

From: Alban Cassidy <AlbanCassidy@cassidyashton.co.uk>
Sent: 03 September 2020 15:36
To: PlanningPolicy
Subject: Fylde Local Plan Partial Review
Attachments: 8909-L01 _Rev A_ Location Plan.pdf

We refer to the above and hereby submit brief representations on behalf of Home Farm in respect to objections to the Partial Review.

We request the right to appear at any Public Examination at which point we will submit additional statements as appropriate.

We also confirm that I would like to be informed of each of the following:

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

In respect of our objections to the Partial Review, these are summarised below as follows:

As a general comment, we object to the lack of aspiration in the local plan review. The delivery of sustainable housing remains a key element of Government policy and is emphasised through the need to “Build, build, build” to help the economy recover. The local plan review provides an opportunity for Fylde to make a greater contribution to this agenda but has failed to do so. It should be more positively worded in terms of encouraging further, quality development.

Para. 1.24-1.27

The issue of the Duty to Co-operate and the unmet need for Wyre has been continually pushed into the long grass over several years. When the issue was raised by Wyre Council during the examination into the current Local Plan, the Council's position was that because Fylde were ahead of Wyre in the Plan cycle it was not possible to estimate an accurate requirement of Wyre's unmet need and therefore it was appropriate to adopt the plan and address the issue through a partial review. Since then, Wyre have adopted their plan and identified a shortfall of 380 dwellings which they intend to address through their own partial review, ideally within their own Borough, but as Fylde acknowledge in this partial review, it may be necessary for this to catered for in Fylde. Although there are vague comments that the flexible housing requirement of 275-415 dwellings post 2019 will allow for this, in actual fact the matter is not being addressed and conceivably could continue on this basis as the two Local Plans are unlikely ever to be synchronised.

This is totally at odds with the planned approach and the duty to cooperate which remains part of the existing planning process.

As such, Fylde should address this matter now, once and for all and identify additional land specially to cater for Wyre's unmet need. As this will result in an additional allocation or allocations, the starting point should be the strategic locations for development of which Lytham St Annes is the largest and most sustainable.

The most appropriate site in this context is land west of North Houses Lane, Lytham St Annes [attached], which, particularly now that funding for the Lytham Moss Link Road has been confirmed, represents the most suitable site in the Borough for an additional strategic location which can address the unmet need within the Housing Market Area as a whole.

By pushing this to a future decision yet again, the very soundness of the plan is undermined.

Para. 1.42

There is a requirement as acknowledged in the partial review to rely on up to date information. Unfortunately, the current global pandemic has had an unknown impact upon the development industry. Although the evidence base refers to this, it remains an unknown and it is inappropriate not to take this into account. It is therefore essential that this data is continually updated to take the effects of the pandemic into account.

Policy DLF1

It remains ironic that despite promoting a policy that identifies Strategic Locations for Development, the majority of allocations have remained outside of the key settlement and principle Strategic Location for Development, Lytham St Annes.

The largest allocation at Queensway is only making slow progress and has resulted in alternative funding having to be found to complete the link road.

In line with the comments relating to para. 1.24 to 1.27 above, it is therefore appropriate that this location is given priority in identifying an additional site[s] to address the unmet need in Wyre.

Para. 9.10-9.19 and Policy H1

We repeat reference to the impacts of Covid 19 in respect of an impact to delivery rates which are likely to be exacerbated over several years as the economy seeks to recover. Additional land should be identified under Policy H1 in accordance with the comments above.

Para. 9.67

It is acknowledged that the annual affordable housing requirement is 249 dwellings but that this cannot be achieved. However, the delivery of affordable housing should remain a key aspiration and it should be acknowledged that these are more likely to be delivered through strategic development sites.

I would be grateful for an acknowledgement of our representations.

Regards

Alban Cassidy

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REPRESENTATIONS TO FYLDE LOCAL PLAN PARTIAL REVIEW

HALLAM LAND MANAGEMENT LTD

Date: September 2020

Pegasus Reference: GL/AD/P20-2070/R001v2

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1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Hallam Land Management Ltd (HLM) to make representations to the Fylde Local Plan Partial Review consultation, which ran between 23rd July and 3rd September.

HLM's Land Interests

- 1.2 HLM have held historic interests in two associated land holdings, totalling 31.8 Ha, to the north and west of Warton for many years which have been promoted through a combination of applications and the Local Plan process. The sites are known as Blackfield End Farm, and Clifton House Farm, as shown on the plan below (which is attached at **Appendix 1**).

Fig 1.1 - HLM Ownerships in Warton

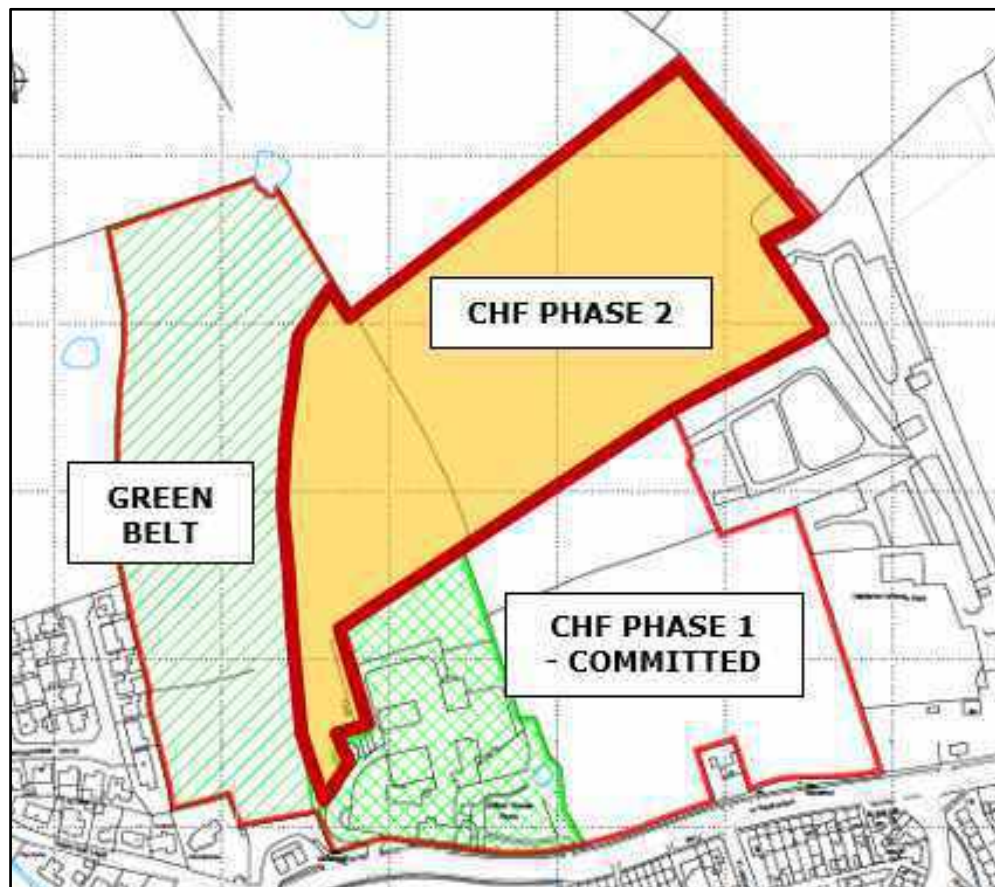


- 1.3 Blackfield End Farm comprises two parcels of land either side of Church Road, to the north of Warton, and covers a total area of 18.4 Ha. A large proportion of this site, amounting to the 13.2 Ha outside the Green Belt, was the subject of an appeal for residential development of up to 360 dwellings (Ref: APP/M2325/A/14/2217060), which went to Public Inquiry in October 2014 and was approved by the Secretary of State on 24th September 2015. Reserved Matters consent for 331 dwellings was secured in 2018 and is now under construction with Miller Homes developing to the north/east of Church Road, and Stewart Milne Homes to the south/ west.
- 1.4 Clifton House Farm comprises a 13.4 Ha parcel of land to the west of Warton, beyond the existing caravan park and is accessed off Lytham Road. A 3.74 Ha section of this site was the subject of an appeal for up to 115 dwellings (Ref: APP/M2325/W/15/3141398) which went to Public Inquiry in July 2016 and was approved by the Secretary of State on 13th February 2017. HLM subsequently received Reserved Matters consent for 96 dwellings on the site in March 2020 and are in advanced discussions with a housebuilder to bring the site forward.

Clifton House Farm Phase 2

- 1.5 Hallam are still in control of the remainder of this land at Clifton House Farm, and are seeking to promote the remaining **5.9 Ha** outside the Green Belt it for development through the Local Plan Review. Hereafter this is referred to as 'Clifton House Farm Phase 2' (CHF2), as shown below.

Fig 1.2 - Additional HLM land west of Warton (Clifton House Farm Phase 2)



- 1.6 The site has capacity to provide **175 - 200** residential dwellings, and represents the next logical location for growth in Warton by rounding off the west of the settlement, with minimal impacts. It also offers potential infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments at Clifton House Farm and Blackfield End Farm; with more detail provided in section 3.

Representation Structure

- 1.7 The structure of these representations takes the following form:
- In **Section 2** we analyse Warton as a settlement, and its growth in recent years.
 - In **Section 3** we describe the proposed development at Clifton House Farm, Phase 2.
 - In **Section 4** we raise some procedural issues with the Partial Review in respect of the plan period, consultation stages and the evidence base.
 - In **Section 5** we comment on the housing requirement and proposed changes to Chapters 1, 5 and 9 (including policies DLF1 and H1).
 - In **Section 6** we look at housing supply in more detail, based on our findings from section 5 (which also relate to proposed changes to Chapters 1, 5 and 9, including policies DLF1 and H1).
 - In **Section 7** we address the proposed changes to the other policies (Chapters 7 onwards).
 - In **Section 8** we summarise and conclude our representations.

2. WARTON SETTLEMENT ANALYSIS

- 2.1 Warton is a settlement with a population of approximately 3,600 people. It is adjacent to the settlement of Freckleton, which is located to the east and connected via the A584 Lytham Road, which is the main route through Warton running east to west. The combined urban area of Freckleton and Warton has a residential population of approximately 9,500 people (according to the 2011 Census)¹.

Figure 2.1 – Aerial of Warton and Freckleton



- 2.2 Warton is home to a large BAE Systems facility, which includes areas of land that have been designated as an Enterprise Zone as part of the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), described in more detail below. Other large employers in the area include the Land Registry, which occupies offices located to the south west of Warton.
- 2.3 Warton includes a number of day-to-day services and facilities including:
- Education - 2 x Primary Schools, 2 x day nurseries;
 - Social - 2 x Churches, Village Hall, Scout Hut, 2 x Public Houses, Social Club;
 - Recreational- Bridges Playing Fields, Play Area, BAE Sports and Social Club; and
 - Retail - Tesco/ Subway and parade of shops on Lytham Road, Coop Harbour Lane, Petrol Station.

¹ More recent population data is available but focuses on the Warton Ward which covers a much larger rural area.

-
- 2.4 Freckleton also has a medical surgery and dentist, and a range of shops and other services.
- 2.5 Lytham is located 5.5km to the west of the application site and is separated from Warton by Green Belt land. Kirkham is located approximately 5.5km to the north and is also largely separated by Green Belt land.

Warton Enterprise Zone

- 2.6 Warton Aviation Enterprise Zone is a 75 Ha site situated alongside BAE Systems' existing operation at Warton and is focussed on advanced engineering and manufacturing, and is joint with a similar 72 Ha Enterprise Zone adjacent to the BAE facility at Samlesbury, within South Ribble, which is also focussed on advanced engineering and manufacturing. These two facilities formed the original Lancashire's Advanced Manufacturing and Engineering Enterprise Zone established in 2012.
- 2.7 This EZ has since been expanded to include two further sites at Blackpool Airport in Blackpool (focussing on Energy, Wind, Nuclear & Waste to Energy) and Hillhouses, within Wyre (focussing on Energy, Chemicals and Polymers) and is now known as the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC).
- 2.8 These four sites represent the largest number of EZs to be awarded to a single LEP area, and these form a key part of Northern Powerhouse economic and investor offer, with the aspiration of creating over 10,000 high value jobs.
- 2.9 The EZ sites have a strong, complementary industrial focus which build on Lancashire's national and international strengths. Indeed, Lancashire's aerospace & supply chain industry already employs more than 30,000 people, representing the single largest concentration of aerospace activity in the UK, while North West England is rated as the fourth-largest aerospace cluster globally.
- 2.10 In terms of the Warton, this is the UK's only private fast-jet testing facility and recently the added the new state-of-the-art £2.3m Training and Simulation Integration Facility (TSIF). This was developed in collaboration with Williams Advanced Engineering. The TSIF forms part of a wider investment in training from BAE Systems with more than £10m investment in training and simulation facilities at its Warton site.
- 2.11 Other occupiers include global management consultancy Accenture and worldwide specialists in calibration and asset management services, Trescal, which works in industries such as aerospace, automotive and defence.
- 2.12 Much of the early investment in the original Lancashire's Advanced Manufacturing and Engineering Enterprise Zone was focussed on Samlesbury; including a new access from the A59 to the BAE Academy for Skills and Knowledge Training Centre and Wincanton Defence Logistics Facility. Recently, a £9.5 million public/private investment in an open access 5G industrial testbed called the 5G-Factory of the Future programme was announced. This is due to bolster the North-West's

reputation as an area of innovation and expertise. The Advanced Manufacturing Research Centre (AMRC) is a part of a consortium that includes: BAE Systems; IBM; Three (the telecoms and private 5G network provider); MTT (an SME developer of digitalisation technologies for machine tools, based in Burnley) and Miralis (a Lancashire based data-driven logistics specialist). The AMRC is expected to be fully operational on the site by the end of 2020.

Warton Strategic Location for Development

- 2.13 Warton was designated as one of 4 Strategic Locations for Development within the adopted 'Fylde Local Plan to 2032', mainly due to the presence of the Enterprise Zone and BAE Systems complex, combined with a relative lack of physical constraints.
- 2.14 Accordingly, Policy SL3 included 8 allocations within Warton in a range of sizes (from 16 dwellings up to 360) with a total capacity of **1,305 dwellings**. All of these now have planning permission with the majority under construction or with an end user confirmed. These have been supplemented by a number of smaller windfall developments in recent years.

Housing Supply and Delivery in Warton

- 2.15 The latest five year housing supply position in Warton is set out in the Council's Annual Position Statement (APS)² which was issued for consultation in June 2020 before submission to PINs and is summarised below, supplemented with our latest understanding in the comments section.
- 2.16 This Draft APS document is an update of the 2019 APS which was approved on 6th May 2020 (following a successful High Court challenge by the Council), confirming that Fylde could demonstrate a **5.1 year supply** of deliverable housing sites at 1st April 2019.

Figure 2.2- Warton Housing Commitments

Site Name	Site allocation	HLAS Site Ref	Planning application no.	No consented	Comp to date	Due in next 5 years	Comments
Allocations							
Blackfield End Farm (North/ East of Church Road)	HSS2	2A1020	13/674 OL 17/129 RM	170	31	139	Local Plan allocated site. Full planning permission for whole site, delivery commenced by Miller Homes, with completions.
Blackfield End Farm (South/West of Church Road)			13/0674 OL 18/0568 RM 19/0636 FULL	164	0	150	Local Plan allocated site. Full planning permission for whole site, construction commenced by Stewart Milne 2018-19, first completions expected to be recorded in early 2020-21, SM website shows 11 finished homes released and available June 2020.
Highgate Park	HSS7	2A879	13/0674 OL 18/0568 RM 19/0636 FULL	254	184	70	Local Plan allocated site. Full planning permission for remaining dwellings, Barratt on site. Delivery shown at standard rate (30 dpa) but this is below the rate of delivery achieved last year (51).

² Appendix 1/ Page 36.

Riversleigh Farm	HS24	2A985	12/0550 OL 13/0786 RM 15/706 RM	82	82	0	Completed
Nine Acres Nursery/ Meadows View	HS25	2A765	13/0526 FULL	75	75	0	Completed
George's Garage	S26	2A955	10/0766 OL 11/0816 RM	7	7	0	Completed
Oaklands Caravan Park	HS27		14/0833 FULL 15/0187 FULL 16/0986 FULL 13/0562 OL 17/0047 FULL 17/0383 FULL 17/0765 FULL	53	0	0	Likely to remain in use as a caravan park with residential permissions unimplemented.
Land North of Freckleton Bypass	HSS12		15/194 OL 20/0042	350	0	120	Local Plan allocation. Outline planning for 350 dwellings. Reserved matters app received 24/1/2020 for 350 dwellings for Countryside Properties; also full planning application received 31/1/2020 for additional 14 dwellings. Delivery rate is in line with earlier projections for the site, already reduced to recognise there would be a single developer; however Countryside Properties known to have higher delivery rates, so figure shown is considered very conservative.
Clifton House Farm	HSS13		14/0410 OL 17/0851 VOC 19/0195 VOC 19/0908 20/0042 RM 20/0057 FULL	96	0	75	Local Plan allocated site. Full planning permission (reserved matters approval granted 23/3/2020). Delivery rates adjusted in accordance with pre-consultation engagement from promoter, reflecting impact of COVID-19. Promoter now in advanced discussions with housebuilder.
Windfall Sites							
Brook Mount, 4 Lytham Road, Warton			19/0541 FULL	0	0	26	Windfall site, previously-developed land within settlement, identified on brownfield land register. Full planning application received 2/7/2019. Not yet consented.
Great Carr Side Farm, Wrea Brook Lane, Warton		2A885	15/0562 OL 17/1050 19/0926 RM	3	0	3	Small site with full planning permission
Warton Hall Farm, Lodge Lane, Warton		2A952	14/0669	-1	0	-1	Anticipated loss.
Barn, Warton Hall Farm, Lodge Lane, Warton		2A951	14/0590	1	0	1	Small site with full planning permission
Rose Cottage, Bryning Lane, Warton		2A1131	17/0031 FULL	1	0	1	Small site with full planning permission
121-123 Lytham Road, Warton			18/0001 FULL	1	0	1	Small site with full planning permission
206-208 Lytham Road, Bryning with Warton			19/587	1	0	1	Small site with full planning permission
Sykes Hall Farm, 99 Church Road, Warton			19/847	1	0	1	Small site with full planning permission
TOTAL				1,258	379	587	

2.17 The table above shows that 1,258 dwellings have been consented in Warton, which is 96% of the total capacity allocated in the adopted plan, with 12 years of the plan period remaining. Of those

1,258 a total of 379 (30%) have been completed with a further 587 (47%) due for completion in the next 5 years, leaving just 292 dwellings (23%) to be delivered in the final 7 years of the plan period.

2.18 This drop off in supply in Warton towards the end of the plan period can be seen in the Council's full plan trajectory³ which suggests average annual delivery rates of 112 dpa between 2020 and 2027, then just 26.4 from 2027 to 2032.

2.19 This trend of dwindling supply towards the latter stages of the plan period is also evident across the Borough as a whole and we revisit this in section 6.

Summary

2.20 Overall, this demonstrates that Warton is a strong market location that is delivering housing across a range of sites, which is expected to continue at an elevated rate in the coming years. As such it is considered a suitable location to allocate further land, particularly given supply is likely to dip towards the latter stages of the plan period.

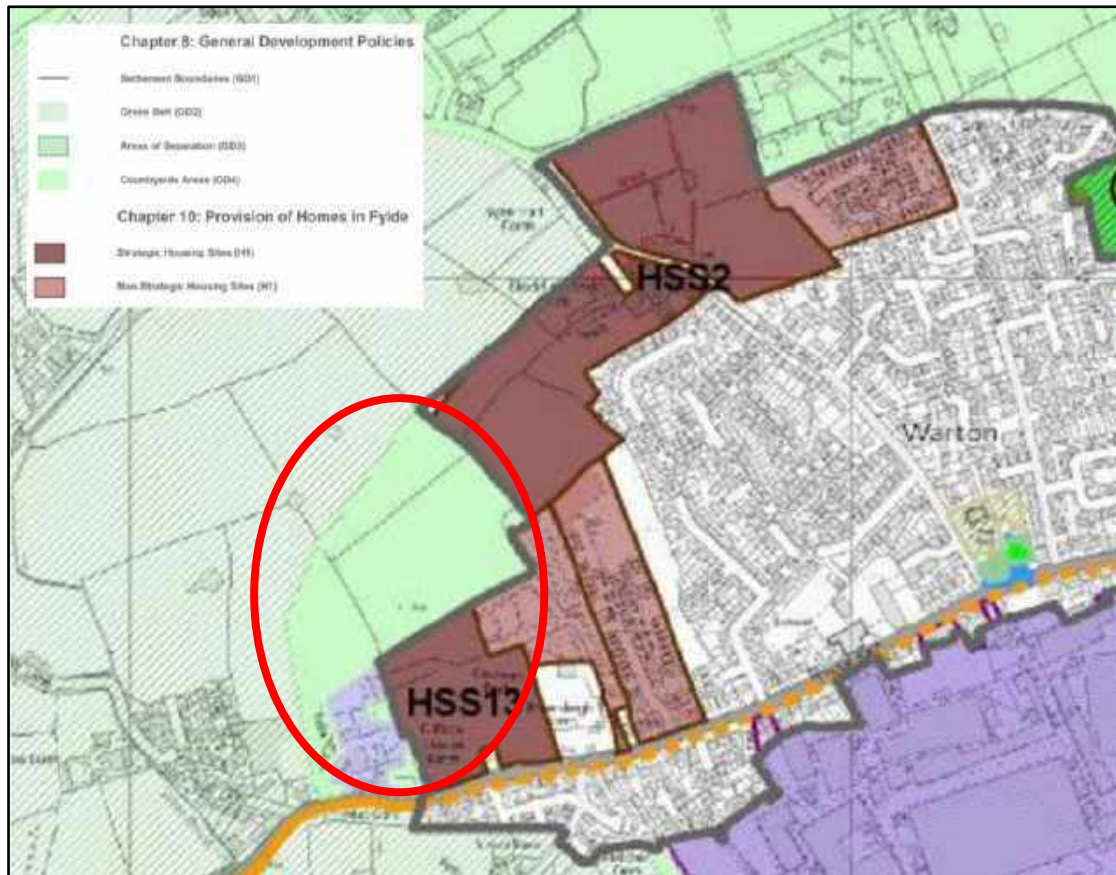
2.21 The land at Clifton House Farm Phase 2 represents the next logical location for growth in Warton by rounding off the west of the settlement, and can also serve those longer term supply needs towards the latter stages of the current plan period (2026 onwards), when Clifton House Farm Phase 1 and Blackfield End Farm are due to be complete.

³ Appendix 2/ Page 50.

3. PROPOSED DEVELOPMENT

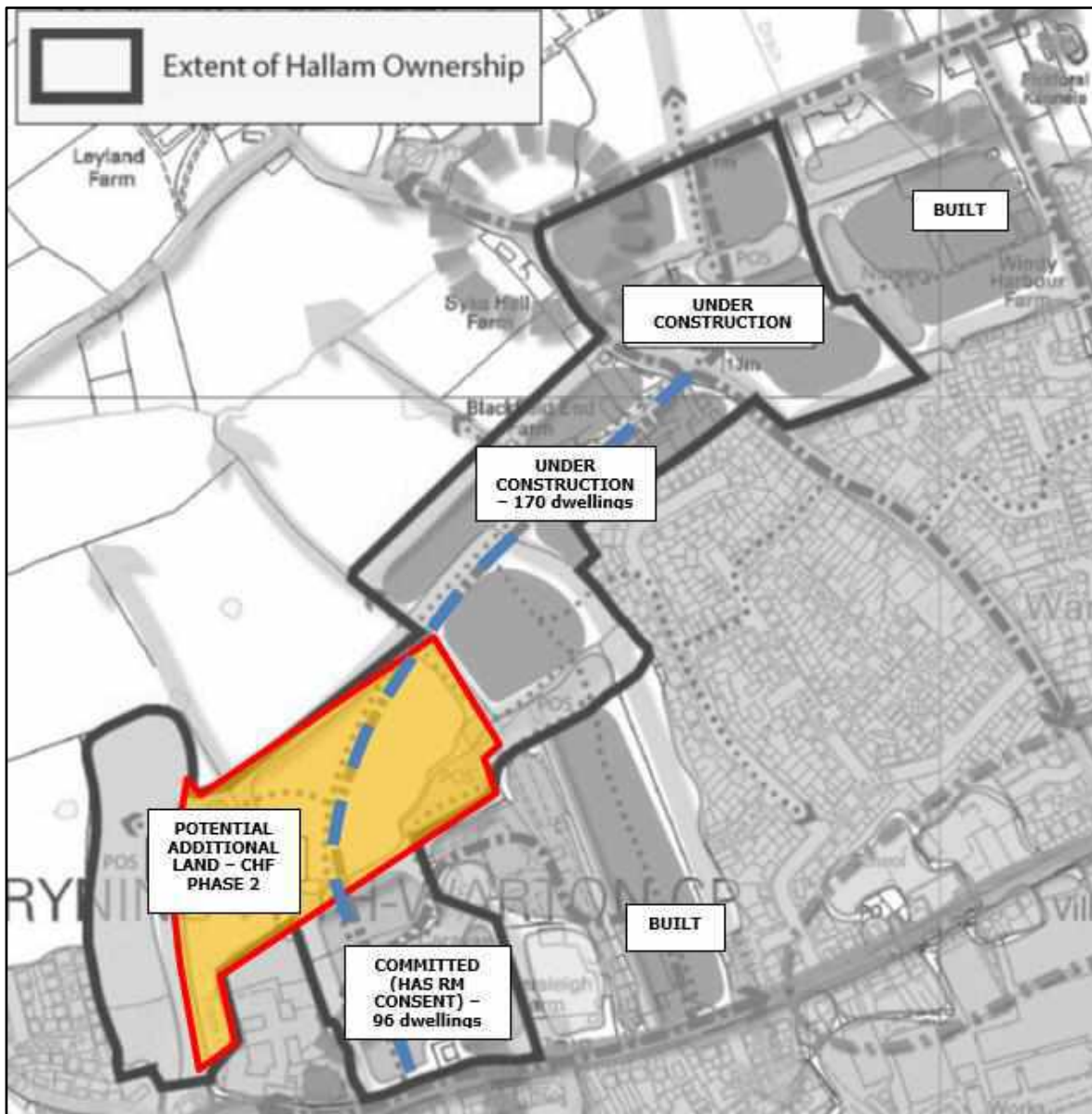
- 3.1 Hallam are still in control of the **9.66 Ha** of unallocated land at Clifton House Farm. This lies outside the existing settlement boundary, with **3.76 Ha** falling within the Green Belt; however the remaining **5.9 Ha** is within the open countryside and represents an obvious and highly sustainable opportunity for rounding off the settlement, infilling the gap between the two existing allocations at Clifton House Farm and Blackfield End Farm, as highlighted below.

Figure 3.1 – Adopted Proposals Map Extract



- 3.2 Hereafter this land is referred to as 'Clifton House Farm (CHF) Phase 2', and is highlighted red on Figure 3.2 over the page, with the grey line showing HLMS full historic ownership as well as adjacent committed and completed schemes, as well as the route of a potential link road through the site.
- 3.3 The site has capacity to provide **175 - 200** residential dwellings, based on standard net density of 30 – 35 dph, which can be delivered with minimal environmental or amenity impacts. It provides an obvious location for growth in Warton by rounding off the west of the settlement, with minimal impacts. It also offers the potential for significant infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments at Clifton House Farm and Blackfield End Farm.

Figure 3.2 – Clifton House Phase 2 – Concept Masterplan for West Warton



3.4 The link road is a real and deliverable prospect as it has been factored into both the outline and Reserved Matters approvals for:

- **Clifton House Farm (Phase 1)** – Reserved Matters was approved on 20th March 2020 (Ref: 19/0926) for 96 dwellings. Approved layout (Ref: 1324-PL-01 Rev F) shows a spine road from Lytham Road running north right up to the boundary with CHF 2, and is attached at **Appendix 2**.
- **Blackfield End Farm** – Reserved Matters was approved on 7th November 2018 (Ref: 18/0586). Approved layout (Ref: SK275/PL/101 Rev F) shows a spine road running from Church Road south west right up to western boundary with CHF2, and is attached at **Appendix 3**.

3.5 Extracts of these plans are also shown below with the connection points to CHF 2 highlighted.

Figure 3.3 – Approved Layouts Showing West Warton Link Road

Clifton House Farm (Phase 1)



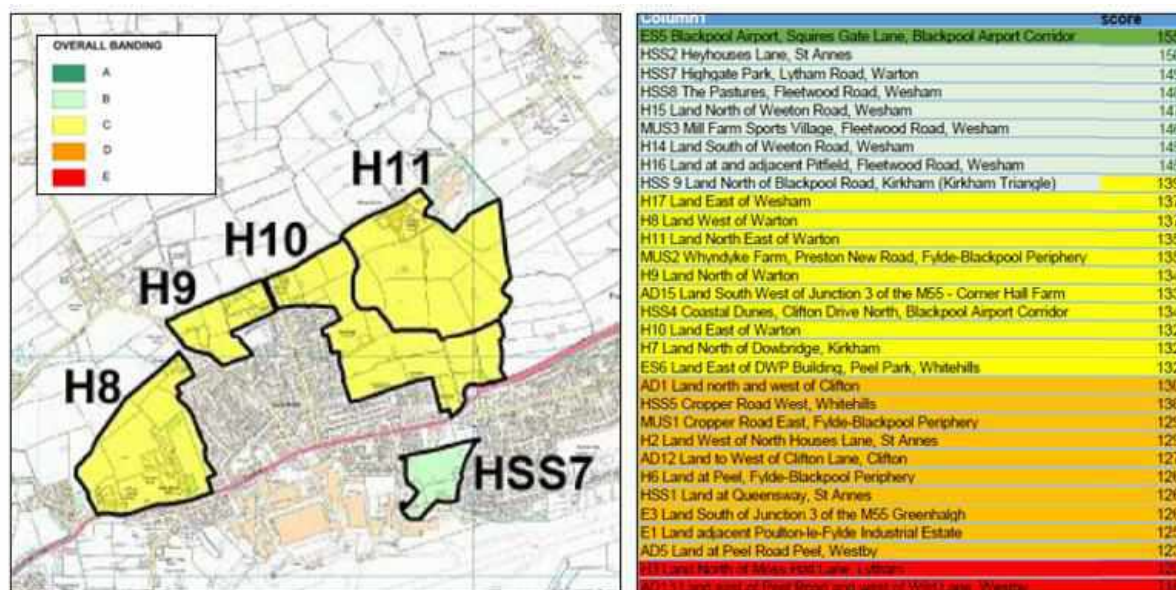
Blackfield End Farm



Historic Assessment of Clifton House Farm Phase 2

- 3.6 Given the narrow scope of this Local Plan Review, which we address in more detail in sections 4-6, there is no up to date assessment of sites in the evidence base, as the Sustainability Appraisal does not consider sites and there is no supporting Site Assessment Paper or SHLAA.
- 3.7 As such, the most recent evidence on sites is that which supported the adopted plan, and this assessment did consider the land at CHF Phase 2. Indeed, it was assessed alongside Clifton House Farm Phase 1/ Allocation HSS13, under Strategic Site H8 in the original Preferred Options Local Plan (2015), and was assessed as part of the 2013 SA relevant at the time. It was deemed to be a suitable, available and deliverable site for housing development.
- 3.8 Strategic Site H8 was also assessed more thoroughly within the Strategic Site Assessment (Council document reference ED028 a-g), in December 2015. Within this assessment it achieved a score of 137, which ranked equal 10th out the 31 sites assessed, and joint second for sites in Warton, behind the Highgate Park site, which is a brownfield former employment site, and joint with site H11 to the north east of Warton, which has not been allocated or promoted for development. The overall assessment table and associated map from ED028b is attached at **Appendix 4** and extracts are also provided below for ease of reference.
- 3.9 This clearly demonstrates that Site H8, which was only been part allocated for residential development (CHF Phase 1), was considered more sustainable than 10 other sites that were allocated for residential development (8 in full and 2 in part).

Fig 3.4 - Summary Extracts from Strategic Site Assessment, December 2015



- 3.10 Therefore, the evidence suggests that this additional 5.9 hectares in H8 should have been allocated in the adopted plan as it is available and was actively promoted through the Local plan process, and even incorporated into a wider masterplan for Warton (attached at **Appendix 5**), with a coordinated approach to transport connectivity and green infrastructure in line with the Council's adopted Policy M1 (Masterplanning the Strategic Locations for Development).
- 3.11 Accordingly, this land should be considered for allocation in the Local Plan Review as it is a demonstrably sustainable site in the Council's own evidence, will round off the settlement, will meet the longer term housing needs after 2026 and can deliver a new link road between Lytham Road and Church Road; which can be considered the final piece of the jigsaw for delivering masterplanned and coordinated growth for Warton.

4. PROCEDURAL MATTERS

- 4.1 Before looking at the individual policies and suggested revisions to the plan, we raise some procedural issues in respect of this partial review.

Plan Period

- 4.2 Paragraph 22 of the NPPF notes how strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. Whilst it might be argued that the strategic policies are unchanged from the adopted plan, the review does propose changes to the housing requirement and main Development Strategy Policy DLF1, and therefore it would seem reasonable that the Local Plan Review should consider an extended plan period to cover till 15 years from adoption (so 2036/2037 depending on proposed timetable, rather than 2032 as per the current plan).

Lack of Defined Consultation Stages

- 4.3 In respect of consultation on this Partial Review we note the Council's intention to submit this plan for Examination after this consultation along with the representations received. As such this effectively represents the Regulation 19 Submission consultation, with last year's Scoping consultation comprising the Regulation 18.
- 4.4 Whilst this is loosely referenced within the Statement of Consultation (**SDPR07**) it is far from clear in the main consultation document (**SDPR01**) or on the Council's website and notification emails, with no mention of Regulation 19 anywhere.
- 4.5 It is acknowledged that this comprises a partial review with a narrow scope, however there is no special provision for this within the regulations, namely the 'Town and Country Planning (Local Planning) (England) Regulations 2012', nor in the PPG; neither of which distinguish between partial and full Local Plan Reviews.
- 4.6 As such, it is our view that this consultation should have been formally publicised as the Regulation 19 submission stage, and could well have prejudiced those who hadn't realised that this was the last opportunity to submit representations. On this basis, the Council should consider a further consultation period to ensure a robust consultation process, otherwise the plan could be challengeable.

Duty to Cooperate

- 4.7 I note the submission documents include a Draft Statement of Common Ground (**SDPR05**), dated March 2020, between Fylde, Wyre, Blackpool and Lancashire County Council to deal with strategic cross-boundary matters.
- 4.8 Whilst we welcome this engagement across the Fylde Coast sub region, which has been confirmed as a joint housing market area (HMA) in the most recent SHMA (2014), and has also had issues

with unmet need (which has driven the need for this review); we would question the status of this draft given that it doesn't appear to have been signed by anyone, so it is unclear what level of buy-in it has had from the other authorities, and this is important in the context of our comments in section 5.

Planning for the Future White Paper – August 2020

- 4.9 Since this consultation began, the government have published the 'Planning for the Future White Paper' (August 2020) and supporting 'Changes to the current planning system' document for consultation until October 2020.
- 4.10 The White Paper proposes a number of significant changes to the Local Plan making process, including changes to the standard methodology, which generate massively increased housing requirements in England when compared to the current calculations, and the introduction of a zoning system which introduces three types of land; 'growth areas' suitable for substantial development (with automatic outline consent for types of development specified in the Plan), 'renewal areas' suitable for some development, and 'protected areas' where development is restricted; and we provide further comment on these matters in sections 5 - 7.
- 4.11 Whilst only draft at this stage (and subject to any amendments resulting from the current consultation), the changes could be introduced through a Written Ministerial Statement in Autumn this year⁴, and therefore could well have a significant bearing on any emerging plan including the Fylde Partial Review.
- 4.12 In respect of timeframes and transitional arrangements, page 41 of the White Paper proposes a statutory duty for Councils to have a new Local Plan in place within 30 months (2.5 years) of the legislation coming in, i.e. by mid-2023; or 42 months if their current plan was adopted within the last 3 years (as Fylde's is), i.e. by mid-2024.
- 4.13 In light of this, it would seem prudent for Fylde to take account of the proposed changes now and begin a more formal Review, as even if they were to adopt this partial review by early 2021, it would unlikely to stay in place for 5 years as it would require updating under the new system by mid-2024 as set out above; and given the significance of the changes proposed local authorities should be giving themselves as much lead-in time as possible to get a new style plan in place.

⁴ Paragraph 84, Changes to the current planning system paper (August 2020).
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907215/200805_Changes_to_the_current_planning_system_FINAL_version.pdf

5. HOUSING REQUIREMENT & DEVELOPMENT STRATEGY

- 5.1 The Fylde Partial Review has a very narrow scope, as set out in paragraph 1.27 of the adopted plan, and confirmed in last year's Regulation 18 scoping consultation, to deal with potential unmet need in Wyre, which was thought to be 380 dwellings at the time of adoption. Wyre made the case in their adopted plan that they were unable to meet their needs in full due to environmental and highways constraints.
- 5.2 Wyre undertook a similar scoping consultation for their Partial Review in February 2020 on the same narrow basis, but have yet to follow this with any further consultation or assessment.
- 5.3 As such, the Fylde consultation documents represent the most up to date evidence on this matter most notably the Housing Needs and Requirement Background Paper March 2020 (**EDPR04**).

Fylde's Proposed Housing Requirement

- 5.4 In short, section 3 of this paper asserts that the current standard method figure is **275 dpa** and that it represents the most appropriate housing need figure for Fylde going forward, rather than the adopted figure of **415 dpa**, with no exceptional circumstances to support any uplift to this.
- 5.5 This is justified on the basis that the standard method has a similar basis to the adopted requirement, which comes from the 2014 Fylde Coast SHMA with the demographic starting point being largely the same (256 dpa in the SHMA Addendum 3 and 253 in the standard method), whilst the uplifts, to account for in-migration to support job growth in the adopted requirement vs an affordability uplift in the standard method, address the same consideration (i.e. demand/ scarcity of dwellings).
- 5.6 On this basis they propose to apply the standard method figure for the remainder of the plan period. As such they now put their housing requirement forward as a range in Policy DLF1, with the higher end reflecting the adopted requirement of 415 dpa and the lower end based on the reduced standard method figure of 275 from 2019/20 onwards. This generates a total target range of **6,895 – 8,715 dwellings**. They have also sought to remove specific distribution targets from strategic and non-strategic sites and just leave these as percentage figures (90% and 10% respectively).
- 5.7 In terms of the implications on the wider Fylde Coast HMA, and potential unmet need in Wyre, they propose the same approach, using the standard method target (which for Wyre drops from **460 dpa** in the adopted plan to **308 dpa** and for Blackpool from **280 dpa** to **114 dpa**). They again argue that there are no exceptional circumstances to depart from this, again using the rationale that the standard method has a similar basis to the adopted requirements from the 2014 Fylde Coast SHMA (all 3 authorities used were subject to the same approach given they are all in one HMA).
- 5.8 This leads to a reduction in annual need across the Fylde Coast from **1,155 dpa** to **697 dpa**, a drop of 40%.

- 5.9 On this basis Fylde argue that there is no longer any unmet need in Wyre (or the wider HMA) as this was based on an OAN requirement of 479 dpa, and therefore that there is no need for Fylde or Wyre to allocate any additional sites. Instead Fylde propose to soften their requirement by introducing a range as set out above.

Proposed Revisions to Standard Methodology

- 5.10 As noted in section 3, the government recently launched a consultation on changes to the standard method, which introduces an element of growth based on existing stock, and increased affordability uplifts, which leads to significant increases in several local authorities, including Fylde, where the indicative figure is **488 dpa**, an increase of **77%** from the current standard method (and **18%** from the adopted plan figure).

Figure 5.1 – Fylde Coast Housing Requirements

LPA	Adopted Requirement	Current Standard Method suggested in Fylde Draft SOCG (SDPR05)	Current Standard Method 2020-30 (2014 HHP / 2019 Aff Rates)	Current Standard Method 2020-30 (2018 HHP / 2019 Aff Rates)	Government's Proposed Changes (0.5% stock increase + affordable uplifts)
Blackpool	280	114	121	40	303
Fylde	415	275	272	466	488
Wyre	460	308	296	430	383
Fylde Coast HMA Total	1,155	697	689	936	1,174

- 5.11 It also generates a total need figure of **1,174 dpa** across the Fylde Coast which is **68%** higher than the current figure claimed by the Council (697 dpa) and marginally higher (1.6%) than the total adopted requirement of the Fylde Coast.
- 5.12 Now, it is acknowledged that this new method is yet to be adopted and may be subject to some change; however it is highly unlikely to reduce given it seeks to meet the government's national target of 300,000 homes and is also deliberately seeking to boost northern authorities to correct historic imbalances, so could well rise further. In addition, it could come into force relatively quickly after the consultation period (which closes on 1st October), as it simply requires an update to the PPG, rather than any formal legislative change.
- 5.13 Finally, it is worth noting that even under the current methodology, the latest 2018 household projections and 2019 affordability ratios generates a requirement of 466 dpa, showing that underlying need in Fylde is increasing anyway, and that the proposed 275 dpa figure is far too low.
- 5.14 Accordingly, it is our strong view that the Council need to plan for a figure of **at least 488 dpa** which will require significant additional allocations, and may also need to reconsider unmet need within Wyre and potentially Blackpool with their figures rising as well.

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- 5.15 Even under the current standard method regime, there are exceptional circumstances that would support an elevated housing target above the 275 dpa.
- 5.16 Paragraph 2a-010-20190220 of the PPG sets out the circumstances when it might be appropriate to plan for a higher housing need than the standard method indicates, including where there are growth strategies for the area, strategic infrastructure improvements, where an authority has agreed to take on unmet need from neighbouring authorities, or where previous levels of housing delivery or assessments of need are significantly greater than the standard method. We address each of these in turn below.

Growth Strategies & Strategic Infrastructure Improvements

- 5.17 As noted in section 2, Warton is one of four designated Enterprise Zones which form part of the Lancashire Advanced Manufacturing and Energy Cluster (LAMEC), which is the largest number of EZs to be awarded to a single LEP area. This investment has been principally delivered through the Lancashire Growth Deal (2014), which has provided £320m to the Lancashire LEP to support economic growth in the area. The Growth Deal is helping to generate up to 11,000 new jobs, create 3,900 new homes and attract £1.2 billion of additional public and private investment for Lancashire; building on key economic assets including the EZs, universities and colleges, the Preston, South Ribble and Lancashire City Deal and high-value business clusters. There is also a £20m Growing Places investment fund (run by the Lancashire Enterprise Partnership), to support infrastructure, commercial and housing development across Lancashire
- 5.18 In respect of strategic infrastructure, the £200m Preston Western Distributor Road is under construction as part of the Lancashire City Deal, which has a direct impact on Warton by improving access to the EZ and reducing pressure on the local road network.
- 5.19 Accordingly, this clearly demonstrates that there are significant and ambitious growth strategies and infrastructure improvements in this location that could support an elevated level of housing growth to that set out in the current standard methodology.

Unmet need in adjacent authorities

- 5.20 This entire Plan Review is based around potential unmet need in Wyre based on the current adopted plan figures. The Council consider this is no longer an issue based on significantly reduced requirements in Fylde and Wyre under the current standard method; however the government's emerging method sees the requirement increase beyond adopted levels across the 3 Fylde Coast authorities, suggesting that there will be unmet need to deal with, potentially in Wyre and in Blackpool, where there are known to be land constraints.

Previous delivery

- 5.21 Figure 5.1 below sets out housing completions in Fylde over the last 5 years (2015/16 and 2019/20). This shows that annual completions have significantly exceeded the current standard

method figure by a total of 980 dwellings across the 5 years (and the adopted target of 415 dpa by 280 across the 5 years), indicating the actual need far outstrips the standard method figure.

Figure 5.2 – Housing Delivery in Fylde 2015-2020

Year	Completions	Adopted Requirement	Delivery against adopted Requirement	Current Standard Method	Delivery against Requirement
2015/16	315	415	-100	275	40
2016/17	453	415	38	275	178
2017/18	463	415	48	275	188
2018/19	490	415	75	275	215
2019/20	634	415	219	275	359
TOTAL	2,040	1,660	280	1,375	980

- 5.22 It is also worth noting that the current plan wasn't adopted until October 2018, (3.5 years into that 5 year period) meaning that much of this delivery was occurring before this target was adopted demonstrating a latent demand.
- 5.23 This is another indicator that strongly suggests that the proposed standard method figure of 275 dpa is too low and should be increased.
- 5.24 Overall, it is clear from the analysis in this section that the Council should consider adopting the revised standard method figure of **488 dpa** going forward, to save this being imposed in the coming months anyway; particularly given that it is in line with current delivery rates (with the last 2 years exceeding 488 per year), whilst the other indicators detailed in the PPG all support an increase from the current standard method figure.
- 5.25 This is likely to require significant additional allocations within the Fylde Local Plan Review, to meet Fylde's own needs as well as those of Wyre and Blackpool.

6. HOUSING SUPPLY & NEED FOR ADDITIONAL ALLOCATIONS

Council's Current 5-Year Supply Position

- 6.1 The Council have a recently adopted APS from 6th May 2020, confirming that they could demonstrate a **5.1 year supply** of deliverable housing sites at 1st April 2019.
- 6.2 Fylde have submitted an updated draft APS for 2020 following consultation in June 2020, which claims a **6.01 year supply** (which we believe should be **6.06 years** due to a counting error).
- 6.3 Given this document carries forward the methodology and delivery assumptions endorsed by the Inspector back in May 2020 on the previous APS (which has also been through the High Court) we do not wish to dispute the detailed findings on five year supply, nor did we make any representations to the June 2020 consultation.
- 6.4 That said, we do have some more general comments on the full plan period supply and how that might impact the 5 year supply position going forward, particularly if the government's proposed changes to the standard method come into force during this Local Plan Review.

Council's Total Supply

- 6.5 Firstly, I note that amended paragraph 9.16 in the plan suggests a total plan period supply of **8,819 dwellings**, which just exceeds the higher requirement range proposed in the plan (8,715 leaving a surplus of just 1.2%), and it is arguable whether this is sufficient to meet the NPPF objective of significantly boosting the supply of homes, as it allows very little flexibility in terms of providing a choice of sites, or accounting for under delivery (we would generally advocate headroom of at least 10% to provide such flexibility).
- 6.6 Notwithstanding this, the June 2020 Draft APS full plan trajectory indicates a total plan period supply of just **8,401** at 1st April 2020,⁵ which represents a shortfall of **314** homes or **3.6%** of this upper range requirement, which is clearly insufficient.
- 6.7 If the revised standard method figure is used from 2020 onwards the total requirement is 9,591 so shortfall increases to **1,190 or 14%**.
- 6.8 This confirms that the Local Plan Review will need to allocate more sites to meet both its adopted and emerging requirement.

Ongoing 5-Year Supply through Plan Period

- 6.9 In addition to considering total supply, the table over the page maps out 5-year supply across the plan period based on the trajectory in the June 2020 Draft APS set against existing and emerging requirement scenarios.

⁵ Plan period total column page 55.

Figure 6.1 - Ongoing Five Year Supply in Fylde

Year	Comp's/ Traj	Scenario 1		Scenario 2		Scenario 3	
		Partial Review Low Range Req't (current SM post 2020)	Delivery against Low Range Req't	Partial Review Proposed High Req't Range (adopted figure)	Delivery against High Range Req't	Revised Standard Method	Delivery against emerging target
2011/12	141	415	-274	415	-274	415	-274
2012/13	162	415	-253	415	-253	415	-253
2013/14	233	415	-182	415	-182	415	-182
2014/15	230	415	-185	415	-185	415	-185
2015/16	315	415	-100	415	-100	415	-100
2016/17	453	415	38	415	38	415	38
2017/18	463	415	48	415	48	415	48
2018/19	490	415	75	415	75	415	75
2019/20	634	275	359	415	219	415	219
2020/21	896	275	621	415	481	488	408
2021/22	660	275	385	415	245	488	172
2022/23	521	275	246	415	106	488	33
2023/24	560	275	285	415	145	488	72
2024/25	354	275	79	415	-61	488	-134
2025/26	571	275	296	415	156	488	83
2026/27	423	275	148	415	8	488	-65
2027/28	342	275	67	415	-73	488	-146
2028/29	317	275	42	415	-98	488	-171
2029/30	248	275	-27	415	-167	488	-240
2030/31	205	275	-70	415	-210	488	-283
2031/32	184	275	-91	415	-231	488	-304
TOTAL	8,402	6,895	1,507	8,715	-313	9,591	-1,189

Five Year Period	Five Year Traj	Scenario 1 Five Year Req't (with 5% buffer)	Delivery against Scenario 1 Five Year Req't	Scenario 2 Five Year Req't (with 5% buffer)*	Delivery against Scenario 2 Five Year Req't	Scenario 3 Five Year Req't (with 5% buffer)	Delivery against Scenario 3 Five Year Req't	5YHLS SCEN 1	5YHLS SCEN 2	5YHLS SCEN 3
2020/2025	2,991	1,444	1,547	2,470	522	2,562	429		6.06	
2021/2026	2,666	1,444	1,222	2,179	487	2,562	104	9.23	6.12	5.20
2022/2027	2,429	1,444	985	2,179	250	2,562	-133	8.41	5.57	4.74
2023/2028	2,250	1,444	806	2,179	71	2,562	-312	7.79	5.16	4.39
2024/2029	2,007	1,444	563	2,179	-172	2,562	-555	6.95	4.61	3.92
2025/2030	1,901	1,444	457	2,179	-278	2,562	-661	6.58	4.36	3.71
2026/2031	1,535	1,444	91	2,179	-644	2,562	-1,027	5.32	3.52	3.00
2027/2032	1,296	1,444	-148	2,179	-883	2,562	-1,266	4.49	2.97	2.53

6.10 This table includes the following inputs and assumptions:

- Three requirement scenarios comprising:
 - Scenario 1 – The lower range requirement proposed in the Partial Review dpa, based on current standard method figure of 275 dpa (from 2019/2020 onwards, with the adopted figure of 415 dpa before that).
 - Scenario 2 – The higher range requirement proposed in the Partial Review, based on the adopted requirement of 415 dpa across the plan period.
 - Scenario 3 – The revised standard method figure (currently under consultation), of 488 dpa (from 2020 onwards, with the adopted figure of 415 dpa before that).
- The projected supply and historic completion figures are taken directly from the full plan trajectory set out in June 2020 Draft APS (page 55).
- In terms of the buffer, we have used 5% buffer throughout, with the exception of the 2020-2025 period (highlighted orange/*) where we use 10%. This is because for the 2020-2025 period we use the supply figure that the Council are claiming within the June 2020 Draft APS (which aligns with our scenario 2) and confirming supply via this route requires a 10% buffer⁶. The 5% buffer is used everywhere else due to the Council's current and projected performance on the Housing Delivery Test, which is expected to stay above 85%⁷ until the final 3 years of the plan period; and will therefore not affect the 5 year supply calculations, as the last full 5 year period within the current plan is 2027-2032.
- We do not include any historic shortfall in the 5 year calculations, beyond the 2020-2025 period where we use the Council's figure which does take account of shortfall. This is mainly because the standard method (used in scenarios 1 and 3) does not require shortfall to be considered, on the basis that it is already factored into the affordability ratio in Step 2 of the calculation⁸. Furthermore, existing historic shortfall under scenario 2 should have been largely addressed by the 2022 based on projected completions and would not lead to a 5 year supply deficiency before then.

6.11 In summary, it is clear from the table that supply will drop below 5 years as early as 2022 under the government's proposed methodology (Scenarios 3/ 488 dpa) and by 2024 under the adopted figure (Scenario 2); and the position is even worse if historic shortfall is taken into account or if a higher buffer were to be applied.

6.12 Furthermore, whilst the Council have sought to take account of the impacts of COVID as much as possible within their latest delivery rates, based on discussions with developers; this evidence was gathered during the early stages of the pandemic before the full impacts were known, both in terms

⁶ As per NPPF paragraph 73, part b, and PPG Para 68-022-20190722

⁷ As per NPPF paragraph 73, part a/ footnote 39, and PPG Para 68-022-20190722

⁸ PPG para 68-031-20190722

of market demand and construction timetables, and therefore it is likely that circumstances will have changed, which will more than likely lead to an overall reduction in delivery rates (and we address this in more detail below).

- 6.13 This confirms that the Local Plan Review will need to allocate sites to shore up supply in the latter parts of the plan period, both in Warton and across Fylde to deliver the requirement in full and to maintain an ongoing 5-year supply.

Total Requirement

- 6.14 Using the emerging standard method figure of 488 dpa from 2020 onwards, generates a total plan period requirement of **9,591** dwellings, which increases to **10,550** if a 10% headroom is applied to allow for choice and flexibility as suggested above. This would require land for an additional **2,149** dwellings being identified within the plan review to 2032 to meet Fylde's needs alone, and even more to take account of unmet need in the adjacent Fylde Coast authorities, or if the plan period were to be extended to cover 15 years from adoption as recommended.
- 6.15 Even continuing with the adopted figure of 415 dpa, with 10% headroom, would require a total supply of 9,587, requiring land for a further 1,186 dwellings to be identified.

General Comments on Supply/ Methodology

- 6.16 In addition to the issues set out above, we also raise some other general points on housing supply and the methodology and delivery rates used by the Council within their APS.

Windfall

The Council propose a windfall rate of 40 dpa going forward (from the latter 2 years of the 5 year period), based on historic delivery and consents, which equates to 360 across the final 9 years of the plan period. Whilst this was endorsed by the Local Plan Inspector back in 2018, we raise two concerns with this going forward. Firstly, we would expect windfall delivery to naturally fall away in the coming years due to an inevitable decrease in land availability, with more land already being allocated or consented; whilst the presence of newly adopted policies and a confirmed 5-year supply will also make it more challenging to gain consent on unallocated sites. Secondly, COVID is likely to have a disproportionate impact on smaller, windfall type development, due to tightened lending/ mortgage criteria for smaller developers and private individuals who would traditionally bring this sort of development forward; as well as the potential for reduced demand in the medium term.

Impact of COVID on large site delivery

- 6.17 As noted in the previous section, the impact of COVID is likely to lead to a general reduction in delivery rates across the board. This could have a significant impact in Fylde, given its reliance on a small number of very large sites, meaning that if any of these were not taken forward, or delivery rates were to slip, it could have a significant impact on overall delivery. It is accepted that the major national housebuilders should have sufficient resources, and finance mechanisms to keep

the majority of their outlets open and delivering through the emerging recession, and should also have the technical expertise to meet associated social distancing requirements; however it may not be as easy for private developers who have fewer technical resources and face tighter lending restrictions.

- 6.18 One example of this is the Queensway site (Allocation HSS1), which has consent for 948 dwellings, and is being built out by a private developer Kensington Developments, with 53 completions to date. The APS assumes delivery of 125 dwellings in the next 5 years and a rate of 55 dpa beyond that; however this could reduce significantly or fall away entirely if they cannot secure ongoing funding or contractors who cannot remain viable with distancing restrictions in place.

Additional Allocations

- 6.19 Based on above housing need and supply analysis, there is an urgent need for Fylde to allocate additional land for up to **2,150 dwellings** to meet supply shortfalls from as early as 2022, if the government's revised standard method is brought into force.
- 6.20 Given Warton's existing designation as a Strategic Location for Development, with its Enterprise Zone, and the fact that delivery on existing allocations is due to reduce beyond 2026 (see section 2), it is an obvious location for further allocations.
- 6.21 This is further reinforced by the recent White Paper with Warton representing an obvious 'growth' area, where further sustainable residential sites adjacent to the existing settlement would expect to receive automatic outline consent.
- 6.22 Within the context of Warton, the land at Clifton House Farm Phase 2 represents the next logical location for growth, as it will round off the settlement, and will also meet longer term housing needs after 2026, as this is when the two adjacent sites at Clifton House Farm (Phase 1) and Blackfield End Farm are due for completion, thus ensuring a continued delivery pipeline to the west of Warton.
- 6.23 Finally, CHF 2 offers the potential for significant infrastructure improvements; with the ability to provide a link road across the west of Warton between Lytham Road and Church Road, through the existing committed developments (CHF1 and Blackfield End Farm).

Conclusions and Suggested Revisions to Plan

- 6.24 Based on our analysis within sections 5 and 6 we suggest that the Council adopt the emerging standard methodology figure (which currently stands at 488 dpa) from 2020 onwards, and apply a 10% supply buffer on top of this to allow for choice and flexibility. This generates a total plan period requirement of 10,550 to 31st March 2032 and based on current trajectory will require land for additional 2,150 dwellings.
- 6.25 Fylde will also need to consider unmet needs across the Fylde Coast HMA, where the requirement is also likely to increase as a result of the revised standard methodology, particularly given the well known supply constraints in both Wyre and Blackpool.

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- 6.26 Accordingly we recommend that policies DLF1 and H1, and the relevant supporting text in chapters 1, 5 and 9 is updated on this basis.

7. UPDATED POLICIES

7.1 In this section we comment on the remaining policies, where relevant, that have been updated in line with the 2019 NPPF, to take account of our analysis in section 5 and 6 and the recent White Paper:

- **Policy DLF1: Development Locations for Fylde** – See our comments within sections 5 and 6. The Local Plan should provide sites for 10,550 dwellings over the plan period to 31 March 2032, and more should the plan period be extended as suggested. Related supporting text within chapters 1 and 5 should also be updated on this basis.
- **Policy GD 7: Achieving Good Design in Development** – We do not raise any issues with the proposed revisions in respect of the 2019 NPPF, but would highlight some potential suggested in the government’s White Paper, where design is prioritised under ‘Pillar Two - Planning for beautiful and sustainable places’. The government hope to deliver this through a ‘National Model Design Code’ based on last year’s National Design Guide, to be published later this year (alongside an updated Manual for Streets), which will then be used as a template for establishing site specific design codes or ‘pattern books’ in Growth Areas as part of the permission in principle process. We are supportive of this aspiration in principle, but would stress that such Design Codes would need to be agreed at the Local Plan stage, and considered at the earliest possible stage in that process, to give developers both the certainty and time to develop detailed proposals, and the ability to engage and influence this process to ensure deliverability. Agreement at the outset, will also avoid further supplementary Local Plan processes to establish Masterplans/ SPDs etc, as these inevitably lead to delays in delivery. They will also need to include a level of flexibility and a review mechanism, should there be a change in circumstances, local vernacular, viability or national policy.
- **Policy H1: Housing Delivery and Allocation of Housing Land** – See our comments within sections 5 and 6. The Local Plan should apply a requirement of 415 dpa per annum for the period 2011-2020 and 488 dpa from 2020-2032, to provide a minimum overall requirement of 10,500 homes. Related supporting text within chapter 9 should also be updated on this basis.
- **Policy ENV2: Biodiversity** – HLM are wholly supportive of protecting and enhancing biodiversity as part of development proposals. However, where net gain is not achievable on-site, the Council will need to find alternative sites and projects where biodiversity improvements can be made, such that applicants can off-set their impacts through financial contributions. It is suggested that such schemes are secured and costed at the earliest possible time, to provide accurate financial obligations for applicants that meet the relevant CIL tests, otherwise this could lead to delays in developments coming forward.

8. CONCLUSIONS

- 8.1 This representation has demonstrated that Phase 2 of Clifton House Farm is an available, suitable and deliverable site to the west of Warton which will round off the settlement and has the opportunity to provide significant infrastructure benefits to the wider settlement through the provision of a link road.
- 8.2 The partial review seeks to take forward a minimum housing requirement in Fylde based on the current standard method figure of 275 dpa which is a significant reduction from the adopted figure of 415 dpa, which is retained as an upper range requirement, thus generating a total requirement of between 6,895 and 8,715 dwellings across the plan period, which they suggest can be met through existing commitments and allocations.
- 8.3 The current standard method generates a similar reduction in the requirement in Wyre compared to the adopted position (down from 460 dpa to 308 dpa), and Fylde therefore argue that there is no longer any unmet need in Wyre (or the wider HMA), which was the basis of the partial review, and therefore no need to make any additional allocations or provision for this.
- 8.4 However, the government have recognised issues with the current methodology and are currently consulting on a revised method to boost housing delivery across the country, with the current calculation generating a need of **488 dpa in Fylde**, an increase of **77%** from the current standard method figure and 18% from the adopted plan figure. It also generates a total need figure of **1,174 dpa** across the Fylde Coast which is **68%** higher than the current figure claimed by the Council (697 dpa).
- 8.5 Whilst this has not yet come into force, we suggest that the Council will need to start planning for this level of need as it is likely to come in soon and unlikely to change significantly.
- 8.6 This will require significant additional housing allocations across Fylde both to meet its own needs and potentially those of the wider HMA, as both Wyre and Blackpool have well known supply constraints (comprising environmental and highways constraints in Wyre, and a simple lack of undeveloped land in Blackpool).
- 8.7 Based on the emerging methodology, with an additional buffer to provide choice and flexibility we suggest the total plan requirement to 2032 should be at least **10,550**. Given the Council's latest claimed supply is actually **8,401** (not the 8,819 claimed in paragraph 9.16 of the plan), this will require additional allocations for at least **2,150** dwellings.
- 8.8 This figure will need to be increased further to meet unmet needs from the wider HMA, and if the plan period is extended as recommended, to cover 15 years from adoption (i.e. from 2032 to 2036/2037 depending on timetable).
- 8.9 We recommend changes to policies DLF1 and H1 and supporting text in chapters 1, 5 and 9 on this basis; whilst also providing additional comments on the other policies that have been updated.
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- 8.10 In terms of the distribution of the emerging housing requirement and new allocations, it is our view that growth should be focussed on allocations in the existing main settlements and strategic locations for development such as Warton.
- 8.11 Within Warton, Clifton House Farm Phase becomes the next obvious choice for allocation, given it scores well in the sustainability appraisal and the potential link road.
- 8.12 In light of the above, we respectfully request that the Council considers this site for allocation in the emerging Local Plan and ensure the site is objectively assessed in any future evidence base review accordingly.

APPENDIX 1 – HLM FULL LAND OWNERSHIP IN WARTON

Key

Clifton House Farm Ownership

Blackfield End Farm Ownership



0m 20m 40m 60m 80m 100m

Scale 1:2,500 (@A2)

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urbanists

Project Title

Clifton Fields, Warton

e*SCAPE Job No.

013-006

Client

Hallam Land

Drawing Number

013-006-P001

Revision

REV -

Drawing Title

Site Boundaries Plan

Scale

1:2,500 @ A2

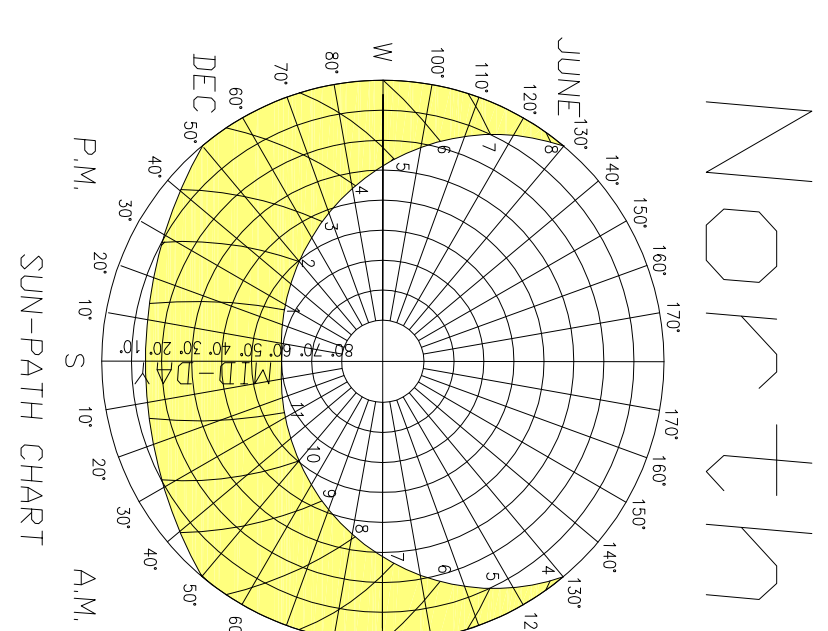
Date

November'14

APPENDIX 2 – CLIFTON HOUSE FARM (PHASE 1) – APPROVED LAYOUT (19/0926)

Church Road - Warton

Proposed Planning Layout - 1:500



Planning Layout Legend

[illegible][illegible]


GRAND TOTAL Line Farmhouse	171	100.00%	171652
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Rev	By	Date
A	BN	20.05.18
B	DM	22.05.18
C		
D		
E	BS	12.09.18
F	BS	17.10.18
G	BS	21.10.18
H	BS	12.09.18
I	BS	12.09.18
J	BS	12.09.18
K	BS	12.09.18
L	BS	12.09.18
M	BS	12.09.18
N	BS	12.09.18
O	BS	12.09.18
P	BS	12.09.18
Q	BS	12.09.18
R	BS	12.09.18
S	BS	12.09.18
T	BS	12.09.18
U	BS	12.09.18
V	BS	12.09.18
W	BS	12.09.18
X	BS	12.09.18
Y	BS	12.09.18
Z	BS	12.09.18

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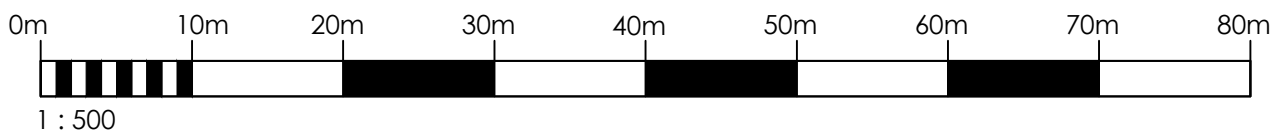
TITLE: Planning Layout

FOR:
Church Road,
Warton

drawn by:	KH	SK275/PL101	drawing no:	
checked by:				
date:	MAY 18			
scale:	1:500@A0		rev:	F

APPENDIX 3 – BLACKFIELD END FARM (SOUTH/WEST) – APPROVED LAYOUT (18/0568)

Lytham Road, Warton



SCHEDULE					
Tenure	Type	Storey	Bed	Parking	Total No
Open market	CAN	2	4	IDG	3
Open market	HRT	2	4	ISG	6
Open market	CHE	2.5	4	DSG	4
Open market	HEN	2	4	ISG	5
Open market	ASC	2	4	ISG	7
Open market	LYM	2	4	ISG	6
Open market	SNO	2.5	3	DPS	12
Open market	LON	2	3	DPS	10
Open market	BRT	2	3	DPS	13
Affordable	MOW	2	3	DPS	8
Affordable	MAX	2	2	DPS	10
Affordable	COX	2	2	DPS	8
Affordable	RIB GF	2	1	SPS	2
Affordable	RIB FF	2	1	SPS	2
Totals					96

Affordable: 31.3% (Required: 30%)
Mix Policy (1-3 Bed) 63 homes (Required 50%)

Gross Site Area (acres) 9.23
Net Site Area (acres) 6.69
Open Space Area: 0.87 Ha (Required: 0.87 Ha)

Parking Legend:
IDG = Integral Double Garage + 2 Spaces; DSG = Detached Single Garage + 2 spaces; ISG = Integral Single Garage + 2 spaces; DPS = Double Parking Space; SPS = Single Parking Space
Dedicated visitor parking spaces provided: 7

- SITE LAYOUT LEGEND**
- Site boundary
 - Existing landscaping retained
 - Existing landscaping removed
 - Indicative tree planting (refer to detailed landscaping design)
 - Affordable Home
 - Open space area (village green, amenity space, ecological zones)
 - Feature hard landscaped area
 - Additional gate windows to this plot (Plots No's. 16, 17, 20, 60 & 66)

- BOUNDARY TREATMENTS LEGEND**
- 1.8m Plot Divisional Fencing
 - 1.8m Screen Wall (refer to materials plan for brick type)
 - 1.2m Metal Railings
 - Gate
 - Hedge boundary (refer to landscaping details)

F Updated to suit LPA comments and latest site and landscaping layout. CTD 2020-02-19
E Amends to suit LPA comments: plot swaps, parking removed, fence line amends, cycle link widened, add'l landscaping etc. Plots 36-53 parking/highway amended, tarmac verges to landscape areas, plot 77/78 parking amended etc. RB 2020-01-08
D Indicative POS design added together with amends to indicative planting to align with detailed landscaping design. CTD 2019-10-29
C M4/312a house type amends including MAX & LON introduction, parking & paving. CTD 2019-10-27
B Path link realigned CTD 2019-10-10
A Finalised for submission. CTD 2019-10-10

Lytham Road
Warton
Proposed Site Layout
Callagher Technical & Design Ltd | enquiries@gt-d.uk

Sept 2019
1:500 @ A1

1324-PL-01

F

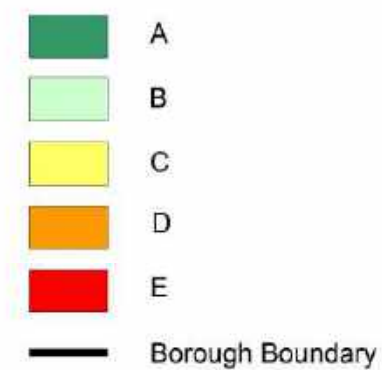
APPENDIX 4 - STRATEGIC SITE ASSESSMENT - DECEMBER 2015

Column1	No. of A	No. of B	No. of C	No. of D	No. of E	Column7	A weighted	B weighted	C weighted	D weighted	E weighted	Overall score	Source	Planning Status
ES5 Blackpool Airport, Squires Gate Lane, Blackpool Airport Corridor	23	4	6	2	2	37	115	16	18	4	2	155	PO	
HSS2 Heyhouses Lane, St Annes	17	6	13	1	0	37	85	24	39	2	0	150	PO	C
HSS7 Highgate Park, Lytham Road, Warton	23	2	5	4	3	37	115	8	15	8	3	149	PO	C
HSS8 The Pastures, Fleetwood Road, Wesham	19	5	8	4	1	37	95	20	24	8	1	148	PO	C
H15 Land North of Weeton Road, Wesham	17	8	7	4	1	37	85	32	21	8	1	147	D	
MUS3 Mill Farm Sports Village, Fleetwood Road, Wesham	18	6	8	3	2	37	90	24	24	6	2	146	PO	C
H14 Land South of Weeton Road, Wesham	16	8	9	2	2	37	80	32	27	4	2	145	D	
H16 Land at and adjacent Pitfield, Fleetwood Road, Wesham	17	6	10	2	2	37	85	24	30	4	2	145	D	
HSS 9 Land North of Blackpool Road, Kirkham (Kirkham Triangle)	15	6	9	6	1	37	75	24	27	12	1	139	PO	C
H17 Land East of Wesham	14	6	11	4	2	37	70	24	33	8	2	137	D	
H8 Land West of Warton	19	2	7	4	5	37	95	8	21	8	5	137	PO	c
H11 Land North East of Warton	17	3	9	3	5	37	85	12	27	6	5	135	D	
MUS2 Whyndyke Farm, Preston New Road, Fylde-Blackpool Periphery	15	6	9	2	5	37	75	24	27	4	5	135	PO	A
H9 Land North of Warton	17	5	5	4	6	37	85	20	15	8	6	134	PO	A
AD15 Land South West of Junction 3 of the M55 - Corner Hall Farm	18	2	5	8	4	37	90	8	15	16	4	133	CFS	
HSS4 Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor	17	3	7	6	4	37	85	12	21	12	4	134	PO	C
H10 Land East of Warton	16	5	5	6	5	37	80	20	15	12	5	132	PO	A
H7 Land North of Dowbridge, Kirkham	14	5	9	6	3	37	70	20	27	12	3	132	PO	
ES6 Land East of DWP Building, Peel Park, Whitehills	18	3	6	2	8	37	90	12	18	4	8	132	CFS	
AD1 Land north and west of Clifton	16	3	8	4	6	37	80	12	24	8	6	130	AD	
HSS5 Cropper Road West, Whitehills	16	3	9	2	7	37	80	12	27	4	7	130	AD	
MUS1 Cropper Road East, Fylde-Blackpool Periphery	15	3	10	3	6	37	75	12	30	6	6	129	PO	C
H2 Land West of North Houses Lane, St Annes	12	6	9	8	2	37	60	24	27	16	2	129	PO	
AD12 Land to West of Clifton Lane, Clifton	14	5	7	5	6	37	70	20	21	10	6	127	CFS	
H6 Land at Peel, Fylde-Blackpool Periphery	16	2	8	3	8	37	80	8	24	6	8	126	D	
HSS1 Land at Queensway, St Annes	11	3	14	8	1	37	55	12	42	16	1	126	PO	C
E3 Land South of Junction 3 of the M55 Greenhalgh	15	2	7	9	4	37	75	8	21	18	4	126	D & extended by CFS	
E1 Land adjacent Poulton-le-Fylde Industrial Estate	15	1	10	5	6	37	75	4	30	10	6	125	D	
AD5 Land at Peel Road Peel, Westby	16	2	6	4	9	37	80	8	18	8	9	123	AD & extended by CFS	
H3 Land North of Moss Hall Lane, Lytham	10	3	14	6	4	37	50	12	42	12	4	120	PO	
AD13 Land east of Peel Road and west of Wild Lane, Westby	14	2	5	7	9	37	70	8	15	14	9	116	CFS	

Weighting				
A	B	C	D	E
5		4	3	2
				1

Overall Banding				
A	B	C	D	E
151+	141-150	131-140	121-130	120 <

OVERALL BANDING



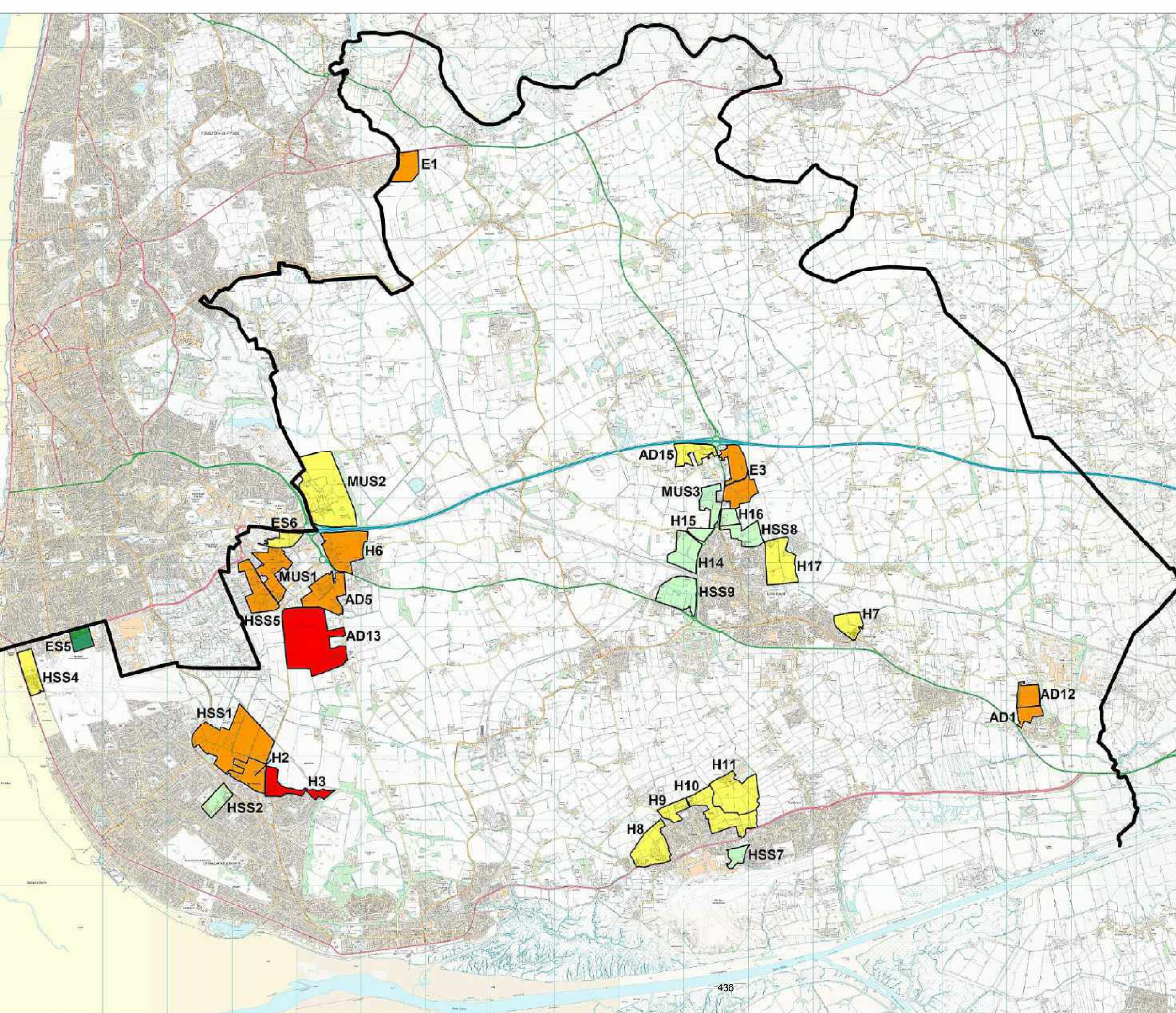
**RPO
STRATEGIC SITE ASSESSMENT
OVERALL BANDING**



FYLDE COUNCIL
Development Services
Town Hall
St Annes
FY8 1LW

Scale
0 600 1200 1800 2400 3000 m

Date : March 2016



- RPO
STRATEGIC SITE ASSESSMENT
SITES TO BE CONSIDERED



FYLDE COUNCIL
Development Services
Town Hall
St Annes
FY8 1LW

Scale
0 600 1200 1800 2400 3000 m

Date : March 2016

APPENDIX 5 – WIDER WARTON MASTERPLAN

e*SCAPE

urbanists

Project Title

Clifton House Farm, Warton

e*SCAPE Job No.

013-006

Client

Hallam Land

Drawing Number

013-006-P017

Revision

REV D

Drawing Title

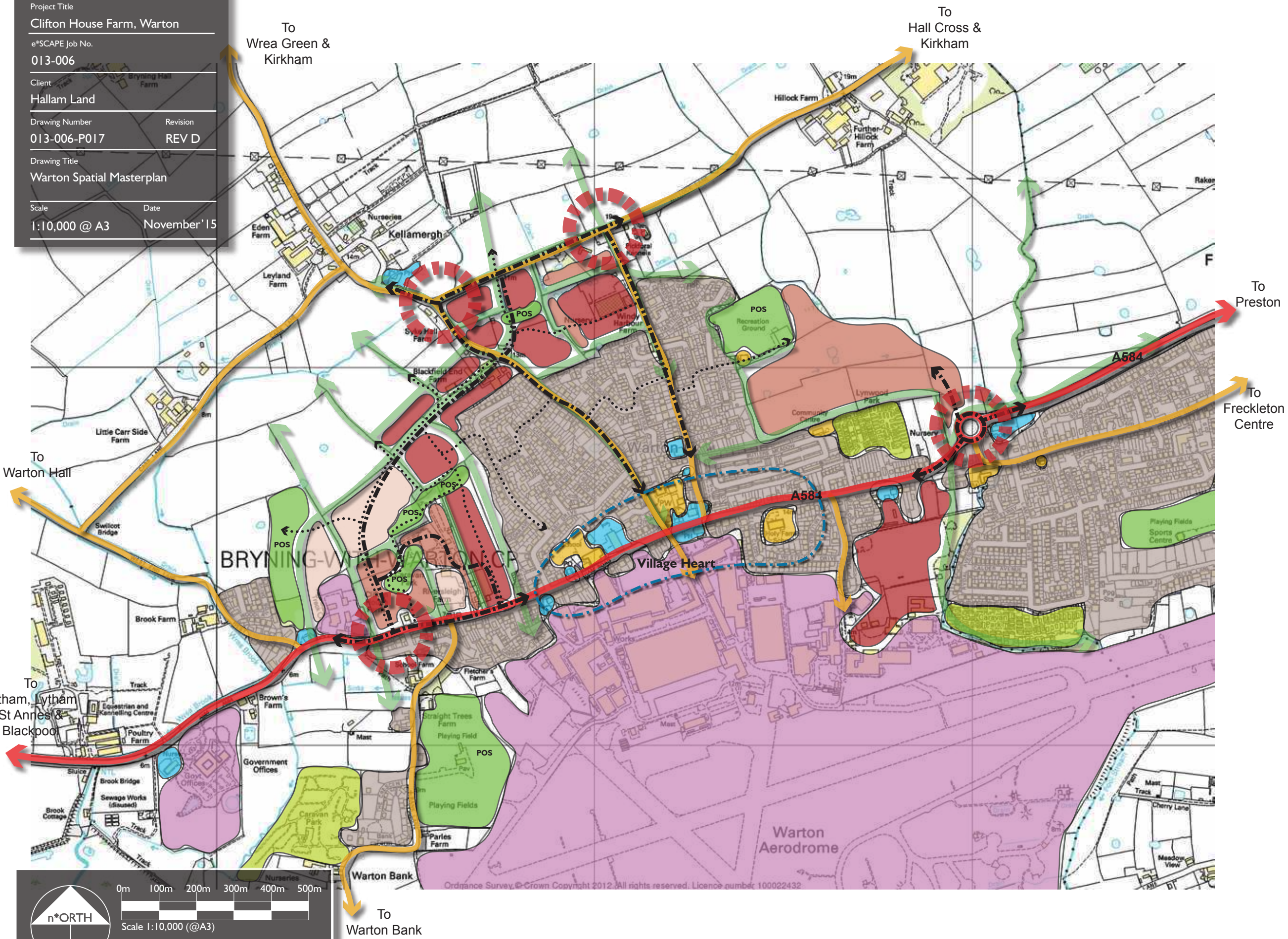
Warton Spatial Masterplan

Scale

1:10,000 @ A3

Date

November'15



Key

Development Parcels

Community Uses

Employment Uses

Retail & Services

Established Residential Areas

Caravan Parks

Recreation & Leisure

Village Heart

Local Distribution Network

Strategic Pedestrian/Cycleway Network

Village Gateways

Green Infrastructure Network

Approved/Committed Development

Currently Proposed Development

Potential Future Development

0m 100m 200m 300m 400m 500m

Scale 1:10,000 (@A3)

Ordinance Survey © Crown copyright 2015. All rights reserved. Licence number LIG1024

Planning Policy
Planning Department
Fylde Council
Town Hall
St Annes Road West
Lytham
FY8 1LW

Our Ref: CB/FLP32
Date: 3 September 2020

Dear Sir/Madam,

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

I refer to the above and consultation in respect of proposed alterations to the Fylde Local Plan which was adopted by the Council on 22 October 2018. Please accept this letter as representations by De Pol Associates in respect of proposed alterations to Policy GD4 Development in the Countryside.

Representations are made on the basis that the proposed alterations do not meet the tests of soundness as set out in paragraph 35 of NPPF. As outlined in these representations it is considered that the proposed changes, in respect of Policy GD4 are not positively prepared, have not been justified and are not consistent with national policy.

These representations relate both to proposed additional wording, inserted by the Council under criterion a) of Policy GD4, together with elements of criterion a) of Policy GD4 that the Council has not proposed to change. These representations detail where it is considered that the policy should be amended in order to meet the tests of soundness.

The following provides a comprehensive response to the Council's proposed alterations to Local Plan Policy GD4.

Positive preparation

It is considered that the proposed change is not positively prepared but, instead takes a negative approach to development. The policy would place greater restriction on development than the current policy does.

It is considered that the Council has incorrectly interpreted paragraph 84 in the context of policy GD4. This is underlined by the Council's selective inclusion of parts of the paragraph and must be read in the context of the leading sentence of GD4 which ultimately seeks to limit development not permit it.



Taken as a whole, with the proposed introduced new wording, the forms of development permissible in the countryside, under criterion a, would have to meet local business or community needs. As proposed the amended policy would not allow for agriculture, horticulture or forestry development which met needs which were not necessarily local.

There are no reasons why non-local requirements may not also be acceptable in the wider setting of the Local Plan and NPPF. The further layer of restriction imposed by this proposed alteration does not serve a positive purpose and only serves to place further unnecessary restrictions on development which are not required.

Justified

The proposed change to the policy is not justified in the context of NPPF paragraph 35. There has been no clear consideration as to whether the alternative of not altering the policy and not inserting additional wording would be consistent with NPPF. The policy, as currently worded is not considered to preclude compliance with the requirements of NPPF paragraph 84. The existing policy provides for development beyond settlement boundaries, to meet local business and community needs without making explicit reference to it.

The alterations proposed by the Council preclude forms of development which are currently permitted by the policy and there is no justification as to why those have been excluded i.e. development which does not respond to local business or community needs. Indeed paragraph 83 of NPPF is clear that policies should enable the growth and expansion of all types of businesses in rural areas.

Further to this it is also considered that the incorporation of the proposed final sentence is also not justified in the setting of the existing policy and wider policies in the plan. Policy INF1 requires development to improve sustainability and accessibility, where appropriate, particularly through criteria e) and f). Equally policies GD7 and ENV1 ensure that development takes account of and respects surroundings whilst GD7 also provides policy in respect of highway safety. It is unclear, in these circumstances, why the final additional sentence is required or justified.

In reviewing Policy GD4, the Council has left a proportion of the policy unchanged but in proposing to amend it the Council will have reviewed the policy in its entirety. In this context it is considered that there is no justification for the retention of the words 'small-scale' in respect of tourist accommodation and 'very exceptionally, larger scale' in relation to tourism development particularly as this approach is not supported in paragraph 83 of NPPF. The retention of these size parameters is not justified to any degree, particularly where there are other policies in the plan, as identified above, which proposals will need to be assessed against. The unchanged wording of the condition would suggest that small scale tourism development (which was not accommodation) would not be acceptable but large scale potentially would be. A reasonable alternative would be for policy GD4 to not refer to scale and this alternative approach would be justified by the controls administered via other policies in the plan and NPPF.



Consistent with National Policy

It is considered that the proposed wording is inconsistent with national policy because of the way it has selectively utilised paragraph 84 of NPPF and, furthermore, the way the policy is now worded lacks clarity as to which elements the *“meeting local business and community needs for the purposes of”* should apply to. The amended wording also fails to serve a purpose, merely duplicating the policies in the NPPF.

Lack of clarity

Paragraph 16 of NPPF sets out a clear requirement that plans should contain unambiguous policies so it is evident how a decision maker should react to proposals. The current proposed wording of policy GD4 fails to achieve this. It is unclear in the proposed policy wording whether the local business and community needs applies to *“other uses appropriate to a rural area...”*. This second part of criterion a) is separated by a semi-colon from the first part suggesting that it does not apply. However, the proposed altered policy is then concluded with a further extract from paragraph 84 which suggests that the requirement for development not to have unacceptable impact on local roads etc is applicable to all parts of the policy. Clearly there is an ambiguity in the policy. In order to clarify the policy, it is proposed that the criterion is split into two and the two parts of the policy separated out. A proposed approach to this is outlined later in this representation.

Lack of purpose

NPPF Paragraph 16 f) requires policies to serve a purpose and avoid duplication, including policies in the NPPF. The insertions proposed in respect of policy GD4 serve no purpose other than to replicate some of the wording that is already included in paragraph 84. As identified earlier in these representations, the existing policy is not contrary to NPPF paragraph 84 and other policies in the plan respond to the other issues relating to character and accessibility. It is not clear what the proposed alteration achieves and as such is contrary to NPPF paragraph 16 in this regard.

Selective approach to NPPF paragraph 84

In respect of the Council’s selective approach to NPPF Paragraph 84, the paragraph identifies that planning policies should recognise that sites to meet rural needs may need to be found beyond existing settlement boundaries. It does not state that development for local business and community needs is the only form of development which should be permitted beyond development boundaries. The response of the Council to this paragraph in NPPF and the proposed alterations to policy GD4 would suggest that this is the case.

Policy GD4, as adopted, is not contrary to the requirements of paragraph 84 and would not pose a barrier to development for local businesses and community needs in the countryside. Rather the changes proposed by the Council adds another layer to this existing policy which would constrain development which would otherwise be acceptable.

General conformity with NPPF

NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, with there being three overarching objectives (economy, social and environmental), which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each objective. Paragraph 9 states that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in the Framework. *Anita Coleman v SoS for CLG* [2013] EWHC 1138



(admin) confirms that for a policy to be consistent with the Framework it must adopt a cost/benefit analysis approach, allowing for a judgment to be made as to whether an adverse impact would be outweighed by the scheme's benefits. It does not support policies which place a blanket ban on particular types of development and preclude the ability to undertake this cost/benefit analysis. The wording of the proposed policy would limit the forms of development which would be acceptable in the Countryside contrary to the requirement for a cost/benefit approach.

Notable in this is the retention of reference to '*small-scale*' and '*exceptionally, large scale*' in the proposed revised policy. These specific references prohibit development not in accordance with these scales from being approved under GD4. For example, a small-scale tourist development, which was not accommodation, would be directly contrary to this policy and would not be permissible under amended policy GD4 regardless of its benefits. If the reference to scale were to be removed this would not preclude the refusal of unacceptable proposals for tourist development in the context of other policies and NPPF. Furthermore NPPF Paragraph 83 identifies that policies should enable "*sustainable rural tourism and leisure developments which respect the character of the countryside*". This does not suggest that scale of any particular leisure or tourism use should be the determinative factor in whether a scheme is acceptable or not. The inclusion of a scale parameters in respect of leisure and tourism developments is clearly inconsistent with paragraph 83 of NPPF in any event.

Addressing Representations

It is considered that proposed Policy GD4 be amended to address the representations made in this submission. It is considered that the following amendment would be sound in the setting of paragraph 34 of NPPF:

Development in the Countryside, shown on the Policies Map including Inset Plans, will be limited to:

- a) that needed for purposes of agriculture, horticulture or forestry;
- b) other uses appropriate to a rural area, including uses which would help to diversify the rural economy, including tourist accommodation, holiday caravan sites and tourism development;
- c) the re-use or rehabilitation of existing permanent and substantial buildings;
- d) extensions to existing dwellings and other buildings in accordance with Policy H7;
- e) development essentially needed for the continuation of an existing enterprise, facility or operation, of a type and scale which would not harm the character of the surrounding countryside;
- f) isolated new homes in the countryside which meet the criteria set out in Policy H6;
- g) minor infill development;
- h) development needed to support entry-level exception sites for first-time buyers (or those looking to rent their own home) on land not already allocated for housing which meets the criteria set out in Policy GD7.

I trust these representations will be given full consideration as part of this consultation period. I would be grateful if I could be updated on progress with the partial review as it progresses.



Yours faithfully,

Chris Betteridge
Associate
De Pol Associates Ltd
E: chris@depol.co.uk



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Date: October 2020

Review Date: N/A

Our Ref: PRFLP32/R22(1)(d)

Authorised by: Julie Glaister, Planning Policy Manager