaningful if the jobs targeted at each site were included, as these would have been used in the justification for the LEZ status to be granted. This is important, so that adequate resources are provisioned to support the growth objective.

They also commented that there is no reference to the Blackpool Airport LEZ.

CPRE - Fylde District made the following specific comments:

The AECOM/BE Employment Land and Premises Study excluded the Warton Enterprise Zone supplying new employment land because 'it is a planned re-use of an established employment allocation'. But this fails to allow for the Warton Enterprise Zone facilitating re-use of a significant part of the BAE Systems site, with ambition for a large net gain of 'jobs/Ha' by replacements for BAE job losses and jobs from new Enterprise Zone tenants.

The three areas of the Warton Enterprise Zone total 75 Ha. The north side Phase 1 currently offers 8.5 Ha. The south west and east areas outside the BAE airfield core, although designated by Fylde for employment, currently represent quite a low jobs/Ha density. Consequently, some of this total Enterprise Zone land should be counted as an allocation of 'new' employment land at Warton within the Local Plan period.

The declared aim of the Zone is to 'support genuine additional growth and new jobs to counteract the loss of employment by BAE Systems'. (Local Development Order, Reference 10). But this additional jobs growth does not need the Council to allocate any additional employment land elsewhere. And these new jobs would contribute to employment needs of Blackpool and the Fylde Coast Sub-region, as BAE Systems and its predecessors have always done.

The Zone (currently) provides incentives only for new jobs and only in the advanced engineering and manufacturing sectors. However, employment outside the scope of the

Zone is not precluded by the LDO. Hence the AECOM/BE Study acknowledges 'that there may be exceptional circumstances where local occupier relocation or expansion could be appropriate – though they may not qualify for the Zone benefits'.

A landowner welcomed the Council's support for the delivery of the Lancashire Enterprise Zone and its associated Local Development Order and Phase 1 Masterplan, which is currently being implemented. They go on to comment that the Enterprise Zone represents a significant opportunity for Warton in terms of job creation and economic gain. It is therefore necessary to plan accordingly in terms of housing opportunities and appropriate infrastructure. The proposed housing requirement for Warton fails to do this and will need to be increased significantly to truly support the Enterprise Zone. Additional housing development will also help to fund the additional infrastructure required in Warton, through developer contributions towards highways, public realm and education.

Council response

The council notes Highways England's comments.

The council will amend the third sentence of paragraph **9.24** to reflect the fact that the new junction on Lytham Road is complete.

The council will amend paragraph **9.21** to refer to the 2015 LDO.

The council considers that policy **EC2** is appropriate to support the specialised activity at BAE Systems, Warton. The flexible framework referred to at paragraph **2.46** relates to the Local Plan as a whole, not policy **EC2** specifically. The flexibility which is sought by BAE Systems under policy **EC2** could be brought about by way of other material considerations through the planning application process. The LDO does not preclude other development types being proposed or permitted in the EZ, it just means that development falling outside of the specific advanced engineering and manufacturing Standard Industrial Classification (SIC) Codes require the submission of a planning application.

In respect of the proposed local service centre at Warton, paragraph **6.19** states that the proposed local service centre is to be on BAE Systems land. As referred to under policies **SL3** and **EC4**, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

Criterion b) will be amended.

A new paragraph will be inserted after **9.22** which sets out the rationale for the LDOs in providing a simplified planning regime; wider permitted development rights; and the expected job creation in the Enterprise Zone.

The landowner's support is welcomed.

In response to CPRE – Fylde District it is not considered appropriate for the Warton Enterprise Zone site to be recognised as contributing to part of the Borough's employment

land requirement. The LDO authorises development falling within specific Standard Industrial Classification (SIC) Codes, as far as it relates to advanced engineering and manufacturing.

In respect of land at the Blackpool Airport Enterprise Zone it will be targeting a number of key sectors to attract new investment and employment, including the civil aerospace sector, food and drink manufacture, the energy sector and digital and creative sectors, although no appropriate user would be excluded. 5.0 Hectares of land at has been allocated at Blackpool Airport (site **ES5**) has been identified under policy **EC1** for B1(a), B1 (b), B1 (c), B2, B8 uses.

The council will investigate increasing the potential employment land allocations at Blackpool Airport following the ratification of the Enterprise Zone on 1st April 2016. The Enterprise Zone will become operational from 1st April 2016 and continue until 2037.

The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone – see new draft policy **EC4** in the Additional textual changes box below.

The comments relating to the council encouraging BAE Systems Real Estate Solutions and Balfour Beatty to retain and grow their employment activities forms part of the on-going role of the council's Economic Development Service.

Recommendations for change

- The Publication Version Local Plan will be drafted to include a new policy (policy number **EC4**), regarding Blackpool Airport Enterprise Zone in Chapter 9.
- Amend paragraph **9.21** to read: 'The Council, ~~LCC and BAE Systems~~ have prepared a Local Development Order (LDO) for Phase 1 of the Enterprise Zone. It was adopted in 2012 and lapsed in October 2015. The 2015 LDO is, in effect, an extension of the previous Order with amendments to reflect the 2014 Masterplan, to increase the period of operation for a further nine years and take account of updated legislation. ~~The LDO will expire three years from the date of adoption. The future of the LDO – Part 1 will be assessed after its initial three years.~~
- Insert new paragraph after **9.22** (and renumber all subsequent paragraphs) to read: 'The LDO authorises development falling within specific Standard Industrial Classification (SIC) Codes, as far as it relates to advanced engineering and manufacturing. It has a number of conditions which need to be discharged by the Local Planning Authority. Development falling outside of these SICs therefore require the submission of a planning application. Building on the resurgence of advanced manufacturing and Government's re-commitment to positioning the UK as a leading force in global advanced engineering and manufacturing arena, the Lancashire Enterprise Zone will be become a national focal point for the sector, help mitigate the impact of the potential job losses at the Warton Unit and the

wider impact this will have on the Lancashire economy.’ The Enterprise Zone will aim to provide the opportunity to create 4,000 to 6,000 high value jobs in the long term and 1,200 jobs in the short to medium term.

- Amend criterion b) of Policy **EC2** to read: Local Development Orders.
- Amend third sentence of paragraph **9.24** to read: Whilst the site is well-located, its accessibility and connectivity ~~will need to~~ has been strengthened through the ~~delivery of the Enterprise Zone, with~~ completion of a new highway junction ~~completed~~ on Lytham Road to access the site and support its delivery.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 9 and to ensure a new policy is included in the Publication version on Blackpool Airport Enterprise Zone.

Additional textual changes

- Re-number policy **EC2** to become policy **EC3** in the Publication version: ‘Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems, Warton’.
- Amend the first sentence of criterion b) in policy **EC2** to read: ‘The council ... has produced and reviewed a Local Development Order - Part 1’
- Add a new policy: ‘**Policy EC4 - Blackpool Airport Enterprise Zone**
a) The Blackpool Airport Enterprise Zone
The boundary of the Enterprise Zone is identified on the Policies Map. The designation of the Blackpool Airport Enterprise Zone will help create more businesses, jobs and attract international investment, with positive benefits across the wider economic area. Fylde Council supports the sustainable development of Blackpool Airport, including working to explore the potential to develop commercial aeronautical activity. The Enterprise Zone will help improve the local economy and also increase the contribution to national growth.
b) Enabling Development
Alternative uses, such as retail, employment and leisure may be appropriate where it can be demonstrated that they are essential to help the delivery of aviation uses on this site. The scale of any alternative enabling development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the maintenance of the primary aviation function of the site. Any proposed main town centre uses must satisfy the sequential and impact tests set out in the National Planning Policy Framework and the relevant policies in this Local Plan.
c) Local Development Order

The council supports the delivery of the Blackpool Airport Enterprise Zone and will produce a Local Development Order to aid the delivery process. A Masterplan will also be produced and be adopted, which will form a key part of the overall delivery of the Enterprise Zone, together with an agreed programme of implementation in accordance with the Masterplan. The key purpose of the Masterplan will be to establish the development and design framework for the site and ensure it is in accordance with the relevant parameters within the Local Development Order.'

- Add supporting text to accompany policy on Blackpool Airport Enterprise Zone: 'Blackpool Airport was proposed as an Enterprise Zone in March 2015 and following the submission of a business case it was designated in April 2016. The Enterprise Zone fronts Squires Gate Lane and currently comprises a mix of airport hangars, long stay surface car parking and sports pitches. Development of an Enterprise Zone at Blackpool Airport has the potential to provide opportunities for retail, employment and leisure uses at the airport and would also provide jobs close to where people live. Blackpool Airport is previously developed land, which is within walking distance of Squires Gate Railway Station and there is good access by bus into Blackpool and Lytham and St Annes. New or improved signalised junction and public transport facilities, including associated highway infrastructure such as cycling and pedestrian facilities, will be required if the site is to meet its full potential. In terms of cycling, Lancashire County Council seeks a cycle path on Squires Gate Lane, along with toucan crossings.'

Policy EC3: Employment Opportunities

Number of representations:

Comment	Support	Object	Total
2	0	2	4

Representations received from:

- Highways England
- Treales Roseacre and Wharles Parish Council
- 1 Landowner
- 1 Action Group

What you said

Highways England noted that this is a new policy which applies to the development of employment uses on land identified in policy **EC1** along with any other location within the Borough to protect employment land for viable employment uses. It sets a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use and supports the sustainable growth and expansion of all businesses provided proposals are compliant with other policies in the Plan. Consequently, the policy should not present any particular concern for Highways England.

Treales Roseacre and Wharles Parish Council commented that Shale Gas development in the rural areas is inconsistent with paragraph **9.28**.

A landowner objected to this policy as it is too vague. For reasons already highlighted in the consultation response to policy **GD8** there are concerns at the obstacles being placed to the redevelopment of employment land, which conflict with the objectives of the Framework. To compound this by suggesting that any type of use could be treated by the council as being an employment use is entirely unjustified. It is also too vague and only B1, B2 and B8 uses should fall to be considered against general employment related policies.

An Action Group has questioned why Wrea Green is being regarded as sustainable despite the Appeal Inspector's evaluation?

Council response

The council notes Highways England's and Treales Roseacre and Wharles Parish Council's comments.

Paragraph **9.28** refers taking a positive approach to sustainable new development in the context of paragraph 28 of the Framework. Policy **S1** sets out the proposed settlement hierarchy as the basis for sustainable communities.

The landowner's comments are addressed under policy **GD8** in Chapter 8.

Recommendations for change

- Re-number policy **EC3**: Employment Opportunities to become policy **EC2** in the Publication version of the Local Plan.

Policy EC4: Vibrant Town, District and Local Centres

Number of representations:

Comment	Support	Object	Total
---------	---------	--------	-------

2	1	5	8 ⁵
---	---	---	----------------

Representations received from:

- BAE Systems Real Estate Solutions
- Blackpool Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- 1 Action Group
- 2 residents

What you said

BAE Systems Real Estate Solutions commented that there is no map at the back of the plan to show the location of the proposed local centre in Warton. They also stated that the policy should also refer to the established and identified local centre need within the adopted Local Plan that remains unfulfilled.

*Blackpool Council - The RPO introduces a local impact assessment threshold of 750 square metres for use when assessing applications for retail, leisure and office development outside of town centres, which is welcomed. Out-of-centre retailing on the Fylde-Blackpool Periphery or in St Annes/Lytham could impact upon Blackpool Town Centre and other designated Blackpool centres, so it would be useful if applicants in Fylde are made aware that the impacts of out-of-centre retailing often cross Borough boundaries. It is suggested that wording is included in policy **EC4** (Vibrant Town, District and Local Centres) and its supporting text to ensure that applicants take account of Blackpool and the wider area when undertaking sequential testing or impact assessments, when appropriate.*

It is suggested that the proposed local centre at Whitehills should be more centrally located with respect to development in the area and include plans for radial pedestrian and cycling linkages to encourage travel by sustainable transport modes. In addition provision needs to be made to ensure regular buses to Blackpool, Preston and Lytham St Annes serve the centre of the development and operate on a commercial footing.

Greenhalgh Parish Council and a resident wished to see changes to the plan to limit expansion of development into the countryside through strong policies which resist out of town retail and leisure development in order to protect the vitality of the centres of St Annes, Lytham and Kirkham.

Medlar with Wesham Town Council stated that Wesham, has its own distinctive local centre. They object to the fact that it has not been identified as such. Wesham is NOT part of Kirkham Town Centre.

An Action Group questioned item 3 - SO why does Freckleton receive SO little housing? Anything to do with chairmanship of the DMC? The also stated that in relation to paragraph 9.44 parking in Lytham is a major and costly issue.

Broadly we support the draft local plan; however the Council's failure to produce a local plan in a timely way has led to development or applications for development which are neither required nor desired.

A resident commented that whilst accepting that Kirkham is not a tourist destination unlike Lytham and St Annes, we feel that further work could be done to promote the town as a visitor centre. The work done on some shop fronts and pavements have enhanced the visual aspect of the town but further incentives to encourage good quality retail would make a huge difference in keeping people of the town and visitors spending their money on the highstreet. The market square in particular looks shabby and some further street scene work would be beneficial to this very historic quarter of the town.

Council response

In respect of the proposed local service centre at Warton, paragraph 6.19 states that the proposed local service centre is to be on BAE Systems land. As referred to under policy SL3, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

The council notes the comments relating to the proposed local centre at Whitehills. The starting point for planning the Fylde-Blackpool Periphery Strategic Location for Development is policy M1. Criterion a) states that the Strategic Locations for Development should be looked at as a whole. The proposed location on Plan 1 is indicative. Notwithstanding this a significant amount of development has either been approved or implemented in this location, so the scope for alternative locations can only be explored to some limited extent. The provision of bus services is addressed in the accompanying IDP. The council will illustrate the location of the proposed local centre at Whitehills on the Publication Version **Policies Map**.

Blackpool Council's support for the local impact assessment threshold is welcomed. The policy will be amended to the effect that when undertaking sequential testing for retail, leisure and office development, regard should be had to their likely impact upon other centres, including those outside of Fylde.

The last section of the policy and supporting text at paragraph 9.51 states that proposed development in 'Out of Centre' and 'Edge of Centre' locations will be considered in line with the framework. This is considered to be a robust policy approach.

Wesham has been excluded from the list of Local Centres listed in policy EC4 as the services and facilities in Wesham are dispersed and there is no clear nucleus to the centre. The council does not consider there to be a distinctive or identifiable boundary for a centre.

It is not considered appropriate to refer to the established and identified local centre at Warton. This plan is about place making for the future. Paragraph **7.51** acknowledges that there is currently a lack of facilities and services.

In responding to the Action Group - The council has established the retail hierarchy of centres based upon the level of services and facilities which it is proposed to offer at the end of the Local Plan period. This is not a reflection of the level of growth which is proposed in the Local Plan. The settlement hierarchy identifies Freckleton as a Local Service Centre, whereby development will be by way of infilling and rounding-off. The comments relating to parking are noted.

The resident's comments about Kirkham town centre have been passed to the council's Regeneration Team as they are relevant to future town centre improvement projects.

Recommendations for change

- After paragraph 'Development outside of town centres' in policy **EC4** add: 'When undertaking a sequential test, or retail impact assessment, it will be necessary to have regard to likely impact upon other centres, including those outside of Fylde.'
- Amend last paragraph of policy **EC4** to read: 'Proposals for retail, leisure and office development in 'edge of centre' or 'out-of-centre' locations will be considered in line with the Framework, bearing in mind the impacts on existing centres.'

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy, together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Re-number policy **EC4** to become policy **EC5** in the Publication version.
- Amend the first sentence of the policy to read: 'The town, district and local centres; and primary and secondary frontages are defined on the Policies Maps which accompanies at the back of this plan.'
- Add the following sentence at the end of the paragraph following criteria 1) to 4)

under 'Local Centres': 'The Local Centres at Warton and Whitehills should include pedestrian and cycling linkages and access to public transport.'

Policy EC5: Leisure, Culture and Tourism Development

Number of representations:

Comment	Support	Object	Total
1	2	2	5

Representations received from:

- Highways England
- Canal and River Trust (formerly British Waterways)
- BAE Systems Real Estate Solutions
- 1 Action Group
- 1 resident

What you said

Highways England noted that the policy has been significantly amended, however none of the amendments represent any particular concern for Highway's England and as such the previous comments remain applicable, which were as follows:

The Agency has no particular comment, but is generally supportive of locating leisure, cultural and tourism development in St Anne's and Lytham, where their scale and cumulative impact is appropriate to the location, and the Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.

The Canal and River Trust (formerly British Waterways) welcomed recognition of the potential of the Lancaster Canal to contribute to rural tourism.

BAE Systems Real Estate Solutions note the promotion of the Ribble Coast and Wetlands Regional Park as a leisure and tourism facility within the Borough. However, as part of this Park is adjacent to the Warton Aerodrome, BAE Systems consider the plan needs to include

suitable safeguards to the operational requirements and communication systems at the Aerodrome from any developments associated within the Park.

An Action Group questioned how mutual benefits referred to in paragraph 9.61 are to be achieved.

A resident commented that paragraph 9.71 that this is a visionary point with no plan or schedule behind it. The point is a target only and has no plan, no structure, no aim behind it. If this is a serious point then there needs to be more depth, timescale and definition within it.

Council response

The council welcomes the support of Highways England and the Canal and River Trust (formerly British Waterways).

The council will amend paragraph 9.69 to take account of the operational requirements and communication systems at Warton Aerodrome.

In respect of paragraph 9.61 it is the variety of tourism and leisure destination types on offer which will cater for different requirements, tastes and budgets. Attracting visitors to both Fylde and Blackpool resorts brings benefits to the wider area.

In response to the resident's comments, all details are set-out comprehensively in the associated Infrastructure Delivery Plan.

Recommendations for change

- Amend paragraph 9.69 to read: '...assets. Any development associated with developing the Ribble Coast and Wetlands Regional Park will be have regard to safeguarding the operational requirements and communication systems at Warton Aerodrome.'

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy; together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan; and the inclusion of additional text to clarify the location of the Sea Front Area which will appear in the Publication version of the Local Plan.

Additional textual changes

- Re-number policy **EC5** to become policy **EC6** in the Publication version.
- Amend criterion e) in policy **EC5** to read: ‘... within town centres in Key Service Centres and in Local Service Centres.
- Add two new criteria (i.e. j and k) to the policy: ‘Encouraging the provision of training in leisure, culture or tourism development’ and ‘Project specific Habitats Regulations Assessments (HRAs) will be required for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no significant effect upon European Sites before the tourism and / or coastal defence developments can be granted consent.’
- Amend the policy to read: ‘The Island Sea Front Area at St Annes’

Policy EC6: Tourism Accommodation

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to policy **EC6**.

Recommendations for change

- None

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy; together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Re-number policy **EC6** to become policy **EC7** in the Publication version.
- Amend the first sentence of the policy to read: '... as defined on the ~~Inset~~ Policies Map, provided that proposals
- Add a third criterion to the policy: '(iii) do not adversely affect the nature conservation assets of the coastline and protected species, including the Ribble and Alt Estuaries SPA / Ramsar site.'

DRAFT

Chapter 10 Provision of Homes in Fylde

Chapter 10: Housing Land Requirement and Supply

Number of representations:			
Comment	Support	Object	Total
3	0	5	8

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- 1 Landowner
- 1 Action Group
- 1 Resident

What you said

Paragraphs 10.6 – 10.14

Treales, Roseacre and Wharles Parish Council stated that it is not clear how the Local Enterprise Zone job targets, Warton and Salmesbury (6000 direct, 5000-7000 indirect) and Blackpool 3000 are reconciled with the infrastructure required. The Scenarios in the SHMA should consider shale gas development. The assumptions underpinning the national government targets should be challenged and updated scenarios created.

Bryning with Warton Parish Council (10.13) found that the methodology and rationale drawn to justify the level of housing required in the borough for the Local Plan are highly questionable and flawed, the figure is way too high (see H1 Housing Figure Too High).

A landowner stated that with respect to paragraphs 10.6 -10.10, the Local Plan is not providing for adequate housing in line with the Objectively Assessed Need, additional housing will be required, see response to H1 -Housing Figure Too Low.

An Action Group objected, questioning what action is to be taken to achieve this? Fylde has a higher proportion of empty homes than the national figures and enough to support a 1.5 year supply, therefore making a five year supply fulfilled (10.3), they also question why more specialist accommodation for the elderly hasn't been provided since 2011 in Wrea Green. Also consents approved will overwhelm services and infrastructure (10.4).

An Action Group wanted to see the full split of the housing figure by location, tenure and housing type (10.13), they also referred to the Housing Needs Survey 2012 for Wrea Green.

A resident objected stating that paragraph 10.9 is a very misleading statement the forecast was not on the basis of forecast job growth, it was based on a desired job growth scenario

which has not been supported by the studies, and that there has been selective use of the evidence (paragraph 10.10) Strategic Housing Market Assessment (SHMA) and Addendum 1. An Action Group objected questioning whether the forecasts in jobs growth should not come to some fruition before the homes are approved?

Council response

The Enterprise Zone job targets are aspirational and in the case of Warton, they are not currently being realised. The Enterprise Zone prospectus and the Local Development Order set out the infrastructure requirements for the Warton Enterprise Zone.

The impacts of shale gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre-exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.

The housing trajectory at **Appendix 2** does set out the location of new housing, and the SHMA and Addendums 1 and 2 do evidence the tenure and house type that are needed, however, government policy with respect to tenure and house type is changing, the Publication version of the plan will reflect the latest government policy and where up-to-date evidence on local housing need is available it will be used to inform decisions on planning applications.

The council has followed the instructions in the National Planning Practice Guidance (NPPG) and has considered the evidence (SHMA plus Addendums 1 and 2 and the Housing Requirement Paper) and selected the figure of 370 homes per annum, that is the role of the council as Local Planning Authority.

With respect to the Action Group's objection, the council cannot assume that all empty homes will come back into the supply within 5 years, this would be unrealistic. In the Five Year Supply calculation an allowance is made for 10 long term empty homes per annum re-entering the market. The objections to planning consents are noted.

The housing requirement figure is dealt with under policy **H1** in Chapter 10.

The forecasts in job growth do not have to come to fruition before housing is approved, the NPPG makes it clear that the provision of jobs and homes should be considered in tandem.

Recommendations for change

- None

The Five Year Housing Supply

Number of representations:

Comment	Support	Object	Total
5	0	1	6

Representations received from:

- Home Builders Federation
- Blackpool Council - Planning
- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner
- 1 Developer
- 1 Resident

What you said

Paragraph 10.15

The Home Builders Federation welcomed the recognition that the council does not have a five year supply, it is paramount that the plan seeks to address this at the earliest opportunity. Proactive approach to delivery and inclusion of attractive sites are required, the cumulative impact of numerous policies are unlikely to ensure a five year supply at adoption.

Blackpool Council stated that a five year supply should be identified in the Publication Version of the plan. A lack of a five year supply will encourage developers to target additional sites in the Fylde Blackpool Periphery which will have implications for services and infrastructure in Blackpool and the Blackpool Housing Strategy. There is no set methodology for five year land supply calculations, Blackpool's method was found sound at examination, therefore it is suggested the following approaches should be taken at Fylde:

- *Removing the application of an additional 10% discount on all sites*
- *Dealing with the undersupply over the plan period, rather than within five years.*
- *Making an allowance for windfalls*
- *Also planning permission has recently been granted for 360 homes in Warton on land not currently included in the supply, this could be included and would boost the supply.*

The CPRE stated that it had demonstrated that with the methodology and assumptions being used by the council to satisfy the Framework rule, currently a five year housing supply

would be shown with a housing requirement of 328 homes per year. To be found sound the Publication version of the Local Plan must demonstrate a 5 Year Housing Supply.

A landowner stated that if the Local Plan cannot demonstrate an adequate supply to deliver the first five years of the plan period it is unsound, the council need to identify more housing land.

A developer asserted that the 20% buffer should be applied not only to the 5 year requirement but also the 735 backlog because this backlog is brought forward into this the first five years of the plan and is therefore part of the five year requirement. Secondly, they state that the council cannot meet its housing requirement in the first five years of the plan period, on this basis this element of the plan is considered to be unsound because it does not meet the test of being positively prepared or effective.

A resident stated that the housing requirement has been based on a selective assessment of the evidence (discarding historic trends), if it had a sensible number the council would have a five year land supply.

Council response

The council agrees that it does not currently have a five year supply of housing land. The council also accepts that this could encourage housebuilders to target additional sites for development. It should also be noted that the council will have a Five Year Land Supply at adoption of the Local Plan because the remaining allocations in the plan will then contribute to the five year calculation as supply. The Local Plan does contain four strategic sites which between them contain a significant number of sites, the majority of which have planning permission. These sites are being delivered with completions currently ongoing at all of the strategic locations.

With respect to Blackpool Council's comments in relation to the five year supply methodology, the 10% lapse (discount) rate is applied to all sites as a general allowance for sites not coming forward. The 10% is applied to the total existing and potential supply. The main benefit being that it avoids the need to go through all of the sites being considered, one by one at a Planning Inquiry, it is a generic approach which can be agreed by both parties and has been examined and supported by Inspectors' at Fylde Planning Inquiries (Section 78). This approach has also been supported elsewhere (outside Fylde) at Planning Inquiries involving the five year supply, as a reasonable approach. Blackpool's Five Year Supply methodology remains unchallenged by the development industry, Fylde's approach has been challenged and examined on numerous occasions. The resulting methodology has been accepted and supported by Planning Inspectors.

With respect to the issue of dealing with the undersupply over the plan period rather than within five years. The PPG states that Local Planning Authorities should aim to deal with any undersupply within the first five years of the plan where possible. Where this cannot be met in the first five years, local planning authorities will need to work with neighbouring Authorities under the Duty to Co-operate.

Blackpool Council has been allowed to deal with their backlog over the plan period. This approach has been supported by Blackpool's Inspector where the five year supply calculation has been related to the whole plan period and the examination of a Core Strategy. However, at Fylde it is clear from various Planning Inquiries involving the Five Year Supply Calculation, that because the country is now out of recession, the backlog cannot be attributed to the recession and should, therefore, be tackled over the first five years of the plan period.

A developer has objected to the plan and asserted that the backlog should be brought forward into five years of the plan and dealt with in the five year supply calculation. Fylde would not have an allowance for large windfalls because it has not had any allocations, therefore all large housing sites would be windfalls and there are no past completion rates from large windfall sites to project forward.

A windfall allowance for small sites is included in the trajectory for the Local Plan from Year 6 onwards, this is based on past completion rates on these sites (development in gardens is not included in line with the Framework). Year 1-5 includes small sites for 1-9 homes as commitments. This approach was agreed by the Inspector at the Blackfield End Farm Inquiry.

The council agrees that the Five Year Supply calculation should be updated to a base date of 31 March 2016, it will then include all the current commitments.

With respect to the two comments on the housing number (in relation to the five year supply) no evidence has been provided to support the selection of a lower housing requirement figure. The housing figure is dealt with at policy H1.

Recommendations for change

- The council will update its Five Year Housing calculation to a base date of 31st March 2016.

Housing Delivery and Allocations

Number of representations:

Comment	Support	Object	Total
0	1	7	8

Representations received from:

- Home Builders Federation

- 2 Landowners
- 1 Developer
- 1 Action Group

What you said

Paragraphs 10.16 – 10.19

The Home Builders Federation supported the plan identifying a greater supply of housing than the proposed housing requirement, the plan requirement should be and is identified as a minimum, it therefore stands to reason that the plan should seek to surpass this requirement, secondly a buffer will provide a balance against the inevitable under or none delivery from existing commitments or proposed allocations (paragraph 10.16).

Also the Home Builders Federation and a developer stated that the plan seeks to provide 390dpa, 20dpa greater than the proposed requirement. This provides a 5% buffer which is not considered sufficient. A buffer of 20% should be provided, due to poor past delivery. Given poor past delivery and the lack of a five year land supply the plan should not artificially constrain sites through a phasing mechanism (paragraph 10.17).

Two landowners stated that paragraph 10.17 acknowledges that the identified supply is only marginally higher than the proposed requirement and provides a small buffer of only 22 homes per annum, this is insufficient and the Local Plan requirement should be identified as a minimum to conform to Framework requirements. It stands to reason that the Local Plan should not simply seek to match or slightly exceed the requirement, but should proactively aim to clearly surpass it. An adequate buffer is needed to provide an adequate balance against the inevitable under or none delivery from some existing commitments and or proposed allocations.

An Action Group was very much in favour of the plan but did not agree with the overall housing need, the evidence is inconclusive and the final figures do not correlate with the data, they are also concerned that the plan will not be consistently implemented. What did the delivery of 250 homes per annum actually show – a housing shortage, how did this manifest itself? How many people are seeking homes (other than socially rented) who cannot find on? Also why was paragraph 10.19 not applied to planning application 15/0458.

Council response

The housing requirement will continue to be expressed as a minimum. Neither the NPPG nor the Framework state that the plan should surpass the requirement, expressing the figure as a minimum means that the requirement figure should be met.

The use of the word 'buffer' in paragraph 10.17 seems to have caused some confusion amongst respondents and it is therefore recommended that this wording is changed to a small amount of headroom above the housing requirement for the plan period. The extra 20 homes per year that the plan has the potential to supply, is completely separate to the 20% buffer which is added to the five year housing requirement (in effect bringing year 6 into the

requirement), which the council does in its five year housing supply calculation because it has been underachieving delivery.

The issue of phasing is responded to under General Comments on policy **H1**, see below.

The overall housing need is dealt with under responses to policy **H1**. The annual completion rates are analysed in more detail in the SHMA, detailed information of the households arising is contained in Addendum 2 to the SHMA.

With respect to the objections made by the Action Group the SHMA and Addendums 1 and 2, contain a great deal of information with respect to the numbers of households who will be seeking homes over the plan period.

Recommendations for change

- Delete the reference to buffer from paragraph **10.17** and replace it with: 'The supply provides a small amount of headroom above the housing requirement for the Plan period'.
- Amend the text in paragraph **10.17** and throughout the plan to read: 'a minimum of ~~7,700~~ 7,770 new homes'.

Additional recommendations for change

The following additional change is proposed to update the text of Chapter 10 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Replace all references in the Local Plan from 'flats' to 'apartments'.

Policy H1: Housing Delivery and the Allocation of Housing Land

Number of representations:

Comment	Support	Object	Total
16	2	16	33

Representations received from:

- Highways England
- The Home Builders Federation
- Blackpool Council - Planning
- Kirkham Town Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Greenhalgh with Thistleton Parish Council
- Bryning with Warton Parish Council
- Council for the Protection of Rural England (CPRE) - Fylde District
- 5 Landowners
- 2 Planning Consultants
- 5 Developers
- 1 Action Group
- 5 Residents

What you said

General Comments

Highways England commented that it is unclear whether the housing requirement figure is 370 homes per annum or 513, given that there is enough land in the plan to deliver 8,188 homes.

The Home Builders Federation and a planning consultant supported the monitoring of housing delivery however, if the plan is failing to deliver the council should also consider triggers for an early review. The council may wish to identify timescales for delivery through a trajectory but should not seek to stall sustainable and deliverable sites coming forward, this will prevent the council from having a five year supply.

The Home Builders Federation and a planning consultant objected to the artificial phasing of site release in Fylde. Prior to adoption of the plan the council will have already identified that the proposed allocations are sustainable and their development should not be artificially constrained.

Blackpool Council suggested that the housing requirement figure actually equates to 7,770 homes over the plan period, rather than 7,700 and this figure should be used to provide greater clarity, also it would be useful if the housing and employment policy allocation numbers could be shown on the inset maps as they are not currently identified.

Blackpool Council supported the rates of delivery set out in the Trajectory and state that realistic lead-in times and build out rates have already been considered as part of the assessment.

An Action Group requested the full split of these figures by location tenure and type, this is essential to proper planning. A total of 370 is insufficient to ensure the right homes are built

in the right place! Is the figure correct bearing in mind Keppie Massie's comments on over supply.

*A number of landowners objected to paragraph **10.22** which explains that the identified supply also includes an allowance of 680 homes from unallocated small sites and an anticipated windfall allowance (however, the figure in **Table 2** puts this at 937 homes). This adds to the risk of under delivery and further underlines the need to increase the planned requirement and provide an adequate buffer.*

A developer supported the fact that the housing requirement is not viewed as a minimum, another developer recommends that the housing requirement figure is identified as a net requirement, noting the recent Inspector's Report into Blackpool Council's Core Strategy which requested this modification.

*A further developer commented that criterion d) of policy **H1** seeks to constrain delivery through the references to phasing of housing in the Fylde, they also cross reference paragraph 2.30 and the definition of phasing in the Glossary (inconsistencies), a planning consultant also objects to artificial phasing and recommends that these delivery expectations are clearly noted as being indicative.*

Another developer went onto say that the phasing of sites should only be applied on account of constraints or infrastructure issues (such as utility or roads) which mean that the development cannot be realised now. A phasing strategy fails to accord with the presumption in favour of sustainable development.

Housing Number Too High

*This section included comments on policy **H1** and other comments on the Housing Number made via the supporting text in Chapter 10.*

*Bryning with Warton Parish Council in regards to paragraph **10.13** find that the methodology and rationale drawn to justify the level of housing required in the borough for the Local Plan are highly questionable and flawed, the figure is way too high.*

Greenhalgh with Thistleton Parish Council wished to see changes to the plan to limit expansion of development into the countryside through the setting of realistic rather than inspirational housing targets to meet the housing market level to date rather than 'catching up'.

Kirkham Town Council, Newton with Clifton Parish Council and a resident stated that the number is totally unachievable and should be reduced accordingly. Previously developed land and unused employment land should be used instead of greenfield. The future employment figure on which the housing number is based are inflated, future housing requirements should be based on historic fact. The consultants openly stated that they used standard models for comparing Fylde to other areas, the affordable housing figure is one tenth of the 420 stated, as the affordable number has been badly misjudged the policy should be adjusted to reflect this. Affordable housing has not met the 30% obligation, and

building numbers have had to be reduced, also there is a large housing development close to Fylde's border in Preston which would reduce Fylde's need.

Medlar with Wesham Town Council were of the opinion that the figure of 370 is too high because historically the actual delivery figure has been about 250, rarely exceeding this figure. The buffer of 20 should have already been included in the 370. Commitments should give a five year supply, developers have failed to deliver completions.

It is the opinion of the CPRE – Fylde District that the housing requirement figure of 370 homes per year is based on an objectively assessed need calculation based on unrealistic scenarios leading to an unreasonably high figure. CPRE – Fylde District agree with a number of caveats in the housing requirement paper suggesting the figure could be too high. From the starting point of the 2012 SNHP, and taking into account market signals reflected in the shortfall in take up and completions, CPRE – Fylde District has suggested the realistic achievable housing requirement for Fylde ought to be circa 250 homes/year.

Two residents objected to the housing number in particular the 140 homes proposed at Elswick.

A resident suggested that Fylde Council reduces the annual requirement figure to 300, in light of the inability of existing developers to build more per year, secondly Fylde Council will object to any future applications by developers until they have completed 50% of their existing commitments and this must include 50% of the social housing proposed by the application.

A further resident objected to the housing figure and states that Fylde should not be made to meet targets that are appropriate for South East England, Otherwise there will be empty homes, partially developed sites, destruction of quality farmland and loss of rural character. All areas of the borough should meet the target, Kirkham and Wesham is making a disproportionate contribution.

Another resident was concerned that the housing numbers will unnecessarily over provide the real growth needs, more agricultural land will be lost, more retired and economically inactive people will be attracted to the area. Otherwise, the area will attract in commuters with pressure on highways which is unsustainable.

Housing Number Too Low

A landowner stated that with respect to paragraphs 10.6 -10.10, the Local Plan is not providing for adequate housing in line with the Objectively Assessed Need, additional housing will be required. Another landowner, states that the proposed housing requirement of 7,700 does not ensure the council will make every effort to meet its identified Objectively Assessed Need and respond to wider opportunities for growth, it should therefore be increased.

A further landowner stated that 370 homes per annum is insufficient to meet development needs to 2032, it will not sustain nonstrategic locations for development and settlements

such as Staining. Delivery has been over estimated and there is over reliance on windfall sites. It will not meet the need for affordable housing. Development levels should be increased to allow for sites in larger Tier 1 Rural Settlements such as Staining to come forward.

Another landowner commented that there was an over-reliance on unidentified windfall sites, the planned housing requirement should be increased to provide an adequate buffer through a positive plan led approach. Another Landowner states that the buffer of 20 homes per annum is insufficient, it will only take one of the larger strategic sites to stall and the Council will not be meeting their five year housing land supply. On this basis it is considered that their site at Moss Side Lane Wrea Green should be allocated.

A planning consultant stated that 370dpa is an underestimate and does not represent a true Objectively Assessed Need, it should be increased to reflect recent projections, market signals, employment policy and natural change. The plan seeks to retain younger people, and promote industry, this will impact on the need for housing at Warton. The plan is unsound, the figure should be increased or there will be housing pressures and shortages.

A number of landowners plus a planning consultant stated that the upper end of the up-to-date SHMA Addendum 2 scenario outputs (based on the CLG 2012 - based household projections) justify a higher employment – led Objectively Assessed Need than the proposed housing requirement of 7,700 homes based on the population led Objectively Assessed Need which does not provide the scope to reduce the current rate of unemployment in Fylde. On this basis, regardless of historic delivery rates and in the absence of major constraints to meeting its Objectively Assessed Need, the council should plan for a higher requirement to enable economic objectives to be met. Also the Local Plan does not provide sufficient flexibility and built-in headroom (contingency) to maximise the prospect of delivery being frontloaded in the early years given the step change that is needed to reverse under delivery which has worsened over the first four years of the plan period.

The SHMA Addendum 2014, identified three employment led scenarios which range from 302 to 434 homes per annum, 370 would only fulfil the Experian projections under either the baseline or reduced unemployment sensitivity test. Blackpool's Inspector placed significant weight upon the Oxford Economic Projections, which would require a housing requirement of at least 411dpa in Fylde. To align the housing requirement with this strategy would require a net minimum of 400 dpa. It is clear that 370dpa is not sufficient to meet its Objectively Assessed Need of the area within its own boundaries. They go on to say that with regard to affordable housing needs the SHMA Addendum identifies an affordable housing need of 249 dpa, which equates to over two thirds of the housing requirement. They then go on to quote the Framework and the PPG which advises that an increase in total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes (ID2a-029). The PPG also states that the more significant the affordability constraints the larger the additional supply response should be. This evidence supports their position that the proposed housing requirement is too low and does not align with the economic strategy within the plan, nor will it meet the affordable housing needs of the area. Finally they comment that the SHMA is based on a period up to 2030, whereas the Local Plan is based on a plan period is up to 2032, there is therefore a need for additional evidence to

justify this extension and the further implications for the Council's housing needs and supply. They conclude by recommending that the housing requirement be increased to at least 400dpa (net).

A further planning consultant considered that the plan has underestimated the annual housing requirement by approximately 20% and that a figure of 440 to 450 dpa would be required to meet Fylde's economic growth aspirations and affordable housing obligations, as recommended in the 2014 SHMA Addendum 2. This gives a total supply of 11,088 – 11,340 homes, which represents an increase of up to 3,150 homes (38%) from the identified supply. An earlier version of the plan indicates Warton could support 1,160 homes, which is not considered unreasonable as it equates to just 15% of the 3,150 additional homes required.

A planning consultant stated that 370dpa was an underestimate and does not represent a true Objectively Assessed Need, it should be increased to reflect recent projections, market signals, employment policy and natural change. The plan seeks to retain younger people, and promote industry, this will impact on the need for housing at Warton. The plan is unsound, the figure should be increased or there will be housing pressures and shortages.

A developer objected to the proposed 370 per annum because it is considered insufficient to meet job growth in the borough. The 2012- based household projections project a starting point estimate of 221 dpa. Whether an adjustment to the starting point is needed is required depends on the results of the following tests:

Adjusting for Demographic Evidence: Two of the demographic forecasting scenarios undertaken by Edge Analytics presented in the Council's SHMA Addendum 2 document, present alternative demographic trend scenarios. The scenario base on 10 year net migration trends ensures a stable labour force and an associated growth of 320 homes a year: dpa (based on adjusted headship rates and including attributable population change) or 370 homes a year: dpa (based on adjusted headship rates and excluding attributable population change). However, the labour force growth would not be sufficient to meet the Council's or the wider LEP's growth aspirations.

Adjusting for Likely Change in Job Numbers: The council's own economic-led assessment (it is assumed the respondent is referring to Addendum 2) shows a requirement for a need for between 440 and 450 homes per annum to meet demographic and economic led need based on the Council's economic growth aspirations. The 2014 SHMA shows a requirement to plan for at least 400 homes per annum based on economic led need, so Addendum 2 shows that economic led need is now higher than that proposed in the SHMA.

Adjusting for Market Signals and Household Formation Rates: A worsening trend in any indicator will require an upward adjustment to the starting point.

The council's preferred approach is a target of 370 dpa, this is based on a 'business as usual' scenario of job growth. It is therefore considered that to 'boost significantly' the supply of housing, housing growth based on achieving economic growth in Fylde is required. Failure to meet this level of growth would wholly conflict with the council's growth aspirations. Based

on the above, it is concluded that the Local Plan is unsound as the proposed housing requirement has not been positively prepared and is not consistent with national policy.

The Housing Number is Correct

Finally, a planning consultant, on behalf of a landowner stated that they have no specific comments to make on the requirement of 370dpa as there have been a number of factors which have resulted in an uplift from the demographic starting point.

Council response

General Comments

In response to the general comments made to Chapter 10, the council agrees that the housing number will continue to be expressed as a minimum, it will also be made clear that it is a net requirement.

The council notes Highway England's comments and explains that the housing requirement figure is 370 homes per annum, however, the Local Plan includes enough sites to provide for 390 homes per annum, that is an extra 20 homes per annum, which is a total of 8,188 homes over the plan period to 2032.

The council agrees with Blackpool Council's suggestions that the housing requirement number for the plan period should be 7,770 rather than 7,700 and also that housing and employment policy allocation numbers should be shown on the maps.

The Home Builders Federation and a Planning Consultant suggested that the council should consider triggers for an early review. Criteria b) of policy **H1** states that the council will review housing delivery performance on the basis of rolling three year completion levels and if targets are missed by more than 20%, uncommitted sites will be brought forward to achieve a higher rate of delivery. References to phasing will be removed from the plan.

With respect to the objections raised by the Action Group, the location of new homes is set out in the Trajectory at **Appendix 2**, the evidence relating to the tenure and type is included in the SHMA. The Local Plan will not specify this level of detail because government guidance on these aspects of housing provision is changing all the time, and the plan would quickly become out of date. The council have checked with Keppie Massie who have not made any comments on oversupply, they did however state that some confidence has returned to the housing market.

The Home Builders Federation, a planning consultant and two developers have stated that the council should not be implementing a phasing strategy criterion d) of policy **HL1**). In the Preferred Option Local plan sites were phased at the request of United Utilities because of capacity issues with the wastewater system. However, since then United Utilities have confirmed that all issues can be resolved and so the decision was taken that the only assumptions about delivery in the RPO would be in relation to the stage that a site was at in the planning system e.g. no application received, reserved matters approved etc., build out

rates and also the size of the site, so a larger site would have more than one developer and the build out rates would be higher. These assumptions were agreed with the development industry at a Strategic Housing Land Availability Assessment Steering Group meeting and are included in the council's Five Year Supply methodology. The Council also contacted all the Local Planning Authorities in Lancashire, in order to check whether the build out rates being assumed for Fylde were realistic. Blackpool Council state that the RPO trajectory indicates that realistic lead- in times and build out rates have already been considered as part of the assessment.

From the Five Year Supply Statement 31 March 2015:

Build out rates and phasing

The build-out rates that are used in the calculations are the same as those that are used in the emerging Local Plan and the SHLAA 2015 update (to be published in autumn 2015). The SHLAA is a robust piece of evidence that is produced with input from a SHLAA Steering Group. The SHLAA assumes that 15 homes will be built in the first year and 30 homes in subsequent years. If the site has a capacity of more than 300 homes then it assumes that there will be two developers and the output will be doubled. Using these build-out rates means that a small number of large sites will not be fully delivered within the five years. The remainder would be delivered from year six onwards and is not factored into the five year supply. Only on sites with full planning permission and a signed Section 106 agreement (if applicable) will development be able to commence in year 1. Sites with outline planning permission, or sites where a Section 106 agreement is yet to be signed, will not be able to commence in year 1. It is anticipated that development will be able to commence on these sites as follows:

- Full planning permission, with signed Section 106 1-5 years
- Full planning permission, awaiting signing of Section 106 2-5 years
- Change of use, awaiting signing of Section 106 2-5 years
- Outline planning permission, with signed Section 106 2-5 years
- Outline planning permission, awaiting signing of Section 106 3-5 years
- Full planning application received and proposed allocation in emerging Local Plan 3-5 years
- Outline planning application received and proposed allocation in emerging Local Plan 4-5 years

This has resulted in a trajectory where the majority of completions will be delivered in the first fifteen years of the plan period, annual completion rates are lower after 2024 however, the total requirement is delivered over the plan period.

All references to phasing in the Local Plan will be removed; policy **H1** will be redrafted and there will be a cross reference to the SHLAA, which contains these assumptions.

With respect to paragraph **10.22**, it is useful to reference **Table 2** which contains a figure of 937 (11%) for allowances and unallocated sites.

The 937 homes comprises:

- Existing completions on small sites (0-9 homes) between 2011/12 – 2014/15 = 111
- Commitments / minded to approve on small sites (0-9 homes) = 296
- Allowance for small sites and windfalls (0-9 homes) = 480
- Long term empty homes re-entering the market = 50

Paragraph **10.22** includes 680 allowance for small sites and windfalls, this is a typographical error which should have read 480. The correct figure of 480 is included in **Appendix 2: Housing Trajectory**. This is an allowance for 40 homes per annum from year 6 of the plan period, this is based on past completion rates on these sites (development in gardens is not included in line with the Framework). Year 1-5 includes small sites for 1-9 homes as commitments. The council considers this approach entirely reasonable.

The Housing Requirement Number

The council welcomes the level of interest in the Housing Requirement Number, there were a good number of responses, with Parish Councils, the CPRE – Fylde District and residents saying the figure is too high, and the development industry saying the figure is too low. One planning consultant on behalf of a land owner stated that they were not commenting on the housing requirement number because the figure represented a significant uplift from the demographic starting point. No new evidence has been submitted.

Housing Number Too High

The five Parish Councils state that the figure is much too high, inspirational and totally unachievable and should be reduced accordingly, Medlar with Wesham Parish Council recommend a figure of 250 because historically this is the actual delivery figure. Previously developed land and unused employment land has been used instead of greenfield sites, to minimise the need for use of greenfield e.g. at the former Pontins and the former Marconi Site. The council has actively looked for previously developed land and carried out calls for sites but Fylde is not an industrialised area, therefore unused previously developed land is limited.

The employment land figure is covered in the response to policy **EC1** in Chapter 9.

The Planning Practice Guidance which is government policy requires Local Planning Authorities to use census data on population projections and household projections to calculate their future housing requirements, they are not permitted to use historic facts, in isolation. In particular, the country emerging from an economic recession and using historic data would involve projecting forward a period of decline, when the government is aiming to grow the national economy. The standard models used – Oxford Economics, Experian, Aecom etc. have been accepted when the evidence was examined at the Examination in Public, into Blackpool's Core Strategy, this is best practice, and is required by the NPPG. The affordable housing figure is 249 (paragraph **10.51**) not 420, affordable homes have been and will continue to be provided, however, the way that the Government defines and funds affordable housing has altered and this is having an impact. The affordable housing policy will be amended accordingly to reflect up to date national policy (see the response to policy

H4). Preston Council also has a housing requirement, and all of the development in Preston close to Fylde's border is needed to meet Preston's requirement figure.

In response to Medlar with Wesham Town Council's comments about the buffer, this extra 20 per year will be referred to as headroom, see the response to paragraph **10.17**. The housing requirement figure of 370 is a minimum net requirement, the extra 20 homes per annum allows some flexibility.

The CPRE – Fylde District are of the opinion that the figure is based on unrealistic scenarios leading to an unreasonably high figure. They reference the caveats in the Housing Requirement Paper 2015 and recommend that the figure should be 250 homes per annum. It is important to note that the Housing Requirement Paper contains housing market signal testing (as set out in the PPG) and this testing is used by the council to justify why the figure of 370 is the correct figure. Those tests cannot be used to reduce that figure to 250.

The council has revisited the housing number for Elswick and is proposing to reduce it to 50 (which is dealt with in Chapter 7).

Fylde is not meeting targets appropriate for the south east of England, Local Planning Authorities in the south east of England are having to provide land for tens of thousands of homes. The housing requirement figure is a product of the ONS data for Fylde. Sites that are under construction are being completed and sold. Some farmland will be built on, but having an up-to-date adopted Local Plan will mean that the land that is developed is in sustainable locations. All areas of the Borough are contributing towards the target, with Kirkham contributing 14%, Lytham St Annes 25% and Fylde -Blackpool Periphery 25%.

Another resident comments that more retired and economically inactive people will be attracted to the area. Otherwise the area will attract in commuters with pressure on highways which is unsustainable. Fylde already has high numbers of economically inactive people, and there are disproportionately high numbers of people in the 40-50 year age group who are likely to retire during the plan period. Fylde's economy will continue to lose jobs unless a sufficient number of homes are built to help stabilise the economy.

The Housing Number is Too Low

Allowances for windfalls and build-out rates have been dealt with in the general comments on the housing number, the council has collected evidence to justify its approach which is considered realistic and reasonable. The 'buffer' of 20 homes is not a buffer for persistent under delivery in the terms referred to in the housing land supply calculation and the Housing Delivery and Allocations Section of the Publication Version of the plan will refer to this small number of extra homes as "headroom", the council does include a buffer of 20% in its Five Year Supply calculation.

The NPPG requires council's to collect evidence in order to produce a housing requirement figure. The evidence base documents are:

- The Fylde Coast Strategic Housing Market Assessment 2013

- The Analysis of Housing Need in Light of the 2012 Sub National Population Projections Addendum 1 2014
- The Analysis of Housing Need in Light of the 2012 Sub- National Household Projections Addendum 2, 2015
- Fylde Housing Requirement Paper 2015

None of the respondents have questioned the evidence presented in these documents, or provided new evidence, however, they have questioned the way in which the evidence is interpreted.

All of the responses were from the development industry (landowners, planning consultants and developers) and they question whether the figure of 370dpa is sufficient to meet the council's and the wider LEP's growth targets and the need for affordable housing.

Other points raised include:

- Whether the figure would reduce unemployment;
- Blackpool has used Oxford Economic Projections and therefore so should Fylde;
- The SHMA is based on a period up to 2030, the Local Plan runs until 2032;

First of all it is important to note that the purpose of the Local Plan is not to meet the LEP's growth targets. There is no explicit obligation for the council to meet the LEP growth targets through its housing number. The council must meet its Objectively Assessed Need and take account of economic predictions. The SHMA, Addendums 1 and 2 and the Housing Requirement Paper justify the Objectively Assessed Need of 370 homes per annum and take account of economic predictions.

Secondly the relationship between jobs and workers is very complex. The numbers of workers and the numbers of jobs over the plan period will never be equal. The economic projections in the SHMA consider this from the demand side for example what will happen to various employers in different sectors of the economy during the plan period. The SHMA also considers the supply side for example how will the working age population change? More jobs does not necessarily mean more workers needing to live in the area. Jobs can be created and taken up for variety of reasons including: by reducing unemployment, people working longer before retirement and for specialised jobs – people choosing to travel into Fylde from both and short and long distances.

The council took the findings of Addendum 2 and carried out a reality check on the economic characteristics of the area. This is presented in the Housing Requirement Paper and has not been questioned by any of the respondents, a short summary of the main points is provided.

The local economic context is considered unusual in many respects. Usually the functional economic area would correspond closely to the Housing Market area as is often the case for a large conurbation. For Fylde travel to work patterns are extensive and the main employers are concentrated close to the Borough's boundaries at Salwick and Whitehills (a 15 minute drive from the M6), these locations generate journeys which cover at least two Local

Authority areas. The Enterprise Zones will operate at the national level in terms of the supply chain, investments and travel to work leading to the conclusion that Fylde's functional economic area is at least regional if not national.

Secondly there is a consideration of economic trends which is vital if the Local Plan is to be based on reality. From 2001-2011 there has been an average loss of employment of 48 jobs per year, at the same time an average of 245 homes per annum have been completed and there has been an annual historic take up 2.49 Ha of employment land. The construction of homes is not resulting in growth of the local economy and although more land is being used for economic development purposes this land is making less use of capital and labour (this is supported by further evidence in the SHMA and FELPS).

Thirdly, commuting assumptions, from the Census approximately 50% of people who live in Fylde work in Fylde and therefore 50% of those who work in Fylde do not live in Fylde. Changes to commuting ratios will be influenced by a range of factors over the plan period e.g. The Warton Enterprise Zone which given its specialist nature will draw labour from a much wider area, this is also true of the Enterprise Zone at Blackpool. Also the construction of the Preston Western Distributor road which will make it much faster and easier for workers to commute into Springfields and the Warton Enterprise Zone from a regional if not national labour market.

Finally with respect to neighbouring authorities' policies and plans, Blackpool Council have requested that Fylde make provision for 14 Ha of employment land to meet their predicted future demand. It is reasonable to expect that a considerable amount of any predicted jobs growth would draw workers from Blackpool as a result of this particular request being fulfilled and having regard to the location of employment land allocations close to the borough boundary.

Given the four points above (which are set out in more detail in the Housing Requirement Paper and which set out why Fylde is unusual), it can reasonably be concluded that the functional economic area of Fylde is at least regional if not national. The relationship between jobs and land is not a proportional one for Fylde, there isn't therefore the formulaic need to provide homes in relation to the allocation of employment land. Workers will continue to commute over long distances to Fylde because, in general, well paid work makes commuting worthwhile and there is easy access via the motorway network. Most Local Planning Authorities would aspire to achieve balanced commuting, however, Fylde has a unique set of circumstances and a functional economic area that extends well beyond the north west of England. This means that although Fylde aspires to grow its economy it is unlikely that these new workers will live within the Council's area and housing will not need to be built to accommodate them. This represents a housing market driver that needs to be considered at a more strategic level.

The Housing Requirement Paper then takes account of market signals as set out from Paragraph 019 of the PPG. It considers affordability in terms of house prices, rents and affordability and concludes that the figures are not signalling a particular imbalance between the demand for and supply of homes.

Turley also included an assessment of market signals in Addendum 2 and concluded:

Overall, therefore, while there is little evidence to suggest that there has been a significant worsening of market signals in Fylde, a modest uplift applied to the household projections could help to address affordability issues in the borough, and can ensure a relatively constrained position – in terms of backlog against planned supply is not projected forward.

None of this evidence has been questioned by any of the respondents. Fylde Council, therefore, continues to conclude that it does not need to increase its housing requirement number in order to address the need for affordable housing.

The Housing Requirement Paper also considers rates of development and completions expressed as a percentage of commitments. Completions expressed as a percentage of commitments is demonstrating an interesting trend. Commitments increased by 173% (859 to 2,343) from 2011/12 – 2012/13 and in the same period completions as a percentage of commitments fell from 16% to 7%. Commitments then increased again by 50% (2,343 to 3,525) from 2012/13 – 2013/14 and completions remained at 7% of commitments. For 2014/15 commitments have increased again to 3,864 and completions have fallen to 5% of commitments.

The development industry have not commented on this aspect of the housing market signals work, however they have requested that the housing requirement figure is increased. There have also been comments from the development industry that the build out rates in the trajectory are too high. It would have been useful to have some feedback on the realistic annual completion rates that the development industry could achieve throughout the plan period. The council's own monitoring demonstrates that the build out rates set out in the SHLAA are currently being realised.

Other comments were that the housing requirement figure does not provide scope to reduce the rate of unemployment. Fylde's unemployment rate is 3.5% (2015), this is already very low with the northwest at 5.9%. Unemployment is not a significant issue for Fylde, it is very low and the Council is more concerned about stabilising the economy.

Another respondent stated that the council should use the Oxford Economic forecasts because Blackpool had used them. This is not a good reason to use the Oxford Economic forecasts. Figure 5.26 – Index of Employment Change – All Authorities 2011-2030 demonstrates that there was no consistency between the two economic forecasts for the three authorities.

A housing developer comments that the SHMA is based on a period up to 2030, whereas the Local Plan is based on a plan period is up to 2032, there is therefore a need for additional evidence to justify this extension and the further implications for the Council's housing needs and supply. Paragraph 1.8 of Addendum 2 explains that it is important to note that when considering the modelling outputs presented in this report, that the projection period for which results are presented has been changed to 2011 – 2032 as opposed to 2011 2030 in the SHMA and Addendum 1.

Recommendations for change

- The housing requirement figure will be expressed as a net figure.
- A figure of 7,770 will be used throughout the plan for clarity.
- Housing and Employment Policy references will be included on the **Policies Map** to provide greater clarity.
- All references to 'phasing' will be removed from the Local Plan, there will be a cross reference at paragraph **10.15** to the assumptions on lead in times and build out rates in the SHLAA.
- The figure of 680 in paragraph **10.22**, will be corrected to reflect the total allowance for small sites and windfalls in the updated trajectory.

Policy H2 Density and Mix of New Residential Development

Number of representations:

Comment	Support	Object	Total
11	4	8	23

Representations received from:

- Home Builders Federation
- Bryning with Warton Parish Council
- National Custom and Self Build Association
- 1 Landowner
- 4 Developers
- 1 Action Group
- 2 Residents

What you said

Density

The Home Builders Federation and a developer supported the inclusion of the word 'normally' with respect to density, this provides flexibility. They then go on to comment that the desirability for executive style housing to retain employers and employees should be

*considered and the requirements to meet the national minimum space standards in policy **GD7**.*

A developer supported the maintenance of realistic and deliverable density levels.

A developer commented that the density range is too high for Local Service Centres and Tier 1 and Tier 2: Rural Settlements. The policy fails to allow for consideration of the specific form and character of individual settlements, it should be removed or the Council should prepare a credible evidence base to justify its proposed requirement for each settlement.

Mix

The Home Builders Federation and a developer recommended that because the SHMA will become out of date reference should be made to local needs at the time of the development, market and viability.

A landowner commented that it is far too prescriptive to suggest that every single development site has to comprise a specific number of 1 and 2 bedroom homes, and homes for the elderly, on both commercial and viability grounds.

*A developer stated that the section on mix is inappropriately requiring affordable house types, without the requisite affordable provision policy. This text should be moved to policy **H4**.*

A developer objected to the emphasis placed on small family homes which has the potential to delay the delivery of affordable housing in sustainable locations. It does not accord with Paragraph 14 of the Framework and should therefore be deleted.

Special Needs Housing and Specialist Retirement Accommodation

The Home Builders Federation supported the provision of housing for older people and other specialist needs. However, they objected on the grounds that the policy and supporting text are unclear on what the 20% requirement entails. Further guidance on the interpretation of this policy may be beneficial, references in the reasoned justification to the types of accommodation deemed to meet this need would assist in this regard. A developer also commented that the policy and supporting text are unclear what the 20% requirement actually entails. If the council were to interpret this as a requirement for the optional buildings regulations standards upon accessibility this would need to be formally tested through the plan, based on appropriate evidence. The NPPG identifies which criteria must be considered through the examination process to enable the introduction of the optional standards.

*Bryning with Warton Parish Council commented that Warton has 800 approved developments in ratio to what is required and none of which meet the genuine needs of policy **H2**, in particular the elderly where there does appear to be a shortage in appropriate*

housing. This is presumably because of the absence of the infrastructure of easily accessible public transport, health facilities and retail opportunities of a 'Local Service Centre'.

An Action Group objected and stated why has it been so hard (with 6 building sites in Wrea Green since 2011) to get this type of accommodation, it was mentioned in the draft Neighbourhood Plan and the 2012 Housing Need Survey.

*A developer remained in agreement with the policy and the council's admittance that specialist accommodation is needed in Fylde however, we remain concerned that the justification to this policy (paragraphs **10.28 to 10.33**) remains negative and contradicts itself.*

Community Self Build

*The National Custom and Self Build Association commented that policy **H2** does not mention those that wish to build their own home but are unable to do so as part of a community scheme, the plan is therefore not consistent with national policy.*

*Furthermore, the plan cannot be said to be positively prepared as there has been no attempt to measure the demand for self-build in the borough, if it is not assessed it should be assumed that there is some demand. As a consequence of this failure to identify demand there is no provision for self-builders on large sites in the way that there is for those unable to build their own home by the way of affordable housing. Also the plan does not allow custom – or self-build on rural exception sites which would provide a more affordable route for those that are unable to afford a new market home and unable to secure an affordable home. A requirement for large developments to include the provision of a percentage of self-build plots (perhaps 5%) should be added to policy **H2** to meet the demand for self-build.*

A landowner commented that the council cannot suggest that developer contributions need to be provided for self-build schemes this would not be CIL compliant.

Justification

For clarity these responses are in paragraph order and the paragraph number is included in brackets.

*A resident commented that to sustain vehicular access proper safe cycle ways are needed, not white lines or shared pavements, these do not work. Proper cycle ways, with kerbed boundaries will also help reduce vehicular access as the more cyclists will reduce the space for traffic and encourage more cycling (paragraph **10.27**).*

*A developer objected to paragraphs **10.28 to 10.33** on the grounds that they are counterintuitive. They contest the Council's assertion that the development of flats is driving the in migration of retirees into Lytham St Annes, retirees are attracted for a variety of*

reasons. The Council considers that 80% of households are under-occupied, household size is decreasing, in tandem with an aging demographic profile and new homes tend to be larger, it would appear that smaller specialist accommodation for the elderly that releases larger family housing back into the market would be highly beneficial for the Authority. It makes sense that older owner occupiers in rural areas would look to move to areas with greater accessibility to shops and services to prolong their independence. Lytham and St Annes are the most suitable locations. Focussing the provision of medium sized family housing in the most suitable locations for specialist housing will encourage elderly persons to purchase and continue to live in unsuitable accommodation in order to have access to services. By focusing on family housing which, demographically, is a lesser priority than specialist accommodation for the elderly, the council will at least disadvantage existing elderly residents within the district who need to move into specialist accommodation.

An Action Group objected – this was identified in Wrea Green 3 + years ago and has FAILED to be planned for or delivered. Now all the appropriate sites are full of 4/5 bedroomed detached homes so it is now too late! (paragraph 10.38). They also object to the fact that paragraph 10.40 was not applied to recent developments in Wrea Green, instead approvals given will overwhelm service and the infrastructure.

A resident stated that paragraph 10.35 is a very restricted view of the expression ‘self-builder’. Normally the term includes people who directly fund the building of their own home rather than actually build it.

Council response

Density

The council welcomes the support of the Home Builders Federation and two residential property developers for the flexibility in the policy. The SHMA contains a lot of evidence about the types of homes that will be needed in the plan period, Table 4.2 sets out the types of homes found in Blackpool, Fylde and Wyre. The proportion of detached housing in Fylde is higher than both the national and Fylde Coast averages. Figure 7.22 sets out the estimated size of properties required in Fylde. In fact, the greatest need (approximately 60%) is for two and three bedroomed properties rather than for executive style housing. The comment on the National Technical Standards is noted.

A minimum density of 30 homes per hectare is not considered too high for Local Service Centres and Tier 1 and Tier 2: Larger and Smaller Rural Settlements, respectively. It is important that the Local Plan makes efficient use of land. The SHMA sets out a wealth of evidence on the current profile of properties in Fylde and a detailed breakdown of what will be needed in the future. For Fylde it is predominantly two and three bedroomed properties. In particular this will allow for older people to downsize, whilst remaining close to friends and family, releasing larger properties for families. Smaller properties can readily complement the specific form and character of individual settlements. The Local Service Centres and Tier 1 and Tier 2 settlements do include many smaller homes in the form of traditional terraces, former estate workers homes and cottages. It will therefore be easier to

respect the specific form and character of these settlements by building at 30 homes per hectare than it would be at lower densities with larger properties.

Mix

The council agrees that there should be reference to the use of updated needs assessments that are produced within the plan period. With respect to the issue of viability the whole local plan was subject to Viability Appraisal, and the overall conclusion was that it was deliverable.

With regard to mix the policy states that a broad mix will be required on all sites to reflect the demographics of the Borough. On sites of less than 100 homes the Council requires a mix that makes a positive contribution to the vitality of the community. In the settlements the policy says that one, two and three bedroomed homes with private amenity space should be included in the mix. Again in rural areas a mix should be provided in particular small family homes with private amenity space. Figure 7.22 in the SHMA sets the estimated size of properties required in Fylde, the greatest need is for two and three bedroomed properties. Policy **H2** does not state that a specific number of one and two bedroomed properties will be required, it reflects the evidence presented in the SHMA.

Figure 7.22 in the SHMA, demonstrates that about 60% of the need is for two and three bedroomed homes. The evidence in the SHMA is intended to meet projected needs to 2030. It is acknowledged that it will become out of date therefore reference will be made in policy **H2** to any more up-to-date housing needs studies that are carried out in the period to 2032.

The section on mix does include a reference to tenure and affordable housing and these references will remain in policy **H2** as both are a component of housing mix.

The evidence presented in the SHMA highlights that the need is for 2 and 3 bedroomed homes. In particular smaller homes are needed in the rural areas so that, if they wish to, older people can downsize to a property with a garden whilst remaining close to family and friends. This then releases larger homes for families into the market. Paragraph 14 of the Framework states that Local Planning Authorities should positively seek opportunities to meet the development needs of their area;

The council has provided the evidence which shows that smaller properties are needed, it would not be meeting the development needs of the area if it ignored that evidence.

The council will continue through the development management process to seek to deliver a wide range of house types to meet the needs of local communities.

Special Needs Housing and Specialist Retirement Accommodation

The council agrees that it should be clear what is meant by 'homes designed specifically to meet the needs of the elderly'.

The policy does require that 20% of homes in developments of 15 or more should be designed to accommodate the elderly. Government policy has changed since the Revised Preferred Option was written, the National Technical Standards for Housing, were introduced in October 2015, these include optional standards for Access and Water, there is also an Optional Nationally Described Space Standard for Internal Space Standards. These optional standards, if introduced make homes more suited to the needs of elderly people.

The council is reviewing its evidence base and the scope of the Affordable Housing will be expanded to cover this issue.

The council will continue through the development management process to seek to deliver a wide range of house types to meet the needs of local communities, this will include the needs of elderly people.

Bryning with Warton Parish Council comment that there is a shortage of housing for the elderly in Warton. The council would welcome the opportunity to work with the Parish Council to collect evidence of the scale of this need so that it can be addressed in future.

The council notes the Action Group's objections.

The council welcomes the support of a developer for the policy. The comments on the reasoned justification are covered in the following section of the council's response.

Community Self Build

At the time of writing the term Community Self Build was correct. Custom and Self Build has risen up the current government's agenda since the Revised Preferred Option was written. The Self-Build and Custom Housebuilding (Register) Regulation 2016 was released on 4 February 2016. The council is required to have a Register for Custom and Self Builders in place by 1 April 2016.

The council will assess the demand for self-build and then consider the most appropriate methods for meeting this demand.

Justification

The comments on cycle ways are dealt with under policy **T3** in Chapter 12 and in the IDP.

With respect to the objection to paragraphs 28 – 34 the council makes it clear that the large number of flats is one factor which attracts retirees to Lytham and St Annes, retirees are attracted for other reasons for example there are lots of activities for retired people and crime rates are low. The council's Housing Service have carried out Housing Needs Surveys in some of the rural villages and they revealed that many of the elderly people in the villages did wish to downsize to smaller homes within their village. They wanted to stay close to family and friends and did not express any desire to move to Lytham St Annes. The provision of flats suitable for retirees has been a factor in attracting high numbers of elderly people to Lytham St Annes. This has had a detrimental impact on the local environment with

traditional detached homes being replaced with modern blocks of flats, particularly in St Annes and along the coast to Lytham. There is already plenty of this type of accommodation in St Annes and it has made up a high proportion of recent completions. The objection commences by contesting that the development of flats attracts retirees, it then refers to smaller specialist accommodation for the elderly. Many of the flats built in Lytham St Annes are not small and neither are they specialist accommodation. The council accepts that some small specialist accommodation will be required however, rather than building more flats (which are not small or specialist) the evidence in the SHMA Figure 7.22 demonstrates that about 60% of provision should be two and three bedroomed homes. These should be homes with outdoor space which will be attractive to both families and retirees looking to downsize. This will help deliver a wider choice of high quality homes, widen opportunities for home ownership and create inclusive and mixed communities, as required by the Framework paragraph 50. The need for small specialist accommodation is referred to in paragraphs **10.38 - 10.40** of the Local Plan.

The objection by the Action Group in relation to paragraphs **10.38** and **10.40** is noted.

The resident's objection to paragraph **10.35** is covered in the response to Custom and Self-Build within policy **H2**.

Recommendations for change

- In relation to mix, reference needs to be made to up-to-date housing need surveys that are carried out in the period up to 2032.
- The text on Custom and Self Build will be updated

Policy H3 Conversions and Change of Use to Residential

Number of representations:

Comment	Support	Object	Total
1	0	1	1

Representations received from:

- Council for the Protection of Rural England (CPRE) – Fylde District
- 1 Action Group

What you said

CPRE – Fylde District recommended that policy **H3** Conversions and Change of Use to Residential should acknowledge that provision of new homes may also come from the re-designation of holiday homes, typically park homes.

An Action Group objected - This is a plan from 2011 to 2032 so are current economic conditions relevant? (paragraph **10.47**)

Council response

With respect to the CPRE – Fylde District response, the council considers that holiday homes are an important part of the tourism economy and they should not therefore be included in policy **H3**.

Current economic conditions are entirely relevant, the country has only just come out of recession. People are moving around the country to find work and they need the flexibility of high quality rented accommodation to enable them to move into an area for work, even if it is only for a short period.

Recommendations for change

- Amend the second paragraph of policy **H3** to read ‘and the promotion of good design’

Policy H4 Affordable Housing

Number of representations:

Comment	Support	Object	Total
13	4	8	25

Representations received from:

- Blackpool Council
- Medlar with Wesham Town Council
- Blackpool, Fylde and Wyre Trades Union Council
- National Custom and Self Build Association
- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner
- 1 Planning Consultants
- 4 Developers
- 1 Action Group
- 2 Residents

What you said

General Comments

The National Custom and Self Build Association commented that the evidence for the Local Plan does not make any reference to custom and self-build and there is no indication that the council has tried to establish the need for self-build. Policy H4 does not include the provision of any version of affordable custom or self-build. It also stipulates that 100% affordable housing rural exception sites will be permitted where a need has been proven but does not include affordable custom or self-build as forms of residential development that would be considered appropriate. Self-build homes proposed on such sites could be permitted with conditions capping the resale value and limiting the sale to those with local connections in order to increase the supply of affordable housing for local people. The Local Plan does look to meet the needs of those who wish to build their own home, but this is limited to community self-build projects, the needs of those who wish to build their own home, but that are unable to do so as part of a community scheme are not catered for.

The CPRE – Fylde District, a planning consultant and a developer commented that the plan must take full account of the Government's emerging objectives for affordable housing having regard to the requirements set out within the emerging Housing and Planning Bill for the provision of starter homes for first time buyers. The CPRE- Fylde District understand that these may be classed as low-cost market housing outside the definition of affordable homes and that the council will have a duty to deliver 'starter homes' as part of new housing developments.

An Action Group objected because 'Pepper-potting' (paragraph 10.65) has NOT been the approach for any of the approved sites in Wrea Green, and really needs to be implemented, this has been pointed out on a number of occasions as it is a standing process, but then ignored.

A resident objected to the policy stating that there appears to be no appetite for developers to build the social housing and affordable housing that is expected by planning approvals, this needs to be addressed. Perhaps one way would be to insist that after 50% of the development has been constructed, the social and affordable housing should be completed before the remainder of the development is allowed to continue.

The Amount of Affordable Housing

Medlar with Wesham Town Council objected and state that the level of 249 for Fylde is far too high and will never be delivered, particularly in the current climate with housing associations not taking up 106 agreements. This figure needs to be reduced. They also question the methodology that produced the need.

Bryning with Warton Parish Council commented that section 10.50 indicates a Warton need of 59 affordable dpa based on Addendum 1 of the SHMA, yet actual experience with the professional bodies indicates there is no such requirement and no need of such local provision. The analysis can only be concluded to be seriously flawed supporting the

inaccurate methodology of future housing requirements, this impacts significantly on Warton.

The Blackpool, Fylde and Wyre Trades Union Council which represents about 25,000 trades union members welcomed new development in the Fylde, including new homes and jobs, however, enough social housing should be included in the plan to take account local need and the quite dramatic drop in the proportion of owner occupiers over the last number of years.

An Action Group objected to the number and states that 370 – 249 leaves only 121 market homes as the requirement and the supply far exceeds the demand already, evidenced by the slowing building rate. Affordable homes should be built where there is employment and infrastructure and not just ANYWHERE and that proposed homes are of a type and tenure to meet any demand. There needs to be full agreement prior to approval as to the percentage of affordables and prior agreement with a Registered Provider to take on the affordables once these are constructed. These matters should NOT be dealt with post approval.

*A resident objected to policy **H4** and states that the affordable housing number no longer makes sense and the policy must be adjusted. Over recent years obligations to provide 30% have rarely been met and quite often has been reduced considerably.*

On Site Provision of Affordable Housing

A developer supported the principle of delivering affordable housing on site in Tier 1: Larger Rural Settlements, however, they comment that there should be the flexibility to deliver off site, or via a contribution in lieu of onsite provision should the level of identified need be less than 30%. The offsite contribution would then be used to provide affordable housing in another settlement of greater need.

Tenure

A landowner commented that many of the developers delivering the approved strategic housing sites have experienced significant difficulties in finding and securing social housing providers prepared to take on social rent properties. Under these circumstances a minimum threshold of 80% is not considered appropriate or feasible. In particular the recent announcement on the Housing and Planning Bill which emphasises the government's commitment to alternative forms of affordable housing provision. It is therefore considered unjustified to specify tenure mix in the Local Plan.

A planning consultant commented that the flexible case by case approach must be supported by up-to-date evidence and regular correspondence between council officers and Registered Providers to ensure that each scheme properly reflects the local market and requirements of affordable housing providers; and can be agreed in a timely fashion, as the current process for negotiating housing tenure within Fylde has led to delays, this section should include a reference to this.

A developer supported the text relating to the tenure of affordable housing stating that;

The precise requirements for the tenure of affordable homes will be negotiated on a case by case basis, having regard to the viability of individual sites and local need. They then go on to comments that the subsequent text stating that; at least 80% of the affordable homes should be for housing association rented, is not justified and is unnecessary and should be deleted from the policy.

Viability

A landowner and a developer considered it unreasonable that the applicant should meet the cost of the independent verification of evidence which the council is requesting when they have already paid an application fee, this requirement is unjustified and has the potential to stall the delivery of development, and should therefore be deleted.

A planning consultant, and a developer supported the fact that the policy does include flexibility by referring to viability, but then goes on to comment that it is imperative that the policy requirement is set at a level which delivers in the majority of cases.

*An Action Group objected because paragraph **10.67** has NOT been the approach for ANY of the approved sites in Wrea Green and really needs to be implemented. This has been pointed out on a number of occasions but then ignored.*

Calculation of Commuted Sums

*Blackpool Council commented that paragraph **10.71** states that financial contributions may be considered acceptable where the site is deemed by the Council to be unsuitable for affordable housing. However, this could be broadened to include circumstances where a commuted sum could meet other housing policy objectives, as referred to in paragraph **10.68** of the RPO.*

An Action Group objected and stated that this appears to be out of date according to the sums I have seen (£50,000 per property) and is now delayed instead of being made available now.

A landowner commented that the explanation of how off site affordable housing is calculated is unclear. It is considered that such a calculation should be contained in a guidance document rather than the Local Plan.

General Comments

The council welcomes the detailed comments it has received on its Affordable Housing policy.

With respect to the comments from the National Custom and Self Build Association the council will assess the demand for Custom and Self-Build by setting up a Register, the description/definition of Custom and Self-Build will also be updated as set out in the response to policy **H2**.

The Publication version of the Local Plan will take full account of the Government's objectives for affordable housing by having regard to the requirements set out in the emerging Housing and Planning Bill for the provision of starter homes for first time buyers.

The objection to paragraph **10.65** from the Action Group is noted. It is not always possible to 'pepper pot' affordable provision. The definition of affordable housing is changing to include starter homes which may be more easily integrated into larger developments.

With respect to the resident's objection, recent Government changes around rent re-structuring has meant that Registered Providers (RPs) have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the RP sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The Government is also in the process of changing the definition of affordable housing to include starter homes which will provide better financial returns to developers. The provision of affordable housing is undergoing significant change, the Council is monitoring the emerging Planning and Housing Bill, and the Local Plan will be amended to reflect its requirements.

The Amount of Affordable Housing

The SHMA included an assessment of the need for affordable housing which suggested that there was a net annual affordable need for 207 affordable homes per annum over the first five years of the plan falling to 204 per annum once the backlog was cleared. A key component of this calculation is the gross household formation rate, which was updated in the 2014 Addendum 1 report to take account of the 2012 – based population projections, this increased the need from 207 to 249 homes per annum.

The council notes that no new evidence has been presented in relation to the need for affordable housing.

Medlar with Wesham Town Council and the residents objections are noted, recent Government changes around rent re-structuring has meant that Registered Providers have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the Registered Provider sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The affordable housing number will be changed if the evidence changes, it should not be adjusted or reduced because there are difficulties with delivery. Medlar with Wesham Town Council have not explained how the methodology needs to be changed.

With respect to Bryning with Warton Parish comments the figure of 59 affordable homes per annum is for Kirkham and Wesham and Freckleton and Warton (not just Warton), the council is not aware of any evidence from the professional bodies that the figure should be lower. However, it is willing to appraise any new evidence. This figure does not impact on the annual housing requirement figure, the council and Turley have carried out Housing Market Signals Testing on the Housing Requirement Figure which concluded that the

objectively assessed housing need figure (370), did not need to be subject to an uplift in order to meet the need for affordable housing.

The council welcomes the comment from the Blackpool, Fylde and Wyre Trades Union council, which welcomes new development in Fylde, including new homes and jobs, and also comments that enough social housing should be included in the plan to take account of local need and the quite dramatic drop in the proportion of owner occupiers over the last number of years.

With respect to the action group's objection, the annual housing requirement figure of 370dpa has been tested by both the council and Turley and this testing revealed that 370 homes per annum would deliver sufficient affordable housing. This testing is set out in Addendum 2 (Turley) and the Housing Requirement Paper 2015. This evidence has not been questioned. Affordable Housing is also provided by the private rented sector and this will make up the remainder of the requirement. New affordable homes will be built where there is employment and infrastructure with 80% of them being built at the strategic locations for development. Planning consents do detail how affordable housing will be provided, however, recent Government changes around rent re-structuring has meant that Registered Providers have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the Registered Provider sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The council cannot force developers or Registered Providers to enter into unviable arrangements and the council is reviewing its policies in order to facilitate the provision of affordable housing.

On Site Provision of Affordable Housing

The developer's comments are noted. The policy does offer flexibility because it states that where the applicant has submitted robust evidence to demonstrate that the application site or location is unsustainable for affordable or Special Needs Housing; OR there is no locally identified need, the affordable housing contribution or the balance of that contribution, will be expected to be delivered elsewhere in the borough.

Tenure

The council agrees that given the recent changes to Government policy it is unreasonable to require that 80% of the affordable homes should be for housing association rented; the remainder would be at a tenure to be agreed with the council. The council awaits the emerging Housing and Planning Bill and the Local Plan will be redrafted to reflect the Government's commitment to alternative forms of affordable housing provision.

The planning consultant's comments are noted, the council is committed to collecting up-to-date evidence and having on-going dialogue between council officers and registered providers. A paragraph mentioning this on-going commitment will be included at the start of the justification for on-site provision.

Viability

The council does not consider it unreasonable to include a statement in the policy requiring that the applicant provide robust evidence of the viability of a scheme, when they are seeking the approval of a scheme with lower levels of affordable housing than the policy requirement.

The council agrees that it is imperative that the policy requirement is set at a level which delivers in the majority of cases. The council is awaiting the emerging Housing and Planning Bill, affordable housing policy will be rewritten to reflect the requirements of the Bill, and the viability of this policy will be tested when the Local Plan is published.

The objection from the Action Group is noted, the council is collecting evidence on the need for accessible homes in accordance with the NPPG. This evidence will inform a decision on whether or not to implement the optional accessibility standards. These accessible homes are suited to the needs of elderly residents.

Calculation of Commuted Sums

The council notes Blackpool Council's comment.

The council agrees that the calculation of commuted sums should be set out in a guidance document. Paragraph **10.71** states that the formula for calculating the commuted sums *in-lieu* of on-site provision will be set out in the Affordable Housing Supplementary Planning Document, which will be prepared and issued for consultation in 2017.

The calculation of commuted sums will be affected by the Housing and Planning Bill as starter homes will be included in the definition of affordable homes so this will affect the proportion to be provided for rental by registered providers.

The objection made by the Action Group is noted. The council agrees that its draft Affordable Housing policy is out of date given the emerging Housing and Planning Bill.

Recommendations for change

- Policy **H4** will be updated to reflect the changes introduced by the emerging Housing and Planning Bill.
- The council is committed to collecting up-to-date evidence and having on-going dialogue between council officers and registered providers. A paragraph mentioning this on-going commitment will be included at the start of the justification for on-site provision.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text on Affordable Housing in Chapter 10, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend section ii) in policy **H4** by deleting ‘Elswick’ from the list of **Tier 1 Larger Rural Settlements** and adding ‘Elswick’ to the list of **Tier 2 Smaller Rural Settlements**.
- Amend the text under **Tenure** in policy **H4** to read: ‘The precise requirements for tenure of affordable homes will be negotiated on a case-by-case basis, having regard to the viability of individual sites and local need. ~~At least 80% of the affordable homes should be for housing association rented; the remainder would be at a tenure to be agreed with the council.~~ Where an element of affordable housing is required, the proportion of rented properties should reflect what Registered Providers are able to provide; the remainder to be at a tenure to be agreed with the council.’
- Amend the text under **Design** in policy **H4** to read: ‘All new affordable homes should comply with ~~all relevant design and quality codes and standards set out by the Homes and Communities Agency or other relevant body,~~ as well as the National Technical Standards; and the requirements for design set out in policy GD7.’
- Amend the first sentence of paragraph **10.55** to read: ‘The definition of affordable housing is set out in Annex 2 of the Framework and repeated in the Glossary to this Local Plan.’
- Amend text in paragraph **10.63** to read: ‘the proportion ~~for~~ of social rented properties’
- Amend paragraph **10.64** to read: ‘Where affordable housing is provided the mix in terms of tenure, type and size must reflect the assessed needs, as set out in the SHMA or the most up-to-date data available in the Council’s evidence base, ~~which is currently as a majority of one, two and three bed properties.~~ The council will negotiate the exact tenure, type and size split on each site through discussions.’
- Amend the last sentence of paragraph **10.65** to read: ‘...appropriate layout ~~and phasing~~ of development ...’
- Amend the third sentence of paragraph **10.66** to read: ‘Such housing should comply with all relevant ~~design and quality codes and standards set out by the HCA or other relevant body,~~ as well as relevant national technical standards and where appropriate, local standards.’
- Add the following text to paragraph **10.71**: ‘or to enabling empty homes to be brought back into use.’

Policy H5 Gypsies, Travellers and Travelling Showpeople's Sites

Number of representations:			
Comment	Support	Object	Total
3	0	2	5

Representations received from:

- The National Federation of Gypsy Liaison Groups
- The National Farmers Union (NFU)
- The Council for the Protection of Rural England (CPRE) – Fylde District
- Lancashire County Council - Planning
- 1 Travelling Showperson

What you said

Lancashire County Council has reviewed its land holdings and has confirmed that it does not have any land suitable for the provision of Gypsy and Traveller Pitches in Fylde.

*The National Federation of Gypsy Liaison Groups objected to policy **H5**, it is not compliant with planning policy for Traveller Sites which requires that Local Plans must set out criteria to be used in determining applications that come forward irrespective of need. Policy **H5** sets out criteria which will only be applied in the absence of sufficient sites coming forward to meet the identified need and **criteria (a)** requires that there is evidence of need for a new Gypsy, Traveller or Travelling Showpeople's site". The policy does not meet the guidance in the PPTS, the reference to identified need must therefore be removed. Criteria (b) is unacceptable in restricting sites within "An Area of Separation". Criteria (d) is too restrictive. It should not say not significantly harm...."The Policy should also acknowledge that regular reviews of the need will be undertaken and that steps will be taken to deliver sites in accordance with changing circumstances. The policy should also acknowledge that the need identified in the GTAA represents a minimum level of provision.*

The National Farmers Union commented that there is a need to ensure that provision is also made for the associated livestock when selecting sites. When this isn't taken into account it can often lead to issues with fly-grazing, which is not only a form of trespass but also has biosecurity implications.

CPRE – Fylde District commented that it is the responsibility of the Local Plan to allocate suitable Gypsy, Traveller and Travelling Showpeople sites, otherwise such sites should not be allowed as an exception to restrictions for development in the Fylde countryside. We highlight that there are ongoing negative impacts associated with the site in the countryside area at Fairfield Road, Hardhorn.

*The Travelling Showperson did not agree with criterion f) of policy **H5** as in some cases smaller sites for Travelling Showpeople would be ideal.*

Council response

The council notes that LCC has stated that it does not have any land suitable for Gypsy and Traveller pitches in Fylde.

With respect to the points made by the National Federation of Gypsy Liaison Groups, the definition of a Gypsy, Traveller and Travelling Showperson has changed. The council (along with Blackpool and Wyre Councils) has commissioned Opinion Research Services to carry out an update of the Gypsy and Traveller Accommodation Assessment (GTAA), in order to align it with the new definition. The policy (**H5**) has been used to approve two sites for Gypsies in Fylde, one in the countryside between Wrea Green and Warton and another at Newton (the Inspector gave significant weight to **H5**). Once, the council has an updated GTAA policy **H5** will be updated to reflect the requirements of the emerging Housing and Planning Bill and the up-to-date evidence of need, it will also be amended to reflect the fact that the updated identified need is a minimum provision.

The council notes the NFU's recommendations. However, under current legislation this is not a requirement when considering the provision of sites for Gypsies, Travellers and Travelling Showpeople.

The council notes the comments made by CPRE – Fylde District are noted. The council will have to meet the needs of Gypsies and Travellers (under the new definition) and in accordance with the Housing and Planning Bill, in performing its statutory function as the Local Planning Authority.

Criterion f) in policy **H5** is intended to promote smaller sites for Gypsies and Travellers, with smaller numbers of families on them. It is not applied to sites for Travelling Showpeople because they usually need a larger site in order to store and maintain their equipment. However, if a Travelling Showperson wanted to live on a small site and wished to apply for planning permission, the council would consider that site on its merits.

Recommendations for change

- Policy **H5** will be updated in line with the updated GTAA and the Housing and Planning Bill
- Delete (~~Criterion f does not apply to Travelling Showpeople Sites~~)

Additional recommendations for change

The Government has withdrawn the Designing Gypsy and Traveller Sites Good Practice Guide DCLG 2008 and so reference to this guidance will need to be deleted from the plan. It will be necessary to establish a series of local design criteria to ensure that Gypsy and Traveller Sites are designed in an appropriate manner.

Additional recommendations for change

- At Paragraph f), delete ~~The detailed design of the site for Gypsies and Travellers should be in accordance with The Designing Gypsy and Traveller Sites Good Practice Guide DCLG 2008.~~
- That a series of design criteria are drafted for inclusion in the local plan.

Policy H6 Isolated New Homes in the Countryside

Number of representations:

Comment	Support	Object	Total
2	0	0	2

Representations received from:

- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner

What you said

*The CPRE – Fylde District commented that criteria b) of **H7** and the justification at paragraph **10.85** should also apply to isolated new homes in the countryside.*

A landowner commented that other circumstances are identified in the framework whereby isolated new homes in the countryside will be permitted. These include; Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; where the development would re-use redundant or disused buildings and lead to enhancement in the

immediate setting; These allowances should be included within the policy to ensure its compliance with the Framework.

Council response

With regard to the CPRE – Fylde District comment, criterion a) to d) of policy **H6** which are taken directly from the Framework are considered to provide stronger protection for character of the surrounding rural area with regard to scale, design and use of materials than criterion b) of **H7**, which would effectively weaken the policy and mean that it did not comply with paragraph 55 of the Framework.

The council agrees with the landowner that the text should be added to policy **H6** text to bring it into line with the Framework regarding heritage assets.

Recommendations for change

Add the following text to policy **H6**: 'Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; where the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting;'

Additional recommendations for change

Two of the following additional changes are proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan; and a further change is proposed to clarify and update the existing text on new homes in the Countryside in Chapter 10 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add an extra criterion to section 2 in policy **H6**: 'e) protect the local environment.'
- Amend paragraph **10.81** to read: 'For social, economic or environmental reasons it is often preferable for rural workers to live close to their place of work. However, because of continuing high demand for rural homes by the general community, the council considers it is necessary that applications for isolated homes in the countryside for rural workers' occupation fulfil the criteria set out in policy **H6**. Ballam, Greenhalgh, Larbreck, Little Eccleston, Mythop, Roseacre, Thistleton, Treales and Wharles are located within the countryside. Given their respective sizes, lack of services and facilities, they will not be seen as a focus for new development. Proposals for infill development for new homes may be acceptable provided they comply with other policies in this Local Plan. Fylde Council will continue to work with Lancashire County Council to address traffic issues in these countryside areas.'

Policy H7 Replacements of, and Extensions to, Existing Homes in the Countryside

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- 1 Landowner

What you said

A landowner objected claiming that the Local Plan should not be setting a specific figure to restrict the size of a replacement home or domestic extension. Every proposal should be considered on its own merits. Such figures should be contained within a guidance document rather than a Local Plan policy.

Council response

The council disagrees with the landowner's comment. The Local Plan contains policies for the management of development. There is an issue with small rural homes being replaced by much larger properties. This is making it more difficult to buy a small rural property and it is also having a negative impact on the rural landscape.

Recommendations for change

- None

Chapter 11: Health and Wellbeing

Chapter 11: General Comments

Number of representations:

Comment	Support	Object	Total
1	0	1	2

Representations received from:

- Blackpool Council – Planning
- 1 Action Group

What you said

Blackpool Council commented that reference should be made to the proposed neighbourhood planning approach to Marton Moss which lies on the Blackpool/Fylde boundary. There is potential for a joint evidence base strategy relating to biodiversity in this area, which could be explored through the Duty to Co-operate process.

The Action Group commented that they regularly point out traffic issues in relation to new residential development in Wrea Green, which have been ignored, yet Fylde has a higher than average toll of road deaths.

Council response

In response to Blackpool Council's comments, it was agreed at the Fylde Coast Authorities and Lancashire County Council Duty to Co-operate meeting in July 2015 that a joint Fylde Coast Biodiversity and Nature Conservation Supplementary Planning Document (SPD) would be prepared. The scoping of the SPD will take place prior to the issuing of the Publication version of the Local Plan in summer 2016, as requested by Natural England. Therefore, the council considers that the Marton Moss site will be addressed in this.

In regards to the Action Group's comments, the council consult regularly with the Highways Authority (LCC) and Highways England in relation to highway issues on planning applications. Any objections raised by these statutory bodies are accounted for in the determination of the application.

Recommendations for change

- None

Policy HW1: Health and Wellbeing

Number of representations:

Comment	Support	Object	Total
0	0	2	2

Representations received from:

- 1 Action Group

What you said

An Action Group objected claiming that the cycle routes are on narrow fast moving C roads and are not marked out, leading to unsafe cycle routes. Wrea Green has no NHS facilities, development still gets approved, and this matter is raised in the draft Neighbourhood Plan.

Council response

The council notes the Action Group's comments. This point is covered in the council's Infrastructure Delivery Plan (IDP), which accompanied the RPO version of the Local Plan. Cycle provision is set out in detail in section 2 of the IDP and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council considers that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- None

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following text to criterion c) in policy **HW1**: 'and with providers of other social and community infrastructure to deliver appropriate facilities in accessible locations, to meet local needs.'

- Amend criterion f) in policy **HW1** to read: ‘Promoting improvements to healthy lifestyles and developing a network of cycling and pedestrian routes ~~within the Borough~~ - linking key settlements and service centres, enabling the community to improve their health by travelling by more sustainable modes of transport - integrated into a wider multi-functional green infrastructure network;’
- Add a new criterion to policy **HW1**: ‘The reduction of health inequalities and initiatives to facilitate healthier lifestyles will be supported, where these can be delivered through the planning system.’

Policy HW2: Community Facilities

Number of representations:

Comment	Support	Object	Total
4	0	3	7

Representations received from:

- Highways England
- Lancashire County Council – Planning
- Lytham St Annes Cycle Group
- 1 Action Group

What you said

*Highways England commented that as the policy is new, the response made to policy **INF1** remains applicable and in line with this policy.*

*Lancashire County Council (LCC) commented that due to LCC financial constraints there will be significant changes in the future to delivering services within neighbourhood centres. It is critical to ensure that the appropriate services are available to those that need them most. It is within this context that the wording of Policy **HW2** should be made more flexible to allow these necessary changes.*

*LCC commented that, in terms of criterion g) of policy **M1**, the overall housing provision in the Local Plan could bring forward the need for 6.5 additional primary forms of entry and approximately 787 secondary school places over the plan period. Depending on the position and feasibility of expansion of existing schools at the time of delivery of these developments there is a potential requirement for additional primary sites and an additional secondary school site. Given the scale of development, there may be a need to identify additional*

primary school sites. The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham; this site should remain within the Local Plan.

Lytham St Annes Cycle Group commented that the secondary care services as mentioned in paragraph 11.13 are provided by Blackpool Teaching Hospitals NHS Foundation Trust and not Lancashire as written.

The Action Group commented that the local ONE stop shop in Wrea Green sells convenient foods, and 6 others are proposed across the borough. They also state that single story homes are needed in Wrea Green but only profitable two storey homes are being built. In addition, Wrea Green suffers with a shortfall in school places but this is regularly ignored when approving planning applications.

Council response

The council notes Highways England's comments which are addressed further under policy **INF1** in Chapter 12.

The council agrees with LCC's comment to amend the third paragraph of policy **HW2** to include the words '... no longer viable...'

In relation to LCC's comments on the potential need for additional primary school sites and a new secondary school, this element is covered under policy **M1** in Chapter 7 and in the **IDP**. The council understands that there is a potential requirement for additional primary school sites and an additional secondary school site, all of which depend upon the position and feasibility of expansion of existing schools at the time of delivery of these developments. The council agrees to continue close working with LCC on the provision of new school places and school sites through the Education Liaison Group meetings.

The council has confirmed the Lytham St Annes Cycle Group comment and will make the necessary changes within the RPO to reflect that it is the *Blackpool Teaching Hospitals NHS Foundation Trust* and not Lancashire Teaching Hospitals NHS Foundation Trust as stated.

In regards to the comments made by the Action Group, this policy and justification has been developed to protect allotments and community food growing schemes rather than retail convenience stores. In regards to school places, as paragraph **11.24** clearly states education provision is set out in the council's IDP. Furthermore, planning applications are considered on their own merits, case by case and LCC as the education provider are consulted on all major residential planning applications.

Recommendations for change

- Add an additional paragraph to policy **HW2** to read: 'A site for a new primary school will be reserved at Mowbreck Lane, in Wesham – as identified on the Policies Map - for the relocation of the CE Primary School on Garstang Road North, in Wesham.'

- Amend the third paragraph of policy **HW2** to read: ‘The loss of any community facilities will be resisted unless it can be demonstrated that the facility’s continued operation is no longer viable or needed, or can be relocated elsewhere in a location that is equally accessible by the community.’
- Change paragraph **11.13** to read ‘Blackpool’ Teaching Hospitals NHS Foundation Trust, instead of ~~Lancashire~~ Teaching Hospitals NHS Foundation Trust.
- Amend paragraph **11.24** to read: ‘It is projected that there will be a significant shortfall of school places in the Borough over the plan period and many schools, particularly within Lytham and St Annes, are already at capacity. The County Council, as the Education Authority currently holds a site off Mowbreck Lane, Wesham for the possible relocation of the Church of England primary school on Garstang Road North, Wesham. The site is identified on the Policies Map and is safeguarded for school purposes. Education services in Fylde are managed by LCC, which has identified a need for a new secondary school in the Borough. considers that there is a need for Fylde Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of the Local Plan. Further information on education provision is set out in the draft Infrastructure Delivery Plan (IDP), which ~~that~~ accompanies this ~~document~~ local plan.’

Policy HW3: Provision of Indoor and Outdoor Sports Facilities

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- Sport England

What you said

Sport England welcomed the fact that all previous suggested changes had been made, however they were unable to determine whether any proposed allocations are located on any existing playing fields. Sport England would object to any allocation that affects an existing or lapsed playing field unless the emerging Playing Pitch Strategy clearly demonstrates that the site is surplus to requirements. Or the policy specifies a replacement within the locality should be found that is an equivalent or better quantity and quality.

Council response

The council is aware of only one site, situated at Kirkham Grammar School, which is not a shared facility and before any development proposals come forward it would have to adhere and meet with the criteria as set out in policy **HW3**. Text changes have been recommended in policy **SL4** in Chapter 7 to cross refer this site to policy **HW3**.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 11 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **11.28** to read: 'Many community facilities are also sports facilities. Consequently, the delivery of such facilities ~~should be~~ is based upon the findings of the Built Facilities Review, prepared by Lancashire Sport Partnership in August 2015. The Facilities Review recommends the provision of indoor tennis centres in Fylde, together with approximately 113 more Health and Fitness stations, due to current under-provision. Policy ENV5 in chapter 14 covers outdoor open space; open space standards and contributions.'

Policy HW4: Contaminated Land

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations received were received in regards to policy **HW4**.

Recommendations for change

- None

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following sentence to the end of criterion a) in policy **HW4**: 'Any remedial work should be undertaken to the satisfaction of the local authority, ahead of the commencement of development (apart from that associated with the agreed remedial works);'
- Amend paragraph c) in policy **HW4** to read: 'Applicants will be required to provide details of ~~should address the physical capability of the land~~ remedial and mitigation measures to protect the high levels of biodiversity value on contaminated land, the ~~adverse effects of instability on the development, or of adjoining development on unstable land, and to protect the effects on (amongst other things) local amenities and conservation and heritage assets on the site~~ interests of the development and any remedial measures.'

CROSS CUTTING THEMES IN CHAPTER 11:

Number of representations:

Comment	Support	Object	Total
0	0	1	1

Representations received from:

- 1 Action Group

What you said

An Action Group questioned why concerns regarding public transport had not been heeded when planning applications have come forward for determination.

Council response

The council notes the Action Group's comments. The council considers that these issues are fully considered as part of the determination process.

Recommendations for change

- None

Chapter 12: Infrastructure, Service Provision and Transport

Chapter 12: General Comments

Number of representations:			
Comment	Support	Object	Total
2	0	1	3

Representations received from:

- Newton with Clifton Parish Council
- An Action Group
- 1 Resident

What you said

Newton with Clifton Parish Council are concerned that the borough's housing proposals will place an unacceptable pressure on existing infrastructure in respect of:

- a) Transport: i.e. highways, rail, bus, cycling &c.*
- b) Water: supply, wastewater and surface water drainage, flood defences and flood risk management.*
- c) Waste management: disposal and recycling.*
- d) Information and communications technology: telecommunications, broadband and cable television.*
- e) Education: nursery and pre-school, primary, secondary, further, higher, and adult education.*
- f) Energy: electricity generation and provision.*
- g) Health: hospitals, health centres / general practitioner surgeries and hospices.*
- h) Emergency services: ambulance, fire and rescue, police &c.*
- i) Green infrastructure: open space, parks, children's play areas, sports pitches and courts, country parks and accessible natural green space, allotments and burial facilities.*
- j) Community services: libraries, community centres, youth services, social services, older peoples support, special needs and disability &c.*
- k) Culture and leisure: museums and galleries, performance venues, sports and fitness centres.*
- l) Affordable Housing.*

An Action Group commented that the cross cutting theme on viability should be worked up.

A local resident commented on the benefits associated with cycling in terms of Promoting Health and Wellbeing and Achieving Good Design.

Council response

The council notes the comments on viability.

The Infrastructure Delivery Plan and associated Infrastructure Delivery Schedule itemises infrastructure projects already envisaged or probably needed after taking account of the quantum and broad location of all of the growth proposed in the Local Plan and to record the likely implementation timescale, costs and sources of funding and the current deficits - funding gap shortfalls (deficits) after taking account of monies already secured.

The council notes the resident's additional comments which are incorporated in the Infrastructure Delivery Plan and elsewhere throughout the Local Plan.

Recommendations for change

- None.

Policy INF1: Service Accessibility and Infrastructure

Number of representations:

Comment	Support	Object	Total
2	0	2	4

Representations received from:

- Highways England
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Action Group
- 1 developer

What you said

Highways England noted that this policy has been amended slightly and the overall policy provision remains the same. Their previous comments remain pertinent and the policy is supported.

Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs, however the services to go with the housing and communities are essential, including transport and roads as well as communications (including internet), shops, health services, leisure, community centres etc. Great care is needed to get this part of the plan right.

An Action Group raised matters of detail relating to a planning application that has been approved.

A developer commented on criterion b) of this policy which references mitigation of any negative impacts. They do not believe that this wording is compliant with the Framework as it is not positively prepared. Firstly the impact of viability on delivery of development should be considered. Secondly, if in such instances as the LPA are unable to show a 5 year housing land supply, national policy guides us to "grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." and in case of impacts on the Local Highway Network: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." That is to say not all negative impacts can be fully mitigated for, but this is not on its own a sufficient reason for refusal. It must be considered in context.

Council response

The council notes Highways England's support.

The council notes Blackpool, Fylde and Wyre Trades Union Council's comments. The comment relating to previous planning consents is also noted.

The council agrees with the developer to amend criterion b) of policy **INF1**, so that it is positively prepared.

Recommendations for change

- Amend criterion b) of policy **INF** to read: 'b) ~~Mitigate~~ Minimise any negative impacts...'

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following two new criteria to policy **INF1**: 'Mitigate any environmental impacts of new infrastructure provision;' and 'Use sustainable natural resources where appropriate;'

Policy INF2: Developer Contributions

Number of representations:

Comment	Support	Object	Total
3	2	3	8

Representations received from:

- Lytham St Annes Civic Society
- Bryning with Warton Parish Council
- Canal and River Trust (formerly British Waterways)
- 2 Developers
- 1 Action Group
- 2 residents

What you said

Lytham St Annes Civic Society stated that the M55 to Heyhouses Link Road is badly needed.

*A resident commented that policy **INF2** should clarify that developers cannot renegotiate their contributions on viability grounds unless there are genuine external changes to economic conditions.*

Bryning with Warton Parish Council supported this section of the Plan, but do seek clarification in respect of criterion f) as to what 'land and buildings' are, or could be available toward such infrastructure developments. The Parish Council has been advised by LEP and BAE that no land is being made available.

The Canal and River Trust (formerly British Waterways) welcomed the potential for developer contributions towards enhancing the functionality, quality, connectivity and accessibility of the Green Infrastructure network of which the Lancaster Canal is a part. Where appropriate the Trust would wish to seek developer contributions towards the mitigation of any impacts caused by development adjacent to the canal such as towpath improvements etc.

An Action Group questioned why the cost of independent verification is to be borne 'where necessary' and is not standard.

*Another resident commented that in relation to criterion d) of policy **INF2** that CIL monies should be pooled towards cycleway creation.*

A developer stated that whilst the council may find it viable to introduce a CIL charging schedule later in the plan period, this will not be immediate, creating a period of uncertainty. It is important, therefore, that the council identifies the likely development costs and funding mechanisms for infrastructure throughout the plan period, and how this may impact on

meeting the council's development needs, particularly for housing, in advance of the adoption of the Local Plan.

*A developer welcomed the use of the words 'subject to viability' and 'normally' in **INF2**. They also went onto state that this policy should clearly state that obligations will be sought for specific projects. This will ensure that the obligations are necessary, directly related, and fairly and reasonably related in scale and kind to the development.*

Council response

The council notes the support of the Lytham St Annes Civic Society for the M55 to Heyhouses (St Annes) Link Road.

The council considers that the last paragraph of policy **INF2** addresses the point regarding viability and any potential flexibility in the planning obligation.

In response to Bryning with Warton Parish Council and the proposed local service centre at Warton, paragraph **6.19** states that the proposed local service centre is to be on BAE Systems land. As referred to under policies **SL3** in Chapter 7 and **EC4** in Chapter 9, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

The council agrees with the resident to amend paragraph **12.20** in light of the recent changes to the CIL regulations on pooled contributions (Regulation 123), which came into force in April 2015.

The council notes the Canal and River Trust's (formerly British Waterways) and the house builder's support.

The council agrees to amend paragraph **12.23** so as to remove 'where necessary,' in respect of the cost of independent verification of financial appraisals.

In response to the developers comments it will be the role of the council's Section 123 List, developed as part of the Community Infrastructure Levy, to determine which projects and infrastructure receive monies.

Recommendations for change

- Add a new second sentence in paragraph **12.20** to read: 'In light of the CIL Regulations on pooled contributions (Regulation 123) which came into force in April 2015, Council's cannot collect more than 5 pooled contributions (from developments since April 2010) towards a single project or type of infrastructure not covered by a CIL infrastructure list/ charging schedule.'
- Amend the last sentence of paragraph **12.23** to '... appraisal. ~~where necessary.~~'

Policy T1: Strategic Highway Improvements

Number of representations:

Comment	Support	Object	Total
4	1	7	12 ⁶

Representations received from:

- Highways England
- Blackpool Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- Lytham St Annes Civic Society
- 1 Landowner Group
- 1 Action Group
- 2 residents

What you said

Highways England stated that a suitable evidence base is needed in order to consider the implications of new development on the safe and efficient operation of the Strategic Road Network; and that appropriate measures should be identified to support the proposed level of development. Highways England, in September, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report'. However, it is not clear whether the Council has developed this evidence further, beyond that initial assessment, that would enable Highways England to make further comments on the appropriateness of these improvements and whether they be sufficient, or whether other measures will be required in order to support the development and growth aspirations proposed in the Plan. The Assessment Report 'intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions'. It is considered that there is still a need to confirm the transport infrastructure requirements needed to support the Plan.

Blackpool Council commented that references to the Blue Route need to be updated to reflect the published Fylde Coast Highways and Transport Masterplan (July 2015) and the commitments within. Discussions need to be had with Wyre Council, Highways England and Lancashire County Council regarding the A585 Windy Harbour to Skippool scheme.

Greenhalgh with Thistleton Parish Council wished to see recognition of the acute problems of the A585 particularly between Windy Harbour and Junction 3 of the M55 and the A585 non-trunk link through the Kirkham Westerly by-pass from the A584 to junction 3.

Medlar with Wesham Town Council were concerned about the amount of traffic being routed onto the Kirkham and Wesham bypass, in particular along the A585 to and from the M55 (J3). The traffic lights have not been operational for 18 months and when they were they did not help the problem. No other remedies have been proposed. This problem will be further compounded when the Mill Farm complex and housing developments are completed.

An Action Group commented that many trains are already over-crowded and expensive to use. They also commented that the A584 is congested at peak times and that Blackpool Airport does little to contribute to connectivity. Furthermore they raised matters of detail relating to a planning application that has been approved.

Lytham St Annes Civic Society stated that the M55 to Heyhouses Link Road is badly needed.

A landowner group also supported the delivery of the M55 to Heyhouses (St Annes) Link Road. They agree with the policy which confirms that the Fylde-Blackpool Periphery Strategic Location for Development has good access to Junction 4 of the M55 and to the A583, while links to St Annes and Lytham will be improved by the construction of the M55 to Heyhouses (St Annes) Link Road. The Link Road will provide a direct north / south route across the moss linking the M55 Motorway and Lytham St Annes.

One resident commented that much of the highways infrastructure is inadequate to support the proposed developments in Kirkham and Wesham, Wrea Green and Warton. They are not convinced that the Preston Western Distributor Road will relieve much of the pressure on the rest of the network in rural Fylde. They state that there are no suggestions for the improvements to the A585 through Greenhalgh, Esprick and Thistleton, or the A585 between Junction 3 and A584.

Another resident also commented that they are surprised and disappointed that a bypass around Warton has not been provided.

Council response

It is considered that the RPO version of the Local Plan reflected the Fylde Coast Highways and Transport Masterplan, which was approved and adopted by LCC in July 2015. The council is required to continue to safeguard that part of the M55, junction 3 to Norcross, which lies within Fylde, until such time as it is advised to do otherwise. The Local Plan will refer to the most up-to-date position as is publicly available in regard to the Windy Harbour to Skippool major roads investment scheme.

The traffic congestion issues experienced along the A585(T) are acknowledged in the adopted Fylde Coast Highways and Transport Masterplan, 2015, which forms part of the Local Plan's evidence base. The congestion issues will, amongst other things, also be the subject of the North Fylde Connectivity Study which is due to be completed in 2016/17.

Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

The Local Plan has been formulated in conjunction with LCC, as Highways Authority. The Highways Authority has not suggested that a bypass around Warton is necessary through the plan making process, nor the various planning applications in the Warton area which they have been consulted on or involved in.

The council notes the comment relating to Blackpool Airport and attention is drawn to the word 'relatively'. The comment relating to previous planning consents is noted.

The council notes the support of the landowner group and Lytham St Annes Civic Society for the M55 to Heyhouses (St Annes) Link Road.

Recommendations for change

- At the time of publication - Reflect the most up to date position as is publicly available in regard to the Windy Harbour to Skippool major roads investment scheme.
- Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

Additional recommendations for change

The following additional change was proposed by County Highways (Transport Policy) to update the text in policy **T1** in Chapter 12 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend criterion b) of policy **T1** to read: 'The M55 to ~~Norcross—Link Road~~ Fleetwood Corridor improvements (i.e. the Blue Route); and'

- Amend the first two sentences of paragraph **12.36** to read: 'The Fylde Coast Highways and Transport Masterplan, July 2015 and the North Fylde Connectivity Study include reference to the M55 to Fleetwood Corridor improvements (~~formerly known as the Norcross Link Road~~ (i.e. the Blue Route), the route of which traverses land in both Fylde and Wyre. Fylde Council and LCC consider that the Blue Route should be safeguarded until an alternative highway solution is proposed to alleviate congestion on the A585.'

Policy T2: Blackpool Airport

Number of representations:

Comment	Support	Object	Total
3	1	0	4

Representations received from:

- Highways England
- Lancashire County Council
- Blackpool Council
- Treales Roseacre and Wharles Parish Council

What you said

Highways England noted that this policy has been significantly amended. The policy and these amendments continue to be supported.

Lancashire County Council commented that this policy must align with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.

Blackpool Council commented that references to Blackpool Airport throughout the Plan need to be updated to reflect the current situation and plans for the future.

*Treales Roseacre and Wharles Parish Council stated that policy **T2** and paragraph **12.40** should highlight the relationship Blackpool Airport, with the job targets associated with its new status as a LEZ and the required development to achieve this. This is to ensure there are no inconsistencies in pursuing the different activities proposed at and around Blackpool Airport and the LEZ.*

Council response

The council notes Highways England's support.

The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone. It will support the sustainable development of Blackpool Airport; create more businesses, jobs and attract international investment, with positive benefits across the wider economic area.

The council does not consider it appropriate to amend either policy **T2** or paragraph **12.40** as suggested by Treales Roseacre and Wharles Parish Council. Firstly, the Local Plan is to be read as a whole and each of these matters are to be addressed elsewhere in the Local Plan or the IDP. (The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone. It will support the sustainable development of Blackpool Airport; create more businesses, jobs and attract international investment, with positive benefits across the wider economic area). Secondly, the necessary infrastructure will deliver the Local Plan as a whole, not just the EZs.

All references to Blackpool Airport throughout the Plan will reflect appropriate plans for the sustainable development of Blackpool Airport, including work to explore the potential to develop commercial aeronautical activity.

Recommendations for change

- The Publication version of the Local Plan will be drafted to include a new policy in Chapter 9, regarding Blackpool Airport Enterprise Zone.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in policy **T2** which will appear in the Publication version of the Local Plan. It is not considered practical to illustrate the Airport Safeguarding Zone on the **Policies Map** as the notified area may be subject to further change during the plan period.

Additional textual changes

- Amend the last sentence of policy **T2** to read: 'Blackpool Airport, including Centrica's heliport will be consulted on all developments within the Airport Safeguarding Zones ~~which are shown on Figure 6~~ which will be shown on the Policies Map.'
- Amend paragraph **12.46** to read: 'All planning applications within the Airport Safeguarding Zone, ~~which will be shown on the Policies Map, accompanying the next version of the Local Plan~~ as shown on Figure 6 (or as subsequently amended), will be the subject of consultation with the operator of the airport. The Airport Safeguarding Zone around Blackpool Airport, incorporates Centrica's heliport. Elsewhere in the Borough, buildings over a notified height will also be the subject of consultation. There may also be restrictions on the height or detailed design of buildings or on development which might create a bird hazard.'

--

Policy T3: Enhancing Sustainable Transport Choice

Number of representations:			
Comment	Support	Object	Total
8	2	4	14 ⁷

Representations received from:

- Highways England
- Blackpool Council
- Lancashire County Council
- Lytham St Annes Civic Society
- The Trams to Lytham Team
- 1 Action Group
- 1 Resident

What you said

Highways England noted that policy T3 had been significantly amended and now includes reference to working with Highways England to deliver improvements to transport and infrastructure. The policy and these amendments continue to be supported.

Blackpool Council suggested that reference could be made in the Plan to the Rights of Way Improvement Plan.

Lancashire County Council stated that the extension of the Blackpool Tramway from the Promenade to Blackpool North station is now a committed scheme in the Lancashire Growth Deal.

Lytham Civic Society supported the proposed integration of different modes of transport, is being investigated.

An Action Group supported criterion j), and the inclusion of the park and ride at Kirkham and Wesham Railway Station, but noted that it includes no timescales. Comment was also made about the ability to enhance sustainable transport options and implementing planning conditions. They also stated that some existing cycle routes are unsafe.

The Trams Team to Lytham commented that a light rail system on the line between Squires Gate and Lytham by linking to Blackpool's tramway will solve many of the issues facing transport in Lytham and St Annes, and on the whole of the Fylde Coast. They urged the council to embrace a pro-transport agenda with a focus on light rail, and unlock the economic growth and improved user experience that it will bring.

*A resident commented that the Local Plan shows support in principle for cycling but lacks detail, definition or a programme of how things will be achieved and when. Proper, safe cycle ways, are currently being discussed with local schools and companies. They state that in relation to paragraph **12.50** that a definition of 'safe' needs to be included. They also state that **12.57** is incorrect in terms of the Fylde. There is almost no cycling off road, and even less that cyclists use or would use.*

Council response

The council notes Highways England's and Lytham Civic Society's support.

In respect of the Action Group's comments on criterion j) and the resident's on cycleways, the Infrastructure Delivery Plan and associated Infrastructure Delivery Schedule is the document where timeframes for project deliveries are set out. The additional comments made by the resident are noted.

The council will amend paragraph **12.52** in respect of the Blackpool Tramway.

In respect of the resident's and Blackpool Council's comment the council will include reference in the Plan to the Rights of Way Improvement Plan in paragraph **12.56** in Chapter 12 and paragraph **14.41** in Chapter 14.

The council note Trams Team to Lytham's comment.

Recommendations for change

- Amend the third, fourth and fifth sentences of paragraph **12.52** to read: 'The Fylde Coast is one of five regions where the project is evaluating available options, such as connecting the existing tramway to the ~~railway at Blackpool North, as well as the South Fylde line.~~ A light rail link to Blackpool North Station is the preferred scheme. The extension of the Blackpool Tramway from the Promenade to Blackpool North station is now a committed scheme in the Lancashire Growth Deal, subject to the business case demonstrating the scheme is value for money and the scheme promoter securing the necessary statutory powers to construct it. The project could cost £18 million, ~~and it will include Major Scheme Funding.~~'
- Amend criterion g) in policy **T3** by adding: 'tourism developments' after 'employment areas' and '... support, promote and implement innovative public transport initiatives;'

- Amend criterion h) in policy **T3** by adding the following text at the end of the sentence: 'on the South Fylde Line'
- Amend paragraph **12.56** to ..."cyclists and pedestrians. Many of these are identified in the Lancashire Rights of Way Improvement Plan. Further..."

Policy T4: Parking Standards

Number of representations:

Comment	Support	Object	Total
0	1	0	1

Representations received from:

- Highways England

What you said

Highways England noted that the policy has been amended with the addition of the first sentence and ensuring that car parking is provided wherever possible to ensure no detrimental effect on highway safety. This principle and amendment can be supported.

Council response

The council notes Highways England's support.

Recommendations for change

- None.

Chapter 13: Water Resource Management, Flood Risk and Addressing Climate Change

Chapter 13: General Comments

Number of representations:

Comment	Support	Object	Total
3	0	1	4

Representations received from:

- Marine Management
- 1 Action Group

What you said

The Marine Management Organisation submitted details of various statements and checklists the council may find useful, but made no specific comment to the RPO.

The Action Group suggested that no account has been taken of the rising water table on east Fylde.

Council response

Marine Management comments are noted.

The council disagrees with the comments made by the Action Group. The council are very aware of the issues in the east of Fylde and have repeatedly passed these concerns on to the Lead Local Flood Authority at LCC and the Environment Agency, as well as holding regular meetings of the Making Space for Water group and the Fylde Peninsula Water Management Partnership, where issues and concerns are raised and actioned by the relevant body.

Recommendations for change

- None

Policy CL1: Flood Alleviation, Water Quality and Water Efficiency

Number of representations:

Comment	Support	Object	Total
5	1	1	7

Representations received from:

- Lancashire County Council – Planning (LCC)
- Fylde Borough Council – Building Control Manager
- Lytham St Annes Civic Society
- National Farmers Union (NFU)
- 1 Action Group

What you said

LCC suggested changing the phrase ‘dealing with it’ in paragraph 13.15 to ‘managing’ as dealing with it implies that it will resolve all flooding issues of this type. LCC also consider it would be beneficial to include a section on the roles and responsibilities of riparian owners, as they often have responsibility for undertaking action. It should also be made clear that LCC does not have the power to undertake works on Ordinary Watercourses. Additionally, it would be useful to refer to LCC’s role in providing Land Drainage Consents, and that LCC are a statutory consultee in the planning process. In regards to paragraph 13.26 LCC will generally refuse land drainage consent applications which seek to culvert sections of ordinary watercourse, it may be useful to reference their policy on this.

In addition, LCC commented that policy CL1 and paragraph 13.35 should make reference to the SuDs hierarchy, which is a very useful way of illustrating how surface water on new developments should be managed. The reference to water course consent at point e) appears to be unnecessary, water course consent and ecology should be considered separately by the policy.

FBC, building control commented in regards to paragraph 13.31 – Flood Defences, and recommend the addition of text, so the paragraph reads.Policy CL1 therefore requires developer contributions through the CIL for the repair, maintenance, renewal or replacement of the coastal flood defences. Similarly for continuation purposes, paragraph 13.33 should read Developers contributions required under policy CL1 for the repair, maintenance renewal or replacement of the flood defences.

Lytham St Annes Civic Society supported the incorporation of green spaces within developments to manage surface water drainage.

The NFU commented that it is essential that any new development does not have a negative impact on the existing system, and that plans are in place for the long term maintenance of any new drainage systems.

The Action Group stated that sewage overflow now counts as flooding and needs to be considered.

Council response

The council notes LCC's comments. The SuDs hierarchy is already set out at policy **CL2** and in paragraph **13.37**. Consequently, there is no need to add text to policy **CL1** referencing the SuDs hierarchy or provide a further reference in paragraph **13.35**.

The council acknowledges comments made on behalf of FBC's Building Control Team and will amend the text in paragraphs **13.31** and **13.33** accordingly.

The council notes Lytham St Annes Civic Society's comments.

The NFU's comments are noted and the council will continue to work with its colleagues at LCC, Environment Agency and United Utilities to ensure adequate drainage systems are in place and maintained.

The council notes the Action Group's comments, however this issue is covered under the Joint Lancashire Minerals and Waste Local Plan.

Recommendations for change

- Amend the text in the second bullet point in paragraph **13.15** to read: 'Lancashire County Council (Lead Local Flood Authority and Highways Authority) – is responsible for dealing with managing surface water flooding ...'
- Add the following text in the second bullet point in paragraph **13.15** 'LCC also provide Land Drainage Consents and are a statutory consultee in the planning process.'
- In the third bullet point in paragraph **13.15** add the following text: 'Under Section 14A of the Land Drainage Act the council has the powers to undertake works to manage flood risk from ordinary watercourses.' In addition update the wording in **Table 6** to address this.
- Add additional text setting out the roles and responsibilities of riparian owners.
- Add the following text at the end of paragraph **13.24**: 'Farms can have an important role to play in flood risk management, e.g. the use of farmland for wetland or flood storage.'

- Add the following text in paragraph **13.26** to read '...to a watercourse. LCC will generally refuse Land Drainage Consent applications which seek to culvert sections of ordinary watercourse. Buffer strips ...'
- At the end of paragraph **13.26** add the following text: 'Further information can be found in LCC's 'Ordinary Watercourse Consenting and Enforcement Policy on LCC's website.'
- Amend the text in paragraph **13.31** to read '... developer contributions through the CIL for the repair, maintenance, renewal or replacement of the coastal flood defences'.
- Amend the text in paragraph **13.33** to read: '... under policy **CL1** for the repair, maintenance, renewal or replacement of flood defences...'
- Re-word part e) of policy **CL1** as water course consent and ecology should be considered separately by the policy.
- Add a new criterion (k) in policy **CL1**: 'Ensuring that farmland is used for wetland or flood storage.'

Policy CL2: Surface Water Run-Off and Sustainable Drainage

Number of representations:

Comment	Support	Object	Total
7	0	3	10

Representations received from:

- Lancashire County Council – Planning (LCC)
- Environment Agency (EA)
- United Utilities
- Bryning with Warton Parish Council
- 1 Developer
- 1 Action Group

What you said

LCC commented that policy **CL2** should quote the discharge hierarchy as set out in PPG paragraph **80** (Flood Risk and Coastal Change), which is more relevant to a planning document, rather than as set out in building regulations, which is currently used. Reference to the 'Non-statutory Technical Standards for SuDs' produced by Defra would be useful. LCC's SuDs: Local Specifications, Standards and Policies' will be adopted in 2016. Paragraph **13.37** refers to emerging hierarchy, this should be changed as it is now referenced in both Planning Practice Guidance and Building Regulations. LCC will require evidence to demonstrate that infiltration is not possible before other surface water discharge options will be approved.

LCC also recommended that it may be useful to reference in paragraph **13.43** the 'Climate Change Allowances for Planners' document produced by the EA.

The EA advised that it should be referenced within the document that surface water management now falls under the remit of LCC and their implementation should be in accordance with the principles of the emerging SuD's: Local Specifications, Standards and Policies' document. In addition they recommend that the implementation of SuDs is extended to significant refurbishments and/or redevelopment, and not just limited to new development.

Furthermore, in regards to paragraph **13.36**, the EA commented that although there are strong references to Bathing Waters etc. they have concerns about the lack of reference to shellfish waters, which should be concern for the council as there is a failing shellfish water (Ribble Estuary).

United Utilities recommended that the council amends the texts in parts **(1), (2) and (3)** to read 'Controlled discharge of rainwater...' to ensure developers are aware that this will not allow free flows. They also state that discharge rates should be agreed as part of any pre-application negotiations between the relevant parties.

Bryning with Warton Parish Council commented that concerns raised regarding sewerage and surface water drainage have been made on all major development sites, and failure to address these concerns will have significant long term implications, and that it is strange that these concerns of Warton and neighbouring parishes are not voiced in the justification summary.

One local property developer commented that the council should not seek to replicate the role of other statutory bodies as the burden of combined policy requirements can impact on the viability of developments.

The Action Group stated that sewage overflow now counts as flooding and needs to be considered, and refers to objections made to previous planning applications in Wrea Green.

Council response

The council notes LCC's comments. The SuDs hierarchy is already set out at policy **CL2** and in paragraph **13.37**.

In response to comments made by the EA, the council has taken these all on board and will review the wording of this policy and justification and make the appropriate changes to the RPO, as recommended.

The council agrees with the comments made by United Utilities and will make the relevant amendments and additions based upon their comments as outlined above.

The council will amend the text in parts **(1), (2) and (3)** as suggested by United Utilities and will also add a line of text within policy **CL2** in relation to discharge rates and pre-application discussions.

The council notes Bryning with Warton Parish Council's comments on wastewater matters.

The council disagrees with the comments made by the developer.

The Action Group's comments are noted, however this issue is covered under the Joint Lancashire Minerals and Waste local Plan.

Recommendations for change

- Add the following text at the end of paragraph **13.36**: 'There is a failing shellfish water (Ribble Estuary) which is of concern to Fylde Council.'
- Amend the third sentence in paragraph **13.37** to read 'There is an ~~emerging~~ national hierarchy to which surface water run-off is to be discharged.'
- Add the following text to paragraph **13.37** 'LCC will require evidence to demonstrate that infiltration is not possible before other surface water discharge options will be approved.'
- Add the following text at the end of paragraph **13.37**: 'which is referenced in Planning Practice Guidance (the PPG):'
- Add the following text at the end of paragraph **13.40**: 'As surface water management now falls under the remit of LCC, the implementation of SuDS should be in accordance with the principles in the emerging LCC SuDS Guidance document.'
- Refer to the 'Non-statutory Technical Standards for SuDs' produced by DEFRA.
- Amend the text at the end of paragraph **13.42** to read LCC's 'SuD's: Local Specifications, Standards and Policies' will be adopted in 2016.

- Add the following text at the end of paragraph **13.43**: ‘(‘Climate Change Allowances for Planners’, prepared by the Environment Agency).’
- Amend the text to reflect that the implementation of SuDs refers to significant refurbishments and/or redevelopment.
- Add the following sentence to the first paragraph in policy **CL2** ‘Discharge rates should be agreed as part of any pre-application negotiations between the relevant parties.’
- Add the word ‘Controlled’ to the beginning of each line in parts (1), (2) and (3) of policy **CL2**, e.g. ‘Controlled discharge of rainwater.....’

Policy CL3: Renewable and Low Carbon Energy Generation

Number of representations:

Comment	Support	Object	Total
3	1	3	7

Representations received from:

- Natural England
- BAE Systems Real Estate Solutions
- Treales Roseacre and Wharles Parish Council
- 1 Developer
- 1 Action Group

What you said

Natural England referred to solar development, and other development that reduces the amount of available land to SPA birds. The policy mentions mitigation, which is welcomed but where LSE is triggered in most cases the mitigation needs to be in place prior to development and as such this policy needs to be re-worded to reflect this.

*BAE Systems Real Estate Solutions welcomed the inclusion in criterion h) of policy **CL3** to safeguard BAE’s aviation and defence systems, in particular wind turbine developments should not be allowed in locations that could compromise BAE System’s flight safety systems. They also suggest that there is a specific policy which restricts development within the vicinity of the Warton Aerodrome.*

*Treales, Roseacre and Wharles Parish Council commented that paragraph **13.47** makes an incorrect statement that oil and gas prices are rising, and that we should make more use of hydrocarbon in the form of coal. They question that if development of on-shore wind energy generation in **Table 7** is consistent with current UK Government policy, how will it be delivered? The Plan appears to be silent on reduction in energy consumption, through insulation, energy efficiency and load management, which is a cheaper option.*

A developer supported the need to improve the carbon footprint of new development, but considered the council needed to ensure that requirements does not hinder viability of schemes.

An Action Group stated that as crops are being fed into anaerobic digesters there is now a shortfall of animal feed. Additionally, have the council considered wave power or even getting domestic clean water to drive mini-hydro generators? They also referred to a planning application in Wrea Green which has no bearing on this consultation exercise.

Council response

The council notes Natural England comments and amendments will be made to the wording of policy **CL3**. The majority of Natural England's comments have been dealt with in more detail as part of the responses report for the **HRA**.

The council notes Treales, Roseacre and Wharles Parish Council's comments. The council is working with Wyre and Blackpool Councils to commission an update to the LCC study on renewable energy and the outcome of this work will feed into the Local Plan.

The council notes BAE System's Real Estate Solutions comments, however, in the interests of delivering a flexible plan, the council does not consider that a separate policy is necessary. The council will continue to consult with BAE Systems over planning applications and comments made as part of that process will be taken as a material consideration in determining any planning application.

The council notes the comments made by the developer, however it considers that renewable and low carbon energy generation is achievable in all new development no matter the size.

The Action Group's comments have been noted, as stated in the RPO all types of renewable and low carbon generation will be considered.

Recommendations for change

- Add additional text to the paragraph after criterion i) in policy **CL3** to read: '....to the scale and type of development. However any proposed mitigation must be in place prior to the start of development.'

Additional recommendations for change

The following additional changes were proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following text at the end of criterion d) in policy **CL3**: Project-specific Habitats Regulations Assessments of any wind farm or solar farm developments near to the Ribble and Alt Estuaries SPA/Ramsar sites will be required, and these HRAs will need to demonstrate that there will be no significant effect on the qualifying features of these sites before they can be granted consent;

Policy CL4: Decentralised Energy Networks and District Heating System

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- 1 Developer

What you said

A developer objected as a major development includes sites of 10 homes or more and states that a 10 home' scheme cannot reasonably be expected to explore the potential for such systems.

Council response

The council notes the developer's comments, and although the policy reads 'Small scale decentralised energy schemes will be *encouraged* within new development...', for clarification purposes the council will amend the wording of the final sentence in paragraph **13.55** to refer to strategic development schemes comprising 100 or more homes or 1000m² of new industrial floor-space.

Recommendations for change

- Amend the final sentence in paragraph **13.55** to read: 'Delivering schemes will be more viable in new development, therefore the policy applies to ~~major~~ strategic development schemes only (100 or more homes or 1000m² of new industrial floor-space).'

Additional recommendations for change

The following additional changes were proposed to update the text in policy **CL4** to make it more robust and fit for purpose which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend policy **CL4** to read: 'All strategic ~~major~~ developments, ~~as defined by the Town and Country Planning (Development Procedure) (England) Order 2010 of 100+ homes,~~ will be required to explore the potential for decentralised energy supply and district heating / cooling systems. Strategic ~~major~~ developments located where a decentralised energy supply ...'

Chapter 14: Conserving and Enhancing the Natural, Historic and Built Environment

Chapter 14: General Comments

Number of representations:

Comment	Support	Object	Total
1	1	0	2

Representations received from:

- Historic England
- Campaign to Protect Rural England (CPRE) – Fylde District

What you said

Historic England had no comments to make on the content of the RPO at this stage.

CPRE – Fylde District commended the stated intentions to protect, conserve and enhance Fylde’s natural environment, in particular the landscape and coastal character and biodiversity assets. They also noted that an updated Open Space Study will be produced to inform the Publication version.

Council response

The council notes Historic England’s and the CPRE – Fylde District’s comments.

Recommendations for change

- None

Policy ENV1: Landscape

Number of representations:

Comment	Support	Object	Total
5	0	3	8

Representations received from:

- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 Landowner

- 1 Action Group
- 1 Resident

What you said

One resident although generally supportive of the policy, did not consider the policy strong enough as it states in paragraph 14.6 that the council will 'encourage' appropriate landscaping and does not consider that this has been enforced on developments around Warton.

*A landowner requested that the wording in criterion b) of policy **ENV1** be revised to accurately reflect the wording of the Framework. They have also asked that the phrase 'or any subsequent update' is added in reference to the Lancashire Landscape Character Assessment;*

Area of Tranquillity

The CPRE – Fylde District recommended a reference be made to its campaign to protect tranquillity, and to use its mapping to identify specific areas in the RPO. Furthermore, this section should be named Tranquillity only and the spelling changed. In addition, more description is required regarding what tranquillity is and the council should refer to tranquillity explicitly in policy.

An Action Group questioned that these areas will not be helped by 5-10 years of construction, and that a local business would breach all of the requirements set in this policy.

A resident, although generally in agreement with preserving the tranquillity of the countryside, did not know how the policy would seek to enforce its principles, as some outdoor sports are at odds with the concept.

Council response

In response to the resident's comment, the wording of 'encourage' is present in the justification paragraph and not specifically in the policy. Each planning application will be assessed on its own merits and any accompanying landscape scheme would be assessed fully in line with the policy aims.

The council does not agree that the wording in criterion b) of policy **ENV1** needs to be amended. However, it does acknowledge that the Lancashire Landscape Character Assessment may be updated within the plan period, so a caveat will be included.

Area of Tranquillity

The council notes the misspelling of 'Tranquillity' and it will be changed accordingly. However, the council disagrees with the CPRE – Fylde District that the title of this section needs to be changed. The council recognises further wording and clarification is required within the policy to satisfactorily protect Areas of Tranquillity.

The council notes the Action Group's comments. However, it is recognised that development will often create some noise and disruption during construction, and that existing businesses cannot be unreasonably restricted due to changes in nearby land uses, as stated in the Framework.

In response to the local resident, an Area of Tranquillity is defined as a place sufficiently far from the visual or noise intrusion of development or traffic to be considered unspoilt by urban influences, and unfortunately sports and recreation activities cannot be precluded from these areas.

Recommendations for change

- Spelling of 'Tranquility' amended to 'Tranquillity', throughout the text.
- Add and amend the following text in policy **ENV1** to read 'Development will be assessed to consider whether it is appropriate to the landscape character ~~type~~, amenity and tranquillity within which it is situated.....'
- Amend the second sentence in policy **ENV1** to read: '... Lancashire Landscape Character Assessment, December 2000 or any subsequent update.'
- Add the following text to the end of the second sentence in paragraph **14.8**: 'and the Catchment Flood Management Plan seek to manage run-off rates and minimise flood risk.'
- Make text changes to paragraphs **14.16 and 14.17** to make reference to what the definition of Tranquillity actually is.

Additional recommendations for change

The following additional changes were proposed to update the text on development in the countryside which will appear in the Publication version of the Local Plan; and by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Amend criterion a) in policy **ENV1** to read: 'by land ~~outside settlement boundaries in~~ the Countryside'
- Amend criterion iii) in policy **ENV1** to read: 'Does not adversely affect the nature conservation assets of the coastline, predominantly the Ribble and Alt Estuaries SPA/Ramsar. Project specific Habitats Regulations Assessments (HRAs) will be required

for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no significant effect upon European Sites before the tourism and coastal defence developments can be granted consent.'

Policy ENV2: Biodiversity

Number of representations:

Comment	Support	Object	Total
1	1	0	2

Representations received from:

- Natural England

What you said

Natural England welcomed the commitment to produce a Supplementary Planning Document on Biodiversity, and suggest it would be useful to add some text to the plan outlining the purpose of the SPD.

Council response

The council acknowledges Natural England's comments and will add text to paragraph **14.24** regarding the proposed SPD. The council will also work closer with Natural England on the scoping and development of this SPD.

Recommendations for change

- Add additional text in paragraph **14.24**, in regards to the proposed Supplementary Planning Document on Biodiversity and its purpose.

Additional recommendations for change

The following additional change was proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Add the following text to the paragraph after criterion i) in policy **ENV2**: 'predominantly the Ribble and Alt Estuaries SPA / Ramsar site.'
- Amend the text in policy **ENV2** to read: '...which ~~will be~~ are identified on the Policies

Policy ENV3: Development in the Nature Improvement Area

Number of representations:

Comment	Support	Object	Total
0	2	0	2

Representations received from:

- Canal and River Trust (formerly British Waterways)
- Campaign to Protect Rural England (CPRE) – Fylde District

What you said

The Canal and River Trust (formerly British Waterways) welcomed the recognition of the Lancaster Canal as a designated biological heritage site.

The CPRE – Fylde District commended the intension to define a 'Nature Improvement Area' in Fylde, and in the absence of any details would expect an Area such as this be produced in accordance with DEFRA criteria, with the involvement of the Local Nature Partnership.

Council response

The council acknowledges the Canal and River Trust (formerly British Waterways) comments.

The council agrees with CPRE – Fylde District to follow all relevant up-to-date legislation, in regards to Nature Improvement Areas, in accordance with DEFRA guidelines.

Recommendations for change

- None

Policy ENV4: Protecting Existing Open Space (the Green Infrastructure network)

Number of representations:

Comment	Support	Object	Total
4	1	0	5

Representations received from:

- Sport England
- Blackpool Council – Planning
- Canal and River Trust (formerly British Waterways)
- 1 Resident

What you said

Sport England commented that they had been unable to determine whether any of the proposed allocations are located on existing playing field or land last used as playing field. And that they would object to any allocation that affects an existing or lapsed playing field unless the emerging Playing Pitch Strategy clearly demonstrates the site is surplus to requirement.

Blackpool Council suggested that reference could be made in the Plan to the Rights of Way Improvement Plan.

The Canal and River Trust (formerly British Waterways) welcomed the recognition given to the Lancaster Canal as a Green Infrastructure.

*The resident suggested that green corridors, as well as access to recreational areas are all improved with proper kerbed designed cycle paths. This should be further detailed in the Plan to ensure no short cuts and bad designs are accepted by people not understanding cycling needs to a proper level. Cycling will encourage Green programmes and will reduce carbon emissions. Protected cycle ways will encourage more cycling and increase the Green footprint of Fylde. In addition policy **T3** must be pulled out by cycle groups and must be seen in the Plan as key in all planning and green thinking.*

Council response

In response to Sport England's comments, as part of a planning application process the appropriate statutory consultees will be consulted. In addition, the council has

commissioned KKP consultants to prepare a Playing Pitch Strategy and to update the Open Space, Sport and Recreation Study. The results and recommendations in the Playing Pitch Strategy and the updated Open Space Study should be available for the Publication version of the Plan.

The council agrees with Blackpool Council's comments and will make reference to the Rights of Way Improvement Plan, either in the justification section or in policy **ENV4**.

The council acknowledges the Canal and River Trust (formerly British Waterways) comments.

In response to the comments made by the resident, the council does not agree that specific details in regards to kerbed designed cycle paths are necessary within the Plan. Each planning application submitted would be assessed on its own merits and the relevant statutory body consulted to ensure the development is designed and built to the correct specifications. Cycle provision is also set out in detail in **section 2** of the **Infrastructure Delivery Plan** (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council consider that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- Add the following sentence at the end of paragraph **14.41**: 'LCC has prepared a Rights of Way Improvement Plan.'

Additional recommendations for change

The following additional changes were proposed to update the text in policy **ENV4** which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **14.38** to read: 'The Framework requires Councils to plan positively for the creation, protection, enhancement and management of biodiversity and Green Infrastructure. Despite an abundance of resources that contribute to the Green Infrastructure network, there are deficiencies in Fylde and access to some of the Borough's most important Green Infrastructure assets is limited ~~poor~~. New evidence ~~will be~~ has been provided from the updated Open Space and Recreation Study and the new Playing Pitch Strategy, both of which were issued in 2016. There is also the opportunity to improve the potential of some of Fylde's most important

assets and to link into Green Infrastructure network in neighbouring authority areas.'

- Amend the first sentence of paragraph **14.39** to read: 'Policy ENV4 seeks to protect existing open space (the Green Infrastructure network), as set out in paragraph **14.37** ~~14.39~~.'
- Amend paragraph **14.43** to read: 'An updated ~~of the evidence on the~~ Open Space and Recreation Study, together with a new Playing Pitch Strategy have been issued, ~~is currently underway to which have~~ informed the preparation of this Publication version ~~this Fylde Local Plan to 2032~~.'

Policy ENV5: Provision of New Open Space (the Green Infrastructure network)

Number of representations:

Comment	Support	Object	Total
5	0	1	6

Representations received from:

- 2 Developers
- 1 Resident

What you said

One developer commented that the provision of 100 plus homes was excessive and should be carefully considered against the viability of development as these could significantly impact the capacity of development sites, and stated that they did not feel that the supply in area generates this level of need in new development.

*Another developer objected to policy **ENV5** as it is reliant on evidence presented in the council's Open Space, Sport and Recreation Study 2008 and as such is not justified by up-to-date evidence, so the council's position is not aligned with the Framework and the policy is unsound.*

A resident considered this policy to be long term and would cost considerably for a relatively low use. But if the council focussed on large, wide, straight, flat urban roads, this will encourage cycling and make the coast path more viable due to local demand. While the Guild Wheel might go in the near future encouraging cycling as a tourist draw will be good for the Fylde but this will take more than a decade and will not show a return on investment to justify it in the next decade. A key point which links safe cycling to encouraging people into sport and achieving green objectives.

Council response

The council disagrees with comments made by both developers. Firstly, the policy quite clearly states that the council will be flexible in its approach to requiring new open space. Open space to be provided, or commuted payments to be made will be fairly and reasonably related in scale and kind to the development proposal. The requirement will be modified or even removed where it can be shown by the developer that there is an existing over-provision of open space in the locality.

Comments made by the resident have been noted, however, the Local Plan and its policies are not just about planning for the here and now but for the future of Fylde until 2032 and further. This policy will help secure funding for opportunities to create new open spaces and additional monies generated may also go to improving and enhancing existing open spaces and other Green Infrastructure linkages, including cycle networks in Fylde. Cycle provision is further set out in further detail in **section 2** of the **Infrastructure Delivery Plan (IDP)** and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council consider that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- None

Additional recommendations for change

The following additional change was proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Amend the second sentence in policy **ENV5** to read: 'Such safe green open space ...'

Policy ENV6: Historic Environment

Number of representations:

Comment	Support	Object	Total
3	0	6	9

Representations received from:

- The National Trust
- Lytham St Annes Civic Society
- 1 Action Group
- 1 Resident

What you said

The National Trust suggested that the wording related to Listed Buildings should be changed to read ...Fylde's Listed Buildings and their settings will be conserved and, where appropriate, enhanced. Any harm to or loss of the significance of a listed building ~~and~~ or its setting will be refused....

Lytham St Annes Civic Society were pleased to see that Character Appraisals and Management Plans for Conservation Areas are going to be prepared, and hope that these are at the beginning of the plan and not at the end.

The Action Group, made the following comments:

- *Question where the list for the heritage assets of local interest is?*
- *What are the two planned model rural settlements and why have these two villages been chosen?*
- *To allow Public Rights of Way and the views from them to be "Heritage Assets", and that to allow high hedges to "fence off" solar panel farms will erode these.*
- *Wrea Green has been awaiting for a Conservation Area appraisal since the Conservation Area was declared. What are the timescales for undertaking these?*

A resident commented that the council's failure to produce a local plan in a timely way has led to development or applications for development which are neither required nor desired. Therefore would like to see land at Dowbridge designated as an area of archaeological importance given that extensive roman remains may be hidden under the undisturbed surface.

Council response

The council will amend the text in line with the National Trust's comments, however the word 'or' will be added instead of removing the word 'and'.

Work has started on updating and producing Conservation Area appraisals, all of which will be in place and regularly updated and maintained within the plan period.

The council notes the questions and comments raised by the Action Group and provides the following response:

- The council is in the process of forming a Local List which will be completed well within the plan period.
- The two 'planned' model villages are Singleton and Thistleton, and are named such due to being developed as part of a large country estate. As such, as they were specifically 'planned'.
- As far as the council is aware there are no public rights of way in Fylde classed as Heritage Assets, and landscaping as part of a planning application will be assessed on its own merit.
- As stated above, work has started on updating and producing Conservation Area appraisals, all of which will be in place and regularly updated and maintained within the plan period, including the Wrea Green Conservation Area.

In response to the local resident's request for designating Dowbridge as an area of archaeological importance, it may be that after the council has completed its local list of Heritage Assets, further designations will be proposed.

Recommendations for change

- Change the text in the first paragraph under 'Listed Buildings' in policy **ENV6** to include the following wording: 'Any harm to or loss of the significance of a listed building and/or its setting will be refused'.

Additional recommendations for change

The following additional change is proposed to update the text in the Publication version of the Local Plan.

Additional textual changes

- Amend criterion 4) under 'Conservation Area' in policy **ENV6** to read: 'Not result in the loss of open space (the Green Infrastructure network);'

Chapter 15: Next Steps

Chapter 15: General Comments

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Chapter 15.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to be made to update the text in Chapter 15 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **15.1** to update the text for the Publication version, to read: 'The ~~Revised Preferred Option~~ Publication version of the new Local Plan will be available for you to view and to submit your representations regarding soundness to Fylde Council for six weeks in **July** and **August 2016** ~~15 October and 3 December 2015~~. To view the ~~Revised Preferred Option~~ Publication version document or for more information ~~and for details of the drop-in events~~, please visit www.fylde.gov.uk/localplan/ or contact the Planning Policy Team on Tel. 01253 658418 or email: planningpolicy@fylde.gov.uk.'
- Delete the sub-heading: '~~Public Events~~'
- Delete paragraph **15.5**: '~~The Planning Policy Team will host drop-in sessions during the seven week consultation period, providing information about the Revised Preferred Option version of the new Local Plan and the IDP. The drop-in sessions will also provide the opportunity for the public to come along and ask questions about the new Local Plan and the IDP and for guidance on submitting comments.~~'
- Amend paragraph **15.6** to read: '~~After the consultation into the RPO version of the Local Plan and the IDP, the Council will consider all of the comments received. The Council will also consider the findings of the technical assessments (the~~

~~Sustainability Appraisal, the Habitats Regulations Assessment, the Health and Equalities Impact Assessment, the Rural Proofing Assessment and the Viability Assessment) and any new evidence and changes to Government guidance. All of this information will be used to write this Publication Version which will form the final round of consultation on the Local Plan to 2032, following which the document will be submitted (i.e. the Submission version) to the Secretary of State, who will appoint an independent Inspector to carry out an Examination in Public (EiP) – i.e. a public inquiry - into the soundness of the document.'~~

DRAFT

Glossary and Appendices

Glossary

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to the Glossary

Recommendations for change

- None.

Additional recommendations for change

The following additional changes were proposed to update the Glossary in the Local Plan; together with amendments proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal to the RPO version of the Local Plan.

Additional textual changes

- Add the following text at the end of the definition of **'Affordable Housing'** in the Glossary: 'For the purposes of policy H4, in addition to **Registered Providers**, as defined in the Housing Act 2004, the Local Planning Authority will treat the delivery of affordable housing by a body which is not a Registered Provider, but is able to assure the Council that it operates to the same codes of practice as a Registered Provider.'
- Add the following definition in the Glossary: **'Flood Risk Management - The process of balancing the needs of flood defence with the needs of the environment and people.'**
- Add the following definition in the Glossary: **'Foreshore – The area between the lowest level of tide to the highest level of tide.'**
- Amend the following definition in the Glossary: 'Large Developed Sites in the Countryside - in open land outside settlement boundaries: Large developed sites ~~within open land outside settlement boundaries~~' in the Countryside, including HM Kirkham Prison Kirkham, Weeton Barracks Camp and Ribby Hall Village, but excluding farms and employment sites.

- Delete the following definition in the Glossary: ~~'Open Land outside settlement boundaries - Areas outside towns and rural settlements'~~ and replace throughout the plan with the following text: **'Land in the Countryside.'**
- Add the following definition to the Glossary: **'Natura 2000 sites - A network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive. The network includes both terrestrial and marine sites (Marine Protected Areas).'**
- Delete the following definition from the Glossary: ~~**'Phasing or Phased Development'** - The phasing of development into manageable parts. For example, an annual rate of housing release for large development that may need to be controlled to avoid destabilising housing markets and causing low demand.'~~
- Amend the following definition in the Glossary by adding the underlined text: **'Sub-region - An area covering more than one local authority area, i.e. Fylde Coast or Central Lancashire.'**

DRAFT

Appendix 1: Schedule of saved policies from the Fylde Borough Local Plan (As Altered), October 2005

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to **Appendix 1**

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to be made to **Appendix 1** to update the text and to amend the policy numbers which will appear in the Publication version of the Local Plan, following the recommendations in this Responses Report for the drafting of new policies and changing the order that policies appear in chapter 9.

Additional textual changes

- The title in the second column in the Table in **Appendix 1** to be amended to read: 'To be replaced by policies in the Fylde Local Plan to 2032 (policy numbers in the ~~Revised Preferred Option~~ Publication version)'
- Amend all references to policy **GD5** to read: 'Large Developed Sites in ~~open land outside settlement boundaries~~ the Countryside'
- Amend all references to 'Policy ~~EC4~~ EC2 – Employment Opportunities'
- Amend all references to 'Policy ~~EC2~~ GD8 – Demonstrating Viability'
- Add the following text to the second column relating to **CF2** – Site for a new school at Mowbreck Lane, Wesham: 'Policy HW2 – Community Facilities'
- Amend the text in the third column of the Table in **Appendix 1** to read: '~~NPPF~~ Paragraph of the Framework'

Appendix 2 Housing Trajectory

Number of representations:

Comment	Support	Object	Total
3	0	0	3

Representations received from:

- Bryning with Warton Parish Council
- 2 Developers

What you said

Bryning with Warton Parish Council commented that the Housing Trajectory should reflect the 800 permissions granted to date.

*A developer commented that **Appendix 2** of the RPO states that site **HSS1** – Queensway, St Annes will deliver 60-75 homes per annum between 2016 and 2032. The plan is unclear what assumptions are being applied by the council relating to the delivery rates of this site. It is understood that Kensington Developments intend to deliver the whole site alone. The council has not provided any evidence to the contrary. Our client considers the delivery of 60-75 homes per annum to be unrealistic for one developer. In reality it is more likely to be 30dph, delivery rates will also be slowed due to infrastructure requirements, in particular the M55 to Heyhouses Link road which does not have capital committed for its implementation. At a more realistic delivery rate at 30dpa it is expected that the site will deliver 630 homes over the plan period, therefore further sites should be allocated as part of the Local Plan.*

*A developer objected claiming that we do not expect 100-110 homes per annum to be delivered at the Whyndyke Farm site **MUS2** given the associated infrastructure requirements. This site will be developed by multiple housebuilders and it should be assumed that rates will be marginally decreased proportionately with each new additional developer to take account of the effects of market saturation. It is unlikely that the full 1,310 homes will not be delivered in the plan period therefore to meet the Objectively Assessed Need, further sites should be allocated.*

*A developer objected that site **HSS5** - Cropper Road West is not suitable for development as significant highway improvements to Cropper Road would be required, also the site is currently unavailable and in multiple ownership, no evidence has been provided that the site will be available in the long term. Market competition from other sites in the Fylde-Blackpool Periphery will dampen delivery rates.*

A developer raised concerns with the deliverability of the Strategic Locations for Development in Lytham St Annes and the Fylde-Blackpool Periphery and there is a lack of evidence as to how the council calculated their delivery rates. The failure of the delivery of

these sites would represent a fundamental failing of the plan, unless significantly greater provision is found through further allocations. `

Another developer commented that the council may wish to identify likely timescales for delivery through a trajectory but should not seek to stall sustainable and deliverable sites from coming forward, this will simply thwart development and will create difficulties for the council in achieving its 5 year supply of housing.

Council response

The council agrees that the housing trajectory in **Appendix 2** is out of date, it will be updated to a base date of 31st March 2016. All of the permissions which have been granted from 31st March 2015 to 31st March 2016 will be included in the trajectory.

The build out rates are included in the council's Five Year Supply Statement, and are included in the council's response to the Five Year Supply calculation. The lead in times to the commencement of completions and the build out rates were agreed with representatives of the development industry, including the proposed developers of Queensway, via the Strategic Housing Land Availability Assessment Steering Group. The proposed developers of Queensway have recently advised the council that they propose to complete the site in excess of the completion rates assumed in the trajectory.

Evidence provided by developers demonstrates that site **MUS2** - Whyndyke Farm will be delivered within the plan period. Indeed partners from the health service, LCC, YMCA, Blackpool and Public Health are pitching a bid to NHS England for Whyndyke Farm to be a Healthy New Town Pilot, even if the bid is unsuccessful the partners involved (including the developer) have made a commitment to ensure that this development will be designed to enable healthy living and healthy lifestyles.

With respect to site **HSS5** – Cropper Road West, highways improvements are required. The site is available, all of the landowners involved have formed a group and approached the council to say that they wish the whole site to be developed comprehensively.

No detail has been provided about the concerns with the deliverability of the Strategic Locations in Lytham St Annes and the Fylde-Blackpool Periphery. At Lytham St Annes the Heyhouses site has been built out and the former Pontins site is under construction. At the Fylde Blackpool Periphery there are also sites under construction east of Cropper Road and off Lytham St Annes way. When the trajectory is updated to a base date of 31st March 2016 it will be clear that there have been significant amounts of development in both locations.

With respect to the final comment. The council has not attempted to phase the delivery of sites, neither does it seek to stall sustainable and deliverable sites from coming forward. The lead in times for sites commencing and the build out rates were agreed by the SHLAA Steering Group which includes representatives of the development industry. The council will continue to use these assumptions.

Recommendations for change

- The housing trajectory set out in Appendix will be updated to a base date of 31st March 2016.
- The assumptions used with respect to lead-in times and build out rates will be cross- referenced at paragraph **10.15** by a cross reference to the Strategic Housing Land Availability Assessment (SHLAA).
- Another row of figures will be added to the housing trajectory with respect to dealing with the shortfall in housing provision moving forward from 2016.

DRAFT

Appendix 3: Retail Boundaries Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 3.

Recommendations for change

- None

Additional recommendations for change

The following additional change was recommended to update the text in Appendix 3, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the text for **Whitehills** under **New Local Centres** to read: '**Whitehills (Fylde-Blackpool Periphery Strategic Location for Development)** – This is proposed to have a new Local Centre by the end of the Plan period'.

Appendix 4: Holiday Area(s) Boundary Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 4.

Recommendations for change

- None

Additional recommendations for change

The following additional changes were proposed to update the text in Appendix 4, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the second sentence in Appendix 4 to read: 'There is no need to distinguish between Primary Holiday Areas as Secondary Holiday Areas were not taken forward in the Local Plan at the Preferred Option stage or the Revised Preferred Option stage'.
- Amend the text under North Promenade, St Annes in Appendix 4 to read: 'Holiday Area designation does not now apply ~~here~~ at North Promenade, St Annes'.
- Amend the first line under South Promenade, St Annes in Appendix 4 to read: 'The previous Primary Holiday Area at South Promenade, St Annes has been split into two smaller areas'

Appendix 5: Sea Front Area(s) Boundary Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 5.

Recommendations for change

- None

Additional recommendations for change

The following additional change was recommended to update the text in Appendix 5, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the last sentence of **Fairhaven Lake Sea Front Area, Ansdell / Fairhaven** to read: 'Rather, Fairhaven Lake ~~it~~ should be subject to policy ENV6: the Heritage Assets Historic Environment policy (ENV6) in Chapter 14.'

Appendix 6: Existing Employment Sites Review

Number of representations:

Comment	Support	Object	Total
1	0	1	2

Representations received from:

- Bryning with Warton Parish Council
- 1 Action Group

What you said

It was stated that the Land Registry site at Warton is referenced under Wrea Green.

Bryning with Warton Parish Council stated that Freckleton Boatyard, Warton is not considered suitable as an Employment site due to the extremely poor transport access to the site and distance from infrastructure facilities.

Council response

The council will amend the text relating to Land Registry, Warton so as to correct the typographical error.

At Freckleton Boatyard current uses fall within Use Classes B1(c) and B8. As an active boatyard, the only such facility in the Fylde section of the Ribble Estuary, it is recommended that the facility should be adopted as an employment area in the development plan. Such an allocation could limit appropriate uses in the area to boat building/boat repair and storage.

Recommendations for change

- Amend and move the following text in **Appendix 6** on page 264 which is currently under the sub-heading '**Wrea Green**' to the sub-heading '**Warton**' - 'Land Registry, Warton, ~~Wrea Green~~ - Active government office, which should be retained in employment use'.

Appendix 7: Biological Heritage Sites in Fylde

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 7

Recommendations for change

- None

DRAFT

Appendix 8: Performance Monitoring Framework

Number of representations: 0

Comment	Support	Object	Total
0	0	2	2

Representations received from:

- Blackpool, Fylde and Wyre Trades Union Council
- 1 Action Group

What you said

Blackpool, Fylde and Wyre Trades Union Council welcomed new development in Fylde, however they make the following comments:

- *Would like to see development works being carried out by local workers to provide income to local people and keep money in the local economy;*
- *The plan should not include any extension of fossil fuel extraction via the shale gas method, as it has increasingly recognised potential health and other risks associated with it;*
- *Social housing should be included to take account of local need and the dramatic drop in owner occupiers;*
- *There is a school and education deficiency and new development will bring further stresses on this, any new schools should be community schools and not academies or free schools.*

Overall there is some concern that the Key Indicators, claims to stick to things which are easily measured but do not properly face up to several of the key issues raised above.

The Action Group commented on the following indicators:

- *Indicator 1 – Target housing needs to be broken down by location, tenure and type;*
- *Indicator 3 – This may need to be adjusted of the Employment Vision does not come to fruition to prevent over-supply;*
- *Indicator 14 – Why just travel to work data? Given the high level of retired residents, are not most trips in relation to shopping and leisure?*
- *Indicator 15 – Some trains are already overfull – so that needs to be an indicator;*
- *Indicator 19c – Wrea Green has been waiting 17 years for its initial appraisal;*
- *Indicator 19d – when is the target date for establishing this list?*

Council response

In response to the comments made by the Blackpool, Fylde and Wyre Trades Union Council the council makes the following comments:

- The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of S106 when planning

permission is granted. It is not something the council would seek to influence through Local Plan policy. However, controlling and regulating this falls outside the council's remit to make it a policy requirement. There are instances where other local authorities have made it a provision/clause in their Procurement Framework, and as such it may be a consideration the council can discuss further as part of the organisation's remit.

- In respect to shale gas extraction, the impacts of shale gas exploration are still unknown. There are counter arguments for and against shale gas exploration and the industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.
- The council considers that policy **H4**, Affordable Housing, is a robust, sound policy which will look after the needs of local people.
- The council is aware of the need for additional education spaces and is working closely with the educational authority and, as such, the council will be taking its direction from them as the local education providers.

The council notes the comments made by the Action Group. The council will publish an Authority Monitoring Report (an AMR) on a yearly basis and these indicators will be used to assess and monitor various data to ensure policies are working effectively. There is no target date set for establishing a Local List of Heritage Assets, however the process has started and will be completed well within the plan period.

Recommendations for change

- The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of a S106 Agreement when planning permission is granted. It is not something the council would seek to influence through Local Plan policy. The council will investigate the possibility of introducing a clause within Fylde Borough Council's Procurement Framework to ensure that a certain % of local labour is used within any development it undertakes.
- To check that all data collected from the indicators is accessible and relevant to assessing individual policies.

Additional recommendations for change

The following additional changes are proposed to ensure the text is robust and up-to-date and it refers to the Publication version of the Local Plan.

Additional textual changes

- Delete the following paragraph in **Appendix 8** to update the text ready for the

Publication version: ~~‘There were 18 indicators in the Preferred Option version of the Local Plan. Indicators 11 and 13 and 17 from the Preferred Option version have been removed following representations received during the consultation into the Part 1 document in summer 2013. Four extra indicators have been added to the Revised Preferred Option version to ensure the robustness of the document, including: the retention of retail floor space in Lytham, St Annes and Kirkham town centres (new performance monitoring indicator 7); the retention of leisure, culture and tourism uses in the Island Sea Front Area (new performance monitoring indicator 8); the retention of serviced tourism accommodation in the Holiday Areas (new performance monitoring indicator 9); and to minimise the amount of inappropriate development in Flood Zones 2 and 3 (new performance monitoring indicator 16). Performance monitoring indicator 19 has been subdivided into 4 sections: 19a, 19b, 19c and 19d so as to monitor buildings at risk, the loss of listed buildings to development, the maintenance of up-to-date Conservation Area Appraisals and the publication of a local list of heritage assets’.~~

- Amend the subsequent paragraph in **Appendix 8**: ~~‘Consequently, there are now~~ **nineteen performance monitoring indicators** in the ~~Revised Preferred Option~~ Publication version of the Local Plan. This relatively small number of targets has been chosen for inclusion in the Performance Monitoring Framework so as to avoid duplicate, unreliable or difficult to collect indicators; to ensure that the indicators chosen align closely with the strategic objectives and the key planning policies and to focus on achievable targets in accordance with the Local Plan’s vision for Fylde. Indicators and targets have not been set out for every policy in the Local Plan’.
- Amend the title in **Appendix 8** to read: **‘Table 8: of Key Performance Monitoring Indicators against the policies in the Fylde Local Plan to 2032.’**
- Amend the text in the left hand column of the Table in **Appendix 8** to read: ‘Local Plan Policies – ~~Revised Preferred Option~~ Publication version.’
- Amend the text in the third column of the Table in **Appendix 8** to read: **‘Performance Monitoring Indicator(s)’**
- Amend the target / policy outcome under Indicator **3** in **Appendix 8** to read: ‘To deliver a minimum of **7,770 homes** over the plan period from 1 April 2011 to 31 March 2032.’
- Under Indicator **18** in **Appendix 8** amend the target / policy outcome text to read: ‘Net gains in indoor and outdoor sports facilities ~~pitches~~ and open space provision.’
- Under Indicator **19c** in **Appendix 8** amend the monitoring indicator(s) and target / policy outcome text to read: ‘Conservation Area Appraisals and management plans.’

DRAFT

The Draft Infrastructure Delivery Plan (IDP)

The Draft Infrastructure Delivery Plan (IDP): General Comments

Number of representations:

Comment	Support	Object	Total
14	1	8	23

Representations received from:

- Highways England
- Environment Agency
- Historic England
- Sport England
- Natural England
- Blackpool Council
- Lancashire County Council
- Bryning with Warton Parish Council
- Newton with Clifton Parish Council
- CPRE - Fylde District
- Canal and River Trust (formerly British Waterways)
- Lytham St Annes Cycle Group
- Lytham St Annes Civic Society
- Lytham St Annes Technology and Performing Arts College
- Newton Residents Association
- 8 Residents

What you said

*The Environment Agency made various detailed comments all of which include suggested specific wording change based upon revision to reflect the current situation, updating factual information, and minor amendments to text in the following paragraphs **3.51, 3.52, 3.53, 3.58, 3.64** and **3.7**.*

*Highways England noted references to improved transport infrastructure which are specifically mentioned in RPO Local Plan policies **H1** and **T3**.*

- **H1:** *They question what quantum of development has been used to underpin the transport infrastructure needs and proposals, to confirm that the infrastructure improvements proposed in the Plan and supporting IDP are appropriate and sufficient to accommodate all of the Plan's development and growth aspirations.*

- **T3:** They note that this policy has been significantly amended and now includes reference to working with Highways England to deliver improvements to transport and infrastructure. The policy and these amendments continue to be supported.

At this stage Historic England had no comments to make on the content of the IDP.

Sport England made comments relevant to progressing a CIL Charging Schedule and Regulation 123 list. They recommend the following:

1. The CIL list includes specific projects for sport facilities (indoor and/or outdoor) and not generic statements.
2. The statement clarifies that:
 - a. Mitigation for loss under Framework Paragraph 74 falls OUTSIDE of CIL; and
 - b. Clarification that S106 agreements will be used to secure new sports facilities needed to meet new demand arising from development for sports facilities (indoor and outdoor) where not already sought through the CIL (e.g. CIL may be used to fund a new leisure centre to meet growth in demand for swimming pool BUT S106's would be used to fund all outdoor sport).

Natural England raised issues of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would help to provide certainty that housing can be delivered during the plan period.

In particular they sought clarification as to what dialogue has taken place between the council and United Utilities with respect to proposed growth and required infrastructure, taking into account of recent Water Cycle Studies and the Infrastructure Delivery Plan. They state that it would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised HRA. Specific examples where there are considered to be uncertainties in the **Local Plan** are referenced as follows: **6.18, 7.2, 7.24 and 7.25.**

In relation to the IDP Natural England maintained that the engagement with United Utilities, referred to under paragraph **3.48**, needs to be addressed at this stage to ensure deliverability of the plan.

Water infrastructure capacity and supply impacts could have an impact on the deliverability of some allocations, which is therefore a soundness issue under the effectiveness test. It is critical to detail the provision that must be in place at this stage. However what is lacking is any detail on existing infrastructure and capacity and what future infrastructure is planned other than reference to possible detailed modelling. There must be viable options available in order to meet wastewater drainage demands otherwise there is concern that some sites

will not be delivered, resulting in an unsound plan. This detail must be in the HRA at this stage. Natural England therefore advises the following:

The HRA needs to identify the quantum of development within each wastewater treatment works catchment. The HRA at this stage must demonstrate that options are available to ensure wastewater from planned new development can be treated without adverse impact upon European sites. Natural England advises that further detail should be provided to explain how impacts should be avoided and/or mitigated for. This will give a higher level of confidence that the areas in question can be developed without resulting in adverse effects on European sites and are therefore deliverable.

Lancashire County Council made numerous detailed comments as follows:

- Paragraph 2.2 - the Fylde Coast Highways and Transport Masterplan is now adopted.*
- Paragraph 2.14 - it is unclear what the additional planned work at M55 J1 is.*
- The narrative on Blackpool Airport needs to be aligned with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.*
- 4.1 to 4.4 are unnecessary as the SPD is no longer publicised by the Council, and the text does not relate to infrastructure provision.*
- 4.5 - There is no reference to commercial or industrial waste in 4.5. Clearly there will continue to be a demand for waste management capacity from existing industries and businesses in Fylde, and any expansion or growth in industries promoted by the draft Plan will add to this demand. However, any waste or minerals infrastructure required as a result of the development of the Fylde Local Plan is more properly addressed through the Minerals and Waste Local Plan, a review of which is ongoing and will involve discussions with Fylde under the duty to cooperate.*
- Paragraph 6.7 – should make reference to making appropriate education provision and making the development sustainable.*
- Paragraph 6.9 – should make reference to Developers obtaining an accurate housing assessment which will identify the need for school places.*
- Comments are made in respect of policy M1 which are also relevant to the IDP. Paragraph 6.17 of the IDP needs to reflect the following: overall the housing provision set out in the Local Plan could bring forward the need for 6.5 additional primary forms of entry and approximately 787 secondary school places over the plan period. Depending on the position and feasibility of expansion of existing schools at the time of delivery of these developments there is a potential requirement for additional primary sites and an additional secondary school site. Given the scale of development, there may be a need to identify additional primary school sites. The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham; this site should remain within the Local Plan.*

Appendix B to Lancashire County Council's response includes specific technical information on education provision. This evidence presents the case for the statement made above.

- **Tables 3 and 4** – Update the Surplus School Places information with data from May 2015.
- Because no one development is likely to be of a scale to produce sufficient secondary yield for a new secondary school, there is a need for Fylde Borough Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of this plan. We have been party to initial discussions in connection with the identification of a secondary school site in Warton and welcome the opportunity to take these discussions forward.
- The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham. Currently this site should remain within the Local Plan.
- There are a number of inaccuracies in the table on page 67 relative to its key:
 - The A585 Skippool – Windy Harbour scheme is in the current Road Investment Strategy so should be shaded dark orange.
 - The Preston Western Distributor is committed, subject to a business case demonstrating value for money and completion of statutory processes, so it should be shaded dark orange.
 - Blackpool to Preston electrification will not be completed by December 2015 but by May 2017.
 - The Blackpool to London rail service is shaded as uncertain yet it has been delivered.

In addition to the above Lancashire County Council (LCC) submitted comments which related to an earlier informal draft of the IDP. This informal consultation with infrastructure providers supported by the Development Management (Policy) Committee at its meeting on 17 June 2015. All of LCC's suggested changes and corrections were incorporated in the IDP (September 2015) which was consulted on between Thursday 15 October and Thursday 3 December 2015. Those earlier comments are not reported as part of this responses report as they are not relevant to the consultation version IDP. Only outstanding issues relevant to the consultation version IDP are reported here.

Lytham St Annes Technology and Performing Arts College questioned the validity of the school places data that has been used. The College has 1,391 pupils on roll, meaning there is a capacity of 272 places. They also make reference to the fact that the school has just opened additional provision for post 16 students with Blackpool and the Fylde College utilizing their Ansdell site. The IDP does not appear to take account of this. In effect this has already increased capacity for post 16 students in the area - with a view to ultimately providing 500 places. It is believed that this information substantially reduces the demand for another secondary school in the area.

Blackpool Council have made specific comments in relation to Transport, Primary and Secondary Schools and Health and Social Care which are referenced as follows:

- **Transport**

Paragraphs **2.17** and **2.18** will need updating to reflect Lancashire County Council's impending decision to remove subsidies from a number of bus routes across Lancashire, with the possible termination of those routes by the operators.

Paragraphs **2.23/2.24**: It might be useful to refer to the position relating to rail (and tram) linkages in these paragraphs. Rail accessibility is poor for the sites around the M55 junction, but Squires Gate Station lies within the Blackpool Airport Corridor and is accessible to sites **HSS4** and **ES5**; and the Blackpool tramway can be accessed at nearby Starr Gate.

- **Primary and Secondary Schools**

The IDP acknowledges that there are cross boundary issues in terms of school places generated from development at the Fylde-Blackpool Periphery and that there are currently no LCC primary schools within Fylde that would serve this catchment. It also acknowledges that there is pressure on primary school places in Blackpool. The IDP states that the S106 agreement in place for Whyndyke Farm will provide for a new primary school serving the Fylde-Blackpool Periphery.

Whilst the proposed new school will help to address some of the primary educational needs arising from the new development, there may still be pressure placed on Blackpool schools. Therefore, it remains vital that further discussion takes place between Fylde, Blackpool and Lancashire County Councils, as part of the Duty to Cooperate, in order to address the cross-boundary educational issues that may arise from development at the Fylde-Blackpool Periphery. It is suggested that reference to involving Blackpool Council (as well as LCC) could be made in the 'Next Steps' paragraph of the Education section of the IDP.

- **Health and Social Care**

The IDP states that in terms of GP provision, the strategic sites at the Fylde Blackpool Periphery are more closely related to Blackpool than Fylde and that it is anticipated that residents would use facilities such as the new Primary Care Centres at South Shore and Whitegate Drive, with some using services in Kirkham or St Annes. However, there is no reference to a health centre at Whyndyke Farm, which is listed as part of the outline application proposals. Is this still likely to be developed as part of the scheme?

Bryning with Warton Parish Council suggested that the commitment to create green routes for Warton should be included in the **Appendix 2** table. They also made comments relating the construction of the Preston Western Distributor Road and possible localised congestion issues and the wider economic ramifications.

Bryning with Warton Parish Council noted that paragraph **2.15** of the IDP acknowledges increased traffic throughout the term of the plan. In doing so Fylde Council finally accepts the concerns persistently voiced by the Parish Council and local community yet it seems from this statement that negligible planning consultation with the County Council has been carried out to review options in advance of the draft plan.

Bryning with Warton Parish Council supported paragraph 7.53 of the Local Plan which references improved facilities at Warton and traffic congestion created by development being partially resolved by developer funded measures. They actively encourage Fylde Council to fully engage with the Parish Councils and local communities in prospective developer's proposals toward necessary amendments in road infrastructure plans.

Bryning with Warton Parish Council commented that there seems to be a major misconception that the provision of immediate local housing is necessary to support the work force of a major employer like BAE Systems. This obviously supports a developer's view point in building homes but it is really a very archaic view point that seems to have no basis of evidence to support it. BAE Systems at Warton have an actual low percentage of workers who live in the immediate area. In all likelihood academic evidence would dictate that skilled workers have no need or particular desire to live in close proximity to their work place and are quite prepared to commute routinely if possible. Naturally access to regular and reliable public transport is an important factor in the equation as well as frequent traffic congestion for private vehicles but the option of having a satellite parking site and a site to site company busing scheme could alleviate problems for the long term plans to reduce traffic flows.

Newton with Clifton Parish Council stated that infrastructure enhancements are already required locally and in the wider Fylde area. They go on to list an extensive range of existing infrastructure and services which they consider will be placed under unacceptable pressure because of the LPA's housing proposals.

CPRE - Fylde District commented on the need to reference provision of a park-and-ride scheme for Kirkham and Wesham station under RPO Local Plan Strategic Objective 3. They go on to state that the previous 2013 draft of the Infrastructure Delivery Plan (Reference 5) gave details of the scheme being considered, including a scheme layout. (2.35/2.36). The scheme would remove the disused northern by-pass line, the site being wholly within Northern Rail's ownership. However, we are concerned that consideration of a scheme has been 'watered down' in the updated Infrastructure Delivery Plan (Reference 6).

The Canal and River Trust (formerly British Waterways) commented that reference to British Waterways within the IDP should be amended to The Canal and River Trust (formerly British Waterways) which replaced British Waterways in England and Wales in 2012.

The Lytham St Annes Cycle Group wished to be recognised as a designated partner with regard to specific cycling proposals (and any other proposals with a potential cycling related dimension).

Lytham St Annes Civic Society have stated that the M55 to Heyhouses Link Road is badly needed.

Newton Residents Association and several individual residents have submitted the same comments relating to school places and health and social services. It is noted that paragraphs 6.18 and 6.29 acknowledges that two primary schools in the Treales area are close to capacity; and that other schools in Kirkham are over capacity. Given the amount of

development proposed, concern is raised as the demands on schooling could not be met with expansion of the local primary schools capability and capacity. Expansion of the Newton Bluecoat primary school would further exacerbate the traffic congestion and parking problems already experienced during school drop off and pick up times. 7.18 is noted as stating that Primary Care Centre provision in Kirkham has not been future proofed. These services are inadequate to meet need, let alone any further development in Newton (strategic or not).

A number of residents referred to infrastructure and services in Warton and Kirkham which they have concerns about. The IDP is lacking information about infrastructure which will be placed under pressure including doctors, dentists, pharmacy, primary schools and car parking.

Council response

The council agrees to amend the IDP to take account of the Environment Agency's comments, thereby reflecting the most up-to-date position. This will include amendments to the following paragraphs as set-out below: **3.51, 3.52, 3.53, 3.58, 3.64 and 3.77**.

Highways England's comments are addressed under RPO Local Plan policy **H1** in Chapter 10 and policy **T3** in Chapter 12.

The council notes Historic England's and Lytham St Annes Civic Society's comments.

Relevant to Sport England's comments, the Draft Infrastructure Delivery Schedule does not provide a definitive or exhaustive list of available funding sources and infrastructure costs. It has been prepared to support the development of a CIL Charging Schedule and focuses only on the infrastructure that might use CIL funding. It will be used to develop a draft Regulation 123 List which sets out infrastructure projects that the council intends to fund in whole or in part from CIL. Subsequent to the findings and recommendations of the new Playing Pitch Strategy, the updated Open Space Study and the Facilities Review, it will be possible to identify defined projects for inclusion in the Infrastructure Delivery Schedule.

In response to Sport England's comment 2.a. it is not felt appropriate to state in the IDP that 'Mitigation for loss under Framework paragraph 74 falls OUTSIDE of CIL'. The IDP relates to the provision of new and improved open space. The council considers it more appropriate to amend Local Plan policy **HW3**: Provision of Indoor and Outdoor Sports Facilities, criterion 1.b) in respect of improved alternative provision; which is dealt with under policy HW3 in Chapter 11.

In response to Sport England's comment 2.b. the continuation of Planning Obligations through Section 106 agreements alongside CIL is addressed in paragraph **1.22(2)** of the IDP. For the purposes of clarity the council will amend paragraph **11.3** of the IDP to make it clear that S106 agreements need not only relate to on-site provision of infrastructure. This principle applies to all infrastructure, not just sports facilities. Furthermore, Local Plan Policy INF 2 Developer Contributions, criterion e) will be amended to include specific reference to indoor and outdoor sports facilities, which is dealt with in Chapter 12.

Natural England's specific examples referencing paragraphs **6.18**, **7.2**, **7.24** and **7.25 of the Local Plan** are addressed in the relevant sections of the Responses Report.

The council confirms that United Utilities have been consulted as part of the plan making process. A further approach will be made to United Utilities to request detailed modelling work - to assess the ability of wastewater from planned new development to be treated and ensure there is infrastructure capacity to do so. This modelling work will hopefully address the uncertainties raised in terms of how much growth impacts on what sewerage system; and specifically what improvements are needed.

The number of additional school places needed will be confirmed with Lancashire County Council based upon the most up to date position. In so doing, specific attention will be drawn to comments made by Lytham St Annes Technology and Performing Arts College. In the interim the council will amend the IDP to take account of Lancashire County Council's comments as referenced above. This will include amendments to the following paragraphs as set-out below: **2.2**, **2.14**, **2.44**, **4.1 - 4.5** inclusive, **6.7**, **6.9**, **6.17**, **6.23**, **6.28**, **Tables 3** and **4** and **Appendix 2**.

The council will amend the IDP to take account of Blackpool Council's comments, thereby reflecting the most up-to-date position, as advised. This will include amendments to the following paragraphs:

- **2.18** in respect of subsidies to bus services.
- **6.31** with regard to provision of cross-boundary educational issues that may arise from development at the Fylde-Blackpool Periphery.
- **7.9** to refer to the inclusion of a Class D1 Health Centre at Whyndyke Farm. Reference is already made to this in paragraph **7.26 of the RPO** in respect of the outline planning permission for the mixed use scheme which amongst other things includes 1,310 homes in Fylde.

Strategic Objective 3 in Chapter 4 of the RPO version of the Local Plan will be amended to reflect CPRE - Fylde District's comments in that part of the Local Plan. The council has contacted colleagues in public transport at Lancashire County Council and Network Rail so as to confirm the certainty of the Park and Ride scheme for Kirkham and Wesham station. If this scheme is to be delivered within the lifetime of the Local Plan (up to 2032) ideally the council needs to be in a position to include the specifics of the scheme and identify the site boundary on the **Policies Map**.

The council will amend all references to British Waterways in the Local Plan so that it reads: 'Canal and River Trust'.

It is not possible to recognise the Lytham St Annes Cycle Group as a designated partner. They are an end-user rather than a delivery agency. They will however be consulted on all relevant future projects and schemes.

The council does not consider it appropriate to refer to the specific commitment to create green routes for Warton in the **Appendix 2** table. It is suggested that paragraph **2.57** is amended so as to refer to the Lancashire Rights of Way Improvement Plan. The Fylde Coast Highways and Transport Masterplan contains details relating to two projects, namely the Fylde Coast Cycle Network; and the Public Rights of Way creation and enhancement. Both of these projects are included in the table in **Appendix 2**. Lancashire County Council are currently preparing a 10 year Lancashire Cycling and Walking Investment Strategy. Bryning with Warton Parish Council's suggestion regarding green routes for Warton has been forwarded to Lancashire County Council for possible scheme identification as part of that.

It is understood that the project team responsible for implementing the Preston Western Distributor Road undertook detailed traffic modelling work as part of its planning and design. This would have considered possible congestion issues on the local highway network.

In respect of paragraph **2.15**, Lancashire County Council has been actively engaged throughout the plan making process. They are a formal partner under the Duty to Co-operate and have been consulted both informally and formally in developing policy. This relationship is set to continue.

The council notes Bryning with Warton Parish Council's support for paragraph **7.53** of the Local Plan. The comment about the provision of immediate local housing is noted.

Newton with Clifton Parish Council, Newton Residents Association's and Warton residents' comments are noted and it is intended that the Publication Version IDP will address the impact upon infrastructure and services associated with proposed development. It will not necessarily seek to make good existing deficiencies in their own right.

Recommendations for change

- Amend paragraph **2.2** in the IDP to read: 'In July 2015, LCC ~~has also adopted prepared the draft~~ Fylde Coast Highways and Transport Masterplan, which had been ~~was~~ issued for consultation in January and February 2015.'
- Amend paragraph **2.14** in the IDP to read: '~~Further work is planned at junction 1 of the M55 at Broughton, Preston to overcome traffic congestion at peak times, in addition to the improvement works which took place in 2013.~~ Works at Jjunction 32 of the M6, have improved the northbound link between the M6 and the M55, by forming a 5 lane motorway over a limited stretch of the road. Highways England has confirmed that significant development in the vicinity of Jjunction 4 of the M55 (i.e. the Fylde-Blackpool Strategic Location for Development) would not have a major significant impact on Jjunction 1 at Broughton.'

- Amend 2nd sentence of paragraph **2.15** to read: ‘...will continue to work...’
- Delete the existing text in paragraph **2.18** and replace with the following: ‘Bus routes are generally provided by commercial operators who determine the route and frequency of services. As Fylde is predominantly a rural borough with a relatively low population, bus services are often infrequent and some areas are not served by public transport. LCC has formally advised the bus operators that the bus service subsidies will cease on 2 April 2016. These local bus services are registered with the North Western Traffic Commissioner. It will be for the operator to either deregister the services with the Traffic Commissioner after 2 April 2016 or determine whether they could continue to provide some service in the area, without any level of subsidy from Lancashire County Council. LCC has asked operators if they could confirm their intentions as soon as possible on this matter. When information about potential service coverage is known, LCC will forward details of those services, whole or sections, which LCC are anticipating not to be provided, to other operators to establish if there are alternative commercial opportunities to maintain some level of service in an area. Following these discussions with bus operators, LCC would then be in a position to advise residents where conventional bus services would no longer operate and what, if any, mitigating action that can be taken to access or develop any potential Parish or Community Bus or Community Transport based transport schemes.’
- Amend the opening words of paragraph **2.44** in the IDP to read: ‘Blackpool Airport and its associated Enterprise Zone ...’
- Amend the third sentence paragraph **2.57** to read: ‘...Fylde, as identified in the Lancashire Rights of Way Improvement Plan, especially...’
- Amend paragraph **3.51** in the IDP to read: ‘~~Whilst bathing water quality on the Fylde Coast has improved significantly over the past 20 years, in 2010 and 2011 the quality has started to decline. None of the bathing waters meet the forthcoming revised Bathing Water Directive standards.~~ However, United Utilities completed the Preston Tunnels scheme in February 2014, improving unsatisfactory intermittent discharges within the Ribble Estuary. As a result, an evidence case was approved to assess St Annes and St Annes North bathing waters on bathing water quality data collected since the improvements. The case was accepted. In 2014 both bathing waters met and exceeded the minimum Bathing Water Directive standards achieving a classification of Good. In 2015 this was maintained at St Annes, with St Annes North achieving Excellent.’
- Amend paragraph **3.52** in the IDP to read: ‘~~In 2015 a revision to the The revised Bathing Water Directive came into force. It introduced higher standards for bathing water quality, and has a requirement for public information about water quality to be available at all bathing waters.~~ introduces higher standards, and has a requirement for public information about water quality to be available

~~at all bathing waters.~~ If bathing waters do not meet the stricter Directive standards, there is a requirement to erect signs advising of the quality of the bathing waters. This could have detrimental impacts upon local tourism and the economy.'

- Amend the opening sentence of paragraph **3.53** in the IDP to read: '~~There are many contributors towards the decline in bathing water quality.~~ Bathing water quality can be impacted by contributors.'
- Amend the penultimate sentence in paragraph **3.58** in the IDP to read: 'An AMP6 project at Clifton Marsh WwTW will ensure that the WwTW is adequately sized ~~is currently adequately sized~~ for the potential future development that could occur in Fylde Council and Preston City Council.'
- Amend paragraph **3.64** in the IDP to read: '~~To inform the business case for the next~~ United Utilities is now progressing Asset Management Plan (AMP6). UU is assembling information to submit to Ofwat by identifying future supply and demand needs across the North West in relation to water supply and wastewater.'
- Amend paragraph **3.77** to read: The council will continue to provide input into the Fylde Peninsula Water Management ~~Group and the Making Space for Water Group Partnership~~ Partnership as the Local Plan progresses, and will utilise the partnership groups to ensure that the Local Plan deals with surface water flooding and bathing waters issues effectively.
- Delete paragraphs **4.1** to **4.4** inclusive. Amend existing paragraph **4.5** in the IDP to read: 'Thornton Waste Recovery Park, in Wyre, treats 225,000 tonnes of household waste each year from the three Fylde Coast Authorities administrative areas and other parts of Lancashire. The Waste Recovery Park processes all waste indoors, making it the UK's first fully enclosed waste treatment facility. Liaison with LCC indicates that the proposed ~~level of~~ quantum and distribution of ~~growth~~ development identified in the ~~Revised Preferred Option~~ Publication version of the Local Plan does not raise any significant waste capacity issues, and the facilities at the Thornton Waste Recovery Park have sufficient capacity to deal with this scale of development. There will continue to be a demand for waste management capacity from existing industries and businesses in Fylde and any expansion or growth in industries promoted by the draft Local Plan will add to this demand. However, any waste infrastructure required as a result of the development of the Fylde Local Plan is more properly addressed through the Minerals and Waste Local Plan, a review of which is ongoing and will involve discussions with Fylde under the duty to co-operate.'
- Amend the last sentence of paragraph **6.7** in the IDP to read: 'that ~~the development is viable~~ necessary and appropriate education provision is made and the development is sustainable.'
- Add the following sentence to the end of paragraph **6.9** in the IDP: 'Developers

should obtain an accurate housing assessment which will identify the need for school places.'

- Amend paragraph **6.17** in the IDP to read: 'LCC has taken steps to provide additional places at three primary schools in Lytham St. Annes in the last few years to address an increase in the demand for primary school places created by an increased birth rate and new housing development. The provision of additional primary school places are prioritised in Lancashire's Strategy for the Provision of School Places and Schools Capital Investment. In relation to primary schools, LCC's preference is to expand existing schools, where they are physically capable of being extended. ~~There will also be demand for an additional secondary school in the borough within the lifetime of the Plan and a site for a new secondary school will need to be identified.~~ From the information in the housing trajectory in Appendix 2 of the Local Plan, the development sites could bring forward the need for 6 ½ additional primary forms of entry and approximately 787 secondary school places over the lifetime of the plan. Given the scale of development, the need to assess the feasibility of existing sites for expansion and the fact that a 1 ½ form of entry primary school has been included within the Section 106 Agreement for the Queensway development at St Annes, there may be a need to identify additional primary school sites. Because no one development is likely to be of a scale to produce sufficient secondary yield for a new secondary school, there is a need for Fylde Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of the Local Plan.'
- Amend **Table 3: Surplus Primary School Places** and **Table 4: Surplus Secondary School Places**, by updating the January 2013 with data from May 2015.
- Amend the last sentence of paragraph **6.23** in the IDP to read: 'LCC is working with Fylde Council to ensure that ~~an appropriate site for sufficient a new~~ secondary school places are ~~is~~ provided within throughout the plan period.'
- Add the following sentence at the end of paragraph **6.28** in the IDP: 'The current adopted Fylde Local Plan lists a requirement for a primary school site off Mowbreck Lane, for the possible relocation of the CE Primary School on Garstang Road North, in Wesham. Currently this site should remain within the Local Plan.'
- Amend the first sentence of paragraph **6.31** in the IDP to read: 'The council will work with LCC and Blackpool Council to determine in more detail whether existing school provision would meet the education impact from the developments proposed in the ~~Revised Preferred Option~~ Publication version of the Local Plan.'
- Add the following after the second sentence of paragraph **7.9**: Outline planning permission has been granted for 1,310 homes at Whyndyke Farm. The mixed use development also includes the provision of a new health centre. Once the health centre is delivered, residents in the Fylde-Blackpool Periphery will be able to attend the doctors' surgeries at Whyndyke Farm.

- Subsequent to the findings and recommendations of the new Playing Pitch Strategy, the updated Open Space Study and the Facilities Review: Update the IDP paragraphs **9.2** - **9.10** and the associated Infrastructure Delivery Schedule / developing Regulation 123 List.
- Amend the first sentence of paragraph **11.3** to read 'Both off-site and on-site...'
- Amend the first entry in **Appendix 1** – Green Infrastructure – Green Corridors Table to read '...British Waterways/The Canal and River Trust...'
- Amend **Appendix 2 – Infrastructure Delivery Schedule** by updating the highway schemes to reflect the correct colour scheme in the key: – dark orange, orange or yellow – denoting 'Committed capital programmes, or those that are secure or ongoing developments; uncertain capital available, or uncertain timescales; or projects that have had funding removed, but are still required, or are longer term aspirations.'

Additional recommendations for change

The following additional changes are proposed to update and amend the text so as to ensure that the Infrastructure Delivery Plan (the IDP) is up-to-date, robust and fit for purpose and in response to recommendations made by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal.

Additional textual changes

- Amend the title of the document to read: 'The Infrastructure Delivery Plan (IDP) accompanying the Publication version of the Local Plan'
- Amend text in paragraph **1.2** in the IDP to read: 'a minimum of 7,770 new homes between 2011 and 2032' and replace the word 'growth' with 'development' in this paragraph and throughout the Infrastructure Delivery Plan.
- Amend text in the first sentence in paragraph **1.2** in the IDP to read: 'so as to enable the level-of-growth quantum and distribution of development ...' and repeat this throughout the IDP.
- Amend paragraph **1.19** in the IDP to include the following text: 'the ~~Revised Preferred Option~~ Publication version of the Local Plan ...'
- Amend paragraph **1.20** in the IDP to include the following text: '~~and a~~ A Facilities Review ~~was will also be~~ undertaken by Lancashire Sport Partnership in August 2015...'
- Amend the opening sentences of paragraph **1.21** in the IDP to read: '~~It is~~

~~anticipated that the~~ The council ~~will begin~~ has commenced the development of a CIL ~~after alongside consultation on the Revised Preferred Option version of the Local Plan. The preliminary draft charging schedule is currently out for consultation alongside the Publication version.~~ The CIL will comprise an adopted charging schedule and a Regulation 123 List of infrastructure projects ~~or areas.~~

- Amend paragraph **1.24** in the IDP to read: 'Information received from infrastructure and service providers during this consultation into the draft IDP will ensure that is up-to-date and robust ~~before~~ prior to the EiP into the Local Plan, which is scheduled to take place in January 2017.'
- Move text on 'M55 (Junction 3) to Norcross Link Road (The Blue Route)' up to paragraph **2.6** in the IDP and move the text on the 'A585 Skippool – Windy Harbour Improvements' to follow it. Amend the sub-heading before paragraph **2.6** to read: M55 (Junction 3) to Fleetwood Corridor Improvements ~~Norcross Link Road~~. The new paragraph **2.6** should read: 'There is significant traffic congestion on the A585(T) at peak times, and development proposed in the emerging Wyre Local Plan and Wyre's adopted Fleetwood-Thornton Area Action plan will place additional pressure on this route. There is a long standing proposal to build a dual carriageway road to connect a new junction on the M55 east of Peel Hill to the Victoria Road roundabout on the A585(T) between Thornton and Cleveleys. This scheme, formerly known as the ~~The proposed 'blue route' (M55 Junction 3 – Norcross Link Road)~~ would alleviate this traffic congestion and would improve north-south road links north of the M55 and enhance accessibility to and from Fleetwood. Fleetwood is still officially classified as a port and has commercial sailings linked to the offshore energy sector. The route is not presently shown as being safeguarded in an adopted Development Plan. The A585 Corridor Study will look at the scale and scope of the problems on the A585(T) and set out how they could develop over the next ten years or so.'
- Existing paragraph **2.8** should become paragraph **2.7** in the IDP and read: 'The southern section, which lies within Fylde, comprises the A586 Garstang Road East to M55 between Junctions 3 and 4. This section would comprise a new junction on the M55 to the east of Junction 4 at Peel Hill and a new 7.5km dual carriageway link to the A586 Garstang Road East to the west of Little Singleton. The funding for the ~~Blue R~~oute is uncertain. The cost is estimated to be around £150 million at 2012 prices but this could rise to £200 million, taking account of inflation. If the blue route was to go ahead, funding could not be obtained within the lifetime of the Fylde Local Plan. Nevertheless, the Local Plan should show the route as a protected line, at least until the Multi-Modal Study presents its findings. The County Council is undertaking a specific North Fylde Coast Connectivity Study which is looking at the scale and scope of the problems on the A585(T) and it will look at the wider issues that are intrinsically linked to the operation of the A585(T).'
- Delete the existing text in paragraph **2.18** in the IDP and replace with the following: 'Bus routes are generally provided by commercial operators who

determine the route and frequency of services. As Fylde is predominantly a rural borough with a relatively low population, bus services are often infrequent and some areas are not served by public transport. LCC has formally advised the bus operators that the bus service subsidies will cease on 2 April 2016. These local bus services are registered with the North Western Traffic Commissioner. It will be for the operator to either deregister the services with the Traffic Commissioner after 2 April 2016 or determine whether they could continue to provide some service in the area, without any level of subsidy from Lancashire County Council. LCC has asked operators if they could confirm their intentions as soon as possible on this matter. When information about potential service coverage is known, LCC will forward details of those services, whole or sections, which LCC are anticipating not to be provided, to other operators to establish if there are alternative commercial opportunities to maintain some level of service in an area. Following these discussions with bus operators, LCC would then be in a position to advise residents where conventional bus services would no longer operate and what, if any, mitigating action that can be taken to access or develop any potential Parish or Community Bus or Community Transport based transport schemes.'

- Add the following sentence at the end of paragraph **2.23** in the IDP: 'Rail accessibility is poor for sites around Junction 4 of the M55.'
- Add the following text at the end of paragraph **2.24** in the IDP: 'Squires Gate railway station lies within the Blackpool Airport Corridor and is accessible to sites **HSS4** and **ES5**; and the Blackpool tramway can be accessed at nearby Starr Gate.'
- Delete paragraph **2.48** in the IDP and re-number the subsequent paragraphs: '~~A plan for the regeneration of Blackpool Airport is currently being produced which will set out how the airport can best be developed now that it is no longer operating as an international airport.'~~
- Amend existing paragraph **2.49** in the IDP to read: 'The council will work with other agencies ~~seek~~ to ensure that the improvements are made to surface access (public transport) to Blackpool Airport from surrounding areas and other transport nodes. ~~need for a Surface Access Strategy at the Airport is included in the Local Plan.'~~
- Amend the site reference in paragraph **3.21** in the IDP to read: '~~**HSS1**~~ **MUS4**: Heyhouses Lane, St Annes (MP)'.
- Amend paragraph **3.34** in the IDP to read: 'The completion of ~~the part~~ 98% of the superfast broadband project that covers Fylde is expected in March 2018 ~~2015~~'.
- Amend paragraph **7.3** in the IDP to read: 'GPs in Fylde are mainly located in the Key Service Centres ~~urban settlements~~ of Lytham, St Annes and Kirkham. However, a Primary Care Centre is available at both Freckleton (Local Service Centre) and Ansdell (part of Lytham), which has GP provision. Great Eccleston, just

outside the borough boundary in Wyre, also has a health centre with GP provision.'

- Add the following sentence at the end of paragraph **7.9** in the IDP: 'Outline planning permission has been granted for 1,310 homes at Whyndyke Farm, which includes the provision of a new health centre. Once the health centre is delivered, residents in the Fylde-Blackpool Periphery will be able to attend the doctors' surgeries at Whyndyke Farm.'
- Amend the last sentence of paragraph **7.10** in the IDP to read: 'The majority of Warton residents currently use these Primary Care Centres in Freckleton and Lytham.'
- Amend paragraph **9.1** in the IDP to refer to the preparation of a new Playing Pitch Strategy and an update to the Open Space, Sport and Recreation Study in 2016.
- Amend paragraph **9.4** to include references to the premier pitch facilities at Blackpool Road and Park View Playing Fields.
- Delete existing paragraph **9.5** in the IDP and re-number the subsequent paragraphs: ~~'The Open Space, Sport and Recreation Study, 2008 provided an update on the playing pitch position of the borough. This shows that the only significant change in demand related to football pitches, for which demand had reduced.'~~
- Amend paragraph **9.7** in the IDP to read: 'It is anticipated that the CIL will be an important funding mechanism for the provision of required pitches and facilities, through the charging schedule and the Regulation 123 list.'
- Amend paragraph **9.10** in the IDP to read: 'According to KKP's analysis of demand, Fylde is significantly under-provided in terms of fitness provision, both in terms of current and future demand. ~~It is anticipated that the CIL will be an important funding mechanism for the provision of required indoor sports facilities.~~ The Facilities Review, prepared by Lancashire Sport Partnership in August 2015, recommends approximately 113 more Health and Fitness stations, together with the provision of indoor tennis centres in Fylde due to current under-provision. It is anticipated that the CIL will be an important funding mechanism for the provision of required indoor sports facilities.'
- Additional text is to be inserted in paragraph **9.13** about library services and after paragraph **9.14** on Arts, Museums and Performance Venues in Fylde; and in paragraph **9.19** about Lytham Park Cemetery.
- Amend paragraph **9.21** in the IDP to read: 'The council are engaged with LCC to determine what additional childcare and library services are required to support the ~~level of growth quantum and distribution of development set out identified in the Revised Preferred Option Publication~~ version of the Local Plan.'

- Amend the last sentence of paragraph **10.2** in the IDP to read: ‘Lowther Gardens, Ashton Gardens, Lytham Green, ~~and~~ the grounds of Lytham Hall and Singleton Hall also provide opportunities for recreation and tourism. It is important that these assets are maintained and enhanced.’
- Amend the first sentence of paragraph **10.2** in the IDP to read: ‘The River Wyre and Lancaster Canal also contain important habitats along their lengths ...’
- Add the following three bullet points to the end of paragraph **10.3** in the IDP:
 - ‘DCLG Coastal Communities Fund
 - LEP Growth Fund
 - Natural England Coastal Access’
- Amend the last two sentences of paragraph **10.4** in the IDP to read: ‘Elsewhere in the borough, the maintenance of parks, recreation grounds and amenity open spaces has been passed over to the town and parish councils, and in these areas contractors carry out work on behalf of the parishes. ~~At Kirkham, the town council employs Fylde Council to carry out grounds maintenance works.~~’
- Amend the first sentence of paragraph **10.5** in the IDP to read: ‘Ashton Gardens has ~~recently~~ undergone a major refurbishment and this was funded through a Heritage Lottery Fund grant of £1,436,000, as well as additional funding towards a total project cost of just under £2 million.’
- Amend paragraph **10.8** in the IDP to include the following: ‘the provision of one site – comprising a country park of at least 60 Ha in size, at a suitable location that is accessible to the whole borough.’
- Amend the second sentence of paragraph **10.10** in the IDP to read: ‘The ~~7.5 km~~ 18 mile coastal strip from Starr Gate to ~~Freckleton Marshes~~ Savick Brook has been identified by the council as a priority for Green Infrastructure investment.’
- Amend the second sentence of paragraph **10.12** in the IDP to read: ‘The project, which will be completed in 2017, aims to improve the 24 Ha that are classed as a Site of Special Scientific Interest (SSSI), of which 16 Ha is an LNR, by means of:’
Add the following five objectives: ‘The five objectives of the Fylde Sand Dunes Management Action Plan are:
 1. Enhance the nature conservation value of the sand dunes and other natural coastal habitats such as shingle and saltmarsh areas.
 2. Increase the area of sand dune and saltmarsh habitats where appropriate
 3. Maintain and, where appropriate, enhance sea defences, with natural accretion of sand dune.
 4. Promote knowledge, understanding and appreciation of the ecological value of the sand dunes and other natural coastal habitats, and of their key role in coastal flood defence.
 5. Enable safe recreational use of the dunes and beach where this does not

significantly compromise the nature conservation or flood-defence properties of the dunes and other natural coastal habitats.'

Add the following two sentences after the five objectives: 'Natural England has reclassified the SSSI as 'favourable improving'. Funding for a further 5 years is being sought by the council.'

- Amend the first sentence of paragraph **10.13** in the IDP to read: 'There is a recognised deficiency of trees and woodlands in the borough. LCC is undertaking a county wide scheme of community woodland creation through the Lancashire Woodland Project over a 20 year period.'
- Amend paragraph **10.14** in the IDP to read: 'Policy ENV4 of the ~~Revised Preferred Option~~ Publication version of the Local Plan supports opportunities to extend the Public Rights of Way network where this improves access to key Green Infrastructure assets, including areas of Green Belt, ~~and the two proposed Areas of Separation,~~ the Coastal Change Management Areas (formerly Areas of Open Coastline) and the Lancaster Canal towpath. The Lancaster Canal is an under used asset and there is potential to develop this tract of Green Infrastructure (i.e. green and blue space) into a linear tourism and recreation asset.'
- Amend paragraph **10.15** in the IDP to read: 'Policy T3 facilitates the provision of additional footpaths, cycleways and bridleways where appropriate. LCC is the authority responsible for carrying out public rights of way creation and enhancement. LCC is working with Fylde Council in creating a coastal path from Starr Gate to Savick Brook, in line with recommendations in the Coastal Strategy.'
- Amend the first sentence of paragraph **10.16** in the IDP to read: 'The updated Open Space, Sport and Recreation Study, 2016 identifies a deficiency of allotments at Lytham, St Annes, Freckleton and Warton.'
- Amend paragraph **10.17** in the IDP to read: 'The updated Open Space, Sport and Recreation Study, 2016 identifies gaps in the provision of children's play areas at Lytham (0.04 Ha), Kirkham and Wesham (0.04 Ha) and the rural areas (0.12 Ha). The study recommends new provision in these areas. The delivery of new homes in the four Strategic Locations for Development will result in the provision of additional children's play areas on-site serving new and existing communities in Lytham and at Queensway in St Annes, Kirkham and Wesham and Warton; and new communities in Whyndyke and Whitehills in the Fylde-Blackpool Periphery.'
- Amend paragraph **10.18** in the IDP to read: 'The council ~~is currently~~ has updated ~~updating~~ the Open Space, Sport and Recreation Study, in time for the EiP. The ~~Study is will~~ Study ~~provides~~ provides up-to-date evidence of the open space requirements of the borough.'
- Amend **Appendix 2 – Infrastructure Delivery Schedule** by using up-to-date text from the Fylde Coast Highways and Transport Masterplan, the Regeneration Strategy and the Coastal Strategy.



DRAFT

Sustainability Appraisal

Sustainability Appraisal: General Comments

Number of representations:			
Comment	Support	Object	Total
4	0	2	6

Representations received from:

- Natural England
- Historic England
- Environment Agency
- Blackpool Council
- 2 Developers

What you said

Natural England agreed with the conclusions reached in the SA. The SA clearly outlines both negative and uncertain impacts. Natural England notes there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further in the next iteration of the SA as avoidance and/or mitigation measures may be required in order to reduce harm to the environment. As more information becomes available the findings should become more refined.

Historic England had no comments to make on the Sustainability Appraisal or the Habitats Regulations Assessment.

The Environment Agency requested that the last sentence of paragraph 4.2.1 - Water, 1st bullet (page 20) should be updated to include shellfish waters. The Environment Agency suggests: '...including bathing waters and shellfish waters.'

The Environment Agency requested that paragraph 4.2.1 - Water, 5th bullet (page 20) should be revised to reflect the current situation. The Environment Agency suggests: 'Bathing water quality has improved. This is due to the recently completed storm sewage storage scheme in Preston which stores storm sewage in large tanks and then passes this forward for treatment at Preston WwTW after the event. Recent changes in bathing water legislation has resulted in more stringent standards. Poor management and proliferation of non-mains drainage systems, as well as agricultural run-off during rainfall, can have an adverse effect on bathing water quality.'

The Environment Agency commented that - Table 4-2: SA Objectives, Indicators and Targets – 13. (page. 31) - 'To achieve compliance with Bathing Water Directive Guideline Standards' – this comment is now out of date and should be revised. The Environment Agency suggests:

'To meet the minimum requirements (Sufficient) or better of the Bathing Water Directive at all monitoring points.'

The Environment Agency requested that paragraph 7.2 - Point 2, 6th bullet (page 41) - should be updated to include shellfish waters. The Environment Agency suggests: '...and improving bathing water quality and shellfish waters'

The Environment Agency requested that section Table 9-3: Non-Strategic Sites Sustainability Appraisal Framework and Rationale – 13 (page 71) of the table should include the protection and improvement of shellfish waters.

The Environment Agency requested that section Table 11-1: Outline Monitoring Framework – Protect and enhance the quality of the water environment and reduce the risk of flooding (page 114) of the table should include shellfish waters.

The Environment Agency requested the list of 'indicators... used to ascertain baseline water environment conditions and key trends' should also make reference to shellfish waters in Appendix B – Environmental and Sustainability Baseline (starts page 251 of PDF) Section D. Water Bullet pointed list (page 6).

The Environment Agency requested that paragraph 5 (page 7) should be revised to reflect the current situation. The Environment Agency suggests: 'Bathing water quality is monitored at two European designated bathing waters in Lytham St Annes during the bathing season (1st May to 30th September). The results for the season are compared to the standards set out in the Bathing Water Directive. Recent changes to bathing water legislation has resulted in more stringent standards. In 2014 both bathing waters met and exceeded the minimum Bathing Water Directive standards achieving a classification of Good. In 2015 this was maintained at St Annes, with St Annes North achieving Excellent.'

The Environment Agency requested the paragraph on Key Issues and Opportunities – 5th bullet (page 7) should be revised, as the use of SuDS would be more appropriate to the management of clean surface water rather dealing with non-mains drainage systems. The EA suggests: 'Bathing water quality has improved. This is due to the recently completed storm sewage storage scheme in Preston which stores storm sewage in large tanks and then passes this forward for treatment at Preston WwTW after the event. Poor management and proliferation of non-mains drainage systems, as well as agricultural run-off during rainfall, can have an adverse effect on bathing water quality.'

The Environment Agency requested where 'Fylde Peninsular Waste Water Management Group' is mentioned in the documents provided including Section P. Transboundary Issues – 5th bullet (page 31) should be changed to 'Fylde Peninsula Water Management Partnership' throughout.

Blackpool Council noted that an updated Sustainability Appraisal assessing the implications of the policies proposed had not formed part of the consultation into the RPO version of the Local Plan.

A developer commented that there were serious concerns about the soundness of the plan, in light of the fact that the supporting Sustainability Appraisal was made available part way through the consultation period and fails to properly assess the chosen option.

A developer objected claiming that the sustainability appraisal is not adequate to meet the legislative requirements of the plan making process; the assessment of reasonable alternatives, especially at Warton, is not wide enough and does not assess all reasonable alternatives; and the abdication of Strategic development locations at Warton to the neighbourhood plan fails to meet the SA requirements of this plan making process, and as such is fundamentally flawed. It is inadequate and fails to fulfil the assessment requirements of the regulations, thus making the plan as a whole unsound.

Council response

The council notes Natural England's support for the conclusions reached in the Sustainability Appraisal (SA); and the need to explore the negative and uncertain effects in the next version of the SA as avoidance and/or mitigation measures may be required.

The council notes that Historic England had no comments to make on the Sustainability Appraisal.

The council agrees with the textual changes to the Sustainability Appraisal proposed by the Environment Agency and will forward the proposed changes to the consultants Arcadis (formerly Hyder) who carried out the Sustainability Appraisal into the RPO version of the Local Plan.

The council agrees with Blackpool Council's and a developer's comments that the HRA did not form part of the consultation into the RPO version of the Local Plan from 15th October to 3rd December 2015, but it was issued for consultation for a 6 week period from 23rd November 2015 to 5th January 2016.

The council also notes a developer's comments that the HRA failed to properly assess reasonable alternatives, and deferred the identification of strategic development locations at Warton to the neighbourhood development plan. Following the inspector's decision into the Blackfield End Farm Inquiry, which resulted in additional homes being allowed at Warton, the council has agreed to redraft policy **SL3** in Chapter 7 to include all existing commitments.

Recommendations for change

- The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the Sustainability Appraisal, requesting the need to explore the negative and uncertain effects in the next version of the SA as avoidance and/or mitigation measures may be required.

- The council will forward the textual changes proposed by the Environment Agency to the consultants Arcadis (formerly Hyder Consultants) who carried out the Sustainability Appraisal into the RPO version of the Local Plan, for inclusion in the next iteration of the Sustainability Appraisal.
- Redraft policy **SL3** in Chapter 7 to include the existing commitments in Warton from the start date of the Local Plan.

DRAFT

Habitats Regulations Assessment – Screening Report

Habitats Regulations Assessment: General Comments

Number of representations:

Comment	Support	Object	Total
4	0	2	6

Representations received from:

- Natural England
- Historic England
- Environment Agency
- Blackpool Council
- 2 Developers

What you said

Natural England advised that further detail should be provided to explain how should impacts be avoided and/or mitigated for at this stage; the plan is not at an early stage as indicated. This will give a higher level of confidence that the areas in question can be redeveloped without resulting in adverse effects on European sites and are therefore deliverable. Whilst Natural England appreciates that the full details of all schemes may not be yet fully known, it would still be beneficial to explore how the predicted effects can be resolved at project stage to provide further certainty that projects will be deliverable at the planning application stage.

Natural England requested further detail on the measures that will be taken to avoid potential impacts as result of the Strategic Locations for Development. The HRA outlines that re-wording of the Policy will be required, however no further detail is provided in the policies in terms of the proposed re-wording. The HRA needs to be able to confidently conclude no LSE, not just that potential effects could be resolved through the recommended changes. As much detail needs to be considered as possible at this stage in the plan to ensure the deliverability at project level.

Natural England maintains that the conclusions in the HRA need to be based on a robust detailed assessment. The overall conclusion reached in the HRA is that, assuming appropriate mitigation and compensation measures are implemented at the project level, the Fylde Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.

Before Natural England can agree with the conclusions reached, more evidence and explanation is required to support the view that additional policy wording/strengthening outlined are robust enough to ensure that the preferred options are 'unlikely to have any

significant effects on the European Sites identified, either alone or in combination with any other plans and projects. Once more details are known it is likely that changes will occur between the current draft and the next stage prior to submission; the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site. It is essential that Natural England's comments are addressed as soon as possible to ensure that the HRA is compliant with the requirements of The Conservation of Habitats and Species Regulations 2010.

Historic England had no comments to make on the Sustainability Appraisal or the Habitats Regulations Assessment.

The Environment Agency commented solely on the Sustainability Appraisal.

Blackpool Council noted that an updated Sustainability Appraisal and the Habitats Regulations Assessment assessing the implications of the policies proposed has not formed part of the consultation into the RPO version of the Local Plan.

A developer commented that there were serious concerns about the soundness of the plan, in light of the fact that the supporting Sustainability Appraisal was made available part way through the consultation period and fails to properly assess the chosen option.

A developer objected claiming that the sustainability appraisal is not adequate to meet the legislative requirements of the plan making process; the assessment of reasonable alternatives, especially at Warton, is not wide enough and does not assess all reasonable alternatives; and the abdication of strategic development locations at Warton to the neighbourhood plan fails to meet the SA requirements of this plan making process, and as such is fundamentally flawed. It is inadequate and fails to fulfil the assessment requirements of the regulations, thus making the plan as a whole unsound.

Council response

The council agrees with Natural England that as much detail needs to be considered as possible at this stage, explaining how impacts should be avoided and/or mitigated, thereby ensuring the Strategic Locations for Development and other allocated sites are deliverable without resulting in significant effects on European protected sites. The council agrees with Natural England that the conclusions in the HRA need to be based on a robust detailed assessment and that more evidence and explanation is required. The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the HRA and request further work is carried out to address Natural England's concerns. Once the additional evidence has been provided by Arcadis and the necessary amendments have been made to the Local Plan - the Publication version – Natural England will be consulted and the plan will be rescreened with respect to The Conservation of Habitats and Species Regulations 2010.

The council notes that Historic England had no comments to make on the HRA.

The council agrees with Blackpool Council's and a developer's comments that the HRA did not form part of the consultation into the RPO version of the Local Plan from 15th October to 3rd December 2015, but it was issued for consultation for a 6 week period from 23rd November 2015 to 5th January 2016.

The council also notes a developer's comments that the HRA failed to properly assess reasonable alternatives, and deferred the identification of strategic development locations at Warton to the neighbourhood plan. Following the inspector's decision into the Blackfield End Farm Inquiry, which resulted in additional homes being allowed at Warton, the council has agreed to redraft policy **SL3** in Chapter 7 to include all of the existing commitments.

Recommendations for change

- The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the HRA requesting the provision of further evidence ensuring allocated sites are deliverable without resulting in significant effects on European protected sites; and to properly assess reasonable alternatives. Once the additional evidence has been provided by Arcadis and the necessary amendments have been made to the Local Plan - the Publication version – Natural England will be consulted and the plan will be rescreened with respect to The Conservation of Habitats and Species Regulations 2010.
- Redraft policy **SL3** in Chapter 7 to include all existing commitments in Warton from the start date of the Local Plan.

Rural Proofing Assessment

Rural Proofing Assessment: General Comments

Number of representations:

Comment	Support	Object	Total
2	0	0	2

Representations received from:

- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 Resident

What you said

CPRE – Fylde District, approve of the Rural Proofing Assessment with its confirmation that at the national, local and neighbourhood level planning policies should not treat greenfield land as an unlimited resource ripe for development. However, the effectiveness of the Rural Proofing Assessment will ultimately depend on whether rural specific developments are assessed as truly sustainable.

One resident commented that the Rural Proofing Assessment, did not appear to be appropriately applied to policy as it required policy makers to ensure that the needs and interests of rural people, communities and businesses are properly considered in the development and implementation of all policies and programmes.

Council response

The council agrees with the CPRE – Fylde District's statement.

The council disputes the comments made by the resident. The Rural Proofing Assessment has been applied appropriately and the comments made are indirectly linked to the suggested housing number for Elswick, which although falling under the remit of the Rural Proofing Assessment also fall under different factors such as the need to provide 7,770 new homes within the plan period. For further clarity paragraph **7.77** of the RPO version of the Local Plan is to be amended to read: 'In Elswick, a Neighbourhood Development Plan will allocate a suitable site(s) to provide 50 ~~140~~ homes over the plan period,'

Recommendations for change

- None

Health Impact Assessment

Health Impact Assessment: General Comments:

Number of representations:			
Comment	Support	Object	Total
1	0	0	1

Representation received from:

- Treales, Roseacre and Wharles Parish Council

What you said

Treales Roseacre and Wharles Parish Council commented that the Health Impact Assessment (HIA) does not take account of the Lancashire County Council Shale (LCC) Gas HIA, which addresses the health risks associated with Shale Gas development in the Fylde. Some 61 risks were identified unacceptably impacting the health and wellbeing of Fylde communities. If the risks can be practically mitigated, many of the mitigations will require on going enforcement by the local communities and local government officials, which in turn will adversely affect the attractiveness of the area. A number of risks remain outstanding and therefore the proposed Shale Gas development creates an unacceptable impact to public health. These factors should be incorporated within the planning assumptions of the Fylde Local Plan and impacts flowed through the implications of the plans. Logically the attractiveness of the visitor, residential, retirement, leisure, commuter and inward investment in rural and new businesses will be adversely affected in comparison to other areas which are not subject to the matters detailed in the HIA.

Council response

There is no mandatory requirement to undertake a HIA under planning legislation in England and Wales. However, a HIA is a mechanism to ensure health benefits are integral to the planning process, embedding public health across the Fylde Local Plan and raising awareness amongst strategic partners and delivers. The HIA is specific to Fylde and its policies, and whether or not its proposed policies would have a detrimental impact on the health, mental health and wellbeing of the people of Fylde. The impacts of shale gas exploration are still unknown. There are counter arguments for and against shale gas exploration and the industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan, details of which would also need to be addressed in an updated HIA.

Recommendations for change

- None

DRAFT

Fylde Local Plan – Economic Viability Assessment

Economic Viability Assessment: General Comments

Number of representations:			
Comment	Support	Object	Total
2	0	0	2

Representations received from:

- 2 Developers.

What you said

A developer who has current experience of both recent land purchases and homes sales in the Fylde Borough made the following comments:

- *Further clarity is needed on the net and gross land values – what is used.*
- *We do not have experience of recent Greenfield land purchases in the borough, however experiences of bidding for sites would suggest that the figures are on the conservative side.*
- *They are currently developing a site in Fylde and can draw some experience from this:*
 - *The average sales rate achieved on the site are present is lower than those suggested – at c. £175 per sq. foot, at densities of c. 30 homes per net Hectare. Please also note that there will be incentives etc. included within the price.*
 - *In general we support a desired density of between 30-40dph.*
 - *Return on affordable homes – we are supportive of the suggested level of proportional returns on affordable properties.*
 - *Overall we would consider a profit margin of between 15-25% (return on GDV – this is the standard method we use).*
 - *Although initial sales rates have been slow on the site, this is expected to pick up as the site becomes more established to approximately 30 per annum.*
 - *There are a number of the policies that we fundamentally do not support (that raise building standards above those required by building regulations). These do have an impact on the viability and therefore as the local plan progresses it will be important to revisit the viability to make sure it is aligned.*

Another developer provided a detailed and comprehensive submission. They provided specific comments in relation to the following:

- Residential Development Types, Density and Mix
- Land Values
- Sales Values
- Affordable Housing
- Marketing and Disposal Costs
- Development Period
- Development Margin
- Build Costs
- S106 Contributions
- Contingency
- Bank Funding Costs
- Instalments Policy

They commented that the report lacks sufficient detail. They recommend that the residential viability appraisals are revisited to take into account the issues raised above and detailed summaries made available.

Council response

In response to the first developer's comments, the majority of their comments support the assumptions that were made and this is welcomed.

The land values that have been used are applied to the net developable area of the land and details of the value assumptions are provided at table 5.1 of the Economic Viability Assessment.

To inform the council's evidence base it would be helpful if the developer could provide details of the sales that have taken place to date as this information is not yet available on Land Registry. This information would include, property address, house type and floor area, price paid, date of sale and incentives offered. The developer will be approached and this information requested.

In terms of which policies they do not support, it would be helpful to understand what policies are being referred to here. The developer will be approached and clarification sought.

In response to the second developer's comments the council has received a detailed statement from Keppie Massie, the firm of consultants who undertook the Economic Viability Assessment of the Local Plan, with the support of WYG Group. That detailed statement is published alongside the Responses Report: <http://www.fylde.gov.uk/council/planning-policy--local-plan-/local-development-framework/evidence-base/economic-viability-assessment-emerging-fylde-local/> and represents the council response to the developer's representation.

As required, Keppie Massie are happy to provide the background information to the WYG Group construction costs cost assessments and summary appraisals.

Recommendations for change

- Publish a final version of the 'Economic Viability Assessment of the Revised Preferred Option: Part 1 Report' on the council's website.

¹ 'Blackpool to become latest to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector and boost economy.' Department for Communities and Local Government, James Wharton MP, Gov.uk, 12 November 2015

DRAFT

Appendix A - List of consultees who made representations on the Fylde Local Plan Revised Preferred Option (the RPO)

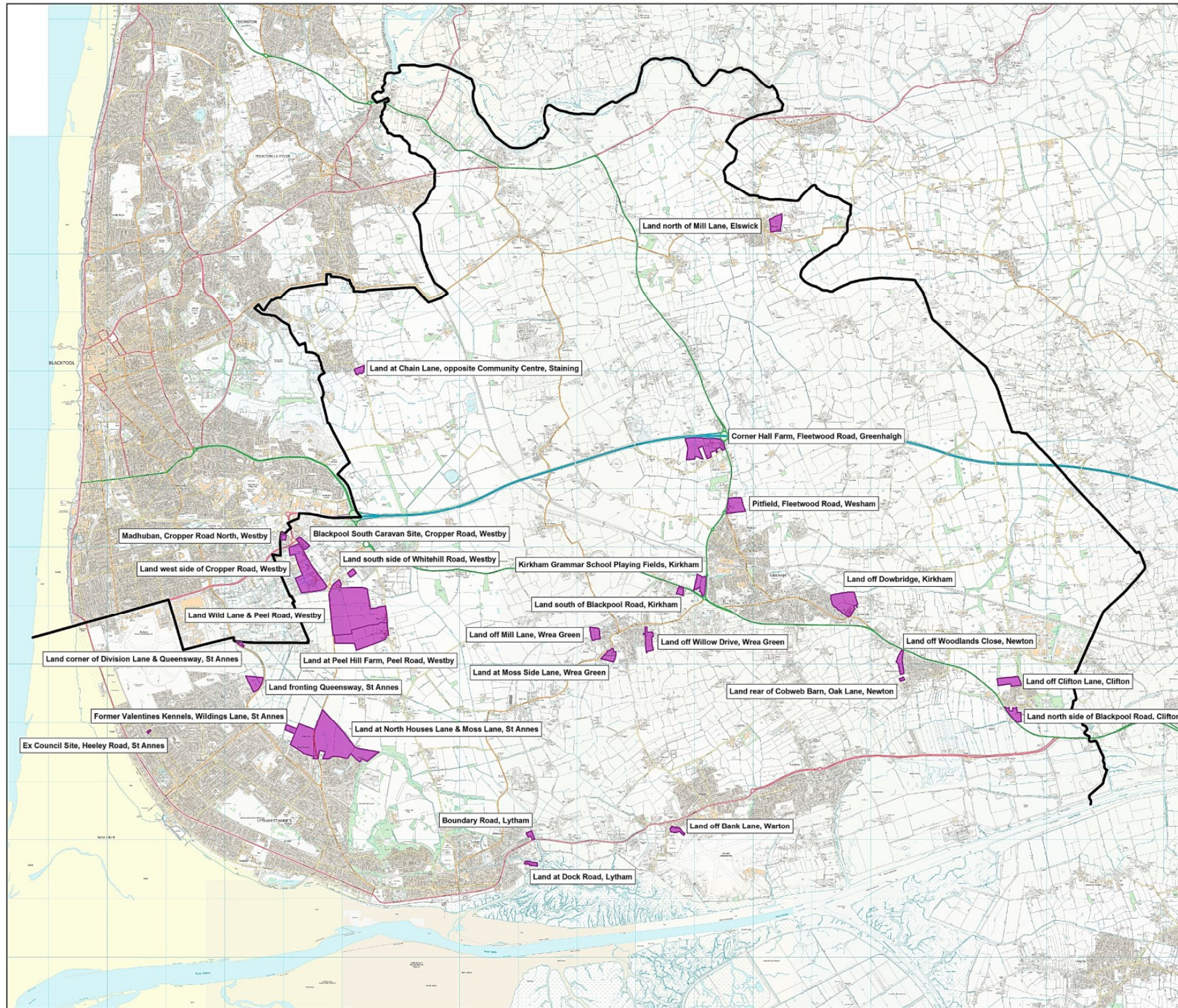
List of consultees who made representations on the Fylde Local Plan Revised Preferred Option (the RPO)	
Consultee Name	Consultee Number
Home Builders Federation	GCB/BS/08/00325
The National Federation of Gypsy Liaison Groups	GCB/ERN/11/01343
Lytham St Annes Civic Society	GCB/VB/15/02196
Newton Residents Association	OC/ACT/15/02230
The Trams to Lytham Team	OC/ACT/15/02246
Cassidy and Ashton Group Ltd	OC/AGCN/08/00245
PWA Planning	OC/AGCN/13/01516
Story Homes	OC/AGCN/13/01729
Hallam Land C/O Pegasus Group	OC/AGCN/13/01758
CBRE Planning	OC/AGCN/14/02030
Pickervance	OC/AGCN/15/02173
Hollins Strategic Land LLP	OC/AGCN/15/02235
De Pol Associates Ltd - JB	OC/AGCN/15/02244
NJL Consulting	OC/AGCN/15/02245
Persimmon Homes Lancashire	OC/AGCN/15/02258
Mr & Mrs Eastham	OC/IB/08/00555
Clifton Risk Management	OC/IB/08/00564
Mr Bickerstaff	OC/IB/08/00598
Warton Developments LLP (Mr Heeley)	OC/AGCN/10/01008
Mr Clayden	OC/IB/10/01026
Mr & Mrs Baybutt	OC/IB/10/01028
Helen Harrison	OC/IB/10/01041
Colin Hartley	OC/IB/10/01042
Alan Proctor	OC/IB/10/01043
John Hobday	OC/IB/10/01044
David Chedd	OC/IB/10/01051
Mr & Mrs Robson	OC/IB/10/01052
Peter Hall	OC/IB/10/01053
Ms Stupple	OC/IB/10/01054
Shaun Tinkler-Rose	OC/IB/10/01055
Mrs Tinker-Rose	OC/IB/10/01057
Michael & Kathleen Procter	OC/IB/10/01063
Mr & Mrs Saunders	OC/IB/10/01065
Ms Oldham	OC/IB/10/01066
Mr Schiavi	OC/IB/10/01067
Mr & Mrs Oldham	OC/IB/10/01068
Angela Cragg	OC/IB/10/01070
Miss Clark	OC/IB/10/01071

Mr Bannister	OC/IB/10/01079
Mr Lydon	OC/IB/10/01081
Mrs Thomas	OC/IB/10/01092
Dr Thompson	OC/IB/10/01098
Mr & Mrs Phillips	OC/IB/10/01099
Mrs Stafford	OC/IB/10/01100
A S & H E Hall	OC/IB/10/01101
Mr & Mrs McDougall	OC/IB/10/01104
Mrs Harrison	OC/IB/10/01119
Roy Gregory	OC/IB/10/01126
Peter & Brenda Moran	OC/IB/10/01127
Mrs Reed	OC/IB/10/01144
Mr & Mrs Tracey	OC/IB/10/01147
William Braithwaite	OC/IB/10/01148
Mr Chabba	OC/IB/10/01160
Mr Tomlinson	OC/IB/11/01337
Philip & Jackie Kendall	OC/IB/12/00385
Mr Cameron	OC/IB/12/00457
Mr Haresceugh	OC/IB/12/00505
Mr Frost	OC/IB/13/01400
Mr & Mrs Greenhalgh	OC/IB/13/01404
Mr Greaves	OC/IB/13/01464
Mr Scott	OC/IB/13/01505
Mrs McDowall	OC/IB/13/01660
Mr Leadbeater	OC/IB/13/01701
Mr P Moyes	OC/IB/13/01738
Blackpool, Fylde and Wyre Trades Union Council	OC/IB/13/01740
Mr K A Wright	OC/IB/13/01741
Mrs Frost	OC/IB/13/01769
Community Association for the Protection of Wrea Green	OC/IB/13/02027
Mr & Mrs Kilshaw	OC/IB/15/00152
Miss Tinkler-Rose	OC/IB/15/00216
Miss Tinkler-Rose	OC/IB/15/00383
B Dodd	OC/IB/15/00386
Lynn Telford	OC/IB/15/00517
Mrs Cross	OC/IB/15/00537
Mr Marshall	OC/IB/15/00593
Mr. Fairbans	OC/IB/15/00614
Mrs Richardson	OC/IB/15/00769
Mr Bebbington	OC/IB/15/00776
R & E Hardman	OC/IB/15/01088
Miss Bebbington	OC/IB/15/01108
Mr. Bebbington	OC/IB/15/01232
Mrs Rowe	OC/IB/15/01250

Mr Bebbington	OC/IB/15/01286
Mr Willoughby	OC/IB/15/01325
Mrs King	OC/IB/15/01326
Margaret Cookson	OC/IB/15/02072
Ms Hartley	OC/IB/15/02075
Mr Park	OC/IB/15/02137
Mr & Mrs I Robson	OC/IB/15/02142
Mr Jackson	OC/IB/15/02148
Mr Simco	OC/IB/15/02149
David Francis	OC/IB/15/02150
Mr Galvin	OC/IB/15/02151
Dr Flath	OC/IB/15/02152
Ms Boxall	OC/IB/15/02153
Mr Scullion	OC/IB/15/02154
Ms Galvin	OC/IB/15/02155
Mrs Francis	OC/IB/15/02156
Ms Fenton	OC/IB/15/02157
Mr & Mrs McFarlane	OC/IB/15/02158
D & G Hardman	OC/IB/15/02159
Mr & Mrs Clarence	OC/IB/15/02160
Mr & Mrs Ward	OC/IB/15/02161
Mr & Mrs Loftus	OC/IB/15/02162
Mrs Lee	OC/IB/15/02163
R E Gapp	OC/IB/15/02165
Mrs Simonsen	OC/IB/15/02166
Ms Skorczewski	OC/IB/15/02167
Ms Oldham	OC/IB/15/02168
Mr Fenton	OC/IB/15/02169
Ms Braithwaite	OC/IB/15/02171
Ms Parkinson	OC/IB/15/02172
Mr Whaite	OC/IB/15/02174
Miss Whaite	OC/IB/15/02175
G Norman	OC/IB/15/02178
Mr Mahon	OC/IB/15/02193
Mr Calmus	OC/IB/15/02194
Carmen Parkinson	OC/IB/15/02195
Adrian, Susan & Rosanaugh Long	OC/IB/15/02197
Mr King	OC/IB/15/02198
Mr Clayden	OC/IB/15/02199
Mr Hill	OC/IB/15/02200
Mrs PROCTER	OC/IB/15/02201
Mr Fox	OC/IB/15/02202
Ms Linton	OC/IB/15/02203
Mrs Headley	OC/IB/15/02204

Mr Headley	OC/IB/15/02205
Mr P Headley	OC/IB/15/02206
Mr Headley	OC/IB/15/02207
Philip Langley	OC/IB/15/02209
Dr Baylis	OC/IB/15/02210
Mr Holland	OC/IB/15/02211
Mr Kendall	OC/IB/15/02213
Mr Barbour	OC/IB/15/02214
Mr Astley	OC/IB/15/02215
Mrs L Oades	OC/IB/15/02216
Mr Smith	OC/IB/15/02218
Mr Duckworth	OC/IB/15/02219
Mr Busby	OC/IB/15/02220
Mr McCormick	OC/IB/15/02221
Mr Tomlinson	OC/IB/15/02222
Mr Berry	OC/IB/15/02224
Mr Ingram	OC/IB/15/02225
Mr Guest	OC/IB/15/02226
Mr & Mrs Nulty	OC/IB/15/02229
Margaret Collinge	OC/IB/15/02231
Mr Donnelly	OC/IB/15/02232
National Custom & Self Build Association c/o Foxely Tagg Planning Ltd	OC/IB/15/02233
Mr Whiteside	OC/IB/15/02234
Mrs Stackhouse	OC/IB/15/02236
Mr McAlonan	OC/IB/15/02237
Mr Thompson	OC/IB/15/02238
Mr Carr	OC/IB/15/02239
Martine Hayhurst	OC/IB/15/02252
Annie Thornley	OC/IB/15/02253
Mr Whittle	OC/IB/15/02254
Mrs Bevan	OC/IB/15/02256
E C C Poon	OC/IB/15/02257
Ms Hulme	OC/IB/15/02259
Canal and River Trust (formerly British Waterways)	OC/ISP/08/00692
McTaggart & Michael c/o Colliers International	OC/LO/12/00968
Co-operative Estates	OC/LO/13/01768
J J Bamber	OC/LO/15/00160
Mr Coxon c/o Smith Planning Consultants	OC/LO/15/01209
Steven Abbott Associates	OC/LO/15/01363
Metacre Ltd - De Pol Associates	OC/LO/15/02109
BAE Systems Real Estate Solutions - AA - c/o Cass Associates	OC/LO/15/02112
Ideal Corporate Solutions Ltd - Emery Planning Partnership	OC/LO/15/02116
Caravan Club - c/o Savills Duncan Parr	OC/LO/15/02132
Smith Love Planning Consultants	OC/LO/15/02228

Steven Abbott Associates	OC/LO/15/02242
De Pol Associates Ltd	OC/LO/15/02243
Wild Lane and Peel Road Landowners c/o Smith Love Planning Consultants	OC/LO/15/02247
Mr James c/o Steven Abbott Associates	OC/LO/15/02248
PWA Planning	OC/LO/15/02249
Fox Planning Consultancy	OC/LO/15/02250
Morris Homes (North) Ltd	OC/LPD/08/00722
Windmill Group of Companies	OC/LPD/08/00725
McCarthy & Stone Retirement Lifestyle Ltd c/o/ The Planning Bureau Ltd	OC/LPD/13/01767
Minerva Developments c/o Sedgewick Associates	OC/LPD/15/02119
Wainhomes Development c/o Emery Planning	OC/LPD/15/02217
Kensington Developments c/o McAteer Associates	OC/LPD/15/02223
Taylor Wimpey UK Ltd c/o Cushman & Wakefield Ltd	OC/LPD/15/02227
Applewaite Ltd c/o Janet Dixon Town Planner	OC/LPD/15/02241
Gilletts (Callington) Ltd c/o Knights Professional Services Ltd	OC/LPD/15/02251
The National Trust	OC/MISC/08/00833
Fylde Borough Council, Building Control Manager	OC/MISC/08/00837
National Farmers Union	OC/NCC/08/00771
Sport England	OC/SC/B/08/00845
Lytham St Annes Cycle Group	OC/SC/B/13/01371
Kirkham Grammar c/o Steven Abbott Associates	OC/SCH/12/00997
Historic England	SCB/GD/15/00080
Blackpool Council, Head of Planning	SCB/LA/08/00388
Wyre Council	SCB/LA/08/00391
Lancashire County Council - Marcus Hudson	SCB/LA/12/00960
Medlar with Wesham Town Council	SCB/PC/08/00403
Kirkham Town Council	SCB/PC/08/00405
Newton with Clifton Parish Council	SCB/PC/08/00406
Elswick Parish Council	SCB/PC/08/00408
Greenhalgh with Thistleton Parish Council	SCB/PC/08/00409
Treales Roseacre & Wharles Parish Council	SCB/PC/08/00412
Bryning with Warton Parish Council	SCB/PC/08/00416
Natural England	SCB/SCB/08/00343
Highways England	SCB/SCB/08/00347
Environment Agency	SCB/SCB/08/00351
United Utilities North West	SCB/SCB/08/00355
CPRE - Fylde District	SCB/SCB/08/00363
Marine Management	SCB/SCB/14/02044



(c) Crown Copyright and
database right (2016).
Ordnance Survey
(100006084).



SPECIFIC SITES SUBMITTED
DURING FYLDE LOCAL PLAN
RPO CONSULTATION

FYLDE COUNCIL

Development Services
Town Hall
St Annes
FY8 1LW

Scale
0 600 1200 1800 2400 3000 m

Date : February 2016



SETTLEMENT HIERARCHY BACKGROUND PAPER

January 2016

CONTENTS

1.0	<u>Introduction</u>	page 3
2.0	<u>Scope of Background Paper</u>	page 3
3.0	<u>Methodology</u>	page 3
4.0	<u>Results</u>	
	Population	page 8
	Public Transport	page 8
	Shopping	page 9
	Services	page 11
	Schools	page 13
	Open space	page 15
	Overall scores	page 16
	Settlement Hierarchy	page 17
	The Retail Hierarchy in Fylde	page 18
5.0	<u>Recommendations</u>	page 19
6.0	<u>Appendix - Scoring for Bus Services</u>	page 20

List of Tables

Table 1: Population of each settlement	page 8
Table 2: Bus service score	page 8
Table 3: Access to bus services	page 8
Table 4: Access to train services	page 9
Table 5: Access to shopping centres – Urban centres	page 9
Table 6: Access to shopping centres – Rural settlements	page 10
Table 7: Access to supermarkets	page 10
Table 8: Access to Post Offices	page 11
Table 9: Access to Libraries	page 11
Table 10: Access to Community Facilities	page 12
Table 11: Access to Doctors Surgeries (GPs)	page 12
Table 12: Access to indoor sports and leisure facilities	page 13
Table 13: Access to primary schools	page 14
Table 14: Access to secondary schools	page 14
Table 15: Access to Open Space (Green Infrastructure network)	page 15

1.0 Introduction

This paper sets out the settlement hierarchy for Fylde, and will form part of the background evidence for the Local Plan which covers the period from 2011 to 2032. It indicates in broad terms which settlements are best placed to deliver the sustainable development, accommodating Fylde's requirements, and therefore underpins the Development Strategy for the Local Plan. The key objective of sustainable development is expressed in both the National Planning Policy Framework and National Planning Practice Guidance.

'The purpose of planning is to help achieve sustainable development' (NPPF, page i).

2.0 Scope of Background Paper

The Background Paper will assess the following settlements so as to produce a ranking order (hierarchy) of settlements in Fylde, for inclusion in the draft Local Plan:

- | | |
|---------------------|------------------|
| 1. Ansdell | 11. Squires Gate |
| 2. Clifton | 12. St Annes |
| 3. Elswick | 13. Staining |
| 4. Freckleton | 14. Treales |
| 5. Kirkham | 15. Warton |
| 6. Little Eccleston | 16. Weeton |
| 7. Lytham | 17. Wesham |
| 8. Newton | 18. Wharles |
| 9. Normoss | 19. Wrea Green |
| 10. Singleton | |

3.0 Methodology

Accessibility criteria and scoring

The former North West of England Plan Regional Spatial Strategy to 2021 (RSS), which has been revoked, set out accessibility criteria and scoring schemes for new employment and residential development. This criteria and scoring scheme is based upon the criteria and scoring in the former Joint Lancashire Structure Plan.

The purpose of the settlement hierarchy is to rank the settlements of the borough according to the size of their population and the availability of services and facilities. As the accessibility criteria and scoring in the former RSS is used to assess the accessibility of new employment and residential development to services and facilities, it is not feasible to use this to determine the settlement hierarchy. Although the RSS has been revoked, the principles it used to ascertain the settlement hierarchy remain sound and so the criteria and scoring in that document can be used to provide an indication of the weight that could be given to different themes, such as access to schools, open space (Green Infrastructure network) and public transport.

In consideration of this, the criteria and scoring in the former RSS has been used as a basis for the criteria and scoring in the settlement hierarchy. It should be noted that the criteria and scoring in the former RSS was always intended as good practice, and is not policy. The

settlement hierarchy has specifically been informed by the residential criteria and scoring, as this sets out criteria that are more relevant to inform a settlement hierarchy, such as access to shopping and schools.

Fylde settlement hierarchy criteria and scoring

The criteria and scoring used for this settlement hierarchy are set out below.

Maximum score: 5

The factors below are regarded to have the biggest influence on the position of each settlement in the settlement hierarchy. Therefore, maximum scores of '5' have been attributed to each criteria listed. Note that the criteria and scoring in the former RSS in relation to bus services, primary schools and open space were also given a maximum score of '5'.

- Population
- Bus services
- Primary schools
- Open space

Maximum score: 3

The factors below are considered to have a moderate influence on the position of each settlement in the settlement hierarchy. Therefore, maximum scores of '3' have been attributed to each criteria listed. The criteria and scoring in the former RSS in relation to these factors were also given a maximum score of '3'.

- Train service
- Secondary schools

Maximum score: 1

The factors below are considered to be basic services that have a lesser influence on the position of each settlement in the settlement hierarchy. Therefore, maximum scores of '1' have been attributed to each criteria listed.

The specific criteria in the former RSS gives a maximum score of '5' in relation to new residential development having access to at least three out of five basic services. Therefore, the former RSS also gives a lesser weight to each basic service.

- Post office
- Libraries
- Community facility
- Doctor's surgery (GPs)
- Indoor sport / leisure / entertainment facilities

As an exception, a maximum score of '2' is given in relation to libraries, in order to differentiate from settlements that only have access to a mobile library, where a score of '1' is given.

In carrying out these assessments it is acknowledged that, in the future, certain services available in some of the settlements may be discontinued or the level of provision reduced and that access to services may change. However, as the outcome of these service reviews is unknown at this time, all services have been assessed at their current levels of provision.

Defining the settlements

The settlements are all of the areas in Fylde that are bounded by 'limits of development' as shown on the Fylde Borough Local Plan (As Altered: October 2005) Proposals Map. The limits of some settlements, however, are not clear, as some settlements are joined together, whilst others overlap into Blackpool. The definition of these settlements is explained below.

- Lytham, Ansdell and St Annes are not divided by the 'limits' of development. Therefore, Lytham is considered to be the parts of the wards of St Johns and Clifton within the 'limits' of Lytham St Annes, Ansdell is considered to be the ward of Ansdell, and St Annes is considered to be the remainder of the Lytham St Annes area within the 'limits' of development.
- Kirkham and Wesham are also not divided by 'limits' of development. Therefore, these settlements are considered to be separated by the railway line.
- Normoss overlaps into Blackpool. For the settlement hierarchy, Normoss is considered to be the part of the settlement within Fylde.
- The Squires Gate area overlaps into Blackpool. For the settlement hierarchy, Squires Gate is considered to be the part of the area that is located within Fylde.

It needs to be noted that, in assessing access to services and facilities, the settlement hierarchy considers facilities and services in neighbouring boroughs that are within the criteria measurements set out below.

Criteria measurements

The hierarchy considers population, along with services and facilities that are within easy access of a settlement. For the purpose of the hierarchy, easy access is generally considered to be no more than 10 minutes walking distance from the centre of the settlement. This is approximately 800 metres. It should be noted that the centre of Normoss is considered to be the central part of the area of Normoss within Fylde. The centre of Squires Gate is considered to be the central part of the residential area of Squires Gate within Fylde.

There are two exceptions to the 10 minute walk rule. The first is secondary school access. A maximum threshold of 1km cycling distance to a secondary school from a new residential development has been used for the hierarchy to determine whether a settlement has access to a secondary school, as measured from the centre of the settlement.

The second exception is access to a supermarket. These are places where consumers often undertake weekly shopping trips, therefore the majority visit using the car or public transport. Consequently, a threshold of 3km from the centre of each settlement has been used to determine whether each settlement has easy access to a superstore or supermarket.

The above methodology means that some settlements will have access to facilities and services that are within adjacent settlements / areas / boroughs.

Other criteria measurements

Other criteria have been used in this settlement hierarchy (of a different nature to the criteria set out above). The methodology used in measuring these other criteria is explained below.

Population

➤ Population

The neighbourhood statistics website has been used to determine the population for each settlement. The population in this settlement hierarchy is the number of people counted as usually resident in the area at the time of the 2011 census. The data is based upon wards, unless there is a significant amount of the ward in the rural area, or there is more than one settlement within the ward. In these cases, new areas have been constructed, using the 'custom' section of the website, in order to obtain population data for a specific area, and the 'limits of development' have been followed as closely as possible.

Public transport

➤ Bus services

The hierarchy takes account of the number of buses and the number of settlements that can be accessed by bus. Bus timetables have been used to obtain this information. The scoring for each settlement has therefore been derived by combining the frequency of the bus service along with the number of settlements visited. The scoring is based on the point in the settlement which has the most frequent bus service. The number of settlements visited consists of the settlements within the hierarchy, along with Preston and Blackpool (which are major destinations close to, but outside Fylde).

The tables in the appendix show how the scoring for bus services has been derived for each settlement. The number of buses per hour are from Monday to Saturday, and are one way. The scoring does not take account of school services.

➤ Train services

The settlement hierarchy takes account of train frequency, and this information has been obtained from train timetables. Kirkham and Wesham railway station, which is situated on both the North Fylde Railway line and the South Fylde Railway Line, between Preston and Blackpool, is the station served by the highest number of train services in Fylde. There are two services that stop at the Kirkham and Wesham railway station every hour. Squires Gate, St Annes, Ansdell and Lytham stations are

all situated on the South Fylde railway line, and there is only one service per hour at these stations. None of the other settlements in the hierarchy have a rail service.

Shopping

➤ Urban settlements

The urban settlements have been categorised by type of centre by way of a **Retail Hierarchy: i.e. town centre, district centre and local centre**. This provides an indication of the level of shopping within each centre. The Revised Preferred Option version of the emerging Fylde Local Plan includes defined town, district and local centre boundaries; together with primary and secondary retail frontages.

Town centres: The towns of Kirkham, Lytham and St Annes have a larger number of shops than the other settlements as they are the largest towns in Fylde. These are categorised in the scoring in this Settlement Hierarchy Background Paper and designated in the emerging Fylde Local Plan as Town Centres.

District centres: Ansdell has a concentration of shops. Ansdell is designated as a District Centre in the Revised Preferred Option version of the Fylde Local Plan.

Local centres: Freckleton has a cluster of shops. In St Annes, Alexandria Drive; Headroomgate Road; St David's Road North; and St Alban's Road, have clusters of shops. These are all designated as Local Centres in the Revised Preferred Option version of the Fylde Local Plan.

[Normoss has a cluster of shops within the Blackpool boundary. The clusters of shops at Squires Gate are just within the Blackpool boundary, and are designated as 'local centres' in the Blackpool Local Plan. (There are three 'local centres' at Squires Gate)].

New **Local Centres** are proposed for Warton and for Whitehills (i.e. the land in the Fylde-Blackpool Periphery in the vicinity of Junction 4 of the M55 Motorway) in the Revised Preferred Option version of the Fylde Local Plan. These two new local centres are planned to be delivered by the end of the plan period in 2032.

➤ Rural settlements

Most of the rural settlements (i.e. Tier 1 Larger Rural Settlements and Tier 2 Smaller Rural Settlements) in Fylde do not have retail centres. However, for the rural settlements it is practical to count the number of shops, as no rural settlement has more than one local store. This hierarchy has separated the urban settlements from the rural settlements. The urban areas have been categorised by type of centre, as this gives a strong indication of the level of shopping facilities compared to other settlements. The rural settlements have been categorised by whether or not they have a store.

4.0 Results

Population

Population

The following scoring has been used for the population of each settlement:

Table 1: Population of each settlement		Score
More than 10,000	St Annes	5
5,000-10,000	Kirkham, Lytham	4
3,000-5,000	Ansdell, Freckleton, Wesham	3
1,000-3,000	Elswick, Newton, Normoss, Staining, Warton, Wrea Green	2
Up to 1,000	Clifton, Little Eccleston, Singleton, Squires Gate, Treales, Weeton, Wharles	1

Public Transport

Bus service

The table below shows how the scores for each settlement relates to the hierarchy scores. The appendix shows how the scoring for bus services has been derived.

Table 2: Bus service score (i.e. the total number of buses per hour, plus the number of destinations)						
Bus service score	0	1-9	10-19	20-29	30-39	40+
Settlement hierarchy score	0	1	2	3	4	5

In line with the above scoring system, each settlement is ranked as follows in relation to bus services:

Table 3: Access to bus services					
Settlement	Score *	Settlement hierarchy Score	Settlement	Score *	Settlement hierarchy Score
St Annes	47	5	Little Eccleston	14	2
Lytham	44	5	Elswick	12	2
Kirkham	42	5	Normoss	9	1
Ansdell	36	4	Wrea Green	9	1
Wesham	35	4	Singleton	7	1

Squires Gate	31	4	Weeton	7	1
Newton	21	3	Treales	5	1
Warton	19	2	Staining	4	1
Freckleton	19	2	Wharles	0	0
Clifton	15	2			

*Score = The total number of buses per hour plus the number of destinations (see Appendix at back of this paper).

Train service

Kirkham and Wesham railway station has the most frequent train service in Fylde. Therefore, these settlements are given a score of '3'. Squires Gate, St Annes, Ansdell and Lytham, each with one service per hour, are given scores of '2', in order to give weight to their accessibility to a train service. The other settlements are given a '0' score, as they have no train services.

Table 4: Access to train services		Score
2 per hour	Kirkham, Wesham	3
1 per hour	Ansdell, Lytham, St Annes, Squires Gate	2
No service	Clifton, Elswick, Freckleton, Little Eccleston, Newton, Normoss, Singleton, Staining, Treales, Warton, Weeton, Wharles, Wrea Green	0

Shopping

Urban centres

The scoring for Fylde's urban centres is set out in the table below.

Table 5: Access to shopping centres – Urban centres		Score
Town centres	Kirkham, Lytham, St Annes	5
District centres	Ansdell	4
Local centres	Freckleton Normoss, Squires Gate	3

Note: Warton is not currently a local (retail) centre.

Tier 1 Larger Rural settlements and Tier 2 Smaller Rural Settlements

The scoring for Fylde's rural settlements is set out in the table below.

Table 6: Access to shopping centres – Rural settlements		Score
Local store	Clifton (combined with Post office), Elswick, Little Eccleston, Newton, Staining, Wrea Green	2
No local store	Singleton*, Treales, Weeton, Wharles	0

* Note that the local store in Singleton is not currently trading

Notes:

- Clifton has a post office which sells groceries. Therefore, Clifton is considered to have a local store.
- Little Eccleston has no local store. However, a local store in Great Eccleston is approximately 800 metres from the centre of Little Eccleston. Therefore, Little Eccleston is considered to have easy access to a local store.

Supermarkets / superstores

The superstores ⁽¹⁾ identified are Booths, Heyhouses, St Annes; Booths, Lytham; Morrisons, Kirkham; and Morrisons, Squires Gate. The supermarkets ⁽²⁾ identified are Sainsbury's, St Annes; Marks and Spencer Simply Food, St Annes; Aldi, St Annes and Lidl, Lytham. The scoring in relation to superstore / supermarket access is set out in the table below.

Table 7: Access to superstores / supermarkets		Score
Superstore / supermarket within settlement or within 3km of settlement	Ansdell, Kirkham, Lytham, Newton, St Annes, Squires Gate, Treales, Warton, Wesham, Wrea Green	3
Superstore / supermarket further than 3km from settlement	Clifton, Elswick, Freckleton, Little Eccleston, Normoss, Singleton, Staining, Weeton, Wharles	0

¹ A superstore was defined in former Planning Policy Statement 4 (PPS4) as a self-service store selling mainly food, or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking.

² A supermarket was defined in former Planning Policy Statement 4 (PPS4) as a self-service store selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.

Notes:

- Tesco Extra at Clifton (in Blackpool) is more than 3km from any of the settlements in the settlement hierarchy. Therefore, this superstore is not considered.

Services

Post Office

This part of the hierarchy is based on whether the settlement has access to a post office. Some of the larger settlements have more than one post office. However, as they are serving larger populations, they are given equal scores to those settlements with only one post office. The scoring in relation to post office access is set out in the table below.

Table 8: Access to Post Offices		Score
Post office	Ansdell, Clifton , Freckleton, Kirkham, Little Eccleston, Lytham, Newton, Normoss, St Annes, Squires Gate, Wesham, Wrea Green	1
No post office	Elswick, Singleton*, Staining, Treales, Warton, Weeton, Wharles	0

* Note that the post office in Singleton is not currently trading

Notes:

- Great Eccleston post office is less than 800 metres from the centre of Little Eccleston. Therefore Little Eccleston is considered to have access to a post office.

Library

This part of the hierarchy is based on whether the settlement has access to a library. The scoring for library access is set out in the table below.

Table 9: Access to Libraries		Score
Library	Ansdell, Freckleton, Kirkham, Lytham, Normoss, St Annes, Wesham	2
Mobile library	Clifton, Elswick, Little Eccleston, Newton, Singleton, Staining, Treales, Warton, Weeton, Wrea Green	1
No library	Squires Gate, Wharles	0

Notes:

- Normoss has a library within 800 metres of the centre of Normoss. Therefore, Normoss is considered to have access to a library.
- Kirkham library is within 800 metres of the centre of Wesham. Therefore, Wesham is considered to have access to a library.
- Treales has two mobile libraries that stop well within 800 metres of the centre of the settlement. Therefore, Treales is considered to have a mobile library service.

Community facility

The term 'community facility' in the context of this settlement hierarchy refers to an indoor community facility where a room (or rooms) can be hired for community functions e.g. bingo, yoga etc, and that can also be hired for private use e.g. wedding reception. Such buildings are typically halls and community centres. The scoring in relation to access to community facilities is set out in the table below.

Table 10: Access to Community Facilities		Score
Community facility	Ansdell, Elswick, Freckleton, Kirkham, Lytham, Newton*, St. Annes, Singleton, Staining, Warton, Weeton, Wesham, Wrea Green	1
No community facility	Clifton, Little Eccleston, Normoss, Squires Gate, Treales, Wharles	0

* The Public House in Newton has been counted as a community facility

Notes:

- The Ansdell Institute is considered to be a community facility for Ansdell.
- St Annes United Reformed Church is considered to be a community facility for St Annes.
- Lytham Assembly Rooms is considered to be a community facility for Lytham.
- The Wrea Green Institute is considered to be a community facility for Wrea Green.
- The Blackpool City Learning Centre is considered to be a community facility for Normoss. This facility is outside the boundary of Fylde, but is within 800m of the centre of Normoss.
- All the other settlements with a 'community facility' contain either a hall or a community centre.

Doctors Surgery (i.e. GPs)

This part of the settlement hierarchy is based on whether the settlement has access to a doctors' surgery (GP). The scoring in relation to access to a doctors' surgery is set out in the table below.

Table 11: Access to Doctors Surgeries (GPs)		Score
General Practitioner	Ansdell, Freckleton, Kirkham, Lytham, St Annes	1
No General Practitioner	Clifton, Elswick, Little Eccleston, Newton, Normoss, Singleton, Staining, Squires Gate, Treales, Warton, Weeton, Wesham, Wharles, Wrea Green	0

Notes:

- The nearest doctors' surgery (GP) to Wesham is further than 800 metres from the centre of the settlement. Therefore, Wesham is not considered to have easy access

to a doctors' surgery (GP) as the doctors' surgery is more than 800 metres from the centre of the settlement.

- The nearest doctors' surgery (GP) to Warton is within Freckleton. This facility is further than 800 metres from the centre of Warton. Therefore, Warton is not considered to have easy access to a doctors' surgery (GP).
- Normoss has a doctors surgery (GP) more than 800 metres outside the centre of the settlement. Therefore, Normoss is not considered to have easy access to a doctors' surgery (GP).
- The health centre in Great Eccleston is more than 800 metres from the centre of Little Eccleston. Therefore, Little Eccleston is not considered to have easy access to a doctors' surgery (GP).
- The nearest doctors' surgery (GP) to Squires Gate is more than 800 metres from the centre of the residential part of Squires Gate. Therefore, Squires Gate is not considered to have easy access to a doctors' surgery (GP).

Indoor sport / leisure / entertainment facilities

This part of the hierarchy is based on whether a settlement has easy access to indoor sports and leisure facilities, such as a swimming pool, gym, cinema or other similar type of facility. The scoring in relation to access to such facilities is set out in the table below.

Table 12: Access to indoor sports and leisure facilities		Score
Indoor sport / leisure facility	Ansdell, Kirkham, Lytham, Normoss, St Annes, Warton	1
No indoor sport / leisure facility	Clifton, Elswick, Freckleton, Little Eccleston, Newton, Singleton, Staining, Squires Gate, Treales, Weeton, Wesham, Wharles, Wrea Green	0

Notes:

- St Annes has several facilities, including a cinema and swimming pool.
- Ansdell has the YMCA Sports Arena.
- Lytham has Lowther Pavilion.
- Kirkham has a swimming pool and access to Ribby Hall Village.
- Warton has BACTIVE Fitness Centre.
- The Blackpool City Learning Centre is within 800 metres of the centre of Normoss outside of the boundary of Fylde.
- The other settlements are not within easy access of such facilities.

Schools

Primary school

This part of the settlement hierarchy is based on whether a settlement has easy access to a primary school. The scoring for primary school access is set out in the table below.

Table 13: Access to primary schools		Score
Primary school	Ansdell, Freckleton, Kirkham, Lytham, Newton, Normoss, St Annes, Singleton, Staining, Warton, Weeton, Wesham, Wrea Green	5
No primary school	Clifton, Elswick, Little Eccleston, Squires Gate, Treales, Wharles	0

Notes:

- Weeton Primary School is within 800 metres of the centre of Weeton. Therefore, Weeton is considered to have easy access to a primary school.
- Roseacre Primary School in Blackpool is more than 800 metres from the centre of the residential part of Squires Gate. Therefore, Squires Gate is not considered to have easy access to a primary school.
- St Mary's RC School in Great Eccleston is further than 800 metres from the centre of Little Eccleston. Therefore, Little Eccleston is not considered to have easy access to a primary school.
- Copp C of E Primary School, North of Elswick, is more than 800 metres from the centre of Elswick. Therefore, Elswick is not considered to have easy access to a primary school.

Secondary school

This part of the settlement hierarchy refers to whether a settlement has easy access to a secondary school. The scoring for secondary school access is set out in the table below.

Table 14: Access to secondary schools		Score
Secondary school	Ansdell, Kirkham, Lytham, St Annes	3
No secondary school	Clifton, Elswick, Freckleton, Little Eccleston, Newton, Normoss, Singleton, Squires Gate, Staining, Treales, Warton, Weeton, Wesham, Wharles, Wrea Green	0

Notes:

- Ansdell, Kirkham, Lytham and St Annes all have secondary schools within their settlements.
- The schools in Kirkham are more than 1km from the centre of Wesham. Therefore, Wesham is not considered to have easy access to a secondary school.

Open space

Open space (Green Infrastructure network)

This part of the hierarchy refers to whether a settlement has easy access (i.e. accessibility) to open space (Green Infrastructure network). Specifically, this refers to Public Open Space and Recreational Areas. Normoss Public Open Space as designated in the Blackpool Local Plan is within 800 metres of the centre of the settlement. Therefore, Normoss is given a score. These types of open space have been chosen because they are areas of outdoor recreation space that are accessible to the general public.

Some settlements have only one area of open space (Green Infrastructure network), whilst other settlements may have several areas of open space. To differentiate between these settlements, a category has been added to the scoring that gives extra weight to settlements with more than one area of open space. The scoring in relation to open space access is set out in the following table.

Table 15: Access to Open Space (Green Infrastructure network)		Score
More than one designated open space	Ansdell, Elswick, Freckleton, Kirkham, Lytham, St Annes, Singleton, Weeton, Wesham, Wrea Green	5
Designated open space	Clifton, Newton, Normoss, Squires Gate, Staining, Treales, Warton	3
No designated open space	Little Eccleston, Wharles	0

Notes:

- Treales has Open Space well within 800 metres of the centre of the settlement. Therefore, Treales is considered to have access to designated open space.

Overall scores

The table below shows all the scores for all the categories under each of the settlements, along with the overall total score for each settlement.

	Andsell	Clifton	Elswick	Freckleton	Kirkham	Little Eccleston	Lytham	Newton	Normoss	St Annes	Singleton	Staining	Squires Gate	Treales	Warton	Weeton	Wesham	Wharles	Wrea Green
Population																			
Population	3	1	2	3	4	1	4	2	2	5	1	2	1	1	2	1	3	1	2
Public transport																			
Bus service	4	2	2	2	5	2	5	3	1	5	1	1	4	1	2	1	4	0	1
Train service	2	0	0	0	3	0	2	0	0	2	0	0	2	0	0	0	3	0	0
Shopping																			
Urban centres	4			3	5		5		3	5			3				0		
Rural Settlements		2	2			2		2			0	2		0		0		0	2
Supermarket	3	0	0	0	3	0	3	3	0	3	0	0	3	3	3	0	3	0	3
Services																			
Post office	1	1	0	1	1	1	1	1	1	1	0	0	1	0	0	0	1	0	1
Library	2	1	1	2	2	1	2	1	2	2	1	1	0	1	1	1	2	0	1
Community facility	1	0	1	1	1	0	1	1	0	1	1	1	0	0	1	1	1	0	1
Doctors Surgery (GPs)	1	0	0	1	1	0	1	0	0	1	0	0	0	0	0	0	0	0	0
Indoor leisure facility	1	0	0	0	1	0	1	0	1	1	0	0	0	0	1	0	0	0	0
Schools																			
Primary school	5	0	0	5	5	0	5	5	5	5	5	5	0	0	5	5	5	0	5
Secondary school	3	0	0	0	3	0	3	0	0	3	0	0	0	0	0	0	0	0	0
Open space																			
Open space	5	3	5	5	5	0	5	3	3	5	5	3	3	3	3	5	5	0	5
TOTAL SCORE	35	10	13	23	39	7	38	21	18	39	15	15	17	9	18	14	27	1	21

Settlement Hierarchy

In line with the scores, the proposed settlement hierarchy for Fylde, which will be taken forward in the Revised Preferred Option version of the Local Plan, is as follows:

Kirkham	Key Service Centre	39=
St Annes	Key Service Centre	39=
Lytham	Key Service Centre	38
Ansdell	Part of Lytham Key Service Centre	35
Wesham	Local Service Centre	27
Freckleton	Local Service Centre	23
Wrea Green	Tier 1: Larger Rural Settlement	21=
Newton	Tier 1: Larger Rural Settlement	21=
Normoss	Settlement within Fylde Borough adjacent to the Blackpool boundary	18=
Warton	Local Service Centre	18=
Squires Gate	Settlement within Fylde Borough adjacent to the Blackpool boundary	17
Staining	Tier 1: Smaller Rural Settlement	15
Singleton	Tier 2: Larger Rural Settlement	14=
Weeton	Tier 2: Smaller Rural Settlement	14=
Elswick	Tier 1: Larger Rural Settlement	13
Clifton	Tier 2: Smaller Rural Settlement	10
Treales		9
Little Eccleston		7
Wharles		1

Key Service Centres

Key Service Centres include a range of housing and employment opportunities, as well as retail, leisure, community, civic, health, and education facilities and financial and professional services that serve a wide area. They have good public transport links to surrounding areas, or the potential for their development and enhancement.

Local Service Centres

Local Service Centres provide a more limited range of services to the local community, compared to Key Service Centres – they provide facilities to serve local community needs. Local Service Centres serve their own communities and those in nearby rural settlements with basic services and are well placed to provide for future local housing and employment needs. Good access to services is essential if rural communities are to flourish.

Tier 1: Larger Rural Settlements

The larger rural settlements provide small scale essential local services, as well as local opportunities for employment. They can therefore be regarded as sustainable communities, albeit with a dependency on, and sustainable transport connection to / from, the Key Service Centres and Local Service Centres.

Tier 2: Smaller Rural Settlements

The smaller rural settlements have fewer essential services and employment opportunities and tend to have limited transport connections with the Key Service Centres and Local Service Centres.

The Retail Hierarchy in Fylde

Retail Hierarchy

The retail hierarchy of town, district and local centres within Fylde is as follows:

1. Town Centre

Kirkham;
Lytham;
and St Annes

2. District Centre

Ansdell.

3. Local Centres

Freckleton;
Alexandria Drive, St Annes;
Headroomgate Road, St Annes;
St David's Road North, St Annes;
St Alban's Road, St Annes;
A local centre is proposed in Warton; and
A local centre is proposed in Whitehills

5.0 Recommendations

- 1) **Warton:** Further investment is required in Warton over the course of the plan period to 2032, to improve services to ensure that the settlement becomes a Local Service Centre through the provision of a local retail centre, including shops and community facilities. The construction of the Preston Western Distributor Road between Lea Gate and a new Junction 2 onto the M55 will improve the accessibility of Warton from the motorway network and the connectivity between the two locations of the Lancashire AEM Enterprise Zone at Warton in Fylde and Samlesbury in South Ribble.
- 2) **Elswick,** which is identified as a Tier 1 Larger Rural Settlement scores below Singleton and Weeton in the Settlement Hierarchy on page 17. Singleton and Weeton are both Tier 2 Smaller Rural Settlements, based on their services and facilities. Consequently, Elswick should be re-designated as a Tier 2 Smaller Rural Settlement in the emerging Local Plan.

6.0 Appendix

Scoring for Bus Services

Ansdell													
Bus	Bus service from Church Road, Ansdell to...												Number per hour
	BLACKPOOL	Squires Gate	St Annes	Lytham	Warton	Freckleton	Wrea Green	Kirkham	Wesham	Elswick	Little Eccleston	PRESTON	
7													4
11													4
68													4
76													1
													13

Score: Total buses per hour + No. destinations $13 + 23 = \underline{36}$

Clifton									
Bus	Bus service from Lodge Lane, Clifton, to...								Number per hour
	BLACKPOOL	Singleton	Weeton	Wrea Green	Newton	Kirkham	Wesham	PRESTON	
75									1
61									2
									3

Score: Total buses per hour + No. destinations $3 + 12 = \underline{15}$

Elswick										
Bus	Bus service from the Ship Inn, Elswick, to...									Number per hour
	BLACKPOOL	St Annes	Ansdell	Lytham	Kirkham	Wesham	Wrea Green	Little Eccleston	PRESTON	
76										1
80 / 82										1
										2

Score: Total buses per hour + No. destinations 2 + 10 = **12**

Freckleton										
Bus	Bus service from the war memorial, Freckleton, to...									Number per hour
	BLACKPOOL	Squires Gate	St Annes	Ansdell	Lytham	Warton	Kirkham	Wesham	PRESTON	
68										4
78										2
										6

Score: Total buses per hour + No. destinations 6 + 13 = **19**

Kirkham																	
Bus	Bus service from Poulton Street, Kirkham, to...																Number per hour
	BLACKPOOL	St Annes	Ansdell	Lytham	Warton	Freckleton	Wrea Green	Wesham	Elswick	Treales	Little Eccleston	Singleton	Weeton	Newton	Clifton	PRESTON	
75																	1
76																	1
77																	<1
78																	2
61																	2
X61																	1
																	7

Score: Total buses per hour + No. destinations 7 + 35 = 42

Little Eccleston										
Bus	Bus service from Garstang Road, Little Eccleston, to...									Number per hour
	BLACKPOOL	St Annes	Ansdell	Lytham	Kirkham	Wesham	Wrea Green	Elswick	PRESTON	
76										1
80 / 82										1
42										1
										3

Score: Total buses per hour + No. destinations 3 + 11 = 14

Lytham

Bus	Bus service from The Square, Lytham, to...												Number per hour
	BLACKPOOL	Squires Gate	St Annes	Ansdell	Warton	Freckleton	Wrea Green	Kirkham	Wesham	Elswick	Little Eccleston	PRESTON	
7													4
11													4
68													4
76													1
78													2
													15

Score:	Total buses per hour + No. destinations	15 + 29 = 44
--------	---	---------------------

Newton

Bus	Bus service from Blackpool Road, Newton, to...								Number per hour
	BLACKPOOL	Singleton	Weeton	Wrea Green	Clifton	Kirkham	Wesham	PRESTON	
75									1
61									2
X61									1
									4

Score:	Total buses per hour + No. destinations	4 + 17 = 21
--------	---	--------------------

Normoss

Bus	Bus service from Staining Road, Normoss, to...		Number per hour
	BLACKPOOL	Staining	
15			2
2 / 2C			4
			6

Score: Total buses per hour + No. destinations $6 + 3 = \underline{9}$

St Annes

Bus	Bus service from St Annes Square to...												Number per hour
	BLACKPOOL	Squires Gate	Lytham	Andsell	Warton	Freckleton	Wrea Green	Kirkham	Wesham	Elswick	Little Eccleston	PRESTON	
7													4
11													4
68													4
76													1
78													2
17													2
													17

Score: Total buses per hour + No. destinations $17 + 30 = \underline{47}$

Singleton							
Bus	Bus service from Station Road, Singleton, to...						Number per hour
	BLACKPOOL	Weeton	Kirkham	Newton	Clifton	PRESTON	
75							1
							1

Score: Total buses per hour + No. destinations 1 + 6 = 7

Staining			
Bus	Bus service from Chain Lane, Staining, to...		Number per hour
	BLACKPOOL	Normoss	
15			2
			2

Score: Total buses per hour + No. destinations 2 + 2 = 4

Squires Gate								
Bus	Bus service from Squires Gate Lane (western end), to...							Number per hour
	BLACKPOOL	St Annes	Andsell	Lytham	Warton	Freckleton	PRESTON	
1								3
7								4
11								4
68								4
								15

Score: Total buses per hour + No. destinations 15 + 16 = 31

Treales					
Bus	Bus service from the Grapes Hotel, Wrea Green, to...				Number per hour
	Wesham	Kirkham	Clifton	PRESTON	
77					<1
					<1

Score: Total buses per hour + No. destinations 1 + 4 = 5

Warton										
Bus	Bus service from the Pickwick Tavern, Warton, to...									Number per hour
	BLACKPOOL	Squires Gate	St Annes	Ansdell	Lytham	Freckleton	Kirkham	Wesham	PRESTON	
68										4
78										2
										6

Score: Total buses per hour + No. destinations $6 + 13 = \underline{19}$

Weeton							
Bus	Bus service from Station Road, Singleton, to...						Number per hour
	BLACKPOOL	Singleton	Kirkham	Newton	Clifton	PRESTON	
75							1
							1

Score: Total buses per hour + No. destinations $1 + 6 = \underline{7}$

Wesham

Bus	Bus service from Station Road, Wesham, to...														Number per hour
	BLACKPOOL	St Annes	Andsell	Lytham	Warton	Freckleton	Wrea Green	Kirkham	Elswick	Treales	Little Eccleston	Newton	Clifton	PRESTON	
76															1
77															<1
78															2
61															2
X61															1
6															

Score: Total buses per hour + No. destinations 6 + 29 = 35

Wrea Green

Bus	Bus service from the Grapes Hotel, Wrea Green, to...								Number per hour
	BLACKPOOL	St Annes	Andsell	Lytham	Kirkham	Wesham	Elswick	Little Eccleston	
76									1
1									

Score: Total buses per hour + No. destinations 1 + 8 = 9

Wharles has no bus service