



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

**Implications of NPPF19 for FLP32**

**March 2020**



## Implications of NPPF19 for FLP32

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>1. Introduction</b>				
1	1	REVISED	Footnote states that this document replaces the first NPPF12 and includes minor clarifications to the NPPF18.	No change needed to FLP32.
2	2	MINOR CHANGE	NPPF must be taken into account when preparing the development plan and is a material consideration in planning decisions.	No change needed to FLP32.
3		NEW	Clarifies that the NPPF should be read as a whole (including footnotes and annexes).	No change needed to FLP32.
4	4	MINOR CHANGE	States that the NPPF should be read in conjunction with national policy on traveller sites and waste.	No change needed to FLP32
5	3	MINOR CHANGE	Makes clear that the NPPF does not address NSIPs.	No change needed to FLP32.
6		NEW	Makes clear that Written Ministerial Statements and endorsed recommendations of the National Infrastructure Commission may be material when preparing plans.	This is a significant change however, the FLP32 does not conflict with this and written material statements or recommendations of the National Infrastructure Commission that have been produced since it was adopted. No change needed to FLP32.

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<b>2. Achieving sustainable development</b>				
7	6	MINOR CHANGE	Makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development.	The FLP32 was examined in relation to the NPPF12 which states at paragraph 6 that that the purpose of the planning system is to contribute to the achievement of sustainable development. The FLP32 was subject to sustainability appraisal (SA) in accordance with the SEA regulations. The Partial Review will also be subject to SA. No change needed to FLP32.
8	07-Aug	REVISED	Sets out the three over arching, interdependant objectives of sustainable development: a) economic b) social c) environmental	In NPPF12 these were referred to as roles rather than objectives; the change in wording reinforces their importance. These were copied into FLP32 paragraph 1.5, as was the introductory sentence, so this requires revision.
9	10	REVISED	Makes clear that sustainable solutions should take account of local circumstances.	This paragraph is a summary of the previous 8, 9 and 10 in NPPF 12. FLP32 was examined in relation to NPPF12 so no change needed.
10	Jan-00	REVISED	At the heart of the NPPF there is a presumption in favour of sustainable development.	This was also stated in the NPPF12, FLP32 met this requirement so no change is needed to FLP32.

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<b>The presumption in favour of sustainable development</b>				
11	14	REVISED	Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, and needs that cannot be met in neighbouring areas unless the application of the policies listed in the Framework provide a strong reason for restricting development. This list of policies is now a closed list (revised footnote 6). Revised footnote to this paragraph (footnote 7) adds the requirement to meet 75% under the Housing Delivery Test or the presumption in favour of sustainable development for decision-taking will be triggered.	The FLP32 provides for the full objectively assessed needs of the Fylde area. The FLP32 ensures that there is enough deliverable land suitable for housebuilding capable of providing a continuous 5 year supply calculated using the "Liverpool Method" from the start of each annual monitoring period. The adoption of Wyre Council's Local Plan triggers a review of the FLP32 to examine unmet need in Wyre (para 1.27 FLP32). Therefore, the presumption in favour of sustainable development for plan-making in NPPF19 has been met so no change is needed. The policies of the Local Plan remain up-to-date for decision-taking in accordance with part d) as the revised footnote 7 triggers are not invoked: the Council has a five-year housing land supply, including appropriate buffer, measured in line with the NPPF19, and the Housing Delivery Test indicates that housing delivery was above 75% of the requirement. Footnote 7 refers to the Housing Delivery Test: this is embedded in performance monitoring indicator 1 in FLP32 Appendix 8 but this indicator refers to 65% rather than 75% as the trigger for the presumption: this requires altering to be consistent with NPPF19.
12	12	REVISED	Makes clear that presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making.	Repeats legislation, no change needed to the FLP32
13	16	REVISED	States that neighbourhood plans should support the delivery of strategic policies in Local Plans.	Summarises previous paragraph 16 NPPF12 no change needed to FLP32
14		NEW	Applies to decision taking as opposed to plan making and sets out where the presumption (11d) applies in relation to Neighbourhood Plans.	Paragraph 11(d) doesn't apply to decision making in Fylde, because there is an up to date Local Plan and policies remain up-to-date (see notes on paragraph 11 above). No change to FLP32 is needed.

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<b>3. Plan-making</b>				
15	15/150/152	MINOR CHANGE	Paragraph 15 is a positive statement about plan making that contains nothing new.	No change to FLP32 is needed.
16	151/155	MINOR CHANGE	Paragraph 16 a)-f) summarise plan making requirements.	FLP32 meets all of these requirements therefore no change to FLP32 is needed.
<b>The plan-making framework</b>				
17		NEW	Reintroduces the potential for regional / sub-regional planning for strategic policies.	No change to FLP32 is needed.
18	185	REVISED	Clarifies that that non-strategic policies can be in either a Local Plan <u>or</u> a Neighbourhood Plan.	No change to FLP32 is needed.
19	153	REVISED	Makes clear that the Development Plan for an area comprises the combination of strategic and non-strategic policies which are in force at a particular time.	Defines the Development Plan. No change to FLP32 is needed.

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<b>Strategic policies</b>				
20	156	REVISED	Makes clear that strategic policies should address the pattern, scale and quality of development and details the four areas policies should cover.	The FLP32 covers everything mentioned apart from Minerals which is a County matter. Paragraph 1.18 of the plan includes text quoted from NPPF12 paragraph 156; this needs amending to reflect NPPF19 paragraph 20.
21		NEW	Plans should make explicit which are strategic policies, where a single Local Plan is prepared the non-strategic policies should be clearly distinguished from the strategic policies	A list of policies to be inserted at the beginning of the FLP32 which describes whether each policy is strategic or non strategic.
22	157	MINOR CHANGE	Strategic policies should look ahead over a minimum 15 year period from adoption, except in relation to town centre development.	The wording is more stringent than NPPF12 Paragraph 157, however, the FLP32 does look ahead for 15 years therefore it has met this requirement and no change is needed.
23	157	MINOR CHANGE	Strategic policies should provide a clear strategy for bringing forward sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development.	The FLP32 allocated sufficient sites to meet the OAN for housing and employment: there were no broad locations for development. The delivery strategy accords with Paragraph 23 of NPPF19, therefore no change to FLP32 is needed.
<b>Maintaining effective cooperation</b>				
24	178 180	REVISED	Places a "Duty to Cooperate" on LPAs, county councils and other prescribed bodies in respect of strategic cross boundary issues.	The FLP32 Paragraphs 1.12-1.27 set out in detail how Fylde Council has met the 'Duty to Cooperate'. The FLP32 was found sound with regard to this the first test of soundness. Some quotes are included in paragraphs 1.15 and 1.16 of the FLP32 taken from NPPF12, which need revising from paragraphs 24-27 of NPPF19.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
25	179 180	REVISED	Recommends collaborative working between strategic policy makers and recommends whom they should engage with.	The FLP32 Paragraphs 1.12-1.27 set out in detail how Fylde Council has met the 'Duty to Cooperate'. The FLP32 was found sound with regard to this the first test of soundness. Some quotes are included in paragraphs 1.15 and 1.16 of the FLP32 taken from NPPF12, which need revising from paragraphs 24-27 of NPPF19.
26	181	REVISED	Where should additional infrastructure be provided and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.	The FLP32 Paragraphs 1.12-1.27 set out in detail how Fylde Council has met the 'Duty to Cooperate'. The FLP32 was found sound with regard to this the first test of soundness. Some quotes are included in paragraphs 1.15 and 1.16 of the FLP32 taken from NPPF12, which need revising from paragraphs 24-27 of NPPF19
27	181	REVISED	Requires the preparation of statements of common ground, documenting how cross boundary issues are to be addressed.	Need to prepare and maintain one or more SoCG. This not a change to the FLP32 but a separate document that will be produced as the partial review is progressed. Some reference should be added to the FLP32 to make reference to the SoCG and the outcomes identified within it.
<b>Non-strategic Policies</b>				
28		NEW	States what should be addressed in non-strategic policies.	The non-strategic policies of the FLP32 will be labelled as such as part of the Partial Review and they cover the matters set out in paragraph 28 NPPF19 so no change is needed.
29	183 184	REVISED	Clarifies that neighbourhood plans should not promote less development than set out in the strategic policies for the area.	This relates to Neighbourhood Plans. FLP32 paragraph 1.9 quotes from NPPF12 paragraph 183 and this requires amending to quote from NPPF19 paragraph 29.
30	185	REVISED	Policies in an 'adopted' Neighbourhood Plan can take precedence over non-strategic policies in a Local Plan.	This is an instruction to the decision maker and does not need repeating in the FLP32.

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Preparing and reviewing plans				
31	158	REVISED	Preparation and review of all policies should be underpinned by relevant and up-to-date evidence, which is adequate and proportionate and takes into account relevant market signals. No significant change from content of NPPF12	The FLP32 is underpinned by an extensive and up-to-date evidence base. The SHMA and Addenda took account relevant market signals. Some new evidence is needed to support the partial review, this will comprise a Housing Need Survey and a review of the Viability Appraisal. A Sustainability Appraisal and Habitats Regulation Assessment will also be carried out and consulted on at the Publication stage.
32	152	REVISED	Sustainability appraisal should inform plan preparation.	This requirement was in NPPF12 paragraph 165, the preparation of FLP32 was informed by sustainability appraisal at every stage, no change is needed.
33	153	NEW	Requires that a Local Plan should be reviewed and if necessary updated every five years. Relevant strategic policies will need updating if the local housing need figure has changed significantly; earlier review may be necessary if this changes significantly	This is already a legal requirement (Regulation 10A of the Town and Country Planning (Local Planning)(England)Regulations 2012). It should not be repeated in the FLP32 therefore, no change is needed. This Partial Review commenced under one year after adoption of the Local Plan, therefore is fully in compliance of the requirement of paragraph 33. NPPF19 changes the methodology for calculating housing need, therefore the Partial Review will consider the impact on relevant policies: this is dealt with under paragraph 60.

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<b>Development contributions</b>				
34	173/174	REVISED	This paragraph summarises paragraph 173 of NPPF12	The FLP32 was subject to viability testing and found sound in this respect. No change needed.
<b>Examining plans</b>				
35	182	REVISED	Sets-out the "Tests of Soundness". To be sound a plan must: <ul style="list-style-type: none"> <li>• meet the OAN for the area</li> <li>• meet unmet need from neighbouring areas, where practical (SoCG)</li> <li>• represent an appropriate strategy</li> <li>• be deliverable</li> <li>• be consistent with policies in the NPPF</li> </ul>	The FLP32 meets the full OAN for the plan area. A SOCG must evidence effective joint working on cross boundary strategic matters that have been dealt with rather than deferred. A SOCG will be produced as part of the Partial Review. Tests of soundness have changed slightly: those from NPPF12 paragraph 182 are quoted in FLP32 in paragraph 1.28, therefore this needs revising from NPPF19 paragraph 35.
36	182	MINOR CHANGE	Tests of soundness will be applied to non-strategic policies	This has already happened during the Examination in Public of the FLP32 which was found sound.
37		NEW	Requires neighbourhood plans to meet the 'basic conditions' and other legal requirements before they can proceed to referendum.	No change needed to FLP32.
<b>4. Decision-making</b>				
38	186/187	REVISED	A very positive statement about how decisions should be taken by Local Planning Authorities.	No change needed to FLP32.

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<b>Pre-application engagement and front loading</b>				
39	188	MINOR CHANGE	Makes clear that pre-application discussion between LPAs and developers is encouraged.	No change needed to FLP32.
40	189	NO CHANGE	Repeats that developers are encouraged to carry out pre-application consultation with the local community.	No change needed to FLP32
41	190	MINOR CHANGE	Statutory consultees should be pro-active from an early stage and respond in a timely manner throughout the development process.	No change needed to FLP32
42	191	NO CHANGE	Repeats that early engagement with other consenting bodies and the parallel processing of other consents is encouraged.	No change needed to FLP32
43	192	NO CHANGE	Repeats that applicants are expected to contact the LPA and any other expert bodies to discuss the content of any assessments that may be required.	No change needed to FLP32
44	193	MINOR CHANGE	Clarifies that supporting information should be relevant, necessary and material to the application. These requirements should be kept to the minimum to make decisions, and should be reviewed at least every two years.	No change needed to FLP32
45	194	REVISED	Makes clear that LPAs should consult the appropriate bodies for applications concerning or in the vicinity of hazardous sites, pipelines etc.	No change needed to FLP32
46	195	REVISED	LPAs are encouraged to use voluntary planning performance agreements to help speed up the application process.	No change needed to FLP32

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<b>Determining applications</b>				
47	196	REVISED	Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer time period has been agreed with the applicant in writing.	For the decision maker, no change needed to the FLP32.
48	216	MINOR CHANGE	Addresses the weight to be given to policies in emerging plans.	Wording used is very similar to NPPF12 and is in any case for decision making and should not be included in the FLP32.
49	197	REVISED	Prematurity is unlikely to be a reason for refusal of planning permission, other than when both the development is so substantial it would undermine the plan making process and the emerging plan is advanced but not part of the development plan.	Wording provides greater clarity but again is for the decision maker and no change is needed to FLP32.
50		NEW	Clarifies that refusal of planning permission on grounds of prematurity will seldom be justified.	Wording provides clarity but again is for the decision maker and no change is needed to FLP32.
<b>Tailoring planning controls to local circumstances</b>				
51	199	REVISED	LPAs are encouraged to use Local Development orders (LDOs) where appropriate.	No change needed to FLP32.
52	201 202	REVISED	LPAs should work collaboratively with local communities with regard to Neighbourhood Development Orders and Community Right to Build Orders.	No change needed to FLP32.
53	200	NO CHANGE	The use of Article 4 directions and planning conditions in relation to permitted development rights.	No change needed to FLP32.

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<b>Planning conditions and obligations</b>				
54	203	NO CHANGE	Planning conditions and obligations	No change needed to FLP32.
55	206	REVISED	More detailed information about planning conditions	No change needed to FLP32.
56	204	REVISED	Wording has been changed 'Planning Obligations must only be sought' where they meet all of the following tests. Footnote added which clarifies that the tests are set out in Regulation122(2) of the Community Infrastructure Levy Regulations 2010.	FLP32 does not conflict with the change of wording from should to must, it does repeat the tests which haven't changed therefore no change is needed to the FLP32.
57	205	NEW	Most of the additional text clarifies the role of viability in decision taking. All viability assessments, including any undertaken at the plan- making stage, should reflect the recommended approach in national planning guidance, including standardised inputs, and should be made publicly available.	Viability Assessments of the the FLP32 were undertaken, they were examined as part of the Examination in Public and they were made publicly available, therefore no change is needed to the FLP32. As Planning Practice Guidance relating to viability has also been updated, the Viability Assessments should be reviewed to ensure that they remain in accordance with the updated approach, and to reflect any alterations made to parts of the FLP32 as a result of this Partial Review.
<b>Enforcement</b>				
58	207	MINOR CHANGE	Provides clarity about enforcement	No change needed to FLP32.

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<b>5. Delivering a sufficient supply of homes</b>				
59	47	REVISED	The wording of this paragraph has been expanded to include the importance of sufficient amount and variety of land coming forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with planning permission is developed without delay.	The FLP32 provides for the full objectively assessed needs of the Fylde area. The FLP32 ensures that there is enough deliverable land suitable for housebuilding capable of providing a continuous 5 year supply calculated using the "Liverpool Method" from the start of each annual monitoring period, delivery is being monitored and is in line with the targets. No change needed to FLP32.
60		NEW	To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in planning practice guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.  In establishing this figure any needs that cannot be met within neighbouring areas should also be taken into account.	The FLP32 will be revised to include a minimum number of homes needed calculated using the standard methodology as prescribed in NPPF19 paragraph 60 and set out in planning practice guidance. Wyre Council is also carrying out a review of its Local Plan and this is required to include a reassessment of housing need, which will also be lowered by using the standard methodology. The issue of how Wyre's needs will be met within Wyre's area will be addressed through the review of the Wyre Local Plan. This is also a matter which will be further addressed through the SOCG.
61	50	REVISED	Size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The list of groups to be included has been amended to include affordable housing, students, travellers and people who rent their homes.	The SHMA and addenda do assess the amount of affordable housing needed (paragraph 9.65 FLP) and 30% affordable housing is required on sites of 10 dwellings or more. The SHMA also assessed the amount and types of rented stock that was needed. Any type of housing can be rented and there is a vast range of housing within Fylde that can fulfil that need, including the 6,895-8,715 new homes that will be provided in the plan period. Students are not a significant issue in Fylde as there are few higher education establishments. Policy H5 provides for the needs of Gypsies and Travellers meeting the definition in Annex 1 of Planning Policy for Traveller Sites. No change is needed to the FLP32 other than an update to the definition of affordable housing in the Glossary.
62	50 (3)	REVISED	This paragraph summarises paragraph 50(3) of NPPF12 but there is no new content.	No change needed to FLP32.

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63		NEW	Establishes that LPAs can only apply affordable housing policies to small sites - "5 units or fewer" - in designated rural areas. To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced equivalent to the existing gross floorspace of the existing buildings.	Advice formerly in Written Ministerial Statement (November 2014). This requirement does not need to be included in the FLP32. No change to the FLP32 is needed. The text relating to vacant buildings has been included in an Affordable Housing SPD which will be adopted in 2020.
64		NEW	At least 10% of homes on major development to be available for "affordable home ownership", four exceptions to this 10% requirement are provided.	The FLP32 requires all market schemes of 10 or more homes to provide 30% affordable housing. This is in excess of the 10% specified by this new requirement, and the mix of tenures within the 30% requirement will be subject to discussion with the Council, which in turn will be informed by the new requirement for 10% affordable home ownership. Therefore no change is required to FLP32.
65		NEW	Requires an indicative housing figure to be provided for designated neighbourhood areas via strategic policies.  These figures should not need re-testing at the Examination of the Neighbourhood Plan.	Two neighbourhood plans have been made, the St Annes Neighbourhood Plan and the Bryning with Warton Neighbourhood Plan. Neither of these Neighbourhood Plans include a housing number for the neighbourhood area. However, the FLP32 does include housing numbers for Lytham St Annes Strategic location and the Warton Strategic location. In addition Neighbourhood Areas have been designated for Staining, Singleton, Elswick and Ribby-with-Wrea: in each case the FLP32 provides an indicative requirement of 100 / 150 in the case of Staining and Ribby-with-Wrea and 50 in the case of Singleton and Elswick. No change to the FLP32 is needed.
66		NEW	Where it is not possible to provide a requirement figure for a neighbourhood area, if requested, the Local Planning Authority should provide an indicative figure.	The only Neighbourhood Plan which is being progressed during the Partial Review is the Wrea Green NP. The indicative number of homes needed is 100 / 150 as a Tier 1 Larger Rural Settlement, in accordance with FLP32 Policies S1, DLF1, SL5 and FLP32 paragraph 6.21. This has already been exceeded by the sites which are allocated under FLP32 Policy SL5 and are shown on the Policies Map at Wrea Green. No change to the FLP32 is needed.

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<b>Identifying land for homes</b>				
67	47	REVISED	This paragraph summarises the bullets in the previous paragraph 47 NPPF12. (Some elements of the previous paragraph 47 are moved to a separate paragraph 73, i.e. regarding 5-year supply)	The FLP32 has allocated a wide variety of sites in order to meet the need for new homes identified until 2032. No change to the FLP32 is needed as this requirement has been met.
68	47	NEW	Small and medium sized sites should be identified through the development plan and brownfield registers, to accommodate at least 10% of the requirement on sites less than one hectare. Tools such as Local Development Orders should be used to bring sites forward, windfall sites within settlement boundaries should be supported and LPAs should work with developers to sub divide large sites where this could speed up delivery of homes.	The Local Plan provides for 10.1% of homes required on allocated sites under 1ha, and therefore meets the requirement. The development of windfall sites is supported through the inclusion of a windfall allowance. The council is working with developers to encourage the sub-division of large sites where this could speed the delivery of homes e.g. Queensway and Whyndyke. No change required to FLP32.
69		NEW	Reflects the change to "small and medium sized sites" in the requirement for Neighbourhood Plans to consider opportunities to allocate this size of site.	This is advice to neighbourhood planning groups, no change is needed to the FLP32.
70	48	REVISED	This is a more detailed version of the previous paragraph 48, however, it does not contain any new requirements.	No change needed to FLP32, Policy H2 only allows for garden land development subject to stringent caveats relating to design, character, access, amenity and other matters. No change is needed to FLP32.
71		NEW	New policy to allow the development of exception sites to provide entry-level housing for first-time buyers (and renters) on land not already allocated for housing. They should comprise of entry level homes that offer one or more types of affordable housing (Annex 2 of Framework). Also be adjacent to existing settlements, proportionate in size to them not compromise the protection given to assets of importance in the Framework, and comply with any local design policies and standards.	This will be added to Policy GD4 as an additional category of development in the Countryside area, adapted from the text from NPPF19 paragraph 71, including cross-referral to FLP32 Policy GD7 (design).

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72	52	REVISED	New paragraph which has been substantially expanded and includes 5 new bullets a) to e).	The FLP32 does contain several large allocations e.g. Whydyke and Queensway. All of the points in the bullets have been addressed apart from bullet e). However, given the distances between these large sites and other settlements and also the risk of flooding adjacent to Lytham St Annes it is not considered appropriate or necessary to establish Green Belt around or adjoining any of the new developments in the FLP32. No change to the FLP32 is needed.
<b>Maintaining supply and delivery</b>				
73	47 (4) and (2)	NEW	Sets out the requirement to produce an annual five year supply statement and the buffer which should be included.	The FLP32 includes a trajectory which illustrates the expected rate of housing delivery over the plan period. The Council updates its 5 year land supply annually and has submitted an Annual Position Statement. No change to the FLP32 is needed.
74		NEW	Clarifies that a five year supply can be demonstrated in a recently adopted plan, or in a subsequent annual position statement.	No change needed to FLP32
75		NEW	Introduces the Housing Delivery Test, which is set out in a separate document.	The HDT is embedded in performance monitoring indicator 1 in FLP32 Appendix 8 but it is applied to the residual housing requirement of 479 rather than the figure used by the published HDT which is the lower of the annual housing requirement in the plan (415) or the local housing need figure. Appendix 8 will need to be altered in line with the revision to the housing requirement to a residual figure of 351-479.
76		NEW	Recommends the use of planning conditions to help expedite development, should also assess why an earlier grant of planning permission did not start.	No change needed to the FLP32

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Rural housing				
77	54	MINOR CHANGE	Minor change to previous paragraph 54 NPPF12 on rural exception sites.	No change needed to the FLP32
78	55	MINOR CHANGE	Text altered to say Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.	The FLP32 allocates land at rural villages in order that they should grow and thrive. No change needed to the FLP32
79	55	REVISED	Paragraph 79 contains the additional bullet about the subdivision of an existing residential dwelling.	Need to change FLP32 Policy H6 to reflect this because H6 replicates NPPF12 with additional detail provided about how we will identify the criteria are met e.g. rural workers' dwellings. NPPF19 adds criterion d) development that involved the subdivision of a dwelling as an allowable exception to the general restriction on isolated homes in the countryside. Therefore this will need adding as an additional criterion to Policy H6.

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<b>6. Building a strong, competitive economy</b>				
80	18 19	REVISED	Paragraph 80 summarises paragraph 18 & 19.	No change to FLP32 needed.
81	21	REVISED	Planning policies should meet the requirements of a) to d) which are very similar to the earlier set of bullets.	FLP32 paragraph 7.21 quotes from paragraph 21 of NPPF12. The text needs altering to accord with paragraph 81d) of NPPF19. FLP32 paragraph 11.1 quotes from one of the bullets in NPPF12 paragraph 21; need to remove "recognise and" from the text to accord with NPPF19 paragraph 81c)
82	21	REVISED	Need to plan for the locational requirements of different business sectors e.g. knowledge parks, distribution parks etc. The content of this paragraph is taken from the bullets in paragraph 21	The FLP32 makes provision for the expansion of advanced engineering and manufacturing through the provision of the Enterprise Zone at Warton, a second Enterprise Zone is being delivered at Blackpool Airport close to the end of the M55. It has the potential to provide for the locational requirements of different businesses. No change to FLP32 needed.
83	28	REVISED	Bullets supporting a prosperous rural economy have been summarised.	No change to content of FLP32 needed. FLP32 Appendix 1 states that NPPF12 paragraph 28 replaced FBLP policies TREC15 and TREC16; these are now replaced by paragraph 83 NPPF19; need to update FLP32 Appendix 1.
84		NEW	New policy addressing the potential need to accommodate sites for local business and community needs outside existing settlements in rural areas, provided it does not have an unacceptable impact on local roads and exploits any opportunities to make the development more sustainable.	Need to modify Policy GD4 criterion a) to reflect text from paragraph 84 of NPPF19. There is also a need to modify paragraph 7.14 to reflect the text from paragraph 84 of NPPF19.

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<b>7. Ensuring the vitality of town centres</b>				
85	23	REVISED	A shorter list of criteria labelled a) to f)	Policy EC5 Vibrant Town, District and Local Centres complies with paragraph 85. No change needed to FLP32.
86	24	MINOR CHANGE	Strengthens the sequential test for main town centre uses. It now reads "main town centre uses should be located in town centres, then edge-of-centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out-of-centre sites be considered".	Policy EC5 states that development outside town centres will be considered in line with the Framework, therefore the strengthening of the sequential test is covered by the FLP32. No change to the content of FLP32 is needed. FLP32 Appendix 1 states that NPPF12 paragraph 24, 25, 26, 27 replaced FBLP policies SH13 and SH14; this is now replaced by paragraphs 86-90 NPPF19; need to update FLP32 Appendix 1
87	24	MINOR CHANGE	Very similar to the text in the previous NPPF12.	No change needed to FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 24, 25, 26, 27 replaced FBLP policies SH13 and SH14; this is now replaced by paragraphs 86-90 NPPF19; need to update FLP32 Appendix 1
88	25	NO CHANGE	Same text as NPPF12.	No change needed to FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 24, 25, 26, 27 replaced FBLP policies SH13 and SH14; this is now replaced by paragraphs 86-90 NPPF19. Also FLP32 Appendix 1 states that NPPF12 paragraph 25 replaced FBLP policy SH15; this is now replaced by paragraph 88 NPPF19. Need to update FLP32 Appendix 1

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
89	26	REVISED	<p>Removes the need to assess the impact of out of centre <u>office</u> proposals on town centres. The sequential approach is considered to adequately control inappropriate office proposals.</p> <p>Impact assessment required for out-of-centre developments over 2,500m<sup>2</sup> or a locally set threshold.</p>	<p>FLP32 Policy EC5 states that proposals for retail, leisure and office development in 'edge of centre' or 'out -of -centre' locations will be considered in line with the Framework. However, the word 'office' does need to be deleted from FLP32 Policy EC5 and paragraph 8.55. The FLP32 has a locally set threshold of 750 sq m. FLP32 Appendix 1 states that NPPF12 paragraphs 26 and 27 replaced FBLP policy TREC5; this is now replaced by paragraphs 89 and 90 NPPF19; need to update FLP32 Appendix 1. Also FLP32 Appendix 1 states that NPPF12 paragraph 24, 25, 26, 27 replaced FBLP policies SH13 and SH14; this is now replaced by paragraphs 86-90 NPPF19; need to update FLP32 Appendix 1</p>
90	27	MINOR CHANGE	Factors replaced by considerations	<p>No change needed to content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraphs 26 and 27 replaced FBLP policy TREC5; this is now replaced by paragraphs 89 and 90 NPPF19; need to update FLP32 Appendix 1. Also FLP32 Appendix 1 states that NPPF12 paragraph 24, 25, 26, 27 replaced FBLP policies SH13 and SH14; this is now replaced by paragraphs 86-90 NPPF19; need to update FLP32 Appendix 1</p>
<b>8. Promoting healthy and safe communities</b>				
91	69	REVISED	<p>Extensive re-drafting of this paragraph, the main change being the addition of the last criteria about enabling and supporting healthy lifestyles.</p>	<p>Policy HW1 Health and Well Being addresses the issues raised and in September 2019 the Council adopted a Healthy Living SPD which covers access to healthy food, allotments and layouts that encourage walking and cycling. No change needed to the FLP32.</p>

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
92	70	REVISED	The main change is the inclusion of criterion b)take into account and support the delivery of local strategies to improve health, social and cultural well being for all sections of the community.	The FLP32 contains extensive sections on the provision of health care services and the Lancashire Health and Well Being Board, as well as describing the remit of the Healthy New Town at Whyndyke Garden Village. A Healthy Living SPD was adopted by the Council, it provides more detailed guidance on these matters. Therefore, no change is needed to the FLP32.
93		NEW	Planning policies and decisions should consider the benefits of estate regeneration which should be to a high standard.	The FLP32 doesn't mention estate regeneration however any decisions would consider the benefits in line with the Framework: therefore this does not need to be repeated in the FLP32.
94	72	REVISED	Similar to the previous text apart from the text about giving greater weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.	The Council worked very closely with LCC (the education authority) during the production of the plan to ensure that where needed sites for new schools will be provided within development sites. No change needed to FLP32.
95	164	NEW	New paragraph 95 does contain more detailed policy than the previous paragraph 164.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 164 replaced FBLP policy EMP5; this is now replaced by paragraph 95 NPPF19; need to update FLP32 Appendix 1
<b>Open space and recreation</b>				
96	73	MINOR CHANGE	Minor changes have been made to the content of paragraph 74.	The FLP32 was based on an up-to-date Open Space Study. No change needed to FLP32.
97	74	MINOR CHANGE	Minor changes have been made to the content of paragraph 74.	Policy ENV3 refers to paragraph 74, this reference needs changing to paragraph 97.

<b>2019 Paragraph</b>	<b>2012 Paragraph</b>	<b>Change 2012-19</b>	<b>Purpose of paragraph and summary of any relevant change</b>	<b>Council's Response</b>
<b>98</b>	<b>75</b>	MINOR CHANGE	Minor change from NPPF 12	No change needed to the FLP32
<b>99</b>	<b>76</b>	MINOR CHANGE	Minor changes have been made to the content of paragraph 76.	No change needed to the FLP32.
<b>100</b>	<b>77</b>	MINOR CHANGE	The phrase "Local Green Space designation will not normally be appropriate for most green areas or open space" has been removed. Apart from that the text is very similar.	No change needed to the FLP32
<b>101</b>	<b>78</b>	MINOR CHANGE	Deletion of the word local at the beginning of the paragraph.	No change needed to the FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>9. Promoting sustainable transport</b>				
102		NEW	New paragraph which outlines what transport issues should be addressed.	The FLP32 covers all of the issues raised in the bullets a) to e). Relevant policies are Policy T4 Enhancing sustainable transport choice and Policy GD7 Achieving Good Design in Development. No change needed to FLP32.
103	30 34 35	REVISED	Significant development should be focused on locations which are or can be made sustainable. This will help reduce congestion and emissions and improve air quality and public health.	The spatial development strategy of the FLP32 does focus development at the four strategic locations for development. No change needed to the FLP32.
104	31 33 37 41	REVISED	Sub-paragraph a) repeats 37 (NPPF12) b) new, c) replaces 41(NPPF12) d) new e) new f) replaces 33 (NPPF12). Sub-paragraph f) now includes additional text to allow airports "to adapt and change over time".	The FLP32 was prepared with the active involvement of the Local Highways Authority LCC and other transport infrastructure providers so that strategies and investments are aligned. Policy T4 deals with Enhancing Transport Choice. The Council is not aware of any large scale transport facilities that need to be located in the area. The Council does recognise the importance of maintaining a network of general aviation airfields and Policies T2 and T3 are intended to secure the future of both the airfields in Fylde. No change needed to FLP32.
105	39	MINOR CHANGE	Sub-paragraph e) requires policy to "ensure adequate provision of spaces for charging plug-in and ultra-low emission vehicles".	The FLP32 does not mention spaces for charging vehicles. However, the Council will be producing an SPD on parking which will address this issue. Paragraph 11.59 of the FLP32 quotes directly paragraph 39 of NPPF12; this needs revising to amend the final bullet to incorporate paragraph 105e).
106		NEW	Places restrictions on the use of maximum car parking standards.	Policy T5 Parking Standards provides general guidance on parking and does not conflict with Paragraph 106. Paragraph 11.59 of the FLP32 includes some text which is very similar to this but is not entirely in accordance: needs replacing with the text directly from NPPF19 paragraph 106.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
107		NEW	Addresses the need for adequate lorry parking in new developments.	The FLP32 does not cover lorry parking however, this is not considered to be a significant issue in Fylde. No change to the FLP32 needed.
<b>Considering development proposals</b>				
108	32	REVISED	Point c) now references highway safety	All of the sites in the FLP32 have safe and suitable access. The Highway Authority was consulted in relation to all of the proposed allocations. Highway safety is a matter for Lancashire County Council, the Highway Authority. These requirements have been met. No change to the FLP32 needed.
109	32 (3)	REVISED	Highway safety has been inserted, if there is an unacceptable impact development can be prevented or refused.	Lancashire County Council are the Highway Authority they were consulted on the FLP32 and are consulted on all planning applications. Policy GD7 addresses highway safety. No change needed to FLP32.
110	35	REVISED	Similar to paragraph 35 (NPPF12) except for the addition of d) and access by service and emergency vehicles;	No change to the FLP32 needed.
111	32 36	REVISED	Highlights the need for Travel Plans	Policy T4 requires travel plans for developments that generate significant amounts of movement.
<b>10. Supporting high quality communications</b>				
112	42	REVISED	Paragraph 112 expands on the content of previous paragraph 42.	Policy INF1 supports the delivery of high speed fibre broadband. No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
113	43	MINOR CHANGE	The term "telecommunications" has been changed to "electronic communications" throughout this section.	Telecommunications to be changed to electronic communications throughout this section. FLP32 Appendix 1 states that NPPF12 paragraph 43 replaced FBLP policy CF8; this is now replaced by paragraph 113 NPPF19; need to update FLP32 Appendix 1.
114	44	MINOR CHANGE	The term "telecommunications" has been changed to "electronic communications" throughout this section.	Telecommunications to be changed to electronic communications throughout this section. FLP32 Appendix 1 states that NPPF12 paragraph 43 replaced FBLP policy CF8; this is now replaced by paragraph 113 NPPF19; need to update FLP32 Appendix 1.
115	45	MINOR CHANGE	The term "telecommunications" has been changed to "electronic communications" throughout this section.	Telecommunications to be changed to electronic communications throughout this section. FLP32 Appendix 1 states that NPPF12 paragraph 43 replaced FBLP policy CF8; this is now replaced by paragraph 113 NPPF19; need to update FLP32 Appendix 1.
116	46	MINOR CHANGE	Very minor changes, this text is directed at the decision maker	Telecommunications to be changed to electronic communications throughout this section. FLP32 Appendix 1 states that NPPF12 paragraph 43 replaced FBLP policy CF8; this is now replaced by paragraph 113 NPPF19; need to update FLP32 Appendix 1.

## 11. Making Effective Use of Land

117	111	MINOR CHANGE	Promote effective use of land in meeting development needs and make "as much use as possible" of previously developed land.	Policy H2 requires a minimum residential density of 30 dwellings per hectare. Previously developed land (pdl) within Fylde settlements is usually redeveloped promptly as property prices are very high. There are not large areas of PDL in Fylde as it has never had large industrial areas. Fylde Council does have a brownfield register. No change needed to the FLP32.
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2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
118		NEW	Five criteria which provide policy on making effective use of land.	Policy GD6 does promote mixed use development, the FLP32 does protect land for many different functions eg wildlife and recreation, the FLP32 also makes a windfall allowance which allows brownfield sites to come forward and Policy H3 allows for conversions and change of use to residential. The FLP32 does not mention the use of airspace above premises however this is not considered necessary as it is supported by the Framework. No change needed to the FLP32.
119		NEW	Addresses Brownfield Registers and proactive identification of potential development sites by LPAs.	The Council has a Brownfield Register. No change is needed to the FLP32.
120	22	REVISED	Requirement to reallocate land where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated.	The Council has commenced monitoring of the FLP32 in line with the Performance Monitoring Framework. The FLP32 is delivering housing and employment development on the allocated sites. Paragraph 8.17 of the FLP32 quotes from section of NPPF12 paragraph 22 and has been amended to refer to changes in the demand for land. Out of date text to be deleted and new text inserted which refers to the need to reflect changes in the demand for land. Also FLP32 paragraph 9.58 quotes directly from NPPF12 paragraph 22 but then goes on to state why protection of employment sites is justified by evidence. This text is updated to include a more general reference in line with the change made to FLP32 paragraph 8.17.
121		NEW	Promotes the use of non-allocated retail and employment sites for housing and other uses.	The FLP32 does not conflict with this new paragraph. Property prices are high and this provides an incentive to deliver these types of sites. No change needed to the FLP32. Paragraph 9.57 of the FLP32 is a quote from NPPF12 paragraph 51; this is now gone; requires redraft from NPPF19 paragraph 121 which covers similar area.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Achieving appropriate densities</b>				
122		NEW	Support for development that makes efficient use of land and takes account of the five stated criteria relating to the identified need for housing, viability, availability of infrastructure, maintaining the character of an area and the importance of securing well-designed, attractive and healthy places.	The FLP32 takes account of all of these criteria. No change needed to the FLP32.
123	-	NEW	<p>Make "optimal use of the potential of each site" to deliver new homes.</p> <p>a) Requires the use of minimum density standards to avoid building homes at low densities in cities and town centres, and pursuing higher-density housing in accessible locations, whilst reflecting the character and infrastructure capacity of the area.</p> <p>b)The use of minimum density standards should be considered for other parts of the plan area.</p> <p>c) Includes the caveat that any development where there is a relaxation of "policy and guidance relating to daylight and sunlight" should still provide acceptable living standards.</p>	Policy H2 requires a minimum residential density of 30 dwellings per hectare throughout Fylde. The FLP32 complies with the requirements of new paragraph 123. No change needed to FLP32.
<b>12. Achieving Well -Designed Places</b>				
124	56	NEW	Emphasises that good design is a key aspect of sustainable development, as is effective engagement with communities.	No change needed to FLP32.
125	57 58	REVISED	Requires Local Plan policies to set out a "clear design vision and expectations" supported by visual tools including design guides and codes.	The FLP32 contains a section on achieving good design in development. It establishes design principles and sets out good practice in relation design and access statements. No change to FLP32 needed.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
126	59	REVISED	Encourages use of SPDs, design guides and codes.  The paragraph 59 requirement, to avoid unnecessary prescription or detail on design, has been removed.	The FLP32 does provide design principles and does provide good practice in relation to Design and Access statements. The Council is progressing a Good Design SPD. No change needed to the FLP32.
127	58	REVISED	The six bullets have been redrafted into 6 criteria. In sub-paragraph f) a reference to promoting "health and well being" has been added.	Policy GD7 Achieving Good Design in Development does cover all of the criteria included in paragraph 27. The only omission appears to be the words 'and which promote health and well being' in criterion f. These words should be added to criterion I of Policy GD7.
128	66	NEW	Emphasises the need to look favourably on applications that have sought pre-app advice and engaged with the community.	This is advice to the decision maker and is something that will be included in a Good Design SPD which the Council are progressing.
129	62	REVISED	This is advice to LPAs on tools and processes for assessing and improving the design of development.	The FLP32 does include tools and advice for assessing and Policy GD7 which is intended to achieve Good Design in Development.
130	64	REVISED	Addresses the refusal of applications on design grounds making links to SPDs, design guides etc.  A new sentence requires that "LPAs should seek to ensure that the quality of approved development is not materially diminished between permission and completion".	The FLP32 should not repeat the content of the NPPF. However, a new bullet should be added to GD7 to reinforce this new stance against the lowering of standards as a development is delivered.
131	63	MINOR CHANGE	Minor changes to the wording of paragraph 63 NPPF12.	No change needed to FLP32.
132	67	MINOR CHANGE	Minor changes to the wording of paragraph 67 NPPF12.	No change needed to FLP32.

### 13. Protecting Green Belt land

133	79	NO CHANGE	No change from NPPF12	No change needed to FLP32.
134	80	NO CHANGE	No change from NPPF12	No change needed to FLP32.
135	82	MINOR CHANGE	Minor changes to paragraph 82 NPPF12	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
136	83	REVISED	<p>The exceptional circumstances for boundary changes must be fully evidenced and justified through the preparation or updating of plans.</p> <p>Any changes must first be identified in a strategic policy, but detailed amendments can be made in Local Plans <u>and</u> Neighbourhood Plans</p>	The FLP32 complies with paragraph 136 of NPPF19 because Policy GD2 states that within Green Belt national policy will apply. No change needed to FLP32.
137		NEW	<p>Before concluding that "exceptional circumstances" exist LPAs should have fully examined "all other reasonable options" for meeting [their] identified need for development".</p> <p>The three sub-paragraphs set out three exceptional circumstances. Sub-paragraph b) now includes a cross-reference to ensure that development is in line with Chapter 11 - Making effective use of land</p>	The FLP32 complies with paragraph 136 of NPPF19 because Policy GD2 states that within Green Belt national policy will apply. No change needed to FLP32.
138	84	REVISED	States that removing land from the Green Belt can be offset by "compensatory improvements to the environmental quality and accessibility of remaining Green Belt land".	The FLP32 proposed one very small change to the Green Belt Boundary which was dealt with through the Examination in Public. No change needed to FLP32.
139	85	MINOR CHANGE	Minor changes to previous paragraph 55	No change needed to the FLP32.
140	86	MINOR CHANGE	The word "prevent" has been replaced by "restrict"	No change needed to the FLP32.
141	81	MINOR CHANGE	Minor changes to text.	No change needed to FLP32.
142	92	MINOR CHANGE	Minor changes to text.	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Proposals affecting the Green Belt</b>				
143	87	MINOR CHANGE	Minor change to text.	No change needed to FLP32.
144	88	MINOR CHANGE	Minor change to text.	No change needed to FLP32.
145	89	REVISED	Some additions have been made to the list of development that is not to be considered as inappropriate: b) now includes burial grounds and allotments f) allows for "limited affordable housing" g) allows redevelopment of pdl in the Green Belt as long as it does not have a greater impact on the openness of the Green Belt.	Policy GD2 states that within Green Belt national policy will be applied. No change needed to the FLP32.
146	90	REVISED	Additions include criterion e) Outdoor sport and recreation, cemeteries and burial grounds Criterion f) Development brought forward under a Community Right to Build Order or Neighbourhood Development Order.	Policy GD2 states that within Green Belt national policy will be applied. No change needed to the FLP32.
147	91	NO CHANGE	No change from NPPF12	Policy GD2 states that within Green Belt national policy will be applied. No change needed to the FLP32.
<b>14. Meeting the challenge of climate change, flooding and coastal change</b>				
148	93	REVISED	Reinforces the importance of the planning system in supporting the transition to a low carbon future.	Chapter 12 of the FLP32 Water Management, Flood Risk and Climate Change is aligned with paragraph 148 NPPF19. No change needed to the FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Planning and climate change</b>				
149	94	REVISED	Paragraph 149 expands paragraph 94. New text about future resilience and making provision for the possible relocation of vulnerable development and infrastructure	The FLP32 does take a proactive approach to climate change. This wording could be included in a future review of the FLP32, although the FLP32 should not be repeating the NPPF. No change to the FLP32 is needed.
150	99 95 96	REVISED	Text from previous paragraphs 99 and 95.	The FLP32 did not allocate any land in areas at risk of flooding. The strategic development strategy of the FLP32 focusses 90% of development in the Strategic Locations for Development which are not at risk of flooding, and are also well served by public transport. No change to the FLP32 needed.
151	97	REVISED	A summary of the previous paragraph 97. The extensive footnote for sub-paragraph b) has been deleted.	Policy CL3 Renewable and Low Carbon Energy Generation complies with paragraph 151. No change needed to the FLP32.
152	97	REVISED	Addition of neighbourhood planning as a source of community initiatives.	Policy CL3 Renewable and Low Carbon Energy Generation states that community benefits of proposals should be taken into account. No change needed to FLP32.
153	96	MINOR CHANGE	Very minor change.	No change needed to the FLP32.
154	98	MINOR CHANGE	Minor changes to the previous text.  Footnote 49 now includes an exception for the repowering of existing turbines.	Sub paragraph a) is included in Policy CL3 of the FLP32. No change needed to the FLP32.
<b>Planning and flood risk</b>				
155	100	REVISED	Revised to include the words (whether existing or future).	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
156	100	REVISED	Plans should have regard to the cumulative impacts of flood risk, rather than just looking at the flood risk impact of individual development sites.	The Council worked very closely with the Environment Agency during the production of the plan. The cumulative impacts of the allocations were considered by EA. No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
157	100	REVISED	Addition to c) of where appropriate through the use of natural flood defences.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
158	101	MINOR CHANGE	Minor changes to previous paragraph 101	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
159	102	REVISED	Expansion of paragraph 102 into two paragraphs (159 & 160) to emphasise the need for SFRA's and the application of the Exception Test.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
160	102	REVISED	Expansion of paragraph 102 into two paragraphs (159 & 160) to emphasise the need for SFRA's and the application of the Exception Test.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
161	102	NO CHANGE	No change.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
162	104	MINOR CHANGE	Revised to make clear that more recent information about existing or potential flood risk should be taken into account.	No change needed to the content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
163	103	REVISED	Previous paragraph 103 has been expanded to reinforce the importance of five issues that should be addressed if development is permitted in areas at risk of flooding.	Policy CL1 states that planning decisions should follow the sequential, risk based approach to the location of development, as required by the Framework. No change required to content of FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
164	104	MINOR CHANGE	Slight rephrasing of the previous paragraph.	No change needed to the FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 100 replaced FBLP policy EP30; this is now replaced by paragraphs 155-165 NPPF19; need to update FLP32 Appendix 1.
165		NEW	Requirement for major developments to include SuDS	Policy CL1 states all new development is required to minimise flood risk impacts, the use of SUDs is supported. No change needed to the FLP32.

## Coastal change

166	105	NO CHANGE	No change	No change needed to the FLP32.
167	106	MINOR CHANGE	Minor changes to text.	There are Coastal Change Management Areas in Fylde Policy ENV1, no change needed to the FLP32.
168	107	MINOR CHANGE	Slight rephrasing of introductory sentence.	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
169	108	MINOR CHANGE	Minor changes to text of Paragraph 18.	No change needed to the FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>15. Conserving and enhancing the natural environment</b>				
<b>170</b>	<b>109 112 113</b>	REVISED	<p>Criterion a) sites of biodiversity ... value has been added.</p> <p>Criteria b) and c) are new. Although most of b) comes from the Core Planning Principles in Paragraph 17 of NPPF12.</p> <p>Criterion e) second sentence is new.</p>	<p>Policy ENV2 protects sites of biodiversity value. The FLP32 complies with the additional text in b) and c) and e). ENV1 protects the undeveloped coast. The Council has produced a draft Biodiversity SPD which was adopted in September 2019. No specific policy relates to bullet e) but it is not necessary to repeat the NPPF. Paragraph 13.6 of the FLP32 needs the reference to NPPF12 paragraph 109 removing in respect of valued landscapes, but the content remains in accordance with NPPF19. Paragraph 13.29 contained two out of date references to NPPF12 which need deleting and the reference to net gain needs updating to reflect the content of the NPPF19.</p>
<b>171</b>	<b>117</b>	REVISED	<p>The need distinguish between the hierarchy of international, national, and locally designated sites" has been added.</p>	<p>Policy ENV2 of the FLP32 includes the hierarchy of sites. The FLP32 and Policy ENV2 complies with this paragraph, no change needed to FLP32. FLP32 paragraph 13.36 includes some quoted content that was formerly in NPPF12 paragraph 114, but is now altered in paragraph 171 of NPPF19 therefore paragraph 13.36 needs updating.</p>
<b>172</b>	<b>115 116</b>	REVISED	<p>Advice on assessments needed if development is proposed in National Parks, the Broads and or AONBs.</p>	<p>Fylde does not contain any National Parks or AONBs. No change needed to FLP32.</p>
<b>173</b>	<b>114</b>	MINOR CHANGE	<p>Raises the importance of heritage coast.</p>	<p>No Heritage Coast in Fylde, no change needed to FLP32.</p>

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Habitats and biodiversity</b>				
174	117	REVISED	In addition to identifying and components of local wildlife-rich habitats and wider ecological networks the need to "safeguard" them has been added. Also under b) and pursue opportunities for securing measurable net gains for biodiversity.	Policy ENV2 of the FLP32 does safeguard local wildlife rich habitats and wider ecological networks. Net gain was covered in criterion iv), however it needs redrafting to reflect NPPF19. Paragraph 13.29 refers to net gains but needs rewording to reflect updated content in paragraph 174. Paragraph 7.12 needs rewording to reflect the content of paragraph 174 of NPPF19.
175	118	REVISED	The specific reasons for restricting development now includes "ancient woodland and aged or veteran trees" in criterion c)	Policy ENV2 b) criterion 1 does protect ancient woodland and ancient or veteran trees. Criterion iv) does aim to provide an overall improvement in biodiversity value, however text should be amended to reflect the content of NPPF19. Paragraph 13.29 refers to net gains but needs rewording to reflect updated content in paragraph 175.
176	118	MINOR CHANGE	Gives protection to proposed SPAs, SACs, Ramsars and sites proposed as compensation for adverse effects on the above, was former last bullet of 118.	No change needed to the FLP32.
177	119	MINOR CHANGE	Clarifies when the presumption in favour of sustainable development applies. Very similar to previous 119.	No change needed to the FLP32.
<b>Ground conditions and pollution</b>				
178	121	MINOR CHANGE	Minor changes to previous Paragraph 121	No change needed to the FLP32.
179	120	NO CHANGE	Last sentence of previous paragraph 120	No change needed to the FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
180	123/125	MINOR CHANGE	Summarises the content of paragraphs 123 and 125.	Paragraph 13.17 of FLP32 notes identification and protection of areas of tranquillity and quotes paragraph number 123; instead needs to call them "tranquil areas" in accordance with NPPF19 paragraph 180, and remove paragraph number. FLP32 Appendix 1 states that NPPF12 paragraph 123 replaced FBLP policy EP27; this is now replaced by paragraphs 180 and 182 NPPF19. Also in FLP32 Appendix 1 it states that NPPF12 paragraph 125 replaced FBLP policy EP28; this is now replaced by paragraph 180 NPPF19. Need to update FLP32 Appendix 1.
181	124	REVISED	Expands on the content of previous Paragraph 124	No change needed to the FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 124 replaced FBLP policy EP26; this is now replaced by paragraph 181 NPPF19; need to update FLP32 Appendix 1.
182	124	NEW	Addresses the integration of new development with existing uses.  Makes clear that the 'agent of change (the applicant) is responsible for any mitigation required.	This is covered by GD7 Achieving Good Design in Development criterion t. No change needed to FLP32. FLP32 Appendix 1 states that NPPF12 paragraph 123 replaced FBLP policy EP27; this is now replaced by paragraphs 180 and 182 NPPF19; need to update FLP32 Appendix 1.
183	122	MINOR CHANGE	Minor change to previous Paragraph 122.	No change needed to FLP32.

## 15. Conserving and enhancing the historic environment

184		NEW	Effectively a new introduction with text from previous Paragraph 132 referencing World Heritage Sites.	No change needed to FLP32.
185	126	MINOR CHANGE	Minor change to introductory paragraph.	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
186	127	NO CHANGE	No change.	No change needed to FLP32.
187	-	NEW	LPAs are expected to maintain or have access to a historic environment record, it should be up to date and should be used to assess the significance of heritage assets and predict the likelihood that assets will be discovered in the future.	No change needed to FLP32.
188	141	MINOR CHANGE	Start of former paragraph 141 has been made a separate paragraph.	No change needed to FLP32.

### Proposals affecting heritage assets

189	128	REVISED	Expanded version of previous paragraph which requires developers to submit an appropriate desk based assessment and where necessary a field evaluation.	Paragraph 13.54 of the FLP32 requires development proposals to be accompanied by a Heritage Statement in accordance with national policy. No change needed to FLP32.
190	129	MINOR CHANGE	Minor change	No change needed to FLP32.
191	130	NO CHANGE	No change	No change needed to FLP32.
192	131	MINOR CHANGE	Minor Change	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
Considering potential impacts				
193	132	REVISED	New sentence that clarifies that when considering the impact of development great weight should be given to the asset's conservation (the more important the asset, the greater the weight), irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm	Paragraph 13.52 of the FLP32 should be amended to clarify that decisions will be taken in line with the Framework (no paragraph number) in order to address this change.
194	132	MINOR CHANGE	Breaks down previous paragraph 132 but does not add any new text.	No change needed to FLP32.
195	133	MINOR CHANGE	Criteria are given letters a-d	Paragraph 13.52 of the FLP32 makes reference to the requirements of paragraph 133 of NPPF12; these are now set out in paragraph 195 of NPPF19. NPPF19 provides more detail at paragraph 195, this doesn't need repeating in FLP32, a clearer reference to the Framework will be provided.
196	134	REVISED	Only change is the insertion of the words, where appropriate.	No change needed to FLP32.
197	135	NO CHANGE	No change	No change needed to FLP32
198	136	MINOR CHANGE	Insertion of the word 'the'.	No change needed to FLP32.
199	141	MINOR CHANGE	The requirement for LPAs to make information about the historic environment publicly accessible becomes paragraph 199.	Text is very similar to that of previous paragraph 141, no change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
200	137	MINOR CHANGE	Very minor change.	No change needed to FLP32.
201	138	MINOR CHANGE	Minor changes.	No change needed to FLP32.
202	140	NO CHANGE	No change	No change needed to FLP32.

## 17. Facilitating the sustainable use of minerals

203	142	MINOR CHANGE	Summary of previous paragraph 42	No change needed to FLP32.
204	143	REVISED	Criteria in this policy are now listed a-h rather than bulleted with minor changes to the text.	FLP32 contains a section on Minerals and Waste Development, however, LCC is the Minerals and Waste Planning Authority, no change needed to FLP32.
205	144	REVISED	First bullet of 144 incorporated into introduction. 7th original bullet becomes paragraph 206. Bullets labelled with letters a) to g).	No change needed to FLP32.
206	144	MINOR CHANGE	Previous 7th bullet from paragraph 144.	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Maintaining supply</b>				
207	145	MINOR CHANGE	Criteria labelled a-h	No change needed to FLP32.
208	146	REVISED	Criteria labelled a-f.	No change needed to FLP32.
<b>Oil, gas and coal exploration and extraction</b>				
209	147	REVISED	New criterion a) recognise the benefits of on-shore oil and gas development, including unconventional hydrocarbons, for the security of energy supplies and supporting the transition to a low-carbon economy; and put in place policies to facilitate their exploration and extraction.	No change needed to FLP32.
210	148	NO CHANGE	No change	No change needed to FLP32.
211	149	MINOR CHANGE	Sub-paragraphs pulled-out of text for emphasis	No change needed to FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Annex 1: Implementation</b>				
212	212 213	REVISED	Summarises content of previous paragraphs	The FLP32 is subject to a Partial Review, described as a partial revision in paragraph 212. Changes will be made to the FLP32 as part of the Partial Review.
213	211 215	REVISED	Advice about the weight to be given to policies according to their degree of consistency with the Framework.	This is advice to the decision maker. No change needed to the FLP32.
214		NEW	Transitional arrangements.	No change needed to FLP32.
215		NEW	Describes the Housing Delivery Test.	This does not need to be included in the FLP32.
216		NEW	Supplementary information regarding paragraph 14	This does not need to be included in the FLP32.
217		NEW	The Government will continue to explore with individual areas the potential for planning freedoms and flexibilities, for example where this would facilitate an increase in the amount of housing that can be delivered.	This text does not need to be included in the FLP32.

2019 Paragraph	2012 Paragraph	Change 2012-19	Purpose of paragraph and summary of any relevant change	Council's Response
<b>Annex 2: Glossary</b>				
Annex 2		REVISED	New definition of affordable housing.	New definitions of affordable housing to be included in FLP32.
Annex 2		REVISED	New definition of deliverable.	The FLP32 does not define deliverable, no need to repeat NPPF as likely to become out of date.
Annex 2		NEW	Definition of Designated Rural Areas.	The FLP32 does have a definition of designated areas eg SSSIs. It should be amended to say Designated Rural Areas, which will not include the heritage designations previously included under designated areas.
Annex 2		NEW	Housing Delivery Test	No reference is made to the Housing Delivery Test in the FLP32. The test operates independently of the FLP32 through the text in NPPF19 and the PPG. There are no implications for the policies of the FLP32 that lead to a need for including reference to the Housing Delivery Test within the text. No change needed to FLP32.
Annex 2		NEW	Permission in principle.	This does not need to be included in the FLP32. No change needed to FLP32.





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