

Plan for Fylde - Plan for the Future

Fylde Borough Council
**The Statement of Regulation 18
Consultation (Regulation 22(1)(c)
(i-iv) document)**

December 2016



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1. Introduction

- 1.1 This Statement of Consultation is produced to accompany the Fylde Local Plan Publication Version, at the stage of its submission to the Secretary of State for Examination in Public. The document has been prepared in accordance with Regulation 22(1)(c)(i), (ii), (iii) and (iv) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 As required by Regulation 22, the document sets out (i) which bodies and persons were invited to make representations under regulation 18, (ii) how those bodies and persons were invited to make such representations, (iii) a summary of the main issues raised by those representations, and (iv) how those main issues have been addressed in the Local Plan Publication Version.
- 1.3 1.3 A separate document provides the information required by Regulation 22(1)(c)(v) and (vi) in relation to the Regulation 20 consultation.

The Fylde Local Plan

- 1.4 Future development within Fylde will be guided by the plans and policies within the new Local Plan for Fylde, which runs from 1 April 2011 to 31 March 2032. The Fylde Local Plan to 2032 includes Strategic and Non-Strategic Allocations for new homes and employment land, sites for Gypsies, Travellers and Travelling Showpeople, leisure, retail, tourism and community use, or a mixture of such uses. The Plan also comprises Development Management policies, which will inform decisions on planning applications and appeals; together with policies to protect the natural and built environment and heritage assets.
- 1.5 Preparation of the Fylde Local Plan commenced in 2011. The stages of plan preparation are described in the following sections. Preparation of the plan began with a Vision, Issues and Objectives consultation and Regulation 25 consultation in 2011, followed by a more formal Issues and Options consultation in 2012. A Preferred Option document was consulted on in 2013. A Revised Preferred Option consultation followed in 2015, which forms the basis of the Publication Version which accompanies this statement.
- 1.6 For each stage in the preparation of the plan, the following sections give a brief description of the document, a description of how the consultation was undertaken, and how the responses were taken account of in the next stage of the plan. The consultation materials and responses reports are attached as appendices.

2. Vision, Issues and Objectives 2011

- 2.1 The 'Issues, Vision and Objectives' consultation undertaken between 7 February and 25 March 2011 was the first consultation on what was at that time intended to be the Fylde Core Strategy. The Core Strategy was intended to be the key strategic document to guide planning matters in Fylde. It would contain a vision, objectives and a delivery strategy, as follows:
- The overall **vision**, informed by an analysis of the key issues, to set out how the borough and the places within it should develop.
 - The strategic **objectives** to expand the vision into the key specific issues which need to be addressed.
 - The **delivery strategy** to set out how the objectives will be achieved, including how much development is intended to happen where, when, and by what means it will be delivered.
- 2.2 At the LDF Steering Group meeting on 1st March 2010, members of the steering group were invited to consider the issues and to bring any further issues that could be justified to the next meeting on 21st April 2010. At this subsequent meeting, amendments to the issues were made and agreed by the steering group. These are the issues that were used as part of the consultation.
- 2.3 Consultation on the 'issues, vision and objectives' is not prescribed in the planning legislation. It was an informal dialogue with communities and stakeholders, and reflects the government's emerging localism agenda. The purpose of the consultation was:
- To seek views on the main planning policy issues facing the Borough over the next 20 years.
 - To seek views on what the future vision of Fylde should include and look like.
 - To seek views on the objectives to address the issues identified.
- 2.4 Many comments were received during the consultation. These were summarised and were used to update the 'Plan for Fylde' document, which set out the issues, vision and objectives for the Core Strategy.
- 2.5 The issues were updated to take account of the comments received during the consultation. Evidence was gathered to verify new issues that arose. As the Core Strategy had to be supported by robust evidence, issues that could not be supported were removed.

Methods of consultation

- 2.6 The consultation was undertaken using a variety of methods in order to contact a wide range of people, with a particular emphasis on the 'silent majority', as set out below.

2.7 Individuals and stakeholders on the Register of consultees

All individuals and stakeholders on the Planning Policy Register of Consultees were contacted by letter (the Register of Consultees is a database of over 1,100 individuals and stakeholders who the Planning Policy team regular consults on LDF matters). Farms and static caravan sites were added to the register before the consultation commenced, and these were included in the consultation.

- 2.8 **General public** were targeted through the following:
- Drop-in events to engage the general community were held at nine venues across the borough. Area specific leaflets were available at each venue.
 - The community engagement vehicle visited nine locations across the borough. Again, area specific leaflets were available at the vehicle.
 - Posters to advertise the drop-in events were sent to the parish councils and the consultation venues. Posters were also put up in the reception of the Town Hall and Public Offices.
- 2.9 **Young people** were engaged through:
- A meeting was held with six young people of the Fylde Youth Council.
 - The following schools accepted our offer of visiting the classes indicated below:
 - St. Peter's RC Primary School, Lytham (Year 6 class)
 - Ansdell Primary School (Year 6 class)
 - St. Bedes RC High School, Lytham (Yr 8 and 9 Geography classes)
 - Pear Tree Specialist School (four students who were verbal communicators and lived in Fylde).
- 2.10 **Employers and employees** had their views sought through:
- Drop-in events were held at four major employers: AXA insurance, Springfield Fuels, Land Registry and Aegon.
- 2.11 **Commuters and visitors** to Fylde at Preston Bus Station were engaged-with.
- 2.12 **Media** were used to raise awareness of the consultation:
- An article and press notice were placed in the Lytham St. Annes Express.
 - Leaflets were inserted into the Lytham St. Annes Express.
 - The Assistant Director: Planning Services was interviewed on BBC Radio Lancashire.
 - The consultation was advertised and comments were made through the Council's Twitter, Facebook and Community Forum pages.
 - There was a feature on the main page of the Council's website.
- 2.13 The **less affluent** were targeted by the following:
- Benefit claimants at the One Stop Shop were interviewed.
 - New Fylde Housing were informed through the tenant's forum.
 - People applying for a bond guarantee scheme at the YMCA were interviewed, and a volunteer at the YMCA was interviewed in relation to homeless people and people in dire need.

- 2.14 Other miscellaneous publicity included
- An exhibition was set up at the Fylde Showcase Event at Lytham Hall, enabling contact to be made with various groups and members of the public.
 - An email with electronic leaflet was distributed to all LSP contacts inviting them to make comments.
 - Parish councillors were briefed by planning officers at a parish liaison meeting.
 - Consultation material was deposited at all the borough's libraries.
- 2.15 The interview proformas were used as a basis for interviewing people for much of the methods listed above. The proforma concentrated on the issues and vision, in order to make the proforma more accessible to the general public. Appendix 1 of this report includes the interview proforma.
- 2.16 A more detailed comments form was made available on the Council's website. This contained specific questions about the issues, vision and objectives. This form was made available at most of the engagement events that took place. Appendix 1 of this report includes the questionnaire.

Responses to the consultation

- 2.17 Over 300 interview proformas were completed, over 100 pieces of work was produced by the students at the schools and 48 representations were received by letter and email.
- 2.18 Many of the letters and emails received were substantial in content. Also, information was considered from the additional sources listed below:
- Parish plans
 - Findings from the Sustainable Community Strategy Resident Focus Group
 - Results of the Fylde Residents' Autumn Survey
 - St. Annes Town Plan Business, Household and Student Surveys.

This additional information was considered in order to take advantage of work done by other groups and partnerships which can be used to inform the development of the Core Strategy.

- 2.19 The detailed report on responses is set out in Appendix 2.

Further Development of the Vision for Fylde

- 2.20 A number of respondents to the consultation on the 'Issues, Vision and Objectives' noted that, although they agreed with the key content of the draft vision, they considered the vision to be overly detailed and they would prefer a shorter overarching 'borough-wide' vision, as long as the key elements relating to different places were retained.
- 2.21 After consideration of the following points it was decided to present a more succinct version of the draft vision for agreement by the LDF Steering Group. This succinct version, as set out in Appendix 2, was included in the next 'Issues and Options' stage of consultation on the Core Strategy. Key conclusions were:

- The Vision needed to be succinct in order to produce a more focussed user friendly Core Strategy.
- The Core Strategy Vision should relate to the Vision for Fylde’s Sustainable Community Strategy, which is shorter and relates to the borough as a whole.
- It needed to present an overarching strategic vision of what the borough would be like in twenty years’ time – specific detail would be incorporated within the body of the chapters of the emerging Core Strategy.

The Spatial Objectives

2.22 A number of comments were received relating to the proposed spatial objectives. The consultation version of the spatial objectives, amended to take account of these comments, is included in Appendix 2. The proposed spatial objectives took account of the objectives included in the Fylde Sustainable Community Strategy and addressed the issues facing Fylde.

Next stage

2.23 Following agreement by the LDF Steering Group, the amended succinct Vision for Fylde and the proposed Spatial Objectives, plus the Issues, was included within the text of the ‘Issues and Options’ document.

The Regulation 25 Consultation

2.24 Following on from the Vision, Issues and Objectives consultation, it was necessary to also carry out a more formal consultation under Regulation 25 of the Town and Country Planning Regulations 2004. This required that when preparing a development plan document, a local authority must notify a list of specific bodies as to the subject of the proposed document. They, along with the general consultation bodies the local authority considers may have an interest, should be invited to make representations on what it should contain. The consultation was undertaken between 19th May and 1st July 2011 seeking views on the proposed content of the emerging Fylde Core Strategy.

2.25 In this consultation, the Council proposed that the Core Strategy should contain various themes including settlement hierarchy, greenbelt, the countryside, housing, employment, retail, heritage, biodiversity, culture, landscape, waste and minerals. The six week public consultation exercise commenced on the 19th May and closed at 5pm on 1st July 2011. The purpose of the consultation was to invite representations on what subjects, topics or themes Fylde Core Strategy ought to contain.

Who was consulted?

2.26 The Register of Consultees is a database kept and updated by the Planning Policy Department. It is used for consultations on all Planning Policy Documents. At the time of the consultation, the database contained over 1100 Consultees.

2.27 All individuals and groups who were already included in the Register of Consultees were consulted, this included:

- All those that we are required to consult by the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009;
- Government departments;
- Elected councillors;
- Town and parish councils;

- Local Strategic Partnership Groups;
- Planning agents; and
- Local residents and businesses who have registered their interest in being involved in planning policy consultation.

Methods of Consultation

2.28 All individuals and groups who were already included in the Register of Consultees were notified about the consultation exercise by way of letter or email. A notice was placed on the Council's consultation webpage to advertise the consultation. An advert was placed in the notice section of the Lytham St Annes Express to advertise the consultation. An email notification was distributed to members of the Local Strategic Partnership and their network's. Written representations could be submitted via email or post, or via completing an online response form via the council website.

Responses Received

- 2.29 The Regulation 25 Consultation generated 48 responses, of which 22 responses were received via email, 19 via post and 7 via online form. The responses have generated 160 representations.
- 2.30 The council produced a consultation report which provides a summary of each representation, the Council's response and where necessary, suggested changes or additions. (See Appendix 2)

Additional subjects, topics and themes to be covered in the Core Strategy following representations received

- 2.31 There was a range of representations received. Some of the consultees made comments in relation to issues that the Council had already listed for inclusion in the Core Strategy, such as housing and the green belt. These would be taken into account as part of the ongoing preparation of the Core Strategy.
- 2.32 In addition, a number of consultees proposed that the Core Strategy should also include sections covering the following themes:
- strategic cross boundary issues, including Fylde's position within the Fylde Coast Sub-Region and as part of the Lancashire Local Enterprise Partnership
 - transport, including public transport, local standards for parking provision, congestion and travel to work implications
 - tourism (including environmental tourism) and the visitor economy
 - flood risk, climate change and coastal and dune management
 - energy efficiency standards within buildings and renewable energy
 - green infrastructure, bridleways and access to recreational green spaces
 - farming and the importance of local food production
 - health and wellbeing and community development, including the role of places of worship
 - achieving good design in the built environment
 - provision of specialist accommodation for the elderly
 - skills and training
 - provision for the needs of gypsies and travellers
 - infrastructure planning, including education

- developer contributions.

2.33 Some of the consultees made comments in relation to issues that the Council had already listed for inclusion in the Core Strategy, such as housing and the green belt. These would be taken into account as part of the ongoing preparation of the Core Strategy.

2.34 The above additional themes, as suggested by consultees, were considered relevant for inclusion in the Core Strategy and were dealt with at the next stage of Core Strategy preparation.

3. Issues and Options 2012

- 3.1 The Issues and Options consultation took place over six weeks between Thursday 7th June and Thursday 19th July 2012, and was the third consultation on the Local Plan. The consultation took place in accord with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.2 This part of the consultation statement provides an overview of the consultation, setting out the consultation material that was used, who and how the Council consulted, how comments received were considered and an evaluation of the consultation. Part 2 (included in Appendix 4) provides a summary of the comments received, how the Council has responded, and also an indication of how the Preferred Options could develop in consideration of the comments.

The Issues and Options Document

- 3.3 The Issues and Options consultation document set out five alternative spatial options and 29 policy options for the future development of the borough. The options were designed to address the key policy issues of the borough, and were informed by the results of the 'Issues, Vision and Objectives' public consultation undertaken in February / March 2011.
- 3.4 The five spatial options indicated the percentage of residential development that would be located in different parts of the borough between 2012 and 2030. In relation to retail development, the consultation document made reference to the Fylde Coast Retail Study which states that 70% of retail will be located in Lytham St Annes, 20% in Kirkham and 10% in the rest of the borough. In relation to employment development, the Fylde Employment Land and Premises Study was completed in August 2012 and was therefore unable to inform the consultation document. The study was instead used to inform the Preferred Options consultation document.

Consultation material

- 3.5 An Issues and Options consultation document was produced for comment. Flyers were produced, which were also used as posters to advertise the consultation, and were displayed in shop windows and parish notice boards around the borough. The flyers were also inserted in the Lytham St Annes Express in the June 7th 2012 edition. The newspaper has a circulation of 9,500.
- 3.6 A booklet was produced which summarised the five spatial options and set out some of the key issues that the Local Plan will address. The two generic banners used during the previous year's 'Issues, Vision and Objectives' consultation were used for the consultation events at the venues. In addition, material for display boards was produced for use at the consultation events at the venues, and this included maps of the five spatial options and information interpreting each of the options. A new banner based on the cover of the consultation document was purchased for use at the outdoor events with the Community Engagement Vehicle (CEV).

Who was consulted

- 3.7 Letters were sent to the consultation bodies set out in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which the Council is required to consult under Regulation 18. These bodies are contained on the Council's Register of Consultees. This is updated regularly to take account of requests received from consultants, organisations, residents and other parties to be informed of future consultations.

How the community was involved

- 3.8 The following methods were used to involve the community. Copies of the consultation materials are included in Appendix 3.
- 3.9 **Letters** were sent out to all the addresses contained in the Register of Consultees informing of the consultation and inviting comments.

Consultation events

- 3.10 Consultation events were held at six venues around the borough to allow the general public and others to view the options and speak with officers. The community engagement vehicle (CEV) was also used at nine locations in the borough to allow further opportunities to engage with the community.
- 3.11 The events at the venues were held at St Annes, Lytham, Kirkham, Warton, Elswick and Staining. The CEV was used at St Annes, Ansdell, Wesham, Freckleton, Wrea Green, Weeton, Newton, Singleton and Squires Gate. The locations are slightly different to those used during the Issues, Vision and Objectives consultation, for the reasons outlined below:
- A venue was used at Warton whilst the CEV was used at Freckleton, because Warton is significantly affected by the options, whilst Freckleton isn't significantly affected.
 - The CEV was used at Ansdell because Lytham St Annes as a whole is considered under the options. Also, given the low attendance at Ansdell during the Issues, Vision and Objectives consultation, it was considered that three venues in this area (as used previously) would be too many.
 - The CEV was used at Wesham rather than a venue because of the close proximity to the event at Kirkham and the low attendance at Wesham during the Issues, Vision and Objectives consultation.
 - The CEV was used at Singleton, as it was considered that there should be fewer venues in the rural area due to the limited impact of the options on the rural areas. Staining and Elswick both had more suitable venues and it was considered that these would be used for the purposes of the consultation.
- 3.12 The two generic pop-up banners from the Issues, Vision and Objectives consultation were used at the venues, and display material was produced for the display boards. Booklets summarising the five spatial option were made available at both the venues and the CEV.

Electronic methods

- 3.13 Users of the Council's Community Forum pages were invited to send in their comments using these methods. The Council's website brought attention to the consultation and invited comments. The Council's Twitter and Facebook pages were not used due to the poor response from these methods during the Issues, Vision and Objectives consultation.

- 3.14 An online questionnaire was made available using Survey Monkey. This consisted of the 29 questions that were set out in the Issues and Options consultation document. The questionnaire could also be downloaded in pdf format and filled-in electronically or printed-off and completed by hand.

Media

- 3.15 A press advert was inserted into the Lytham St Annes Express in the edition of 7th June 2012. The flyer was also inserted into this edition. A press article appeared in the 14th June 2012 edition. The Head of Planning and Regeneration was interviewed both on Radio Wave and BBC Radio Lancashire. A press article was also inserted into the Council's newspaper, 'Fylde Matters,' in June 2012, which is delivered to all homes in the borough.

Posters

- 3.16 The flyers used in the Lytham St Annes Express were also used as posters which were displayed at various locations around the borough, including community centres, post offices and shops.

Councillors

- 3.17 Councillors and parish councillors were informed of the consultation, and were also invited to a Local Plan drop-in event where they were able to view and discuss the options with planning officers before the consultation. A copy of the document was distributed to all councillors.
- 3.18 An additional meeting was held with Westby-with-Plumpton Parish Council where the Head of Planning and Regeneration briefed the local parish councillors in respect of the Issues and Options consultation. The meeting was held because of the potential impact of the options on the area around junction 4 of the M55, in the Westby-with-Plumpton area. There is no defined settlement in the area for a consultation event to be held.

Council staff

- 3.19 Council staff were informed through the Council's intranet and emails were sent to key service heads. There was also an article in the Council's staff newsletter in the May edition. The Council's Management team were briefed by the Head of Planning and Regeneration, and a copy of the document was distributed to all heads of service.
- 3.20 Before the consultation, a 'pre-consultation' took place with key Council officers. A draft of the Issues and Options consultation document was sent to these officers for comments, and these comments were used to amend the document before consultation.
- 3.21 A meeting was held with the Council's Development Management officers in order to consider the consultation document and to answer any questions.

LSP

- 3.22 The LSP Executive was briefed about the consultation by the Principal Planning Officer in April 2012. All LSP theme group members were invited by email to a pre-consultation drop-in event where they were able to view and discuss the options with planning officers before the consultation. All LSP theme group members were also informed of the consultation by email.

Libraries

- 3.23 The consultation document and other consultation material was deposited at all the borough's libraries.

Fylde Showcase Event

- 3.24 Planning officers attended the Fylde Showcase Event at Lytham Hall on Thursday 24th May 2012 in order to promote the Local Plan. More than 50 other groups attended to promote their groups.

Lytham Club Day

- 3.25 During Lytham Club Day, the Planning Policy Manager set up a stall at Lytham Assembly Rooms and was able to talk to members of the Lytham Civic Society, along with members of the public, about the consultation.

Consideration of comments received

- 3.26 In total there were 227 respondents to the consultation. Of these, 101 responded using the online questionnaire, 52 emailed or posted the questionnaire, 63 submitted written comments, and 11 responded using more than one method. Comments received were summarised into a database, divided by chapter and question.
- 3.27 The Part 2 of the original Statement attached in Appendix 4 provides an overview of the comments received, along with the Council's response to the comments, a review of the considerations of the SA, and an outline of considerations for the Preferred Options.
- 3.28 The consultation web page and questionnaire stated that respondents' contact details must be provided for responses to be considered. This helped to prevent multiple responses from the same individual or organisation, and it also allows the respondent to be contacted if a need arises to clarify any comments. Some respondents to the consultation did not include their contact details. Therefore, these responses were not considered.
- 3.29 The Council's IT section was contacted to check that no responses that had been sent by email had been blocked (e.g. considered as SPAM). It was found that there was no evidence of any responses being blocked. One respondent who regularly responds to consultations, but had not on this particular occasion, was contacted to ensure he hadn't sent a response that had somehow been lost. However, the respondent confirmed that he had not responded on this particular occasion.

Consultation evaluation

- 3.30 Three respondents to the consultation made comments in relation to the length of the document. Two of these stated that the document was unwieldy and that the questionnaire was complicated, and one stated that the document was excessive and repetitive, and that action should have been taken to reduce the length of the document.
- 3.31 Given the remit of the Plan in setting out how the borough should be developed in the future, along with the substantial amount of evidence to support this, it was not possible to produce a concise Issues and Options consultation document, particularly given that the document includes both spatial and policy options. When seeking views, we were not seeking comments such as "there is a lot of traffic in our village" or "we need more schools." These issues were raised in the previous consultation. Rather, the Council was seeking views that had been given

detailed thought in terms of the specific policy directions that the Plan should take forward. This inevitably would require an element of reading in order to inform a response. To make it easier to respond, a questionnaire was designed to focus responses through the use of simple tick boxes. In addition, the questionnaire showed the reading that was required for each question. The consultation document was deliberately formatted in a way that made it user friendly, rather than producing pages of solid text with no colour, graphics or photographs. Repetition was required in the text in some instances, so that if the reader was only interested in a certain topic, he did not need to read the whole document. In addition, for those who found the document too unwieldy, a summary leaflet was produced which summarised the five spatial options.

- 3.32 In relation to the community engagement events, the success of these was mixed. Events such as Lytham and Elswick were well attended, whilst the event at Weeton had a very low attendance. The event at Staining was particularly notable as there was an extremely high attendance at this event. This is because the consultation coincided with public knowledge of a pre application enquiry for new housing in the village. The event at Staining was subsequently taken-over by a local action group who provoked a heated response from attendees in relation to future development in the village.
- 3.33 As a result, a disproportionate number of responses to the consultation were received from Staining residents, meaning that the results are not reflective of the borough as a whole. The actions of the local action group was beyond the control of the Council. The Council strives to involve and encourage a wide variety of people, organisations and businesses to comment on its proposals in order to get the most rounded and valuable information with which to help inform its decision making.
- 3.34 Overall, the comments received during the consultation were informative in determining the views of the public and stakeholders in relation to what options are preferred. The comments also bring to light other important considerations that will be taken account of in developing the Preferred Options document.

4. Preferred Option 2013

- 4.1 The Fylde Local Plan to 2030 (Part 1) – Preferred Options was, when it was produced, intended to be the first of two development plan documents that will make up the Fylde Local Plan to 2030. The Preferred Options for the Local Plan (Part 1) set out the preferred policies on housing, employment, the environment and other matters and proposed strategic development sites as part of strategic locations for development. The second part of the Local Plan was to be the Local Plan Part 2: Site Allocations to 2030, which would have included smaller development sites in the urban and rural areas and defined employment areas, areas of public open space and town centre boundaries.
- 4.2 The Preferred Options consultation took place over eight weeks between Thursday 27th June and Thursday 22nd August 2013, and was the fourth consultation on the Local Plan. The consultation took place in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations, 2012.

Consultation material

- 4.3 The Local Plan (Part 1) Preferred Options consultation document was produced for comment. Flyers and posters were produced to advertise the consultation which were displayed at various locations around the borough, including shops and parish notice boards. A booklet was produced which summarised the strategic development locations and strategic sites and set out some of the key preferred policy options. It was handed out to people attending the consultation events
- 4.4 The two generic banners used during the previous year's 'Issues and Options' consultation were used for the consultation events at the venues. In addition, material for display boards was produced for use at the consultation events at the venues, and this included maps of the four strategic development locations with strategic sites and information detailing each of the preferred strategic options.
- 4.5 A CD containing the consultation document and other relevant technical documents were available for individuals to take away. This was particularly useful if people had poor or no internet connections, this is common in rural Fylde.
- 4.6 The Council encouraged respondents to make comments using the online Planning Policy consultation system. Comments could also be submitted on a paper or electronic representation form and returned via freepost or email.

Who was consulted?

- 4.7 Letters were sent to the consultation bodies set out in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which the Council is required to consult under Regulation 18. These bodies are contained on the Council's Register of Consultees. Other relevant bodies and individuals who are registered on the Council's Register of Consultees were notified. The Register of Consultees is updated regularly to take account of requests received from consultants, organisations, residents and other parties to be informed of future consultations.

How the community was involved

- 4.8 The following methods were used to involve the community.

Letters and emails

- 4.9 Letters or emails were sent out to all the addresses contained in the Register of Consultees advising of the consultation and inviting comments.

Consultation events

- 4.10 Consultation events were held at nine venues around the borough to allow the general public and others to view the Preferred Options and speak with officers. The events commenced from the 1st July 2013 and were held at St Annes, Lytham, Kirkham, Wesham, Warton, Elswick, Staining, Fylde-Blackpool Periphery (Marton) and Westby. The events were 'drop ins' and they ran from 3.00 pm – 7.00 pm to allow as many people as possible to attend.
- 4.11 The locations of the events were chosen to correspond with the four strategic locations for development and one in the north of the borough (Elswick). Following the Local Plan Steering Group's request, Councillors, Parish Councils and Ward members were consulted on the choice of venues and given two weeks to respond. In response to this consultation, Staining Parish Council requested a drop-in event at Staining. An event for Westby area was also requested by Cllr Brickles and held at Ballam.
- 4.12 Venues were used for the events as a high turnout was expected. At the Issues and Options consultation a mix of venues and the Council's consultation vehicle were used. The venue in Staining was different to that used during the Issues and Options consultation to provide a more central location within the village, following feedback received about the venue at the Issues and Options consultation.
- 4.13 The two generic pop-up banners from the Issues and Options consultation were used at the venues, and large scale maps and supporting text was produced for the display boards. Summary booklets were available at the venue for individuals to take away and reference copies of the consultation document and supporting technical assessments were available.

Electronic methods

- 4.14 A prominent notice on the Council's home webpage highlighted the consultation and invited comments. A dedicated webpage for the Consultation was established, containing information on the consultation events and consultation material. A link to the Council's Planning Policy Consultation system allowed users to register to view the consultation document and submit representations against the relevant section. The consultation system allows users to view other consultees comments once they have been checked by the Council.
- 4.15 The Council's online forum, Twitter and Facebook pages were not used to collect comments due to the poor response from these methods during the Issues, Vision and Objectives consultation.

Media

- 4.16 Statutory press notices were inserted into the Lytham St Annes Express in the edition of 27th June 2013 and 4th July 2013. A press release was issued on 27th June 2013.

Flyers and posters

- 4.17 Flyers and posters were produced to advertise the consultation and were displayed at various locations around the borough, including shops and parish notice boards.

Councillors

- 4.18 Councillors and parish councillors were informed of the consultation, and were also invited to a Local Plan open session in the Town Hall foyer on 26th June between 2.00 pm and 6.00 pm to view and discuss the preferred options with planning officers before the consultation. A copy of the consultation document was available for each councillor and a copy was provided to each Parish Council.

Council staff

- 4.19 Before the consultation, a 'pre-consultation' took place with key Council officers. A draft of the Preferred Options consultation document was sent to these officers for comments, and these comments were used to amend the document before consultation.
- 4.20 Council officers were informed of the consultation, and were also invited to a Local Plan open session in the Town Hall foyer on 26th June between 2.00 pm and 6.00 pm to view and discuss the preferred options with planning officers before the consultation.
- 4.21 Council staff were informed through the Council's intranet and emails were sent to Heads of Service. There was also an article in the Council's staff newsletter in the June edition. The Council's Management team were briefed by the Head of Planning and Regeneration.

Libraries

- 4.22 The consultation document and other consultation material were deposited at all the borough's libraries.

Warton Armed Forces Day

- 4.23 A Planning officer attended the Warton Armed Forces Day in Warton village on Saturday 29th June 2013 in order to promote the Preferred Options and was able to talk to members of the public about the consultation.

Consideration of comments received

- 4.24 In total there were 691 respondents to the consultation who submitted 2,644 representations. Of these, 40 responded used the online planning policy consultation system, 94 emailed their comments and 557 posted their comments. All representations received were acknowledged and summarised into the Planning Policy consultation database, divided by chapter, policy and/or paragraph. The representations were published online via the online consultation database.
- 4.25 Appendix 6 provides a summary of the representations received, along with the Council's response to the representations and an outline of considerations for the Publication document.
- 4.26 The consultation web page and questionnaire stated that respondents' contact details must be provided for responses to be considered. This helped to prevent multiple responses from the same individual or organisation, and it also allowed the respondent to be contacted if a need arises to clarify any comments. Some respondents to the consultation did not include their contact details. Therefore, these responses were not considered.

Consultation Evaluation

- 4.27 Levels of attendance at the consultation events varied. Warton, Kirkham and Wesham were particularly well attended, whilst the event in Staining had a very low attendance. Many responses were received from Warton, Kirkham and Wesham residents.
- 4.28 The Council received a number of comments in relation to the consultation exercise.
- 4.29 Treales, Roseacre and Wharles Parish Council suggested there should have been a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations. The Preferred Options Consultation followed a similar format to the previous consultation exercises undertaken at the Issues and Options and Issues, Vision and Objectives stages
- 4.30 Some residents commented on the excessive length of the consultation document and associated technical documents. Given the remit of the Plan in setting out how the borough should be developed in the future, along with the substantial amount of evidence needed to support this, it was not possible to produce a short Preferred Options consultation document, particularly given that the document includes both spatial options and development management policies. The Preferred Options consultation document was deliberately written and formatted in a way that made it concise and user friendly with colour, graphics and photographs. In addition, for those who found the document too unwieldy, an 8 page summary leaflet was produced which summarised the key Preferred Spatial and Policy Options.
- 4.31 Respondents commented on the difficulties they encounter using the online consultation system and how time consuming the software is. The Council has been developing the online consultation software and the Preferred Options was the first time the Council had used the software to receive consultation comments. Alongside the Preferred Options consultation, the Council sought feedback on the consultation software. The Council is aware of a number of problems and the consultation system feedback will be used to improve the system. To date, a number of issues have been resolved by the software provider to make the system more user friendly.
- 4.32 Some respondents commented that the representation form was too complex and complicated. The representation form was structured to encourage respondents to provide information and evidence in support of their comments. The consultation sought comments on the whole document. However, it is appreciated that some respondents may only wish to comment on a specific policy, chapter or paragraph. The representation form was designed to ensure that respondents would identify which part of the plan they were responding to. This is important for processing the comments, and ensures that the Council attributes comments to the correct section of the document when processing them.
- 4.33 Some respondents were concerned that Council officers at the consultation events did not write down their comments and this would not be fed into the consultation process. The purpose of the consultation events was to allow the community to discuss the Preferred Option and ask questions. As part of developing the Local Plan, the Council has to provide an audit trail and the community were encouraged to submit their comments in writing. This also prevents officers misinterpreting the verbal comments provide at the consultation events.

- 4.34 A prominent notice was displayed on all consultation material offering further assistance in formulating and submitting consultation comments, in accordance with the Council's Statement of Community Involvement (2011).
- 4.35 Some respondents commented that a six week consultation period was insufficient. The minimum period for statutory consultations on the Local Plan is six weeks. The Council considers eight weeks for consultation to be adequate. The Preferred Options consultation was an informal consultation as part of 'continuous engagement' rather than a statutory consultation.
- 4.36 The Preferred Options document was agreed for consultation at a Special Meeting of the Council on 12th June 2013.

Consultation Summary

- 4.37 Overall, the comments received during the consultation were informative in determining the views of the public and stakeholders in relation to the Preferred Options. The comments also highlighted other important considerations that were taken account of in developing the next version of the Local Plan.

5. Revised Preferred Option 2015

- 5.1 The Council resolved in November 2014 that instead of producing a Local Plan consisting of separate Part 1 (Strategic) and Part 2 (Allocations) Plans, that a single plan would be produced. The result was the Revised Preferred Option (RPO) version of the Fylde Local Plan to 2032, which was agreed for consultation at Fylde Council's Development Management Committee meeting on 16 September 2015.
- 5.2 The RPO version of the Local Plan set out the strategic and non-strategic allocations for new homes and employment land within four Strategic Locations for Development, together with leisure, retail, tourism and community use, or a mixture of such uses. The RPO also comprised development management policies, to inform decisions on planning applications; together with policies to define areas of open space and town centre boundaries and to protect the natural and built environment.
- 5.3 The RPO version was been written to address the key policy issues of the borough, and was informed by the results of the 'Vision , Issues and Objectives' public consultation undertaken in February and March 2011, the 'Issues and Options' public consultation undertaken in June and July 2012, and the Preferred Option consultation carried out in June and August 2013.
- 5.4 The consultation into the RPO version of the Local Plan took place over seven weeks between Thursday 15 October and Thursday 3 December 2015, and was the fourth consultation on the Local Plan. The consultation took place in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations, 2012.
- 5.5 Before the consultation, a 'pre-consultation' took place with statutory consultees and infrastructure providers in June and July 2015. A draft of the RPO consultation document and the Infrastructure Delivery Plan (the IDP) were sent to these officers and organisations for comments, and these comments were used to amend the document before consultation.

Consultation material

- 5.6 The RPO version was produced for comment, together with the draft IDP; and technical assessments including the Health Impact Assessment, Rural Proofing Assessment and Viability Assessment.
- 5.7 A press release was issued and a newspaper advert was placed in the public notices in the Lytham St Annes Express on 12 October 2015 for one week.
- 5.8 Posters were produced to advertise the consultation and were displayed at various locations around the borough, including shops and parish notice boards.
- 5.9 A 12 page booklet was produced which summarised the salient issues in the RPO version of the Local Plan and the Infrastructure Delivery Plan. The booklet was handed out to people attending the consultation events for them to take away. A prominent notice was displayed in the booklets offering further assistance in formulating and submitting consultation comments, in accordance with the Council's Statement of Community Involvement (the SCI, 2011).
- 5.10 The two generic banners used during the initial 'Issues and Options' consultation were used for the consultation drop-in events. In addition, material for display boards was produced for use at the consultation events, and this included maps of strategic and non-strategic sites

across Fylde and information regarding retail centre' boundaries, Areas of Separation and pitches for Gypsies and Travellers, Holiday Areas, The Island Seafront Area, Ribby Hall Village, the Fylde Coast Highways and Transport Masterplan display board, and neighbourhood development planning.

Who was consulted?

- 5.11 Emails or letters were sent to the consultation bodies set out in Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which the council is required to consult under Regulation 18. These bodies are contained on the council's Register of Consultees. Other relevant bodies and individuals who are registered on the council's Register of Consultees were notified. The Register of Consultees is updated regularly to take account of requests received from consultants, organisations, residents and other parties to be informed of future planning policy consultations.
- 5.12 Council staff were informed through the council's intranet and emails were sent to Heads of Service. There was also an article in the council's staff newsletter, 'Grapevine' in the October edition. The council's management team was briefed by the Head of Planning and Regeneration.
- 5.13 The council encouraged respondents to make and submit comments using the online Planning Policy consultation system. A dedicated webpage for the consultation was established, containing information on the drop-in events and consultation material.
- 5.14 A link to the council's online consultation system allowed users to register to view the consultation document. The representation form was structured to encourage respondents to provide information and evidence in support of their comments. The representation form was designed to ensure that respondents would identify which part of the Local Plan, IDP or technical assessments they were responding to. This is important for processing the comments, and ensures that the council attributes comments to the correct section of the document when processing them. The consultation system allows users to view other consultees comments once they have been vetted by the council.
- 5.15 Comments could also be submitted on a paper or electronic representation form and returned via freepost or email.

How the community was involved

- 5.16 **Libraries:** The consultation document and other supporting material and technical assessments were provided on line at all the libraries in the borough. A meeting was held with all Fylde library staff about the local plan and how members of the public could make comments on the document.
- 5.17 **Consultation events:** The RPO consultation followed a similar format to the previous consultation exercises undertaken at the Issues, Vision and Objectives, Issues and Options and Preferred Option stages. Drop-in consultation events were held at nine venues around the borough to allow the general public and others to view the RPO version of the Local Plan and the supporting information and to speak with planning policy officers. The drop-in events commenced on the 19 October and ended on 5 November 2015 and were held at St Annes, Kirkham, Wesham, Warton, Elswick, Staining, Marton (Fylde-Blackpool Periphery), Wrea Green and Newton. The events ran from 3.00 pm – 7.00 pm to allow as many people as possible to attend.

Date	Location	Time
Monday 19 October	Wrea Green – Wrea Green Institute, Station Road, Wrea Green Preston, PR4 2PH	3pm – 7pm
Tuesday 20 October	Staining – St Luke’s Church, Staining Road, Staining, FY3 0BW	3pm – 7pm
Wednesday 21 October	Elswick – Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD	3pm – 7pm
Thursday 22 October	Warton – Warton Village Hall, Church Road, Warton, Preston, PR4 1BD	3pm – 7pm
Tuesday 27 October	Wesham - Kirkham and Wesham Scout Centre, Church Road, Wesham PR4 3DR	3pm – 7pm
Wednesday 28 October	Newton – Newton Village Hall, Vicarage Lane, Newton, Preston, PR4 3RX	3pm – 7pm
Tuesday 3 November	St Annes – Fylde Council, Town Hall, St Annes, FY8 1LW (Foyer Area)	3pm -7pm
Wednesday 4 November	Marton (Blackpool) – St Monica’s Church Hall, St Monica’s Way, Blackpool	3pm – 7pm
Thursday 5 November	Kirkham – Kirkham Community Centre, Mill Street, Kirkham, Preston, PR4 2AN	3pm – 7pm

- 5.18 The locations of the events were chosen to correspond with the four Strategic Locations for Development and also Wrea Green, Staining, Elswick and Newton. An event for Wesham was also requested by Cllr Nulty. Venues were used for the events as a high turnout was expected.
- 5.19 Large scale maps and supporting text mounted on boards were used for the display material. Reference copies of the consultation document and supporting technical assessments were available for people to view and discuss with planning officers.
- 5.20 Levels of attendance at the consultation events varied. Elswick and Warton were particularly well attended, whilst the events in Staining, Wrea Green and Marton had very low attendances.
- 5.21 Councillors and officers were informed of the consultation and the drop-in events, and were invited to all of the drop-in events, including the one in the foyer at St Annes Town Hall on 3 November 2015 between 3.00 pm and 7.00 pm, to view and discuss the RPO version and the related documents. Each councillor and Parish Council was provided with links to the consultation documents on the council’s website.

Consideration of comments received

- 5.22 The consultation webpage and questionnaire stated that respondents’ contact details must be provided for responses to be considered. This helped to prevent multiple responses from the same individual or organisation, and it also allowed the respondent to be contacted if a need arises to clarify any comments. Some respondents to the consultation did not include their contact details. Consequently, these responses were not considered.

- 5.23 In total there were **208** respondents to the Local Plan consultation who submitted **959** representations. Of these, **29** responded using the online planning policy consultation system, **96** emailed their comments and **83** submitted by letter. In addition, a petition was submitted with **32** signatories, objecting to the allocation of 140 homes at Elswick. All representations received have been acknowledged and summarised into the Planning Policy consultation database, divided by chapter, policy and/or paragraph. The majority of responses were received from Elswick residents objecting to the level of housing proposed for the settlement in the RPO version of the Local Plan.

Consultation Summary

- 5.24 Overall, the comments received during the consultation were informative in determining the views of the public and stakeholders in relation to the RPO version of the Local Plan. The comments also highlighted other important considerations that have been taken account of in developing the current version of the Local Plan – the Publication version.
- 5.25 A separate report in Appendix 8 sets out a summary of the representations received as part of the consultation into the RPO version of the Local Plan, along with the council’s response to the representations and recommendations for changes to the text of the Local Plan.

Appendix 1

Vision Issues and Objectives: Consultation Material



Unique Ref No.

Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 4th February 2011

Dear Sir/Madam

Core Strategy. Plan for Fylde Plan for the Future. Vision, Issues and Objectives.

We have your contact details on the Council's Register of Consultees, I write to advise you that the Planning Policy Team are holding community engagement events across the Borough between Monday 7th and Thursday 17th February 2011.

The Council must prepare a "Core Strategy" which will guide the future development of the Borough and we need your input. The consultation is planned to allow members of the public to help shape the future of Fylde for the next 20 years.

We start this process by producing a draft spatial vision which describes what Fylde will be like in 20 years time. Do you agree with our vision? We have also looked at evidence and listed issues for the Borough and areas within it. However, we are very interested to know what you consider to be the main issues. Finally we have drafted some objectives for tackling the issues. Do you agree with these objectives or do you think we should be doing things differently?

Community Engagement Events – How to find Us:

Venue or Bus Location	Date	Time
Car Park, Morrisons, Squires Gate Lane, Blackpool , FY4 2AY	Monday 7th February	10am - 1pm
Kirkham Community Centre, Mill Street, Kirkham , PR4 2AN	Monday 7th February	3pm - 7pm
Car Park in front of the Scout Hut, Lytham Road, Warton , PR4 1XE	Tuesday 8th February	10am - 1pm
Ansdell Institute, Woodlands Road, Ansdell , FY8 4BX	Tuesday 8th February	3pm - 7pm
Car Park, The Square, St Anne's Road West, St Anne's , FY8 1RN	Wednesday 9th February	10am - 1pm
Elswick Village Hall, Roseacre Road, Elswick , PR4 3UD	Wednesday 9th February	3pm - 7pm
Car Park, Booths, Haven Road, Lytham , FY8 5EG	Thursday 10th February	10am - 1pm
Singleton Village Hall, Station Road, Singleton , FY6 8LL	Thursday 10th February	3pm - 7pm
Car Park, Newton Village Stores, Bryning Lane, Newton , PR4 3RN	Friday 11th February	10am - 1pm
Outside the Post Office, Wrea Green , PR4 2NE	Monday 14th February	10am - 1pm
United Reformed Church Annex, Clifton Drive North, St Anne's , FY8 2AE	Monday 14th February	3pm - 7pm
Car Park, Weeton Village Hall, Knowsley Crescent, Weeton , PR4 3ND	Tuesday 15th February	10am - 1pm
Freckleton Village Hall, School Lane, Freckleton , PR4 1PJ	Tuesday 15th February	3pm - 7pm
Great Eccleston Farmers' Market, The Square, Great Eccleston , PR3 0ZB	Wednesday 16th February	9am - 3pm
Staining Village Hall, Chain Lane, Staining , FY3 0DD	Wednesday 16th February	3pm - 7pm
Car Park, Morrisons, Mill Street, Kirkham , PR4 2AN	Thursday 17th February	10am - 2pm
Lytham Assembly Rooms, Dicconson Terrace, Lytham , FY8 5JY	Thursday 17th February	3pm - 7pm

Alternatively, if you are unable to attend a community engagement event, there will be an opportunity to submit written comments. The Vision, Issues and Objectives are available at www.fylde.gov.uk/core-strategy. Please use the comment form.

All written comments must be received by Friday 25th March 2011.

Comments should be sent either by post to Planning Policy Section, Fylde Borough Council, Town Hall, Lytham St Annes, FY8 1LW or can be emailed to planningpolicy@fylde.gov.uk.

You can also send your comments in a message to the Council's Facebook <http://www.facebook.com/fylde> , Twitter <http://twitter.com.fyldecouncil> and Fylde Forum <http://www.fyldeforum.co.uk> pages.

If you require any further assistance regarding any of these matters, please do not hesitate to contact the Planning Policy Team on 01253 658418 or email planningpolicy@fylde.gov.uk. Further information is available online at www.fylde.gov.uk/core-strategy, at local libraries in Fylde or at Fylde Direct.

You are receiving this consultation letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters and/or the contact details we have are incorrect please let us know by telephoning Sally Thompson on 01253 658686.

All comments received as part of the consultation will be summarised and added to the existing evidence base collected so far. This evidence will be used to write the "draft Vision, Issues and Objectives" document which you will have an opportunity to comment on later in the year.

Yours faithfully,



Planning Policy Manager

Town Hall, Lytham St. Annes, Lancashire, FY8 1LW
Telephone: 01253 658658 Fax: 01253 713113 Web: www.fylde.gov.uk

Poster:

Plan for Fylde Plan for the Future

What are the **BIG** planning issues that concern you?

Are you concerned about the local environment?
 Do you have difficulty accessing local services?
 Are you happy with your housing and employment?

What sort of place would you like Fylde to be in 20 years time?

Have your say at one of our community engagement events between
 7th – 17th February 2011, as listed below:

Venue or Bus Location	Date	Time
Car Park, Morrisons, Squires Gate Lane, Blackpool, FY4 2AY	Monday 7th February	10am - 1pm
Kirkham Community Centre, Mill Street, Kirkham, PR4 2AN	Monday 7th February	3pm - 7pm
Car Park in front of the Scout Hut, Lytham Road, Warton, PR4 1XE	Tuesday 8th February	10am - 1pm
Ansdell Institute, Woodlands Road, Ansdell, FY8 4BX	Tuesday 8th February	3pm - 7pm
Car Park, The Square, St Anne's Road West, St Anne's, FY8 1RN	Wednesday 9th February	10am - 1pm
Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD	Wednesday 9th February	3pm - 7pm
Car Park, Booths, Haven Road, Lytham, FY8 5EG	Thursday 10th February	10am - 1pm
Singleton Village Hall, Station Road, Singleton, FY8 8LL	Thursday 10th February	3pm - 7pm
Car Park, Newton Village Stores, Bryning Lane, Newton, PR4 3RN	Friday 11th February	10am - 1pm
Outside the Post Office, Wrea Green, PR4 2NE	Monday 14th February	10am - 1pm
United Reformed Church Annex, Clifton Drive North, St Anne's, FY8 2AE	Monday 14th February	3pm - 7pm
Car Park, Weeton Village Hall, Knowsley Crescent, Weeton, PR4 3ND	Tuesday 15th February	10am - 1pm
Freckleton Village Hall, School Lane, Freckleton, PR4 1PJ	Tuesday 15th February	3pm - 7pm
Great Eccleston Farmers' Market, The Square, Great Eccleston, PR3 0ZB	Wednesday 16th February	9am - 3pm
Staining Village Hall, Chain Lane, Staining, FY3 0DD	Wednesday 16th February	3pm - 7pm
Car Park, Morrisons, Mill Street, Kirkham, PR4 2AN	Thursday 17th February	10am - 2pm
Lytham Assembly Rooms, Dicconson Terrace, Lytham, FY8 5JY	Thursday 17th February	3pm - 7pm

If you would like more information, please contact the Planning Policy team on
 01253 658418, email planningpolicy@fylde.gov.uk or go online www.fylde.gov.uk/core-strategy



FYLDE BOROUGH COUNCIL

Leaflet:

Plan for Fylde - Plan for the Future
It's your Fylde – so tell us your vision for the next 20 years

Community Engagement Events
7th - 17th February 2011

FYLDE BOROUGH COUNCIL



Planning shapes the places where we live and work. It improves the built, economic and social environments of communities.

The Council must produce a plan called a Core Strategy which will guide the future development of the Borough. This is your chance to be involved in shaping Fylde's future.

We wish to seek your opinion on the main issues facing the Borough over the next 20 years, whether you agree with our objectives and what the future spatial vision of Fylde should include.

Issues



Evidence collected so far has highlighted many issues for the Borough, including:

- Access to affordable housing
- Lack of a diverse local economy
- Decline in overnight tourists
- Potential loss/deterioration of important habitats, landscapes, coast and countryside
- Climate change adaption and mitigation
- Ensuring adequate school place provision
- Wastewater capacity and impact on bathing water quality
- Fear of crime and anti social behaviour



Have we identified the issues that you think are important? Have we missed any issues?



Objectives

These objectives aim to address all the issues identified. They are strategic objectives and therefore take a broad brush approach:

1. To create sustainable communities
2. To improve the environment
3. Making services accessible
4. To regenerate the local economy
5. To develop socially cohesive, diverse and healthy communities

Do you agree with the objectives, or do you think we should be doing things differently?



Spatial Vision

This will establish a long term vision for the Borough and describe how it should develop over future years. Topics could include:

- Environmental issues
- Sports and recreation
- Retail development
- Infrastructure and service provision
- Tourism
- Distribution of employment and housing land

What do you think the future spatial vision for Fylde should include or look like? We have produced a draft spatial vision, do you agree with how it describes Fylde in 20 years time?*

How to get involved and comment

Visit a community engagement event 7-17 th February 2011	Email or post your completed comment form, to be received by 25 th March 2011	Send a message on Facebook, Twitter or Fylde Forum by 25 th March 2011
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*available online, at Fylde local libraries and Fylde Direct, St Annes



Community Engagement Events – How to find us

Events will take place between 7th - 17th February 2011, as listed below. This is your chance to discuss and comment on the issues, vision and objectives with Fylde Borough Council's Planners.

Venue or Bus Location	Date	Time
Car Park, Morrisons, Squires Gate Lane, Blackpool, FY4 2AY	Monday 7th February	10am - 1pm
Kirkham Community Centre, Mill Street, Kirkham, PR4 2AN	Monday 7th February	3pm - 7pm
Car Park in front of the Scout Hut, Lytham Road, Warton, PR4 1XE	Tuesday 8th February	10am - 1pm
Ansdell Institute, Woodlands Road, Ansdell, FY8 4BX	Tuesday 8th February	3pm - 7pm
Car Park, The Square, St Anne's Road West, St Anne's, FY8 1RN	Wednesday 9th February	10am - 1pm
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Singleton Village Hall, Station Road, Singleton, FY6 8LL	Thursday 10th February	3pm - 7pm
Car Park, Newton Village Stores, Bryning Lane, Newton, PR4 3RN	Friday 11th February	10am - 1pm
Outside the Post Office, Wrea Green, PR4 2NE	Monday 14th February	10am - 1pm
United Reformed Church Annex, Clifton Drive North, St Anne's, FY8 2AE	Monday 14th February	3pm - 7pm
Car Park, Weeton Village Hall, Knowsley Crescent, Weeton, PR4 3ND	Tuesday 15th February	10am - 1pm
Freckleton Village Hall, School Lane, Freckleton, PR4 1PJ	Tuesday 15th February	3pm - 7pm
Great Eccleston Farmers' Market, The Square, Great Eccleston, PR3 0ZB	Wednesday 16th February	9am - 3pm
Staining Village Hall, Chain Lane, Staining, FY3 0DD	Wednesday 16th February	3pm - 7pm
Car Park, Morrisons, Mill Street, Kirkham, PR4 2AN	Thursday 17th February	10am - 2pm
Lytham Assembly Rooms, Dicconson Terrace, Lytham, FY8 5JY	Thursday 17th February	3pm - 7pm

Comment forms and further information can be found online, at Fylde local libraries or at Fylde Direct, alternatively please contact the Planning Policy team:

**Planning Policy,
Fylde Borough Council,
Town Hall,
Lytham St. Annes,
Lancashire,
FY8 1LW**

Tel: 01253 658418
Email: planningpolicy@fylde.gov.uk
Web: www.fylde.gov.uk/core-strategy
Facebook: <http://www.facebook.com/fylde>
Twitter: <http://twitter.com/fyldecouncil>
Fylde Forum: <http://www.fyldeforum.co.uk>



FYLDE BOROUGH COUNCIL

Plan for Fylde – Plan for the Future

Comments Form

Please return this form to arrive no later than 5pm on Friday 25th March 2011

<ul style="list-style-type: none"> If necessary you may photocopy this form. Complete all sections clearly using black ink (or type). Return this form to the address given overleaf to arrive no later than Friday 25th March 2011. 	
Our reference:	
(If applicable, please refer to your cover letter)	
Personal Details:	
Contact Name:	
Organisation:	
Address:	
Post Code:	
E-mail:	
Tel:	Fax:

Borough Wide Vision Comments

- We have produced a draft spatial vision, do you agree with how it describes Fylde in 20 years time or do you think it should say something different? Do you have evidence of why the vision should be different? Continue on a separate page if required.

Area Specific Vision Comments

- We have produced a draft spatial vision, do you agree with how it describes your area in 20 years time or do you think it should say something different? Do you have evidence of why the vision should be different? Please state the area you are referring to e.g Weeton. Continue on a separate page if required.

Vision Comments

- What do you think the future spatial vision for Fylde should include or look like?

Borough Wide Issues Comments

4. Have we identified the issues that you think are important for the Borough? Have we missed any issues? Do you have evidence of the issues? Continue on a separate page if required.

Area Specific Issues Comments

5. Have we identified the issues that you think are important for your area? Have we missed any issues? Do you have evidence of the issues? Please state the area you are referring to e.g Weeton. Continue on a separate page if required.

Objectives Comments

6. Do you agree with the objectives, or do you think we should be doing things differently?

Any other comments:

Next Stage

The Council will summarise all the comments they have received and add them to the existing evidence base which has been collated so far. This evidence will be used to write a "Draft Vision, Issues and Objectives" document which you will then have an opportunity to comment on in the spring.

A summary of the comments received will be published on the Council's website www.fylde.gov.uk/core-strategy

Please indicate below if you wish to be kept on the Planning Policy consultation database. You will be informed about the Draft Vision, Issues and Objectives document and other Local Development Framework matters.

Yes No

Signature:

Date:

Please return this form to arrive no later than 5pm on Friday 25th March 2011 to:

By Post: Planning Policy
Fylde Borough Council
Town Hall
Lytham St Annes
FY8 1LW

By email: planningpolicy@fylde.gov.uk

Comments cannot be treated as confidential. They will be publicly available. Thank you for your response

This and other Local Development Framework (LDF) documents will be made available on request in large copy print, audiocassette, Braille or languages other than English. All requests for LDF documents in different formats should be made in the first instance to the Planning Policy Team. The Council will meet the cost of any reasonable request for providing LDF documents in different formats.

CONSULTATION MONITORING FORM

The Council is committed to promoting public consultation and community engagement. This commitment is based on a belief that successfully promoting the social, economic and environmental wellbeing of the community depends upon everyone having a stake in the future of the Borough.

The completion of this form will help us to evaluate the consultation event (i.e. identify unsuccessful consultation methods) in order to improve future events.

Please note: The completion of this form is **optional**. The Council will not draw any conclusion from a non completed form. The Consultation Monitoring Form will be separated from your consultation comments and will not be traced back to an individual. Any information provided will be kept confidential. At the end of the consultation, the Consultation Monitoring Forms will be collated and the overall findings (e.g percentage of respondents who found out about the consultation by newspaper advert/notice) will be analysed and presented as part of a Consultation Statement, which will be published on the Council's website.

How did you find out about this consultation? Please tick all that apply					
Newspaper advert / notice	<input type="checkbox"/>	Town/ Parish Council	<input type="checkbox"/>	Letter / email from Council	<input type="checkbox"/>
Newspaper leaflet	<input type="checkbox"/>	Council website	<input type="checkbox"/>	Employment event	<input type="checkbox"/>
Council poster	<input type="checkbox"/>	Councillors	<input type="checkbox"/>	School event	<input type="checkbox"/>
Council exhibition/event	<input type="checkbox"/>	Radio	<input type="checkbox"/>	Word of mouth	<input type="checkbox"/>
Library	<input type="checkbox"/>	Other (please specify):			

Further comments on the current consultation

Thank you for taking time to fill in this form - responses will be treated as confidential

Please indicate below if you wish to be kept on the Planning Policy consultation database. You will be informed about other plan making consultations and events.			
Yes - complete contact details below	<input type="checkbox"/>	No	<input type="checkbox"/>
Name:			
Organisation:			
Address:			Postcode:
Telephone:		Mobile:	
Email Address:			
Fax:			
Preferred contact method:	Email:	<input type="checkbox"/>	Letter: <input type="checkbox"/>

EQUALITY MONITORING FORM

The Council is committed to valuing diversity and promoting and implementing equality of opportunity in all its activities. This commitment is based on a belief that successfully promoting the social, economic and environmental wellbeing of the community depends upon everyone having a stake in the future of the Borough.

The completion of this form will help us to reduce the disadvantages experienced by many people by making our activities more responsive to the different and various individual and community needs evident throughout Fylde. The Council values the diversity of the population of the Borough and wants its activities to be accessible, relevant and meaningful to everyone.

Please note: The completion of this form is **optional**. The Council will not draw any conclusion from a non completed form or from a response which selects prefer not to say. The Equality Monitoring Form will be separated from your consultation comments and will not be traced back to an individual. Any information provided will be kept confidential. At the end of the consultation, the Equality Forms will be collated and the overall findings (e.g. percentage of respondents who were “male”) will be analysed and presented as part of a Consultation Statement, which will be published on the Council’s website.

Gender		Age		Sexual Orientation		Marital/Civic Partnership	
Male	<input type="checkbox"/>	0-14	<input type="checkbox"/>	Bisexual	<input type="checkbox"/>	Single (never married)	<input type="checkbox"/>
Female	<input type="checkbox"/>	15-24	<input type="checkbox"/>	Gay man	<input type="checkbox"/>	Married	<input type="checkbox"/>
Transgender	<input type="checkbox"/>	25-44	<input type="checkbox"/>	Gay woman/lesbian	<input type="checkbox"/>	Civil Partnership	<input type="checkbox"/>
Prefer not to say	<input type="checkbox"/>	45-64	<input type="checkbox"/>	Heterosexual (straight)	<input type="checkbox"/>	Separated	<input type="checkbox"/>
		65+	<input type="checkbox"/>	Other	<input type="checkbox"/>	Divorced	<input type="checkbox"/>
		Prefer not to say	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>	Widowed	<input type="checkbox"/>
						Prefer not to say	<input type="checkbox"/>

Ethnicity									
White		Black or Black British		Mixed		Asian or Asian British		Other	
British	<input type="checkbox"/>	Black Caribbean	<input type="checkbox"/>	White and Black Caribbean	<input type="checkbox"/>	Indian	<input type="checkbox"/>	Chinese	<input type="checkbox"/>
Irish	<input type="checkbox"/>	Black African	<input type="checkbox"/>	White and Black African	<input type="checkbox"/>	Pakistani	<input type="checkbox"/>	Other	<input type="checkbox"/>
Other White	<input type="checkbox"/>	Other Black	<input type="checkbox"/>	White and Asian	<input type="checkbox"/>	Bangladeshi	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>
				Other Mixed	<input type="checkbox"/>	Other Asian	<input type="checkbox"/>		

Religion or Belief					
Christian	<input type="checkbox"/>	Jewish	<input type="checkbox"/>	Other	<input type="checkbox"/>
Buddhist	<input type="checkbox"/>	Muslim	<input type="checkbox"/>	No religion or belief	<input type="checkbox"/>
Hindu	<input type="checkbox"/>	Sikh	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>

Disability					
The Equality Act 2010 considers a person disabled if: <i>You have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on your ability to carry out normal day-to-day activities.</i>					
Do you consider yourself to be disabled as set out under the Equality Act 2010?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Prefer not to say	<input type="checkbox"/>

Thank you for taking time to fill in this form – responses will be treated as confidential



Date: 27 January 2011

Ref: PR/XXX/2011

Press Release – for release Thursday 27 January

Help us plan for the next generation

A massive consultation is planned to allow members of the public to help shape the future of Fylde for the next 20 years.

From 7 to 17 February, Fylde Council's planners will be meeting the public at 17 locations across the borough.

- Are you worried that your children or grandchildren will not be able to afford to buy a house or get a job in the area?
- Are you concerned about the local environment, both built and natural?
- Should Fylde stay as it is or would you like to see it change?

Fylde Borough Council's planners will be coming to seek your views on the main planning policy issues facing the borough over the next 20 years. The council must prepare a "Core Strategy" which will guide the future development of the borough and we need your input.

Mark Evans, Assistant Director: Planning Services, said: "Before work is started on the new plan that will direct future development in Fylde, we need to establish what type of place Fylde will be in 20 years time.

"This 'Vision' is not the vision of the council, but of the wider community and so we want local people to tell us how they see Fylde as an area to live, work and relax in the future.

"We want to know what is important to people, what should change and what should be preserved. We also need to know the various issues facing the communities that make up Fylde borough. If we know what the issues are, a plan can be produced that addresses the real issues and seeks to achieve a common vision."

Community engagement events will take place in venues and a mobile unit across the borough between 7 and 17 February as listed below. This is your chance to be involved in shaping Fylde's future. Don't miss out.

Appendix 1: Vision Issues and Objectives: Consultation Materials

Venue or bus location	Date	Time
Car park, Morrisons, Squires Gate Lane, Blackpool, FY4 2AY	Monday 7 February	10am - 1pm
Kirkham Community Centre, Mill Street, Kirkham, PR4 2AN	Monday 7 February	3-7pm
Car park in front of the Scout Hut, Lytham Road, Warton, PR4 1XE	Tuesday 8 February	10am - 1pm
Ansdell Institute, Woodlands Road, Ansdell, FY8 4BX	Tuesday 8 February	3-7pm
Car park, The Square, St Anne's Road West, St Annes, FY8 1RN	Wednesday 9 February	10am - 1pm
Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD	Wednesday 9 February	3-7pm
Car park, Booths, Haven Road, Lytham, FY8 5EG	Thursday 10 February	10am - 1pm
Singleton Village Hall, Station Road, Singleton, FY6 8LL	Thursday 10 February	3-7pm
Car park, Newton Village Stores, Bryning Lane, Newton, PR4 3RN	Friday 11 February	10am - 1pm
Outside Post Office, Wrea Green, PR4 2NE	Monday 14 February	10am - 1pm
United Reformed Church Annex, Clifton Drive North, St Annes, FY8 2AE	Monday 14 February	3-7pm
Car park, Weeton Village Hall, Knowsley Crescent, Weeton, PR4 3ND	Tuesday 15 February	10am - 1pm
Freckleton Village Hall, School Lane, Freckleton, PR4 1PJ	Tuesday 15 February	3-7pm
Great Eccleston Farmers' Market, The Square, Great Eccleston, PR3 0ZB	Wednesday 16 February	9am - 3pm
Staining Village Hall, Chain Lane, Staining, FY3 0DD	Wednesday 16 February	3-7pm
Car park, Morrisons, Mill Street, Kirkham, PR4 2AN	Thursday 17 February	10am - 2pm
Lytham Assembly Rooms, Dicconson Terrace, Lytham, FY8 5JY	Thursday 17 February	3-7pm

If you would like more information please contact Mark Evans, assistant director: planning services, on 01253 658460 or email planningpolicy@fylde.gov.uk

OFFICE NOTE:

AGREED BY MARK EVANS, JULIE GLAISTER AND NEIL GRAHAM.

Marks contact details only to be given to the press and the generic contact details to be used for all other material.

Sally

Proforma for recording interviews

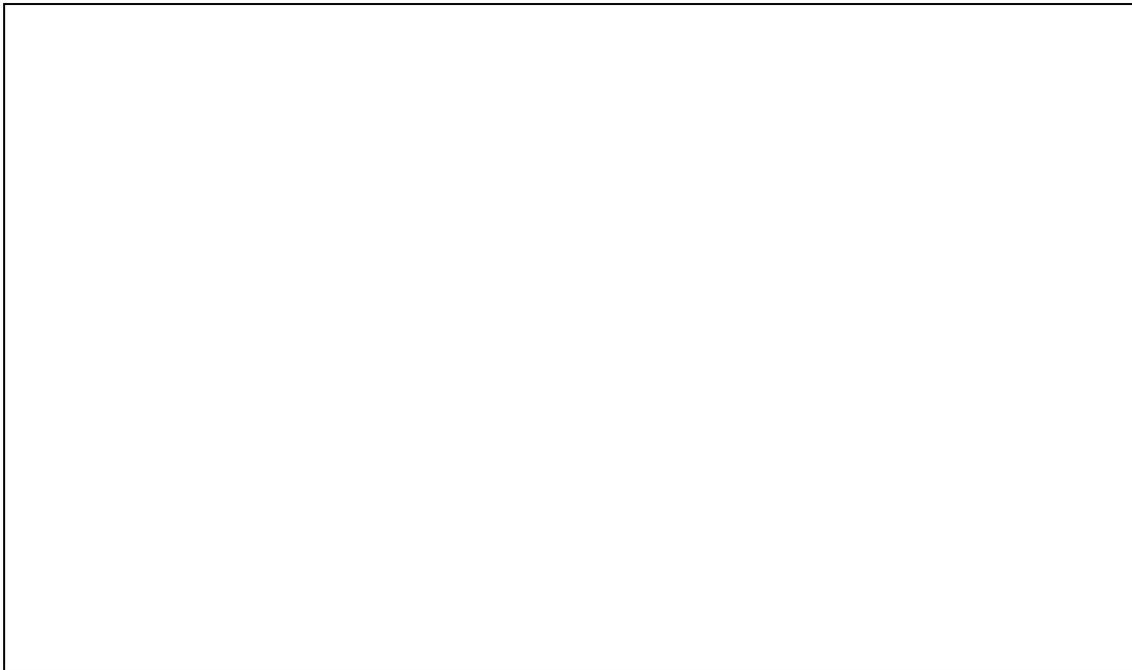
Drop-in event, Core Strategy, February 2011

Location	Officer

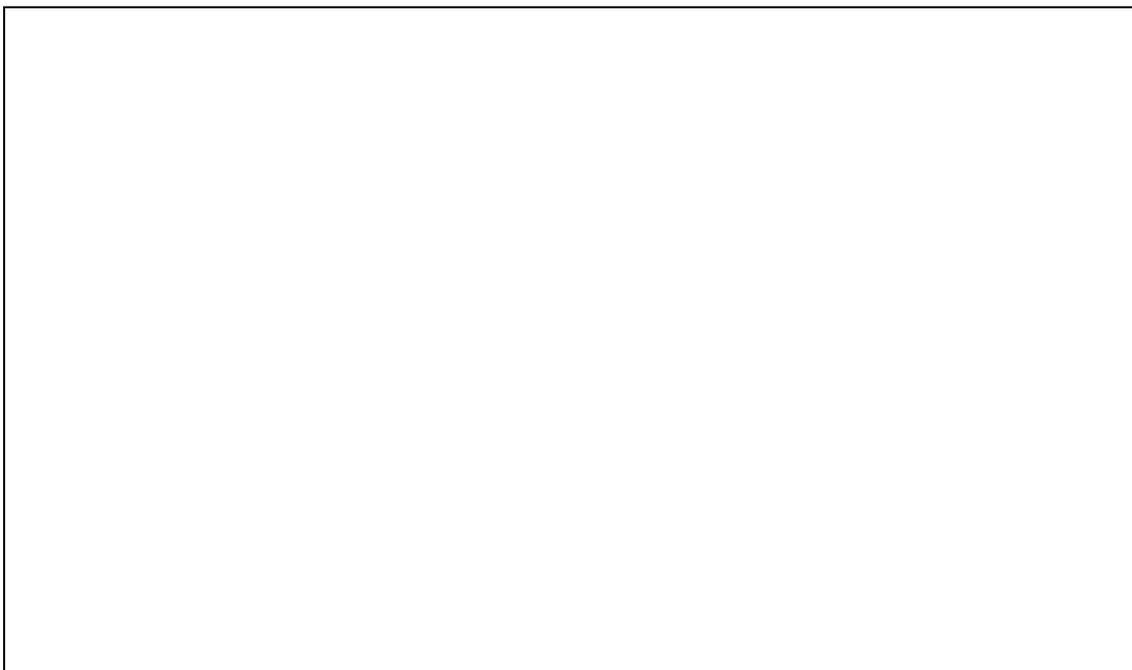
Date	Time

**Q1. What are the BIG local issues that concern you?
Why are these issues important to you?**

Q2. What sort of place would you like Fylde to be in 20 years time? Why?
Can you think of another place you would like Fylde to be like?



Q3. What aspects of Fylde should stay as they are? How would you like it to change?
What changes would make you want to leave?
What changes would make you want to stay?



Q4. Do you have any other comments?

--

Personal details

Name
Email
Area of residence
Place of work (e.g. BAe)

Address

Postcode

Age
<input type="checkbox"/> 0-14 <input type="checkbox"/> 15-24 <input type="checkbox"/> 25-44 <input type="checkbox"/> 45-64 <input type="checkbox"/> 65+ <input type="checkbox"/> Prefer not to say

Regulation 25 consultation letter:



XXX
XXX
XXX
XXX
XXX
XXX

Unique Ref No:

Your Ref:

Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 17 May 2011

Dear Sir/Madam,

**FYLDE BOROUGH DEVELOPMENT PLAN DOCUMENTS
CONSULTATION AS REQUIRED BY REGULATION 25 OF THE TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 (No.2204)**

FYLDE CORE STRATEGY

Fylde Borough Council, as Local Planning Authority is now proposing to prepare a series of Development Plan Documents which together will form the Local Development Framework (the 'LDF'). This will update and replace the current Local Plan.

The Council is proposing to prepare the Fylde Core Strategy which will be the central component of the LDF. It will contain statements of:-

- (i) the development and use of land which the Council wish to encourage during lifetime of the Strategy;
- (ii) objectives relating to design and access which the Council wish to encourage;
- (iii) any environmental, social and economic objectives which are relevant to the attainment of the development and use of land as mentioned in paragraph (i); and
- (iv) the Council's general policies in respect of the matters referred to in paragraphs (i) to (iii);

The Council is proposing that it shall contain the subjects, topics or themes listed below:-

- Settlement hierarchy
- Greenbelt
- Countryside
- Housing
- Employment
- Retail
- Heritage
- Biodiversity
- Culture
- Landscape
- Waste
- Minerals

- Flooding
- Open Space
- Transport
- Townscape
- Contaminated land
- Air Quality
- Rural
- Demographics
- Climate change
- Infrastructure Plan
- Replacement of saved polices
- Monitoring and Review

You are now invited to make representations to us about what the Fylde Core Strategy ought to contain. It is important to note that if you made a response to the Issues consultation in February / March 2011, you do not need to repeat the feedback you have already given us.

We would be pleased to receive your representations electronically. These can be emailed to planningpolicy@fylde.gov.uk or complete the Representation Form online at www.fylde.gov.uk/Regulation25

Alternatively please send your representations on the enclosed Representation Form to Planning Policy, Fylde Borough Council, Town Hall, Lytham St. Annes, Lancashire, FY8 1LW.

Representation Forms can also be obtained from Fylde Direct Office, Clifton Drive South, St. Annes, open Monday – Thursday 8.30-17.00 and Friday 8.30-16.30 and at: Freckleton Library, Preston Old Road, Freckleton; Kirkham Library, Station Road, Kirkham; Lytham Library, Clifton Street, Lytham; St. Annes Central Library, 254 Clifton Drive South, St. Annes; and Ansdell Library, 59 Commonside, Ansdell; during normal library hours.

Please note the closing date for submitting your representations is 5pm on Friday 1st July 2011.

Any representations made to us in response to this invitation and in response to the Issues Consultation in February/March 2011 will be taken into account in preparing the Fylde Core Strategy.

Yours faithfully,



Planning Policy Manager

**FYLDE BOROUGH DEVELOPMENT PLAN DOCUMENTS
CONSULTATION AS REQUIRED BY REGULATION 25 OF THE TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 (No.2204)**

**FYLDE CORE STRATEGY
REPRESENTATION FORM**

Thank you for taking the time to feedback. Your representations will be taken into account in developing Fylde's Core Strategy.

Returning your form

Please send this form to Planning Policy, Fylde Borough Council, Town Hall, Lytham St. Annes, Lancashire, FY8 1LW

Closing date: 5pm Friday 1st July 2011

Are there any other matters (i.e. subjects, topics or themes) that you feel the Fylde Core Strategy should contain?

Please continue on additional page if necessary

Name _____

Unique reference number (if stated on cover letter) _____

Address _____

Postcode _____

Tel _____

Email _____

Are you representing an organisation (circle your answer)? **Yes / No**

If 'yes' please state which organisation _____

Representations cannot be treated as confidential. They will be publicly available. Thank you for your response

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the department. Personal data will be processed in accordance with DPA.

This and other Local Development Framework (LDF) documents will be made available on request in large copy print, audiocassette, Braille or languages other than English. All requests for LDF documents in different formats should be made in the first instance to the Planning Policy Team. The Council will meet the cost of any reasonable request for providing LDF documents in different formats.

**FYLDE BOROUGH DEVELOPMENT PLAN DOCUMENTS
CONSULTATION AS REQUIRED BY REGULATION 25 OF THE TOWN AND COUNTRY
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- (iv) the Council's general policies in respect of the matters referred to in paragraphs (i) to (iii);

The Council is proposing that it shall contain the subjects, topics or themes listed below:-

- | | |
|------------------------|--------------------------------|
| • Settlement hierarchy | • Heritage |
| • Greenbelt | • Biodiversity |
| • Countryside | • Culture |
| • Housing | • Landscape |
| • Employment | • Waste |
| • Retail | • Minerals |
| • Flooding | • Rural |
| • Open Space | • Demographics |
| • Transport | • Climate change |
| • Townscape | • Infrastructure Plan |
| • Contaminated land | • Replacement of saved polices |
| • Air Quality | • Monitoring and Review |

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Clifton Street, Lytham; St. Annes Central Library, 254 Clifton Drive South, St. Annes; and Ansdell Library, 59 Commonside, Ansdell; during normal library hours.

Please note the closing date for submitting your representations is 5pm on Friday 1st July 2011.

Any representations made to us in response to this invitation and in response to the Issues Consultation in February/March 2011 will be taken into account in preparing the Fylde Core Strategy.

Appendix 2:

Vision, Issues and Objectives: Consultation Responses

Representations (taken from the report to the Local Development Framework Steering Group, 17th October 2011)

Many comments were received, many of which consisted of issues that the Core Strategy cannot address. For example, many comments were made in relation to bin collections, dog fouling and litter. These, of course, are not matters that are suitable for a Core Strategy to address.

Due to the volume of comment received, we have not included the full summaries of the comments with this report. However, for information, a summary of the comments received in writing by the statutory consultees is set out separately below.

An overview of the new issues being considered are summarised below. These are issues that were raised during the consultation that are relevant to the Core Strategy. Evidence is being gathered to support these issues, which means that they will be subject to change. For example, evidence to support an issue for Kirkham may also show the issue to be relevant borough wide, which means that the issues will need to be amended accordingly. Also, as stated earlier, any issue that cannot be supported by evidence will be removed.

The separate document Changes Made to the Issues in Response to Comments Made During the Consultation, reproduced below, sets out the issues in full, with tracked changes showing the amendments that have been made to the issues in response to the comments made during the consultation. Due to the volume of comments received, it is not practical to set out exactly who said what, particularly as at the drop-in events we talked with people 'on mass.' However, an indication of the source of the comments is given in the footnotes.

General

The age structure of the borough was raised as an issue, with comments stating that there is a higher proportion of older people and lower proportion of working age and younger people. Comments were made in relation to Kirkham and Wesham about a lack of elderly facilities in the area, with concern being raised over the closure of the elderly unit on Mowbreck Lane. Also, the Medlar with Wesham parish plan states that more social activities and adult education for the elderly is required.

Comments were made stating that there is a drug and alcohol problem in St. Annes. Perception and fear of crime was set out as an issue in the Freckleton Parish Plan, whilst people from Warton were concerned about crime and antisocial behaviour. The condition of Fairhaven Lake was raised as an issue during the consultation, and other comments stated that there is a need for indoor attractions in Lytham.

There was a specific comment which mentioned that there is a high concentration of takeaways on St. Alban's Road in St. Annes. The results of the town plan household and student surveys for St. Annes showed that many people believe that there is a lack of recreational facilities for youths in St. Annes. The surveys also show that many people believe that the evening entertainment and nightlife is limited, which raises an issue about the night time economy in St. Annes.

Housing

There were mixed comments on the housing issues of the borough, with some comments stating that there is a need for family housing, whilst others stated that family housing is not required. There were also mixed views on affordable housing, with some comments stating that affordable housing is needed, whilst others disagreed.

The Town Plan Household Survey for St. Annes showed that many residents were concerned about the large number of flats in St. Annes, and comments received by letter also showed this to be a concern for many residents. Comments were made at the community engagement events about there being too many retirement flats in St. Annes. These comments highlight the need to provide the right type and number of new homes for current and future generations across the borough.

Empty homes was raised as an issue across the borough, including in Lytham and St. Annes, where the evidence gathered so far shows the majority of empty properties to be located. Regarding new housing, it was raised that some new housing developments lack a 'sense of place' and are of poor quality design with intensive layout.

Economy

The loss of large employers was raised as an issue, along with the need to retain those that remain. There was also concern about the lack of sustainable local employment in the borough, with a comment stating that there is a lack of public transport access to Whitehills Business Park, and other comments stating that there is a lack of local jobs for local people in the villages. The parish plans highlighted similar issues in relation to local jobs.

Falling employment levels was raised as an issue in the comments, and a lack of incentives for businesses to move to St. Annes was raised as an issue in the Town Plan Household Survey for St. Annes.

The need to attract tourism trade to the town centre rather than just the promenade was raised as an issue in the Town Plan Business Survey for St. Annes. Employment opportunities for young people and graduates was also raised as an issue. Comments made by the schools and the Youth Council, and comments from the community engagement events, stated that there are limited job prospects for young people in the borough. Comments were received stating that there is a limited selection of supermarkets in St. Annes. However, this is an example of an issue that the Core Strategy cannot address.

Comments were made in relation to the retail provision of the town centres, in particular that there is a limited amount of shops and a limited variety of shops. Significant incommuting into the borough was raised as an issue in some of the comments received. Some comments stated that there are too many charity shops, bargain shops and empty shops, which raises the issue of the vitality and viability of the town centres. Loss of caravan pitches to residential development was also raised as an issue.

Environment

There were many comments which stated that the countryside must be protected. However, this is more suitable as an objective rather than an issue, and has therefore not been included in the list of issues. The existing list of issues already sets out the potential loss of countryside as a borough wide issue. Some comments raised specific concerns about settlements potentially merging, and this has been included in the list of issues.

Some comments stated that there is a lack of woodland in the borough, and that there is a lack of trees in some of the settlements. There was some concern about the historic environment and the loss of historic buildings. Some comments stated that there is a need for more allotments. For St. Annes, limited natural green space and limited access to the countryside were raised as issues. A lack of open space was raised as an issue for Kirkham in the comments, including comments from the schools.

Infrastructure

Comments were made stating that the north-south transport links in the borough are poor. The infrequency of trains on the South Fylde railway line was raised as an issue, along with the lack of a direct link to Blackpool North station on this line. Comments were made stating that there is a lack of customer facilities at Kirkham and Wesham station, and it was also stated that buses from Kirkham and Wesham station to other key destinations are infrequent.

Lack of car parking was raised as an issue for many of the urban settlements, and for Lytham and St. Annes it was stated that this has contributed to the decline of the town centres. However, car parking is another example of an issue that the Core Strategy is unable to address. Traffic congestion was raised as an issue in relation to the A585, Warton and some of the rural villages.

Many comments were made stating that there is a lack of quality open space, sports, recreation and leisure facilities. Lack of access to reliable, high speed electronic communication was also raised as an issue.

Rural

Concerns were raised over the future of Whitehills, which raises the issue of the lack of coordination of development in this area. Many comments were received stating that the facilities and infrastructure of the rural villages are at capacity. Some people made the comment that there is a lack of regeneration in the rural villages.

The rural bus service was raised as an issue, with comments stating that buses are limited in their frequency and are limited in their destinations. Traffic congestion was raised as an issue in some of the rural villages.

Conclusion

The 'issues, vision and objectives' consultation was an extensive consultation which generated a large volume of comments.

Changes made to the issues in response to comments made during the consultation

Key Issues for the Fylde Core Strategy to address

This section highlights those issues which have been identified from an analysis of the evidence base. The issues are not listed in order of importance. Please read the issues for your settlement /area and also the Borough wide issues which are at the end of this section.

Issues – St Annes

- The need to provide the right type and number of new homes in St. Annes for current and future generations.
- The most acute lack of affordable housing in the Borough.
- ~~There is an oversupply of flats¹, including retirement flats.²~~
- ~~There is a lack of family housing.³~~
- ~~There are many empty homes.⁴~~
- A higher than average proportion of older people, with lower proportions of working age and young people.
- The ~~deficiency~~ of health and social facilities in St Annes - especially in view of the forecast increase in the proportion of older people.
- Small areas within St Annes fall within the most deprived 10% of areas in England in terms of crime, employment and income affecting older people and the living environment.
- A slightly lower proportion of people in 'good health' and a slightly higher proportion 'not in good health' compared to the rest of the Borough.
- ~~Drug and alcohol misuse is a problem.⁵~~
- Local employment opportunities are limited mainly to the service and tourism sector.
- ~~Need to attract tourism trade to the town centre, rather than just the promenade.⁶~~
- ~~Inadequate car parking in St. Annes town centre⁷ has contributed towards the decline of the town centre.⁸~~
- ~~A high concentration of takeaways⁹~~
- ~~The selection of supermarkets is limited¹⁰~~
- The seafront/promenade area requires considerable investment.

Deleted: This is in relation to national, regional and local figures. The proportion of elderly people is forecast to increase significantly.

Deleted: availability

Deleted: The vitality and viability of the town centre.

Appendix 2: Vision Issues and Objectives: Consultation Responses

- The main holiday area is contracting as tourism declines leaving areas on the edge which are suffering from a lack of investment.
- A lack of indoor attractions.
- A lack of recreational facilities for youths.¹¹
- Night time economy is limited.¹²
- Risk of tidal flooding.
- Variable bathing water quality.
- Lack of a direct quality route by road between St Annes and Blackpool Victoria Hospital¹³, the employment land at Whitehills Park and also the M55 motorway.
- Lack of capacity in the Waste Water system.
- Limited events/entertainment for people of all ages.
- Limited natural greenspace and limited access to the countryside.¹⁴

Deleted: for holiday makers and children

Deleted: <#>Lytham St Annes High School has reached its capacity and cannot be expanded.¶
¶
<#>Lack of capacity in Primary Schools¶
¶

Deleted: <#>Low frequency of rail service¶

Issues – Lytham

- The need to provide the right type and number of new homes in Lytham for current and future generations.
- The second most acute lack of affordable housing in the Borough after St Annes.
- A large number of empty properties.¹⁵
- A higher than average proportion of older people with lower proportions of young people and people of working age.
- The availability of health and social facilities in Lytham especially in view of the forecast increase in the proportion of older people.
- There is one pocket of deprivation in Lytham characterised by barriers to housing and services.
- Lytham has lost substantial amounts of local employment land at Dock Road as well as adjacent to the town centre. Both areas were in sustainable locations and provided employment for local residents.
- Inadequate car parking in Lytham town centre¹⁶ which has contributed to the decline of the town centre.¹⁷
- Lack of indoor attractions.¹⁸

Deleted: The vitality and viability of the town centre.

- [Fairhaven Lake needs restoration and regeneration.](#)¹⁹
- Risk from both tidal and river flooding.
- Lack of a direct quality route by road between Lytham and the employment land at Whitehills Park and the M55 motorway.
- Low frequency of train service.

Deleted: Lack of capacity in primary schools

Issues – Kirkham and Wesham

- The need to provide the right type and number of new homes in Kirkham/Wesham for current and future generations.
- There is a significant need for affordable housing.
- [There is a lack of family housing in Kirkham.](#)²⁰
- There are pockets of deprivation in terms of education skills and training, employment, health and disability, income, income affecting children, income affecting older people and living environment. This deprivation is not as severe as that in St Annes.
- Kirkham/Wesham and Freckleton/Warton have the highest proportion of people in the Borough with no qualifications.
- [The streetscene of Kirkham town centre is poor.](#) Kirkham's market town character has been eroded in recent years. The quality of shopfronts and signage needs to be addressed.
- Lack of park and ride facilities and disabled access at Kirkham and Wesham station.
- [Lack of customer facilities at Kirkham and Wesham station.](#)²¹
- [Bus service from Kirkham and Wesham to St. Annes and other key destinations is infrequent.](#)²²
- [A lack of open space.](#)²³
- [A lack of facilities for the elderly.](#)²⁴
- Land north and east of Kirkham is liable to flood (flood risk zone 3).

Deleted: Maintaining the vitality and viability of the town centre.

Deleted: In particular, improving its appearance.

Issues – Freckleton and Warton

- The need to provide the right type and number of new homes in Freckleton and Warton for current and future generations.

- ~~Freckleton and Warton are two²⁵ of the more affordable areas for housing in the Borough, although the need for affordable housing is still significant.~~
- There are a few pockets of deprivation in terms of barriers to housing and services, employment, income and income affecting children. Though the problems are not as severe as those in St Annes.
- There are problems with antisocial behaviour²⁶ and crime²⁷ in Warton.
- Perception of crime and fear of crime in Freckleton.²⁸
- Warton has a lack of provision of children's play areas.
- Warton would benefit from the provision of a village centre²⁹ and civic space.
- Traffic congestion in Warton at rush hour.³⁰
- Transport links to Freckleton and Warton are poor.³¹

Deleted: The

Deleted: settlement is relatively one

Issues – Rural Areas

- The need to provide the right type and number of new homes in the rural areas for current and future generations.
- Whitehills, which is a developed site in the countryside, is not being planned in a co-ordinated way.³²
- The provision of affordable housing is a significant issue throughout the rural areas.
- The use of static caravans as dwellings.
- Lack of diversity in the rural economy.
- Poor access to health and social facilities, especially in view of the forecast increase in the proportion of elderly people.
- The declining range of shops and services in the rural villages.
- Facilities and infrastructure of the rural villages are at capacity.³³
- A lack of provision of children's play areas and parks and gardens.
- A lack of regeneration and public realm improvement schemes³⁴
- Bus services are limited in their frequency and are limited as to where they go.³⁵
- Car ownership levels are higher than in the surrounding settlements. This may make it very difficult to increase the level of conventional bus services because of the low potential customer base.

- Rates of home working, are higher but those not working from home travel longer distances to work. Proportionately fewer cycle or walk to work.
- Some of the villages experience high volumes of traffic.³⁶

Deleted: <#>Traffic congestion and Heavy Goods Vehicles on the A585 between the M55 and Norcross.¶

Borough Wide Issues

General

- A higher than average proportion of older people, with lower proportions of working age and young people.³⁷

Housing

Deleted: There should be a presumption in favour of sustainable development

- The need to provide the right type and number of new homes for current and future generations.³⁸
- There is a very high need for affordable housing throughout the Borough.
- How many new homes are needed in total, what types of housing are needed.
- Location of new housing development to minimise the future risk of river and tidal flooding.
- The relative imbalance of the existing housing stock (and current planning permissions) which is characterised by high numbers of detached dwellings and flats and lower proportions of semi-detached and terraced houses compared to the North West Region as a whole.
- Some new housing developments lack a 'sense of place' and are of poor quality design with intensive layout.³⁹
- There are many empty homes in the borough.⁴⁰
- There is an oversupply of flats.⁴¹

Economy

- Relative lack of diversity in the local economy which has a particular dependence on the manufacturing sector.
- Lack of sustainable local employment⁴² along with the loss of large employers and the need to retain those that remain.⁴³
- Employment levels in the borough are falling.⁴⁴
- Lack of incentives for the start-up of local businesses.⁴⁵

- The tourism industry (apart from day visitors is in decline) is in decline. It has the potential to make a more significant contribution to the economy.
- [Loss of caravan pitches to residential development.](#)⁴⁶
- The loss of skilled young people from the area when they reach adulthood.
- The gap between jobs and skills including the lower paid_end of the job market.
- High level of [in](#)⁴⁷ and out commuting by the skilled workforce.
- [Lack of employment opportunities and apprenticeships for young people and graduates.](#)⁴⁸
- [Vitality and viability of town centres needs to be maintained and improved.](#)⁴⁹
- [Retail provision is limited in the town centres.](#)⁵⁰

Deleted: Need to plan for town centres such that their v

Deleted: is sustained

Environment

- How we adapt to and mitigation against the impacts of climate change. In particular the increased risk of flooding for Fylde.
- The potential loss / deterioration of important habitat.
- The potential loss /deterioration of the local landscape, coast and countryside.
- [Risk of existing settlements merging.](#)⁵¹
- Poor/ moderate river water quality.
- Protection of the best of the built environment and improvement of the quality of development.
- Increasing use of the private car.
- The capacity of the waste water system and the impact on beach water quality.
- The threat to farming/ farm land.
- [Shortage of allotments.](#)⁵²
- [Historic buildings are being demolished and the historic streetscene is being spoiled.](#)⁵³
- [Much of the borough is deficient in trees and woodland.](#)⁵⁴

Infrastructure

- Lack of school places to cope with future populations.
- Inadequate provision of public rights of way, bridleways and cycle routes.
- How to maximise the potential for people to walk and cycle more frequently as a means of transport on local trips.
- How to maximise access to bus services in both the urban and rural areas.
- Congestion on the main road routes leading to the M6.
- The North / South transport links in the borough are poor.⁵⁵
- There are traffic congestion issues on the A585, north from Junction 3 of the M55.⁵⁶
- The sustainable development of Blackpool Airport because of its importance for local employment and convenience for residents.
- How to maximise the potential of the rail system in Fylde.
- The trains on the South Fylde railway line are infrequent, and there is no direct link to Blackpool North station.⁵⁷
- The potential of the area to support sustainable renewable energy generation and low carbon energy generation.
- There is a lack of capacity in the wastewater system.
- The fear of crime and anti social behaviour although crime levels are low.
- Lack of quality open space, sports, recreation and leisure facilities which are accessible to all.⁵⁸
- Lack of access to reliable, high speed electronic communication.⁵⁹
- Lack of car parking in many of the urban settlements.⁶⁰

Cross Boundary Issues

That is the relationship between places in Fylde and places in its neighbouring authorities of Blackpool, Wyre and Preston.

- The provision of infrastructure is a cross boundary issue. In particular there are issues with the capacity of the waste water system.
- Blackpool Airport is situated in Fylde adjacent to the boundary with Blackpool and both authorities need to work together to maximise the potential for sustainable transport links and job creation related to the airport.
- The A585 takes Heavy Goods Vehicles and a substantial amount of other vehicular traffic north from junction 3 of the M55 through rural Fylde and on

into Wyre Borough and the ferry port of Fleetwood. Both Fylde and Wyre are interested in resolving issues relating to congestion on this route.

- [Fylde is a desirable place to live and work.](#)⁶¹

Endnotes

¹ [Source: Letters, Town Plan Household Survey – St. Annes; Comments: St. Annes does not need more high density flats. & Too many flats; Evidence: SHMA, Council's Housing section.](#)

² [Source: Community engagement events; Comments: Too many retirement flats; Evidence: SHMA, Council's Housing section.](#)

³ [Source: Community engagement events; Comments: Need family housing; Evidence: SHMA, Council's Housing section.](#)

⁴ [Source: Community engagement events; Comments: Too many empty flats; Evidence: Council's Housing section.](#)

⁵ [Source: Community engagement events; Comments: Drug and alcohol problem; Evidence: \(St. Annes or borough wide?\) Fylde Health Profile, LSP.](#)

⁶ [Source: Town Plan Business Survey – St. Annes; Comments: Need to attract tourism trade to the town centre, rather than just the promenade; Evidence: Council's Tourism Officer.](#)

⁷ [Source: St. Peter's RC Primary School Yr6 class, St. Bedes RC High School Yr8/9 Geography classes, Town Plan Business Survey – St. Annes, Town Plan Household Survey – St. Annes, Letters; Comments: Numerous comments were made on this issue; Evidence: Council's Parking Manager.](#)

⁸ [Source: Letters, Town Plan Business Survey – St. Annes; Comments: The decline of St Annes as a retail and service centre should be reversed by the provision of extensive free car parking. & The lack of car parking in St. Annes and other towns has caused the retail footfall to plummet and shops to close and move elsewhere. & Parking is a big issue for customers, who often can't or don't stop and shop for longer due to parking restrictions. & 27% of surveyed businesses identified car parking as a way to improve the chances of business success; Evidence: Council's Regeneration section.](#)

⁹ [Source: Community engagement events; Comments: Comment made specifically in relation to St Albans Road; Evidence: Site visit, obesity data.](#)

¹⁰ [Source: Community engagement events; Comments: Poor selection of supermarkets – existing fall into high price bracket; Evidence: Fylde Coast Retail Study.](#)

- ¹¹ **Source:** [Community engagement events, Town Plan Household Survey – St. Annes, Town Plan Student Survey – St Annes](#); **Comments:** [Lack of youth recreational facilities.](#) & [Better youth facilities.](#) & [Nothing for teenagers to do and lack of shops for teenagers.](#) & [No access to cinema](#); **Evidence:** [LSP.](#)
- ¹² **Source:** [Town Plan Household Survey – St. Annes and Town Plan Student Survey – St Annes](#); **Comments:** [Limited evening entertainment / nightlife.](#) & [Better evening and nightlife.](#) [Better selection of restaurants.](#) & [More of a wine bar / café culture.](#) & [No cinema](#); **Evidence:** [Council’s Regeneration section.](#)
- ¹³ **Source:** [Town Plan Student Survey – St. Annes](#); **Comments:** [No direct route to Victoria hospital](#); **Evidence:** [Public transport information.](#)
- ¹⁴ **Source:** [Letters](#); **Comments:** [St. Annes – there is a lack of natural greenspace and access and availability of countryside](#); **Evidence:** [Open Space, Sport and Recreation Assessment.](#)
- ¹⁵ **Source:** [Community engagement events](#); **Comments:** [Large number of empty properties](#); **Evidence:** [Council’s Housing section.](#)
- ¹⁶ **Source:** [Letters, Ansdell Primary School, St. Peter’s RC Primary School, St. Bedes RC High School Yr8/9 Geography classes](#); **Comments:** [The lack of car parking in St. Annes and other towns has caused the retail footfall to plummet and shops to close and move elsewhere.](#) & [Not enough car parking](#); **Evidence:** [Council’s Parking Manager.](#)
- ¹⁷ **Source:** [Letters](#); **Comments:** [The lack of car parking in St. Annes and other towns has caused the retail footfall to plummet and shops to close and move elsewhere.](#) & [If we want to help our town centres then we must remove punitive car parking charges](#); **Evidence:** [Council’s Regeneration section.](#)
- ¹⁸ **Source:** [Community engagement events](#); **Comments:** [Need indoor attractions and facilities for children and teenagers](#); **Evidence:** [LSP.](#)
- ¹⁹ **Source:** [Community engagement events](#); **Comments:** [Develop Fairhaven](#); **Evidence:** [Council’s Regeneration section.](#)
- ²⁰ **Source:** [Community engagement events](#); **Comments:** [Family housing is required in Kirkham](#); **Evidence:** [Council’s Regeneration section.](#)
- ²¹ **Source:** [Community engagement events](#); **Comments:** [No car parking available at Kirkham station.](#) & [Need to improve station to attract visitors - no facilities or toilets.](#) & [Lack of parking facilities at Kirkham and Wesham train station - need park and ride facilities](#); **Evidence:** [National Rail Enquiries.](#)
- ²² **Source:** [Community engagement events, St. Bedes RC High School Yr 8 Geography class](#); **Comments:** [Improved access to public transport throughout the Borough to key destinations e.g. St Annes hospital.](#) & [Need more frequent buses to Lytham from Kirkham](#); **Evidence:** [Public transport information.](#)
- ²³ **Source:** [Community engagement events, St. Bedes RC High School Yr 8 Geography class](#); **Comments:** [Kirkham has less than half the open space it should have for the size of the settlement \(re. national standards\).](#) & [More parks for](#)

Responses to “Regulation 25” letter

Summary of the issues raised by statutory consultees during the consultation

CPRE – Fylde District

- Brownfield land should be developed before greenfield land.
- Potentially redundant brownfield employment sites should be re-used for housing, subject to an up-to-date assessment of the need and demand for employment sites in the borough.
- The loss of greenfield sites for a new sustainable settlement around J4 of the M55 is preferred rather than the loss of rural countryside and farmland and over development of rural communities.
- Should be no need to change settlement boundaries if sites within settlements together with the proposed new settlement at J4 can satisfy the Borough’s housing and employment needs.
- New housing should be focused within settlements rather than creating urban sprawl/ribbon development outside settlements.
- The Council should adopt a policy and strategy to bring empty homes back into use. Conversion of commercial non-residential buildings into homes, including flats over shops, should be encouraged.
- The Council should adopt local policies and a strategy for farming, agricultural land and local food in the Borough.
- Need to recognise and support the responsibility farmers have in caring for the countryside by maintaining landscape character, water and soil quality and wildlife habitats.
- Need to recognise and support the contribution of the Borough’s farmers to UK food security.
- Development that would involve permanent loss of the best and most versatile agricultural land should be prevented.
- Arable farmland that is currently productive or has potential to be productive, particularly on urban fringes, should be protected from development.
- New developments should not be located or designed in such a way as to create unnecessary conflict with farming operations.
- The Council should promote a local food network, thus helping to maintain thriving local businesses, and support for farming and demand for local food.
- In principle, anaerobic digester power plants in Fylde are acceptable provided there is they can be fully supplied from local crops resulting in low 'energy miles', and that HGV access on rural roads is minimised.
- The sand dunes at Lytham St Annes should be managed in accordance with an approved Management Plan to protect ecology and reduce flood breach risk.
- Policies must protect designated ecological sites, i.e. SSSIs and County Biological Heritage Sites.

- All ecological sites should be managed in accordance with an approved Management Plan.
- Potential disturbance to a designated site by any development should be avoided.
- Any proposal for an individual wind turbine or a wind farm must be subject to Environmental Impact Assessment to ensure protection of landscape character, tranquillity, including audible impact, and cumulative visual impact.
- Provision of affordable homes should be maximised as part of every new housing development.
- In rural settlements, affordable homes should only be provided to meet identified local needs.
- Greenfield rural exception sites may be allowed as extensions to rural settlements only if they provide 100% affordable housing to meet identified local needs.
- Supports re-opening of the Poulton to Fleetwood rail line, to reduce dependence on cars and provide more travel choices.
- Fylde Coast Easterly Bypass - rail improvements and traffic management improvements should be considered before any new route is adopted which would take significant agricultural land and impact on the countryside.

Highways Agency

- There are traffic congestion issues on the A585 (T), north from jct 3 of the M55, and the Highways Agency have been closely involved in previous studies looking at the different options e.g. Blue Route.
- There is a need for continuing partnership working with regard to issues on the A585.

Health and Safety Executive

- Need to be mindful of the consultation zones that have been set around hazardous installations when planning developments in the borough.

English Heritage

- Look at PPS5, policy HE3, when developing an approach to managing historic environment / heritage assets. When developing this approach, must have a sound understanding of the historic environment / heritage assets and the character of Fylde, and also the challenges facing its conservation and enhancement.
- The issues don't address the conservation, enhancement and enjoyment of the historic environment and its heritage assets.
- A Core Strategy policy for the historic environment should set out: How the historic aspects of the environment that contribute to the distinctiveness of an area will be safeguarded or enhanced; how the threats to historic assets in the area, including their settings will be managed; how the historic environment will be used to assist in the delivery of other spatial objectives; and how the evidence base for the historic environment links to the Core Strategy policy e.g. Conservation Area Appraisals.
- Ryedale's Draft Core Strategy 2010 is an example of a particularly comprehensive policy for the historic environment.

Entec UK Ltd, on behalf of National Grid

- National Grid's high voltage electricity overhead transmission lines / underground cables within Fylde that form an essential part of the electricity transmission network includes the VF line – 400kV route from Stanah substation in Wyre District to Penwortham substation in South Ribble.
- National Grid has the following gas transmission assets located within Fylde: Lupton to Bretherton; and Treales to Burscough.

The Coal Authority

- No specific comments to make at this stage.

Natural England

- Wide range of environmental issues have been acknowledged.
- Rural area section, need specific mention to the need to preserve and enhance the distinctive landscapes and natural environments of the Fylde countryside.

Blackpool Council

- Blackpool Council welcomes the opportunity to liaise and work with Fylde Borough Council on developing a close working relationship on key spatial planning issues across the Fylde Coast Sub-Region.
- The main focus for Blackpool Council comments is on cross-boundary issues. Issues identified relating to infrastructure, transport and traffic issues are supported by Blackpool Council.
- A main omission in Blackpool Council's view is the lack of any mention of the merits or otherwise of further housing growth on the edge of Blackpool. Following the work commissioned by Blackpool and Fylde Councils on "the M55 Hub" specifically to inform the proposals of the respective Blackpool and Fylde Core Strategies, and following the concerns raised on this issue in Fylde Borough Council's own response to public consultation on the Blackpool Core Strategy, the lack of identification of potential cross-boundary development as an issue is seen as a significant anomaly.

Lancashire County Council, Planning Policy

- Need to recognise that outward commuting should be recognised as a helpful contribution to the Fylde economy.
- The text should recognise the significant in-commuting to the authority and that the challenge is how best to provide sustainable forms of travel particularly to Preston.
- The inclusion of infrastructure as a cross-boundary issue is welcomed.
- As the plan develops, need to consider the proposals set out in Blackpool's submission Core Strategy to develop land at Marton Moss, and the implications that this may have on the infrastructure requirements within Fylde.
- Health considerations should be seen in their broadest sense within the document rather than being only concerned with sickness.
- To ensure that health and wellbeing is considered throughout the process it is suggested that a Health Impact Assessment screening is completed on future strategy documents as they are produced.
- Central Lancs have carried out a Health Impact Assessment screening as part of their Core Strategy. This work was led by Iain Pearson ipearson@southribble.gov.uk, 01772 625229.

- Clare Platt has been involved in previous Health Impact Assessments at the Council and may be an appropriate contact within the Council on this issue.

Preston City Council

- Supports the strategic direction for Fylde as set out in the issues.
- Cross boundary wastewater capacity issues have been identified.
- The economic links between Fylde and Preston / Central Lancashire has been identified.

Regarding wastewater, a water cycle study for Central Lancashire is underway, and this should look at the cross-boundary infrastructure issues. Contact Mike Molyneux for further details (m.molyneux@preston.gov.uk).

- Cross boundary economic links are important – the major employers (like BAe) in Fylde area are a source of skilled and well-paid jobs for Preston / Central Lancashire residents. The 2001 travel to work data showed twice as much commuting into the Fylde from Central Lancs than from the Fylde into Central. This has implications in terms of sustainability and transport infrastructure.

South Ribble Borough Council

- In terms of Borough Wide Issues and Settlement Based Issues, infrastructure is crucial, which includes transport and social infrastructure.
- Would it be helpful to refer to overcoming existing traffic congestion from Fylde into Preston and vice versa at peak times?
- Is there no provision or need for extensions at existing doctors surgeries and / or dental practices, or a need for new surgeries and practices in Fylde? South Ribble, are actively engaged with colleagues from Central Lancashire NHS about their capital investment programme for healthy facilities and doctors surgeries.

Kirkham Town Council

- The town council will not accept any development on open countryside or greenfield sites in and around Kirkham.
- Use and promote brownfield sites within existing town boundaries to ensure a steady supply of affordable and other housing for local people, and to protect quality of life.
- Kirkham – town centre viability and vitality is addressed by the Kirkham and Wesham Business Group, and have worked with the Council to complete several regeneration projects. This support is essential to ensure there is growth within the town centre.
- Kirkham would benefit from a higher profile in any marketing material the Council produce.
- Kirkham issues should be addressed separately from Wesham to give a clear picture for discussion. This should also apply to Lytham and St. Annes.
- Welcome input into the tourist trade. However, tourists do not come to an area to visit 500-1000 strong housing developments but the unique quality of the market towns, villages and countryside that make up rural Fylde.

Westby-with-Plumpton Parish Council

- Westby - must seriously consider the matter of urban sprawl into what is a rural area of considerable natural beauty.

- Blackpool and the surrounding area have geographical limitations on areas where development could take place. Concerned that the only option would be to encroach into Westby. Therefore suggest that the Council look very carefully at which land is to be ear-marked for future development.
- Westby Parish Council would appreciate guidelines on policy regarding whether the Borough Council going continue to allow rural communities to be developed.
- With so many empty properties in the Westby area, why the need for extra development of residential units?
- Does the Council have figures on housing requirements to substantiate future development?
- The Council must not adopt a hasty approach to producing a housing requirement figure.

Representation Responses

Core Strategy Regulation 25



OC/AGCN/08/00195

NJL Consulting

- 1 Urge Council to proceed promptly in accordance with latest Government guidance and to bring forward options for future development to inform the site allocations Development Plan Document (DPD).
- 2 The advisory draft National Planning Policy Framework (NPPF) reiterates the Government's commitment to a plan-led system but that where local planning policies are out of date then there will be a presumption in favour of sustainable development except where it would cause significant harm to the objectives, principles and policies set out in this advisory NPPF.
- 3 Core Strategy policies should conform to current national policy guidance and standards. Do not introduce local requirements which affect viability and deter potential investments.
- 4 Support the inclusion of a defined settlement hierarchy, this should identify and define key areas for growth where housing and employment can be co-located and supported through existing community infrastructure with opportunity for new development to improve and enhance infrastructure.

This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.

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This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.

Seek change

The Council seeks inclusion of the following themes within the text of the emerging Fylde Core Strategy:
Infrastructure planning, developer contributions, climate change, energy efficiency in new buildings and green infrastructure.

Core Strategy Regulation 25

5	Kirkham should be a higher or 'tier one' settlement and key service centre and that this location should be indentified for future housing and employment growth.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
6	To accommodate growth, the Core Strategy should identify areas of countryside where new development should be located and criteria for selecting appropriate countryside include: Proximity to existing settlements and community infrastructure; Environmental designations including flood risk; Accessibility to public transport; Contributing to vitality and viability of existing town centres.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
7	The over-arching objective for the Core Strategy should be to significantly increase the delivery of new homes. The Council should be clear on their proposed housing targets and ensuring the ability to deliver a five year housing land supply.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
8	Identify key sites which are essential to the delivery of the housing strategy and for meeting the aims and objectives of the Core Strategy.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
9	Be clear on the expected affordable housing requirement for new housing but also identify options for flexibility in delivery.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
10	Set out expected developer contributions and indicate how the Council intend to implement the Community Infrastructure Levy and / or reference to the Infrastructure Plan.	The consultee suggests that expected developer contributions and reference to an infrastructure plan are included within the content of the Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of expected developer contributions and reference to an infrastructure plan within the content of the emerging Core Strategy.
11	Should not indicate a preference for phasing of housing delivery. Brown and Green field should be brought forward in parallel to achieve the overall vision for the Core Strategy and deliver sustainable development.	This comment relates to an issue that will be covered as part of the ongoing progression of the Fylde Core Strategy.	

Core Strategy Regulation 25

12	Support Climate Change in the Core Strategy. Should take a wider, strategic approach in terms of policy and not to impose restrictive building standards where these are not required under Building Regulations or legislation.	The consultee suggests that climate change should be included as a theme within the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of climate change as a theme within the content of the emerging Core Strategy.
13	Energy efficiency standards in new homes and buildings will be progressively tightened within the lifetime of the Core Strategy. Future changes not formally mapped out or agreed at the point in time.	The consultee suggests that energy efficiency within new buildings should be dealt with as a theme in the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of energy efficiency in new buildings as a theme within the content of the emerging Core Strategy.
14	Council should consider more progressive policies in relation to climate change, e.g. strategic green infrastructure network, encouraging alternative energy generation in buildings with high energy demands and strategies for improving the energy efficiency of existing homes and buildings.	The consultee suggests that strategic green infrastructure networks should be included as a theme within the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of green infrastructure as a theme within the content of the emerging Core Strategy.
15	Support Infrastructure Plan in the Core Strategy. This should specifically set out the planned and expected infrastructure improvements over the lifetime of the Core Strategy in order to meet the planned growth.	The consultee suggests that an Infrastructure Plan should be included within the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of an Infrastructure Plan within the content of the emerging Core Strategy.

OC/AGCN/08/00321

Planning Bureau Ltd**Councils Response****Seek change**

1	McCarthy and Stone Retirement Lifestyles Ltd are concerned with the lack of policy emphasis within the emerging Core Strategy relating to the provision of specialised accommodation for the elderly given the UK's and more specifically Fylde Borough's ageing population.	The consultee suggests that planning for specialised accommodation for the elderly is dealt with as a separate theme within the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of planning for specialised accommodation for the elderly as a separate theme within the emerging Core Strategy.
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Core Strategy Regulation 25

2 Concerned with the wording of Objective 1 (of the recently published Issues and Options Paper). McCarthy and Stone do not object to the promotion of more family housing. Object to the statement wording to not promote flatted developments for the elderly retired population, due to the percentage of elderly population in the area. This position is contrary to the evidence base for the LDF. Promotion of owner occupied retirement housing releases housing stock for families and is a more efficient use of resources.

The consultee suggests that planning for specialised accommodation for the elderly is dealt with as a separate theme within the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of planning for specialised accommodation for the elderly within the emerging Core Strategy.

3 Suggest that a subsequent policy option be introduced that positively supports the delivery of specialised accommodation for older people including sheltered housing. McCarthy and Stone would like to see a policy worded along the following lines:
'Development proposals for accommodation designed specifically for the elderly will be permitted provided that they are accessible by public transport or a reasonable walk to community facilities such as shops, medical services, places of worship and public open space.'

The consultee suggests that planning for specialised accommodation for the elderly should be included as a theme within the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of planning for specialised accommodation for the elderly within the emerging Core Strategy.

SCB/SCB/08/00343

**Natural England Government Team
South**

Councils Response

Seek change

Core Strategy Regulation 25

- | | | | |
|---|--|---|---|
| 1 | <p>We note the following statements that the Core Strategy will include, namely:
'(i) the development and use of land which the Council wish to encourage during lifetime of the Strategy; (ii) objectives relating to design and access which the Council wish to encourage; (iii) any environmental, social and economic objectives which are relevant to the attainment of the development and use of land as mentioned in paragraph (i); and (iv) the Council's general policies in respect of the matters referred to in paragraphs (i) to (iii).'</p> <p>We concur with the list of themes in so far as most of them cover matters that relate to our environmental interests.</p> | <p>The consultee agrees with the list of themes set out in the Regulation 25 consultation.</p> | |
| 2 | <p>Green infrastructure, recreation and access to green spaces have not been included and ask they be included in the themes taken forward.</p> | <p>The consultee suggests that green infrastructure, recreation and access to green spaces be included as a theme within the emerging Core Strategy. The Council accepts this suggestion.</p> | <p>The Council seeks the inclusion of green infrastructure, recreation and access to green spaces within the content of the emerging Core Strategy.</p> |
| 3 | <p>PPS12, paragraph 4.1, advises on the content of a Core Strategy</p> | <p>Noted.</p> | |
| 4 | <p>Sustainability Appraisal (SA)/ Strategic Environmental Assessment (SEA) Scoping Report Scoping Report for the Sustainability Appraisal of the Local Development Framework was produced in 2006 and we responded to a consultation on this report in our letter dated 18th December 2006. The copy of the SA Scoping Report on your web site is the 2006 version. In our opinion, this report will need to be updated to make it fit for purpose for the emerging Core Strategy. It will of course be a need to incorporate the requirements of Strategic Environmental Assessment too.</p> | <p>The consultee has raised an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p> | |

Core Strategy Regulation 25

- | | | |
|---|--|---|
| 5 | <p>Habitats Regulations Assessment (HRA)
 HRA screening of Core Strategy is required to determine whether Appropriate Assessment is required. Screening should cover European sites within the boundaries of Fylde Borough (e.g. Ribble & Alt Estuaries SPA/Ramsar, Morecambe Bay SPA/Ramsar) and consider possible effects beyond. It should consider potential impacts of this plan and any cumulative or in-combination effects when taking account of other plans and projects, including those in relevant authorities beyond the borough boundary. Suggest HRA process runs in parallel to the development of the Core Strategy. If initiated from the outset, its findings from earlier stages can be used to inform subsequent stages, e.g. preferred options.</p> | <p>The consultee has raised an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p> |
|---|--|---|

SCB/SCB/08/00344

The Coal Authority

- | | | |
|---|------------|-----|
| 1 | No comment | N/A |
|---|------------|-----|

Councils Response

Seek change

SCB/SCB/08/00354

The Wildlife Trust for Lancashire

- | | | |
|---|--|-----------------|
| 1 | <p>Natural Environment White Paper, specifically guidance for Local Authorities at http://archive.defra.gov.uk/environment/natural/documents/newp-summary-la-110607.pdf</p> | Comments noted. |
| 2 | PPS9 guidance | Comment noted. |

Councils Response

Seek change

Core Strategy Regulation 25

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|---|--|--|--|
| 3 | Green Infrastructure & Ecosystem Services | The consultee suggests that green infrastructure be included as a theme within the Core Strategy. The Council accepts the suggestion. | The Council seeks the inclusion of green infrastructure within the content of the emerging Core Strategy. |
| 4 | Given Fylde's coastal location, Coastal Zone Management Policies that will accord with the forthcoming Marine Spatial Plan for the waters off North West England | The consultee suggests that coastal zone management should be included within the themes for the Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of coastal zone management within the content of the emerging Core Strategy. |

SCB/SCB/08/00363**Councils Response****Seek change****CPRE - Fylde District**

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|---|---|--|--|
| 1 | The Council should encourage a local food network thus helping to maintain thriving local businesses, and support for farming and demand for local food that comes from the Borough's countryside. | The consultee suggests that local food production should be included as a theme within the emerging Core Strategy. The Council agrees with the suggestion. | The Council seeks the inclusion of local food production within the content of the emerging Core Strategy. |
| 2 | Energy farming supports farming operations and a demand for arable farmland, including lower grade agricultural land. Therefore in principle on-farm anaerobic digester power plants in the Fylde are acceptable provided there is evidence that they can be fully supplied from local crops resulting in low 'energy miles', and that HGV access on rural roads is minimised.

Anaerobic digester power plants that do not meet these criteria should not be permitted in countryside areas but restricted to commercial/industrial areas having good transport links. | The consultee raises issues relating to on-farm anaerobic digester power plants. These issues will be dealt with as part of the ongoing production of the Core Strategy. | |
| 3 | Any proposal for an individual turbine a wind farm or a solar panel farm in a countryside area must be subject to Environmental Impact Assessment to ensure protection of landscape character, tranquillity, including audible impact, and cumulative visual impact. | The consultee raises issues relating to individual wind turbines and wind or solar panel farms. The Council accepts that renewable energy should be included as a theme within the emerging Core Strategy. | The Council seeks the inclusion of renewable energy as a theme within the emerging Core Strategy. |

Core Strategy Regulation 25

4	In developed areas and built environments approval of wind turbines should be subject to restrictions to protect surrounding properties from unreasonable audible and visual impact.	The consultee raises issues relating to individual wind turbines and wind or solar panel farms. The Council accepts that renewable energy should be included as a theme within the emerging Core Strategy.	The Council seeks the inclusion of renewable energy within the content of the emerging Core Strategy.
5	Core Strategy should recognise sand dunes act as important and cost effective flood defence. also important for nature conservation habitat. Manage Lytham St Annes sand dunes in accordance with approved Management Plan. Coastal sand dunes should be maintained to actively encourage natural development of good soft sea defences.	The consultee suggests that sand dune management should be included in the content of the Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of sand dune management within the content of the emerging Core Strategy.
6	Policies must protect designated ecological sites, e.g. SSSIs and County Biological Heritage Sites. All sites should be managed in accordance with an approved Management Plan. Potential disturbance to a designated site by any development should be avoided.	The consultee raises an issue relating to SSSIs and Biological Heritage Sites. These will be addressed as part of the biodiversity theme within the emerging Core Strategy.	
7	FBC should adhere strictly to existing Local Plan policy, limiting development in countryside areas to those identified as acceptable Greenfield rural exceptions. (As set out in the FBC Local Plan).	The consultee raises issues relating to the countryside. They will be dealt with as part of the countryside theme within the emerging Core Strategy.	
8	Brownfield before Greenfield To ensure the most efficient use of land, priority must be given to re-using previously developed Brownfield land before Greenfield land, i.e. the 'sequential approach' to land use planning.	The consultee raises an issue relating to the sequential approach to new development. It will be dealt with as part of the housing and employment themes within the emerging Core Strategy.	
9	Redundant Brownfield employment sites should be re-used for housing subject to an up-to-date assessment of the need and demand for employment sites in the Borough.	The consultee raises an issue relating to the re-use of redundant Brownfield employment sites for housing. This will be dealt with as part of the housing and employment themes within the emerging Core Strategy.	

Core Strategy Regulation 25

10	New housing should be focused within settlements using previously developed land rather than creating urban sprawl/ribbon development outside settlements.	The consultee raises an issue relating to new housing. This will be dealt with as part of the housing theme within the emerging Core Strategy.	
11	FBC should adopt a policy and strategy to bring empty homes back into use.	The consultee raises an issue relating to new housing. This will be dealt with as part of the housing theme within the emerging Core Strategy.	
12	Conversion of commercial non-residential buildings into homes, including flats over shops, should be encouraged.	The consultee raises an issue relating to new housing. This will be dealt with as part of the housing theme within the emerging Core Strategy.	
13	Provision of affordable homes should be maximised as part of every new housing development within mixed housing developments.	The consultee raises an issue relating to new housing. This will be dealt with as part of the housing theme within the emerging Core Strategy.	
14	In rural settlements, affordable homes should only be provided to meet identified local needs. Greenfield rural exception sites may be allowed as extensions to rural settlements only if they provide 100% affordable housing to meet identified local needs.	The consultee raises an issue relating to new housing. This will be dealt with as part of the housing theme within the emerging Core Strategy.	
15	Over and above the protection afforded to countryside areas, areas of open coastline should in addition be protected from developments that would detract from their open character.	The consultee raises an issue relating to the coast. The Council accepts that the coast should be included as a theme within the emerging Core Strategy.	The Council seeks the inclusion of the coast as a theme within the emerging Core Strategy.
16	Guidance contained in PPS 25: Development and Flooding, or its replacement, should be strictly adhered to. All engineered flood defence systems should be maintained and improved to develop a robust system capable of withstanding 100 year flood water return levels or better.	The consultee raises an issue relating to flooding. The Council accepts that flood risk should be included within the emerging Core Strategy.	The Council seeks the inclusion of flood risk within the content of the emerging Core Strategy.

Core Strategy Regulation 25

17	<p>Only developments necessary for the maintenance of coastal infrastructure and that needed for maintenance of existing developments in areas along the coast that are at risk of flooding should be permitted.</p> <p>Coastal sand dunes should be maintained to actively encourage natural development of good soft sea defences.</p>	<p>The consultee raises issues relating to flood risk and dune management. The Council accepts that flood risk and dune management should be included within the content of the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of flood risk and dune management within the content of the emerging Core Strategy.</p>
18	<p>Only developments needed for the maintenance of existing developments and new developments provided with adequate defence against flooding using passive defence systems should be permitted in areas at risk from fluvial flooding.</p>	<p>The consultee raises an issue relating to flooding. The Council accepts that flood risk should be included within the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of flood risk within the emerging Core Strategy.</p>
19	<p>The water table of the Borough's agricultural land should be maintained low enough so as not to impede farming operations.</p>	<p>The consultee raises an issue relating to flooding. The Council accepts that flood risk should be included within the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of flood risk within the content of the emerging Core Strategy.</p>
20	<p>To reduce dependence on cars and provide more travel choices the Core Strategy should support re-opening of the Poulton to Fleetwood rail line, for example to relieve congestion on the A585T within the Borough.</p>	<p>The consultee raises an issue relating to transport and congestion. The Council accepts that transport should be included within the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
21	<p>Rail improvements and traffic management improvements should be considered before any new route is adopted which would take significant agricultural land and impact on the countryside.</p>	<p>The consultee raises an issue relating to transport. The Council accepts that transport should be included within the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
22	<p>Through a specific topic, the Core Strategy should acknowledge that after housing, the biggest use of land in the Borough is for agriculture Farming is a significant employment sector</p>	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the emerging Core Strategy.</p>	

Core Strategy Regulation 25

23	FBC should adopt local policies and a strategy for farming, agricultural land and local food in the Borough. Local policies and strategy should recognise and support the major responsibility the Borough's farmers have in caring for the Borough's countryside by maintaining landscape character, water and soil quality and wildlife habitats. Local policies and strategies should recognise and support the contribution of the Borough's farmers to UK food security.	The consultee raises an issue relating to local food production and food security. The Council accepts that transport should be included within the emerging Core Strategy.	The Council seeks the inclusion of local food production within the content of the emerging Core Strategy.
24	Development that would involve permanent loss of the best and most versatile agricultural land should be prevented. Arable farmland that is currently productive or has potential to be productive, particularly on urban fringes, should be protected from development.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the emerging Core Strategy.	
25	New developments should not be located or designed in such a way as to create unnecessary conflict with farming operations.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the emerging Core Strategy.	

SCB/LA/08/00390**South Ribble Borough Council**

		<u>Councils Response</u>	<u>Seek change</u>
1	We support the subjects, topics or themes that Fylde Borough Council is proposing to cover in the Core Strategy, apart from Minerals and Waste, which are covered in the Lancashire Minerals and Waste Development Framework (prepared jointly by LCC and the Minerals/Waste Planning Authority, in association with Blackpool Council and Blackburn with Darwin Council).	The consultee makes the point that minerals and waste are covered by the Lancashire Minerals and Waste Development Framework and should not be included within the content of the Fylde Core Strategy. The Council agrees with this point.	The Council seeks the deletion of minerals and waste from the list of topics to be included within the content of the Fylde Core Strategy.
2	The list of subjects, topics or themes also needs to include Health and Wellbeing and Achieving Good Design in the Built Environment. The Settlement Hierarchy and Transport sections will also need to take account of "Travel to work Areas" and traffic congestion in and out of Preston (to and from the Fylde) on a daily basis.	The consultee suggests the inclusion of health and wellbeing, good design within the built environment and traffic congestion and travel to work issues within the content of the emerging Core Strategy. The Council agrees that these topics should be included within the Core Strategy.	The Council seeks the inclusion of health and wellbeing, good design within the built environment and traffic congestion and travel to work issues within the content of the emerging Core Strategy.

Core Strategy Regulation 25

SCB/LA/08/00396

Lancashire County Council, Property Group

- 1 Given that "countryside" and "rural" are listed something which mentions the coastal area may be appropriate.
- 2 S106's/ CIL, in particular LCC infrastructure and services

Councils Response

The consultee suggests that coastal issues should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The consultee suggests the inclusion of infrastructure and developer contributions within the content of the emerging Core Strategy. The Council accepts this suggestion.

Seek change

The Council seeks the inclusion of coastal issues within the content of the emerging Core Strategy.

The Council seeks the inclusion of infrastructure and developer contributions within the content of the emerging Core Strategy

SCB/PC/08/00414

Ribby with Wrea Green Parish

- 1 Agree with the intensive list of subjects, topics and themes listed. However, this Council considers it would be appropriate, in view of the importance in the borough, that TOURISM was also included/ added.

Councils Response

The consultee suggests that tourism should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

Seek change

The Council seeks the inclusion of tourism within the content of the emerging Core Strategy.

GCB/VB/08/00500

The Theatres Trust

- 1 Support section on culture as unfortunately the provision of cultural services is not a statutory duty for local authorities. Protection and enhancement of existing facilities should be a key issue for future strategy as limited access to cultural opportunities is one of the barriers to broadening cultural experiences and the enhancement of people's quality of life.

Councils Response

The consultee suggests that culture should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

Seek change

The Council seeks the inclusion of culture within the content of the emerging Core Strategy.

Core Strategy Regulation 25

- 2 Infrastructure Plan section should identify and support all existing and proposed social infrastructure, such as your cultural facilities. Take a positive approach for new and enhanced infrastructure, especially where this created option for a variety of uses and reduce the need to travel.

Improvements and new provisions should be encouraged at suitable locations and resist loss of social infrastructure (e.g. pubs, post offices, theatres, community halls, youth centres, parks and open space) unless demonstrated facility is no longer needed or services provided at alternative location that is equally accessible by the community.

The consultee suggests that infrastructure planning, particularly social and cultural infrastructure improvements, should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of infrastructure planning within the content of the emerging Core Strategy.

OC/IB/08/00603

Mr

Simone

- 1 Recently, central government committed to reviewing planning policy in relation to biodiversity in the light of recent evidence showing the economic and well-being importance of biodiversity. I trust that any local policy definition will take on-board this intent or emerging policy should the central government policy review not be fully completed.

- 2 Recommend Fylde to adopt and strengthens the RSS policy EM1 which seeks to see a step-change increase in biodiversity (i.e. adopt the policy but drop the clause 'wherever possible').

Give priority to sites or applications which don't just mitigate losses of biodiversity, but can demonstrate a clear significant increase in biodiversity which should be linked to a biodiversity improvement strategy within the Core Strategy.

Councils Response

The consultee raises issues that will be dealt with as part of the process of producing the Fylde Core Strategy.

Seek change

Core Strategy Regulation 25

- 3 Yet to see any significant application deliver on its mitigation mandate over a period of time. Mitigation is not enforced or it fails over time and is not maintained. Every time mitigation is attempted to ensure 'no net loss', a huge risk is taken with the existing biodiversity assets. It is not surprising that despite planning policy, biodiversity losses continue apace.

- 4 Policy should define priorities for sites and applications:
 Highest priority to sites where this is little existing biodiversity interest and greatest opportunity to increase new biodiversity interest.
 Lowest priority to sites where significant existing biodiversity interests and therefore opportunities to increase are lower (and where change to existing represents the greatest risk)
 Do not develop high biodiversity interest sites whilst other site available. Any mitigation should be bonded with penalties attached and funds only released after a significant period (5, 10, 20 years) when the mitigation or improvement plan can be demonstrated to be successful.

OC/BC/08/00680

Row Bros Ltd

- 1 Review green belt boundaries to take on board those social and economic developments that have taken place and to meet those anticipated needs and expectation for the foreseeable future.

Councils Response

The consultee raises issues that will be dealt with as part of the ongoing process of producing the Fylde Core Strategy.

Seek change

OC/MISC/08/00812

Lancs Fire and Rescue Service

Councils Response

Seek change

Core Strategy Regulation 25

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|---|---|---|
| 1 | <p>Provided standard replies for Planning consultations, I would only add that on FBC weekly planning lists sent to the local Fire Safety officer that any High Voltage signs are specified as such, so they can be identified from any other illuminated signage.</p> | <p>The consultee raises issues that will be dealt with as part of the ongoing preparation of the Fylde Core Strategy.</p> |
| 2 | <p>Recommend the installation of domestic/residential sprinkler system(s) in the proposed premises.</p> | |
| 2 | <p>ACCESS FOR FIRE SERVICE VEHICLES
 1. Fire Service vehicle access to enable firefighting and rescue activities should be in accordance with Building Regulations 2000 Approved Document Part B, Section 17. Note for Guidance No 14 is attached for information purposes</p> <p>WATER SUPPLIES
 2. Water supplies should be in accordance with the Water Act 1945. No Residential property must be further than 150 metres from the nearest hydrant. All new hydrants must conform to British Standard 750.</p> | |

OC/TB/08/00863

**Network Rail, Town Planning Team
LNW**

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| 1 | <p>Please see Network Rail Route Utilisation Strategy - which the council should consider when formulating the core strategy.</p> | <p><u>Councils Response</u></p> <p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Fylde Core Strategy.</p> | <p><u>Seek change</u></p> |
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OC/AGCN/10/01033

CA Planning

Councils Response

Seek change

Core Strategy Regulation 25

1 The document should specifically refer to the substantial housing requirement in Fylde and the lack of truly sustainable locations for development. It should therefore also note that the Whyndyke Farm general location would be an appropriate location for a sustainable urban expansion.

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

OC/IB/10/01160

Councils Response

Seek change

Mr Chabba

1 Blackpool Borough Council has allocated housing development in the land between Yeadon Way and Progress Way, east of Midgeland Road. We are strongly in favour of these plans. Fylde Borough Council should come first to pave the way for development of this land, as this land is suitable for development, there are several houses within seventy yards of each other and this is not SP2 countryside. Fylde Brought Council, planning has already been granted around School Road.

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

OC/CLLR/11/00059

Councils Response

Seek change

Cllr Wood

1 It is important to remember that there are 'individuals' involved development and cost to FBC in delivering this facility/function.

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

2 Consideration of applicants costs and business

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

Core Strategy Regulation 25

3	<p>Consideration of cost of 'double-handling':</p> <ul style="list-style-type: none"> - lack of consistency of continuity between planning officers - offer a timeline target for addressing projects from start to finish - set expectations on potential costs for development, including 'consultations' with officers - streamlined 'objection' process and guidelines 	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>	
4	<p>There should be consideration of the heritage, character and landscape of the various areas within Fylde. This heritage must be considered and adhered to when developing in this area, to ensure we maintain the identity and unique character of the area. By identifying these kinds of factors for each area, we can offer guidelines for development.</p>	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>	
5	<p>Greenbelt should be sacrosanct and brown site utilised first.</p>	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>	
6	<p>Mineral mining and research must take consideration of the environment and peoples within it, with a clear understanding that safety is paramount and the area must be returned to how it was found.</p>	<p>The consultee raises an issue relating to mineral mining. Minerals and waste be will be dealt with as part of the Lancashire Minerals and Waste Development Framework, produced by Lancashire County Council in collaboration with Blackpool and Blackburn with Darwin Councils.</p>	
7	<p>Consideration should be given for 'incentivising' developments that consider waste, water saving and cost reducing energy sources.</p>	<p>The consultee suggests that reducing energy sources should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of energy saving within the content of the emerging Core Strategy.</p>
8	<p>Climate change is not something that can be solved within the Fylde alone. A practical and pragmatic approach to its consideration in development is vital. It cannot and should not be seen as another revenue raising opportunity.</p>	<p>The consultee raises an issue relating to climate change. The Council accepts that climate change should be included within the content of the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of climate change within the content of the emerging Core Strategy.</p>
9	<p>Flooding is a realistic possibility when building on flood-plains. FBC strategy should ensure developers are aware and plan accordingly but the ultimate decisions must be between the developer and the insurance companies.</p>	<p>The consultee suggests that flooding issues should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of flooding issues within the content of the emerging Core Strategy.</p>

Core Strategy Regulation 25

10	<p>Business areas and employment can be considered as part of a zoning review strategy.</p> <ul style="list-style-type: none"> - this will also have a potential impact on transport needs, for example; areas of Heyhouses or Lytham Park, maybe re-zoned for housing, with business zones developed up in Whitehills. - this approach can also allow for cheaper infrastructure cost in setting up a business 'community area' to attract high-tech industries. 	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>
11	<p>The framework should undergo a status review every 3-4 years to check on progress against targets and policies, as well as the operational costs against income for the strategy.</p>	<p>The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>

OC/CLLR/11/00107

Cllr

Andrews

Councils Response

Seek change

1	<p>The list of subjects you propose to be included in the Development Plan Document certainly appears to be comprehensive and I can think of no further areas.</p>	<p>The consultee accepts the list of topics proposed for inclusion in the emerging Core Strategy.</p>
2	<p>The following are particular concerns for rural villages:</p> <ul style="list-style-type: none"> - retain agricultural land for agricultural use and not development. - respect current settlement boundaries - retain countryside between settlements to ensure some form of community identify an hence ownership. - existing traffic levels must be taken into account when further development is allowed. 	<p>The consultee raises issues that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>

SCB/LA/11/00200

Horsley

Councils Response

Seek change

1	<p>A screening of the Core Strategy for Health Impacts would ensure that Health and Wellbeing is central to the planning process in Fylde.</p>	<p>The consultee suggests that health and wellbeing should be included as a topic within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of health and wellbeing within the content of the emerging Core Strategy.</p>
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Core Strategy Regulation 25

GCB/VB/11/00988

Home-Start Fylde

- | | | <u>Councils Response</u> | <u>Seek change</u> |
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| 1 | Settlement hierarchy: I'm not entirely sure what this means, but if it means encouraging a better mix of housing type and situating developments where there is less need to rely on private or public transport to access shops and facilities, then this is to be encouraged. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |
| 2 | Housing: The Fylde has a relatively low proportion of publicly owned social housing and opens the markets to private landlords who may not be concerned about the well-being of their tenants, but in any case is difficult to regulate.
_Private house building is towards the higher end of the market with retired often in mind, with developers taking full advantage of opt outs for providing facilities for younger families.
_Both of these circumstances lead to pressure on our client group/service users. The fact that we are thinking of a waiting list is evidence of a need for a service like Home Start, a need which is exacerbated by the patchiness of facilities, whether recreational or otherwise. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |
| 3 | Demographics: This is key. The Fylde has a high retirement population and none argues with the need to support the needs and aspirations of this group. This should not be at the expense of those, especially young family, who are often more vulnerable who move in for work without support networks. Its about balancing needs of different age groups, rather than preferring one over the others. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |

OC/AGCN/11/00990

DPP LLP

Councils ResponseSeek change

Appendix 2: Vision Issues and Objectives: Consultation Responses
Core Strategy Regulation 25

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| 1 | The Council should develop future Core Strategy policies to support sustainable economic growth in line with PPS4, and in light of the Government statement 'Planning for Sustainable Economic Growth' (dated 23 March 2011) which sets a strong presumption in favour of sustainable development and fostering economic growth and employment. | The consultee raises an issue that will be dealt with as part of the ongoing production of the Core Strategy. |
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SCB/LA/08/00401

Environment Directorate, Strategic Planning Team

- | | <u>Councils Response</u> | <u>Seek change</u> |
|---|---|---|
| 1 | Education needs should be considered as part of the wider infrastructure planning assessments, and should be based on the growth identified within the plan. As the Local Education Authority, the County Council is able to assist in assessing these needs. | The Council seeks the inclusion of infrastructure planning, including education, within the content of the emerging Core Strategy. |
| 2 | The role of skills and training has a significant role in the development of the local economy and should be considered within the plan. | The Council seeks the inclusion of skills and training within the content of the emerging Core Strategy. |
| 3 | Cross boundary issues - Fylde's position within the Fylde Coast, and partnerships such as the emerging Local Enterprise Partnership need to be considered. | The Council seeks the inclusion of cross boundary issues and Fylde's inclusion in the Lancashire Local Enterprise Partnership within the content of the emerging Core Strategy. |
| 4 | Gypsy/Travellers - Reference is made to Circular 01/06 (ODPM): Planning for Gypsy and Traveller Caravan Sites, and the responsibilities of local authorities to assess and make provision for the needs of gypsies and travellers. | The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy. |

Core Strategy Regulation 25

5	Health and Well Being - Health consideration should be considered within the plan and were included within the earlier consultation. More detailed comments are contained within our response to that consultation in our letter dated 22 March 2011.	The consultee suggests that health and wellbeing should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of health and wellbeing within the content of the emerging Core Strategy.
6	'Transport' theme is supported. County Council would be happy to provide more detailed comments on specific proposals at later stages of the process, and on the SHLAA when these are required.	The consultee suggests that transport issues should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of transport issues within the content of the emerging Core Strategy.
7	The Fylde Core Strategy should acknowledge the aims and objectives of the current Lancashire Local Transport Plan 2011-2021.	The consultee raises a transport related issue. The Council accepts that transport should be included within the content of the emerging Core Strategy.	The Council seeks the inclusion of transport within the content of the emerging Core Strategy.
8	Further to the Localism Bill and the potential repeal of the North West Regional Spatial Strategy, Fylde will be required to produce local standards for parking provision for new developments as part of their Local Plan. These standards should be included as part of the Core Strategy and be part of a car parking strategy. The provision of car parking and/or its relocation may influence pedestrian routes and desire lines into the town centres.	The consultee suggests that local parking standards should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.	The Council seeks the inclusion of local parking standards within the content of the emerging Core Strategy.
9	Air Quality Management Areas (AQMAs) - new development or transport strategies should consider any existing AQMAs (currently not applicable to Fylde) and should consider the impacts of development on air quality throughout the borough.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.	

Core Strategy Regulation 25

10	<p>Pedestrian and cycle networks that link residential areas to town centres bringing economic, health, social inclusion and accessibility benefits. Footpaths and cycle-ways should be on direct desire lines with consideration of user safety and perception of safety, maintenance and ownership. A pedestrian/cyclist signing strategy may be considered. Signs should also consider showing average walking times to local destinations as well as distances. Consider increasing the secure cycle parking at railway stations, employment centres and tourist destinations, especially where adjacent to existing cycle paths.</p>	<p>The consultee suggests that transport, particularly pedestrian and cycle networks, should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
11	<p>Rail - Northern Rail "Plus Bike", railway station based cycle hire initiative could also be considered within the Core Strategy as a way of promoting sustainable/active transport throughout the district.</p>	<p>The consultee suggests that transport, particularly cycle hire initiatives, should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
12	<p>It is recommended that reference is made to the LCC guidance document "Creating Civilised Streets" (2010) within the core Strategy.</p>	<p>The consultee refers to an issue relating to achieving good design within the built environment. The Council accepts that achieving good design should be included within the content of the emerging Core Strategy.</p>	<p>The Council seeks the inclusion of achieving good design within the content of the emerging Core Strategy.</p>
13	<p>The following highways schemes are planned within Fylde; funding of the schemes, however is dependent on developer contributions or other sources: M55 to Norcross blue route Hayhouses link road Fleetwood to St Annes Quality Bus Route</p>	<p>The consultee suggests that transport should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>

Core Strategy Regulation 25

14	<p data-bbox="257 162 504 199">New highway links.</p> <p data-bbox="257 231 862 438">External network - subject to the provision of qualifying and supporting information, any new infrastructure linking into the overall network would be expected to benefit the whole network, including sustainable movements (all modes) and have a positive effect on local amenity, not just to provide relief for new developments.</p> <p data-bbox="257 478 862 750">Internal network - new highways that are proposed within development sites should not be designed to direct traffic onto unsuitable routes or encourage rat-running by providing short cuts for through traffic. Internal layouts should be designed to fully support direct public transport services through the site maximising site accessibility whilst providing direct links for both pedestrians and cyclists within, through and external to the development.</p>	<p data-bbox="862 162 1624 255">The consultee suggests that transport should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p data-bbox="1624 162 2186 239">The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
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Core Strategy Regulation 25

15	<p data-bbox="257 161 862 191">Highways Guidance Documents</p> <p data-bbox="257 231 862 319">The following LCC and Dft documents may also provide some guidance for items that may be included within the Core Strategy:</p> <p data-bbox="257 359 862 678">"Transport Assessments - guidelines for Developer Support" (LCC, May 2011) - this document outlines the County Council's commitment to support sustainable and suitable new development and inward investment throughout the whole of the country. The promotion of the Developer Support principles, such as the encouragement of pre-application meetings with developers, may provide a useful indication of the support that future developers in the Borough can expect in relation to Highways issues.</p> <p data-bbox="257 686 862 774">LCC's 'Creating Civilised Streets' (2010). This provides local guidance on the design of residential roads for new developments.</p> <p data-bbox="257 782 862 893">"Manual for Streets (2007) and "Manual for Streets 2" (2010), both Dft publications, can be used for further guidance and best practice on new local road design.</p>	<p data-bbox="862 161 1601 255">The consultee suggests that transport should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p data-bbox="1601 161 2186 255">The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
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Core Strategy Regulation 25

16	<p>It should be noted that designs or bespoke treatments such as surfacing and street furniture requires the full agreement from LCC where these materials or changes form part of the highways infrastructure/network. The highway authority will take particular note (and will require satisfying where appropriate) of the following criteria; safety, design, standards, movements, fitness for purpose, implementation (and funding mechanism), future costs and responsibilities relating to maintenance, repair, replacement and the future availability of items/materials (security of supply).</p> <p>The County Council as the Highways Authority will need to be consulted at an early stage to agree materials, implementations, maintenance regimes etc. It is noted that a key funding source will be through developer contribution via s278 and s106 agreements.</p>	<p>The consultee suggests that transport should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of transport within the content of the emerging Core Strategy.</p>
<p>GCB/RG/08/00434</p>			
<p>Churches Together, Our Lady Star of the Sea</p>			
1	<p>Low cost housing</p>	<p>The consultee mentions an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.</p>	
<p>GCB/RG/08/00440</p>			
<p>St. Annes Parish Church</p>			
1	<p>The role of the church in community development, cohesion and enrichment</p>	<p>The consultee suggests that the role of the church in community development should be included within the content of the Core Strategy. The Council accepts that community development, including the role of places of worship, should be included.</p>	<p>The Council seeks the inclusion of community development, including the role of places of worship, within the content of the emerging Core Strategy.</p>

Core Strategy Regulation 25

OC/IB/08/00540

Councils Response

Seek change

Mr Perrington

1 No more housing development.

OC/IB/08/00544

Councils Response

Seek change

Mrs Pickup

1 Core Strategy should reflect the varied nature of the Fylde coast and ensure that no individual area is overlooked. Protect individual characteristics of all areas and preserve heritage. Must look 100 years ahead - think of the Victorian and Edwardian legacy we benefit from.

The consultee raises issues that will be dealt with as part of the ongoing preparation of the Fylde Core Strategy.

OC/IB/08/00557

Councils Response

Seek change

Mr Fielding

1 Noise controls - monitoring of noise levels in residential areas e.g. Blackpool Airport. Control on use of sirens on emergency vehicles

The consultee raises issues that will be dealt with as part of the ongoing preparation of the Fylde Core Strategy.

2 Urban environmental issues

OC/IB/08/00654

Councils Response

Seek change

West

Core Strategy Regulation 25

1 All sounds very negative/restrictive to me! Plan positively, what can planning do to help the economic well being of Fylde? The plan can encourage certain forms of development. Make a list of what you would welcome eg a 5 star hotel, a marina, high quality employment development, architecturally innovative schemes (anything - ecohomes, whatever) tourism related attractions/land uses.

The consultee raises issues that will be dealt with as part of the process of producing the Fylde Core Strategy.

OC/MISC/08/00671

Campaign for Real Ale Ltd

1 The Strategy should make clear the importance of public houses as focal points and recreational/social facilities within communities, especially rural settlements where other facilities are not available. The strategy should include policies to protect pubs from conversion to other uses unless clear and substantial evidence is made available to demonstrate non-viability.

Councils Response

The consultee suggests that community facilities, particularly public houses, should be included in the content of the emerging Core Strategy. The council accepts that community facilities should be included in the Core Strategy.

Seek change

The Council seeks the inclusion of community facilities in the content of the emerging Core Strategy.

OC/ENV/08/00685

Save our Shore Line

1 Dune management including dune restoration, flood management, flora and fauna assessment monitoring and protections. SSSI protection and monitoring especial orchids, toads, lizards etc. Tourism including environmental tourism.

Councils Response

The consultee suggests that dune management and environmental tourism should be included in the content of the emerging Core Strategy. The Council accepts this suggestion.

Seek change

The Council seeks the inclusion of dune management and environmental tourism within the content of the emerging Core Strategy.

OC/ISP/08/00694

Health & Safety Executive**Councils Response****Seek change**

Core Strategy Regulation 25

1 There may be a conflict between the development policies and the presence of the notifiable installations. Any proposed developments should take their presence into account. It is advised to consult the listed pipeline operator to confirm pipelines locations.

The consultee raises issues that will be addressed as part of the ongoing preparation of the Fylde Core Strategy.

There are notifiable installations in the plan area, a policy statement in plan to identify constraints to development would be useful. Suggest proposal maps marked to show the location of the notifiable installations.

OC/LPD/08/00722

Councils Response

Seek change

Morris Homes (North) Ltd

1 Be connected be positive about what it should contain including the level of private and affordable housing

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Fylde Core Strategy.

OC/NCC/08/00773

Councils Response

Seek change

British Horse Society

1 Provision for horse riding i.e. bridleways or horse riding routes.

OC/IB/09/01002

Councils Response

Seek change

Mr SJ

Cubbins

1 We are making representations on behalf of the travelling showman in Fylde area. Currently based on a site at Keppel Lane in Garstang, granted on appeal (20th May 2009) for 10 plots with up to two caravan per plot. Inspectorate granted five year temporary approval to allow for LDF process to bring forward a more suitable site in Fylde.

The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy.

Core Strategy Regulation 25

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|---|---|---|--|
| 2 | No provision for sites for Travelling Showmen in subjects, topics or themes. May be oversight or provision included under another topic heading. This provision should have individual; recognition. | The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy. |
| 3 | Encourage joint working between Wyre, Fylde and Blackpool Councils to provide allocated sites for Travelling Showmen. Happy to redevelop existing or develop new site and consider all locations with an open approach. | The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy. |
| 4 | Government have outlined the need for local authorities to make provision for sites in future Development Plans for Travelling Showmen and we also understand that there is sixty million pounds fund in place provided by Government to encourage and allow these sites to come to fruition. | The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy. |
| 5 | On behalf of the Travelling Showmen in the Fylde area we would ask that a site or sites are made available for consideration under your Local Development Framework. | The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy. |

OC/IB/10/01060

Mr & Mrs

Thorley

Councils Response**Seek change**

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|---|--|--|--|
| 1 | Include communication. This could include all masts, aerials of commercial or public nature e.g. mobile phone network infrastructure, telephone exchange, Inskip MOD area. This area is growing quickly. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |
| 2 | Energy, including wind farms, gas power stations (e.g. Elswick gas turbine power station unmanned). | The consultee suggest that renewable energy, including wind farms, should be included within the content of the emerging Core Strategy. The council accepts this suggestion. | The Council seeks the inclusion of renewable energy as a topic within the content of the emerging Core Strategy. |

OC/IB/10/01071

Miss

Clark

Councils Response**Seek change**

Core Strategy Regulation 25

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|---|--|---|--|
| 1 | Drinking water quality - pressure needs to be put on United Utilities who are unwilling to address issues over excessive chlorination to water. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |
| 2 | Upgrade utilities in rural areas to serve current population, never mind proposed housing development. Electricity voltage levels and broadband in particular. | The consultee suggests that infrastructure provision, including updating utilities, should be included within the content of the emerging Core Strategy. The Council accepts this suggestion. | The Council seeks the inclusion of infrastructure planning within the content of the emerging Core Strategy. |

OC/IB/10/01086

W & T Rowe

- | | | | |
|---|--|--|--|
| 1 | Sustainable rural communities - advocate a critical re-appraisal of countryside policies to ensure that policies are positively directed towards the encouragement of measures which will protect and improve community facilities and services. Currently land use policies do not appear to relate to the scale of development which may be required to maintain the village school, public transport services and other key facilities, the absence of which clearly damages the quality and prospects of rural life. | The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy. | |
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Councils Response

Seek change

SCB/SCB/10/01164

LSP People and Communities Theme Group

Councils Response

Seek change

Core Strategy Regulation 25

1	<p>Support the inclusion of housing, employment and climate change as they are important factors for cross partner working to help address a formal mechanism for Health to be able to play a more proactive role in the future.</p>	<p>The consultee suggest that health and wellbeing should be included as a topic area within the emerging Core Strategy. The Council accepts this suggestion.</p>	<p>The Council seeks the inclusion of health and wellbeing as a topic within the emerging Core Strategy.</p>
	<p>Health and Wellbeing should be included as a theme in the Core Strategy and effective appraisal system incorporated into the preparation of the Core Strategy and relevant future planning developments. Core Strategy should highlight where it can help address specific health priorities for the Fylde area. There needs to be infrastructure to allow health and other partners to work together.</p>		

Core Strategy Regulation 25

- 2 Provide a effective and efficient system for SA/SEA. Integrate Equality Impact Assessment (EIA) and Health Impact Assessment (HIA) into the planning process where appropriate. The first stage would be an EIA of the Core Strategy and a policy developed to agree the use of HIA in all planning developments of an identified size and complexity. This would provide the evidence base required to make informed decisions to identify and appraise alternatives and give feedback as part of an effective consultation process.

Through the HIA partners can work together more effectively and offer their expertise in the planning process that will provide the opportunity for participation in the development process and research so any plan is backed up with evidence based background facts. Being able to demonstrate that the plan is the most appropriate, having gone through an objective process of assessing alternatives, will pay dividends in terms of an easier passage for the plan through the examination process.

A working tool of how the HIA process can report into the SA process is available from the Department of Health publication 'Health Impact Assessment Tools: Simple Tools for recording the results of the Health Impact Assessment'. This system is being utilised in a neighbouring District.

- 3 I recognise that the focus of the Core Strategy, as the centre component of the Fylde Local Development Framework, should be concentrating on devising a local, evidence based delivery strategy. The strategy should deal with the particular issues which have been identified of local importance as reflected in local plans and in particular in line with the Fylde Sustainable Community Strategy.

The consultee states that a Health Impact Assessment should be undertaken of policies within the emerging Core Strategy. The Council accepts this.

The Council accepts that health and wellbeing should be included within the emerging Core Strategy and a Health Impact Assessment undertaken of policies within the Core Strategy.

The consultee raises an issue that will be dealt with as part of the ongoing production of the Core Strategy.

Core Strategy Regulation 25

OC/FARM/11/01264

B W & J Robinson**Councils Response****Seek change**

- 1 Renewable energy projects: wind, anaerobic digestions and photovoltaic

The consultee suggests that renewable energy, including anaerobic digestion and photovoltaic, should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of renewable energy within the content of the emerging Core Strategy.

OC/IB/11/00987

Mugridge**Councils Response****Seek change**

- 1 Concerned about unwarranted outward expansion of development into the countryside.
- 2 Generally, the development plan procedures that applied prior to 2004, in particular at the strategic level, are to be preferred. The intended RSS abolish is welcomed.
- 3 The urban concentration strategy that underpinned all modern Lancashire development plans remains valid and vital to the preparation of all future development documents.
- 4 The settlement hierarchy which indicates appropriate levels of growth in towns and villages should be preserved. The existing tiers and scales of appropriate development should also be retained.
- 5 Preserve all green farmland.
- 6 Need to establish the appropriate level of housing provision throughout the Borough before the alteration of any settlement boundary is considered. The uncertainty over pending major development proposals (Queensway, Whitehills, Richmond Avenue etc.) needs to be removed.

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

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Appendix 2: Vision Issues and Objectives: Consultation Responses
Core Strategy Regulation 25

7	Development outside existing settlements in the open countryside should continue to be strictly controlled and limited to the presently defined categories of acceptable development.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.
8	Development in the Green belt should be strictly controlled. The presumption against development in these areas should be rigidly applied.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.
9	Housing: the intention of the Secretary of State to abolish regional spatial strategies and top - down housing targets is to be welcomed. The SHLAA was prepared as a direct response to the regional spatial strategy five year supply requirement. An alternative to the SHLAA must be applied to addressing the need for housing provision. The Lancashire Joint Structure Plan 2001-2016 indicates that, in Fylde, 90% is an appropriate target for the use of previously developed land. This is an appropriate and realistic target.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.
10	Strict criteria should continue to be applied to the development of sites within the defined limits of development.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.
11	Affordable housing development outside the defined limits of development should only be permitted where bona fide local need is clearly established supported by a current needs survey.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.
12	Out of centre retail development: Should continue to be strictly controlled.	The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

OC/AGCN/08/00231

Alderney Estates Ltd

Councils Response

Seek change

Core Strategy Regulation 25

1	Dogmatically worded policies encourage a tick box mentality whereby all policies must be complied with in full whereas in real life compromise is needed. Plan should make clear that it is the overall benefit of development which is important and all matters considered in the balance and that it is not necessary to comply with all aspects.	The comments relate to issues that will be covered as part of the ongoing progression of the Fylde Core Strategy.	
SCB/LA/08/00391		<u>Councils Response</u>	<u>Seek change</u>
Wyre Borough Council			
1	No		
OC/IB/10/01015		<u>Councils Response</u>	<u>Seek change</u>
The Rooneys			
1	Need to generate the economy by building houses and affordable accommodation. High unemployment in construction industry. Discourage 'N.I.M.B.Y' approach to development.	The consultee raises issues that will be dealt with during the course of ongoing preparation of the Core Strategy.	
OC/IB/10/01020		<u>Councils Response</u>	<u>Seek change</u>
Save Wrea Green Action Group			
1	Use Neighbourhood Plans re Housing	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.	
2	Use proven LOCAL need	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.	

Appendix 2: Vision Issues and Objectives: Consultation Responses
Core Strategy Regulation 25

3	Sustainability	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
4	Accessibility (use RSS assessment)	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
5	Neighbourhood safety	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
6	Minimise use of Best and Most versatile Agricultural Land	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
7	Noise pollution	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
8	Consider the Rising Water table in East Fylde	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.
9	Adequacy of existing infrastructure	The consultee raises an issue that will be dealt with during the ongoing preparation of the Core Strategy.

OC/AGCN/10/01022

JWPC Ltd

1 Review of Tourism policy/designations

Councils Response

The consultee suggests that tourism should be included as a topic within the content of the emerging Core Strategy. The Council accepts this suggestion.

Seek change

The Council seeks the inclusion of tourism as a topic within the content of the emerging Core Strategy.

OC/GYPS/11/01179

Heine

Councils Response

Seek change

Core Strategy Regulation 25

- 1 Housing topic should address provision for gypsy-travellers, especially for private family sites. Updated need assessment in Fylde should take account for need, including families on unauthorised sites and concealed on holiday/residential parks.

The consultee suggests that the needs of gypsies and travellers should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of the needs of gypsies and travellers within the content of the emerging Core Strategy.

OC/AGCN/11/01345

DPP LLP**Councils Response****Seek change**

- 1 Develop future Core Strategy housing policies to support sustainable economic growth, and in particular, maintain a flexible and responsive supply of land for housing provision and meet the housing needs of the area. Policies should be in line with PPS3 and the recent Government statement 'Planning for Growth' (23 March 2011)

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

- 2 Our client David Wilson Homes North West supports the Draft Spatial Vision's acknowledgement of the delivery of sustainable housing and would seek clarification at future stages of the Core Strategy's production of the balance of Brownfield / Greenfield housing development.

The consultee raises an issue that will be dealt with as part of the ongoing preparation of the Core Strategy.

- 3 Welcome consultation on subsequent stages in the production of Core Strategy policies, particularly policies relating to planning contributions.

The consultee suggests that planning contributions should be included within the content of the emerging Core Strategy. The Council accepts this suggestion.

The Council seeks the inclusion of developer contributions within the content of the emerging Core Strategy.

A Draft Spatial Vision for Fylde (Full consultation version)

Borough wide Vision

By 2030, Fylde will continue to be a place that is recognised regionally, nationally and internationally for its unique and special qualities including its tranquil open coastline, high quality golf courses, tourism offer, attractive towns and picturesque villages and pleasant rural landscapes.

Fylde will continue to be somewhere that people desire to live, work and visit. It will be a place that strives to provide an improving quality of life for all of its citizens; where everybody will have access to quality homes and employment. People will feel safe, valued and respected and will have the opportunity to reach their full potential. The social, health and economic inequalities which exist within the borough will have been reduced. Access to healthy lifestyle choices, local health care facilities and lifelong learning facilities will have been improved. Significant further opportunities and facilities for young people will have been provided.

Fylde will have strengthened its position as 'the place to be' within the Fylde Coast sub region (Fylde, Blackpool and Wyre). Closer working relationships will have been established with those adjacent Councils which will have enabled a more strategic, coordinated and sustainable approach to spatial planning for the sub region in order to protect the special nature of Fylde. There will be increased partnership working with other organisations, agencies and other public bodies in order to deliver the spatial planning agenda. Fylde will also have strengthened its position within the Central Lancashire City Region and its linkages with the City of Preston.

By 2030, Fylde will have continued to develop as a dynamic, prosperous and balanced community through the delivery of sustainable housing and employment growth, supported by the necessary facilities, services and infrastructure. In particular the new housing will have been built in sustainable locations and will be comprised of an appropriate tenure, type and mix to address issues of affordability, and a shortage of housing suitable for families. New sustainable employment development will have been provided close to where people live, in order to help diversify the economic base of the Borough and further enhance local opportunities for a variety of employment types. There will have been appropriate development in the rural areas where it addresses rural diversification, local needs or supports local facilities. The jobs, houses and other services and facilities which have been provided will have progressed towards a sustainable, self-contained community reducing the need to travel and maximising opportunities for delivery of sustainable transport provision.

The separation of existing settlements will have been maintained and green belts will have been preserved. The release of countryside for development will be minimised. The visitor economy both coastal and rural will have been significantly strengthened. Existing facilities will have been enhanced and new sustainable high quality visitor facilities and accommodation will have been provided. Increased numbers of people will visit Fylde for holidays, day trips, leisure and business stays. The development of the Ribble Coast and Wetlands Regional Park will have been supported and opportunities taken to achieve the related social, economic and environmental benefits to the Borough. The range of international events taking place within the borough will have been expanded.

The best elements of the natural environment of the Borough will have been identified, comprehensively protected and enhanced. In particular the special open character of the coastline and the areas of ecological and landscape interest will continue to have been protected from unsympathetic development. Coastal defences will have been improved and their associated recreational and environmental benefits

realised. The quality of the built environment will have been conserved and enhanced with high quality design and sustainable building methods being key principles of all new development.

The highest quality agricultural land within Fylde Borough will have been identified and protected from development.

The Lytham St Annes to M55 link road will have been completed throughout its length and the most pressing problems on the A585 (T) between the M55 and Norcross will have been addressed. Expansion of the services and facilities provided by Blackpool International Airport will have been secured, along with enhanced public transport access to the airport. Opportunities for specialised related employment uses close to the airport will have been realised. Fylde is a flat area with great potential for walking, cycling and horse riding. More routes and facilities will have been provided to facilitate increased take-up of these modes / pursuits.

Access to modern telecommunications will have improved for all. Broadband coverage and speeds in the rural areas will have increased the potential for home working and created economic benefits for local firms.

The potential of the Borough for sustainable renewable energy generation and low carbon energy regeneration will have been realised.

Those matters which involve potential uncertainty in relation to spatial planning issues will have been identified and addressed. These could include significant changes to the scale and distribution of employment development in the borough for example a contraction of BAE, the potential closure of Weeton Camp.

Vision for Lytham and St Annes

By 2030 Lytham and St Annes will have continued to develop as main centres for the Borough. Sustainable housing and jobs will have been delivered and the vitality and viability of both the town centres will have improved. The Lytham St Annes to M55 Link Road will have been completed.

The visitor economy of St Annes will have been strengthened and expanded with increasing numbers of people visiting for all types of holidays, day trips and business stays. The seafront / promenade gardens will have been regenerated to provide a unique, high quality visitor experience. St Annes will have been recognised as a Classic Resort* offering an exemplary visitor experience.

Lytham will have further consolidated its position as a highly attractive unspoilt Victorian coastal town. It will have further exploited its historic and cultural interest. Lytham will have become established as a key visitor hub for the Ribble Coast and Wetlands Regional Park.

Lytham and St Annes will have reinforced their reputation for high quality internationally renowned golf courses and competitions along with their more general character as prestigious, spacious, attractive, safe places with high quality built environments and unique retail offers

*The term Classic Resort refers to the concept of a hall mark for seaside resorts. It is an aspiration at this stage.

Vision for Kirkham and Wesham

By 2030, the attractive, historic market town of Kirkham and its neighbour Wesham will have enhanced roles as centres, providing a good range of retail, leisure, community facilities and services for residents of the town and the surrounding rural areas.

Sustainable housing, employment, services and facilities of an appropriate scale will have been delivered so as to strengthen their role as important centres.

Environmental quality and enhanced quality of life will have been improved. Public transport services to Blackpool, Preston and beyond will have been improved, as will the railway station facilities including car parking at the station, making the town more accessible to other parts of the North West and increasing its sustainability as a residential and employment centre.

Vision for Freckleton and Warton

By 2030 Freckleton and Warton will have defined their roles as centres providing a range of retail and community facilities for local people. They will have continued to grow having regard in part to the potential for business and industrial development to locate within and around the British Aerospace (BAe) complex and the potential for new dwellings to house local workers. In particular, Warton will have been provided with a village centre, along with better facilities for local residents.

The role of Freckleton within the Ribble Coast and Wetlands Regional Park will have been established.

The potential challenges posed by any significant changes in the operation of the BAe business at Warton will have been addressed. Employment opportunities and infrastructure to support new economic development will have been provided.

Vision for Smaller Rural Villages

In the smaller rural settlements proportionate levels of housing will have been built of appropriate tenure, type and mix to address issues of affordability and the shortage of housing suitable for families. Proportionate levels of employment growth will also have taken place to strengthen and diversify the local economies and reduce the need to travel. All development will have respected and conserved the individual character of the village in question.

Draft Succinct Vision for Fylde

By 2030 Fylde will have retained its unique qualities including its seaside resort towns, tranquil open coastline, high quality golf courses, tourism offer, picturesque villages and pleasant landscapes.

The visitor economy will have been strengthened by the area's resort appeal, its reputation as a centre for world famous golf championships and attractive rural landscapes. High quality attractions and accommodation will have been provided, generating an increase in the amount of visitors. The seafront, promenade gardens at St Annes and Fairhaven Lake will have been regenerated to provide a unique visitor experience.

Fylde will be a welcoming place with highly skilled, healthy communities.

There will be a diverse and prosperous culture and an economy that encourages everyone to contribute. Access to healthy lifestyle choices, local health care facilities, good education and lifelong learning facilities will have been improved. Significant further educational opportunities and leisure facilities for young people will have been provided.

Lytham and St Annes will be thriving resorts with quality specialist shops, with Kirkham a historic market town. Wesham, Freckleton, Warton and the smaller rural villages will have retained their individual identities and built heritage.

There will be improved retail and community facilities for local people at Freckleton and Warton and a new village centre at Warton. All residents will have the opportunity to access public services, good jobs and decent, affordable homes.

Adaptation and mitigation measures will have helped to address adverse effects of climate change and energy use will be minimised, with a high dependence on renewable sources. The potential of the Borough for renewable energy generation and low carbon energy regeneration will have been realised.

Sufficient open space and recreation facilities will have been provided,

woodland increased and the area's unique pattern of coast and dunes, green spaces and countryside will be accessible and contribute to a high quality of life. The separation of existing settlements will have been maintained, the release of countryside for development minimised and the highest quality agricultural land will have been protected from inappropriate development, with an emphasis on local food production.

Biodiversity will have been enhanced and protected from unsympathetic development. Lytham St Annes will be a key visitor hub for the Ribble Coast and Wetlands Regional Park and opportunities will have been taken to achieve the Regional Park's social, economic and environmental benefits to the area. Coastal defences will have been improved and their associated recreational and environmental benefits realised.

There will have been a reduction in the need to travel and increased use of sustainable forms of transport. Taking advantage of Fylde's flat landscape, more routes and facilities will have been provided to facilitate increased walking, cycling and horse riding.

The Lytham St Annes to M55 link road will have been completed and congestion issues on the A585 associated with traffic accessing the Port of Fleetwood will have been addressed. Expansion of services provided by Blackpool International Airport will have been secured, along with enhanced public transport access to the airport. Public transport services to Blackpool, Preston and beyond will have been improved, as will the railway station facilities at Kirkham and Wesham, making the town more accessible to other parts of the North West and increasing its sustainability as a residential and employment centre.

Fylde will have remained flexible in its approach to changing economic and employment patterns, particularly with regard to major local employers such as British Aerospace. It will have developed closer working relationships with adjacent Councils and other organisations and strengthened its position within Lancashire and its linkages with the city of Preston.

It will have continued to develop as a dynamic, prosperous community through the delivery of sustainable housing and employment growth, supported by the necessary facilities, services, infrastructure and access to modern telecommunications. New housing of an appropriate type and mix to address affordability, an ageing population and family needs will be located in suitable locations. High quality design and sustainable building methods will be the key principles of all types of new development. Opportunities for specialised related employment uses near to the airport will have been realised and employment will have been provided close to where people live.

Sufficient levels of housing of appropriate type and mix to address local issues of affordability and the shortage of family housing will have been provided in the smaller rural settlements. There will have been proportionate levels of employment growth to strengthen and diversify the local economies and reduce the need to travel. All development will have respected and conserved the individual character of the villages.

Core Strategy Spatial Objectives

The spatial objectives aim to address the key issues that have been identified for the Borough. The Core Strategy will set down policy that helps to move towards achieving the objectives so that we will come closer to achieving the Spatial Vision.

There will be an overarching objective that all new development will be sustainable. Objectives 2-5 will contribute to achieving that primary objective. The most widely accepted definition of sustainable development is “Development which meets the needs of the present without compromising the ability of future generations to meet their own needs” (Bruntland Report 1987). This will be achieved by ensuring that sustainability appraisal is used to inform policy and development proposals.

Objective 1: To Create Sustainable Communities

All new development will be in sustainable locations to minimise the use of private transport and avoid areas at risk of flooding. New development will follow sustainable design principles and incorporate sustainable building practices, reducing carbon emissions, ensuring water and waste efficiency and ensuring that they are resilient to the effects of climate change. Brownfield sites will be used in preference to greenfield sites and the quality of the openness of the Green Belt maintained. Planning Obligations will be used to bring development in line with the objectives of sustainable development.¹

A sustainable approach to housing will be taken. This will:

- Improve access for all to well designed, good quality, affordable and resource efficient housing across the Borough.
- Meet the specific housing needs of all sections of the community (including affordable and special needs housing) by providing the right housing type and mix to secure sustainable communities and² to improve housing choice. In particular to provide more houses suitable for families rather than flats more suited to retirement purposes.
- Bring forward a flexible and responsive supply of housing land and buildings in sustainable locations to meet housing requirements.
- Make the best³ use of previously developed land and buildings to reduce the loss of greenfield land.

Objective 2: To Improve the Environment by:

- Protecting, enhancing and restoring⁴ the quality, character and distinctiveness of the biodiversity, geodiversity⁵, landscape and countryside⁶ of Fylde Borough.

¹ **Source:** Letters; **Comments:** The government’s Practice Guide for Planning Obligations states that Planning Obligations are often used “to bring development in line with the objectives of sustainable development.” This terminology is used instead of the word ‘mitigate’.

² **Source:** Letters; **Comments:** Remove the word “seek”, in order to focus on improving housing choice.

³ **Source:** Letters; **Comments:** This bullet point needs applying flexibly as some brownfield sites can be of high biodiversity value.

- Expanding biodiversity resources,⁷ including improving habitat connectivity, particularly away from the coastal edge.⁸
- Promoting green infrastructure interventions throughout the urban and rural areas.⁹
- Improving access to the natural environment.¹⁰
- Protecting and enhancing the built and historic environment of Fylde Borough and requiring new developments to meet the highest quality of urban design.
- Minimising the risk of flooding, both tidal and fluvial, to existing and new development.
- Protecting the best and most versatile agricultural land and increasing UK food security.¹¹
- Promoting sustainable¹² renewable energy in order to reduce carbon emissions.
- Supporting the Regional Park Plan for Ribble Coast and Wetlands.
- Ensuring that infrastructure is available to enable new development whilst protecting and enhancing the natural and built environment.
- Retaining the identity, character and setting of the rural villages.¹³

⁴ **Source:** Statutory consultee (LCC Planning Policy); **Comment:** Reflect national biodiversity objectives in PPS9, which is not only to enhance but to achieve favourable condition, restore and expand biodiversity resources.

⁵ **Source:** Statutory consultee (Natural England); **Comment:** Refer to the protection and enhancement of geodiversity assets.

⁶ **Source:** Community engagement events, statutory consultees (CPRE, Natural England, Westby-with-Plumpton Parish Council); **Comment:** Numerous comments received in relation to the preservation of the countryside.

⁷ **Source:** Statutory consultee (LCC Planning Policy); **Comment:** Reflect national biodiversity objectives in PPS9, which is not only to enhance but to achieve favourable condition, restore and expand biodiversity resources.

⁸ **Source:** Statutory consultee (LCC Planning Policy); **Comments:** Lack of habitat connectivity is a major biodiversity issue, particularly away from the coastal edge.

⁹ **Source:** Identified by Fylde Borough Council.

¹⁰ **Source:** Statutory consultee (LCC Planning Policy); **Comment:** Make reference to access to the natural environment. There is poor access throughout much of the rural borough.

¹¹ **Source:** Community engagement events, letters, statutory consultee (CPRE); **Comments:** Include reference to UK food security, protecting the best and most versatile agricultural land.

¹² **Source:** Statutory consultee (Natural England); **Comments:** Change to "promoting sustainable renewable energy."

¹³ **Source:** Community engagement events, SCS Resident Focus Group, letters; **Comments:** Retain the identity, character and setting of the rural villages.

Objective 3: Making Services Accessible by:

- Taking an integrated approach to the location of development with improved connectivity between key facilities (via walking, cycling and public transport) in order to allow the opportunity for reduced reliance on the private car.
- Reducing rural isolation and social exclusion through the protection and provision of key services and facilities, where viable,¹⁴ in rural areas within the defined settlements. This may be linked to small amounts of new housing in the rural villages.
- Promoting the South Fylde Rail Line and its Community Rail Partnership status.
- Facilitating appropriate development at Blackpool International Airport.
- Encouraging the improvement/construction of the M55/Heyhouses Link Road.
- Continuing the Councils involvement in the key decisions seeking to improve the A585 trunk road (M55-Norcross).
- Improving access at Kirkham and Wesham Station.

Objective 4: To Diversify and Grow¹⁵ the Local Economy by:

- Diversifying the Borough's economic base in order to reduce reliance on a small number of large employers.
- Make provision for high quality and readily available sites in sustainable locations that will facilitate the growth of existing local firms and be attractive to new inward investment including high technology uses.
- Protecting existing employment land and premises where appropriate.
- Enhancing town centres through the promotion of mixed uses and focussing on developments that attract a large number of people including retail uses.
- Developing a distinctive image of the Borough as a business location based on existing assets such as British Aerospace, Whitehills Park and Blackpool International Airport.
- Developing a widely recognised image of the Borough as a quality tourism destination based on existing assets such as the high quality hotels, the open coastline (including the Regional Park and the championship golf courses). Maximising the potential of the Visitor Economy.
- Promoting the classic resort image/initiative for Lytham St Annes.*
- Promoting the continuing improvement of the vitality and viability of the town centres.

* The term 'classic resort' refers to the concept of a hallmark for seaside resorts. It is an aspiration at this stage.

¹⁴ **Source:** Statutory consultee (LCC Property Group); **Comments:** Add "where viable" after "facilities."

¹⁵ **Source:** Statutory consultee (LCC Planning Policy); **Comments:** The word 'regenerate' in the heading may be inappropriate given the relative strength of Fylde's economy. The words 'diversify and grow' would be more applicable.

Objective 5: To Develop Socially Cohesive, Diverse and Healthy Communities by:

- Engaging and empowering local communities to be involved in creating places, and local matters that shape their areas.
- Ensuring that new development¹⁶ seeks to address pockets of deprivation.
- Increasing and enhancing open space provision throughout the Borough.
- Promoting good health and wellbeing¹⁷ by providing accessible high quality open space in association with new developments.
- Incorporating crime prevention and health and wellbeing¹⁸ measures into the design and layout of new developments.
- Reducing urban isolation and rural exclusion through the promotion of appropriate tenure mixes in new developments and improved accessibility to key services and facilities.
- Retaining the identity, character and setting of the rural villages.¹⁹
- Promoting access to and support for lifelong learning opportunities and facilitating access to schools.
- Facilitating access to community facilities²⁰, including health and social facilities, throughout the Borough.

¹⁶ **Source:** Letters; **Comments:** Identify pockets of deprivation other than St. Annes.

¹⁷ **Source:** Statutory consultee (LCC Planning Policy); **Comments:** Add “and wellbeing” after the word “health” as this ensures broader issues including mental health are covered.

¹⁸ **Source:** Statutory consultee (LCC Planning Policy); **Comments:** Add “health and wellbeing” after crime prevention measures, so it reads “Incorporating crime prevention and health and wellbeing measures into the design and layout of new developments.”

¹⁹ **Source:** Community engagement events, SCS Resident Focus Group; **Comments:** Character, identity and rural setting of the villages must be retained and maintain character, identity and community spirit of Elswick. Growth needs to be sensitive to the area (Elswick) and need to plan development so that it is sympathetic with its surroundings and environment (Staining). Limit the expansion and development of towns which may be detrimental to the rural villages.

²⁰ **Source:** Letters; **Comments:** Make reference to the provision of suitable locations for community facilities.

Appendix 3

Issues and Options Consultation Material

Council logo on front page
for A4 or A3 doc

Fylde Local Plan to 2030

Plan for Fylde, Plan for the Future

Issues & Options Consultation

Starts Thursday 7th June – Ends Thursday 19th July 2012

The Council is developing a document called the Local Plan to guide development in the borough to 2030. It will ensure new homes, jobs and services are located in the most sustainable locations, along with the necessary infrastructure and facilities.

We are keen to seek your views on the issues and options for planning Fylde's future. Come to a community engagement event listed below, visit Fylde Direct at St Annes, visit libraries across Fylde Borough or go online to find out further information and comment.



Pictures somewhere on page to represent the following:

Housing		Environment	Economy	Infrastructure
Date	Venue	Community Engagement Bus		Time
11 th June	Lytham – Lytham Assembly Rooms, Dicconson Terrace, FY8 5JY			3pm – 7pm
12 th June	Wrea Green - Outside the Post Office, PR4 2NE			10am – 12noon
12 th June	Weeton - Car Park, Weeton Village Hall, Knowsley Crescent, PR4 3ND			1pm – 3pm
12 th June	St Annes - United Reformed Church Hall, Clifton Drive North, St Annes FY8 2AE			3pm – 7pm
13 th June	Squires Gate - Morrison Car Park, Squires Gate Lane, FY4 2AY			11am – 2pm
13 th June	Warton - Warton Village Hall, Church Road, PR4 1BD			3pm – 7pm
14 th June	Newton - Car Park, Newton Village Stores, Bryning Lane, PR4 3RN			1pm – 3pm
15 th June	Wesham - Car Park, Wesham Community Centre, Church Road, PR4 3DQ			10am – 12noon
15 th June	Singleton - Car Park, The Miller Arms, FY6 8LL			1pm – 3pm
18 th June	Kirkham - Kirkham Community Centre, Mill Street, PR4 2AN			3pm – 7pm
19 th June	St Annes - Car Park, The Square, St Annes Road West, FY8 1RN			11am – 2pm
20 th June	Elswick - Elswick Village Hall, Roseacre Road, PR4 3UD			3pm – 7pm
21 st June	Staining - Staining Village Hall, Chain Lane, FY3 0DD			3pm – 7pm
22 nd June	Ansdell - Car Park, Outside Post Office, Commonsides, FY8 4DJ			10am – 12noon
22 nd June	Freckleton - Tom's Croft Car Park, off Preston Old Road, PR4 1PA			1pm – 3pm

For further information, please contact the Planning Policy Team: Tel: 01253 658418, or email planningpolicy@fylde.gov.uk

www.fylde.gov.uk/localplan/

Electronic version of questionnaire:

Fylde Local Plan to 2030 - Issues & Options

Issues and Options Consultation

You will need to have read the relevant sections from the Fylde Local Plan Issues and Options Consultation Document and the Interim Sustainability Appraisal in order to respond to this questionnaire.

See the list overleaf which shows the chapters that relate to each question. The Consultation Document is available online at www.fylde.gov.uk/localplan/ or paper copies are available to view at Fylde Direct, St Annes and at public libraries across Fylde Borough. It is also available on CD from the Planning Policy Team.

How to respond

You can either respond online or by using this printed questionnaire. You can respond to as many or as few questions as you like. If you feel that there are other realistic and achievable options not covered by the questionnaire, or if you have any other comments, please include them on a separate sheet or email: planningpolicy@fylde.gov.uk.

Online: You may find it easiest and quickest to respond online. You can access the online consultation using the following link: www.fylde.gov.uk/localplan/

By Post: The questionnaire can be completed and returned by post to Fylde Borough Council using the FREEPOST address set out in the 'What to do next' section at the end of the questionnaire.

In order for us to process your response you will need to provide us with your full contact details and (if applicable) which organisation you represent.

If you are responding with a printed questionnaire and need more space, please attach additional comments separately, clearly stating which question you are responding to.

What is the deadline for responding?

The deadline for consultation responses is midnight on Thursday 19th July 2012. Please note the Council cannot guarantee that responses received after the consultation deadline will be considered.

How will you take my comments into account?

All comments received by the deadline will be taken into account in preparing the next stage of the Local Plan, called the Preferred Options. We will produce a separate report that summarises the comments received and sets out how they have been responded to.

What if I have any further queries?

If you have a query about any aspect of this consultation please contact the Planning Policy Team on 01253 658418 or email planningpolicy@fylde.gov.uk

Key Issues and Objectives - Local Plan Chapters 1 - 4

Fylde Local Plan to 2030 - Issues & Options

The Spatial Options - Local Plan Chapters 5 - 6 and Questionnaire Q1

The Policy Options

Provision of Homes - Local Plan Chapter 7 and Questionnaire Q2 - 9

The Fylde Economy - Local Plan Chapter 8 and Questionnaire Q10 - 13

Climate Change, Renewable Energy and Flood Risk - Local Plan Chapter 9 and Questionnaire Q14 - 18

The Natural Environment and Heritage Local Plan Chapter 10 and Questionnaire Q19 - 22

Infrastructure and Transport - Local Plan Chapter 11 and Questionnaire Q23 - 27

Next Steps - Local Plan Chapters 12 - 13 and Questionnaire Q28 - 29

Contact Details

Contact Details

What is your first name?

What is your last name?

What is your postal address?

Are you representing an organisation or body?

Yes

No

If yes please state the name if different to that above:

What is your contact telephone number?

Fylde Local Plan to 2030 - Issues & Options

Do you have an email account?

- Yes
- No

If yes enter email address:

Would you like to be added to our Consultation Database?

- Yes
- No

If Yes, how would you like to be consulted?

- By Letter
- By Email

The Spatial Options

Fylde Local Plan to 2030 - Issues & Options

Q1: Spatial Options

Which one of the alternative spatial options set out in chapter 5 do you support?

- Option 1 - Focus on Lytham St Annes
- Option 2 - Equal focus on Lytham St Annes and Kirkham
- Option 3 - Lytham St Annes and Key and Local Service Centres
- Option 4 - Lytham St Annes and rural dispersal
- Option 5 - Equal focus on Lytham St Annes and land on the SE edge of Blackpool
- Option 6 - A further alternative spatial option. Please explain how this option would achieve the Plan's Vision and Spatial Objectives

If you have chosen Option 6, please explain why:

The Policy Options - Provision of Homes

Fylde Local Plan to 2030 - Issues & Options

Q2: Gross Housing Figure

Do you agree with the Gross Housing Figure for the borough of 278 dwellings per annum?

- Yes
 No

If you ticked 'no', please state what you think the figure should be and supply evidence to support any change to the figure.

Q3: Housing Mix

To ensure a better mix of house types, which of the following options do you support? Please tick all that you support.

- Option A - Leave it to the private sector, apart from affordable housing requirements, to determine the right mix of house types.
- Option B - Develop policies to restrict the development of flats in certain parts of Lytham St Annes and promote family housing across all parts of Lytham St Annes.
- Option C - Develop policies which set out the requirement for a broad mix of different types and sizes of housing on all large housing development sites. These policies will accommodate the different circumstances (demographics and balance of existing stock) in different parts of the borough.
- Option D - Continue with existing policies to require a mix of housing in all but the smallest developments, without setting detailed requirements.
- Option E - In rural areas there should be a mix of house sizes with sufficient emphasis on smaller homes.
- Option F - Specialist housing should be provided for older people, to cater for their increasing numbers, especially in Lytham St Annes.

Fylde Local Plan to 2030 - Issues & Options

Q4: Housing Density

To ensure land is used efficiently, whilst at the same time preserving the appearance of the built environment, which one of the following options do you support?

- Option A - The private sector should be able to determine densities.
- Option B - A range of densities should be developed and applied to best suit the character and requirements of different parts of the borough.
- Option C - A minimum density should be applied throughout the borough.

Q5a: Housing Need in Rural Villages

Should a policy similar to the saved rural exception policy be included in the Local Plan?

- Yes
- No

Q5b: Housing Need in Rural Villages

If a need for affordable housing is identified in rural villages, should some market housing be permitted in order to fund affordable housing?

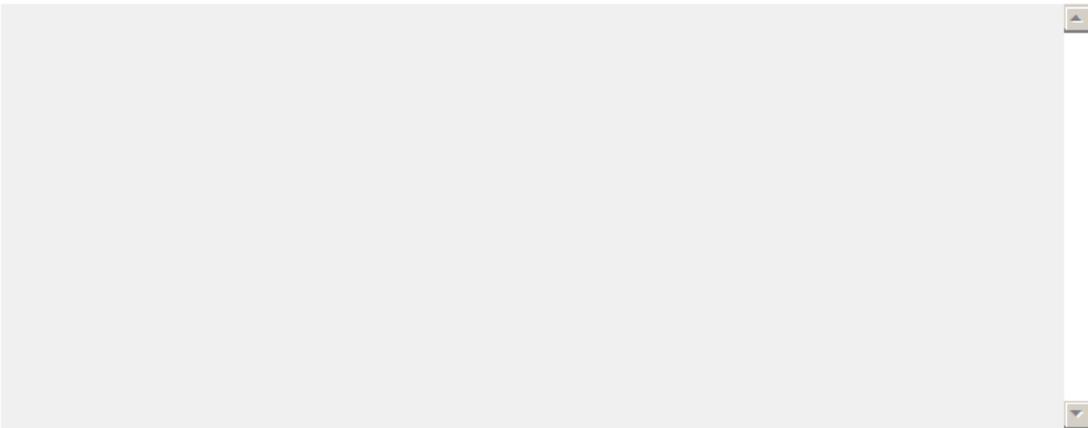
- Yes
- No

Q6: Provision of Affordable Housing

To ensure that opportunities for providing affordable housing are maximised, which one of the following options do you support?

- Option A - The current policy approach should continue, unless a viability study shows that policies need to change.
- Option B - The current policies should change.
- Option C - There should be an aim to provide affordable rented housing on every new housing site.

If you support Option B, do you think that the thresholds should change, or do you think the method of providing affordable housing should change?



Fylde Local Plan to 2030 - Issues & Options

Q7: Lifetime Homes

Which of the following options do you support? You may choose more than one option.

- Option A - All new market homes should be built to Lifetime Homes Standards.
- Option B - Only a percentage of new market homes should be built to Lifetime Homes Standards.
- Option C - All new affordable homes should be required to be built to Lifetime Homes Standards.
- Option D - Only a percentage of new affordable homes should be built to Lifetime Homes Standards.

If you support Option B or Option D, what percentage would you suggest and why?

Q8: Park Homes

If park homes are permitted should there be a requirement for contributions to affordable housing, in the same way as market housing is required to?

- Yes
- No

Q9: Community Self Build

Should the Council reserve the right to refrain from requesting contributions for affordable housing with Community Self Build Schemes?

- Yes
- No

The Policy Options - The Fylde Economy

Fylde Local Plan to 2030 - Issues & Options

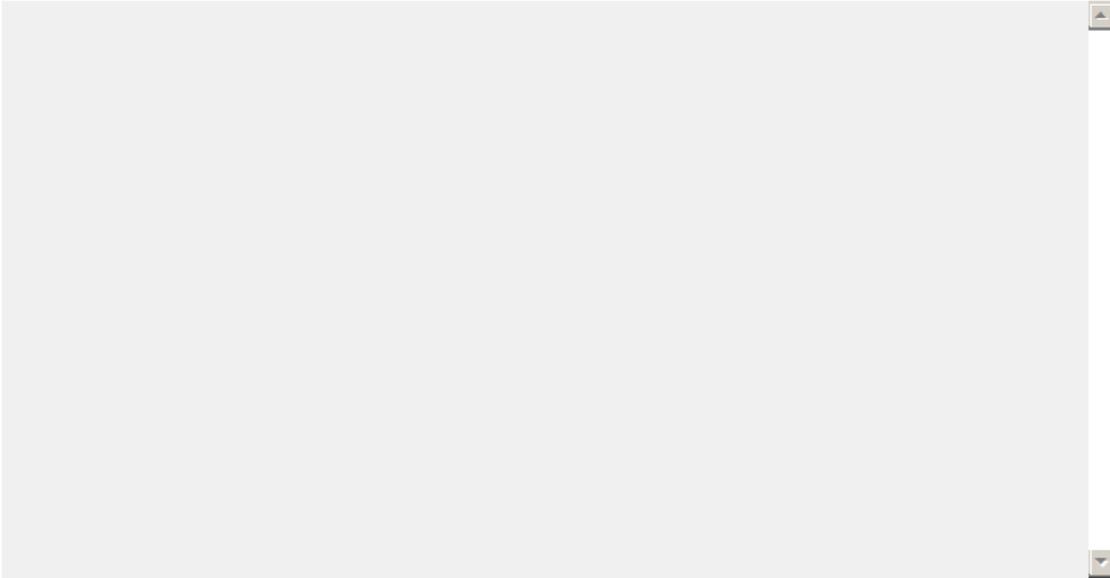
Q10: Economy and Employment

Do you agree with the approach to dealing with economy and employment, as set out in paragraphs 8.21 - 8.23 of the consultation document?

Yes

No

If you ticked 'no', please suggest alternative approaches



Q11: Provision of new Retail Development

Which of the following Options do you support? Please tick all that you support.

Option A - The market should decide where new retail development should be located.

Option B - The approach recommended in the Fylde Retail Study should be followed.

Option C - Increased convenience provision in the rural centres should be supported.

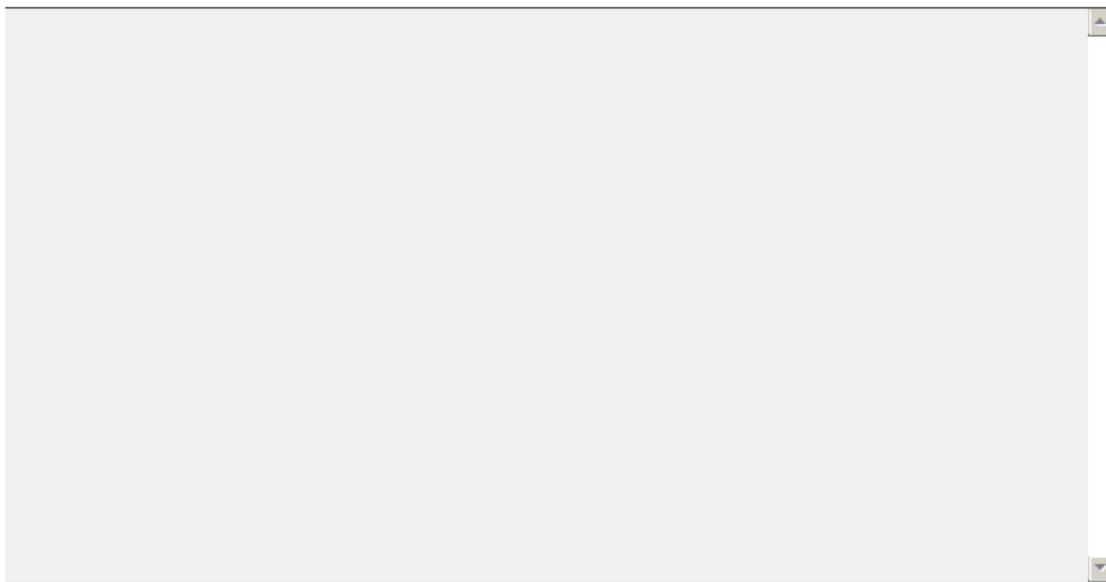
Fylde Local Plan to 2030 - Issues & Options

Q12: Provision of new Tourist Development

Which of the following Options do you support? Please tick all that you support.

- Option A - The approach recommended in the Fylde Visitor Accommodation Study should be followed.
- Option B - The market should decide where new tourist accommodation should be located, providing it follows the guidance set out in the NPPF.
- Option C - An increase in holiday accommodation in rural areas should be supported.
- Option D - An alternative approach should be followed.

If you support Option C, what type of accommodation, scale and location should be supported? If you support Option D, what approach do you suggest? Do you have evidence to support the viability and deliverability of the approach?

A large, empty text input area for providing details on supported options. It is a rectangular box with a light gray background and a thin black border. There are small upward-pointing arrow icons in the top right corner and a downward-pointing arrow icon in the bottom right corner, indicating it is a scrollable text area.

Fylde Local Plan to 2030 - Issues & Options

Q13: Tourism Management

To achieve the development of the 'Classic Resort Concept' at St Annes and promotion of a high quality tourism offer which also serves the local community, which aspect of tourism management do you think should be prioritised? Please rank from 1 to 6 (with 1 being the option you would prioritise most and 6 being the one you would prioritise least).

	1	2	3	4	5	6
Option A - Protect existing and provide additional indoor facilities and attractions.	<input type="radio"/>					
Option B - Enhance the night time economy.	<input type="radio"/>					
Option C - Capitalise on existing tourism assets, such as sporting and cultural events and heritage assets.	<input type="radio"/>					
Option D - Expand the business related trip market, such as conference facilities.	<input type="radio"/>					
Option E - Develop the Ribble Coast and Wetlands Regional Park.	<input type="radio"/>					
Option F - Enhance public realm and open space.	<input type="radio"/>					

For Option A and B please state what type(s) of facilities and attractions are required, at what scale and where they should be located.

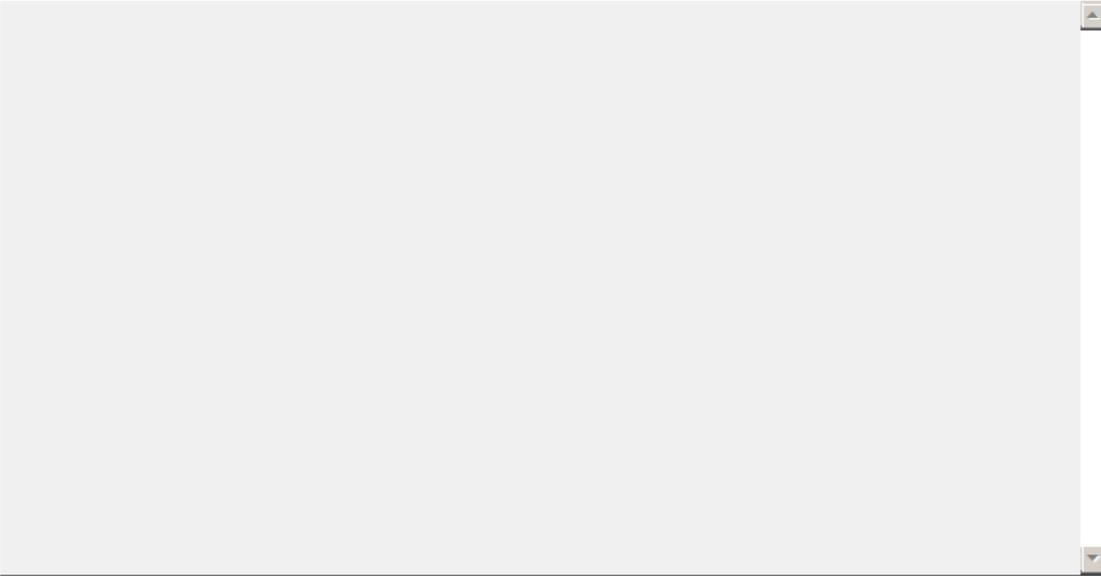
Fylde Local Plan to 2030 - Issues & Options

Do you have any other suggestions?

Yes

No

If yes, please explain.

A large, empty text input area with a light gray background and a thin border. It contains no text, only a small scroll bar on the right side.

The Policy Options - Climate Change, Renewable Energy and Flood Risk

Fylde Local Plan to 2030 - Issues & Options

Q14: Managing Climate Change

Which of the following do you think should be prioritised for mitigation and adaption to climate change in the borough? Please rank from 1 to 5 (with 1 being the option you would prioritise most and 5 being the option you would prioritise least).

	1	2	3	4	5
Option A - Focus development in sustainable locations to reduce the need to use private cars, in order to reduce carbon emissions.	<input type="radio"/>				
Option B - Encourage the reuse and conversion of existing buildings and structures.	<input type="radio"/>				
Option C - Improve the energy and water efficiency of existing and new buildings.	<input type="radio"/>				
Option D - Adapt the design and orientation of buildings in order to prioritise solar gain and/or provide shelter from the elements; take advantage of natural light and ventilation; use grey water and rainwater; provide collection and storage for waste and recyclables.	<input type="radio"/>				
Option E - Prioritise addressing the impacts on flora, fauna and	<input type="radio"/>				

Fylde Local Plan to 2030 - Issues & Options

sensitive habitats
in the borough.

Do you have any other suggestions?

Q15: Development of Renewable and Low Carbon Energy Sources.

Which of the following approaches to the development of renewable and low carbon energy sources do you support?

- Option A: The Local Planning Authority identifies suitable areas for renewable and low carbon energy sources and supporting infrastructure, in order to secure the development of these energy sources.
- Option B: The Local Planning Authority does not identify areas and leaves it to the developer to make applications for their preferred areas.

If you support Option A, what type of renewable and low carbon energy sources should it consider and at what scale? What criteria should it use to determine their selection? Are there any particular areas of Fylde that should be identified for renewable and low carbon energy sources?

Q16: Generation of Renewable and low Carbon Energy in New Development

How supportive should planning policy be towards reducing the borough's carbon emissions through the generation of renewable and low carbon energy in new development? Please tick which one of the following options you support.

- Option A - Generally supportive and follow the regional target which means that, where feasible and viable, non residential development above 1,000m² and residential development of 10 or more units should secure at least 10% of their predicted energy requirement from decentralised and renewable or low-carbon sources.
- Option B - More aspirational local targets should be set which exceed the minimum regional targets, aimed at raising the profile of Fylde as a sustainable borough.

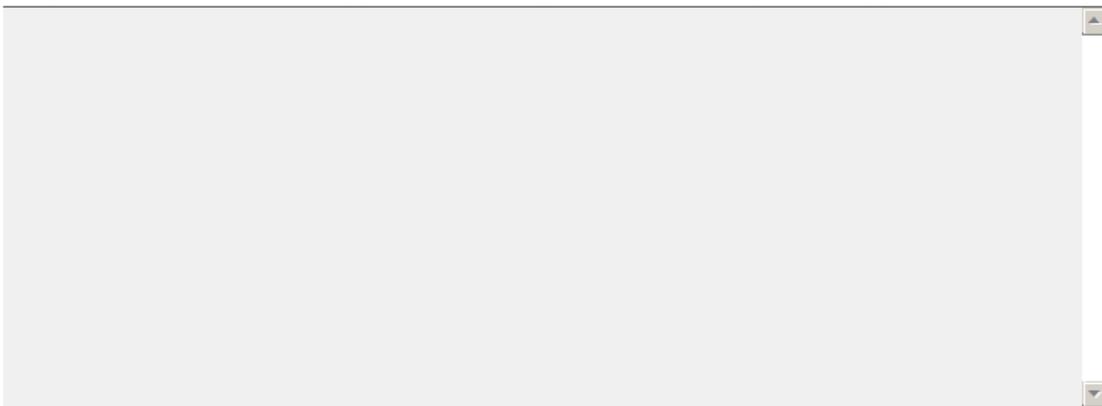
Fylde Local Plan to 2030 - Issues & Options

Q17: Sustainable Building Standards

Should development be required to comply with sustainable building standards and design guidance in order to improve the building's energy and resource efficiency and reduce carbon emissions? Please tick which one of the following options you support.

- Option A - Yes, new buildings should comply with sustainable building standards and design guidance, such as the Code for Sustainable Homes for new build residential and BREEAM for new build non residential.
- Option B - Yes, new buildings (option A) and converted or renovated buildings should comply with sustainable building standards and design guidance, such as Ecohomes for residential conversion or renovations and BREEAM for non-residential conversion or renovations.
- Option C - Development should only have to comply with current building regulation requirements, which are statutory, and should not have to comply with sustainable building standards and design guidance which consider wider sustainability issues.

If you support Option A or B, what standard(s) and level of compliance should be required and do you have evidence to support the viability and deliverability of the approach?



Q18: Reducing surface water to the sewer system

In addition to new development incorporating Sustainable Drainage Systems (SuDS), how else can the amount of water which enters the sewer system be reduced? Please tick which one of the following options you support.

- Option A - New development should be designed so that internal water usage is reduced, for example through the use of water efficient fittings, appliances and water recycling systems, and the incorporation of green roofs.
- Option B - Option A should only be implemented in those parts of the borough that are subject to flooding.
- Option C - New development should only be required to incorporate SuDS.

The Policy Options - The Natural Environment and Heritage

Fylde Local Plan to 2030 - Issues & Options

Q19: Measures to preserve and enhance important wildlife habitats

How can the Council ensure that the measures set out in paragraphs 10.18 – 10.21 of the consultation document are achieved? Please tick which one of the following options you support.

- Option A - New development adjacent to important wildlife habitats should be required to provide contributions towards these measures. (The contributions could be developer contributions or Community Infrastructure Levy).
- Option B - All development should be required to contribute towards these measures.
- Option C - Development should not be required to contribute towards these measures, meaning the Council will need to rely on grant aid becoming available.

Q20: Measures to enhance important areas for green infrastructure

How can the Council ensure that the measures set out in paragraphs 10.41 – 10.44 of the consultation document are achieved? Please tick all that you support.

- Option A - New development adjacent to important areas for green infrastructure should be required to provide contributions towards these measures. (The contributions could be developer contributions or Community Infrastructure Levy).
- Option B - All development should be required to contribute towards these measures.
- Option C - Development should not be required to contribute towards these measures, meaning the Council will need to rely on grant aid becoming available.
- Option D - The Council should be actively engaged in the promotion and improvement of Green Infrastructure.
- Option E - The Council should just protect existing green infrastructure.

Q21: Rural diversification

Please tick which one of the following options you support.

- Option A - The Local Plan should set out what we consider to be an appropriate form of rural diversification and business and industry in the rural economy.
- Option B - The market should decide appropriate rural diversification and business and industry in the rural economy.

If you support Option A, what types of development and rural diversification do you consider to be appropriate, and at what scale?

Fylde Local Plan to 2030 - Issues & Options

Q22: Protection of heritage assets

Please tick which one of the following options you support:

- Option A - Statutory heritage assets such as Listed Buildings and Conservation Areas should continue to be protected.
- Option B - In addition to option A, a local list of important buildings should be developed.

The Policy Options - Infrastructure and Transport

Q23: Approach to infrastructure

Do you agree with the approach to dealing with infrastructure as set out in paragraphs 11.22 and 11.23 of the consultation document?

- Yes
- No

If you ticked 'no', please suggest alternative approaches

Q24: Improvement to public realm

How can the Council ensure that measures to improve public realm are achieved?

Please tick which one of the following options you support.

- Option A - New development adjacent to town centre and identified public realm schemes should be required to provide contributions towards these schemes. (These contributions could be developer contributions or Community Infrastructure Levy).
- Option B - All development should be required to contribute towards these schemes.
- Option C - Development should not be required to contribute towards these schemes, meaning the Council will need to rely on grant aid becoming available.

Fylde Local Plan to 2030 - Issues & Options

Q25: Improving connectivity

How can we ensure that places are properly connected? Please tick all that you support.

- Option A - Ensure new development takes advantage of opportunities to achieve new and improved infrastructure.
- Option B - Ensure new development takes advantage of opportunities for increased usage of existing modes of sustainable transport.
- Option C - Locate development in fewer locations to provide a critical mass to help attract new funding, infrastructure and to support existing infrastructure.

Q26: Encouraging sustainable travel

If you support the strategy to encourage more sustainable modes of travel, please choose which of the following options you support. Please tick all that you support.

- Option A - All new developments should be required to provide high quality cycling and walking facilities.
- Option B - Improved park and ride facilities should be encouraged.
- Option C - The use of the private car should be discouraged by providing high quality public transport alternatives.
- Option D - The use of the private car should be discouraged by operating more restrictive parking standards.

If you support Option B, do you support the idea of a park and ride facility at Kirkham and Wesham station?

- Yes
- No

If you ticked 'no', in which location would you support this facility?

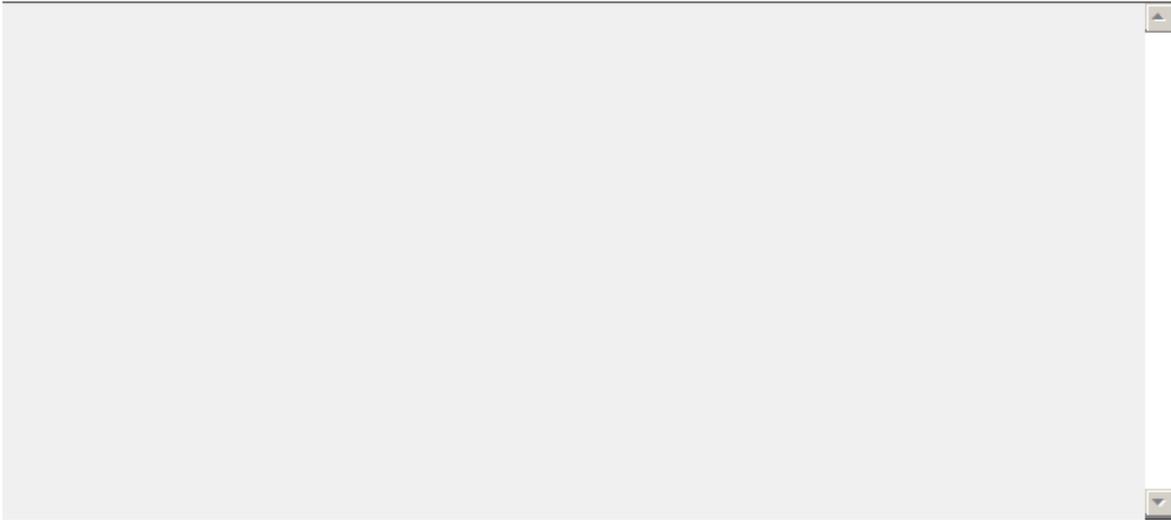
Fylde Local Plan to 2030 - Issues & Options

If you support Option C, do you have any specific suggestions as to how this option could be achieved?

Yes

No

Please explain.

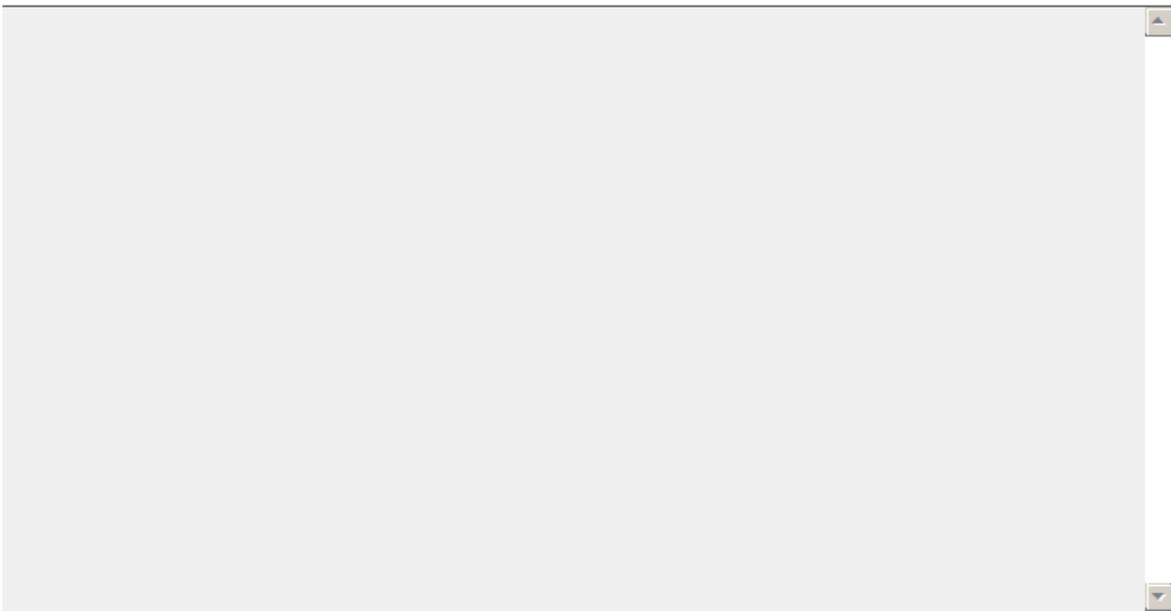


If you support Option D, and you think the parking standards operated by the Council are in need of an update, which particular types of development, or particular standards do you think are in need of revision? The Council's current parking standards are set out in appendix 3 of the consultation document.

Yes

No

Please explain.



Fylde Local Plan to 2030 - Issues & Options

Q27: Reducing the need to travel

If you support the strategy to encourage more sustainable modes of travel, please choose which of the following options you support. You may choose more than one Option.

- Option A - All new development should provide a mix of uses to help reduce the need to travel.
- Option B - New development should be located in areas with existing deficiencies in order to increase the number of facilities reducing the need to travel.
- Option C - Live/work units should be encouraged to reflect the greater numbers expected to work from home.

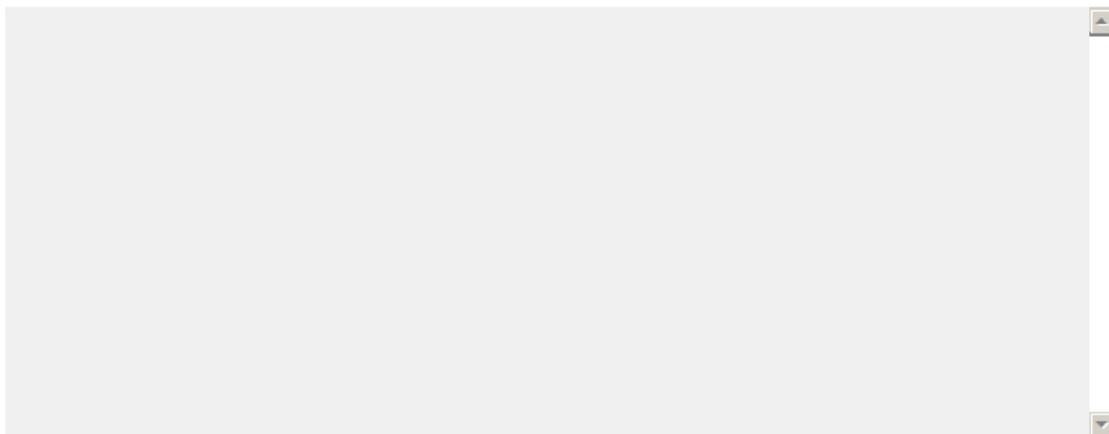
Next Steps

Q28: Development management policies

What Development Management Policies do we need in Fylde? Please limit your suggestions to policies that are not covered by national policies and policies that may be needed because regional policies are being revoked.

- Development Management Policies

Please explain.



Fylde Local Plan to 2030 - Issues & Options

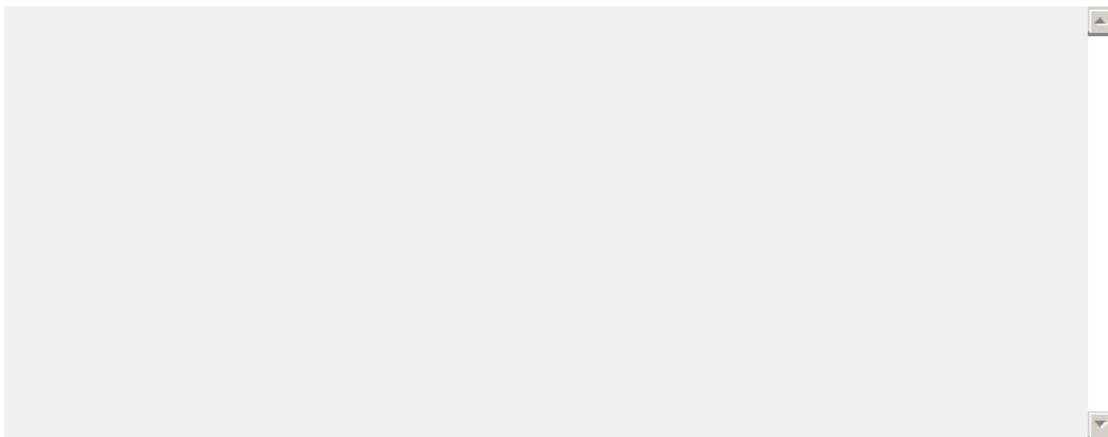
Q29: Local interpretation of national policy

Do we need a Development Management Policy to explain a local interpretation of a national policy?

Yes

No

If yes, what and why?



What to do Next

Fylde Local Plan to 2030 - Issues & Options

Respond by Post

Post your completed questionnaire to:

Fylde Borough Council
Issues and Options Consultation
Planning Policy
FREEPOST BJ952
Town Hall
Lytham St Annes
Lancashire
FY8 1LW

The deadline for consultation responses is midnight on Thursday 19 July, 2012.

Please note the Council cannot guarantee that responses received after the consultation deadline will be considered.

Data Protection

Your contact details will not be released to any third parties and will only be used for the purposes of the Fylde Local Plan. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.

Contact Information

Planning Policy
Fylde Borough Council
Town Hall
Lytham St Annes
Lancashire
FY8 1LW

Tel: 01253 658418
Email: planningpolicy@fylde.gov.uk
Website: www.fylde.gov.uk/localplan/
Fylde Forum: www.fyldeforum.co.uk

Thank you for taking the time to complete this Questionnaire.



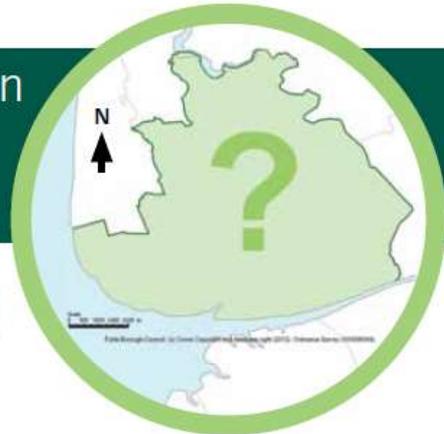
FYLDE BOROUGH COUNCIL

Plan for Fylde - Plan for the Future

Fylde Local Plan to 2030

Issues and Options Consultation

Starts 7th June - Ends 19th July 2012



www.fylde.gov.uk/localplan/

- 5,164 New Homes
- More Affordable Housing
- New Job Opportunities
- Protection of Green Belt
- M55 Heyhouses Link Road
- Open Space
- Flood Risk & Infrastructure
- New Retail Facilities
- Combat Climate Change



Why should you get involved?

The Council is producing a document called the Local Plan to guide development in the borough to 2030. It will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities.

When adopted it will eventually replace the current adopted Fylde Borough Local Plan (As Altered: October 2005) and be used when determining planning applications.

We are keen to seek your views on the key issues and options for planning Fylde's future.

What is the issues and options document?

It sets out 5 alternative spatial options and 28 policy options for the future development of the Borough to address the key policy issues.

The spatial options indicate the percentage of residential development that would be located in different parts of the borough between now and 2030. In relation to retail, Fylde's retail needs study states that 70% of retail will be located in Lytham St Annes, 20% in Kirkham and 10% in the rest of the borough. Employment will be dealt with at a later stage when more up to date evidence is available.

Do you think there are other options?

So far...

In February 2011, we asked you for your thoughts on the key issues for Fylde and where you would like Fylde to be by 2030.

This consultation on the Issues and Options is an important stage in the preparation of the Local Plan. The document is at an early stage and nothing has been decided.



www.fylde.gov.uk/localplan/

Key issues the options will address		
Provide land for 5,164 new homes between 2011 and 2030	Improve infrastructure and facilities .	Diversify the local economy and provide sustainably located employment sites where people live.
Provide affordable and family housing and sites for Gypsies and Travellers .	Protect areas at risk from flooding and from other impacts of climate change .	Address pockets of deprivation
Meet the requirements of an ageing population.	Encourage and support more sustainable modes of transport , including walking, cycling and public transport.	Preserve the distinctive character and heritage of the borough.
Regeneration to support the local economy and tourism .	Provide new retail facilities.	Protect and improve access to open space and the natural environment .

Where have the options come from?

We have only considered realistic and deliverable options based upon the information gathered through the evidence, national planning guidance and what you have told us through the Issues, Vision and Objectives consultation.

An Interim Sustainability Appraisal of the options has been carried out. This is an important tool for helping determine the most sustainable option. It should be read in conjunction with the full consultation document and will help to inform your comments on the options.

Not planning for development is not an option, as this is not sustainable. Failing to provide for development in line with Fylde's assessed development need could lead to unwelcome development on unsustainable sites being approved at planning appeals.

www.fylde.gov.uk/localplan/

What do the five spatial options do?

- Propose the same amount of development, distributed in alternative ways throughout the borough.
- Focus development at or around the main urban areas of Lytham St Annes with variations of focus at other areas.
- Encourage infill development and regeneration in the borough's settlements.
- Require some greenfield and agricultural land to be allocated for housing as there is insufficient brownfield land.
- Protect the Green Belt: we do not propose a strategic review of green belt within the plan period.
- We do not propose further expansion above infill in Freckleton as this would involve a review of the Green Belt boundary around Freckleton.

Option 1:

Focus on Lytham St Annes



What does Option 1 mean?

Lytham St Annes

- 50% of new dwellings
- Maintain and strengthen area
- Create new jobs and training opportunities
- Affordable housing and investment in infrastructure but benefits for the wider borough would be less
- Puts pressure on biodiversity along the coastline

Kirkham, Wesham, Warton and land at junction 4 of the M55 and Squires Gate

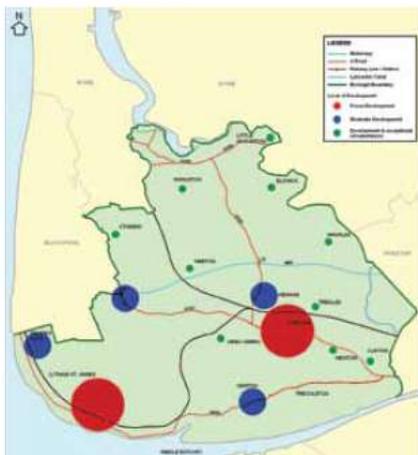
- 45% of dwellings between above named centres and areas
- Maintains the roles of these areas
- Could result in overdevelopment of suburban areas through infill development

All other defined rural settlements

- 5% of dwellings between all defined rural settlements
- Little substantial change
- Potential to overlook rural issues e.g. affordable housing

Option 2:

Equal Focus on Lytham St Annes and Kirkham



What does Option 2 mean?

Lytham St Annes and Kirkham

- 50% of dwellings between Lytham St Annes and Kirkham
- Sustain Lytham St Annes and strengthen Kirkham
- Regeneration, improved retail and services in Kirkham
- Affordable housing and investment in infrastructure
- Development at Kirkham could encroach on other settlements
- Could result in overdevelopment of suburban areas through infill development

Wesham, Warton and land at junction 4 of the M55 and Squires Gate

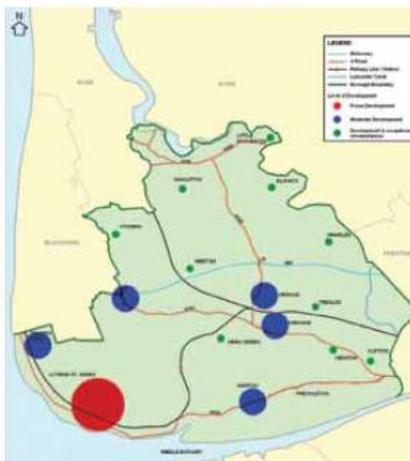
- 45% of dwellings between above named centres and areas
- Strengthen these areas
- Affordable housing and investment in infrastructure
- Improved range of services in Warton
- Could result in overdevelopment of suburban areas through infill development

All other defined rural settlements

- 5% of dwellings between all defined rural settlements
- Little substantial change
- Potential to overlook rural issues e.g. affordable housing

Option 3:

Lytham St Annes and Key and Local Service Centres



What does Option 3 mean?

Lytham St Annes

- 40% of new dwellings
- Sustain area
- Affordable housing and investment in infrastructure.

Kirkham, Wesham, Warton and land at junction 4 of the M55 and Squires Gate.

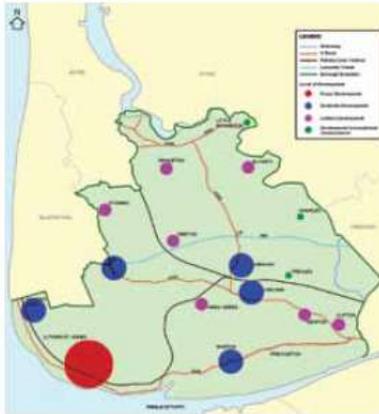
- 55% of dwellings between above named centres and areas
- Strengthen the areas
- Improved range of services in Warton and Kirkham
- Affordable housing and investment in infrastructure
- Could result in overdevelopment of suburban areas through infill development

All other defined rural settlements

- 5% of dwellings between all defined rural settlements
- Little substantial change
- Potential to overlook rural issues e.g. affordable housing

Option 4:

Lytham St Annes and Rural Dispersal



What does Option 4 mean?

Lytham St Annes

- 40% of new dwellings
- Sustain area
- Affordable housing and investment in infrastructure

Kirkham, Wesham, Warton and land at junction 4 of the M55 and Squires Gate.

- 45% of dwellings between above named centres and areas
- Maintain the role of these areas
- Could result in overdevelopment of suburban areas through infill development

Wrea Green, Elswick, Newton, Singleton, Clifton, Staining and Weeton

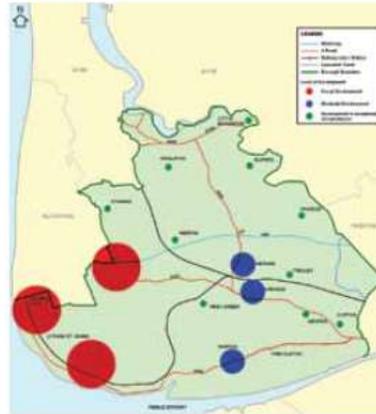
- 13% of dwellings between above named settlements
- Strengthen the areas
- Improve the supply of affordable and family housing
- Improve services, infrastructure and accessibility
- Potential encroachment and disproportionate expansion

All other defined rural settlements

- 2% of dwellings between all other defined settlements
- Little substantial change
- Potential to overlook rural issues e.g. affordable housing

Option 5:

Equal focus on Lytham St Annes and Land on the South East edge of Blackpool



What does Option 5 mean?

Lytham St Annes and land at junction 4 of the M55 and Squires Gate

- 80% of dwellings between Lytham St Annes and land on the edge of Blackpool
- Sustain Lytham St Annes and strengthen land on the edge of Blackpool
- If comprehensive development in a single location occurred it would enable planned and coordinated provision of infrastructure and services
- Greater potential for housing and employment to be located together, but could restrict employment provision elsewhere
- Poor connectivity between land at junction 4 of the M55 and elsewhere in the borough

Kirkham, Wesham and Warton

- 15% of dwellings between above named centres
- Maintains role of areas
- Potential brownfield land at Warton could be overlooked
- Does not provide improved range of services in Warton

All other defined rural settlements

- 5% of dwellings between all defined rural settlements
- Little substantial change
- Potential to overlook rural issues e.g. affordable housing

Infrastructure

Understanding whether there is sufficient infrastructure available (for example transport, energy, water and sewer capacity, school places, parks and open spaces) is one part of the evidence base for the Local Plan. The evidence might show that it will be necessary to phase development so that it coincides with the upgrading or expansion of certain types of infrastructure and this will be considered at the next stage.

What do the policy options do?

Set out a range of alternative options, questions and priorities for the future development of Fylde, set around the key themes of:

- Housing
- Economy and employment
- Transport
- Retail development
- Tourism
- Climate change
- Renewable energy
- Flood risk
- Landscape and biodiversity
- Heritage and culture
- Rural economy and Green Belt
- Infrastructure

The policy options are set out in the full consultation document.

View the full document

The full document including all options is available on the Council's website, at Fylde Direct at St Annes or libraries across Fylde Borough

Comment online

The easiest and quickest way to complete the questionnaire

There are a number of ways you can comment on the document. The questionnaire and further information can be found on the Council's website, at Fylde Direct at St Annes or libraries across Fylde Borough.

www.fylde.gov.uk/localplan/



Next Steps...

The "preferred options" document will be the next public consultation on the Local Plan. It will detail Fylde's future development strategy by narrowing the options down to a single choice which may be a combination of the most sustainable, appropriate and deliverable aspects of the different options. It will be informed by comments on the current consultation, updated evidence including infrastructure constraints and the findings of the Interim Sustainability Appraisal.

Maps : © Crown Copyright and database rights (2012).
Ordnance Survey (100006084)

Design & Print Centre, Preston City Council GRA01365

If you would like to be added to the Register of Consultees to be kept informed of progress on the Local Plan, please contact the Planning Policy team with your contact details. If you are already registered and your contact details have changed, please also inform us.

This and other Local Plan documents will be made available on request in large copy print, audiocassette, Braille or languages other than English. All requests for Local Plan documents in different formats should be made in the first instance to the Planning Policy Team. The Council will meet the cost of any reasonable request for providing this service.



FYLDE BOROUGH COUNCIL

For further information, please contact the Planning Policy Team:

Planning Policy
Fylde Borough Council
Town Hall
Lytham St Annes
FY8 1LW

Tel: 01253 658418

Email: planningpolicy@fylde.gov.uk

Fylde Forum: www.fyldeforum.co.uk

www.fylde.gov.uk/localplan/



Unique Ref No.

Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 31st May 2012

Dear Sir/Madam,

FYLDE BOROUGH LOCAL PLAN ISSUES AND OPTIONS CONSULTATION IN ACCORDANCE WITH REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

I am writing to inform you that the Fylde Local Plan to 2030 Issues and Options will be published for consultation along with accompanying information during the 6 week period 7th June to 19th July 2012.

The Council is developing a document called the Local Plan to guide development in the Borough to 2030. It will ensure required new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. This is an important stage in the preparation of the Local Plan. The Issues and Options paper sets out 5 alternative spatial options and 29 policy options for the future development of the Borough.

For example, it presents five different ways of distributing new homes throughout the borough.

Community Engagement Events – Where to find Us:

Date	Venue	Time
11th June	Lytham – Lytham Assembly Rooms, Dicconson Terrace, FY8 5JY	3pm – 7pm
12th June	St Annes - United Reformed Church Hall, Clifton Drive North, St Annes, FY8 2AE	3pm – 7pm
13th June	Warton - Warton Village Hall, Church Road, PR4 1BD	3pm – 7pm
18th June	Kirkham - Kirkham Community Centre, Mill Street, PR4 2AN	3pm – 7pm
20th June	Elswick - Elswick Village Hall, Roseacre Road, PR4 3UD	3pm – 7pm
21st June	Staining - Staining Village Hall, Chain Lane, FY3 0DD	3pm – 7pm

Date	Community Engagement Bus	Time
12th June	Wrea Green - Outside the Post Office, PR4 2NE	10am – 12noon
12th June	Weeton - Car Park, Weeton Village Hall, Knowsley Crescent, PR4 3ND	1pm – 3pm
13th June	Squires Gate - Morrisons Car Park, Squires Gate Lane, FY4 2AY	11am – 2pm
14th June	Newton - Car Park, Newton Village Stores, Bryning Lane, PR4 3RN	1pm – 3pm
15th June	Wesham - Car Park, Wesham Community Centre, Church Road, PR4 3DQ	10am – 12noon
15th June	Singleton - Car Park, The Miller Arms, FY6 8LL	1pm – 3pm
19th June	St Annes - Car Park, The Square, St Annes Road West, FY8 1RN	11am – 2pm
22nd June	Andsell - Car Park, Outside Post Office, Commonsides, FY8 4DJ	10am – 12noon
22nd June	Freckleton - Tom's Croft Car Park, off Preston Old Road, PR4 1PA	1pm – 3pm

The Issues and Options paper and Sustainability Appraisal will be available to view at www.fylde.gov.uk/localplan/ and also at Fylde Direct and at libraries throughout the Borough for the duration of the consultation. Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

You can send your comments in a number of ways:

- Complete the online questionnaire at www.fylde.gov.uk/localplan/
- Email an electronic copy of the questionnaire to planningpolicy@fylde.gov.uk
- Freepost a questionnaire to Fylde Borough Council, Issues and Options Consultation, FREEPOST BJ952, Town Hall, Lytham St Annes, FY8 1LW
- Message to Fylde Forum www.fyldeforum.co.uk

The deadline for submitting comments is **Thursday 19th July 2012**.

If you require any further assistance regarding any of these matters, please do not hesitate to contact the Planning Policy Team on 01253 658418, or email planningpolicy@fylde.gov.uk

Please note that all comments must be submitted in writing and must contain your name and address. Comments cannot be treated as confidential. All comments will be published on our website though we will take care not to publish any personal details. We will take your comments into account in preparing the next version of the plan

You are receiving this consultation letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters and/or the contact details we have are incorrect please let us know either by phone 01253 658418 or email planningpolicy@fylde.gov.uk.

Yours faithfully,



Julie Glaister
Planning Policy Manager

Town Hall, Lytham St. Annes, Lancashire, FY8 1LW
Telephone: 01253 658658 Fax: 01253 713113 Web: www.fylde.gov.uk

Appendix 4

Issues and Options 2012: Consultation Responses

Fylde Local Plan to 2030: Issues and Options consultation

**Statement of Consultation – Part 2: Summary of Comments Received
and Council's Response**

October 2012

This report is structured in parallel to the chapters in the Fylde Local Plan to 2030: Issues and Options consultation document.

Contents

1.0	Chapter 1: The Plan Process	p2
2.0	Chapter 2: Spatial Portrait of Fylde and Key Issues	p4
3.0	Chapter 3: A Vision for Fylde to 2030	p6
4.0	Chapter 4: Strategic Objectives	p8
5.0	Chapter 5: Spatial Options for Development	p10
6.0	Chapter 6: Implications of the Spatial Options	p13
7.0	Chapter 7: Provision of Homes in Fylde	p20
8.0	Chapter 8: The Fylde Economy	p37
9.0	Chapter 9: Climate Change, Renewable Energy and Flood Risk	p48
10.0	Chapter 10: The Natural Environment and Heritage	p61
11.0	Chapter 11: Infrastructure and Transport	p72
12.0	Chapter 12: Development Management	p84

1.0 Chapter 1: The Plan Process

1.1 Consultation Responses

There were 11 responses submitted by letter and email on the Plan Process, raising a number of issues including the length and perceived complexity of the Issues and Options document. A summary of the other issues raised is provided below.

1.2 Summary of comments on the Plan Process

Under the Duty to Cooperate introduced under the Localism Act, Lancashire County Council recommends that it should be involved on a formal basis as the Plan is taken forward on issues such as economic development and infrastructure provision.

Wyre Borough Council also comments that, in order to comply with the Duty to Cooperate, Fylde, Blackpool and Wyre Councils should collectively discuss a variety of matters further including Gypsy and Traveller needs, infrastructure requirements (particularly in relation to wastewater), traffic modelling, employment land and housing.

The Environment Agency points out that some documents are not included in the list of evidence within the document, including the Integrated Catchment Plan for the Ribble, the Water Cycle Strategy for Blackpool and Central Lancashire – Halcrow (April 2011) and the North West River Basin Management Plan. The Agency strongly recommends the inclusion of these documents in the evidence base within the document and the list on the Council's website.

The CPRE also points out that, with regard to the evidence base, relevant up-to-date economic studies were not available to influence the Issues and Options document. They state that these should inform all the options, not just the 'development of the Preferred Option'. The CPRE questions the economic studies set out as evidence in the Issues and Options document and points out that the Economic Development Strategy and Action Plan 2012 -2030 was actually published for consultation on 5 July. They state that the Employment Land and Premises Study (2012) is referenced by the Economic Strategy, but that it is understood that it was not actually completed or published. In addition, they state that the Warton Enterprise Zone and Master Plan should be included as evidence.

BAE Systems comment that the Local Plan should provide a flexible framework to meet the needs of BAE Systems and those employers that will have an interest in locating to the Warton Enterprise Zone. BAE consider that the Council should speed up the process of adopting the Local Plan, in order to ensure consistency with the NPPF and to provide for greater certainty.

English Heritage questions what evidence has been used to identify the environmental characteristics of the area and how the historic environment has been covered. They question whether the borough's ten Conservation Areas have Conservation Area Appraisals and, if not, whether a programme has been put in place to do so, together with the duty to designate and review conservation areas from time to time.

1.3 Council's Response

It should be noted that reference throughout the document to the 'Council's Response' relates to officer views that have been agreed by Members.

The Council welcomes the comments received on the Plan Process and accepts that, under the Duty to Cooperate, the neighbouring authorities of Wyre, Blackpool, other local authorities and the County Council should be involved in a number of strategic cross boundary issues as the Plan moves forward. A Memorandum of Understanding between the Fylde Coast authorities is in the process of completion.

Comments relating to the evidence base are taken on board and reference to the environmental studies referred to, the Warton Enterprise Zone and the Employment Land Study 2012 will be referred to in the summary list of evidence that will inform the Preferred Options document.

Conservation Appraisals have not yet been completed for the borough's ten Conservation Areas but the Council hopes to commence work on a Heritage Strategy, followed by the preparation of Conservation Area Appraisals, a Management Plan and the publication of a 'local list'.

1.4 Preferred Option

The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

2.0 Chapter 2: Spatial Portrait of Fylde and Key Issues

2.1 Consultation Responses

There were 9 responses submitted by letter and email on the spatial portrait and key issues.

2.2 Summary of comments on the Spatial Portrait and Key Issues

The Environment Agency stated that bathing water quality should be considered as a key issue affecting the whole of the Fylde coast. They also state that the following should be considered as additional issues: Impact of Kepak and Clifton Marsh landfill (i.e. noise and odour); water quality; groundwater; biodiversity – particularly in terms of water voles and great crested newts, which are protected species; and shale gas.

Blackpool Council state that the sub-regional significance of Blackpool Airport and lands at Whitehills on the Fylde coast economy needs to be recognised and that the implications of the capacity of the sewer network on bathing water quality and tourism should be expanded. They ask that if broadband is to be rolled-out to 97% of the borough by 2014, would this not overcome the issue of poor broadband connection at Whitehills? They state that further housing approvals at Whitehills need to be discussed further through the Duty to Cooperate, as the location has sub-regional importance for business and industrial employment.

The CPRE disagree with the statement in paragraph 2.52 that “agriculture is in decline.” They state that agriculture remains an important part of the local economy and that the Plan must support this. They highlight that the Economic Development Strategy states on page 73 that the agricultural economy is economically viable.

Mactaggart and Mickel state that the map on page 21 of the consultation document should incorporate the flood risk areas to provide a comprehensive view of the constraints affecting the borough.

BAE Systems make the assumption that the constraints referred to in paragraph 2.31 refers to potential development. In relation to paragraph 2.33, they state that the Plan should provide a flexible framework that can maximise the opportunities that will arise through the restructuring of BAE and the Enterprise Zone for the benefit of the local community, businesses / employers and the environment.

Friends of the Earth state that shale gas exploration and development should be a key issue, as this would potentially have huge impacts on rural areas, tourism, farming and quality of life. A couple of respondents stated that the Plan should take a wary approach to the shale gas industry, with one referring to potential detrimental effects on tourism, agriculture, health, properties, climate change, excessive water use and additional traffic.

A resident from Great Plumpton stated that land at Junction 4 of the M55 and SE of Blackpool should be referred to as “land NW of Westby-with-Plumptons.”

2.3 Council's Response

Whilst there may be potential noise and odour from Kepak and Clifton Marsh Landfill Site, this is not considered so significant as to be included as a key issue. In terms of water quality, the Council will have regard to paragraphs 109, 120 and 121 of the

NPPF and also the North West River Basin Management Plan when developing policies for the Preferred Options. The Council will also take account of groundwater considerations. The Council acknowledge the presence of water voles and great crested newts in the borough, and measures the Plan can use to protect these will be considered as the Preferred Options are developed. The Council is preparing a Biodiversity Audit which will be an informative piece of evidence in this regard. The Council will consider including this as a key issue or characteristic. Bathing water quality will be considered as an issue affecting the whole of the Fylde coast.

Planning controls over mining operations (shale gas) are administered by Lancashire County Council's Minerals and Waste Planning Department. In determining applications for mineral extraction, Lancashire County Council has to ensure that operators meet the requirements of planning legislation governing the appropriate use of land. Nevertheless, shale gas will be considered as an issue due to the potential effects on Fylde and the sub-region.

The sub-regional significance of Blackpool Airport and Whitehills on the Fylde coast economy will be more explicitly stated in the Preferred Options, and the implications of poor bathing quality will be expanded when setting out the key issues and characteristics. Poor broadband connectivity at Whitehills will not be included as a key issue as the roll-out of superfast broadband across 97% of the County will likely resolve this issue. The Council will continue to engage with Blackpool as part of the Duty to Cooperate, in relation to future development at Whitehills. The Council agrees that Whitehills has sub-regional importance for business and industrial employment.

Whilst agriculture remains an important part of the local economy and a main industry employer, the national picture shows that it is in decline. In relation to the constraints map on page 21 of the consultation document, the Council agrees that it would be desirable to have the principle constraints to development on one map. However, when the consultation document was prepared, such a map proved illegible at the scale set out in the document. Therefore, a separate map showing the flood zones was put in the flood risk section on page 117 of the consultation document. When referring to constraints in the text of the document, the Preferred Options will make it more explicit that this is referring to constraints to future development.

The approach in terms of maximising the potential associated with the Enterprise Zone at Warton will be set out in the Employment / Economy section of the Preferred Options document.

In relation to land at Junction 4 of the M55 and SE of Blackpool, the Council will continue to use these terms as they are more recognisable to stakeholders unfamiliar with the area than "land NW of Westby-with-Plumpton."

3.0 Chapter 3: A Vision for Fylde to 2030

3.1 Consultation Responses

There were 6 responses submitted by letter and email on the Vision for Fylde.

3.2 Summary of comments on the Vision for Fylde

Blackpool Council commented that they would welcome the recognition of the value of existing assets (such as British Aerospace, Whitehills and Blackpool Airport) to the sub-region as well as their importance in developing a distinctive image of the borough.

The National Trust considers that the Vision is lacking a heritage dimension. They state that despite references to various environmental assets, the only reference to heritage is limited to the fact that the settlements will have retained their individual identities and built heritage. They therefore state that an approach based on safeguarding and enhancing heritage would be more appropriate. The National Trust suggest that a paragraph in the Vision committing to the protection, enhancement and promotion of heritage assets and their wider role as distinctive features be included.

The Environment Agency recommends that paragraph 3.12 of the Vision is amended to include the protection and enhancement of bathing water quality.

BAE Systems believes that there is considerable potential to enhance the existing collection of retail and community facilities in Warton, with the potential of additional land. They state that this would help to create a centre for Warton that would have a range of facilities to accommodate the needs of the local residents and working populations.

Commercial Estates Group also supports the Vision for Fylde, stating that it recognises the importance of the role of settlements, including Warton, as a service centre for nearby major employment and its rural hinterland. They support the recognition that the balance between employment and housing opportunities in Warton should be addressed through the Local Plan.

Mactaggart and Mickel support the Vision in principle. However, given the housing need and requirements in the borough and the requirements of the NPPF, they consider that an unequivocal undertaking could also be provided as an additional statement in the Vision.

3.3 Council's Response

The Council welcomes the comments received on the Vision for Fylde and accepts that it would benefit from the inclusion of references to assets including BAE Systems and Blackpool Airport and reference to protection, enhancement and promotion of heritage assets and protection of bathing water quality.

It also accepts the comments in relation to Warton, which will be addressed in the Preferred Options document.

Although there is a need for housing in the borough, an unequivocal undertaking would be inappropriate, particular due identified constraints in the borough and the need for a balanced approach to development.

4.0 Chapter 4: Strategic Objectives

4.1 Consultation Responses

There were 10 responses submitted by letter and email on the strategic objectives.

4.2 Summary of comments on the Strategic Objectives

Lancashire County Council considers that the objectives for promoting sustainable economic growth, improving roads and transport and protecting and improving the environment are of paramount importance.

The Environment Agency supports Objectives 1 and 2. With regard to part 4 of Objective 1, they support the re-use of brownfield sites subject to appropriate site investigation and remediation where required.

Blackpool Council would welcome the recognition of bathing water quality in Objective 2.

BAE Systems believe that the document should have provided the 'core indicators' for monitoring how the vision and objectives were being delivered. For Objective 1, they agree that previously developed sites should be used in preference to greenfield sites. They also believe that a responsive and flexible supply of housing land should be brought forward to meet identified and agreed housing requirements. BAE Systems believe that Objective 4 should refer to the importance of the Enterprise Zone as a means of achieving economic growth and diversification. They highlight that Point 5 of Objective 4 refers to 'British Aerospace' and that this should be amended to 'BAE Systems.'

The CPRE points out that there is no mention of support for and protection of agricultural and farming operations in the Key Issues and Objectives.

Sainsburys support Objective 3, which they state is in line with the NPPF's promotion of sustainable communities, and they support the broad aims of Objective 4, subject to the objective being amended to acknowledge that locating development within existing centres may not always be achievable.

Commercial Estates Group points out that it is important that the policies in the emerging plan reflect the strategic objectives, whilst also having regard to the evidence base in terms of the need to plan positively for growth, marry areas of opportunity and need and recognise the role different settlements have in local communities. They consider that the presumption in favour of sustainable development should be referred to in the draft plan.

The Duchy of Lancaster's Salwick Estate is the main focus for their representations. Therefore, they state that agriculture, rural diversification, employment and ensuring housing need is met should be the key strategic objectives for the Plan. Although they have some support for Objective 1, they state that there is concern that it could lead to under-delivery of development, as some brownfield sites are currently unviable. They add that the Council should prepare for more greenfield sites coming forward that are deliverable. They also state that the rural settlements require some growth to help sustain them as, without it, there could be closure of local businesses and a greater need for travel and increasing car use.

The Council's Director of Community Services commented that Objective 4 should refer to developing a vibrant cultural and creative community that will drive economic growth, attract inward investment, develop skills and innovation, create and sustain jobs, support regeneration and contribute significantly to place making and regional tourism. The director considers that the following should be added to Objective 5: 'To develop socially cohesive, diverse and healthy communities by Investment in existing and the provision of new formal sports facilities across the borough.'

4.3 Council's Response

The Council welcomes the comments received on the strategic objectives, which are noted and will be addressed in the Preferred Options document. The CPRE comments relating to addressing the importance of agriculture within the strategic objectives will be addressed.

The Local Plan will set out core indicators for monitoring the delivery of policies in the Plan and how progress on implementing the Plan will be achieved as part of the Preferred Options document.

5.0 Chapters 5: Spatial Options for Development

The comments below, along with Council's Response, relate to the settlement hierarchy which is set out in chapter 5 of the Issues and Options document. Comments specifically in relation to the spatial options are set out in section 6.0 of this appendix.

5.1 Consultation Responses

There were 5 responses submitted by letter and email on the settlement hierarchy.

5.2 Summary of comments on the Settlement Hierarchy

The CPRE question why the sustainability scores include population, and state that sustainability is independent of population. They also state that the definitions of levels one to five of the hierarchy should not identify the levels of development, and that this is the role of the spatial options.

Mactaggart and Mickel are generally supportive of the settlement hierarchy.

BAE Systems believe that there should be only three tiers within the hierarchy, as follows: 1) Primary Service Centre – Lytham St Annes; 2) Key Service Centres – Kirkham, Wesham, Warton and Freckleton; 3) Rural settlements. They state that this hierarchy would acknowledge the spatial relationships between Kirkham and Wesham, and Warton and Freckleton, and that it acknowledges the significant population (both resident and working) of Warton and the potential land availability arising out of the Enterprise Zone and the restructuring of the Aerodrome.

The Save Wrea Green Action Group state that there is no explanation as to why the various levels of population have been used, and it is unclear whether the figures are total population or just adults. They also state that it is unclear why the population score is added to the accessibility evaluation. They ask that if a location had a small population and a primary school, wouldn't the Council look towards a larger population in that location to support the school?

The Save Wrea Green Action Group continue by stating that it is unclear why only certain aspects of the accessibility schedule in the RSS have been included. For example, access to a bank is not included in the hierarchy. They also state that it is unclear what percentage of a given population must be able to access facilities within a ten minute walk. In relation to post offices, they state that there is a considerable difference between the facilities of a post office and a sub-post office.

They continue by stating that the definition of community facilities is not clear. For example, the Wrea Green Institute is a Members Only Club with an annual subscription, and other facilities such as the school hall are only available for rent. They state that the community facilities in the hierarchy therefore seems to apply to any rentable facility and is therefore unlikely to be regarded as a true community facility.

In relation to open space, they state that the hierarchy does not define a comparable size or positioning. They also state that where a location only has one primary school with limited capacity, then this should be taken account of in the hierarchy, as should the last upgrade of the sewer system for each settlement by date / added usage,

given the cause of the recent flooding in Croston. They finally state that poor mobile phone signal and access to high speed broadband are further accessibility issues.

Treales Roseacre & Wharles Parish Council request that Roseacre be recognised as a settlement in the settlement hierarchy, and that when assessing Roseacre, the nearby community facilities, school and open space should be considered in the scoring.

5.3 Council's Response

In the defined settlement hierarchy on page 34 of the consultation document, the Council considers it appropriate to set out the role of the settlements in each tier, including an indication of the amount of development that could take place, as paragraph 5.20 states that the settlement hierarchy underpinning the five options indicates in broad terms the amount of development appropriate to each part of Fylde.

In consideration of the comments from BAE Systems, it is not the Council's current intention to amend the number of tiers in the settlement hierarchy. However, the position of Warton and the Enterprise Zone will be considered carefully as the Local Plan is progressed.

In relation to population, the scoring is considered logical given the actual resident population of each settlement. For example, Kirkham and Lytham are in the same broad population band and are therefore grouped at the same tier in the population scoring. St Annes has a considerably higher population and is therefore placed in the tier above. It could be argued that Wharles, Treales and Little Eccleston should be grouped separately in a sixth tier given that they each have a very small population in comparison to the other rural settlements. However, a maximum scoring of '5' has been given for all the criteria with the biggest influence on the position of the settlements in the hierarchy, one of which is population. This makes it difficult to put Treales, Wharles and Little Eccleston in a sixth category, and it was not considered appropriate to give them a score of '0' on the basis of them having the lowest population.

Size of settlement is a highly significant factor in deciding where a settlement should be located in the settlement hierarchy, and it was considered that population would be the most effective way of assessing this. The higher up a settlement is in the hierarchy, the greater the amount of development that would be expected for such a settlement. Also, as an example, 500 new dwellings over the Plan period at a settlement at the top of the hierarchy would have much less impact than 500 dwellings across a settlement at the bottom of the hierarchy. Therefore, population has been included in the scoring and criteria in addition to the accessibility criteria. Issues such as school capacity and other infrastructure issues are being dealt with in the Infrastructure Delivery Plan, a draft of which will be available at the Preferred Options stage.

It is not considered appropriate to include all the criteria in the RSS accessibility scoring. The purpose of the criteria and scoring in the RSS is to assess the accessibility of individual proposals for employment and residential development to services and facilities, which is different to the purpose of the settlement hierarchy. The consultation document has included 14 scoring categories covering a range of themes that are considered sufficient for the purposes of the settlement hierarchy. Adding bank/ATM access, pub access etc would have little impact on the scoring,

given that the spectrum of categories is much wider than the RSS accessibility and scoring.

Easy access was measured from the centre of the settlement. The percentage of the population that must be able to access facilities within a ten minute walk is therefore irrelevant for the purpose of the settlement hierarchy, and would vary with the size and density of each settlement.

Rural villages with access to a post office which also incorporates a shop are considered in the scoring to have access to both a post office and a local store.

The term 'community facility' in the context of the settlement hierarchy refers to an indoor community facility where a room (or rooms) can be hired for community functions e.g. bingo, yoga etc, and that can also be hired for private use e.g. wedding reception. Such buildings are typically village halls and community centres. The Wrea Green Institute was included as a community facility in the criteria and scoring. However, it is noted that this is a Members Only Club. Therefore, the criteria and scoring will be amended so that this is not considered as a community facility. Therefore, Wrea Green would have an amended score of '20', although this would have no impact on its position within the settlement hierarchy.

Easy access to open space refers to 'Public Open Space,' 'Recreational Areas,' and 'Open Space within Towns and Villages,' as designated in the Fylde Borough Local Plan. These types of open space have been chosen because they are areas of outdoor recreation that are accessible to the general public. Some settlements have only one area of open space, whilst other settlements may have several areas of open space. To differentiate between these settlements, a category was added to the scoring that gives extra weight to settlements with more than one area of open space.

The criteria and scoring does not consider infrastructure capacity issues, such as sewerage issues. However, infrastructure capacity is a vital consideration and infrastructure considerations will be set out in detail in the Infrastructure Delivery Plan which is currently being prepared and will be made available when consultation takes place on the Preferred Options.

The Council will consider whether Roseacre should be included in the settlement hierarchy. If included, the Council will consider whether the facilities referred to fit in with the methodology set out in the Parish Council's Response for devising the scoring.

6.0 Chapter 6: Implications of the Spatial Options

The comments set out in this section relate to both chapters 5 and 6 of the Issues and Options document.

Q1: Spatial Options	
Which one of the alternative spatial options set out in Chapter 5 do you support? The Preferred Option may be a combination of the most sustainable aspects of more than one option.	
Option 1	Focus on Lytham St Annes
Option 2	Equal focus on Lytham St Annes and Kirkham
Option 3	Lytham St Annes and Key and Local Service Centres
Option 4	Lytham St Annes and rural dispersal
Option 5	Equal focus on Lytham St Annes and land on the SE edge of Blackpool
Option 6	A further alternative spatial option. Please explain how this option would achieve the Plan's Vision and Spatial Objectives

6.1 Consultation Responses

There were 240 responses to this question. 161 responses were submitted using the questionnaire. Of these responses, 51 supported Option 2, 40 supported Option 5, 30 supported Option 1, 17 supported Option 4, 16 supported Option 6 and 7 supported Option 3.

80 responses were submitted by letter and email. Of these 14 supported Option 5, 10 supported Option 2, 7 supported Option 4, 6 supported Option 1, 6 supported Option 6 and 4 supported Option 3. 32 respondents provided other comments in response to this question.

Overall the majority of support was for Options 2 and 5 and the least support was for Option 3. 22 respondents supported an alternative spatial option which included some aspects of the other five options.

6.2 Summary of comments on the Spatial Options

Option 1

Some respondents supported this option as they considered it to be based on well established infrastructure, public transport, an international airport and available brownfield and infill sites. However, others did not support it as they considered growth in this area alone could lead to further disparity between Lytham St Annes and the rest of Fylde.

Some respondents stressed that Lytham St Annes is significantly constrained and that the option has the potential to result in unbalanced and unsustainable growth

patterns. They considered that a more even distribution of development across all settlements is appropriate in order to ensure the vision for Fylde is delivered and seen as achievable.

The Windmill Group questioned the fact that the document refers at paragraph 6.5 to Queensway and two Heyhouses sites as the only real development opportunities within Lytham St Annes. They state that they have developable sustainable land to the west of Ballam Road and north of Laburnum Avenue, both of which are outside a flood risk area.

Option 2

This option was supported by a number of respondents. It was considered that, as the majority of new development would be concentrated in Lytham St Annes and Kirkham where there is sufficient infrastructure, this would be the most sustainable option. Some respondents added that a focus on these areas should not prevent sustainable development coming forward in other settlements.

There was some objection to Option 2. Respondents stated that, as Wesham is linked geographically to Kirkham, the recognised conurbation of Kirkham / Wesham would take 65% or more development with this option, having a major impact on infrastructure and services and encouraging urban sprawl and loss of greenfield land.

Option 3

There was some support for Option 3 because it was considered that this is the only option that will allow growth in all Fylde Local Centres.

However, some respondents did not support this option as it was considered that it would spread the burden of development across the whole of Fylde and ignore the potential of certain areas (e.g. J4 of the M55) that could potentially withstand large scale development.

Option 4

Some respondents considered that, as Fylde is predominantly a rural borough, there should be some provision for rural dispersal as set out in this option. Comments stated that this would address rural isolation and social exclusion by supporting rural services and providing infrastructure. As Lytham St Annes is physically constrained, it was considered that development should be dispersed throughout the borough.

However, there was some opposition to this option as it was felt that it misses the potential of large scale sites and would burden small rural communities, creating infrastructure issues in the key and local service centres.

Option 5

There was support for Option 5 as it was considered that it would take the pressure off rural areas inland. However, it was noted that the area around Peel has drainage problems and infrastructure and services would need to be addressed in a timely and coordinated manner for this option to be deliverable.

The Homes and Communities Agency (HCA) noted that, although most of the spatial options allow some development at J4 of the M55 / Squires Gate, Option 5 is most closely aligned with the intent of the Fylde Coast Local Investment Plan.

Kirkham Town Council supports this option as it considers it will enable a planned and coordinated provision of infrastructure and services.

Woodplumpton Parish Council supports option 5 and would be opposed to any major shift in development moving towards Clifton (option 4) and Wharles which would impact on the Preston / Fylde boundary.

Option 6

A number of respondents suggested an alternative spatial option. AFC Fylde felt that consideration should be given to an option with continued focus on Lytham St Annes and a secondary focus on two new strategic growth points at Kirkham / Wesham and junction 4 of the M55. They state that the former would involve building on the largest inland settlement with good road and rail links and the latter providing a cross-boundary growth point to support the aspirations and needs of both Fylde and Blackpool. AFC Fylde state that the three areas would take approximately 85% of the development needs of the borough over the life of the Local Plan (30-35% at Lytham St Annes, 20-25% at Kirkham / Wesham primarily in the first 10 years, 30-35% at junction 4 primarily in the second 10 years), and that the remaining 15% would be split across the remaining settlements, with priority given to Squires Gate and Warton.

The CPRE supported an alternative spatial option based on Option 5 but with more focus on Lytham St Annes than the Blackpool periphery. They state that the percentage of dwellings would be Lytham St Annes 50% and Squires Gate and M55 J4 30%, and that this would ensure maximum use of brownfield land, including potentially redundant employment land, and allow for the recent approval of the Queensway greenfield development. The CPRE add that this option could mean no change to existing urban or rural settlement boundaries and loss of Fylde countryside, other than at M55 J4, and no loss of best and most versatile agricultural land further than that lost by the Queensway development.

Other comments

Natural England commented that most areas of biodiversity interest are along the coast and the expansion of the population of Lytham St Annes and other coastal locations, such as Warton, would put further pressure on these areas for recreational use. Natural England state that other potential effects of the spatial options include impacts on landscape and visual amenity, biodiversity loss, greenfield development and loss of the best and most versatile agricultural land.

Blackpool Council notes that development at the Blackpool boundary is a key issue for both Fylde and Blackpool councils and that there is little reference to implications on Blackpool's infrastructure and services. Blackpool Council also notes that the consultation document states that 'Option 5 would not entail developing land in Fylde to meet Blackpool's development needs' and points out that development of lands around Junction 4 of the M55 and at Whitehills are highlighted as key issues in the emerging Memorandum of Understanding under the Duty to Cooperate. Blackpool Council supports and welcomes ongoing dialogue with respect to the development of land in this area and to agree a mutual way forward.

Blackpool Council suggests that, if growth on the south east edge of Blackpool is identified as the Preferred Option, a joint master planning exercise between Blackpool, Fylde and Lancashire County Council should be undertaken, incorporating the airport corridor and taking account of the housing and employment needs of Blackpool and Fylde and the requirements identified in the Infrastructure Delivery Plans.

Lancashire County Council (LCC) has no overall preference but recognises that Options 1 and 5 most closely represent the identified settlement hierarchy. When determining the Preferred Option they consider that, as Fylde has key economic assets of strategic importance to the whole of Lancashire e.g. the Enterprise Zone (EZ) at Warton and Blackpool Airport, it needs to provide a positive planning approach to enable their sustainable development. They state that the EZ and airport will attract new businesses / investors to Lancashire but that there are also high value / growth businesses in the advanced manufacturing sector which should be enabled to expand locally. LCC consider that a detailed assessment of linkages with Preston should be undertaken, including consideration of strategic development in North West Preston, the need for key transport infrastructure improvements to enable this to take place and implications for wider connectivity in Fylde.

The Environment Agency stressed that sewer capacity is a significant barrier to development in the North West of Fylde and Blackpool, and that the Water Cycle Strategy for Central Lancashire and Blackpool identifies the issues in Blackpool and provides a variety of recommendations. They state that any policies encouraging growth in areas subject to infrastructure capacity problems and potential detrimental impacts upon Bathing Water Quality should include requirements for separation of surface water from the sewer network, in addition to necessary infrastructure improvements.

The Highways Agency welcomes any option that reduces the reliance on private car use, particularly where that use has the potential to negatively impact on the operation of the trunk road network within the borough and in the wider area. They state that where improvements are required to deal with cumulative impact, a mechanism to facilitate this will need to be incorporated into the Plan.

The Duchy of Lancaster considers that the focus for development should not be only in the three major settlements. They suggest that all the settlements should provide new housing and employment where required. However, some local councillors gave a clear message that, overall, their constituents prefer rural areas to remain that way and that the majority of development should be centered on areas with good transport and infrastructure already in place.

The Homes and Communities Agency (HCA) noted that most of the spatial options identify the Kirkham / Wesham area as a location for delivery of new market and affordable homes. They state that this is an area where the HCA has already made significant investment through its National Affordable Housing Programme and its housing stimulus programmes and the HCA accordingly supports this focus.

BAE Systems support the fact that all the options propose development at Warton. Commercial Estates Group considers that each of the five options should promote at least 10-15% of the total housing requirement at Warton. They do not support Option 5 as they consider it fails to recognise the role of Warton as a major source of employment and the opportunity this presents to reduce the need to travel. They consider that, compared to other settlements, Warton is also one of the least constrained by green belt.

Taylor Wimpey UK considers that the Council should provide an assessment of the capacity of Previously Developed Land (PDL) within the borough. They suggest that more detailed options should be provided that define strategic development locations in order to demonstrate that Fylde has the capacity to meet the local housing needs on PDL or other sites. They support more detailed development of Options 2, 3 and 4, as these propose greater distribution of development across the borough. Taylor Wimpey also support development focused at Warton, as this would provide housing to meet needs, ease congestion problems and provide long term sustainability for the rural south of the borough. They support development at Kirkham, as this would ensure investment and infrastructure improvements to secure the sustainability of Kirkham and neighbouring Wesham. Appropriate strategic locations for development within the rural settlements are also supported in order to ensure the long term sustainability of these areas.

North West Commercial Developments Ltd considers that a major focus for development should be Lytham St Annes. They feel that further clarification is required under Option 2 to detail how 50% would be split between Lytham St Annes and Kirkham. They consider that none of the options go far enough to provide the majority of new development within Lytham St Annes, commensurate with its role as the principal settlement within the borough.

Essar Oil UK (formerly Shell) notes that there is no reference to the North West Ethylene Pipeline as either a key constraint or under infrastructure issues. They recommend that consideration is given to including the pipeline as a constraint to usefully inform the land allocations in the emerging development plan. They state that the pipeline is classified by the HSE as a major accident hazard pipeline (MAHP) and is subject to land use planning constraints.

Westby-with-Plumpton Parish Council considers that the Parish should be regarded as a Parish of smaller hamlets and not become an extension of the urban areas of Blackpool or St. Annes. If the Council deems that development is necessary, then it should be in the north/west of the Parish near the boundary of Blackpool, west of the Whitehills employment area. The Parish Council would prefer any development to be considered for the Moss land area, not on prime agricultural land further to the north of the M55. A further concern of the Parish Council is that, if development does take place, there would be a lack of provision of secondary education facilities.

A number of Staining residents stressed that recent development in the settlement has put pressure on the roads, drainage system and school places. The residents stated that additional housing would mean increased use of the private car and increased carbon emissions. They consider that Lytham St Annes could support more housing as the relevant infrastructure and employment opportunities are already in place. Staining has issues of flooding with foul sewage and from dykes and ponds. They also state that additional development would result in the loss of trees, habitats and greenfield land and that an increase in impermeable surfaces such as paths and driveways would increase flooding issues. A number of residents from the other smaller rural settlements submitted similar comments to those submitted by Staining residents.

Six sites were submitted for consideration. These were submitted by Mactaggart and Mickel, Windmill Group of Properties, Carter Brothers, the Duchy of Lancaster, Kirkham Grammar School and a couple of residents of Poulton-le-Fylde.

6.3 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that the options which promote development in the local service centres of Kirkham, Wesham and Warton perform well against SA Objectives, in particular around Kirkham due to its good rail links and comparatively few environmental constraints. Development in Warton also has sustainability benefits, including its proximity to the Enterprise Zone, available brownfield land and the fact that it could benefit from physical investment.

Similarly, development at the edge of Blackpool has sustainability advantages, provided development is phased and serviced by adequate public transport and essential services.

Rural isolation is noted as a key issue in the borough and only Option 4 seeks to address this. The SA recommends that a degree of rural development occurs which is more than that proposed in Options 1, 2, 3 and 5 but not as much as Option 4, on a small scale and to a design that reflects the local character.

6.4 Council's Response

The Council welcomes the comments received and it is acknowledged that continuing cooperation with the neighbouring authorities of Blackpool, Wyre, Preston, West Lancashire, South Ribble, Lancashire County Council and other organisations is required under the Duty to Cooperate. Work is ongoing on the production of Memorandums of Understanding to address these strategic cross boundary issues.

The Council accepts the importance of the Enterprise Zone at Warton and Blackpool Airport as key drivers of economic growth and the need to plan sustainably for future development around Warton.

With regard to flooding and infrastructure issues, the consultation document refers to the preparation of a Community Infrastructure Levy for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. The Preferred Option will include phasing to allow for necessary infrastructure to be provided ahead of development.

The importance of the North West Ethylene Pipeline is acknowledged and the Council confirms that the line of the pipeline will be included in the Local Plan Proposals Map. The Council also acknowledges the need to seek to avoid adverse impacts upon the international wildlife designations in the Ribble Estuary and other natural habitats and seek to minimise the loss of best and most versatile agricultural land.

Parish Council's and local residents' concerns with regard to the smaller settlements are noted. The consultation document states that further development in these areas will only occur if the settlement is supported by the necessary local services.

Of the six sites submitted for consideration, the site submitted by Mactaggart and Mickel, along with the site submitted by Windmill Group of Properties, are each already included in the Strategic Housing Land Availability Assessment (SHLAA). The sites submitted by Carter Brothers, the Duchy of Lancaster, Kirkham Grammar School and a couple of residents of Poulton-le-Fylde will be added to the SHLAA when it is updated. The SHLAA is an evidence document that will be considered as the Preferred Options are progressed.

6.5 Preferred Option

The preferred spatial option is likely to be an amalgamation of some of the aspects of the five suggested alternative options and the suggested sixth options. When deciding on the preferred spatial option the Council will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

7.0 Chapter 7: Provision of Homes in Fylde

Q2: Gross Housing Figure
Do you agree with the Gross Housing Figure? If not, what do you think the figure should be?

7.1 Consultation Responses

There were 163 responses to this question. 144 responses were submitted using the questionnaire. Of these, 94 respondents did not support the Gross Housing Figure and 50 supported it.

19 responses were submitted by letter and email. Of these 11 did not support the Gross Housing Figure, 1 supported the figure and 7 provided other comments.

7.2 Summary of comments on the Gross Housing Figure

As support for the Gross Housing Figure was primarily by way of responses to the questionnaire, there were few comments stating why the figure was supported. By way of letter and email responses there was a mixture of support and objection to the figure. For those respondents that did not support the figure, many pointed out that there are a number of empty properties throughout the borough which they consider could be brought back into use before new homes are built. Other respondents questioned the validity of the methodology used to arrive at the gross housing figure and the fact that the population projections underpinning the methodology are now out of date.

The Officer employed by the three Fylde Coast authorities to consider Fylde Coast Housing Market issues and author of the Fylde Emerging Housing Requirement Paper 2011 which underpinned the Gross Housing Figure, responded to the consultation. He has looked at the new ONS 2010-based population projections for Fylde, which were released after the Emerging Housing Requirement Paper was produced, and notes that they are higher than the 2008-based projections used in that Paper. In order to update the evidence he has applied 2008-based household size projections to the 2010-based population projections over the Plan period of 2011 - 2030 to estimate what the 2010-based household projections will be. Using this methodology, the average additional number of households in Fylde each year is forecast to be 373, which is significantly higher than the previous 2008-based household projections of approximately 280 per annum.

The CPRE points out that the housing requirement figure of 278 per annum appears to derive directly from ONS data but that ONS states that their figures are not an assessment of housing need but are meant as an indication of the likely increase in households, given continuation of recent demographic trends. The CPRE considers that the 278 figure is too high compared to the RSS figure of 306, which was defined prior to the recession and based on over optimistic growth assumptions. They state that the Fylde figure should complement Blackpool's proposed requirement of 300, and that Blackpool is a larger borough than Fylde and Fylde's death rate is predicted to exceed birth rate, which is not the case for Blackpool. The CPRE state that it is essential that the 5 year supply is achievable, given the market downturn, and that the gross figure should be closer to the historic delivery rate prior to the downturn of

250 per annum. The CPRE also considers that the requirement should be profiled so that less is required in the early years of the Plan period.

St Annes on the Sea Town Council also considers that the figure should be lower at 150 / 175. They point out that there are already significant numbers of empty properties and that the housing market is depressed and could remain so for a significant period of time. They state that several housing projects are already at an advanced stage of planning, namely two at the Pontins site, St Davids Road North, Queensway and the Aegon site and that there is the danger of an over-supply leading to empty buildings. The Town Council considers that there are few employment opportunities and that a larger figure is likely to result in even more properties occupied by an older population, which places a strain on local services and health and social care facilities.

Medlar with Wesham Town Council considers that 250 houses per annum have proved to be an attainable average for the borough, but that if 278 houses per annum are taken forward, this figure should be a ceiling. They add that the figure should not be an annual target over the next 18 years, as requirements and market restrictions can change.

However, the Duchy of Lancaster raises concern that a reduction in housing numbers from that set out in the RSS could lead to an unmet need and under-supply. They state that, if the Council is proposing this, the evidence will need to be substantial to ensure the Plan has enough flexibility to meet needs and does not have to rely on too many windfalls to meet demand. The Duchy states that the proposed Plan figure needs to ensure that both market and affordable needs are met, and that an objective assessment of housing needs should be made based on a wide ranging evidence base, which includes providing for 20% increase in housing due to persistent under-delivery. They suggest that the evidence base should include travel to work patterns and economic scenarios, in addition to population and household projections.

Bloor Homes consider that, in line with the NPPF, the figure for Fylde should be a minimum of 550 dwellings per annum, just to meet the requirements of demographic change and employment growth. They point out that Fylde has a very low supply of housing land (approximately 2 years) and that this does not take account of accrued shortfall. For this reason Bloor Homes consider that the Council should apply a 20% buffer on their housing figure as a consequence of their under-delivery.

Gladman Developments Ltd considers that there is a need to review the gross housing figure to take account of the borough's economic growth aspirations and the implications of a significantly ageing population. They consider the proposed gross target figure of 5,164 over the Plan period is unsound and suggest ranges from 376 per annum (based on the latest 2010 Sub National Population Projections to a maximum of around 560 if jobs growth (as set out in the draft Fylde Economic Development Strategy and Action Plan)), plus housing to offset the projected loss of working age people in the forecasts used. They state that a requirement of 560 is likely to be unrealistic but that the 2010 Population Projections requirement of around 380 should be considered the minimum additional requirement the Council should plan for. They also state that there is no justification for reducing the annual requirement below the RSS figure. They also suggest that a Contingency Policy should be included within the Local Plan which would be relevant when the authority cannot demonstrate a five year supply of deliverable sites plus an additional 20% of the five year delivery (i.e. a six-year supply).

Taylor Wimpey points out that the NPPF makes it clear that local planning authorities should have a clear understanding of the housing needs in their area. They consider that some of the evidence used to formulate the housing figure is not strong. For example, they state that the Fylde Housing Needs and Demands Study Update 2007 is five years out of date. They consider that the Emerging Housing Requirement Paper is inadequate in meeting the requirements of the NPPF, as they state that both the SHMA and the SHLAA fail to meet the requirements for up to date and relevant evidence. They state that the RSS remains the most up to date assessment of the housing requirement for Fylde and that the Council has not undertaken an alternative assessment that could be weighed against the RSS, nor have they produced a robust assessment which demonstrates that the RSS housing figures are inappropriate. Taylor Wimpey considers that historically low delivery rates of housing cannot be used as justification for the 9.2% reduction in the RSS housing requirement, but should instead lead the Council to ensuring a 20% buffer.

Mactaggart and Mickel also question the methodology and consider that a higher figure of approximately 400 dwellings per annum would be more appropriate and would reflect the vision to improve access to housing, to meet housing needs and to support the delivery of new employment growth. They state that the higher figure has been calculated using the figures in the Emerging Housing Requirement Paper, and that this higher target would also result in more affordable units.

Metacre considers that Fylde has fallen short of delivering its housing needs over the past 10 years and that there is a latent demand for housing above demographic forecasts. They consider that there is a critical affordable housing shortage, partly due to historic undersupply of housing and, if significant housing is provided at junction 4 of the M55, it would address Blackpool's needs, rather than solely Fylde's.

BAE Systems also query how the Gross Housing Figure accounts for economic growth and how it reflects the Duty to Cooperate in terms of dealing with the lack of available land in Blackpool.

Commercial Estates Group (CEG) considers that, given the borough has a number of major international employers and strong links to the wider Local Enterprise Zone, it seems neither appropriate nor necessary that the Council is seeking to revise its housing target downwards. CEG state that regard should be had to the proposed level of planned housing within the adjoining authorities of Blackpool and Wyre and the impact that a reduced housing target in Fylde will have on the housing market as a whole. They point out that, overall, the reduced targets for Fylde and Blackpool will result in significantly lower targets than what was deemed appropriate in the RSS for the sub area. They consider that Fylde's housing requirement figure does not factor in the significant level of under-delivery of housing and only plans for future growth. CEG considers that the Council should be planning for at least 306 dwellings per annum, consistent with the RSS requirement.

The Save Wrea Green Action Group considers that the Council should await the release of 2011 Census data before finalising a figure, and they mention that there are inconsistencies between the dates of various reports and the fact that some are 4-10 years out of date. They consider that empty homes should be taken into account and that downsizing of market and social housing should be considered in order to make better use of housing stock.

7.3 Council's Response

With regard to the comments relating to empty properties in Fylde, the Emerging Housing Requirement Paper refers to the fact that the House Condition Survey in

Fylde at the end of 2007 found that around 1,690 dwellings, equivalent to 5.1% of the private housing stock, were vacant. This figure is not overly high compared with the North West average of 4.5% in 2007. It is generally expected that around 3-3.5% of the housing stock will be vacant at any time as a result of people dying and homes being bought and sold.

Another significant reason why homes are vacant in Fylde is because they are being used as second homes. The 2001 Census found that 299 vacant homes in Fylde (equivalent to 0.9% of the housing stock) were vacant second homes. Subsequent Council Tax records show much higher numbers of homes registered as being second homes – around 600 (or 1.8% of all homes).

If the rate of vacant properties in Fylde could be brought down from 5.1% to 3% over 25 years, this would bring around 30 more homes into use each year. However, given the numbers of second homes, this level of re-introduction of vacant homes to meet housing requirements would be very difficult to achieve.

With regard to the methodology used to determine the Gross Housing Figure, the Council accepts that since the Emerging Housing Requirement Paper was produced the new ONS 2010-based population projections for Fylde have been released. These revised population projections, along with the comments received in response to the Issues and Options document, will be used to update and refine the housing requirement figure that will be included in the Preferred Options document.

7.4 Preferred Option

The housing target figure that will be included in the Preferred Options document will take account of the latest population projections and, in line with the requirements of the NPPF, will provide an objective assessment of housing needs in Fylde.

Q3: Housing Mix	
To ensure a better mix of house types, which of the following options do you support?	
Option A	Leave it to the private sector, apart from affordable housing requirements, to determine the right mix of house types.
Option B	Develop policies to restrict the development of flats in certain parts of Lytham St Annes and promote family housing across all parts of Lytham St Annes.
Option C	Develop policies which set out the requirement for a broad mix of different types and sizes of housing on all large housing development sites. These policies will accommodate the different circumstances (demographics and balance of existing stock) in different parts of the borough. This option would be supported by the SHMA and the detailed implementation would be supported by the detailed evidence in the SHMA as it is updated.
Option D	Continue with existing policies to require a mix of housing in all but the smallest developments, without setting detailed requirements.
Option E	In rural areas there should be a mix of house sizes with sufficient emphasis on smaller homes.

Option F	Specialist housing should be provided for older people, to cater for their increasing numbers, especially in Lytham St Annes.

7.5 Consultation Responses

There were 154 responses to this question. 141 responses were submitted using the questionnaire. The question allowed the respondent to choose more than one option, and most respondents supported a combination of the options. Of those who responded using the questionnaire, 71 supported Option B, 66 supported Option E, 65 supported Option C, 55 supported Option F, 26 supported Option A and 17 supported Option D.

13 responses were submitted by letter and email. Of these, 1 respondent each supported Options A, C, E and F and 9 supported a combination of the options.

7.6 Summary of comments on Housing Mix

Blackpool Council supports a policy approach based on the evidence in the Fylde Coast Strategic Housing Market Assessment (SHMA). For housing near the Blackpool periphery, Blackpool Council would welcome the housing mix complementing the Blackpool Housing Strategy.

Mactaggart and Mickel consider that Options D and F would help to achieve a better mix of house types and would not restrict potential development coming forward, as would be the case if Options C or E were adopted.

Gladman Care Homes Ltd supports a combination of Options A and C, in order to ensure an appropriate mix is delivered during the plan period.

BAE Systems consider that policy should include broad requirements, acknowledging that this may change over the plan period. In terms of development proposals, they state that it should be up to the applicant to justify the mix in the context of available evidence, including market requirements.

The Duchy of Lancaster supports a mixture of Options C and D, as they state that it can be unviable to dictate mix on smaller sites. The Duchy states that larger developments should adhere to evidence provided by the SHMA, whilst allowing small sites to come forward independently with regard to house types.

7.7 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) concluded that Option C offers the greatest control over housing mix and therefore the greatest potential to meet the full range of housing needs. Option D could achieve many of the benefits of Option C but they would be less certain.

Option B focuses on restricting the development of flats in parts of Lytham St Annes. However by only focussing on family housing, it is unlikely to meet the housing needs of all sectors.

Option A leaves the mix of housing to market forces which may still bring some benefits, yet may also result in a more limited range of market housing. It may not address the issue of vulnerable groups living in often poor quality, private rented accommodation.

Options E and F encourage a rural housing mix and housing for older people. Providing housing for the large and increasing elderly population in Lytham St Annes would meet an important housing need.

7.8 Council's Response

The Council welcomes the comments received, which are noted and will be taken into account at the Preferred Options stage.

7.9 Preferred Option

It is likely that the Preferred Option will include a policy approach that sets out the required mix of housing on larger sites, in line with the SHMA (which is to be updated), whilst smaller sites will be assessed on a site by site basis.

Q4: Housing Density	
To ensure land is used efficiently, whilst at the same time preserving the appearance of the built environment, which one of the following options do you support?	
Option A	The private sector should be able to determine densities.
Option B	A range of densities should be developed and applied to best suit the character and requirements of different parts of the borough.
Option C	A minimum density should be applied throughout the borough.

7.10 Consultation Responses

There were 157 responses to this question. 145 responses were submitted using the questionnaire. Of these, 122 supported Option B, 14 supported Option C and 9 supported Option A.

12 responses were submitted by letter and email. Of these, 8 supported Option B, 2 supported Option A, 1 supported a combination of Options A and B and 1 suggested that density should be determined on a site by site basis.

7.11 Summary of comments on Housing Density

House builders including Bloor Homes, Mactaggart and Mickel and Gladman Care Homes Ltd generally support a combination of Options A and B. They consider that density should be determined in the context of the character of the settlement, SHMA and marketability advice provided by house builders. The Duchy of Lancaster considers that, as housing density is not set out in the NPPF, Option A is the most appropriate.

The National Trust, CPRE, BAE Systems, St Annes on the Sea Town Council, Medlar with Wesham Town Council, Treales, Roseacre and Wharles Parish Council and Blackpool Council all support Option B, as they consider it provides the most balanced approach to housing density.

Great Places Housing Group suggests that density should be determined on a site by site basis.

7.12 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) concluded that Option B provides the most balanced approach to housing density. Although this option does not represent the most sustainable use of land compared with Options A and C, which are both likely to be higher density, there are greater opportunities to incorporate areas of greenspace which would benefit biodiversity, landscape and heritage.

Option A represents a more sustainable use of land than Option B, as it relies on the private sector to determine housing densities. However, this option would not cater for the needs of all residents, in particular family housing.

As Option C seeks to ensure a minimum density is applied to all new homes, this option is likely to deliver the most sustainable use of land. However, providing for a minimum density is also likely to result in a greater proportion of flats (as Option A), which would not cater for all housing needs.

7.13 Council's Response

The Council accepts the comments received and the SA's conclusion that Option C is most likely to deliver the most sustainable use of land and has the potential to meet the full range of housing need but that Option B would provide a more balanced approach that reflects the distinctive character of parts of Fylde.

7.14 Preferred Option

It is likely that the Preferred Option will include a balanced policy approach that sets out a range of densities to suit the character and requirements of different parts of the borough.

Q5: Housing need in rural villages
Q5 (a): Should a policy similar to the saved rural exception policy be included in the Local Plan?
Q5 (b): If a need is identified in rural villages should some market housing be permitted in order to fund affordable housing?

7.15 Consultation Responses

Q5 (a): Consultation responses

There were 140 responses to this question. 133 responses were submitted using the questionnaire. Of these, 90 answered 'yes' and 43 answered 'no'. 7 responses were

submitted by letter and email. Of these 2 answered 'yes', 2 answered 'no' and 3 provided further comments.

Q5 (b): Consultation responses

There were 144 responses to this question. 137 responses were submitted using the questionnaire. Of these, 91 answered 'no' and 46 answered 'yes'. 7 responses were submitted by letter and email. Of these, 3 answered 'yes', 2 answered 'no' and 2 provided further comments.

7.16 Summary of comments on Housing Need in Rural Villages

The National Trust, CPRE, Treales, Roseacre and Wharles Parish Council and Mactaggart and Mickel all consider that there should be a policy similar to the saved rural exception policy included in the adopted Local Plan.

The Duchy of Lancaster considers that, if the Council is planning to include a rural exceptions policy, there should be flexibility for developers to include some element of market housing, otherwise there is no incentive for such sites to be brought forward.

Mactaggart and Mickel consider that permitting market housing to fund affordable housing in rural villages would assist the overall viability of schemes. Bloor Homes also consider that some market housing should be permitted to ensure that rural affordable housing is delivered, and that this market housing could help finance the required infrastructure.

However, Treales, Roseacre and Wharles Parish Council consider that market housing should not be permitted in order to fund affordable housing and a resident of Staining considers that this issue should be left to Neighbourhood Plans to decide.

7.17 Interim Sustainability Appraisal

As both (a) and (b) allow a limited degree of affordable housing in rural villages, the results of the Interim Sustainability Appraisal (SA) are similar for both.

The provision of some affordable housing in small sites adjacent to villages has the potential to provide for rural housing needs. This may encourage rural service viability by enabling a broader residential population. However, with (b) the provision of market housing may increase house prices in an area.

Under (a) affordable housing may be higher density than market housing, which would represent a more efficient use of land, but may be less in keeping with local character. The same is true for (b), although providing a mix of affordable and market houses would represent lower densities overall, more garden spaces and a more mixed character to the development.

7.18 Council's Response

The Council accepts the SA's conclusions and welcomes other comments received. It recognises that viability of development is an issue to consider when setting policy for rural exception sites. Paragraph 54 of the NPPF states that a small amount of market housing should be considered on small rural housing sites in order to address viability.

7.19 Preferred Option

It is likely that the Preferred Option will include a policy similar to the saved rural exception policy and it is likely that a small amount of market housing will be permitted on sites of five or more dwellings, as long as at least 50% of the total amount of dwellings are affordable.

The Council already carry out viability testing and will continue to take this approach as well as having regard to any emerging government policy.

Q6: Provision of affordable housing	
To ensure that opportunities for providing affordable housing are maximised, which one of the following options do you support?	
Option A	The current policy approach should continue, unless a viability study shows that policies need to change.
Option B	The current policies should change. If you support this option, do you think that the thresholds should change, or do you think the method of providing affordable housing should change?
Option C	There should be an aim to provide affordable rented housing on every new housing site.

7.20 Consultation Responses

There were 152 responses to this question. 141 responses were submitted using the questionnaire. Of these, 82 supported Option B, 44 supported Option A and 15 supported Option C. 75 of the respondents that supported Option B provided further comments on the methods of providing affordable housing. Some felt that the threshold for affordable housing should change to reflect national planning guidance and that insisting on a contribution for affordable housing for smaller developments could result in unviable forms of development. Others considered that Parish Councils and residents should decide on the methods for providing affordable housing and that priority for the affordable housing should be given to local people.

11 responses were submitted by letter and email. Of these, 4 supported Option B, 1 supported Option A and 6 provided other comments.

7.21 Summary of comments on Provision of Affordable Housing

Blackpool Council suggests that any future policy should be in line with the recommendations set out in the Fylde Coast Strategic Housing Market Assessment.

Bloor Homes support Option A, stating that it is the only option that refers to viability testing. The Duchy of Lancaster agrees and considers that affordable housing policy should be viable and realistic. The Duchy states that if too many planning obligations are placed on a scheme, it will not be brought forward. They add that policy should ensure a balance is achieved between economic viability and affordable housing provision and should allow viability assessments to be submitted when schemes are struggling to prove viable.

Medlar with Wesham Parish Council supports Option B and considers that policy should take into account the character and existing density within a rural setting. Treales, Roseacre and Wharles Parish Council support Options B and C and the provision of low cost market housing.

St Annes on the Sea Town Council supports Option B and considers that thresholds should change so that expensive / executive homes are not allowed in one part of the borough with the affordable housing located elsewhere. Mactaggart and Mickel disagree and consider that a greater opportunity to provide commuted sums that could assist in the delivery of affordable housing elsewhere in the borough should be included in the affordable housing policy. BAE Systems also considers that policy should consider commuted sums in lieu of provision on large sites, and state that this could be used for provision in areas of high need in the borough.

Gladman Developments Ltd support Option B and recommends that affordable housing provision within urban and rural areas is simplified by negotiating up to 30% affordable housing on all sites delivering 15 or more dwellings. They state that schemes that cannot deliver affordable housing in accordance with policy should only be permitted where robust evidence demonstrates that viability would be compromised.

Great Places Housing Group points out that consideration should be given to tenure, type and size of housing units proposed by developers through developer contributions to ensure HCA compliance. They state that as current Fylde stock is 60% flats, they would welcome the development of more affordable family houses. They also point out that policy needs to require the units to be tenure blind.

7.22 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) concluded that Options A – C all provide alternative approaches to delivering affordable housing and that all options would directly address the borough's current shortage of affordable housing provision.

Option A seeks to continue with the current policy approach which ensures a proportion of new homes are affordable on residential sites. Where provision is less than 15 units in urban areas and 3 units in rural areas, a 5% financial contribution is negotiated. However, the current approach may not improve issues with affordable housing delivery as evidence in the Issues and Options document identifies that, to meet identified need, 58% of all completions would have to be affordable.

Option B provides for a change in policy approach. The SA notes that it is important that a balance is achieved between the economic viability of a site and the need for affordable housing provision, as too many affordable houses may detract private developers and too few would exacerbate current shortages.

Option C requires all sites to provide affordable housing. However providing affordable homes on all sites may not be appropriate, as in some areas affordability is less of an issue. Therefore on small sites, contributions for other areas more at need may be more beneficial. In addition, a balance is required between affordable home provision and market value provision to ensure development is economically viable and attractive to private developers.

7.23 Council's Response

The Council accepts the SA's conclusions and welcomes other comments received. It accepts that policy for the provision of affordable housing needs to change from that currently in place. Too onerous affordable housing requirements, along with other developer obligations, can render some schemes unviable. However, evidence shows that there is a substantial unmet need for affordable housing in Fylde. The requirement to undertake a Viability Assessment of policies will ensure that the issue of viability is addressed.

7.24 Preferred Option

It is likely that the Preferred Option will be based on a balanced approach between seeking to meet the unmet need for affordable housing and seeking to ensure economic viability. The Council already carry out viability testing and will continue to take this approach as well as having regard to any emerging government policy.

Q7: Lifetime Homes	
Which of the following options do you support?	
Option A	All new market homes should be built to Lifetime Homes Standards.
Option B	Only a percentage of new market homes should be built to Lifetime Homes Standards. If you support this option, what percentage would you suggest and why?
Option C	All new affordable homes should be required to be built to Lifetime Homes Standards.
Option D	Only a percentage of new affordable homes should be built to Lifetime Homes Standards. If you support this option, what percentage would you suggest and why?

7.25 Consultation Responses

There were 135 responses to this question. 132 respondents replied using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 90 supported Option A, 62 supported Option C, 28 supported Option B and 24 supported Option D. 3 responses were submitted by letter and email. Of these, 1 provided comments on Option A, 1 on Option B and 1 on Option C.

7.26 Summary of comments on Lifetime Homes

Bloor Homes consider that none of the stated options are appropriate as, in line with the NPPF, all homes should be built to Building Regulations Standards and not Lifetime Homes Standards. Notwithstanding that locally derived standards are inappropriate, they should not be introduced without adequate, transparent viability testing in accordance with NPPF paragraphs 173 and 174.

The Duchy of Lancaster states that development schemes need to be viable and considers that, as there is national guidance with regard to new homes building standards (Code for Sustainable Homes), that these should not be set out within the Plan.

BAE Systems suggest that the provision of lifetime homes will need to be considered alongside other competing requirements and implications on viability.

Commercial Estates Group agrees and considers that requiring all market homes to be built to Lifetime Homes Standards is not an appropriate approach, as this requirement can significantly impact on the viability of a development.

Treales, Roseacre and Wharles Parish Council support Option B and suggest that homes principally sized for sole or couple occupancy should be built to Lifetime Homes Standard. They state that this could be a percentage of the total, suggested 25%, with an option to revise this subject to demand.

7.27 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that Options A and B provide alternative approaches to requiring new market homes to be built to Lifetime Homes Standards, whilst Options C and D provide similar alternative approaches for new affordable homes.

Option A would offer health benefits as residents' quality of life would be improved. However, requiring all new market homes to meet Lifetime Homes Standards could make schemes less viable, less able to fund required levels of affordable housing and less attractive to private developers. Option B therefore presents a more balanced approach to incorporating Lifetime Homes Standards, as it only requires a percentage of dwellings to meet the Standards.

Option C performs in a similar way as Option A, although it relates to affordable homes. However, requiring all affordable homes to meet Lifetime Homes Standards may make homes more expensive and therefore reduce the effect of homes being 'affordable'. As with Option B, Option D presents a more balanced approach to incorporating Lifetime Homes Standards, as it only requires a percentage of dwellings to meet Lifetime Homes Standards. It would also be more attractive to private developers.

7.28 Council's Response

The Council accepts the SA's conclusions and welcomes other comments received. It accepts that too onerous requirements on developers to meet standards over and above that required by Building Regulations can render some schemes unviable. The

new requirement to undertake a Viability Assessment of policies will ensure that the issue of viability is addressed.

7.29 Preferred Option

It is likely that the Preferred Option will seek a balanced approach between seeking to meet quality of life requirements whilst addressing economic viability.

Q8: Park Homes

If park homes are permitted should there be a requirement for contributions to affordable housing, in the same way as market housing is required to?
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7.30 Consultation Responses

There were 140 responses to this question. 133 respondents replied using the questionnaire. Of these, 84 respondents answered 'yes' and 49 respondents answered 'no'. 7 responses were submitted by letter and email. Of these, 4 answered 'yes', 2 answered 'no' and 1 provided other comments.

7.31 Summary of comments on Park Homes

The CPRE, St Annes on the Sea Town Council and Treales, Roseacre and Wharles Parish Council consider that, if park homes are permitted, they should contribute through a commuted sum to affordable housing in the same way as market housing. Mactaggart and Mickel agree and suggest it may be appropriate for a separate policy relating to park homes with appropriate threshold and contribution levels.

However, Medlar with Wesham Town Council disagrees and considers that this requirement could compound housing provision issues due to a reluctance to provide park home pitches within Fylde. They add that holiday lettings could also be affected by this requirement.

7.32 Council's Response

The Council welcomes comments received and will consider the requirement for contributions towards affordable housing as part of the Preferred Options document.

7.33 Preferred Option

It is likely that the Preferred Option will seek contributions towards affordable housing as part of proposals for park homes that are intended for use on a year round basis. It is unlikely that contributions will be sought for proposals intended for part year holiday letting use only.

The Council already carry out viability testing and will continue to take this approach as well as having regard to any emerging government policy.

Q9: Community Self Build

Should the Council reserve the right to refrain from requesting contributions for affordable housing with Community Self Build Schemes?

7.34 Consultation Responses

There were 145 responses to this question. 140 respondents replied using the questionnaire, with 92 respondents answering 'yes' and 48 respondents answering 'no'. 5 responses were submitted by letter and email. Of these, 3 answered 'yes', 1 answered 'no' and 1 provided other comments.

7.35 Summary of comments on Community Self Build

The CPRE and St Annes on the Sea Town Council consider that the Council should reserve the right to refrain from requesting contributions for affordable housing with Community Self Build schemes. Medlar with Wesham Town Council agrees, as it considers that imposing this requirement on schemes could hinder housing supply. However Treales, Roseacre and Wharles Parish Council disagree and consider that contributions should be sought.

7.36 Council's Response

The Council welcomes comments received and will consider whether the Council should refrain from requesting contributions for affordable housing with Community Self Build schemes as part of the Preferred Options document.

7.37 Preferred Option

It is likely that the Preferred Option will seek to reserve the right to refrain from requesting contributions for affordable housing with Community Self Build schemes in order to seek to increase the economic viability of these schemes and encourage more schemes to come forward to add to Fylde's housing supply. The Council already carries out viability testing and will continue to take this approach as well as having regard to any emerging government policy.

7.38 Summary of other comments on the Provision of Homes in Fylde

9 respondents provided other comments on the provision of homes by way of letter and email.

The HCA confirms that the vision and policies of the Local Plan provide an appropriate framework for locally agreed housing development in Fylde. They state that the Plan also helps inform HCA's programmes of investment and enabling support in the area and is well aligned with the priorities of the Fylde Coast Local Investment Plan.

The CPRE suggests that a local target for the use of brownfield land should be set to replace the RSS target for Fylde, which is at least 65% for the Fylde sub-region. They state that if the housing requirement over the Plan period is 5,124, then a 55% Fylde Brownfield Housing Target is proposed, and that this percentage should increase if the net housing requirement is less than 5,124. The CPRE also believes that long term empty properties are a wasted resource and that a Fylde Empty

Homes Strategy is required for reference by the Local Plan as a means of increasing housing supply.

The CPRE also mentions that the local requirement for gypsy / traveller sites / pitches needs to be established so that site allocations can be made, in order to avoid potential adverse impact on Fylde countryside areas from unauthorised use of land for such purposes.

Kirkham Town Council considers that there should be a strong commitment to seek, use and actively promote brownfield sites within existing settlement boundaries to ensure a steady supply of affordable and other housing for local people. The Town Council has identified 27 brownfield sites within existing settlement boundaries which it considers could yield 167 dwellings, including affordable housing.

Gladman Care Homes Ltd are keen to ensure that planning policy properly reflects the Fylde Coast SHMA and demographic evidence of the current and rising future need for specialist accommodation for older people in Fylde. They promote specialist housing with care for older people as a type of housing which enables adults with varying care needs to live as independently as possible in self contained homes.

McCarthy and Stone Developments are also concerned that the draft Local Plan does not adequately recognise the existing and growing elderly population and a need for specialist housing for the elderly. They urge that a specific policy for elderly housing be introduced within the LP which addresses the current and future housing needs of older people. They also urge that the Local Plan acknowledges the role that owner-occupied sheltered housing schemes play in meeting older person housing needs and in providing housing choice for the wider community by freeing up valuable under-occupied family homes in the local area.

Cassidy and Ashton consider that there is insufficient previously developed urban land within settlement boundaries and that there is a need for greenfield development in the form of a sustainable urban extension.

Commercial Estates Group considers that the Plan needs to make clear what is intended in terms of affordable housing delivery on sites, tied to evidence of need. They suggest it would be prudent to ensure that the need for affordable housing is met locally in Warton to provide housing close to places of employment.

A resident of Staining considers that brownfield land should be used first and apartment blocks should be built near to existing employment, and that either 'buy to rent' to residents at affordable prices or strict regulations for private rent properties should be imposed to fulfil this gap. The resident states that affordable housing for people to live and work in the area could help stop net out migration. Also retirement apartments, sheltered housing and family housing should be provided near to local facilities and there should be a focus on bringing park homes up to date.

7.39 Council's Response

The Council welcomes these comments relating to the provision of homes in Fylde and will consider them as part of the Preferred Options document.

8.0 Chapter 8: The Fylde Economy

Q10: Economy and Employment

Do you agree with the approach to dealing with economy and employment, as set out in paragraphs 8.21 - 8.23 of the Issues and Options document? If not, can you suggest alternative approaches?

8.1 Consultation Responses

There were 128 responses to this question. 115 responses were submitted using the questionnaire. Of these responses, 100 answered 'yes' and 15 answered 'no'. For those that answered 'no' there was a variety of suggestions for alternative approaches, including recognising the role non B use classes can play in contributing to job creation, ensuring that good employment land in the right locations is always available, irrespective of national supply figures and recognising the importance of employment to the rural area / economy.

13 responses were submitted by letter and email. Of these, 5 supported the approach set out in the document, 1 did not support the approach and 7 provided other comments.

8.2 Summary of comments on Economy and Employment

The CPRE, Bloor Homes, Mactaggart and Mickel, St Annes on the Sea Town Council and Treales, Roseacre and Wharles Parish Council all support the approach to dealing with economy and employment as set out in the document. Medlar with Wesham Town Council also supports the approach but considers that new commercial areas in or near rural areas should be strongly discouraged.

The National Trust does not support the proposed approach as it considers that it should follow the principles of sustainable development and, in particular, should prioritise the use of brownfield sites and ensure employment locations are accessible to public transport, cycling and pedestrian links.

Blackpool Council would welcome reference to the potential of land at Whyndyke Farm for employment use as part of a mixed use development. The Blackpool Local Plan Part 1: Core Strategy 'Revised Preferred Option' identifies an employment land requirement of 35 to 40 ha up to 2027. As only around 25 ha can be accommodated within Blackpool, the Council would welcome discussions with Fylde Council on how Whitehills / Junction 4 might address this shortfall. Blackpool Council also considers that more detail is required regarding the location of new business parks and that it is important to ensure that they are in sustainable locations, accessible by a variety of modes of transport.

BAE Systems consider that the approach should acknowledge that improving the quality of some of the borough's existing employment land may require a loss in employment land. Much of the employment stock requires significant levels of investment to help it meet the needs of existing and future businesses. Developing some land for other land uses may provide the funds to enable this.

The Duchy of Lancaster points out that Westinghouse (Springfields) is a main source of employment in the borough. They state that the Plan should make provision to expand at Westinghouse at Salwick and that this should be considered when

preparing the Preferred Options. They add that land to the north of Westinghouse could accommodate employment land and that the Duchy would like to work with Fylde Council to explore this possibility. The Duchy states that a large part of the borough is rural and that the Duchy has a significant landholding to the east, with strong links to Preston. They state that the rural economy is vital to keep the villages in employment and consideration should be given to a range of uses appropriate to the location.

A number of representations were made which promote specific sites for employment generating uses. West Register (Realisations) and AFC Fylde have both suggested sites and are keen to work with the Council in delivering appropriate economic development.

A resident of Staining considers that there should be no employment in Staining, other than small family businesses, as the village has a limited bus service and no train. The resident adds that the village also has poor internet speed and is thus unsuitable for home working.

8.3 Council's Response

The Council welcomes the comments received which support the approach to dealing with economy and employment.

In consideration of the comments from the National Trust, the employment land supply will meet the needs of all the established settlements of Fylde and the Council will work, as directed by the NPPF, to support sustainable economic growth.

It is acknowledged that continuing cooperation with the neighboring authority of Blackpool is required under the Duty to Cooperate and work is ongoing on the production of a Memorandum of Understanding which will address these strategic cross boundary issues.

In consideration of the comments from BAE Systems, the Council intends to protect existing employment sites that are not the subject of consents for alternative uses. However, as stated in the NPPF, the Council intends to avoid the long term retention of allocated sites where there is no reasonable prospect of the land being brought forward for B1, B2, B8 uses

If the borough is to strive towards delivering the vision of the Economic Development Strategy & Action Plan, then a balanced employment land portfolio needs to be created which provides for different types / sectors of employment development. The locations suggested will be considered in terms of their being potentially appropriate for new sustainable employment development.

The Council will continue to encourage rural diversification by allowing the conversion of agricultural space for employment uses.

8.4 Preferred Option

Subsequent to the Issues and Options consultation, the Fylde Employment Land and Premises Study (FELPS) July 2012, has been completed. It will assist in maintaining the economic health of the area and in supporting the supply of job opportunities for the borough's residents. It is considered to be a robust piece of work which will inform the economy and employment policies to be included in the Council's Local Plan.

The FELPS makes a number of recommendations, including the suggestion that the Council needs to find an additional 26.28 - 33.37 ha of employment land to the end of the Local Plan period, 2030.

When deciding on the Preferred Option the Council will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q11: Provision of new retail development	
Which of the following options do you support? You may choose more than one option.	
Option A	The market should decide where new retail development should be located.
Option B	The approach recommended in the Fylde Retail Study should be followed.
Option C	Increased convenience provision in the rural centres should be supported.

8.5 Consultation Responses

There were 127 responses to this question. 117 respondents replied using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 68 respondents supported Option B, 40 supported Option C and 30 supported Option A.

10 responses were submitted by letter and email. Of these, most respondents supported more than one option and one suggested an alternative option.

8.6 Summary of comments on Provision of new Retail Development

Blackpool Council support Option B as they consider this to be the most sustainable option, providing a structured approach to new retail development. They state that Option C will improve rural communities' access to convenience shops, therefore reducing the reliance on car travel. Blackpool Council suggest that Options B and C should be combined, provided that there would be local provision in the rural centres appropriate to their scale and function. They note that Squires Gate is defined as a retail centre but that there is no Squires Gate centre allocated in Fylde's current Local Plan nor suggested in the Fylde Coast Retail Study 2011.

The CPRE, St Annes on the Sea Town Council and Medlar with Wesham Town Council also support both Options B and C. Medlar with Wesham Town Council considers that Option B would allow a wider range of goods and services to be available in key service centres and that Option C would help to mitigate rural deprivation and would deter private vehicle use. The Town Council is disappointed that Wesham is omitted in this section as it considers growth in the retail sector should be encouraged in Wesham.

BAE Systems considers that future policy should acknowledge the need for a retail centre within Warton.

The Save Wrea Green Action Group considers that parking issues in Lytham and St Annes need to be resolved as they can result in shoppers avoiding both locations.

Treales Roseacre and Wharles Parish Council support Option C.

Sainsburys does not support any of the options and suggests an alternative option which reflects the NPPF and focuses development in existing centres. However, it points out that retail impacts and sequential testing should determine whether a proposal is acceptable, allowing each application to be determined on its own merits.

8.7 Interim Sustainability Appraisal

As Option A allows the market to decide where new retail development will be located, this would result in uncertainties. The most beneficial locations and retail types may not be delivered. Town centres could also become disjointed, with greater opportunities for crime and an over representation of charity and bargain shops. In addition, this option may not address the underrepresented comparison goods sector in Kirkham and St Annes, or small scale convenience provision in rural areas.

Option B provides a more structured and balanced approach to retail provision as it suggests following the Fylde Coast Retail Study. The Study sets out recommendations to address retail development across the Fylde Coast and recognises that appropriate small scale enhancements to convenience provision in rural areas can support communities and reduce private car use. The study also seeks to ensure Fylde's retail centres (Kirkham, Lytham and St Annes) are vibrant and viable places. This could reduce fear and opportunities for crime, along with enhancing community spirit and cohesion. This option performs better against the SA Objectives than Option A.

Option C specifically relates to convenience provision in rural areas (which is also included within Option B). This option would improve rural diversification and economic viability if combined with appropriate housing provision and would provide an increased job offer within rural centres. However Option C should be in addition to other policy options, rather than in isolation.

8.8 Council's Response

The Council welcomes the comments received which support the approach to dealing with the provision of new retail development as recommended in the Fylde Retail Study 2011.

The Fylde Coast Retail Study 2011 focused its assessment on existing town and district centres. The reference to Squires Gate is intended to recognise the existence of the out of centre retail development. It is, however, agreed that there is no Squires Gate centre.

In considering the status awarded to Wesham, the Council will apply a sequential test to proposals for main town centre uses.

In consideration of the comments from BAE Systems, the Council has suggested that Warton is defined as a local centre. Any possible change in that status will be considered in the context of planned growth in Warton.

Parking provision in Lytham and St Annes will be addressed in that part of the plan relating to transport and parking standards. Encouraging sustainable travel will be integral to making town centres accessible.

In consideration of the comments from Sainsburys, Option B is one which reflects the NPPF.

8.9 Preferred Option

The retail strategy in the Local Plan is likely to be based upon the findings of the Fylde Coast Retail Study 2011 and allow increased convenience provision in the rural centres appropriate to their scale and function. When deciding on the Preferred Option the Council will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal. It is suggested that Squires Gate is defined as out of centre rather than other centre. The status assigned to a particular centre within the hierarchy of retail centres will reflect the level of growth planned in that centre such that it does not impact upon town centre vitality and viability.

Q12: Provision of new tourist accommodation	
Which of the following options do you support? You may choose more than one option.	
Option A	The approach recommended in the Fylde Visitor Accommodation Study should be followed.
Option B	The market should decide where new tourist accommodation should be located, providing it follows the guidance set out in the NPPF.
Option C	An increase in holiday accommodation in rural areas should be supported. If you support this option, what type of accommodation, scale and location should be supported?
Option D	An alternative approach should be followed. If you support this option, what approach do you suggest? Do you have evidence to support the viability and deliverability of the approach?

8.10 Consultation Responses

There were 120 responses to this question. 113 responses were submitted using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 71 supported Option A, 37 supported Option B, 10 supported Option C and 10 supported Option D. Of these, 17 respondents provided other comments on Options C and D.

7 responses were submitted by letter and email. Of these, 3 supported Option A, 2 supported Option B, 2 supported Option C and 0 supported Option D. Of these, 5 respondents provided other comments on Options A, B and C.

Overall, the majority of support was for Option A, followed by Option B and the least support was for Options C and D.

8.11 Summary of comments on the Provision of new Tourist Accommodation

The CPRE and Blackpool Council support Option A. St Annes on the Sea Town Council support Options A and B. Medlar with Wesham Parish Council support Options B and C.

The majority of comments were provided by residents from Staining regarding Option C. Concerns were raised by residents about the impact that tourism accommodation within the rural area could have on existing infrastructure, and also how it could encroach onto greenfield sites. Concerns were also raised about disruption to the settlement centres and it was suggested that this form of development may be more appropriate at the outskirts of rural settlements.

It was stated that there is demand within rural areas for new and converted high quality self catering accommodation, and one respondent suggested that there was adequate caravan park provision in Staining. It was also stated that support for B&B accommodation should be provided.

Respondents suggested tourism should continue to be directed to Lytham St Annes, stating that there is existing infrastructure and potential to benefit the economy in this settlement, and that park homes could be located on the Lytham St Annes boundary. In contrast, a respondent said tourism should not be the priority as the economy must be diverse. Another respondent stated that existing visitor accommodation should be upgraded to current standards.

One respondent stated that the NPPF should be followed, whilst another stated that development should focus on brownfield sites.

8.12 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that Option A provides the most structured approach to tourist accommodation as it follows the approach recommended by the Fylde Visitor Accommodation Study. In addition, Option A would offer a small increase in the local job offer and would contribute to improving the vitality and vibrancy of town centres. However there is potential for any modest expansion of static caravan parks to lead to adverse effects on landscape character and potentially biodiversity.

The SA states that Option B, in allowing the market to decide where new tourist accommodation should be located, would lead to a greater job offer than Option A, as it may lead to a 'boom' in accommodation development. However, it may also lead to an oversupply and potentially to inappropriate development. Therefore Option A would provide more benefits to urban renaissance, as holiday accommodation would be concentrated within designated areas which would enhance the vitality and vibrancy of town centres and enhance urban areas as places to visit / stay.

Option C relates to increasing holiday accommodation in rural areas. There are many potential adverse effects associated with this option relating to impacts on biodiversity, historic assets, water resources, landscape character and land resources.

8.13 Council's Response

The Council welcomes the comments received, which are noted and will be taken into account at the Preferred Options stage.

With regard to infrastructure in rural areas, the consultation document states that the Council will be producing an Infrastructure Delivery Plan which will look at physical, social and green infrastructure. Also, the consultation document refers to the preparation of a Community Infrastructure Levy (CIL) for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. The Preferred Option will include phasing to allow for necessary infrastructure to be provided ahead of development. The Infrastructure Delivery Plan will be used to inform the CIL.

The Council agrees that development should normally be directed to brownfield sites before greenfield sites. However, brownfield sites can sometimes present greater biodiversity interest than greenfield sites. Furthermore, it may not always be possible to locate all development on brownfield sites.

The Council acknowledges comments made in relation to rural tourism and its impacts on the rural community. This will be further explored as the Preferred Options are progressed.

With regard to comments on accommodation, the Visitor Accommodation Study supports high quality self catering lodge accommodation and encourages tourism to continue to be directed to Lytham St Annes and the primary and secondary holiday area. Requirements for touring pitch and B&B accommodation are also referred to.

The Interim Sustainability Appraisal suggests that Option A, which recommends following the approach in the Visitor Accommodation Study, would provide greater support for existing accommodation areas. Also, it encourages urban renaissance and is more likely to encourage refurbishment of existing accommodation.

The Local Plan will need to follow the guidance within the NPPF to be found 'sound' at examination. There has been no other evidence provided which contradicts the findings of the Visitor Accommodation Study.

8.14 Preferred Option

The Preferred Option will follow the NPPF and is likely to be based on the recommendations provided in the Visitor Accommodation Study. The Preferred Option will have to explore provision of holiday accommodation. The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

<p>Q13: Tourism management</p> <p>To achieve the vision set out in chapter 3, including the development of the 'Classic Resort Concept' at St Annes and promotion of a high quality tourism offer which also serves the local community, which aspect of tourism management do you think should be prioritised? Reference to the Interim Sustainability Appraisal will assist your choice of option.</p> <p>Please rank from A to F, (with A being the option you would prioritise most and F being the one you would prioritise least). If you have any other suggestions please let us know.</p> <p>The approach will be in addition to the options for managing tourism accommodation set out in Q12.</p> <p>The Preferred Options may include a combination of all of the options.</p>	
Option A	<p>Protect existing and provide additional indoor facilities and attractions.</p> <p>What type(s) of facilities and attractions are required, at what scale and where should they be located?</p>
Option B	<p>Enhance the night time economy.</p> <p>What type(s) of facilities and attractions are required, at what scale and where should they be located?</p>
Option C	<p>Capitalise on existing tourism assets, such as sporting and cultural events and heritage assets.</p>
Option D	<p>Expand the business related trip market, such as conference facilities.</p>
Option E	<p>Develop the Ribble Coast and Wetlands Regional Park.</p>
Option F	<p>Enhance public realm and open space.</p>

8.15 Consultation Responses

There were 126 responses to this question. 106 responses were submitted using the questionnaire. Of these responses, the majority supported Options A and F, followed by C, E and D, and least priority was for Option B. 58 respondents provided other comments on Options A and B and 38 respondents provided other suggestions.

10 responses were submitted by letter and email. Of these, the majority of support was for Options A and F, followed by C, E and D. Least support was for Option B. 8 respondents provided other comments on the options.

1 respondent provided other comments in response to tourism.

Overall the majority of support was for Options A and F, with least support for Option B.

8.16 Summary of comments on Tourism Management

The Council's Director of Community Services requested that the "Tourism" section be renamed as "Leisure and Tourism". The director also provided updates in relation to the Fylde Open Space, Sport and Recreation Study – Strategy and Action Plan as follows: According to Sport England's Active Places power analysis of demand, there is generally good provision in terms of quantity of indoor facilities in Fylde; The analysis suggests an over supply of sports halls, although a review of access to schools is required; The analysis suggests an over supply of swimming pools in the borough as a whole, although a review of access to private provision is required; There are gaps in swimming pool provision at Lytham and Freckleton; and according to KKP's analysis of demand, Fylde is significantly under-provided in terms of fitness provision, both in terms of current and future demand. The director added that new development should therefore be required to provide contributions towards existing and new sports provision including facilities, programmes and events.

The Council's Director of Community Services stated that the service is producing a coastal masterplan to regenerate the coastal strip from Starr Gate to Freckleton Marshes which will compliment the Lytham St Annes 2020 Vision 2009, and that this needs adding to the 'Local Evidence' section on page 97.

The Council's Director of Community Services also stated that fishing should be recognised as a leisure time activity and that opportunities should be taken to develop the canal as a tourist asset. It was also requested that the potential redevelopment of the Pleasure Island site and public realm improvements on the back of a sea defence scheme at St Annes be considered.

The majority of respondents were in favour of protecting existing and providing additional facilities, as set out in Option A. Comments were made stating that new facilities should be low key, family friendly and match the "classic resort concept." Comments were also made stating that facilities should be focused in Lytham St Annes and in other sustainable locations. However, some respondents stated that rural areas also require additional facilities and AFC Fylde said further facilities are specifically required for Kirkham and Wesham. Further comments stated that existing facilities should be maintained and new facilities should be affordable, that there should be initiatives to promote health and wellbeing, and that community facilities should be a priority.

BAE Systems suggested that it is important to diversify the tourism sector which will have long term benefits for the economy.

One respondent stated that there should be a policy to protect and enhance existing facilities and that indoor facilities should be retained where viable in all 1-3 tier settlements. Another respondent stated that there should be a needs assessment of facilities and guidelines for the night time economy. Some respondents suggested new facilities including multi-purpose indoor, sports and recreation facilities; outdoor lido; wet weather attractions; more heritage orientated attractions; and youth clubs. St Annes on the Sea Town Council referred specifically for the need for a conference centre for public meetings and organisations.

In relation to Option B, the majority of respondents stated that the existing night time provision is sufficient and that the night time economy is market-led based on tourism initiatives. Further comments stated that if additional night time economy is provided,

this should be low key and located in centres rather than villages. Many respondents stated that night time provision is provided in Blackpool.

The questionnaire asked respondents to provide any additional suggestions. In response to this, the comments received focused on improvements to existing facilities: Investment in the pier; improved beach facilities; capitalising on existing assets through ecotourism; preserving and reusing historic buildings; widening Lytham promenade for a cycling and pedestrian route; and extending Lytham Green car park to allow for further pedestrianisation in Lytham centre.

Reference was also made in the comments to the impact of shale gas on the tourism market, improving public transport links to and from Staining and better tourism marketing in the press.

8.17 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that Options A – F are not directly comparable as they each provide for different tourist facilities within Fylde. In protecting existing indoor facilities and providing additional facilities, Option A would directly benefit Lytham and St Annes as there is currently a lack of indoor facilities in these settlements, and it would also provide a small number of employment opportunities and would offer indirect health benefits.

Option B, which relates to the enhancement of the night time economy, could have both positive and negative effects on crime, as it may increase opportunities for anti-social behaviour yet also help to create thriving towns during the evening. This option would also provide a small number of employment opportunities. Option C would provide opportunities to enhance community cohesion, spirit and healthy lifestyles by capitalising on existing assets, such as sporting, cultural and heritage activities.

In seeking to expand the business-related trip market, it is unlikely that Option D would lead to any significant effects on the SA Objectives. Options E and F relate to the enhancement of the Ribble Coast and Wetlands Regional Park and enhancement of public realm and open space. Together these options could have beneficial effects on biodiversity, and would also have indirect benefits on health, and would result in beneficial effects on landscape character.

8.18 Council's Response

The Council welcomes the comments received, which are noted and will be taken into account at the Preferred Options stage. Reference to leisure within the "Tourism" section will be provided and Sport England's Active Places power analysis of demand will be added to the evidence base. The Council will consider policy on the protection of community assets and S106 / CIL contributions for existing and new sport provision. Reference will be made to the Coastal Masterplan, which will be added to the Local evidence section.

8.19 Preferred Option

The preferred spatial option is likely to be an amalgamation of some of the aspects of the six suggested alternative options.

The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

9.0 Chapter 9: Climate Change, Renewable Energy and Flood Risk

<p>Q14: Managing climate change Our approach to managing climate change will be to require development and land use to mitigate and adapt to the effects of climate change. This could include a variety of measures, in addition to the generation of renewable and low carbon energy (<i>see renewable energy section</i>).</p> <p>Which of the following aspects do you think should be prioritised for mitigation and adaption in Fylde?</p> <p>Please rank A to E, (with A being the option you would prioritise most and E being the option you would prioritise least). If you have any other suggestions please let us know.</p> <p>The preferred options may include a combination of all the options.</p>	
Option A	Focus development in sustainable locations to minimise the need to use private cars, in order to reduce carbon emissions.
Option B	Encourage the reuse and conversion of existing buildings and structures.
Option C	Improve the energy and water efficiency of existing and new buildings.
Option D	Adapt the design and orientation of buildings in order to maximise solar gain and/or provide shelter from the elements; take advantage of natural light and ventilation; use grey water and rainwater; provide collection and storage for waste and recyclables.
Option E	Prioritise addressing the impacts on flora, fauna and sensitive habitats in the borough.

9.1 Consultation Responses

There were 129 responses to this question. 119 responses were submitted using the questionnaire. Of these responses, all options were supported as priorities for managing climate change, and 20 respondents provided further suggestions.

10 responses were submitted by letter and email. Of these, 4 respondents prioritised the options. Greatest priority was for Options A-C, with least priority for Options D-E.

9.2 Summary of comments on Managing Climate Change

The majority of respondents, including the CPRE and Blackpool Council, suggested that all options are equally important and should be taken forward collectively in one policy in the Local Plan. Respondents from Staining also commented on the benefits of protecting biodiversity in order to combat climate change and the need to protect flora and fauna. Multi-purpose green links for wildlife and cycle / pedestrian routes

was also discussed, as was the reuse of existing buildings and materials and retaining areas of character by the Duchy of Lancaster.

Respondents referred to the measures needing to be viable and cost effective, and that they may not all be suitable for pre 1914 properties. Reference was also made to the requirements already being included in the NPPF and building regulations. Hovercraft Services UK suggested allowing business development in sensitive areas could provide funding for these areas. Another respondent stated that car usage cannot be reduced and that there is a need to become more car friendly.

Blackpool Council suggested that a Climate Change policy could combine all the options, stating that this would represent a comprehensive strategy benefitting Fylde, the Fylde Coast and the wider environment. The Environment Agency could not rank the options, stating that they are not directly comparable. However, they suggest a relevant policy in the Local Plan could encourage new development to manage climate change through each of the options.

St Annes on the Sea Town Council suggested development should be concentrated on brownfield sites. The Duchy of Lancaster supports the re-use or adaptation of traditional agricultural buildings, stating that this could help reduce demands for new buildings in the countryside and encourage diversification of the rural economy. The Duchy adds that the NPPF should be taken into account and also the desirability of sustaining historic assets such as traditional agricultural buildings.

Mactaggart and Mickel suggest safeguarding the environment by allowing appropriate development in the right locations and developing policies which protect the most important environmental and ecological areas.

Other comments by Bloor Homes referred to encouraging energy efficiency over 'bolt on' renewable energy technology.

9.3 Interim Sustainability Appraisal

The Interim Sustainability Appraisal states that Options A – E are not directly comparable as they each provide for different ways to manage climate change. Option A seeks to focus new development within sustainable locations in order to reduce the dependence on the private car. This would also improve access for all and may offer health benefits if people are encouraged to walk / cycle rather than use their cars. Congestion may also be reduced under Option A, along with associated CO₂ emissions and air quality over the long term.

Option B encourages the reuse and conversion of existing buildings, which offers a sustainable use of land resources. It may also improve local townscapes, Conservation Areas and the historic settings of Listed Buildings. This option may therefore also benefit Lytham Hall.

Option C relates to improving water and energy efficiency of existing and new buildings. Therefore it would benefit SA Objectives 13 'Protect and enhance the quality of water features and resources, and reduce the risk of flooding' and 14 'Limit and adapt to the impacts of climate change'.

Option D also seeks to maximise water efficiency through incorporating grey water and rain water harvesting technology into new development. In addition all elements of Option D contribute to creating a more sustainable borough.

Option E seeks to prioritise addressing the impacts on flora, fauna and sensitive habitats in the borough, which would have major benefits on biodiversity resources. It would protect designated sites of nature conservation importance, wildlife habitats and wildlife corridors and provide opportunities for people to access wildlife and open green spaces. This would also offer health and landscape benefits.

9.4 Council's Response

The Council welcomes the comments received, which are noted and will be taken into account at the Preferred Options stage.

The Council agrees that energy efficiency of buildings should be the first priority before the generation of onsite renewable and low carbon energy.

9.5 Preferred Option

The Preferred Option is likely to be an amalgamation of some of the aspects of the five suggested options. The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q15: Development of renewable and low carbon energy sources	
Option A	The Local Planning Authority identifies suitable areas for renewable and low carbon energy sources and supporting infrastructure, in order to secure the development of these energy sources. If so, what type of renewable and low carbon energy sources should it consider and at what scale? What criteria should it use to determine their selection? Are there any particular areas of Fylde that should be identified for renewable and low carbon energy sources?
Option B	The Local Planning Authority does not identify areas and leaves it to the developer to make applications for their preferred areas.

9.6 Consultation Responses

There were 119 responses to this question. 111 responses were submitted using the questionnaire. Of these responses, 81 supported Option A and 30 supported Option B. 17 respondents provided further comments on Option A.

8 responses were submitted by letter and email. Of these, 4 supported Option A and 4 did not state a preference.

Overall the majority of support was for Option A.

9.7 Summary of comments on the Development of Renewable and Low Carbon Energy Sources

Blackpool Council prefers Option A and suggests that guidance on the suitable location of the various renewable and low carbon technologies would reduce the

number of applications for schemes that could have detrimental impacts on the surrounding area. They add that mapping could be provided by a Renewable Energy Map using the Lancashire Sustainable Energy Study.

The National Trust supports Option A, and they also support a criteria-led approach to micro-renewables, with suitable areas identified for commercial renewables. They state that this should cover the main technologies at a commercial scale: wind, solar, hydro and tidal. The CPRE support Option A but suggest this will not stop private initiatives coming forward.

St Annes on the Sea Town Council support Option A and suggest that solar collectors / panels, where appropriate, should be installed in every new development. They state that reference to ground source heat pumps should also be included. In contrast, Medlar with Wesham Town Council is reluctant to support Option A, and state that the criteria should include scale, and also impact on communities and on rural areas.

Natural England recognises that policies relating to the provision of renewable energy have the potential to impact on designated wildlife sites, landscape character and biodiversity. BAE Systems advise that any assessment of areas suitable for renewable and low carbon energy sources, particularly commercial scale onshore wind, should consider the Warton Aerodrome.

Many respondents were in favour and some were against wind turbines and there was a preference for offshore wind energy, although some respondents suggested onshore wind energy could take advantage of Fylde's topography. A respondent suggested using existing windmills for energy generation.

Many respondents were in favour of new build development providing a form of renewable and low carbon energy generation to meet the development's potential energy demand. Respondents were also in favour of new build providing water capture and storage for recyclables. One respondent suggested that solar and wind measures could also apply to business parks.

Some respondents suggested measures to reduce water use in existing properties, such as water meters, and there were comments that reducing flooding through the use of permeable surfaces in hard landscaping and separate surface and foul water sewer system should be deployed. It was suggested that public buildings should lead by example and we should look at what other countries do. A respondent suggested that there should be an expert to offer advice on schemes.

Other comments refer to introducing control over Anaerobic Digestion plants and shale gas, with location limited to existing industrial sites. Comments stated that industrial sites should not be allowed to spread to the countryside and commercial considerations should not be considered in identifying appropriate sites.

9.8 Interim Sustainability Appraisal

The Interim Sustainability Appraisal states that Option A provides greater opportunities to avoid adverse environmental effects by locating development away from sensitive habitats, populations, landscape, heritage, flood plain etc. This may also help avoid cumulative effects, which in turn may create greater certainty for developers and increase the likelihood of low carbon technologies coming forward. In contrast, it may have the potential to blight some areas if it is known that

development may come forward in those areas in the future. Option B provides less certainty with regard to the extent of impacts.

9.9 Council's Response

The Council welcomes the comments received, in particular the suggested renewable and low carbon energy sources and criteria. It is clear that respondents support an approach that identifies suitable areas for renewable and low carbon energy sources and supporting infrastructure, as this would provide some certainty for members of the public, interest groups and developers.

The Council agrees that if this approach is taken forward, the renewable energy maps produced as part of the Lancashire Sustainable Energy Study should be used. The Council agrees that an aerospace safety zone, designated wildlife areas, landscape character and biodiversity should be considered under this approach. These elements are provided within the Lancashire Sustainable Energy Study.

Planning controls over mining operations (shale gas) are administered by Lancashire County Council's Minerals and Waste Planning Department. In determining applications for mineral extraction, Lancashire County Council has to ensure that operators meet the requirements of planning legislation governing the appropriate use of land.

Comments relating to the provision of renewable and low carbon energy, storage of recyclables and water capture for new build business and residential is provided within the options for Q14.

9.10 Preferred Option

The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q16: Generation of renewable and low carbon energy in new development	
How supportive should planning policy be towards reducing the borough's carbon emissions through the generation of renewable and low carbon energy in new development? Please choose one option.	
Option A	Generally supportive and follow the regional target which means that, where it is feasible and viable, non residential development above 1,000m ² and residential development of 10 or more units should secure at least 10% of their predicted energy requirement from decentralised and renewable or low-carbon sources.
Option B	More aspirational local targets should be set which exceed the minimum regional targets, aimed at raising the profile of Fylde as a sustainable borough.

9.11 Consultation Responses

There were 113 responses to this question. 106 responses were submitted using the questionnaire. Of these responses, 69 supported Option B and 37 supported Option A.

7 responses were submitted by letter and email. Of these, 4 supported Option B and 1 supported Option A. 1 respondent did not support either option and 1 respondent provided additional comments.

Overall, the majority of support was for Option B.

9.12 Summary of comments on the Generation of Renewable and Low Carbon Energy in New Development

Blackpool Council supports Option B and suggests that provision of information to developers is integral to the success of such a policy. They add that more stringent requirements should be coupled with a high degree of clarity of what is required and where and how they can be achieved.

Medlar with Wesham Town Council supports Option A. They add that if regional targets can be exceeded, the policy should not hold back aspiration. In contrast, Bloor Homes disagree with both options and propose that the local authority allows ever more efficient homes through the nationally controlled incremental changes to Building Regulations. Other comments were received in relation to biodiversity and the impact global warming has on the environment and wildlife.

A Staining Resident referred to improving energy efficiency and performance of buildings, including renewable energy and heat generation. The respondent suggested considering building shape, orientation, window size and distribution and the need to build on brownfield sites in existing settlements in order to reduce carbon footprint.

9.13 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that Option A would help to reduce carbon emissions over time. This could encourage inward investment in the long-term by improving the borough's green credentials. This option may also contribute to sustainable farm diversification, i.e. through the installation of wind turbines. The SA has recorded uncertain effects on biodiversity, landscape and heritage, as renewable energy development has the potential to lead to significant adverse effects on these resources if not developed appropriately or if impacts are not mitigated.

The carbon reduction benefits would be greater under Option B than Option A, as it is assumed that more low-carbon technologies would be deployed. However, more onerous targets for renewable and low-carbon energy may be seen by some developers as costly and less appealing. The option could result in greater risk to the natural environment if not sensitively designed. However, suitable mitigation and an appropriate policy framework should be able to avoid such impacts.

Both Options A and B would need appropriate project specific environmental assessments to ensure no significant adverse environmental effects would arise as a result of renewable and low carbon energy development.

9.14 Council's Response

The Council welcomes the comments received. It is clear from the responses that respondents are in favour of more aspirational local targets which exceed targets set in the Regional Spatial Strategy. The Council agrees that, if this approach is taken forward, the local target should not be a ceiling to hold back aspiration. The Council agrees that information and guidance would need to be provided for the policy to succeed. The Council also agrees that the relationship between building regulation requirements and planning requirements should be further explored.

Comments relating to building shape, orientation, window size, energy efficiency and renewable and heat generation are provided within the options for Q14.

9.15 Preferred Option

The Preferred Option will need to consider a policy which sets aspirational targets above regional targets. The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

<p>Q17: Sustainable Building Standards Should development be required to comply with sustainable building standards and design guidance in order to improve the building's energy and resource efficiency and reduce carbon emissions? Please choose one option.</p>	
Option A	<p>Yes, new buildings should comply with sustainable building standards and design guidance, such as the Code for Sustainable Homes for new build residential and BREEAM for new build non residential.</p> <p>If you support this option, what standard(s) and level of compliance should be required and do you have evidence to support the viability and deliverability of the approach?</p>
Option B	<p>Yes, new buildings (Option 1) and converted or renovated buildings should comply with sustainable building standards and design guidance, such as Ecohomes for residential conversion or renovations and BREEAM for non-residential conversion or renovations. This is shortly to be replaced by BREEAM Refurbishment for domestic and non-domestic schemes to be launched in 2012.</p> <p>If you support this option, what standard(s) and level of compliance should be required? Do you have evidence to support the viability and deliverability of the approach?</p>

Option C	Development should only have to comply with current building regulation requirements, which are statutory, and should not have to comply with sustainable building standards and design guidance which consider wider sustainability issues.
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9.16 Consultation Responses

There were 122 responses to this question. 111 responses were submitted using the questionnaire. Of these responses, 58 supported Option B, 29 supported Option C and 24 supported Option A. Other comments were provided by 40 respondents.

11 responses were submitted by letter and email. Of these, 3 supported Options B and C, and 2 supported Option A. 3 respondents provided additional comments.

Overall the majority of support was for Option B.

9.17 Summary of comments on Sustainable Building Standards

Blackpool Council supports Option B, stating that it provides a greater and more meaningful impact on the efficiency of the building stock. They add that it is imperative that existing buildings are targeted for energy efficiency measures, and state that this is the most effective way of reducing CO2 emissions and fuel poverty. They make reference to the launch of the Green Deal in Autumn 2012.

The National Trust support Option B and refer to their experience of working with developers to build new houses to standards that exceed building regulations. St Annes on the Sea Town Council supports Option B and the highest possible standards. In contrast, Medlar with Wesham Town Council raises viability concerns with such standards and how this could hinder housing provision. They suggest that a planning application that takes the standards into account should perhaps be looked on more favourably than one which is not.

The Environment Agency supports adoption of sustainable building standards and recommends setting targets as high as practicable to promote sustainable development. Mactaggart and Mickel state that they are committed to the sustainable building standards set out in the Code for Sustainable Homes.

Sports England supports Option A. They state that they have a range of design guidance that has been prepared in accordance with British standards to ensure sports facilities, refurbishments and new build are fully compliant and sustainable.

Gladman Care Homes support Option C and suggest that detailed policy with prescriptive sustainable energy requirements and design targets should not be included within the Local Plan, as they state that it could deter development. They add that the Local Plan should adopt a generic approach, encouraging sustainable development where appropriate and viable.

Bloor Homes support Option C, stating that this reflects the requirement of paragraph 96 of the NPPF which states that any local building standards should 'adopt nationally described standards.'

The Duchy of Lancaster suggests that development should only comply with current national guidance and that a policy on building standards is not necessary. They

state that development should not become undeliverable due to onerous planning obligations. They also state that converted and renovated buildings have much higher costs associated with them compared to new build.

Improving the energy efficiency of new and existing buildings was seen as positive by many respondents. One respondent said this should be prioritised for pre 1940 properties, relating to energy efficiency for renovations and conversions.

Many respondents suggested that Code Level 3 would be an appropriate level for new residential development, unless it is not viable. Respondents suggested BREEAM for non residential. Some respondents suggested higher standards should be encouraged where technology permits but that we should look forward as future technology improvements could affect existing targets. A respondent suggested an increasing scale based upon the Local Plan timeframe.

Existing viability was mentioned and how such measures are not currently viable with lower house prices. A respondent disagreed with setting standards, suggesting that the government has already aimed for code level 6 'carbon neutral', which they are taking forward through staged higher building regulations levels. One respondent referred to the fact that SuDS (Sustainable Drainage Systems) are not always appropriate for all developments.

9.18 Interim Sustainability Appraisal

The Interim Sustainability Appraisal states that Option A, which would ensure that all new development in Fylde would be sustainable and built to high standards, may offer indirect health benefits as there is a link between good quality housing and health and wellbeing. In addition, this option may also raise the profile of Fylde as a more attractive place to live.

Option B performs in a similar way to Option A. However, it also extends to converted and renovated buildings which would maximise sustainable benefits. In addition, Option B could help historic structures and heritage at risk to be renovated to high standards.

Option C only ensures new development complies with statutory building regulations requirements which would not offer the same extent of environmental benefits or wider sustainability benefits as recorded for Options A and B.

9.19 Council's Response

The Council welcomes the comments received. It is clear that the majority of support is for Option B. However there is favourable support for Options A and C.

The Council agrees that the energy efficiency of new and existing buildings is an important element which should be taken into account at the Preferred Options Stage. Viability of such a policy for new and existing stock will require further investigation.

The Council accepts that a target within a policy may vary over time in order to retain high standards as technology and building requirements advance. This will need to be explored further as the Preferred Option is produced. The relationship between building regulations and planning requirements will also be further explored.

9.20 Preferred Option

The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q18 Reducing surface water to the sewer system	
In addition to new development incorporating Sustainable Drainage Systems (SuDS), how else can the amount of water which enters the sewer system be reduced? Please tick which one of the following options you support.	
Option A	New development should be designed so that internal water usage is reduced, for example through the use of water efficient fittings, appliances and water recycling systems and the incorporation of green roofs.
Option B	Option should only be implemented in those parts of the borough that are subject to flooding.
Option C	New development should only be required to incorporate SuDS.

9.21 Consultation Responses

There were 124 responses to this question. 114 responses were submitted using the questionnaire. Of these responses, 86 supported Option A, 14 supported Option B and 14 supported Option C.

10 responses were submitted by letter and email that included comments to this question, with 9 of these supporting one of the options. Of these, 6 supported Option A, 2 supported Option C and 1 supported Option B.

Overall, the majority of support was for Option A and the least support was for Options B and C.

9.22 Summary of comments on Flood Risk

The Environment Agency stated that the Local Plan should seek to remove water from the sewerage system where development would impact upon the environment and water quality. They also state that the Local Plan should include a policy that includes the measures identified in Options A and C of Q18. The National Trust showed support for Option A.

Bloor Homes support Option C, stating that attempts to restrict internal water usage in new build homes will have a negligible effect and is impossible to control in the long term. Save Wrea Green Action Group stated that United Utilities do not support SuDS, and that SuDS can stagnate and can increase midges and mosquitoes. They add that there are also complications with maintenance of SuDS. One respondent stated that SuDS are not always appropriate for some developments.

The CPRE stated that there are issues in relation to the flooding of agricultural land, and that this needs to be more explicitly stated in the document. Some respondents

from Staining highlighted surface water flooding issues in the village, and that more development will increase the risk of flooding.

A resident from Staining stated that the village does not have the population to justify investment in flood defences, and that development should be focused in areas where flood defence measures are planned or exist. The resident also stated that the best flood defence is semi-natural grasslands and trees.

Whilst Medlar-with-Wesham Town Council prefer Option B, they state that planning applications should be presented in the knowledge that this standard is preferred borough-wide.

Blackpool Council suggested that clarification should be provided regarding the definition of “new development” and whether this includes conversions and refurbishments.

9.23 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) highlights the benefits of SuDS in helping to reduce and slow down the amount of surface water entering the sewer network, and that this helps to reduce the risk of flooding and for spillage into the Ribble Estuary. It also states that it can help to filter pollutants before entering groundwater and surface water.

In terms of effects upon the economy, the SA states that the stringent requirements for developers identified in Option A have the potential to discourage inward investment to an area, if perceived to be excessive due to construction and maintenance costs.

9.24 Council’s Response

In terms of surface water flooding issues, Planning Officers have met with United Utilities and the Environment Agency to seek information to include in the Infrastructure Delivery Plan, which will inform the emerging Local Plan. This information has shown the impact that surface water entering the sewer network is having on bathing water quality. This means it is imperative that new development incorporates SuDS as a minimum requirement, and this is reflected in Q18. Which specific type of “new development” will require SuDS will be put forward at the Preferred Options stage.

The government intends to implement the SuDS provisions of the Flood and Water Management Act in April 2013. This will require development with drainage implications to incorporate SuDS. The Council acknowledge that there are implementation and maintenance issues associated with SuDS, and also with incorporating measures to reduce internal water usage. These issues will need to be resolved as the Local Plan will not be found ‘sound’ at examination if the Council cannot demonstrate that the Plan is deliverable. It is noted that, of the three options, the majority of respondents prefer Option A, which includes measures for reducing internal water usage to be incorporated into new development.

The Council agrees that issues in relation to the flooding of agricultural land need to be more explicitly stated in the document. The forthcoming East Lytham Strategy will provide important evidence in relation to the maintenance of Environment Agency assets and managing flood risk on agricultural land in the area.

The consultation document refers to the preparation of a Community Infrastructure Levy for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. Consideration will be given as to whether this could be a mechanism through which contributions for the repair and replacement of flood defences is sought. It is agreed that green infrastructure plays an important role in flood alleviation and management, and this is stated in the consultation document.

9.25 Preferred Option

The Preferred Option will require SuDS as part of new development. New development that has surface water implications will be required to incorporate SuDS from April 2013. Precisely what “new development” will require SuDS, and whether measures to reduce internal water usage will be taken forward will be considered as the Preferred Options are progressed.

10.0 Chapter 10: The Natural Environment and Heritage

Q19: Measures to preserve and enhance important wildlife habitats How can the Council ensure that the measures set out in paragraphs 10.18 – 10.21 are achieved? Please choose one option.	
Option A	New development adjacent to important wildlife habitats should be required to provide contributions towards these measures. (The contributions could be developer contributions or Community Infrastructure Levy).
Option B	All development should be required to contribute towards these measures.
Option C	Development should not be required to contribute towards these measures, meaning the Council will need to rely on grant aid becoming available.

10.1 Consultation Responses

There were 148 responses to this question. 115 responses were submitted using the questionnaire. Of these, 83 supported Option B, 38 supported Option A and 12 supported Option C.

15 responses were submitted by letter and email that included comments to this question. Of these, 9 showed support for one of the options, with 6 of these supporting Option B and 3 supporting Option A. There was no support for Option C.

10.2 Summary of comments on Landscape and Biodiversity

The Environment Agency support Option B, but state that a financial contribution will not compensate for the loss of important wildlife features as a result of development. They add that such features should be integrated into development schemes, and that where this is not achieved, development should not be permitted. Similarly, Medlar with Wesham Town Council, in supporting Option A, state that contributions should not be seen as full mitigation to allow development in these locations.

The Environment Agency also state that the SSSI at Starr Hills is in an unfavourable condition and also that some brownfield sites provide significant ecological value. They also refer to the presence of water voles and great crested newts in the borough, stating that these species and their habitats are protected.

Blackpool Council welcomes collaboration with Fylde Borough Council to ensure that development at the Blackpool boundary considers the landscape characteristics and wildlife habitats in this area.

Bloor Homes state that Option A should only be taken forward provided the tests in CIL Regulation 122 are passed. BAE Systems state that Option A should only be taken forward provided that there is a recognised impact on a wildlife habitat as a result of the development.

The National trust support Option A, whilst the CPRE and St Annes on the Sea Town Council both support Option B.

A couple of residents of Staining stated that development on previously developed land should be charged less, and one resident stated that a biodiversity baseline should be measured in order to assess whether development would have a positive or negative affect on biodiversity.

One resident of Staining stated that the village is surrounded by green belt, which is also a SSSI, and that there are large uncultivated grasslands that cannot be replaced. Another resident of Staining stated that biodiversity resources should be expanded and improved, rather than destroyed.

10.3 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) highlights that Option B, in requiring all development in the borough to contribute towards the management of important wildlife habitats, is likely to result in the greatest benefits compared with the other options, and that this option may also have some benefits to landscape quality in those areas.

However, the SA adds that Option B is an onerous requirement and may deter developers from wishing to invest in the borough. It adds that Option A could be deemed to be a more commonplace approach. In relation to Option C, the SA states that this option would not result in any certain benefits.

10.4 Council's Response

One of the policy considerations set out in the consultation document is that valuable wildlife habitats will be protected. This is in line with paragraph 117 of the NPPF, which states that “planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations.”

As stated in the consultation document, housing will be required in the countryside in order to meet the borough's housing requirement. In developing the Preferred Options, the Council will need to balance a wide range of issues, including biodiversity considerations, when proposing the location of future development. A Biodiversity Audit of the borough is being produced that will be an informative piece of evidence in deciding the location of future development in terms of impact upon wildlife habitats.

The condition of the SSSI at Starr Hills will need to be considered as the Preferred Options are developed. One of the policy considerations in the consultation document is that the Fylde sand dunes will be enhanced and protected.

The consultation document refers to the preparation of a Community Infrastructure Levy (CIL) for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. Consideration will be given as to whether this could be a mechanism through which contributions for the preservation and enhancement of important wildlife habitats are sought.

It is noted that of the three options set out in Q19 of the questionnaire, the majority of respondents preferred Option B, which requires all development to contribute towards measures to preserve and enhance important wildlife habitats. The Council will consider what contributions will be required as the Preferred Options are progressed, taking account of comments received, along with the SA and other considerations. Where Plan policies require contributions as part of a planning

obligation, the Council will ensure that the requirements of CIL Regulation 122 are complied with. The specific measures to be proposed in the Plan will be considered as the Preferred Options are progressed.

The Council will endeavour to work with Blackpool Council to ensure that development at the Blackpool boundary considers the landscape characteristics and wildlife habitats in this area.

It should be noted that Staining is not surrounded by green belt. Rather, there is only greenbelt north of the village. Also, the nearest SSSI to the village is Marton Mere, which is adjacent to the Fylde borough boundary within Blackpool.

10.5 Preferred Option

In light of the comments received, it is anticipated that new development will be required to provide contributions towards the preservation and enhancement of biodiversity resources. Evidence set out in the Biodiversity Audit will provide further information as to what development will be required to provide contributions.

No comments were made in relation to landscape. It is anticipated that the policy considerations in relation to landscape, as set out in the consultation document, will be put forward in the Preferred Options.

Q20 Measures to enhance important areas for green infrastructure How can the Council ensure that the measures set out in paragraphs 10.41–10.44 are achieved? You may support more than one option. Reference to the Interim Sustainability Appraisal will assist your choice of option(s).	
Option A	New development adjacent to important areas for green infrastructure should be required to provide contributions towards these measures. (The contributions could be developer contributions or Community Infrastructure Levy).
Option B	All development should be required to contribute towards these measures.
Option C	Development should not be required to contribute towards these measures, meaning the Council will need to rely on grant aid becoming available.
Option D	The Council should be actively engaged in the promotion and improvement of green infrastructure.
Option E	The Council should just protect existing green infrastructure.

10.6 Consultation Responses

There were 142 respondents to this question. 128 responses were submitted using the questionnaire. The question allowed the respondent to choose more than one option. 80 respondents supported Option D, 62 supported Option B 48 supported Option A, 14 supported Option E and 6 supported Option C.

14 responses were submitted by letter and email that included comments to this question. Of these, 9 showed support for one or more of the options, with 6 supporting Option D, 5 supporting Option B and 4 supporting Option A. There was no support for Options C and E.

10.7 Summary of comments on Open Space and Green Infrastructure

For new development, the Environment Agency suggested that there should be a default requirement for on site provision of green infrastructure (GI) unless the developer can demonstrate why this is not possible. They also state that the Council should be actively engaged in the promotion of green infrastructure, as proposed in Option D. In relation to paragraph 10.23, they state that the Plan should identify that GI can play a positive role in managing surface water.

Bloor Homes stated that none of the options are appropriate and that enhancements to GI should be financed by adjacent developments, provided that tests in CIL Regulation 122 are passed.

Sport England suggest that a Playing Pitch Strategy is required that assesses the current and future demand and supply of pitches. They state that without this evidence it is impossible to assess the strategic need for sport and recreation over the Plan period. They add that a needs assessment for built sports facilities is a requirement of the NPPF. Sport England support Options A, B and D. AFC Fylde support Option D, and state that policies and allocations should allow the growth of sporting and recreational facilities.

In terms of GI linkages, the Council's Director of Community Services highlighted the importance of highway corridors for tree planting and wildlife. The director also highlighted the creation of a footpath and cycle path from Lytham Green along the estuary to link with Savick Brook in Preston and the Guild Wheel cycleway. Reference was made to the importance of the 7.5km stretch of coastline from Freckleton Marsh to Starr Gate, and also that the historic infrastructure of the coastal parkway is in need of restoration. The opportunity to develop the canal as a tourism asset was also stated.

In addition, the Council's Director of Community Services referred to the possibility of identifying new sites for tree planting such as Lytham Hall, Singleton Hall and the closed landfill site at the Belfry, Lytham. It was also stated that burial land is at a premium, and that provision needs to be made to allocate land for a cemetery extension on adjacent agricultural land at Lytham Park cemetery.

Blackpool Council highlighted the importance of cross boundary linking of GI in respect of any future development at the Blackpool boundary.

A resident of Staining stated that new provision of GI does not compensate for the loss of habitat when development occurs. Another Staining resident, in supporting Option A, stated that contributions should be higher for development that takes place on greenfield sites. One Staining resident stated that the loss of trees can increase flood risk.

10.8 Interim Sustainability Appraisal

The Interim Sustainability appraisal (SA) brings out that Option B is likely to give the greatest social benefits compared with the other options, and that this option would go the furthest towards improving biodiversity connectivity, landscape integration and

reducing flood risk. It adds that Option A would also provide these benefits, but to a lesser degree. Option B may be deemed to be an onerous requirement and may deter developers from wishing to invest in the borough, and that Option A could therefore be deemed to be a more commonplace approach.

The SA states that few direct benefits would be provided by Option C, and that this option would not result in any certain benefits. Option D would provide a number of social and environmental benefits and could also encourage people to live, work and invest in the borough.

Option E is effectively a 'business as usual' scenario, meaning that the benefits of Options A, B, C and D would not be realised. In addition, there is the potential for adverse effects on biodiversity resources as pressure in the existing green infrastructure network would increase as the population of Fylde increases.

10.9 Council's Response

The questionnaire responses show that there was strong support for green infrastructure enhancement, with strong support for Options B and D. In relation to developer contributions, which would be required if Option B was implemented, the consultation document refers to the preparation of a Community Infrastructure Levy (CIL) for the borough. The CIL will require contributions towards infrastructure maintenance and provision in the borough. Consideration will be given as to whether this could be a mechanism in which contributions for the enhancement of green infrastructure are sought.

Where Plan policies require contributions as part of a planning obligation, the Council will ensure that the requirements of CIL Regulation 122 are complied with. The specific measures to be proposed in the Plan will be considered as a Preferred Option is developed. The Council acknowledge there was little support for the Council not requiring contributions toward the enhancement of green infrastructure, as set out in Option C of the questionnaire.

The Council will consider whether to undertake a Playing Pitch Strategy, and also a needs assessment for built sports facilities, as part of the evidence base for the Local Plan.

As stated in the consultation document, housing will be required in the countryside in order to meet the borough's housing requirement. In developing the Preferred Options, the Council will need to balance a wide range of considerations, including green infrastructure considerations, when proposing the location of future development. A Biodiversity Audit of the borough is being produced that will be an informative piece of evidence in deciding the location of future development in terms of impact upon wildlife habitats.

The Council agrees that GI linkages, including tree planting, have multiple benefits. The Council will seek to support such GI linkages in the Local Plan. The Plan will also seek to support the enhancement of the 7.5km stretch of coastline from Freckleton Marsh to Starr Gate, as part of the Regional Park Plan for the Ribble Coast and Wetlands.

The Council will endeavour to work with Blackpool Council when negotiating green infrastructure requirements for future development that takes place at the Blackpool boundary.

The Council agrees that the loss of trees can increase the risk of flooding. The consultation document states that tree planting and woodland creation will be facilitated and that high quality green space, including woodlands, will be safeguarded.

The Council will also consider the identification of land adjacent to Lytham Park cemetery as a site for an extension to the cemetery.

10.10 Preferred Option

The Preferred Options will include measures to enhance green infrastructure provision, taking account of responses to the Issues and Options consultation, along emerging national policy, the findings of the Sustainability Appraisal, and also emerging evidence such as the forthcoming Biodiversity Audit. The measures through which the Plan will achieve this will be considered as the Preferred Options are progressed.

Q21: Rural diversification	
Which one of the following options do you support?	
Option A	<p>The Local Plan should set out what we consider to be an appropriate form of rural diversification and business and industry in the rural economy.</p> <p>If you support this option, what types of development and rural diversification do you consider to be appropriate, and at what scale?</p>
Option B	The market should decide appropriate rural diversification and business and industry in the rural economy.

10.11 Consultation Responses

There were 130 responses to this question. 123 responses were submitted using the questionnaire. Of these responses, 80 supported Option A and 43 supported Option B. Of these, 32 respondents provided other comments on Option A.

7 responses were submitted by letter and email. Of these, 4 supported Option A, 2 supported Option B and 1 supported both options A and B. 2 respondents provided other comments in response to this question.

Overall the majority of support was for Option A and the least support was for Option B.

10.12 Summary of comments on Rural Diversification

The CPRE and Treales, Roseacre & Wharles Parish Council support Option A.

Sport England support Option A and also set out two of its objectives which help frame its approach to rural diversification. The first objective promotes the urban fringe as an important resource in providing opportunities for sport. This objective also supports proposals for improved access for sport, for the development of

facilities such as golf courses and for built facilities, which it states can be developed in a way which meets sustainable development objectives. The second objective supports and promotes the use of natural resources for sport in a way which meets sustainable development objectives.

The National Trust support Option A, and state that the Plan should support common pressures, such as provision related to tourist facilities and uses requiring a rural location.

In support of Option A, some respondents stated that any development should not impact on existing businesses and that there should be more retail and service orientated development to make villages more economically and socially sustainable. A common view was that small businesses or industry in villages should support the local economy, and that the use of local workforce would be beneficial as it would retain skills in the community. Other comments stated that new development should take place on brownfield sites and be of an appropriate scale, range and diversity.

Respondents felt that the local community, Parish Council and Councillors could assist in determining appropriate forms of diversification. One respondent stated that a craft centre would be appropriate, but that large scale farm shops and office space would be inappropriate. A comment was made stating that the promotion of home working and non-intensive tourism would be appropriate forms of diversification.

One respondent stated that whilst agriculture may be in decline, agricultural land should be safeguarded for future use, such as for reducing the carbon footprint. Another comment stated that there should be greater protection and understanding of biodiversity and fauna and flora.

In relation to Option B, Medlar with Wesham Town Council stated that a policy on acceptable diversification could become out of date and would restrict the rural economy. However, they add that the Council should control the scale and nature of the diversification.

The Duchy of Lancaster, in support of Option B suggest that they should have flexibility to diversify their enterprise and diversification should be assessed on a site by site basis.

Land owner Mactaggart and Mickel support either Options A and B and stated that providing family housing would help to strengthen the rural economy.

Other comments on rural diversification were received. The CPRE disagree with paragraph 10.58 that anaerobic digestion is a form of diversification. They instead support increased arable farming. The CPRE further disagree with the use of 'Open Countryside,' as defined in glossary of the document, and propose this is replaced by 'Countryside Area,' as used in the current Fylde Borough Local Plan.

A Staining resident suggested that Fylde has less Green Belt on average compared to Lancashire and that the Green Belt should be increased for Staining to protect natural heritage, biodiversity and countryside.

10.13 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states that rural diversification has the potential to deliver a range of benefits to the community. In relation to Option A, the SA states that this has a greater potential to deliver development that would meet

rural needs, although there is no certainty that it would occur. By the council giving direction to the form of rural diversification it has the ability to tailor it to the needs of the rural economy and its residents' employment needs. However, this approach is less flexible and adaptive to change and market conditions. However, a more council-led approach would provide greater certainty that development would be appropriate and would both protect the environment and enhance it.

Option B could also deliver all the benefits of Option A. However, there is much greater uncertainty surrounding this as the type and form of development would be market-led and there would be less central direction to meet local social needs. Whilst there is a risk that development may not come forward under this option and not necessarily of the type that is needed to support local employment, a market driven approach is more flexible and may be more innovative, and thereby more successful. It brings more uncertainty than Option A. Similarly, there is less certainty over whether environmental protection and benefits would be delivered under Option B compared with Option A. However, this should be mitigated by adherence to the range of other environmental protection policies in the plan.

10.14 Council's Response

The Council welcomes the comments received, particularly the suggestions relating to appropriate forms of rural diversification and the ability to have flexibility to avoid restricting the rural economy and landowners.

The Council notes comments related to protecting agricultural land. The consultation document states that the Council cannot meet its housing requirements without substantial allocations on greenfield land, including agricultural land. The Preferred Options document will set out to protect the best and most versatile agricultural land from development. The definition of "open countryside" will be clarified in the Preferred Options document.

With regard to the Green Belt, the consultation document states that Fylde has four areas designated as Green Belt. Green Belt in Fylde is designated to check the unrestricted sprawl of built up areas, prevent neighbouring towns merging into one another and to assist in safeguarding the countryside from encroachment. The government guidance in the NPPF is clear that the general extent of the existing Green Belt is already established, and that new Green Belt should only be established in exceptional circumstances. The Council acknowledges that Fylde has less Green Belt on average than other Lancashire authorities. However, this is connected to the geographical location of settlements within the borough.

Reference to protection of biodiversity and flora and fauna is provided within the "Landscape and Biodiversity" section of the consultation document. The Preferred Options document will provide links between "Rural Economy and Green Belt" section and the "Landscape and Biodiversity" section.

10.15 Preferred Option

It is likely that the Preferred Option will include a policy approach that sets out appropriate forms of rural diversification and business and industry in the rural economy. The Preferred Options will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q22: Protection of heritage assets	
Which one of the following options do you support?	
Option A	Statutory heritage assets such as Listed Buildings and Conservation Areas should continue to be protected.
Option B	In addition to Option A, a local list of important buildings should be developed.

10.16 Consultation Responses

There were 126 responses to this question. 117 responses were submitted using the questionnaire. Of these responses, 83 supported Option B and 34 supported Option A.

9 responses were submitted by letter and email. Of these, 7 supported Option B and 2 supported Option A. Of these, 4 respondents provided further comments on Option B.

An additional respondent only provided other comments in response to this question.

Overall the majority of support was for Options B and the least support was for Option A.

10.17 Summary of comments on the Protection of Heritage Assets

No comments were made in relation to Option A.

English Heritage support Option B, but state that the NPPF requirement to set out a “positive strategy for the conservation and enjoyment of the historic environment” will involve more than what is proposed in Option B.

The Council’s Regeneration and Urban Design Manager supports Option B, adding that the Regeneration section intends to commence work on a Heritage Strategy followed by the preparation of conservation area appraisals, management plans, the publication of a ‘local list’ and policies in respect of other heritage assets.

Two further respondents stated heritage should also include biodiversity. There was also support for a local list of heritage assets if the local list is given protection.

The Council’s Director of Community Services stated that cultural assets should be recognised i.e. Lowther Pavillion, Pleasure Island and St Annes Pier, and that benefits of cultural provision in the rural area should be recognised. It was further stated that the contribution that Fairhaven Lake and Gardens and Lowther Gardens make to the heritage value of the area should also be recognised. Reference was made to the Department for Culture, Media and Sport’s definition of culture. It was further stated that recognition should be given to the role that vibrant cultural and creative communities can play in creating and supporting jobs and in supporting the regeneration of town centres. Comments were also provided that all new development should be required to contribute towards cultural provision, and that developer contributions could be used to improve / create new and existing facilities or the development of specific cultural programmes or events.

10.18 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) states the current policy of protecting statutory assets (as promoted in Option A) is beneficial to those assets and may also benefit the wider townscape and landscape of the borough. However, by also developing a list of locally important buildings, Option B also provides greater opportunities for retaining local character and architecture.

Indirectly, the preservation of heritage assets and historic character has potential to attract inward investment to the borough. Option B may contribute slightly more to this goal than Option A by also including locally important buildings. Protecting heritage assets can also preserve and present opportunities for education.

10.19 Council's Response

The Council accepts the importance of cultural assets and their contribution to heritage value and how this creates and supports jobs and town centre regeneration. The Council will be producing an Infrastructure Delivery Plan which will look at social infrastructure including education, health, telecommunication, community facilities and assets. The Community Infrastructure Levy (CIL) will help fund new infrastructure. The Preferred Option will include phasing to allow for necessary infrastructure to be provided ahead of development. The Infrastructure Delivery Plan will form the foundations of the CIL.

The Council accepts the protection of natural assets is of equal importance as built heritage. Protection of biodiversity is provided within the "Landscape and Biodiversity" section of the consultation document. The Preferred Options document will provide links between built and natural heritage (biodiversity).

We welcome input from the Council's Regeneration section and their short term work streams on a heritage strategy, conservation area appraisals and management plans, development of a local list and policies on other heritage assets. This will assist in meeting the NPPF requirements to produce a positive strategy for conservation and enjoyment of the historic environment.

10.20 Preferred Option

The Preferred Option is likely to be Option B, as this would take account of the recommendations in the Interim Sustainability Appraisal and preference put forward in the consultation responses and other comments received. Greater reference to the benefits of cultural assets and the wider role they play will also be provided. Developer contributions towards cultural provision will be further explored and greater links to the protection of natural heritage will be provided. The Preferred Options will also have to take account of emerging national policy and evidence provided by the Council's Regeneration section, along with other evidence that might come forward.

11.0 Chapter 11: Infrastructure and Transport

Q23: Approach to infrastructure

Do you agree with the approach to dealing with infrastructure as set out in paragraphs 11.22 and 11.23? If not, do you have any other suggestions?

11.1 Consultation Responses

There were 128 responses to this question. 104 responses were submitted using the questionnaire. Of these, 93 agreed with the approach to infrastructure, whilst 11 disagreed.

24 responses were submitted by letters and email. Of these, 7 stated whether they agreed with the approach to infrastructure, with all seven agreeing with the approach. The other 17 responses provided comments only.

11.2 Summary of comments on Infrastructure

Natural England stated their concern about bathing water quality at the Ribble Estuary and the impact on designated sites. The Environment Agency state that the issue of bathing water quality will require a cross boundary partnership approach to managing / resolving this problem. In relation to any development at the Blackpool boundary, Blackpool Council welcomes dialogue with Fylde Borough Council as part of the Duty to Cooperate in respect of infrastructure constraints.

The Environment Agency add that the Council will need to demonstrate that growth proposed in areas where there are sewer capacity issues can be delivered, and that new development in such areas should include the requirement to remove surface water from the sewer network, in addition to necessary infrastructure improvements. They also state that development must be phased to coincide with required infrastructure improvements. Another respondent also raised this point. The issue of bathing water quality and the impact on tourism was also highlighted. One resident referred to the surface water issues caused by poor drainage.

The Environment Agency highlight the need to consider the Water Cycle Strategy for Blackpool & Central Lancashire, and also the need to consider groundwater. They recommend linking in to the Fylde Peninsula Water Management Group, and state that consultation with United Utilities must take place in advance of the Preferred Options.

Lancashire County Council (LCC) stated that the library service could accommodate and cope with growth from all five spatial options. They also state that there is a shortfall in primary and secondary school places in Lytham, and the Fylde LSP Manager also raised this issue. LCC state that the main priority is primary places, but that there will be demand for an additional secondary school in Fylde, for which a site should be identified in the Local Plan. They state that the provision of school places for the planned growth set out in the consultation document should also be taken into account.

LCC would like primary and secondary education provision, highway access and safety and access to sustainable transport to be included in the list which may be covered by planning obligations.

National Grid highlighted the location of their gas and electricity transmission assets in Fylde. Wyre Borough Council point out that the proposed Singleton Wastewater Treatment Works is no longer their preferred option for addressing wastewater capacity issues in that area.

The Council's Director of Community Services highlighted Sport England's Active Places Power – Analysis of Demand, which shows that there is generally good provision in terms of quantity of indoor facilities in Fylde. However, it also shows that there are gaps in swimming pool provision at Lytham and Freckleton and that the borough is significantly under provided in terms of fitness provision.

Taylor Wimpey state that there is no clear evidence of a viability assessment in relation to infrastructure developments, and that the Council needs to conform with paragraph 173 of the NPPF. BAE Systems state that a summary of the Infrastructure Delivery Plan and Infrastructure Schedule should have been produced alongside the five spatial options to ascertain the infrastructure needs and constraints. Bloor Homes state that when determining the level of developer contributions, the tests set out in CIL regulation 122 must be met.

Lancashire Constabulary state that based on the level of proposed growth, their infrastructure will require investment. The Campaign for Real Ale welcome the recommendation in the NPPF that local authorities introduce policies to safeguard community facilities such as pubs.

Residents from Staining stated that infrastructure is at capacity in the village, and further development will exacerbate this, and will also put further strain on local amenities. A couple of Staining residents stated that light pollution is not identified in the document. A resident of Elswick stated that building in the village would require significant investment in infrastructure.

One resident stated that the road and rail links are inadequate. Another resident stated that development should be focused in areas where infrastructure exists. One respondent stated that the Council should also make developers undertake infrastructure improvements, rather than just requiring contributions.

Medlar with Wesham Town Council stated that all development above set thresholds should contribute towards public realm schemes. Bellway Homes stated that infrastructure considerations alone must not prevent development from taking place. Another respondent stated that all development should not contribute to a Community Infrastructure Levy (CIL), as the CIL would become a tax on planning consents.

11.3 Council's Response

The Council will continue to engage with Blackpool Council as part of the Duty to Cooperate in respect of infrastructure constraints and to agree an appropriate level of future development.

In terms of sewer capacity issues, Planning Officers have met with and will continue to engage with United Utilities to determine the level and phasing of growth that can be delivered across the borough over the Plan period. The Council will also continue

to attend and be informed of the proceedings of the Fylde Peninsula Water Management Group in order to be kept updated on the progress of bathing water quality management on the Fylde Peninsula.

The Preferred Options will propose that all new development incorporates SuDS so that additional surface water does not enter the sewer network. Detailed information in relation to the capacity of the sewer network and the removal of surface water will be included in the Infrastructure Delivery Plan (IDP), which will be available when consultation takes place on the Preferred Options in 2013. The IDP will also include information on the infrastructure that is required in meeting the shortfall of both primary and secondary school places, which is another key issue of the borough that is highlighted in the consultation document.

Before consultation takes place, the Council will inform United Utilities, Lancashire County Council and other major infrastructure providers of the Council's proposed Preferred Options and will invite comments on infrastructure delivery. This will enable any necessary amendments to be made to the Plan before it goes to consultation. As the consultation document states, the IDP will be accompanied by an Infrastructure Schedule that will set out infrastructure projects that will be required to deliver the Plan, including the costs, sources of funding, and phasing.

The Council acknowledges the need to consider the Water Cycle Strategy for Blackpool and Central Lancashire when developing the Preferred Options, and also the need to consider groundwater issues. The Council also notes the findings of the Sport England's Active Places Power – Analysis of Demand and will consider this further as the Infrastructure Delivery Plan is developed.

The Council is aware that a new wastewater treatment works at Singleton is no longer planned, and this has been factored into the draft Infrastructure Schedule that will be available when consultation takes place on the Preferred Options.

Where Plan policies require contributions as part of a planning obligation, the Council will ensure that the requirements of CIL Regulation 122 are complied with. The Council will consider whether to include policies requesting contributions for education, highway access and safety and access to sustainable transport.

The consultation document refers to the preparation of a CIL for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. The Council will engage with Lancashire Constabulary as it develops the CIL, as requested. The requirements of the CIL will be developed as the Plan progresses.

The Council will consider whether light pollution should be included as a policy consideration. It is noted that paragraph 125 of the NPPF states that planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

The Council will consider whether it should include a policy on the provision of community facilities as part of the Preferred Option. In relation to the adequacy of the borough's infrastructure, the Council is required to demonstrate that the proposals of the Local Plan can be supported by the necessary infrastructure. This is the purpose of the forthcoming Infrastructure Delivery Plan, which will support the Local Plan.

11.4 Preferred Option

The Council will continue to engage with infrastructure providers throughout the Plan process to ensure that the Plan is deliverable. Before the Preferred Options consultation takes place, the Council will invite comments from the major infrastructure providers to ensure that the Preferred Options are deliverable, and if not, to investigate potential solutions. If no such solutions can be negotiated, the Plan will need to be amended to ensure it is deliverable.

Q24: Improvements to public realm How can the Council ensure that measures to improve public realm are achieved? Please choose one option.	
Option A	New development adjacent to town centre and identified public realm schemes should be required to provide contributions towards these schemes. (These contributions could be developer contributions or Community Infrastructure Levy).
Option B	All development should be required to contribute towards these schemes.
Option C	Development should not be required to contribute towards these schemes, meaning the Council will need to rely on grant aid becoming available.

11.5 Consultation Responses

There were 112 responses to this question. 106 responses were submitted using the questionnaire. Of these, 69 supported Option B, 23 supported Option A, and 14 supported Option C.

6 responses were submitted by letter and email. Of these, 5 showed support for one of the options: 1 supported Option A and 4 supported Option B. No support was shown for Option C. The other respondent provided comments only.

11.6 Summary of comments on Public Realm

One resident from Staining commented about public realm and stated that people living and working in the area would benefit from public realm improvement.

11.7 Interim Sustainability Appraisal

The Interim Sustainability Appraisal (SA) shows that Option A would have indirect effects on health as it would contribute to creating a high quality built environment. It would also help to enhance community cohesion, and have the potential to benefit biodiversity, historic assets and landscape resources. This option also has the potential to reduce fear of crime through good design and increase urban renaissance through improved vibrancy within town centres.

The SA states that it is unclear as to how economically viable Option B is and whether this option would deter developers. In relation to Option C, the SA states that there are many uncertainties associated with this option because if grant aid is not available for public realm improvements, the benefits recorded for Options A and B would not be realised.

11.8 Council's Response

The Council agrees that the provision of public realm has multiple benefits, and notes that the majority of respondents supported Option B, which would require all development to contribute towards public realm schemes.

11.9 Preferred Option

The approach to public realm will be considered as the Plan develops, taking account of comments received, along with the SA and other considerations.

Q25: Improving connectivity	
How can we ensure that places are properly connected? Please choose which of the following options you support. You may choose more than one option.	
Option A	Ensure new development takes advantage of opportunities to achieve new and improved infrastructure.
Option B	Ensure new development takes advantage of opportunities for increased usage of existing modes of sustainable transport.
Option C	Locate development in fewer locations to provide a critical mass to help attract new funding, infrastructure and to support existing infrastructure.

11.10 Consultation Responses

There were 116 responses to this question. 109 respondents replied using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 68 respondents supported Option A, 35 supported Option C and 29 supported Option B.

7 responses were submitted by letter and email. Of these, 1 respondent supported Option C and the others supported a number of options or provided further comments.

11.11 Summary of comments on Options for Improving Connectivity

Blackpool Council pointed out that the options suggested must be supported by strong policies. Option C is Blackpool Council's least favoured option as it is unlikely to ensure public transport services and highway infrastructure meet everyone's needs.

The CPRE, St Annes on the Sea Town Council and Treales, Roseacre and Wharles Parish Council support all three options.

Bloor Homes also support all three options and add that locating development in fewer locations will make improvements in infrastructure easier to deliver, with private sector operators voluntarily looking to improve services, retail facilities and public transport to serve this larger population.

BAE Systems suggest that the policy test should be to assess the impact of new development on existing transport infrastructure to analyse how the new

development could provide opportunities for improvements, should these be required.

11.12 Interim Sustainability Appraisal

Option A ensures new development takes advantage of opportunities to achieve new and improved infrastructure. This would improve connectivity to employment opportunities and reduce congestion issues over the long term. Although this option may also increase car use if new infrastructure is road-based. In addition, health benefits may also be realised if walking and cycling opportunities are maximised. However, there are limitations as to how far this option would encourage a modal shift away from the private car as it includes road improvements.

Option B does not perform as well against the SA Objectives as Option A as it simply seeks to maximise opportunities to increase the use of sustainable transport and does not include improved infrastructure. Therefore this option may exacerbate current problems with public transport particularly within rural areas where provision is poor.

Option C seeks to locate development in fewer locations in order to provide a critical mass. There are uncertainties as to how viable this option is as achieving critical mass within town centres may not be possible due to limited sites within Lytham and St Annes. It may also lead to rural areas with poor accessibility becoming more isolated, as development would be concentrated elsewhere. This option would not ensure that public transport services and highway infrastructure meet all peoples' needs.

11.13 Council's Response

The Council welcomes the comments received which support ensuring places are properly connected. These comments are noted and will be taken into account at the Preferred Options stage.

11.14 Preferred Option

The Preferred Option is likely to be an amalgamation of the three suggested options. The provision of new and existing transport infrastructure will be considered in the context of opportunities for improvements. A sustainable transport strategy will be developed which maximizes these opportunities. When deciding on the preferred option the Council will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

Q26: Encouraging sustainable travel	
If you support the strategy to encourage more sustainable modes of travel, please choose which of the following options you support. You may choose more than one option.	
Option A	All new developments should be required to provide high quality cycling and walking facilities.

Option B	<p>Improved park and ride facilities should be encouraged.</p> <p>If you support this option, do you support the idea of a park and ride facility at Kirkham and Wesham Station, or do you support the idea of a park and ride facility elsewhere?</p>
Option C	<p>The use of the private car should be discouraged by providing high quality public transport alternatives.</p> <p>If you support this option, do you have any specific suggestions as to how this could be achieved?</p>
Option D	<p>The use of the private car should be discouraged by operating more restrictive parking standards.</p> <p>If you think the parking standards operated by the Council are in need of an update, which particular types of development, or particular standards do you think are in need of revision? The Council's current parking standards are set out in appendix 3.</p>

11.15 Consultation Responses

There were 124 responses to this question. 112 respondents replied using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 87 respondents supported Option C, 80 supported Option A, 75 supported Option B and 2 supported Option D.

78 of the respondents that supported Option B also supported the idea of a park and ride facility at Kirkham and Wesham Station. 7 respondents suggested alternative locations for a park and ride, including Lytham St Annes and the Whitehills area.

7 respondents who supported Option C provided a number of suggestions, including only allowing residential development close or adjacent to existing approved employment, schools and services capable of absorbing the influx and improving public transport timetables to increase the frequency and number of buses at peak times and improving rural services.

7 respondents who supported Option D provided a number of suggestions about how the Council's Parking Standards could be improved, including providing some disc parking to give 1-2 hours free in the town centres and making parking free and provide a viable park and ride scheme where this is not feasible.

12 responses were submitted by letter and email. Of these, 2 respondents supported Option B, 1 supported Option A and 1 supported Option C. The remainder supported a number of options or provided further comments.

11.16 Summary of comments on Encouraging Sustainable Travel

Blackpool Council considers that most of what is suggested could be supported but some suggestions and observations are made:

Option B: Park and ride requires considerable capital investment and revenue support, therefore its long-term sustainability needs to be considered.

Option C: Car use will not be discouraged by public transport investment.

Option D: Parking standards are not intended to discourage car use, but to prevent the waste of land on unnecessary parking, particularly when alternative transport is available.

The CPRE, Sport England, Bloor Homes and Treales, Roseacre and Wharles Parish Council support Options A, B and C and the idea of a park and ride at Kirkham station. St Annes on the Sea Town Council agrees and considers that there should be more park and ride facilities and that priority should be given to public transport at traffic light junctions. They consider that all bus stops should be provided with bus shelters and that there is a need for improved real time displays at bus stops and railway stations. They suggest extending travel card schemes to be used earlier in the day and considering discount on Council Tax for non-car owning families.

Medlar with Wesham Town Council strongly agrees with sustainable travel, especially the case for a park and ride facility at Kirkham and Wesham station, along with a passenger lift.

BAE Systems suggest that the applicability of the various options depends on the location of development and the availability of facilities and infrastructure.

A resident of Fylde pointed out that, whilst 2009 may show a decline in usage of the South Fylde rail line, the following two years have shown an increase of 5% in passenger usage. It was stated that the line has capacity for increased usage but the service does not meet the needs of the public in terms of the level of service offered and does not provide a route into central Blackpool.

A resident of Staining considers that increased advantage should be taken of train services to serve housing estates and towns and reduce congestion on motorways and peripheral roads. Another resident considers that road infrastructure is at capacity and that roads could not support additional public transport.

Hovercraft Services UK point out that they have a vision and proposal for a Hovercraft service between Blackpool, Fylde and Southport.

11.17 Interim Sustainability Appraisal

Options A - D are not directly comparable as they all provide different approaches to encouraging a modal shift away from the private car.

Option A seeks to ensure all new development provides cycling and walking facilities which would not only reduce the dependency on the private car in the long term but would promote healthy lifestyles. In addition, walking and cycling facilities may incorporate landscaping which could provide new habitats for local wildlife.

Option B seeks to encourage improved park and ride facilities which, as Option A, could ultimately lead to a reduction in traffic congestion. Where possible, car park facilities should be located on previously developed brownfield land. The potential park and ride facility at Kirkham and Wesham station would need to be subject to project level environmental assessment in order to determine its effects once its location is known.

Option C seeks to provide high quality public transport alternatives to the private car which would particularly benefit those in more rural areas, as current provision is poor. As with Options A and B, this option could also reduce the dependency on the private car over the long term. In addition, this option may also contribute to

promoting sustainable tourism, as the borough would be more accessible by sustainable modes of transport.

Option D seeks to operate more restrictive parking standards. However, it does not seek to improve access by sustainable modes of transport (as per Options A, B and C). Therefore restricting parking further within Fylde may exacerbate congestion within town centres. In addition, a lack of parking is considered to have contributed to the decline of Lytham and St Annes town centres in the past.

11.18 Council's Response

The Council welcomes the comments received which support ensuring places are properly connected. These comments are noted and will be taken into account at the Preferred Options stage.

As the responsible transport authority in Fylde Borough, Lancashire County Council will be directly responsible for transport planning in Fylde Borough. It is acknowledged that continuing cooperation with all neighbouring authorities is required under the Duty to Cooperate and work is ongoing on the production of a Memorandum of Understanding which will address these strategic cross boundary issues.

The idea of an accessible park and ride facility at Kirkham station will be explored through direct liaison with Lancashire County Council and Network Rail.

The recent increased patronage on the South Fylde rail line is noted. The potential to further increase its usage is something the local plan will encourage.

The Council will ensure that all planned developments contribution to road congestion is minimal.

In response to the proposal for a Hovercraft service, all modes of transport will be considered in producing a plan which facilitates sustainable travel.

11.19 Preferred Option

The Preferred Option is likely to be an amalgamation of three suggested options, namely A, B and C. When deciding on the Preferred Option the Council will take account of the responses to the Issues and Options consultation, emerging national policy, new national and local evidence and the findings of the Sustainability Appraisal.

The Council will continue to engage with public transport providers and transport authorities throughout the Plan process to ensure that the Plan is deliverable.

Q27: Reducing the need to travel	
In order to reduce the need to travel, which of the following options do you support? You may choose more than one option.	
Option A	All new development should provide a mix of uses to help reduce the need to travel.

Option B	New development should be located in areas with existing deficiencies in order to increase the number of facilities reducing the need to travel.
Option C	Live/work units should be encouraged to reflect the greater numbers expected to work from home.

11.20 Consultation Responses

There were 104 responses to this question. 96 respondents replied using the questionnaire. The question allowed the respondent to choose more than one option. Of those who responded using the questionnaire, 63 respondents supported Option A, 59 supported Option B and 44 supported Option C.

8 responses were submitted by letter and email. Of these, most respondents supported a number of options or provided further comments.

11.21 Summary of comments on Reducing the Need to Travel

Blackpool Council supports Option A and suggests that the Plan might further identify Fylde as part of a sub-regional network. This approach would include improvements to the Fylde road network, exploitation of enhanced rail services (including reference to the Northern Hub), accessing possible high speed rail services and the SINTROPHER project's potential to establish a tram-train corridor through the Fylde Coast between Fleetwood, via Blackpool North Railway station, to Preston.

Blackpool Council also points out that, whilst rural buses are discussed in the document, there is little reference to the network provision of Blackpool Transport Services across the sub-region. Reference could also be made to the Fylde's relative transport isolation and the effect this has on its economic viability and attraction to inward investment. In addition, the need to accommodate tourism traffic at Lytham and St Anne's is not mentioned. With regard to paragraph 11.51 of the document, Blackpool Council suggests that the wording 'a trunk road' should be replaced by 'the local highway network'.

St Annes on the Sea Town Council and Medlar with Wesham Town Council agree with all three options, particularly Option B.

Sport England and Treales, Roseacre and Wharles Parish Council support Option B and the CPRE supports Options A and C.

BAE Systems suggest that development may also help to redress a current imbalance within a location. Therefore, although a proposed development would not be a mix of uses it could help to provide a greater mix of uses within a particular location.

Bloor Homes do not support any of the proposed options. Instead they suggest development should be focused on those locations which are already well served by facilities in order to ensure those services remain viable in the long term.

11.22 Interim Sustainability Appraisal

Ensuring that new development provides a mix of uses to help reduce the need to travel (as Option A) could lead to a reduction in carbon emissions, as people would

be less likely to need their car for everyday goods/service. In addition, Option A may also help to develop healthy and cohesive communities with good access to essential services and facilities.

Option B is unlikely to result in the same benefits as Option A. It focuses on a few areas which may improve local facilities within rural settlements where current provision is poor. However, provisions within other areas would not benefit. For example the economy of urban areas may not benefit, nor would the vitality and vibrancy of town centres.

Option C would only benefit a small section of Fylde's population and is unlikely to lead to a significant reduction in car use. This is because the manufacturing sector dominates Fylde's local economy and it is unlikely that those working within this sector would be able to work from home as easily as other professions.

11.23 Council's Response

The Council welcomes the comments received which support reducing the need to travel. These comments are noted and will be taken into account at the Preferred Options stage.

The role of Fylde Borough in the sub-regional network will be further referenced where appropriate. The intention was to reference various sub-regional transport modes in 11.38 – 11.49 of the consultation document.

Connectivity both within and beyond the borough boundary will be developed in conjunction with Lancashire County Council, the responsible transport authority in Fylde Borough. It is acknowledged that continuing cooperation with all neighbouring authorities is required under the Duty to Cooperate and work is ongoing on the production of a Memorandum of Understanding which will address these strategic cross boundary issues.

In consideration of the comments from Blackpool Council about rural buses, relevant public transport providers will be referred to.

The Council will consider referring to the need to accommodate tourism traffic at Lytham and St Anne's. The Council will also consider wording 'a trunk road' as 'the local highway network'.

11.24 Preferred Option

The Preferred Option is likely to be an amalgamation of three suggested options whilst also maximising the potential afforded by existing public transport facilities.

The Council will continue to engage with public transport providers, including Blackpool Transport, throughout the Plan process to ensure that the Plan is deliverable. If the Plan is not considered deliverable and no such solutions can be negotiated, the Plan will need to be amended as required.

12.0 Chapter 12: Development Management

Q28: Development management policies

What Development Management Policies do we need in Fylde? Please limit your suggestions to policies that are not covered by national policies and policies that may be needed because regional policies are being revoked.

Q29: Local interpretation of national policy

Do we need a Development Management Policy to explain a local interpretation of a national policy? If so, what, and why?

12.1 Consultation Responses

Question 28

There were 50 responses to this question. 46 responses were submitted using the questionnaire and 4 responses were submitted by letter and email.

Overall, the majority of support was for the need for Development Management policies.

Question 29

There were 93 responses to this question. 88 responses were submitted using the questionnaire. Of these responses, 54 voted 'yes' and 34 voted 'no'.

5 responses were submitted by letter and email. Of these 4 voted 'yes' and 1 voted 'no'.

Overall, the majority of support was for further policy to explain a local interpretation of national policy.

12.2 Summary of comments on Development Management Policies

Many responses to the two questions overlapped and are therefore dealt with collectively below.

There was a general consensus that local policy was required and that it needed to explain a local interpretation of national policy. Bloor Homes was only respondent that disagreed, stating there was adequate national policy.

The CPRE suggested that there is a requirement to include criteria based policies that are covered in the soon to be revoked Regional Spatial Strategy (RSS). The CPRE drew particular attention to: RDF3, DP4-DP9, W7, RT2, RT9, EM1, EM3, EM5, EM6, EM11, EM15-EM16, the final aspect of EM17 and the supporting text of 9.23-9.24. The CPRE also suggested that the Statement of Community Involvement should be retained after the RSS is revoked. Furthermore, CPRE suggest local interpretation of NPPF is required to cover core planning principles of paragraph 17; paragraph 23 on town centres and markets; paragraph 76-78 on local green spaces;

paragraph 109 on valued landscapes; paragraph 123 on areas of tranquility and on details to replace PPS25.

The National Trust suggest a more detailed policy relating to environmental resources is required, including landscape and the coast, as per the current RSS Policy EM1 and its sub-parts.

St Annes on the Sea Town Council suggested that a policy is needed to limit betting shops, charity shops and takeaways except in the café quarter. They also state that it should include a policy to encourage specialism in individual and unique retailers. A further respondent suggested the need for a policy to provide guidance on use classes and sui generis. St Annes on the Sea Town Council suggest local interpretation of national policy should not create additional layers of bureaucracy.

Treales, Roseacre & Wharles Parish Council support the need for policy to explain local interpretation of national policy.

NHS North Lancashire partner on Fylde Local Strategic Partnership (LSP) suggest all development should include health needs assessment. The Council's Head of Community Services stated that new development above a certain threshold should require a Health Impact Assessment, and she made reference to policy 23 of the adopted Central Lancashire Core Strategy which is designed to reduce health inequalities.

Sport England advocate a separate policy for sport and recreation, rather than a generic open space policy.

A range of comments were received on the structure of the document. A key message was that the document should be simpler and user friendly, and have criteria based policies to allow developers to assess proposals, and also that it should not be overly prescriptive. Comments stated that the full set of updated policies should be maintained and should link and take account of Neighbourhood Plans. Many respondents from Staining said the document should plan beyond 2030 due to its potential long term effects. A respondent suggested that there should be one main policy and another respondent said the policies should be developed by qualified experts who are accountable for their decisions.

Respondents suggested that the NPPF is too broad and specific policy is needed for local circumstances. A respondent suggested that the existing Local Plan only requires a few amendments to comply with the NPPF and that it is required quickly to prevent unwarranted and unwanted development.

Many respondents suggested a policy was needed regarding areas that are considered appropriate for development. It was suggested that development should be restricted to infill and brownfield sites to protect agricultural land and respect and conserve individual character.

Many respondents suggested that development should take place where there is an identified need and that the parish council can assist with this. Respondents also stated that development should only occur where there is employment, infrastructure and frequent sustainable transport, or where these elements can be upgraded.

A respondent suggested that there is a requirement for a community facilities policy which protects existing community and social facilities unless a replacement facility is provided on site or within the vicinity which meets local need. Provision of new

community, social, leisure and cultural facilities should be sought with contributions via Section 106 and/or CIL.

A housing developer suggested that a positive policy to warrant sheltered housing would release existing market housing.

12.3 Council's Response

The Council welcomes the comments received, in particular the suggested themes local policy should cover and need for local interpretation. It is clear from the consultation responses that Development Management Policies are required.

To date, work has been undertaken to explore potential policy gaps which could be created upon revocation of the RSS. A similar exercise will be undertaken to explore policy gaps in the NPPF which local policy will need to cover to address Fylde's development and land use needs. These two work streams will form the foundations for developing draft development management policies. As part of this process, officers will explore the need for a policy to cover use classes, sheltered housing, protection of community facilities, sport and recreation policy and health impact assessments.

The Council agrees that the development management policies should be simple and user friendly. Officers and customers will have to become more reliant on NPPF as a streamlined approach will not include policies which attempt to cover all eventualities. The Council agrees that reference should be made to Neighbourhood Planning and that the Statement of Community Involvement should be retained.

With regard to the plan period being extended beyond 2030, government guidance requires councils to plan for 15 years from adoption. A Sustainability Appraisal is being produced alongside the Local Plan and this will suggest ways to mitigate negative impacts and maximise positive benefits. The Council will consult upon the Sustainability Appraisal alongside the different stages of Local Plan production.

The Council notes the point that the Local Plan should be developed quickly to avoid unwanted development pressure. Unlike the previous system, the Local Plan will gain weight as it moves forward in the plan process.

With regard to community facilities, the consultation document states that the Council will be producing an Infrastructure Delivery Plan which will look at social infrastructure including education, health, telecommunication and community facilities. The consultation document refers to the preparation of a CIL for the borough, which will require contributions towards infrastructure maintenance and provision in the borough. The Preferred Option will include phasing to allow for necessary infrastructure to be provided ahead of development. The Infrastructure Delivery Plan will form the foundations of the CIL.

12.4 Preferred Option

The Preferred Option will include draft development management policies. The Council will take account of the comments put forward in the consultation responses and other comments while exploring draft policies. The Council's Development Management Officers will be actively involved in policy formation and testing. This will ensure the policies are workable and address the development and land use issues in the borough.

Appendix 5

Preferred Option 2013: Consultation Material



Plan for Fylde - Plan for the Future

Fylde Local Plan to 2030: Part 1

Preferred Options Consultation

Starts 27th June - Ends 5.00pm on 22nd August 2013



Housing



Employment



Housing & Employment



School

- 6,800 new homes
- 49 hectares of new employment land
- Strategic Development at: Lytham and St Annes, Kirkham and Wesham, Blackpool periphery and Warton
- New infrastructure, services and facilities
- Policies for making decisions on planning applications

Fylde Council is producing a document called the Local Plan to guide development in the borough to 2030. It will ensure new homes, jobs and services are located in the most sustainable locations, along with the necessary infrastructure and facilities.

The Local Plan should accord with national planning guidance which promotes sustainable development. Not planning for development is not an option, as this is not sustainable. Failing to plan for development in line with Fylde's assessed development needs could lead to unplanned development being approved at planning appeals.

The Council has developed its Preferred Options for planning Fylde's future and we are keen to seek your views.



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Ordnance Survey (100006084).

How much development are we planning for and where?

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New development will be focused within the existing settlement boundaries and important features, such as public open space will be protected. However, there is insufficient land in settlements for all of the development needed and some development must occur on the edge of existing settlement boundaries and at Blackpool periphery.

The Preferred Options document identifies potential sites for housing, employment and mixed use development, with the majority of the development focused at four strategic locations: Lytham and St Annes, Kirkham and Wesham, Blackpool periphery, and Warton.

The Preferred Options document also includes policies which aim to meet the issues identified at earlier public consultations, including on matters relating to housing, transport, infrastructure, flooding and the environment.

Have Your Say

To find out further information on what the proposals mean for your local area and to submit your comments, come to a drop in event listed below, visit Fylde Direct at St Annes, visit libraries across Fylde Borough or go online.

Date	Venue	Time
Monday 1st July	Lytham -Lytham Assembly Rooms, Dicconson Terrace, FY8 5JY	3.00pm - 7.00pm
Wednesday 3rd July	St Annes - United Reformed Church Hall, Clifton Drive North, FY8 2AE	3.00pm - 7.00pm
Thursday 4th July	Warton - Warton Village Hall, Church Road, PR4 1BD	3.00pm - 7.00pm
Monday 8th July	Blackpool Periphery - St Monica's Roman Catholic Church, Little Marton, FY4 4FA	3.00pm - 7.00pm
Tuesday 9th July	Wesham - Wesham Community Centre, Church Road, PR4 3DQ	3.30pm - 7.00pm
Wednesday 10th July	Elswick - Elswick Village Hall, Roseacre Road, PR4 3UD	3.00pm - 7.00pm
Thursday 11th July	Kirkham - Kirkham Community Centre, Mill Street, PR4 2AN	3.00pm - 6.00pm
Tuesday 16th July	Westby - St Matthew's Church, West Moss Lane, Ballam, FY8 4NQ	3.00pm - 7.00pm
Thursday 18th July	Staining - St. Luke's Church Hall, Staining Road, FY3 0BW	3.00pm - 7.00pm

For further information, please contact the Planning Policy Team:

Planning Policy, Fylde Council, Town Hall, Lytham St Annes, FY8 1LW

Tel: 01253 658418 Email: planningpolicy@fylde.gov.uk

Fylde Forum: www.fyldeforum.co.uk

www.fylde.gov.uk/localplan/



For more information on the Local Plan, please scan this QR Code with a Smartphone.



Plan for Fylde - Plan for the Future

Fylde Local Plan to 2030: Part 1

Preferred Options

Consultation

Starts 27th June

Ends 5.00pm on 22nd August 2013



Fylde Council is producing a document called the Local Plan to guide development in the borough to 2030. It will ensure new homes, jobs and services are located in the most sustainable locations, along with the necessary infrastructure and facilities.

- **6,800 new homes**
- **49 hectares of new employment land**
- **Strategic Development at Lytham and St Annes, Kirkham and Wesham, Blackpool periphery and Warton**
- **New infrastructure, services and facilities**
- **Policies for making decisions on planning applications**



For more information on the Local Plan, please scan this QR code with a smartphone.

Fylde Council. (c) Crown Copyright and database right (2013). Ordnance Survey (100004084).



The Council is keen to seek your views on the Preferred development options for planning Fylde's future. To find out further information and comment, come to a drop in event listed below, visit Fylde Direct at St Annes, visit libraries across Fylde Borough or go online.

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For further information, please contact the Planning Policy Team: **01253 658418**, or email planningpolicy@fylde.gov.uk

www.fylde.gov.uk/localplan/



Plan for Fylde - Plan for the Future

Fylde Local Plan to 2030: Part 1 **Summary Leaflet**

Preferred Options Consultation

Starts 27th June - Ends 5.00pm on 22nd August 2013



Fylde Council is producing a document called the Local Plan to guide development in the Borough to 2030. It will ensure new homes, jobs and services are located in the most sustainable locations, along with the necessary infrastructure and facilities.

The Council has developed its Preferred Options for planning Fylde's future and we are keen to seek your views.

This leaflet provides a summary of the proposals and describes how you can submit your comments.

- 6,800 new homes
- 49 hectares of new employment land
- Strategic Development at:
Lytham and St Annes,
Kirkham and Wesham,
Blackpool periphery and Warton
- New infrastructure, services and facilities
- Policies for making decisions on planning applications

2 | Fylde Local Plan Preferred Options June 2012 Summary Leaflet

Why should you get involved?

Planning shapes the places where we live, work and socialise. It improves the social, economic and natural environment of communities.

The Council is required to produce a document called the Fylde Local Plan to guide development in the Borough to 2030.

When adopted it will eventually replace the current adopted Fylde Borough Local Plan (As Altered: October 2005) and will be used to determine planning applications, allowing the Council to direct development where we want it to go and resist unsuitable developments.

The Council is keen to seek your views on the Preferred Options for planning Fylde's future.

What is the Preferred Options document?

The Preferred Options document contains a vision and development strategy that sets out how the Council would like the Borough to look in 2030. The development strategy includes the following:

- Spatial distribution of housing development and employment land, with a focus on four strategic locations at: Lytham and St Annes; Blackpool periphery; Kirkham and Wesham; and Warton.
- Strategic sites at the strategic locations for housing and employment development.
- Policies for making decisions on planning applications to address the key issues you identified.

www.fylde.gov.uk/localplan/

So far...

Over the last few years, we have consulted you at key stages of the production process. The last consultation was held in June 2012 when we asked you for your thoughts on a number of options for addressing the key issues you identified.

Your comments have been considered and the Council has considered latest government policy and new evidence. This has helped the Council draft its Preferred Options.



Following adoption of the Fylde Local Plan to 2030: Part 1, the Council will commence work on Part 2: Site Allocations. The Part 2 will allocate land for small sites for a range of land uses.

The Part 2: Site Allocations will follow a similar production process as the Part 1 document and is planned for adoption in 2016.

The Local Plan is supported by relevant up to date information, which is referred to as the 'evidence base'.

The Local Plan is subject to several technical assessments during its preparation. We are also keen to seek your views on the technical assessments.

Why is the Council planning for development?

The Council's Local Plan will comply with national planning guidance (called the National Planning Policy Framework) which has a presumption in favour of sustainable development. Sustainable means "ensuring that better lives for ourselves don't mean worse lives for future generations" and development means "growth".

Not planning for development is not an option, as this is not sustainable. Failing to plan for development in line with Fylde's assessed development needs could lead to unplanned development being approved at planning appeals.

Sustainable development is about positive growth – making economic, environmental and social progress for this and future generations. Planning for development is about helping to make this happen.



How much development are we planning for?

The Preferred Options document proposes that 6,800 new homes and 49 hectares of employment land will be developed in the Borough between 2011 and 2030.

New development will be focused within the existing settlement boundaries and important features such as public open space will be protected. However, there is insufficient land in settlements for all of the development needed and some development must occur on the edge of existing settlement boundaries and at Blackpool periphery.

The land the Council proposes to allocate will be situated on the edge of existing settlements so that the new development is located where existing infrastructure and services are available or could be enhanced. Green Belt, areas at greatest risk of flooding and protected landscapes have not been proposed for development.



Will the infrastructure cope?

Understanding whether there is sufficient infrastructure available (for example, transport, energy, water and sewer capacity, school places, doctors, parks and open spaces) is one part of the evidence base informing the Fylde Local Plan.

The Council is required to produce an Infrastructure Delivery Plan alongside the Fylde Local Plan. This sets out the infrastructure required to deliver the development proposed in the preferred options. We are also keen to seek your views on the draft Infrastructure Delivery plan.

It will be necessary to phase development so that it coincides with the construction, upgrading or expansion of certain types of infrastructure. Without the necessary infrastructure, development could not take place.



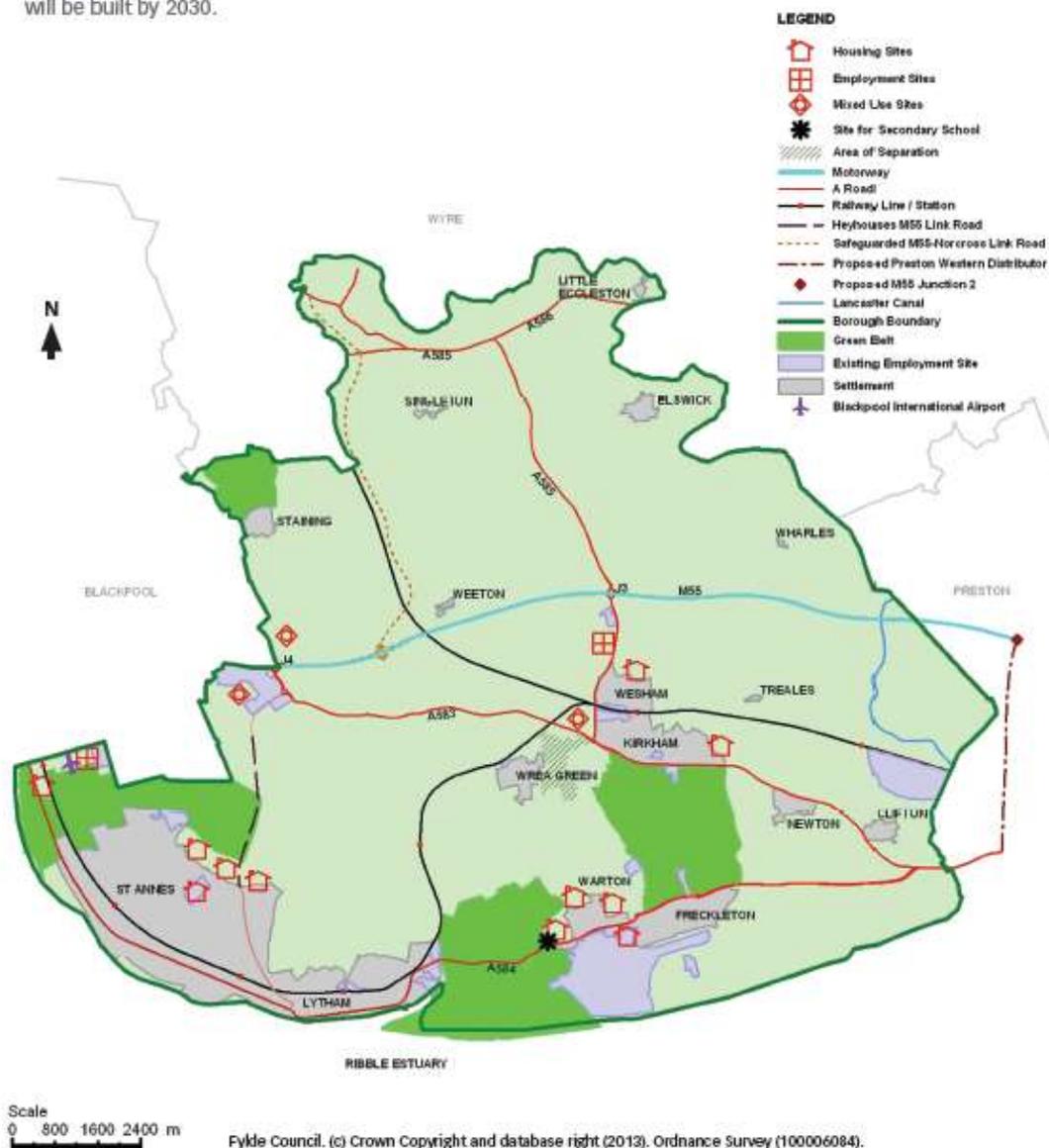
4 Fylde Local Plan Preferred Options June 2012 Summary Leaflet

What does this mean for where you live?

The Council's Preferred Options document identifies potential sites for housing, employment and mixed use development, with the majority of the development focused at four strategic locations:

- Lytham and St Annes,
- Blackpool periphery,
- Kirkham and Wesham,
- Warton.

Many of the proposed sites for residential development will not be completed within this plan period and their construction will continue beyond 2030. The number of new homes included in this summary leaflet only includes the number of new homes which will be built by 2030.



Lytham and St Annes

1,675 new homes proposed:

- Land at Queensway (860 homes)
- Former EDS site, Heyhouses Lane (335 homes)
- Land West of North Houses Lane (340 homes)
- Land North of Moss Hall Lane (140 homes)

New public open space will be provided at Queensway.

Proposed Heyhouses M55 Link Road will be provided and traffic congestion created by the developments will be resolved on all impacted corridors.

Infrastructure improvements to meet wastewater and water supply demand will be necessary.

A new primary school will be provided as part of Queensway development. Further primary school provision will be required if housing demand and births continue to rise.

Secondary school provision in Lytham and St Annes is almost at capacity. A new secondary school is proposed to the West of Warton to serve Lytham, St Annes and Warton school catchment area.

Kirkham and Wesham

775 new homes proposed and 13 hectares of employment land:

- Land North of Mowbreck Lane (240 homes)
- Land North of Dowbridge (240 homes)
- Land North of Blackpool Road (295 homes & 9 hectares of employment land)
- Land west of Fleetwood Road (4 hectares of employment land)

Employment development will be in sustainable locations and assist in diversifying the Borough's economic base, creating high quality, readily available sites.

Infrastructure improvements to meet wastewater and water supply demand will be necessary.

Traffic congestion created by the developments will be resolved on all impacted corridors.

A Park and Ride scheme at Kirkham and Wesham Railway station, along with approved access to station platforms is proposed.

Primary and secondary school provision is projected to be sufficient within a five year period. If housing demand and births continue to rise, additional schools places will need to be provided.

Warton

1,160 new homes proposed:

- Former GEC Marconi Factory Sites (240 homes)
- Land East of Warton (380 homes)
- Land North of Warton (180 homes)
- Land West of Warton (360 homes)

A new secondary school is proposed to the West of Warton to serve the Lytham, St Annes and Warton catchment area.

A new link road (the Preston Western Distributor) providing access to a new junction 2 of the M55 and better access to the centre is proposed.

Infrastructure improvements to meet wastewater and water supply demand will be necessary.

Development would assist in providing new improved local facilities and an improved local centre. This could include new shops, a Doctors surgery, pharmacy and other community facilities.

Blackpool Periphery

1,085 new homes proposed and 36 hectares of employment land:

- Former Pontins Holiday Centre (275 homes)
- Land East of Cropper Road (250 homes & 11 hectares of employment land)
- Whyndyke Farm (560 homes & 20 hectares of employment land)
- Land at Blackpool International Airport (5 hectares of employment land)

Development at Whyndyke Farm and land East of Cropper Road is envisaged to produce a critical mass to enable required services to be provided.

Employment development will assist in diversifying the Borough's economic base, creating high quality, readily available sites.

Infrastructure improvements to meet surface water issues will be necessary.

Improvements to Junction 4 of the M55 may be necessary.

The Council has already approved planning permission for housing developments since the plan period commenced in May 2011. These dwellings will count towards the Local Plan's housing requirement.

What will happen elsewhere outside the Strategic Locations?

We do not plan to undertake a strategic review of the Green Belt or develop in areas at highest risk of flooding, therefore development in Freckleton will be limited to infill.

Following adoption of the Fylde Local Plan to 2030: Part 1, The Local Plan Part 2: Site Allocations to 2030 will identify small development sites. This may include some development at the four strategic areas and also in Freckleton and at rural villages. The Site Allocations to 2030 document will make allocations for around 60 homes per year, starting in 2017 to 2030.

Ahead of adoption of the Local Plan Part 2: Site Allocation to 2030, the Council proposes that planning applications for residential development within the rural villages will only be permitted if there are other material considerations.

The Local Plan also makes an allowance for Windfall sites as the Council is aware that some sites may unexpectedly become available and be suitable for housing. The Council has made an allowance for around 30 homes per year as the fabric of the area suggest that there is potential for windfall sites coming forward.

We also want to know what you think about our policies for making decisions on planning applications

In previous consultations, we have asked you the issues that affect you and requested your comments on which options we should take forward. The Preferred Options document includes policies which aim to meet the issues you identified. A summary of some of the policies is provided below. Full details of the policies can be found in the full Preferred Options consultation document.

In General

- A area of separation between Kirkham and Wrea Green will protect settlement identity.
- Mixed use developments will be promoted to facilitate flexible live/work environments.

Economy

- Existing employment land will be protected and new employment land will be provided to support the local economy.
- Sustainable growth and expansion of rural businesses will be supported.
- Retail and Town centre uses will be encouraged in defined town centres.
- Town centre management plans will address the function and accessibility of each town centre, including potential public realm schemes.
- Leisure, culture and tourism including appropriate rural tourism will be promoted.

Housing

- Small family homes with private gardens and specialist retirement accommodation will be supported, however land will be used efficiently.
- 30% of housing will be affordable housing for urban market housing schemes of 15 homes or more and rural market housing schemes of 4 homes or more.
- There is a policy for Gypsies, Travellers and Travelling Showpeople Sites.

Infrastructure, Transport and Services

- Community facilities will be protected and new facilities provided to meet increased demand from development.
- Strategic highway improvements at: the M55 to Norcross Link road; the M55 to Heyhouses Link Road; and M55 junction 2 and Preston Western Distributor will be supported.
- Sustainable transport will be encouraged with improvements in public transport in rural areas and upgrade to the South Fylde railway line.

Environment and heritage

- Protect the environment and biodiversity.
- Flood risk impacts of all new development will be minimised.
- There is a policy for renewable and low carbon energy generation.
- Protect the character of the open coastline.
- A heritage strategy and action plan will deal with the Borough's heritage assets.
- New development will be of the highest design standards and consider local character and appearance.
- Provide a landscape buffer for development that impacts upon land outside settlement boundaries.



Have Your Say

We want to hear from you. There are a number of ways you can submit your comment forms.

Comment forms must be received by **5pm on Thursday 22nd August 2013**. We can not guarantee that comment forms received after the deadline will be considered.

If you require assistance in formulating and submitting your consultation comments, please contact the Planning Policy Team. You can also contact your local ward Councillor for further advice.

If you would like to be added to the Register of Consultees to be kept informed of progress on the Local Plan, please contact the Planning Policy team with your contact details.



Submit your comment form:

Online: The easiest and quickest way to complete the comment form

www.fylde.gov.uk/localplan/

Email: Your completed comment form to: planningpolicy@fylde.gov.uk

Post: Your completed comment form to:

FREEPOST BJ952
Preferred Options Consultation
Planning Policy
Fylde Council
Town Hall,
Lytham St Annes,
Lancashire
FY8 1LW



View the full document

The full document including supporting information is available online, at Fylde Direct in St Annes and at libraries across Fylde Borough.

Next Steps...

Your comments will be considered alongside the findings of the Technical Assessments and updated evidence, including infrastructure constraints. Greater weight will be given to consultation comments that are supported by evidence

A Publication document will be produced and there will be a final round of public consultation on the soundness of the Local Plan Part 1.

The Local Plan Part 1 will be submitted to the Secretary of State, along with the comments made on the document and an Examination in Public will be held. This will give an independent Planning Inspector the opportunity to test the soundness of the document, in terms of the Local Plan's justification, effectiveness and consistency with national policy.

Design & Print Centre, Preston City Council GRA01365



For further information, please contact the Planning Policy Team:

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

Tel: 01253 658418

Email: planningpolicy@fylde.gov.uk

Fylde Forum: www.fyldeforum.co.uk



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If you want this information in large print, audio, Braille or another language please call 01256 658658

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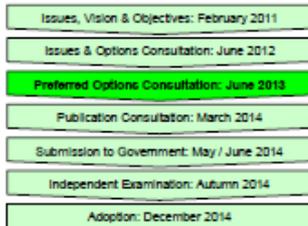
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 - Blackpool periphery;
 - Kirkham and Wesham;
 - Warton.
- Strategic sites at the strategic locations for housing and employment development.
- Policies for making decisions on planning applications to address the key issues you identified.

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Next Steps...

Your comments will be considered alongside the findings of the Technical Assessments and updated evidence, including infrastructure constraints. Greater weight will be given to consultation comments that are supported by evidence.

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The Local Plan Part 1 will be submitted to the Secretary of State, along with the comments made on the document and an Examination In Public will be held. This will give an independent Planning Inspector the opportunity to test the soundness of the document, in terms of the Local Plan's justification, effectiveness and consistency with national policy.

Following adoption of the Fylde Local Plan to 2030: Part 1, the Council will commence work on Part 2: Site Allocations. The Part 2 will allocate land for small sites for a range of land uses.

The Part 2: Site Allocations will follow a similar production process as the Part 1 document and is planned for adoption in 2016.

What if I have any further queries?

If you have a query about any aspect of this consultation please contact the Planning Policy Team on 01253 658418 or email planningpolicy@fylde.gov.uk

How to Comment

The consultation period runs from 27 June 2013 until 5:00pm on 22 August 2013.

The Consultation Document is available online at www.fylde.gov.uk/localplan/ or paper copies are available to view at Fylde Direct at St Annes and at libraries across Fylde. The document is also available on CD.

There are a number of ways you can comment on the Fylde Local Plan to 2030: Part 1 – Preferred Options

* Online: You may find it easiest and quickest to respond online. You can access the online consultation using the following link: www.fylde.gov.uk/localplan/

* By post or email: You can send your comments by post or email (quoting the relevant chapter and paragraph number where appropriate) to the address below.

FREEPOST BJ862
Preferred Options Consultation
Planning Policy
Fylde Council
Town Hall
Lytham St Annes
Lancashire
FY8 1LW

planningpolicy@fylde.gov.uk



Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 27 June 2013

Dear Sir/Madam

FYLDE LOCAL PLAN TO 2030: PART 1 PREFERRED OPTIONS CONSULTATION IN ACCORDANCE WITH REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

I am writing to inform you that the Fylde Local Plan to 2030: Part 1 Preferred Options will be published for consultation, along with accompanying technical assessments, for the eight week period 27 June to 22 August 2013.

The Council is producing a Local Plan which will guide development in the borough to 2030. It will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. The Fylde Local Plan to 2030: Part 1 is the first of two documents that will make up the Local Plan, including strategic policy, development management policies and development sites within strategic locations. The Part 2 document will include smaller development sites in the urban and rural areas and define areas of open space and town centre boundaries.

The Preferred Options is an important stage in the preparation of the Local Plan Part 1. They will be available for public discussion at a series of drop in community engagement events starting on 1 July:

Date	Location	Time
Monday 1 July	Lytham – Lytham Assembly Rooms, Dicconson Terrace, FY8 5JY	3pm – 7pm
Wednesday 3 July	St Annes - United Reformed Church Hall, Clifton Drive North, St Annes, FY8 2AE	3pm – 7pm
Thursday 4 July	Warton - Warton Village Hall, Church Road, PR4 1BD	3pm – 7pm
Monday 8 July	Blackpool Periphery – St Monica's RC Church Hall, St Monica's Way, Little Marton, Blackpool, FY4 4FA	3pm – 7pm
Tuesday 9 July	Wesham – Wesham Community Centre, Church Road, Wesham, PR4 3DR	3.30pm – 7pm
Wednesday 10 July	Elswick - Elswick Village Hall, Roseacre Road, PR4 3UD	3pm -7pm
Thursday 11 July	Kirkham - Kirkham Community Centre, Mill Street, PR4 2AN	3pm – 6pm
Tuesday 16 July	Westby - St Matthew's Church, West Moss Lane, Ballam, FY8 4NQ	3pm – 7pm
Thursday 18 July	Staining - St Luke's Church Hall, Staining Road, Staining, FY3 0BW	3pm – 7pm

The Preferred Options document, including the supporting technical assessments (Sustainability Appraisal, Habitats Regulations Assessments Screening Report, Health and Equalities Impact Assessment, Rural Proofing and Draft Infrastructure Delivery Plan) will be available for inspection at www.fylde.gov.uk/localplan/ at Fylde Direct and at libraries throughout the Borough for the duration of the consultation. Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

The quickest and easiest way to submit comments is by using our online interactive consultation system. You will be able to save draft comments as well as view comments made by other consultees. You can access the online system by using the following link: www.fylde.gov.uk/localplan/

Comments can be submitted in a number of other ways:

- The comments form at www.fylde.gov.uk/localplan/ can be emailed to us at planningpolicy@fylde.gov.uk
- Comments forms can also be free posted to us at FREEPOST BJ952, Preferred Options Consultation, Planning Policy, Fylde Council, Town Hall, Lytham St Annes, FY8 1LW

The deadline for submitting comments is **5pm, Thursday 22 August 2013**. Please note the Council cannot guarantee that any comments received after the consultation deadline will be considered.

If you require assistance in formulating and submitting your consultation comments, or have a query about any aspect of this consultation, please do not hesitate to contact the Planning Policy Team on 01253 658418, email planningpolicy@fylde.gov.uk or send a message to Fylde Forum at www.fyldeforum.co.uk You can also contact your local ward Councillor for further advice.

Please note that all responses must contain your contact details. Comments cannot be treated as confidential. All responses will be published on our website, although we will not publish any personal details. We will take your comments plus the results of the technical assessments and any emerging evidence, into account in preparing the next stage of the Local Plan Part 1. Greater weight will be given to comments that are supported by evidence.

You are receiving this letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01253 658418 or email planningpolicy@fylde.gov.uk

Yours faithfully,



Julie Glaister
Planning Policy Manager

Advert:

FYLDE LOCAL PLAN TO 2030: PART 1 PREFERRED OPTIONS CONSULTATION IN ACCORDANCE WITH REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

The Fylde Local Plan to 2030: Part 1 Preferred Options will be published for consultation, along with accompanying technical assessments, for the 8 week period **27 June to 22 August 2013**.

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Thursday 18 July	Staining - St Luke’s Church Hall, Staining Road, Staining, FY3 0BW	3pm – 7pm

The Local Plan Part 1 Preferred Options document, including the supporting technical assessments (Sustainability Appraisal, Habitats Regulation Assessment Screening Report, Health and Equalities Impact Assessment, Rural Proofing Assessment and draft Infrastructure Delivery Plan) will be available for inspection at www.fylde.gov.uk/localplan/ Fylde Direct, Public Offices, 290 Clifton Drive South, Lytham St Annes, Lancashire between the hours of 9.00am and 4.30pm and at libraries throughout the Borough for the duration of the consultation (see www.lancashire.gov.uk/libraries/librarydetails for opening hours).

The quickest and easiest way to submit comments is by using our online interactive consultation system. You will be able to save draft comments as well as view comments made by other consultees. You can access the online system by using the following link: www.fylde.gov.uk/localplan/

Comments can be submitted in a number of other ways:

- The comments form at www.fylde.gov.uk/localplan/ can be emailed to us at planningpolicy@fylde.gov.uk
- Comments forms can also be free posted to us at FREEPOST BJ952, Preferred

Options Consultation, Planning Policy, Fylde Council, Town Hall, Lytham St Annes,
FY8 1LW

The deadline for submitting comments is **5.00pm Thursday 22 August 2013**.

If you require assistance in formulating and submitting your consultation comments, or have a query about any aspect of this consultation, please contact the Planning Policy Team on 01253 658418, email: planningpolicy@fylde.gov.uk or send a message to www.fyldeforum.co.uk. You can also contact your local ward Councillor for further advice.

Signed Mark Evans, Head of Planning and Regeneration
On behalf of Fylde Council

Date: 27th June 2013

Press release:



Date: 27 June 2013

Ref:

Press Release

Have your say on planning Fylde's future

The Council is producing a Local Plan which will guide development in the borough to 2030. It will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. The Fylde Local Plan to 2030: Part 1 is the first of two documents that will make up the Local Plan, including strategic policy, development management policies and development sites within strategic locations. Part 2 will include smaller development sites in the urban and rural areas and define areas of open space and town centre boundaries.

Councillor Trevor Fiddler, Fylde Council cabinet member for Planning and Development, said: "The Local Plan is intended to ensure that future building and development in the borough meets people's needs.

"I hope that as many people as possible will take a look and have their say: it is a hugely important document.

"Development can't be random. It has to be planned for people's needs. When the Plan is finally adopted at the end of 2014 – we will be able to steer developers in the direction we want them to go.

"Its adoption will give the council the legal authority needed to refuse unsuitable development.

"No area can stand still forever. We want change, however, to be sympathetic to the distinctive character and heritage of the area."

Councillor Fiddler added: "It is vital for everyone's sake that we get this right. We are making the process as open as possible and I urge people to take a look and tell us what they think."

The preferred options for the Local Plan: Part 1 will be open for public discussion at the following 'drop-in' events between 1 and 18 July:

	Location	Time
Monday 1 July	Lytham – Lytham Assembly Rooms, Dicconson Terrace, FY8 5JY	3pm – 7pm
Wednesday 3 July	St Annes - United Reformed Church Hall, Clifton Drive North, St Annes, FY8 2AE	3pm – 7pm
Thursday 4 July	Warton - Warton Village Hall, Church Road, PR4 1BD	3pm – 7pm
Monday 8 July	Blackpool Periphery – St Monica’s RC Church Hall, Little Marton FY4 4FA	3pm – 7pm
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Tuesday 16 July	Westby – St Matthew’s Church, West Moss Lane, Ballam, FY8 4NQ	3pm – 7pm
Thursday 18 July	Staining - St Luke’s Church Hall, Staining FY3 0BW	3pm – 7pm

Attendance at the events will be reviewed and further events may be arranged if necessary.

The preferred options consultation document and supporting technical assessments will be available for inspection at www.fylde.gov.uk/localplan/ in Fylde Libraries and at Fylde Direct on Clifton Drive South in St Annes.

The quickest and easiest way to submit comments is by using our online interactive consultation system. You will be able to save draft comments as well as view comments made by other consultees. You can access the online system by using the following link: www.fylde.gov.uk/localplan/

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- Send a message to Fylde Forum at www.fyldeforum.co.uk

The deadline for submitting comments is **5.00 pm Thursday 22 August 2013**.

If you require assistance in formulating and submitting your consultation comments, or have a query about any aspect of this consultation, please do not hesitate to contact the Planning Policy Team on 01253 658418, email planningpolicy@fylde.gov.uk or send a message to www.fyldeforum.co.uk You can also contact your local ward Councillor for further advice.

This is your chance to be involved in shaping Fylde’s future.

Notes to editors: For more information about this press release, please call Mark Evans, Head of Planning and Regeneration on 01253 658460 or Julie Glaister Planning Policy Manager on 01253 658687

Fylde Local Plan to 2030: Part 1

Preferred Options



Comments Form

Office Use only

Ref:

Date Received:

Date Acknowledged:

If you have any comments you wish to make regarding the Preferred Options document, the quickest and easiest way is by using our NEW online interactive consultation system. You will be able to save draft comments as well as view comments made by other consultees. You can access the online consultation by using the following link: www.fylde.gov.uk/localplan/

If you prefer to use this form you can post it to us using the FREEPOST address at the bottom of the page or you can email it to us at planningpolicy@fylde.gov.uk

The Preferred Options document, including the supporting technical assessments (Sustainability Appraisal, Habitats Regulations Assessments Screening Report, Health and Equalities Impact Assessment, Rural Proofing and Draft Infrastructure Delivery Plan) will be available for inspection at www.fylde.gov.uk/localplan/, at Fylde Direct and at libraries throughout the Borough for the duration of the consultation. Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

The deadline for consultation responses is **5pm on Thursday 22 August 2013**. Please note the Council cannot guarantee that responses received after the consultation deadline will be considered.

All comments must be submitted in writing and must contain a name and address. Comments cannot be treated as confidential. All comments will be published on our website, although we will take care not to publish any personal details. We will take all comments, the results of the technical assessments and any emerging evidence into account in preparing the next stage of the Local Plan Part 1. Greater weight will be given to comments that are supported by evidence.

If you require assistance in formulating and submitting your consultation comments, or have a query about any aspect of this consultation, please contact the Planning Policy team on 01253 658418, email planningpolicy@fylde.gov.uk or send a message to Fylde Forum at www.fyldeforum.co.uk You can also contact your local ward Councillor for further advice.

Please complete this comments form and return it no later than 5pm, 22nd August 2013. Please note the Council cannot guarantee that responses received after the consultation deadline will be considered.

By Email: planningpolicy@fylde.gov.uk

By Post: FREEPOST BJ952,
Preferred Options Consultation,
Planning Policy,
Fylde Council,
Town Hall,
Lytham St Annes,
Lancashire,
FY8 1LW

Contact Details: Please provide us with your full contact details. We regret that we are unable to process any responses supplied without these details.

	Personal Details	Agent Details
Title		
First Name		
Last Name		
Organisation (where appropriate)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

(If yes, please tick)

Do you wish to be kept informed of the further stages of this Development Plan Document?	
Do you wish to be involved in future planning consultations?	

Signature: _____ **Date:** _____

Data Protection

Your contact details will not be released to any third parties and will only be used for the purposes of the Fylde Local Plan. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.

If you want this information in large print, audio, Braille or another language please call 01253 658658

Please use a separate box for each site, policy or paragraph you wish to comment on and continue on a separate sheet if necessary.

**Comments relating to the Fylde Local Plan to 2030: Part 1
Preferred Options Document**

Office use only

Ref:

Date Received:

My comment relates to a specific (tick one only):

Site Allocation

Policy

Paragraph

The site reference / policy number / paragraph / page number is:

Comments:

Information or Evidence which supports your views:

If you wish to make further comments on separate sites, policies or paragraphs please complete and attach additional comments form boxes pages as required to your contact details page.

Please use a separate box for each site, policy or paragraph you wish to comment on and continue on a separate sheet if necessary.

Appendix 6

Preferred Option 2013 Consultation Responses

Fylde Local Plan to 2030: Part 1 - Preferred Options consultation

RESPONSES REPORT

Consultation Statement:

- 1. Section A: Summary of Consultation**
- 2. Section B: Summary of comments received and the Council response**

July 2014

Consultation Statement - Section B: Summary of comments received and the Council response

This report is structured in parallel to the chapters in the Fylde Local Plan to 2030: Part 1 - Preferred Options consultation document.

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Chapter 1: Introduction

Chapter 1: Introduction

Number of representations:

Comment	Support	Object	Total
17	1	12	30 ¹

Representations received from:

- Environment Agency
- English Heritage
- Home Builders Federation
- Campaign to Protect Rural England (CPRE) – Fylde District
- BAE Systems Real Estate Solutions
- Ribby with Wrea Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Lancashire County Council
- AXA Insurance
- 7 Residents
- Residents of Mythop Road
- 3 Residential Developers

What you said

AXA Insurance suggested that the Local Plan should be seen as an opportunity to bring sustainable development which can support those living and working in Fylde.

BAE Systems Real Estate Solutions agreed with the majority of the principles listed in paragraph 1.2, but that the paragraph should be more explicit about the delivery of the principles. They suggested the following amended wording:

- Delivering sustainable development;
- Stimulating economic and housing growth and its associated infrastructure;
- Spatial planning and ensuring a deliverable supply of land to ensure the growth above;
- Addressing climate change through design and energy management;
- Creating high quality developments through inclusive and accessible design principles;
- Involving the community through innovative engagement techniques and the neighbourhood planning process.

¹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

Cllr Eastham said that paragraphs 1.4 and 1.20 should clearly explain the infrastructure that will be required to deliver the Vision. The Cllr also commented that paragraph 1.8 should more clearly define what changes will be reflected by the Policies Map.

A residential developer claimed that the Council needs to fully satisfy the requirements of the Duty to Co-operate and to publicise what steps have been taken to achieve this.

In relation to the production of the Local Plan, some residents considered that there has been little public consultation across the Fylde before the Local Plan was published. The residents also claimed that a substantial number of the Full Council refused to endorse the Plan; that the MP for Fylde regards the numbers used by the Council to be too high; that the Portfolio Holder has said that Warton does not need the number of new homes put forward in the Plan; that 8 weeks for the consultation is inadequate; that the Council will not take account of the comments made during consultation; that the Council will not make any changes even when the assumptions to support the Local Plan alter; and that the previous consultation was inadequately advertised.

A resident suggested that the Introduction, along with the rest of the document, contains much that is misleading or untrue. The resident added that paragraph 1.16 suggests that the Preferred Options takes account of the earlier Issues and Options consultation. However, the resident claimed that both the 'Issues and Options' and 'Preferred Options' consultations were both ineffective and the Preferred Options document has not taken account of previous consultation responses.

The Minority Group Report commented that none of the options put forward at the Issues and Options stage have been taken forward, option 5 was the most popular option but this has not been taken forward.

In relation to the 'Issues and Options' section, some residents said that Warton is identified as a strategic location in the Local Plan – 'Preferred Options', but not in the previous 'Issues and Options' stage. The residents also claimed that the results of the Issues and Options consultation are heavily influenced by large scale commercial organisations who would gain from the provision of so much housing within Warton.

With regard to paragraph 1.18, English Heritage considered that the published evidence base available on the Council's website lacks sufficient evidence that relates to the historic environment, such as Conservation Area Appraisals.

A residential developer suggested that other key parts of the evidence base are absent, particularly in relation to a proper objective assessment of the need for housing; and an assessment of economic viability of the cumulative impact of planning policies on viability and deliverability. They added that the production of key elements of the evidence base later in the process is undesirable and may require fundamental changes to the Plan.

The Environment Agency recommended including the Level 1 Strategic Flood Risk Assessment in the list of technical assessments undertaken to accompany the Local Plan. The Home Builders Federation said that the Council should have regard to the 2012 Local Housing Delivery Group guidance on 'Viability Testing of Local Plans.' They also said that they encourage the Council to involve members of the local development industry, adding that these will often be able to provide realistic views of the local market and development costs.

Lancashire County Council welcomed reference to the Lancashire Minerals and Waste Local Plan. They added that the final version of the Local Plan should clearly make reference to Mineral Safeguarding Areas and the requirements of policy M2 of the Lancashire Minerals

and Waste Local Plan against relevant allocations. One response stated that part of site M2 of the Fylde Local Plan – Preferred Options (Whyndyke Farm) is peat.

The Environment Agency claimed that they support reference to shale gas activities in the district. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors said that whilst shale gas exploration and extraction ('fracking') is the responsibility of Lancashire County Council (in its role as the Mineral Planning Authority), the implications for Fylde could be huge. He therefore considered that more needs to be said about this topic in the Local Plan. Several other respondents also claimed that there was very little mention of shale gas exploration and extraction ('fracking'), and a respondent said that there is no mention about the effects on Fylde's future. Ribby with Wrea Parish Council claimed that shale gas exploration and extraction should be given more priority in the Local Plan. CPRE – Fylde District added that shale gas exploration and extraction will necessitate significant strategic infrastructure, most of which fall within the scope of Fylde as the local planning authority. CPRE – Fylde District also considered that there should be strong policies in the Local Plan to protect existing settlements and the open countryside, whilst gaining from employment and infrastructure. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors made reference to potential impacts on bathing water quality. A respondent claimed that the health impacts of shale gas exploration and extraction should be considered in the Local Plan.

Council response

The Council agrees that the Local Plan is an opportunity to bring sustainable development which can support those living and working in Fylde.

The Council agrees to amend and expand the Local Plan principles listed in paragraph 1.2 to read:

- Delivering sustainable development;
- Stimulating economic and housing growth and its associated infrastructure;
- Addressing climate change;
- Creating high quality developments;
- Good accessibility;
- Community involvement and engagement.

The forthcoming viability assessment of the Local Plan – Preferred Options document has taken account of the 2012 Local Housing Delivery Group guidance on 'Viability Testing of Local Plans.'

Where appropriate, the Council will consider involving members of the local development industry when preparing evidence to support the Local Plan.

The Council does not agree that the Introduction should explain the infrastructure that will be required to deliver the Vision. Evidence gathered so far has been summarised in the supporting draft Infrastructure Delivery Plan and chapters 7 and 12 of the Local Plan – Preferred Options document.

The Council will continue to satisfy the requirements of the Duty to Co-operate and will publicise the steps that have been taken to achieve this in the Authority Monitoring Report (AMR).

The Council will prepare a Policies Map, which will accompany the Publication version of the Local Plan. The Council is in the process of identifying the significant changes and allocations that should be identified on the Policies Map.

In terms of the production of the Local Plan, there has been extensive consultation on the Local Plan during its preparation. Details of the consultation methods used by the Council for the Preferred Options consultation can be found at the start of this report. Details of the methods used for previous consultations can be found on the Council's website via the following link: <http://www.fylde.gov.uk/council/planning-policy--local-plan-/local-development-framework/local-plan-to-2030-consultations/> . The Council's housing figure will be supported by a robust evidence base, principally the findings of the Fylde Coast Strategic Housing Market Assessment (SHMA), which was published in June 2014.

The minimum period for statutory consultations on the Local Plan is six weeks. The Council considers eight weeks for consultation to be adequate. The Preferred Options consultation was an informal consultation as part of 'continuous engagement' rather than a statutory consultation.

The Council has considered all comments received during the consultation exercise and will make amendments to the Local Plan as appropriate. This included comments from a range of individuals, groups and organisations. However, the Council also needs to consider the evidence base that supports the Local Plan, along with government policies and other strategies and guidance. All these aspects need to be considered as the Council develops the Local Plan.

The Local Plan – Issues and Options document set out five spatial options for the distribution of future development. It is correct that none of these options identified the proportion of development at Warton as set out in the 'Preferred Options'. However, at the Issues and Options stage the Council asked for views as to whether there are any further options for development in the Borough. In addition, some respondents claimed that when considering options for the location of development, the Enterprise Zone at BAE Systems, Warton should be considered, along with linkages and accessibility to Preston. This includes the implications for wider connectivity in Fylde, consideration of strategic development in North West Preston, together with the key transport infrastructure improvements that will be required to enable this to take place.

In considering the Preferred Options, the Council has taken feedback on the alternative options and the findings of the Interim Sustainability Appraisal. Taking these and further discussions with infrastructure providers on board, the Council concluded that none of the five alternative options individually provided a preferred option for the future development in Fylde. Therefore, the Council proposed the spatial development framework set out in the Local Plan – Preferred Options document.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

In terms of other evidence, the Viability Assessment of the Local Plan – Preferred Options document is summarised in the appendices of this consultation statement. The Fylde Coast Strategic Housing Market Assessment (SHMA) was published in June 2014 and contains the most realistic population projections for the Borough, which will be used in the next version of the Local Plan (Part 1).

The list of technical assessments in paragraph 1.19 are assessments of the Local Plan – Preferred Options document. Therefore, the Council did not consider it appropriate to include the Level 1 Strategic Flood Risk Assessment in this list.

In its draft form, policy M2 of the Lancashire Minerals and Waste Site Allocations and Development Management Development Plan Document identified peat as one of a number of safeguarded minerals, and areas of peat were included in the draft Minerals Safeguarding Area maps. However, during the Examination in Public, the Inspector questioned whether peat was a mineral in light of the publication of the National Planning Policy Framework (NPPF). Following the publication of the Inspector’s report into the Minerals and Waste Local Plan, peat has been removed from the adopted policy and the maps. Consequently, the Minerals and Waste Local Plan no longer refers to peat deposits and peat is no longer safeguarded as a mineral. As a result, the Fylde Local Plan – Part 1 does not need to refer to the requirements of policy M2 in terms of safeguarding peat deposits.

The Council considers that there is no need for more emphasis to be placed on shale gas exploration and extraction (‘fracking’) in the Local Plan, as this is dealt with by Lancashire County Council, as the Mineral Planning Authority. Any infrastructure requirements for shale gas exploration and extraction will be included in planning applications submitted to the County Council. Fylde Borough Council will be consulted by the County Council on planning applications for shale gas exploration and extraction. The Council agrees to make reference to the emerging shale gas exploration and extraction supplementary planning document in chapter 1. The Local Plan Part 1 has not planned for shale gas, as it is too early to factor in, it is not known if it is economically viable. If it takes off economically, the Council will undertake a further review.

Recommendations for change

- Amend paragraph 1.2 of the Preferred Options to read:
“Delivering sustainable development;
Stimulating economic and housing growth and its associated infrastructure;
Addressing climate change;
Creating high quality developments;
Good accessibility;
Community involvement and engagement”.
- Insert a new paragraph after paragraph 1.4 of the Preferred Options to read: “The Fylde Local Plan Part 1 which runs from 1st April 2011 to 31st March 2030, needs to be read as a whole and every policy and justification should be considered alongside all of the other policies and balance needs to be made when considering planning applications”.
- Amend text in paragraph 1.5 of the Preferred Options to read “... the Fylde Coast sub-region ...”
- Prepare a Policies Map, which will accompany the Publication version of the Local Plan (Part 1).

- Amend paragraph 1.24 of the Preferred Options to read: “Mineral Safeguarding Areas are included within the adopted Lancashire Minerals and Waste Local Plan” and delete the remaining text in the paragraph as it is now no longer required.
- Amend paragraph 1.25 of the Preferred Options by deleting criterion g): “In the case of peat deposits, that it no longer serves as a carbon sink”.
- Amend paragraph 1.27 of the Preferred Options by deleting the second sentence: “With regard to the peat deposits, site surveys should consider the extent, depth and condition of the reserves and what contribution or potential contribution they could make in terms of carbon sink”.
- Amend paragraph 1.28 of the Preferred Options by deleting the words “Peat and” from the text. The sentence should read: “The following map shows where Mineral Safeguarding Areas are identified within Fylde”.
- Amend paragraph 1.30 of the Preferred Options to include a reference to the shale gas exploration and extraction supplementary planning document, which is being prepared by Lancashire County Council in its role as the Mineral Planning Authority.
- Insert an updated copy of the Mineral Safeguarding Areas map on page 13 of the Preferred Options, precluding ‘Peat Safeguarding Areas’. Add “Figure 1” to the title of “Mineral Safeguarding Areas” map on page 13.

Chapter 2: Spatial Portrait of Fylde

Chapter 2: Spatial Portrait of Fylde

Number of representations:			
Comment	Support	Object	Total
23	3	30	56 ²

Representations received from:

- English Heritage
- Lancashire Wildlife Trust
- United Utilities
- National Farmers Union
- BAE Systems Real Estate Solutions
- Councillor Eastham
- Blackpool Council
- Treales, Roseacre and Wharles Parish Council
- Lytham St Annes Civic Society
- 17 residents

What you said

Fylde Borough

Population growth

Cllr Eastham suggested that the estimated population growth in Fylde of “15.3%” between 2010 and 2035 should be checked for accuracy.

Heritage

English Heritage claimed that the overall spatial portrait makes no reference to the built heritage of the Borough. They also considered that the chapter would benefit from a proper, accurate assessment of the significance of the heritage assets in the area and the contribution they make to the Borough. They suggested that more needs to be said about heritage assets for each strategic location in this chapter.

English Heritage considered that this chapter should include maps. They said that a map should be included under each of the four sections of the chapter that relate to the four strategic locations and also under the ‘Rural Area’ section. English Heritage claimed that each map should show the location of the area and its key characteristics, including the historic environment. They also believed that there should be a map that shows all conservation areas and heritage assets in the Borough and that the Plan would also benefit from a map that identifies heritage assets.

Flood Risk

² Some respondents submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

The chapter highlights that development will not take place in high flood risk areas. However, some residents claimed that there are areas North of Dowbridge, Kirkham that are at risk of flooding. Another resident said that Hillock Lane at Warton is located within a high flood risk area, and that the road has had to be closed on numerous occasions due to flooding. The resident added that if the fields are built over, this will almost certainly increase the amount of surface water run-off and make the flooding significantly worse.

Lytham and St Annes

Seafronts

Lytham St Annes Civic Society supported the development of the Ribble Coast and Wetland Regional Park. However, they said that there should be reference to Lytham Green. They agreed that Lytham and St Annes town centres should be supported, but they added that the differences between Lytham and St Annes seafronts are not mentioned. They considered that there should be a policy that keeps Lytham's seafront distinct to that of St Annes; that tourism related outlets should be kept away from the Green; and that commercial events on the Green should be restricted in order to keep it as an important open space for the amenity of residents and tourists. They also said that parking should only be allowed when supporting these events.

Surface water

United Utilities suggested that paragraph 2.19 should specify that a number of watercourses in the area discharge to the combined sewage system. They added that this would help explain the issues with the system and that surface water is fully considered before a planning application is submitted. In relation to paragraph 2.24, they suggested that the statement reference to "increased capacity of the combined sewer system" should be deleted as there are other factors that will have driven the phasing.

Ballam Road / Peel Road

The Lytham St Annes Civic Society observed that the constraints map omits the Ballam Road / Peel Road route to the M55. They said that this route is used by the majority of residents in Lytham, and is very poor. They claimed that the alternative route through Wrea Green is also poor. They added that the site for Cuadrilla's exploratory drilling is directly off Peel Road and that Ballam Road / Peel Road will be the route for tanker loads of water to be transported to Davyhulme. The Civic Society considered that the roads are unsuitable for this purpose.

Deprivation

Cllr Eastham questioned the accuracy of the statement in paragraph 2.11 that Fairhaven ward has been in the bottom third of the poorest wards in the country.

Kirkham and Wesham

Conservation Area

Paragraph 2.29 says that "the appearance of [Kirkham] town centre has deteriorated recently and requires investment." English Heritage claimed that this suggests that the historic core is of poor quality. However, they said that the Conservation Area does not appear to be on the Conservation Area at Risk Register. English Heritage also said that reference is made in paragraph 2.29 to the protection of unfound archaeological remains at Kirkham and Wesham. They claim that evidence is needed to support this statement.

Retail offer

Cllr Eastham said that the sentence in paragraph 2.29: “The retail offer in Kirkham town centre is limited” should be reworded, as he suggested that the word “limited” gives the wrong impression of the centre’s offer.

Ribby Hall Village

For paragraph 2.30, Cllr Eastham considered that the part of the sentence that says that Ribby Hall Village “may have the potential for expansion” should be deleted as it is questionable whether that potential actually exists.

Freckleton and Warton

Warton – BAE Systems / Enterprise Zone

A resident claimed that the Lancashire Enterprise Zone (Warton) will not create net additional jobs at Warton, as it is extremely unlikely that the Warton site will attract sufficient business to compensate for the BAE Systems staff reductions. The resident also considered that there is no shortage of housing in Warton for BAE Systems employees. The resident claimed that historically most employees at BAE Systems did not want to live close to where they worked, and there were and continue to be homes for sale in Warton for long periods. The resident added that the long term prospects for BAE Systems are not good, and that the Enterprise Zone will at best enable people from BAE Systems to continue to work in Warton, but that in reality the number of jobs in Warton is likely to decrease.

A resident claimed that the assumption that the restructure of BAE Systems, Warton and the establishment of the Enterprise Zone will create “net additional employment opportunities” is wrong. The resident suggested that there is continuing worldwide reductions in defence spending, and that the restructuring at BAE Systems, Warton means redundancies rather than merely moving staff around. Because of this, the resident suggested that the housing requirement in Warton should be reduced to a sustainable figure.

BAE Systems Real Estate Solutions did not agree with the terminology in paragraph 2.33 that the area is constrained by existing employment land at BAE Systems, Warton. They considered that the Plan should provide positive statements in relation to the opportunities that existing land areas can provide through continued employment and jobs. BAE Systems Real Estate Solutions also recommended that that it would be useful if support was given in the document to the inclusion of the northern part of the Warton Aerodrome within the settlement boundary of Warton. They considered that the density, scale, form and amount of development within this area is urban in character.

BAE Systems Real Estate Solutions considered that it would be useful to provide information on the Lancashire Enterprise Zone and the Local Development Orders (LDOs) in the Plan, including their purpose and how they operate. They agreed with paragraph 2.38, but were not convinced that the Local Plan provides an explicit statement on a flexible framework for the Warton Aerodrome and Enterprise Zone sites. They also suggested that the Local Plan should ensure that there is protection and safeguarding for operations related to the airfield at Warton Aerodrome.

Warton – Secondary school

A resident questioned the need for a new secondary school as Census data shows a sharp decrease in 0-19 year olds in the Borough. The resident added that Warton is a curious location for a new secondary school if the need is in St Annes. In relation to the reference in the paragraph to the provision of land for recreational opportunities, the respondent claimed that there are already recreational opportunities at Warton.

A resident considered that the siting of a secondary school at Warton would create a major traffic problem during rush hour times.

Warton – Centre

In relation to paragraph 2.39, a respondent considered that Warton already has a recognised centre. BAE Systems Real Estate Solutions suggested that the need for retail provision at Warton has not been satisfied. They claimed that there may be an opportunity at Warton Aerodrome, to provide a site or sites at an accessible location for a District Centre in Warton.

Warton – Other issues

Treales, Roseacre and Wharles Parish Council questioned the impact of Warton development on shopping and schools at Kirkham and Wesham, and asked what assessment had been carried out.

For paragraph 2.34, Cllr Eastham recommended that the last sentence, which refers to Freckleton and Warton as being the “most affordable in the borough” should be reworded to “one of the most affordable”.

In relation to paragraph 2.36, a resident claimed that there is no shortage of allotments in Warton.

Freckleton – Green Belt

Paragraph 2.39 claims that without a review of the Green Belt, development at Freckleton will be limited to infill. Some residents suggested that there is a need to review the Green Belt at Freckleton because it is preventing Freckleton from playing its proper role as a Local Service Centre. They also claimed that Freckleton has operated as a significant settlement for several hundred years; that it has direct transport links to Kirkham; that the Green Belt at Freckleton is preventing the natural development of Freckleton; and that the Green Belt is threatening the continued viability of the substantial retail and other service offering to the region at large. The residents also added that substantial proportionate housing development on the current Green Belt would invigorate the current service offering.

Residents claimed that at the Examination in Public stage of the earlier Joint Lancashire Structure Plan (JLSP), a proposal to designate Warton as a Local Service Centre was comprehensively discussed and rejected by the JLSP authority on the grounds that people from surrounding villages did not travel to Warton to access services (since that time the facilities in Warton have been reduced).

The residents suggested that there is a need to provide more local support to Freckleton’s retail services so that they can continue to provide services to the local region. The residents suggested that it is crucial that the Plan supports the maintenance of healthy retail centres and other services, and that this requires concentration on the development of these centres rather than introducing scattered competitive services around the Borough.

A resident added that the Preferred Options document has already amended Green Belt policy by the addition of an Area of Separation between Wrea Green and Kirkham, and that it is clear from the definition that this is Green Belt.

Fylde-Blackpool Periphery

Blackpool Council questioned why the Fylde-Blackpool Periphery area includes Normoss and Westby-with-Plumpton parish, as no strategic development is proposed here and they are not included in the Key Issues / Implications for the Local Plan section. In relation to the sub regional significance of the Whitehills area, Blackpool Council suggested that they would prefer reference being made to “Land at Junction 4 of the M55” to reflect the opportunities in this area and to be consistent with the Memorandum of Understanding. They also suggested that reference to Whitehills’ sub regional importance beyond the plan period in paragraph 2.48 is confusing.

Surface water

United Utilities suggested alternative wording for paragraph 2.46 regarding surface water management to read: “There are surface water issues in the vicinity of junction 4 of the M55, which mean that development in this area will need to carefully consider the approach to surface water management. The most sustainable form of managing the surface water from the site will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be to greenfield run-off rate. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. Subject to the detail of the drainage proposals, it may be necessary to co-ordinate the delivery of the development with the delivery of infrastructure.”

Dunes

Lancashire Wildlife Trust said that the DEFRA funding referred to in paragraph 2.45 only covers the period 2013-2017, after which further funding will be required to manage the dunes to maintain their flood defence function.

Rural area

Agriculture

The National Farmers Union was pleased that the importance of agriculture within the region had been acknowledged in paragraph 2.52; that there is an understanding that there is a need for diversification as part of a prosperous rural economy in paragraph 2.54; and that paragraph 2.57 portrays a positive future for the farming and rural community.

Static caravans

For paragraph 2.53, Cllr Eastham suggested that the last sentence that says “The unauthorised use of static holiday caravans for residential use puts pressure on local facilities” should be deleted if a policy is not included relating to this issue. Treales, Roseacre and Wharles Parish recommended that there is a need for the Local Plan to consider occupancy of static caravans, along with the extra demand on services if all static caravans were occupied. They suggested that it would make sense to provide services for static home users.

Other issues

Treales, Roseacre and Wharles Parish Council questioned why there is no reference to Roseacre as part of the rural area.

Lancashire Wildlife Trust suggested that paragraph 2.56, in relation to shale gas exploration, needs to mention impacts on biodiversity.

Council response

Fylde Borough

Population growth

The Fylde Coast Strategic Housing Market Assessment (SHMA), which was published in June 2014, contains the most realistic population projections for the Borough that will be used in the next version of the Local Plan (Part 1).

Heritage

The Council agrees that reference needs to be made to the heritage of the Borough, including some of its key heritage assets, within the 'Fylde Borough' section and for each of the settlement areas under the 'Local Areas' section.

The Council will refer to the Local Areas and Key Constraints map within the text and that Fylde–Blackpool Periphery will be identified on the map.

The Council does not consider that the maps should show the key characteristics of the locations. However, the Council agrees to identify all 10 conservation areas and the 3 registered Historic Parks and Gardens on the Policies Map.

Comments in relation to heritage characteristics and assets are dealt with in policy ENV5 and in the supporting text in chapter 14. Policy ENV5 is to be completely re-drafted, taking on board the comments made by English Heritage.

The Council will include reference to registered Historic Parks and Gardens in paragraph 2.16 of the Preferred Options document.

Flood Risk

Areas within Flood Risk Zone 3 are considered to be at the "highest" risk of flooding. Part of site H7 on land north of Dowbridge, Kirkham is in Flood Risk Zone 2. Government policy allows housing development in Flood Risk Zone 2 only if the 'Sequential Test' has been met, which shows that there are no appropriate alternative sites that are not within Flood Risk Zone 2.

Part of site H10 (Land east of Warton) is within Flood Risk Zones 2 and 3. For sites that overlap into Flood Risk Zone 3, Government policy allows housing development if the 'Sequential' and 'Exceptions' test has been met.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of development, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the Policies Map. For strategic location sites with approved permissions, the number of dwellings specified in the application has been used as the site's capacity.

The main flood risk issue at Warton is surface water flooding. This is mainly due to the drainage of the surrounding land. In terms of development taking place on this land, the Environment Agency have advised the Council there are normally engineering solutions to such issues and that such issues can normally be overcome through appropriate Sustainable Drainage Systems (SuDS), and such a system would be agreed at the planning application stage.

Lytham and St Annes

Seafronts

The Council agrees that reference should be made in this section to the distinct identity of Lytham seafront, and that of St Annes seafront. However, the Council does not agree that there should be a policy on the seafronts at Lytham and at St Annes. Policy ENV2 of the Preferred Options document protects open spaces, and this includes Lytham Green. Policy CL1 requires developer contributions through the Community Infrastructure Levy for the

repair or replacement of the coastal flood defences, and this would include substantial works at the defences at Pleasure Island, Fairhaven Lake and Church Scar. Therefore, there is expected to be substantial improvements to the promenade in these locations. The Council recognises the key role and significance that Lytham Green plays within the wider townscape and the importance of protecting this feature from inappropriate development.

Surface Water

The Council will amend paragraphs 2.19 and 2.24 as suggested by United Utilities.

Ballam Road / Peel Road

The purpose of the map is to identify 'key' constraints. It would not be feasible to include infrastructure constraints, including highway capacity, school capacity, sewer capacity on the map as such issues are extensive across the Borough. Infrastructure issues will be identified in the Infrastructure Delivery Plan, which will support the Local Plan. In response to comments regarding infrastructure impacts of shale gas exploration and extraction ('fracking'), the Local Plan Part 1 has not planned for shale gas, as it is too early to factor in, it is not known if it is economically viable. If it takes off economically, the Council will undertake a further review.

Deprivation

Paragraph 2.11 contains an error. The opening sentence should read: "There are a few pockets of significant deprivation, particularly in parts of the St Annes wards of Central, Ashton, Fairhaven and Kilnhouse, which are recorded as being in the bottom third poorest LSOAs³ nationally."

Kirkham and Wesham

Conservation Area

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The evidence to support the reference in paragraph 2.30, to the protection of unfound archaeological remains at Kirkham and Wesham, can be found in the Lancashire Historic Towns Survey. Reference to this will be provided in the next version of the Local Plan (Part 1) to support the statement.

Retail offer

The Council will refer to Kirkham's position in the retail hierarchy and amend reference to "limited" and delete the reference to "increasing vacancy rates and a growing number of charity shops".

Ribby Hall Village

The Council will clarify the role of Ribby Hall Village, i.e. there will be no expansion beyond the existing boundary of the site.

Freckleton and Warton

Warton – BAE Systems / Enterprise Zone

³ Lower Super Output Areas

There has been significant investment at BAE Systems at Warton in the last five years, including runway resurfacing, new offices and hangers. BAE Systems, Warton are receiving new orders (including Typhoon and Hawk) which will enable consolidation on the site, after some initial shrinkage which was required to ensure the company remained competitive.

The aim of the Enterprise Zone at BAE Systems Warton is to attract a range of advanced engineering and manufacturing businesses. BAE Systems Real Estate Solutions have claimed that they anticipate the creation of 3,000 jobs at the Enterprise Zone over the next 20 years. The siting of the Enterprise Zone at BAE Systems, Warton provides an added impetus to the implementation of new infrastructure, particularly the construction of the Preston Western Distributor road, identified in the Central Lancashire Highways and Transport Masterplan, which will provide easier access to the Enterprise Zone from the strategic road network.

Paragraph 2.33 will be amended to delete “constrained” and replace with “defined”.

The Council does not agree that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary. However, the boundary of the Enterprise Zone will be identified on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

The Council considers that the level of reference to the Enterprise Zone in chapter 2 is sufficient. Chapter 9 contains a section that provides further information on the Lancashire Enterprise Zone at BAE Systems, Warton.

In relation to the protection and safeguarding of Warton Aerodrome, paragraph 9.23 says: “Existing employment sites included in the adopted FBLP (including land at BAE Systems, Warton), will continue to be protected until the Fylde Local Plan 2: Site Allocations to 2030 is produced. Therefore, the future of the Enterprise Zone will be assessed after its initial three years, as part of the Local Plan Part 2.”

Warton – Centre

The Council acknowledges that there is a small cluster of amenities in the centre of the settlement. However, the Council considers that a more substantial and clearly defined centre is required to support existing residents, and also to serve the prospective residents of the proposed strategic housing allocations at the settlement. The Council will consider allocating a ‘Village Centre’ at Warton as part of the Local Plan Part 2 preparation process. The Council is aware of a strip of land adjacent to Lytham Road, in BAE Systems ownership, which could be included as part of an allocated ‘Village Centre’ in the Local Plan.

Warton – School

The process of establishing a location for a secondary school is still at an early stage. It is anticipated that a definitive decision as to whether a new secondary school will be required, along with its location within the catchment area identified by Lancashire County Council will be made before the Council issues the next version of the Local Plan (Part 1).

Potential sites for a secondary school within Lytham and St Annes were considered by Lancashire County Council, but such sites were either too small, had planning permission for other uses, or were on sites where development is close to going ahead or being approved.

Land west of Warton was suggested as a preferred location by Fylde Council as it is anticipated that the school could also serve the demand associated with the strategic housing sites proposed at Warton in the Preferred Options. It is also less likely to compete with existing secondary schools and will serve the population in east Fylde.

United Utilities have advised that development could be phased earlier in the Plan period at Warton, as there are serious capacity issues with the combined sewer network at Lytham St Annes.

Warton – Other Issues

The Council agrees that the last sentence of paragraph 2.34 which refers to Freckleton and Warton as being the “most affordable in the borough”, should be reworded to “This area is one of the most affordable in the Borough, but additional affordable housing is required”.

The Council agrees to delete paragraph 2.36 regarding allotments.

The Council considers it necessary to cross refer to paragraph 7.49 in chapter 7 of the Preferred Options document: “it is anticipated that development at Warton will provide for increased shops, improved local facilities, and better access to the centre and that this will assist in providing Warton with an improved local centre, and enhanced sustainability as set out in the Vision.”

Freckleton – Green Belt

Paragraph 8.7 of the Preferred Options document says that “no strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan.” The NPPF clarifies that “Green Belt boundaries should only be altered in exceptional circumstances.” The Council does not believe that there are “exceptional circumstances” to review the Green Belt, including the points raised by respondents during the Preferred Options consultation exercise.

Fylde-Blackpool Periphery

Members Decision

The Members resolved at the Local Plan Steering Group meeting on 8th May 2014 to rename the area of land labelled as the “Blackpool Periphery” in the Preferred Options document to: the “Fylde-Blackpool Periphery”.

The Council agrees that ‘Normoss’ should be deleted from paragraph 2.41, as no strategic development is proposed in this location. The Council will amend the reference to Westby-with-Plumpton to refer to the North West area of the parish.

The Council will amend paragraph 2.48 to remove “beyond the plan period”.

Surface water

The Council will amend paragraph 2.46 as suggested by United Utilities.

Dunes

The Council will make reference in the text to the need for further funding that will be required for dune management beyond 2017.

Rural Area

Agriculture

The Council acknowledges the positive comments from the National Farmers Union for paragraphs 2.52, 2.54 and 2.57.

Static caravans

Members Decision

The Members have resolved not to draft a policy which regulates the unauthorised use

The Council agrees in paragraph 2.53 to cross refer to policy EC6 and its reasoned justification, which resists the loss of caravan pitches.

Other issues

In response to Treales, Roseacre and Wharles Parish Council's question why there is no reference to Roseacre as part of the rural area; the Issues and Options paper included an appendix (Appendix 1) which looked at settlement hierarchy, population and accessibility score. The Council will, however, consider refining the settlement hierarchy for settlements outside the strategic locations as it develops the next version of the Local Plan based upon the settlement sustainability.

The Council agrees that paragraph 2.56 should mention the impacts of shale gas exploration and extraction on biodiversity.

Recommendations for change

- Amend the 'Fylde Borough' section at the start of chapter 2 to make reference to the heritage of the Borough, including some of its key heritage assets and for each of the settlement areas under the 'Local Areas' section, making an assessment of their contribution to the area. Cross refer to the Heritage Assets, which are set out in more detail in policy ENV5 and in the supporting text in chapter 14.
- Add "Figure 2" to the title of the "Fylde in Context" map on page 14 of the Preferred Options.

- Refer to Local Areas and Key Constraints map from page 22 within paragraph 2.7 of the Preferred Options.
- Include the new name of “Fylde-Blackpool Periphery” throughout the document.
- Add “Figure 3” to the title of the “Local Areas and Key Constraints” map on page 22 of the Preferred Options.
- Amend the first sentence in Paragraph 2.11 of the Preferred Options to read: “There are a few pockets of significant deprivation, particularly in parts of the St Annes wards of Central, Ashton, Fairhaven and Kilnhouse, which are recorded as being in the bottom third poorest LSOAs⁴ nationally.”
- Refer to a settlement’s position in the settlement hierarchy, i.e. Lytham and St Annes (amend paragraph 2.12 of the Preferred Options document) and Kirkham (amend paragraph 2.29 of the Preferred Options) are key service centres.
- Amend paragraph 2.16 of the Preferred Options to read: “There is a high concentration of listed buildings and conservation areas, with Lytham Hall a Grade I listed building on the ‘property at risk’ register. There are 3 registered Historic Parks and Gardens of national importance: Ashton Gardens and Promenade Gardens in St Annes and Lytham Hall Park in Lytham. All of the conservation areas and the 3 registered Historic Parks and Gardens are identified on the Policies Map”.
- Add the following paragraph before the ‘Local Area’ section in Chapter 2: “Fylde contains a number of heritage features, referred to as ‘heritage assets’, including 197 Listed Buildings (of which one is Grade I, five are Grade II* and 191 are Grade II), 10 Conservation Areas, 3 Registered Parks and Gardens (included within the national register: i.e. Lytham Hall Park, Ashton Gardens and Promenade Gardens, all within Lytham and St Annes) and 1 Building at Risk. There are no scheduled ancient monuments, but there is the potential for undesignated archaeological sites. In addition, there are heritage assets of local interest that may not meet the criteria for statutory designation but merit protection. The heritage assets are set out in more detail in policy ENV5 and in the supporting text in Chapter 14”.
- Add the following text after the first sentence in paragraph 2.19 of the Preferred Options document: “A number of watercourses in the area discharge to the combined sewage system”.
- In paragraph 2.24 of the Preferred Options, delete: “such as increased capacity of the combined sewer system”.
- Amend the second sentence in paragraph 2.29 of the Preferred Options to read: “Kirkham like Lytham and St Annes serves the role of a key service centre, but has less retail offer. Delete the following wording: “Kirkham has increasing vacancy rates and a growing number of charity shops”.
- Amend paragraph 2.30 of the Preferred Options, which refers to Ribby Hall Village to read: “...where there may be the potential for future investment and enhancement”.

- Paragraph 2.33 of the Preferred Options, delete “constrained” in the second sentence and replace with “defined”.
- Amend the last sentence of paragraph 2.34 of the Preferred Options which refers to Freckleton and Warton to read: “This area is one of the most affordable in the Borough ...”
- Delete paragraph 2.36 of the Preferred Options, which referred to a shortage of allotments.
- Amend the section on Seafronts to make reference to the distinct identity of Lytham seafront, and that of St Annes seafront. Draft the wording on the distinct identity of Lytham seafront and St Annes seafront.
- Delete ‘Normoss’ from paragraph 2.41 of the Preferred Options. Amend Paragraph 2.41 of the Preferred Options to refer to “...North West Westby-with-Plumpton”.
- Add the following sentence to the end of paragraph 2.45 of the Preferred Options: “In addition to the existing funding from DEFRA for dune management, which only runs from 2013 to 2017, there is a need for further funding to manage the dunes to maintain their flood defence function”.
- Amend paragraph 2.46 of the Preferred Options document to read: “There are surface water issues in the vicinity of junction 4 of the M55, which mean that development in this area will need to carefully consider the approach to surface water management. The most sustainable form of managing the surface water from the site will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be to greenfield run-off rate. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. Subject to the detail of the drainage proposals, it may be necessary to co-ordinate the delivery of the development with the delivery of infrastructure.”
- Delete “beyond the plan period” from the second sentence of paragraph 2.48 of the Preferred Options document.
- Amend paragraph 2.53 of the Preferred Options document by adding a new sentence cross referencing to policy EC6 and the reasoned justification, which resists the loss of caravan pitches.

Amend paragraph 2.56 of the Preferred Options document to read: “The potential for shale gas exploration and extraction in the Fylde area could provide benefits to the local economy, but could also have impacts on rural tourism, farming, biodiversity and quality of life.”

Chapter 3: A Vision for Fylde

Chapter 3: A Vision for Fylde

Number of representations:			
Comment	Support	Object	Total
5	0	4	9 ⁵

Representations received from:

- Councillor Eastham
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- BAE Systems Real Estate Solutions
- Kirkham Grammar School
- 3 Residents

What you said

A resident suggested that as the Local Plan Vision makes reference to the merits of “attractive villages” separated by “pleasant landscapes”, fewer houses will need to be built, resulting in fewer greenfield areas being lost. The resident claimed that the Plan should concentrate new housing near to services, e.g. Whyndyke Farm, rather than in rural areas where many needs cannot be met.

A resident suggested that the Vision is superficial, unconvincing, and does not recognise the Borough’s pressures, problems, opportunities and choices to be made. The resident claimed that the Vision does not address the issue of migration; and that the ongoing development of Warton for cheap housing is disguised by declaring it to be development arising from the Enterprise Zone and the assertion that new housing will improve services. The resident claimed that Warton will not get a GP Surgery or a Pharmacy, as is set out later in the document, as there are substantial services nearby. In terms of a swimming pool, the resident questioned how Warton can sustain a swimming pool when the Borough cannot sustain two swimming pools in its population centres.

A resident suggested that the general state of confusion in the Vision is captured most succinctly in the fifth paragraph which seems to suggest that climate change risk will be ameliorated by low carbon energy generation in the Borough. The resident recommended that a much better Vision statement could read: Recognise the level of environmental stress on the Borough; refrain from house building on green fields which will make surface drainage a bigger issue; do not rely on pumped Sustainable Drainage Systems, as they fail under extreme conditions; and address the issue of drainage and flood defence more seriously.

A resident suggested that the new Enterprise Zone was set up by the government to mitigate the redundancies from BAE Systems, Warton not to attract new people to the Fylde. Therefore, the resident recommended that there is no need to develop at Warton. With regard to the statement “All development will have respected and conserved the individual

⁵ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

character of the villages”, the resident claimed that the Plan does not respect or conserve the character of Warton. The resident suggested that the scale of development proposed at Warton is against the wishes of the residents, as expressed in the Parish Plan. The resident claimed that Warton is a village comparable in population to Freckleton, but with fewer public amenities; and that Warton should be included in the plan as a village with equal status to other villages in the Fylde.

Cllr Eastham recommended that the terminology of the last sentence in the second paragraph, should be changed from “a unique visitor experience” to “a quality visitor experience.”

Treales, Roseacre and Wharles Parish Council suggested that the last sentence in the final paragraph on page 25 should be made into a new paragraph.

BAE Systems Real Estate Solutions recommended that in the fourth paragraph of the Vision there should be a clear statement of where Warton will be by 2030. They provided an example which reads: “Warton will be a Key Service Centre with a District Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Warton Enterprise Zone.”

For the tenth paragraph, BAE Systems Real Estate Solutions agreed that Warton Aerodrome is a sub-regionally important employment site. They added that reference should be made to the Lancashire Enterprise Zone and the importance this initiative has to the UK’s advanced engineering and manufacturing sector. For the 11th paragraph, they suggested that in relation to housing the sentence should read: “New homes of a type and mix to address demand and need, affordability, an ageing population and family needs will be located in suitable locations.”

Blackpool Council commented that the reference to providing a new passing point on the Blackpool South rail line appears to be premature, and also does not take account of the background text to policy T2 regarding potential double tracking of the South Fylde Line. Blackpool Council also questioned whether the Vision should reference the South Fylde Line rather than the Blackpool South rail line. They also claimed that the link road to a new junction of the M55 is important to improving road access / connectivity to the Fylde Coast, as opposed to serving new housing in Preston. Blackpool Council suggested that it may be appropriate to re-order the text to reflect this.

Kirkham Grammar School commented that the allocation and development of their off-site playing fields for residential purposes will assist in achieving a number of aspects of the Vision, including the provision of 'decent and affordable homes,' 'sufficient open space and... outdoor recreational facilities' and 'new homes of an appropriate type and mix to address affordability, an ageing population and family needs will be located in suitable locations.'

Council response

The villages referred to in the Vision are those listed in policy SD1 of the Local Plan – Preferred Option document. Non-strategic sites will be identified for development at the “Rural Villages” in the Local Plan Part 2 document. Development at the “Small Villages” will be limited to “like-for-like redevelopment of an existing property, the appropriate re-use of an existing building or minor infill development.” The majority of the development in the Local Plan – Preferred Options document is proposed at the four strategic locations where there is good access to services (or in the case of Warton, where improved services can be facilitated).

The issue of migration has been fully factored into the calculation of the final housing requirement for the Plan period. The Vision fully takes account of the housing growth proposed in the Preferred Options document. The SHLAA demonstrates that there is not enough land within the Borough's settlements to meet the Borough's housing requirement. Therefore some strategic settlement extensions need to be considered for allocation. These will be landscaped so that the quality of the landscape, in particular the views from the countryside, are protected.

The Local Plan (Part 1) takes flood risk seriously (see policy CL1), and this is reflected in the Vision. Surface water flooding is not a reason for not allowing development. The Environment Agency have advised the Council that there are normally engineering solutions to surface water issues when new development takes place, and this would take the form of appropriate Sustainable Drainage Systems. The Vision also makes extensive references to environmental issues.

The purpose of the proposed Preston Western Distributor road is to improve access to the Fylde Coast, support delivery of the North West Preston strategic housing location, overcome existing congestion on the strategic road network, release pressure off Broughton roundabout in terms of the number of vehicles and improve access from the highway network to the Enterprise Zone site at Warton. Therefore, improving access and connectivity to the Enterprise Zone at Warton is key to the Enterprise Zone and consequentially enabling the delivery of housing growth in Warton. In terms of facilities, it should be noted that paragraph 7.49, says that "improved facilities could include a GP surgery, pharmacy and new swimming pool." In terms of a GP Surgery, NHS Property Services have since confirmed that the Primary Care Centres at Lytham and Freckleton are future proofed and will therefore be able to accommodate future growth at Warton. Therefore, new provision will not be required at Warton. In terms of a swimming pool, the Council anticipates that the updated Open Space, Sport and Recreation Assessment will identify if a swimming pool is required in the Borough, and if so, where this should be located. More general comments regarding social infrastructure requirements in Warton will arise through ongoing discussions with infrastructure providers, including public health at Lancashire County Council which will inform the Infrastructure Delivery Plan.

In terms of climate change, the Vision says that "any negative effects of climate change brought about by increased energy use will be minimised, with a higher dependence on renewable and low carbon sources." This implies that such sources will minimise the impacts of increased energy use. The Council does not consider this to be a "confused" statement.

Although the Warton Parish Plan shows that residents are against large scale expansion of Warton, the Local Plan (Part 1) must be supported by a robust evidence base.

The Council agrees that Warton is currently a village comparable in population to Freckleton, but with fewer amenities. However, the Council does not agree that Warton should be included in the plan as a village with equal status to other villages in Fylde. Warton has many advantages over other settlements, including the Enterprise Zone and the proposed Preston Western Distributor road. Whilst Warton is similar in size to Freckleton, it is significantly larger than the other villages of the Borough and therefore cannot be given equal status to them. Freckleton has significant constraints to expansion including the Green Belt and Flood Risk Zone 3.

The Council agrees to amend "unique" in the second paragraph of the Vision, to "quality".

The Council agrees to include the last sentence of the Vision as a separate paragraph.

The Council agrees that further detail should be provided in the Vision on where Warton will be in 2030 and clarify whether it will be a key or local service centre by the end of the plan period. The Council will also include additional information regarding the Lancashire Enterprise Zone and its importance to the UK's advanced engineering and manufacturing sector within chapter 9 (The Fylde Economy).

The Council considers it necessary to set out clearly in the text of the Vision for Fylde, the aspirations for what the settlement hierarchy and the retail hierarchy will be at the end of the plan period, in 2030.

The Council disagrees with the suggested amendments of the 11th paragraph, the Local Plan will meet the housing need, not demand.

The Council agrees that the reference to providing a new passing point on the Blackpool South rail line is premature, as this concept is currently aspirational. The Council agrees that the rail line should be referenced as "South Fylde Line" rather than "Blackpool South Line." The South Fylde Line runs from Preston to Blackpool South Station.

The Council agrees that the text should be re-ordered in the ninth paragraph so that the benefits of the Preston Western Distributor road to the Fylde Coast are mentioned before access to the new housing in North West Preston. Many of these initiatives will be set out in the Fylde Coast Highways and Transport Masterplan, which the County Council will be consulting on in autumn 2014.

The comments made by Kirkham Grammar School are noted.

Recommendations for change

- Amend the last sentence of the second paragraph to read: "... regenerated to provide a quality visitor experience".
- Amend the fourth paragraph to set out clearly what the Council will aspire the settlement hierarchy and the retail hierarchy to be at the end of the plan period. In terms of settlement hierarchy, Warton will be a local centre and Fylde-Blackpool Periphery will become a local centre.
- Insert the following text in the fourth paragraph: "Warton will be a Local Service Centre with a Village Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Lancashire Enterprise Zone, BAE Systems, Warton" in place of the existing sentence which reads: "Warton will have developed as a result of the Enterprise Zone, with improved local services".
- Delete the reference in the ninth paragraph to providing a new passing point on the Blackpool South rail line (to be renamed "South Fylde Line").
- Amend references throughout the document to read "South Fylde Line".
- Re-order the text in the ninth paragraph so that the benefits of the Preston Western Distributor road to the Fylde Coast, are mentioned before access to the new housing in North West Preston. The sentence should say: "A link road (i.e. the Preston Western Distributor) to a new junction of the M55 will have been provided. This will

improve road access to the Enterprise Zone at Warton, the wider Fylde Coast, and serve new housing in north-west Preston, as identified in the Central Lancashire Highways and Transport Masterplan.”

- Add the following text at the end of the ninth paragraph: “All of the road and public transport improvements, mentioned here, are set out in the Fylde Coast Highways and Transport Masterplan, which will be implemented alongside this Local Plan”.
- Amend text in the tenth paragraph to read: “Opportunities for sub-regionally important employment in the advanced engineering and manufacturing sector at the Lancashire Enterprise Zone (BAE Systems at Warton); Blackpool International Airport and Whitehills will have been realised and employment will have been provided close to where people live”.
- Amend the last sentence of the final paragraph of the vision to be a separate paragraph, i.e. “All development will have respected and conserved the individual character of the villages”.

Chapter 4: Strategic Objectives

Chapter 4: Strategic Objectives

Number of representations:			
Comment	Support	Object	Total
12	5	9	25 ⁶

Representations received from:

- English Heritage
- Environment Agency
- Natural England
- Sport England
- United Utilities
- Campaign to Protect Rural England (CPRE) – Fylde District
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Blackpool Council
- The Minority Group Report
- AXA Insurance
- BAE Systems Real Estate Solutions
- Kirkham Grammar School
- 3 residents
- 2 residential developers

What you said

Kirkham Grammar School state that the strategic objectives will be met by the allocation and development of the Kirkham Grammar School playing fields site for housing.

United Utilities questioned whether 'Authority Monitoring Report' should read 'Annual Monitoring Report.'

Objective 1 – To Create Sustainable Communities

A resident claimed that this objective does not address community sustainability. The resident commented that increasing Warton at the expense of Freckleton makes Freckleton less viable; and that increasing the size of Warton will not bring Warton's facilities back. The resident suggested that increasing the size of Warton will not bring a pharmacy or a doctor; and that a supermarket at Warton will have a detrimental impact on other supermarkets in the area. The resident claimed that the Council has failed to address the retail balance across the Borough.

⁶ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

A resident suggested that the majority of the sites proposed for building in the Plan are greenfield; and that this is a cost saving exercise that has nothing to do with planning. The resident said that the Plan should identify previously developed sites.

AXA Insurance claimed that they own land that is deliverable and developable and are willing to bring this land forward for housing. AXA Insurance supported the need to bring forward housing, but that they believe the strategy for Lytham St Annes is flawed as it does not allow for a range and choice of sites and focuses too much development in one location. AXA Insurance gave the view that the SHLAA has incorrectly assessed the deliverability of this site.

BAE Systems Real Estate Solutions agreed that previously developed sites should be used in preference to greenfield land. They suggested that part 3 of the objective should be amended to read: "Bring forward a responsive and deliverable supply of housing land..." BAE Systems Real Estate Solutions claimed that this would be in line with NPPF paragraph 47.

A residential developer suggested that there is a need to ensure that the housing needs of the community are achieved and that a flexible supply of housing land is provided. However, they questioned whether this will be the case as the evidence is not fully in place and relying on the Regional Spatial Strategy may not be enough. They claimed that the Plan fails to fully set out the objectively assessed need for housing and that this could have serious ramifications as the Plan progresses.

The Environment Agency supported the Objectives but that the only reference to site investigation and remediation in the Plan is in Objective 1, apart from in Appendix 1 which makes reference to paragraphs 121 and 122 of the NPPF. The EA added that this should probably be paragraphs 120 and 121 of the NPPF. The EA felt that it is important that the remediation of contaminated land should be incorporated into a policy, either in Part 1 or Part 2. They suggested that if included in Part 1, policies HW1 and CL1 may be appropriate. The EA aim to secure a level of remediation in parallel with national criteria set in the Local Plan.

Objective 2 – To Improve the Environment

A resident suggested that this objective has been compromised by the failure to address environmental sustainability and to engage with the Borough's residents regarding the level of inward migration that the area can sustain. The resident claimed that every environmental risk that the objective seeks to address is compromised by building on green fields.

A resident supported Objective 2, but would like a review of the Green Belt to prevent the urban sprawl of Blackpool.

BAE Systems Real Estate Solutions supported the initiative for the Ribble Coast and Wetlands Regional Park; and would like to be involved in this initiative to ensure that the proposals can align with the operational requirements of the Aerodrome and the respective aviation authorities.

Natural England welcomed this objective, but recommended that soils and geodiversity are also referred to. They recommended that the Plan identifies a requirement for developers to agree the details of buffer design with the Wildlife Trust and other relevant bodies, so as to ensure adequate protection of sites and maintenance of habitat connectivity. In relation to recreational disturbance impacts affecting designated sites, Natural England commented that mitigation is likely to include provision of green infrastructure. In line with NPPF

requirements for ecological enhancement, Natural England said that all development should aspire to net biodiversity gain wherever possible. They added that protected and biodiversity action plan (BAP) species and their habitats should be protected and enhanced through the Local Plan; and that it should identify the requirement for planning applications to be accompanied by detailed ecological assessment, mitigation and enhancement proposals.

Objective 3 – Making Services Accessible

A resident commented that the situation for this objective is much the same as that stated for objective 2 [see first paragraph under 'Objective 2' above]. In relation to the South Fylde Line, Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested that the objective should be extended to include a passing loop. He also recommended that the objective should include a park and ride and pedestrian lift at Kirkham and Wesham Station. Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors also commented that greater access should be encouraged at other stations in the Borough, and that bus and train travel should be more integrated. The Cllr considered that the M55 – Heyhouses link road is long overdue; and that the provision and enforcement of disabled parking is woeful.

Blackpool Council suggested that it would be better to state “improving” the South Fylde Line, as opposed to “promoting” it.

English Heritage welcomed this objective.

A residential developer welcomed the recognition in Objective 3 that new housing in sustainable rural villages can reduce rural isolation by protecting and providing services. However, they suggested that the objective be expanded to make reference to sustaining and improving education provision in rural areas.

Objective 4 – To Diversify and Grow the Local Economy

A resident suggested that the situation for this objective is much the same as that stated for objective 2 [see first paragraph of 'Objective 2' above]. The CPRE – Fylde District commended this objective. Another resident gave particular support to part 9 of this objective, but commented that more emphasis should be given to food security. The Minority Group Report raised concerns over development impact on taking land out of food production.

In relation to Part 5 of the objective, Cllr Eastham suggested that the Fylde area could be promoted as a successful commuting asset for Preston and the wider Lancashire area.

English Heritage welcomed this objective, but was concerned that there was no definition and explanation of the classic resort concept within the Plan. English Heritage also commented that specific reference should be made to the historic environment and pick out aspects of the historic environment that are important to the Borough, along with the contribution that the historic environment makes to the local economy.

English Heritage recommended that the importance of the historic environment should be a key objective in this section, and that an additional criterion should be introduced as follows: “Recognise the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement.”

English Heritage noted that reference is made in chapter 2 to improving the economy of Kirkham, including the quality of the built environment, but that this is not mentioned in Objective 4. English Heritage therefore questioned whether this is a key priority.

BAE Systems Real Estate Solutions agreed with parts 3 and 5 of this objective, but suggested that part 5 should read: "...BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton..." They also said that part 8 should make reference to the creation of Centres in need of retail and associated provision, such as Warton.

Objective 5 – To Develop Socially Cohesive, Diverse, and Healthy Communities

A resident suggested that the situation for this objective is much the same as that stated for objective 2 [see first paragraph of 'Objective 2' above]. In terms of "engaging and empowering local communities", the resident commented that the consultation process that the Council has engaged in falls well below what is necessary.

A resident was concerned that the Plan does not take account of the Bryning with Warton Parish Plan; and that it is not acceptable for the Council to refer to changes in legislation requiring Neighbourhood Plans, since there has been insufficient time to allow the Parish Plan to be converted to the new format. The residents added that the Parish Plan is still valid and reflects the views of the populace of Warton.

Sport England suggested rewording part 3 of Objective 5 to "Protecting, increasing and enhancing open space sport and recreation provision throughout the Borough". Sport England also recommended rewording part 4 of Objective 5 to "Promoting good health and wellbeing by providing accessible high quality open space sport and recreation in association with new developments." One of the Playing Pitch Strategy scenarios will be to establish the impact of housing growth on existing and new outdoor sport provision. This in turn will inform policy recommendations and the action plan which can then be directly linked to individual housing developments. Sport England welcomed the inclusion of sports facilities in part 8 of Objective 5.

Council response

The comments made by Kirkham Grammar School are noted.

The Council notes United Utilities comments regarding the suggested amendment to the 'Authority Monitoring Report' to 'Annual Monitoring Report' in paragraph 4.2. However, it is no longer a requirement to prepare the Monitoring Report on an annual basis.

The Council agrees with the Environment Agency to amend the reference in Appendix 1 under contaminated land to read: "paragraphs 120 and 121" of the NPPF.

In response to the claim that the majority of the sites proposed for building in the Plan are greenfield, text in paragraph 6.2 of chapter 4: The Spatial Development Framework says: "the Strategic Housing Land Availability Assessment 2012 update (SHLAA) indicates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the edge of existing settlements".

The residents' concerns about any future development in Warton are noted and are dealt with under policy SL3 in chapter 7. The Council has reviewed Parish Plans as part of the Local Plan preparation process. It will be important for the Council and Parish / Town

Councils producing Neighbourhood Plans to work together to ensure they align with the Local Plan and Neighbourhood Plans.

AXA Insurance's concern regarding the strategy for Lytham St Annes is noted.

The Council agrees with BAE Systems Real Estate Solutions that part 3 of Objective 1 should be amended to read: "Bring forward a responsive and deliverable supply of housing land..."

The Council agrees with Blackpool Council that it would be better to state "improving" the South Fylde Line, as opposed to "promoting" it under Objective 3.

The issues raised by English Heritage regarding the classic resort concept and that specific reference needs to be made to the historic environment, together with its contribution to the local economy, are dealt with in chapters 9 and 14.

The Council agrees with English Heritage that the importance of the historic environment should be a key objective in chapter 4, and that an additional criterion should be introduced as follows: "Recognising the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement."

The Council agrees with BAE Systems Real Estate Solutions that part 5 of Objective 4 should read: "...BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton..."

BAE Systems Real Estate Solutions comments that part 8 of Objective 4 should make reference to the creation of Centres in need of retail and associated provision, such as Warton are noted. However, Warton will be covered by an amended part 8 of Objective 4, i.e. "promoting the continuing improvement of the vitality and viability of the town, district / village and local centres".

Equally, the Council considers that there is no need to refer specifically to Kirkham and the quality of the built environment in Objective 4, as it is already covered by the wording of amended part 8 of objective 4 "promoting the continuing improvement of the vitality and viability of town, district / village and local centres".

The Council agrees to amend part 3 and part 4 of Objective 5 in line with the wording proposed by Sport England. Sport England's support for the inclusion of sports facilities in part 8 of Objective 5 is noted.

The resident's concerns regarding the consultation process that the Council engaged in and the claim that it fell well below what is necessary, are misplaced. The Council embarked on an 8 week consultation programme, which included public meetings and consultation events. The statutory recommended time-frame for consultations on policy documents is a minimum of 6 weeks. Consequently, the Council considers that it went out for consultation with the public, longer than the statutory timeframe.

Recommendations for change

- Amend part 3 of Objective 1 to read: "Bring forward a responsive and deliverable supply of housing land..."

- Amend part 3 of Objective 3 by inserting “improving” the South Fylde Line, in place of “promoting” it.
- Agree that part 5 of Objective 4 should read: “...BAE Systems Warton Aerodrome, Lancashire Enterprise Zone at Warton...”
- Amend part 8 of Objective 4 to read “promoting the continuing improvement of the vitality and viability of the town, district / village and local centres”.
- Add an additional criterion (part 10) to Objective 4 saying: “Recognising the importance of the historic environment and the contribution it makes to the local economy through promoting opportunities for its conservation and enhancement.”
- Amend part 3 of Objective 5 to read: “Protecting, increasing and enhancing open space sport and recreation provision throughout the Borough”.
- Amend part 4 of Objective 5 to read “Promoting good health and wellbeing by providing accessible high quality open space sport and recreation in association with new developments.”
- Amend Appendix 1 of the Preferred Options, which makes reference to “paragraphs 121 and 122” of the NPPF and replace with reference to “paragraphs 120 and 121”.

Chapter 5: National, Regional and Sub Regional Policy

Chapter 5: National, Regional and Sub Regional Policy

Number of representations:			
Comment	Support	Object	Total
17	0	14	31 ⁷

Representations received from:

- Bryning with Warton Parish Council
- Councillor Eastham
- Lancashire County Council
- Wyre Borough Council
- Blackpool Council
- Blackpool International Airport
- BAE Systems Real Estate Solutions
- Home Builders Federation
- Wesham Action Group
- 8 Residents
- 4 Residential Developers
- 1 Mixed Use Developer

What you said

Green Belt Review

There were comments from residents that there should be a review of the Green Belt, and that the Green Belt boundary should move back to the position it was in from before the original bypass was proposed. Bryning with Warton Parish Council resolved that Fylde Council should consider a review of Green Belt as a matter of urgency and before final approval of the Local Plan to 2030 Part 1.

Blackpool International Airport are seeking a policy framework which provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Some residents questioned why the Great Birchwood site keeps being rejected for housing, and that if the site is Green Belt land, whether or not the strategic sites at Warton are also Green Belt land? Some residents confirmed that the owners of the Great Birchwood site, which is brownfield land in the Green Belt, believe that this could and should be built on.

Some residents commented that it is too late to leave a review of the Green Belt until the Local Plan Part 2. They said that some Green Belt might be more appropriately classed as greenfield, allowing other opportunities for development. They added that Green Belt land north of Freckleton could be used for housing, as the land has good access to the Freckleton

⁷ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

bypass and the future M55 Link Road (i.e. the Preston Western Distributor); has good bus routes; and would boost Freckleton.

A residential developer suggested that it is the Core Strategy stage of a Local Plan that should be the stage for reviewing Green Belt boundaries, rather than on a site by site basis in the Site Allocations document; and that this is set out in the NPPF.

A mixed use developer recommended the deletion of the reference to the Regional Spatial Strategy requirement for no Green Belt review before the end of the Spatial Strategy period (to 2021), as it is out of date. They also said that the need for Green Belt review needs to be considered for the whole of the Local Plan period (to 2030). They suggested that the findings of the forthcoming Strategic Housing Market Assessment (SHMA) will have implications for the need to release land from the Green Belt.

They went on to comment that although the Plan allocates sites in the Lytham St Annes area, they consider that this is not likely to be sufficient to meet this area's needs, and will therefore require the release of sustainable Green Belt land. They suggested a site on the edge of St Annes (Leach Lane), which they consider to be sustainable and could be released for housing without harming the Green Belt.

Duty to Co-operate

A resident commented that the NPPF requires the Council to provide evidence of joint working on housing delivery. The residential developers and the Home Builders Federation claimed that the Plan is not clear on how the Duty to Co-operate is being met. They particularly questioned how the needs of neighbouring authorities are being met. A residential developer therefore suggested that the Plan has not been positively prepared and cannot be considered 'sound'.

A residential developer claimed that neighbouring councils are using the Regional Spatial Strategy housing figures, and that their housing requirements have therefore not been objectively assessed in the context of current circumstances. The Home Builders Federation and a resident both made similar comments.

Some residential developers suggested that the Council should ensure that new assessments on the housing needs of Fylde should include an assessment of unmet housing needs from Blackpool, Wyre and the Central Lancashire area. The Home Builders Federation made similar comments, and also stated that it is essential that the Council goes beyond merely consulting with neighbouring authorities, but should implement actions and have evidence of high level agreements to tackle strategic issues.

A resident commented that the extent to which the Plan makes provision for cross-boundary planning issues will be a consideration of its soundness. Some residential developers suggested that the Council should examine the issues with Kirklees Council and Hart's Council's Core Strategies. They added that the Council should ensure that new assessments on the housing needs of Fylde should include an assessment of unmet housing needs from neighbouring councils; and the Home Builders Federation also made similar comments.

A resident objected to the Duty to Co-operate, with particular regard to housing issues with Blackpool. The resident claimed that Blackpool have argued that they can run their own affairs and that they are a distinctively different type of Borough to Fylde. The resident also asked if Blackpool's housing requirement will increase Fylde's housing numbers.

Wyre Council made reference to the benefits of the Memorandum of Understanding, prepared by Lancashire County Council and the three Fylde Coast local authorities.

Blackpool Council welcomed the commitment of Fylde to provide additional employment land to meet Blackpool's employment land needs. However, Lancashire County Council highlighted that in paragraph 5.16 the area of employment land to meet Blackpool's requirements is 14 ha, but at paragraph 9.10 it is 15 ha. Lancashire County Council was concerned that there is a need for consistency in the figures. Blackpool Council raised no objection to the figure being rounded up to 15 ha, as this will provide greater flexibility and choice for the Fylde sub-regional economy.

Housing Requirement

Some residents suggested that the housing requirement is not evidence-based nor justified; and that the Preferred Options consultation should be suspended and the document withdrawn until the Council can support its own housing requirement along with detailed evidence and reasoned justification. They also claimed that the housing figures used in the consultation are obsolete; should be much lower; and should not include the shortfall since the start of the Regional Spatial Strategy period in 2003.

Wesham Action Group was concerned that the Plan talks about the revocation of the Regional Spatial Strategy, but then goes on to use the regional housing requirement, and there is no mention of how any backlog will be dealt with. The Action Group suggested that ONS statistics have not been accurate over the last 20 years, and that 306 houses per year is totally inaccurate as there never has nor will there ever be a demand for this level of housing. The Action Group also highlighted that the Minority Group Report also questions the evidence base. The Action Group suggested that the Planning Department's approach to recent appeals, where they have withdrawn their case at Kirkham and Wesham, has shown a high level of incompetence.

A residential developer objected to the use of Regional Spatial Strategy figures when establishing the housing requirement as this is out of date and is inconsistent with national policy. They also claimed that both the SHMA and the Council's "Defining Housing Requirements for New Homes in Fylde" are out of date, and the Home Builders Federation made similar comments. A residential developer claimed that the Regional Spatial Strategy was only applicable up to 2020 / 21 and therefore does not consider housing needs for the last ten years of the Plan period.

Some residential developers were concerned about the reassessment of the figures being left so late in the process. They recommended that the Council should produce an updated SHMA. Some residential developers added that the SHMA should include an assessment which considers the implications of an ageing and decreasing population for Fylde. The Home Builders Federation considered that an updated SHMA should take account of the government's SHMA Practice Guidance, which is likely to be updated.

A residential developer claimed that using the Regional Spatial Strategy housing figure is not satisfactory, and that instead an objectively assessed housing requirement should have been identified using up to date information. A mixed use developer and the Home Builders Federation both made similar comments.

Some residential developers noted that there have been objections to the Plan's housing targets due to population trends showing a decreasing population. However, they said that this will have a negative impact on the local economy and services; that the trend could be due to a lack of housing delivery; that the NPPF seeks to positively boost the supply of housing; and that simple reliance on past population trends is not a reliable source of information in itself to base housing needs upon.

Other issues

BAE Systems Real Estate Solutions recommended that within the paragraphs summarising the NPPF there should be a section on 'Ensuring Viability and Deliverability' (see paragraphs 173-177 of the NPPF), as this is an important principle of plan-making.

Cllr Eastham questioned whether it would be necessary to list all of the revoked Regional Spatial Strategy policies that have implications for the Local Plan in the next version of the Local Plan (Part 1).

Council response

The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. The Council has demonstrated through its Strategic Housing Land Availability Assessment (SHLAA) that there is sufficient land located outside the Green Belt to meet the borough housing requirement. The Council is therefore not proposing a strategic review of the Green Belt, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.

The Council considers that the Great Birchwood site, west of Warton, could be an appropriate location for a secondary school, but there are issues with the site as it is located within the Green Belt, in Flood Risk Zone 3 and it is located some distance from the centre of Warton. The Council agreed that discussions with Lancashire County Council via the Education Liaison Group, regarding a new secondary school in Fylde, needed to be continued to establish whether there was still the need for a school and where it should be located.

In terms of the Duty to Co-operate with neighbouring authorities in the Lancashire sub-region, the Council along with the other two Fylde Coast local authorities: Wyre Borough Council and Blackpool Council, together with Lancashire County Council has produced a Memorandum of Understanding. This should ensure closer ties and joined-up thinking on the delivery of strategic planning across the Fylde Coast. The Council have close working relationships with Preston and the wider Lancashire authorities. The Council will continue to satisfy the requirements of the Duty to Co-operate and will publicise the steps that have been taken to achieve this in the AMR.

The concerns raised by Lancashire County Council are noted under paragraph 5.16 where the area of employment land to meet Blackpool's requirements is 14 ha, but at paragraph 9.10 it is 15 ha is an omission which will be rectified. The text will be amended to refer to 14 ha.

The Housing Requirement will be updated as a result of the SHMA 2014 and the Viability Assessment 2014. Further Council comments in relation to the SHMA are available in chapter 6.

Comments relating specifically to housing development at Blackpool International Airport are dealt with under chapter 6. Comments relating specifically to commercial development at Blackpool International Airport are dealt with under policy T2 in chapter 12.

The Council agrees with BAE Systems Real Estate Solutions recommendation, that within the paragraphs summarising the NPPF there should be a section on 'Ensuring Viability and Deliverability' (see paragraphs 173-177 of the NPPF).

The Council included relevant revoked Regional Spatial Strategy policies in the Preferred Options document of the Local Plan to provide a context; it is not proposed to include this information in the next version of the Local Plan.

Recommendations for change

- Add new paragraph 5.2a of the Preferred Options document saying: “In accordance with the NPPF, the local plan should be deliverable and necessary infrastructure, to deliver the proposed development in the Local Plan, will be provided in a timely fashion.”
- Amend paragraph 5.12 of the Preferred Options document to read: “The local authority areas of Blackpool, Wyre, West Lancashire, Preston (Central Lancashire Authority) and South Ribble (Central Lancashire Authority) are adjacent to Fylde Borough”.
- Retain the reference in paragraph 5.16 of the Preferred Options to “**14 ha** of employment land within the Fylde boundary, to meet Blackpool’s requirement up to 2027”.
- Delete the section on “Policies of regional importance”, which includes the revoked Regional Spatial Strategy policies from chapter 5, as it is not proposed to include this information in the next version of the Local Plan.

Policy NP1: Presumption in favour of sustainable development**Number of representations:**

Comment	Support	Object	Total
4	6	33	43 ⁸

Representations received from:

- Ribby with Wrea Parish Council
- Highways Agency
- Kirkham Grammar School
- 1 Retail Developer
- 35 Residents
- 4 Residential Developers

What you said

Residents suggested that this policy does not explain sufficiently strongly or clearly what should be regarded as sustainable development in the context of Fylde. They said that this should be clearly and unambiguously set out following a thorough consultation with Fylde residents about what ‘sustainable’ means.

A resident commented that their understanding of ‘sustainable’ is also to maintain existing environments and buildings for future generations. The resident provided an example that the roads and pavements are in poor repair and that builders have damaged streets. The resident also commented that the countryside is worth caring for. Another resident

⁸ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

suggested that working exclusively with developers on pre-application advice breeds distrust within the community and frequently results in protests that can be costly and avoided if community involvement takes place as part of the pre-application process.

Ribby with Wrea Parish Council suggested that sustainability is a key ingredient, and that it is essential that realistic and defensible development assessments are made, and that amenities that will not benefit the local community are not provided.

Two residential developers said that they support the inclusion of policy NP1 as it conforms to the NPPF and it recognises the need to boost significantly the supply of housing in sustainable locations. A residential developer added that the Council needs to ensure that other policies in the Plan do not contradict this presumption in favour of sustainable development.

Two residential developers said that they support the content of policy NP1. A retail developer supported policy NP1 and welcomed this positive and proactive approach to considering development proposals.

The Highways Agency supported the general principle of taking a positive approach towards the presumption in favour of sustainable development and the intention to engage proactively with applicants to find solutions to proposals to secure developments in the Borough.

Kirkham Grammar School confirmed that the school Governors are committed to working with the Council to bring forward sustainable development on the schools playing fields on site M3.

Council response

The NPPF suggests the presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision-taking. The NPPF refers to the Brundtland definition of sustainability and goes on to refer to the “*policies in paragraph 18 to 219 (of the NPPF), taken as a whole, constitute the Government’s view of what sustainable development in England means in practice for the planning system*”.

Sustainable development is a ‘golden thread’ which runs through the emerging Local Plan. The Council will include a statement in chapter 1 that the Local Plan should be read as a whole.

The comments made by Ribby with Wrea Parish Council, the Highways Agency and Kirkham Grammar School are noted.

The support given by the retail developer is noted. The support given by some residential developers to the policy is supported.

Recommendations for change

- None

Chapter 6: The Spatial Development Framework

Chapter 6 General Comments:

Number of representations:

Comment	Support	Object	Total
40	4	197	241 ⁹

Representations received from:

- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- Home Builders Federation
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Ribby with Wrea Parish Council
- Bryning with Warton Parish Council
- Elswick Parish Council
- Singleton Parish Council
- Councillor Eastham
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Lytham St Annes Civic Society
- The Minority Group Report
- Blackpool Council
- South Ribble Borough Council
- Wyre Borough Council
- Blackpool International Airport
- AXA Insurance
- 15 residential developers
- 2 Action Groups
- 173 Residents

What you said

Housing requirement

The majority of comments received in relation to chapter 6 focused on the housing requirement, suggesting the figure was too high or too low.

Elswick Parish Council suggested the annual housing requirement of 341 per year is excessive, considering employment is in decline and the borough has a higher mortality than birth rate. The figure is partly linked to migration into the borough, however shale gas exploitation may effect this trend. Houses should be built close to areas of employment, reducing congestion and use of carbon fuels. A resident also suggested shale gas exploration will reduce immigration into Fylde.

⁹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

Treales, Roseacre and Wharles Parish Council questioned the housing forecast evidence which is out of date (pre- recession) and no longer supported (Regional Spatial Strategy). Up to date population and housing forecast modelling which is transparent should be incorporated into the Local Plan. The Parish Council questioned the level of consideration of the type and density of dwellings needed for the demographic characteristics of the Fylde Coast e.g. Retirement, and the level of considerations to deterioration of housing stock and redevelopment.

Bryning with Warton Parish Council questioned the housing requirement methodology and rationale for justifying the Preferred Options housing requirement, reference was made to current vacant and available housing in the area. The Parish Councils response stated they and a large proportion of residents support necessary proportional housing development within the village, which meets the principles of 'Sustainable Development'. The Parish Council referred to GEC Marconi and Nine Acres nursery sites which they claim will far exceed the local requirement. They also suggested the development is proportionally more than any other village in the borough, despite a lack of infrastructure. Warton should remain a village. Any proposed development should be suspended pending approval of the Local Plan and Neighbourhood Plan. Affordable housing should only be to meet the needs of the settlement.

Ribby with Wrea Parish Council were generally in agreement with the draft Local Plan, however, the most up to date housing requirement calculations should be used, which is key for an area with inward migration. The Parish Council agreed with the Minority Group Report.

CPRE – Fylde District suggested that paragraph 6.20 of the Preferred Options document misrepresents the 2011 ONS household projections, when in fact, the 2011 projections are lower than the Preferred Option. CPRE – Fylde District and many residents said that any new assessment from a new baseline should not include the deficit since 2003. Residents suggested the past housing requirement(s) were over-estimated which has led to the current deficit.

In relation to the housing requirement, The Minority Group Report commented that the demographics show that more people are dying than are born in Fylde and household fragmentation is not as great as is shown. Fylde should not lose too much greenfield land to accommodate inward migration. The Fordham Housing Need Assessments inflated housing need. New ONS statistics need to be taken into account and smaller house sizes due to elderly residents should be factored in. The evidence base overstates the need.

An action group suggested the housing requirement is not supported by the most up-to-date information, they also suggested the evidence indicates a lower figure.

Lytham St. Annes Civic Society suggested that the need to build houses should not override other considerations. The civic society also raised concerns over housing requirement.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors considered that empty properties, including refurbishments should be given greater priority. If the housing demand was great, there would be fewer empty properties. This suggests the housing requirement needs revisiting.

Residents questioned whether the existing calculations include all existing planning permissions, including schemes which are yet to be built. Many residents said the housing requirement is too high, and higher than that proposed in the Issues and Options document. Bringing empty homes back into use to increase supply was suggested. Another resident suggested past build-out rates should be rolled forward as the boroughs housing

requirement as this is what the market has delivered. A resident said the housing requirement should consider the age shift in its modelling, with a growth in elderly residents requiring small units, occupying fewer green fields.

Wyre Borough Council referred to the jointly commissioned SHMA and suggested the Council should have regard to the findings in setting the housing provision for Fylde in the Local Plan.

Residents and residential developers were concerned that the housing evidence base is not being dealt with until the next change which may lead to fundamental changes to the Preferred Options document.

The Home Builders Federation and many residential developers suggested the housing requirement is out of date and not based on latest evidence, with the overall supply of 306pa too low. Residential developers suggested that the requirement does not fully meet the objectively assessed needs of the borough as the affordable housing requirement is far in excess of the likely delivery rate in the Local Plan. A new SHMA was suggested to inform the Council.

The Home Builders Federation encouraged the Council to involve members of the local development industry in the production of the housing evidence to provide realistic views of the local market and development costs. In producing the evidence, they suggested that past delivery should not be rolled forward as previous strategic policy has impeded development.

Some developers suggested the current housing requirement does not meet economic projections to support the economy. It was suggested that perceived infrastructure constraints do not justify a lower housing requirement. Fylde has a very low supply of housing and this shortfall should be taken into consideration.

A residential developer suggested that the housing requirement is not explicitly stated in any plan policy. The Home Builders Federation and developer suggested the housing requirement and provision should both be shown as net in the plan.

Blackpool Council suggested the Local Plan should clarify that the percentage of residential development referred to new development.

Blackpool International Airport are seeking a policy framework which provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting Blackpool International Airport).

Plan Period

CPRE - Fylde District commented on the plan period, suggesting reference to a 20-year period is inconsistent and leads to misleading comparison with the ONS 2011 projections.

A number of residential developers also questioned the plan period and that it should be explicitly set out from the outset, the title of the plan should be altered to reflect this.

Economic Viability

The Home Builders Federation, residential developers and residents questioned the lack of an economic viability appraisal of the cumulative impact of plan policies and obligations on viability and deliverability of the plan. Concerns were raised that this evidence was not being dealt with until the Publication stage which may lead to fundamental changes to the document.

Deliverability

A resident suggested that large schemes, such as Whyndyke Farm should be fully delivered in the plan period, reducing the amount of greenfield sites. Another resident questioned why the Local Plan shows a lower level of dwellings compared to the approved schemes and pending applications at Queensway and Whyndyke Farm respectively.

The Home Builders Federation and some residential developers questioned the deliverability of the Local Plan, with a reliance on a small number of larger strategic sites, with the failure of one or more sites compromising the plan. A significant element of flexibility should be built into the plan.

Employment Requirement

Many residents questioned whether there is an oversupply of employment land, suggesting the surplus could be used for housing, avoiding the need for greenfield sites.

Treales, Roseacre and Wharles Parish Council suggested land within the Lancashire Enterprise Zone, BAE Systems, Warton should be included in the borough employment land requirement, avoiding the need to release greenfield sites.

Heritage

English Heritage welcomed references in paragraph 6.6 and 6.16 to retaining Fylde's distinctive local characteristics and unique qualities.

English Heritage raised concerns over no reference to the impact of development on the historic environment and opportunities to enhance, with a suggestion to amend paragraph 6.3 to read 'enhance Fylde's historic, environmental, social and economic assets'. English Heritage suggested an assessment should be made to identify land, which would be inappropriate for development because of its historic significance. An assessment is needed to define what is important and assess the contributions it makes to the character of the area and to inform the retention of the Borough's unique qualities.

Previously Developed Land (Brownfield)

BAE Systems Real Estate Solutions suggested future SHLAA updates may identify additional brownfield land which could contribute towards the housing land supply. It is suggested that Warton is identified as a broad location for growth which could include brownfield land without it identifying specific sites, in line with paragraph 47 of the NPPF.

Many residents suggested brownfield land should be given development priority over green field sites.

Green Belt

A residential developer suggested that the Council would not be able to conclude if a Green Belt review was needed until the SHMA findings were available. Green Belt release may be required to meet the need in sustainable locations. Green Belt review should be undertaken in Part 1 of the Local Plan. The residential developer suggested a site at Leach Lane, St Annes for consideration.

Key Service Centres

Blackpool Council in relation to paragraph 6.8 sought different terminology to differentiate the role of the Fylde-Blackpool Periphery from Lytham, St Anne's and Kirkham.

BAE Systems Real Estate Solutions suggested section 6.8 should be clear that Warton will become a Key Service Centre as referred to in Appendix 2. Warton already contains many

of the attributes of a Key Service Centre, with a range of housing and significant employment opportunities.

Windfall and small sites allowance

CPRE – Fylde District questioned whether the windfall allowance included conversions as historically conversions alone account for 30 dwellings per annum. They also pointed out that 31% of the boroughs requirement will be required on unallocated sites (windfall and small sites).

A residential developer raised concern over no evidence to justify inclusion of a windfall allowance at 30 dwellings per annum.

A residential developer questioned the inclusion of a windfall allowance, and referred to the recent Inspectors decision on the Selby Core Strategy where the allowance was removed from annual plan targets and added as a buffer. Some residential developers suggested the windfall allowance should not be included beyond the first 5 years of the plan period as it reduces certainty and goes against paragraph 47 of the NPPF.

A residential developer suggested that the plan lacked clarification as to which settlements are included within the windfall allowance and questioned the distribution across rural villages.

A developer / landowner supported the distribution of small sites and windfall allowance across the plan period, suggesting in reality that windfall would account for the greater amount of allowance in years 1-6, with small sites higher following adoption of Part 2 of the Local Plan. Windfall and small sites should be separate categories to reflect this.

Rural settlements

A residential developer suggested that there should be a greater proportion of growth made up at more sustainable rural settlements, this would assist in addressing the acute need for affordable housing and promote social inclusion.

Five Year Supply

The Home Builders Federation and many residential developers suggested that the housing deficit should be met in the first five years of the plan. It was suggested that the five year supply is a minimum and a 20% buffer is required due to persistent under delivery in Fylde. It was suggested that the housing requirement does not include the 20% buffer on the housing requirement.

A residential developer suggested the five year supply methodology is flawed and not clear in the Preferred Options document.

Broad Distribution of Development to 2030 Table

A residential developer questioned the dwellings supply in year 1-6 in the table which does not provide a five year supply. An inconsistency in the figure in year 1-6 in the table and the trajectory was also mentioned.

A residential developer suggested the gross distribution table should include the distribution figure for rural and small villages so that applications can be considered in accordance with that figure ahead of the allocations document.

Planning applications

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested no further large scale residential applications should be approved until existing permitted schemes are built out. The length of approval should be reduced or conditions

used to ensure substantive phases of the development take place. Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors went on to suggest that it is pointless having an agreed plan if the policies are not informing decision making, e.g. recent approval of residential accommodation in a designated tourism area (TREC 1).

Consultation

Treales, Roseacre and Wharles Parish Council suggested there should be a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations.

Cllr Eastham questioned whether it is appropriate to include 'what you said' and 'alternative options considered' in the next version of the Local Plan (Part 1).

Duty to Co-operate

South Ribble Borough Council would like continued involvement on cross boundary issues and to be kept informed of emerging minerals safeguarding policies on topics such as shale gas exploration and whether this may impact on Special Protection Area / Ramsar sites at the Ribble and Alt Estuary. South Ribble Borough Council claimed that the minerals safeguarding map within the Preferred Options document is unclear / too small.

Lytham St Annes

AXA Insurance agreed that the existing urban area is not able to supply enough sites to satisfy the development needs of Fylde. AXA Insurance is willing to bring forward land in its ownership on the edge of the urban area to deliver more housing.

Fylde-Blackpool Periphery

Singleton Parish Council re-stated their preference for option 5, with housing located at Whyndyke Farm and industrial located at the B & Q site.

There was support from residents for development at the Fylde-Blackpool Periphery. An action group stated that the wastewater capacity should be resolved to make Whyndyke Farm development viable.

A residential developer suggested development at the Fylde-Blackpool Periphery would operate as part of Blackpool's housing market and not Fylde's.

Warton

There was support from some residential developers for the inclusion of their land in Warton for residential development. They also suggested that their site could deliver higher numbers of dwellings than the Preferred Options propose.

Many residents were against development at Warton because of the lack of infrastructure; poor transport access even after the construction of a new junction 2 on the M55; the destruction of village identity; build-out rates will not provide sufficient time for infrastructure provision; development is disproportionate; increasing the number of residents will not increase service provision which is available at neighbouring service centres.

Kirkham and Wesham

Some residential developers suggested there should be a higher proportion of development at Kirkham and Wesham. A residential developer questioned why the distribution is lower at Kirkham and Wesham and higher at Warton than the options put forward at Issues and Options stage. It was suggested that proposals to strengthen Kirkham as a key service centre is not undermined by Warton development.

A residential developer suggested Kirkham and Wesham should be considered as one settlement for the purposes of spatial planning policy.

Council response

Housing requirement

Many comments were received to chapter 6 and throughout the Preferred Options document objecting to the housing requirement. Many respondents commented that the evidence was out of date, some respondents thought the figure used was too high, others said it was too low.

Fylde, Blackpool and Wyre Councils jointly commissioned a Fylde Coast Strategic Housing Market Assessment (SHMA) which was published in June 2014, replacing the SHMA 2008 which is out of date. It is intended that the Council will use the findings of the new SHMA to inform the next version of the Local Plan.

The new SHMA provides an up-to-date evidence base of housing needs and demand across the Fylde Coast. It provides evidence of how many dwellings of different tenures will be needed over the next fifteen years and beyond. The SHMA will also enable a greater understanding of the dynamics and drivers of the sub-regional housing market, and will allow the identification of actions that will help to deliver better housing and socio-economic outcomes for those living in the Fylde Coast sub region.

The objectively assessed need for Fylde lies between 300-420 dwellings per annum. Fylde Council will use evidence provided in the new SHMA as a starting point in developing a local housing requirement figure for Fylde. However, both the NPPF and the NPPG make it clear that the housing figure must be developed in conjunction with economic aspirations and the need to provide affordable housing. For Fylde, the new SHMA identifies a need for 207 affordable dwellings per year (this number forms part of the objectively assessed need).

The Draft Local Housing Requirement Paper takes account of the findings of the SHMA, the NPPF, the NPPG, and adopted and emerging Fylde Council policy. It also considers local issues including economic growth, the Lancashire Enterprise Zone, levels of in-commuting, historical delivery and type and tenure of housing required. Technical issues of supply such as the amount of deliverable land available, infrastructure and the relationship between the supply of land allocated / with permission and completions plus backlog are also factored into the decision making process.

Once the new figure has been agreed, it will be used to determine how much land will be allocated for housing development in the next version of the Local Plan (Part 1) to the year 2030. In relation to the housing requirement and evidence, the Council agrees to add a new policy in chapter 10, which deals with the housing, similar to the approach taken in policy EC1 in chapter 9 of the Preferred Options document which sets out the overall provision of employment land.

In response to the comments made in the Minority Group Report to housing requirement, Fylde Borough Council has commissioned a new SHMA which identifies that there is a net loss of population in Fylde due to natural change, i.e. the death rate is higher than the birth rate. However, due to inward migration the 5 year and 10 year based trends indicate that the population of Fylde Borough is increasing. The NPPF requires local authorities to take account of migration and demographic change in assessing housing need (paragraph 159). The new SHMA also addresses household formation figures. The Fylde Borough Housing Needs and Demand Study update 2007, carried out on behalf of the Council by Fordham Research, has not been carried forward in the formulation of the Preferred Options document. The provision of Affordable Housing in the Preferred Options document is based

upon the Fylde Housing Needs Assessment 2012. The new SHMA also provides an additional assessment of the need for affordable dwellings. The NPPF requires local authorities to take account of migration and demographic change in assessing housing need (paragraph 159). In searching for potential residential development sites for inclusion within the Preferred Options document, the Council has prioritised the re-development of previously developed land. However, it is recognised that the fully assessed housing need will not be able to be accommodated within the previously developed sites that are available within Fylde and so additional greenfield land will need to be allocated. The updated SHMA utilises a base date of 2011, which is in alignment with the start of the local plan period. Accordingly, it is proposed that the next version of the Local Plan (Part 1) will be based upon a locally derived housing figure, which will not need to include provision for under-performance in previous years. The updated SHMA takes account of the household formation rates for Fylde which, in turn, are based upon an analysis of the age structure of the borough. The modelling of future need is considered to be appropriate and in line with national guidance.

Five Year Supply

The new housing requirement figure will not include a buffer. The buffer does not actually increase the total amount of housing which must be provided i.e. the housing requirement. It simply increases the amount of housing that should be provided earlier in the plan period to make up for a previous backlog. There will be no backlog because of the use of up-to-date data to derive a new figure which will be used from the beginning of the plan period.

The Council acknowledges persistent under-delivery of housing in Fylde and that a 20% buffer is currently required for the purposes of calculating a five year supply. The NPPF paragraph 47 is clear that the 20% buffer does not increase the borough's housing requirement, but moves forward development from later in the plan. The Council has published an updated five year supply statement on its website which has a base date of 31st December 2013.

In response to the claim about banking permissions, the Council has no control as a Local Planning Authority over the banking of planning permissions. However, the Housing Requirement Paper explores the relationship between the supply of land allocated / with permission and completions.

Comments relating Green Belt review at Blackpool International Airport are dealt with under chapter 5.

Comments relating specifically to commercial development at Blackpool International Airport are dealt with under policy T2 in chapter 12.

The Council agrees to add a further criterion to policy SD1 to deal with impacts on airport safety, hazardous areas and pipelines.

Plan Period

CPRE - Fylde District commented on the plan period, suggesting reference to a 20-year period is inconsistent and leads to misleading comparison with the ONS 2011 projections.

A number of residential developers also questioned the plan period and that it should be explicitly set out from the outset, the title of the plan should be altered to reflect this. The Council agrees that the plan period could cause confusion and agrees to amend it to reflect the 19 whole year period from 1st April 2011 to 31st March 2030. The Plan Period will be set out more explicitly in chapter 1 at the start of the document and reference will be made to a 19 year period throughout the plan.

Economic Viability

The viability study was carried out on the Preferred Options document, so as to check if the plan was deliverable; if there are fundamental changes to the Local Plan (Part 1) the Council will undertake a revised Preferred Options consultation.

Deliverability

The Local Plan sets out development in the borough up to 2030. Larger schemes such as Queensway are not expected to complete until after the end of the plan period. Therefore, the number of dwellings identified for Queensway in the Preferred Options document are those dwellings deliverable in the plan period only.

The Home Builders Federation and some residential developers questioned the deliverability of the Local Plan (Part 1), with a reliance on a small number of larger strategic sites, with the failure of one or more sites compromising the plan. A significant element of flexibility should be built into the plan.

Employment Requirement

Comments in relation to the over-supply of employment land and inclusion of land at Lancashire Enterprise Zone, BAE Systems, Warton, within the borough's employment land requirement are dealt with in chapter 9.

Heritage

The Council agrees to include reference to the impact of development on the historic environment in paragraph 6.3 of the Preferred Options document. Comments in reference to identifying inappropriate land for development and an assessment of character are dealt with in chapter 14.

Previously Developed Land (Brownfield)

The Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance (2007) states that the SHLAA should identify as many sites with housing potential in and around as many settlements as possible. As a minimum, it should aim to identify sufficient specific sites for at least the first 10 years. Where it is not possible to identify specific sites, it should provide the evidence base to support judgement around whether broad locations should be identified. The borough's latest SHLAA (2012) has identified sites in and around settlements for over 21,000 dwellings, far in excess of 15+ year supply, therefore, the Council does not need to identify broad development locations. The Council continues to accept new sites for future SHLAA assessments and encourages BAE Systems Real Estate Solutions to identify specific sites for consideration.

Many residents suggested brownfield land should be given development priority over green field sites. The Council's response to comments in relation to brownfield land should have priority over greenfield sites is provided under policy GD1 in chapter 8.

Text in paragraph 6.2 says: "the Strategic Housing Land Availability Assessment 2012 update (SHLAA) indicates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the edge of existing settlements". The NPPF does not require the development of previously developed land (brownfield) first. There are no longer sub-regional previously developed land (brownfield) targets.

Part 4 of Objective 1, in chapter 4 says: A sustainable approach to housing will be taken. This will: "make the best use of previously developed land and buildings, subject to appropriate site investigation and remediation where required, to reduce the loss of greenfield land".

Policy GD1, in chapter 8 encourages the efficient use of land, prioritises development within settlement boundaries and previously developed land, subject to other relevant Local Plan policies being satisfied.

NPPF guidance says Local Planning Authorities may continue to consider setting locally appropriate brownfield land targets. The Council has questioned the need for a previously developed land target. The Borough has very low levels of previously developed land. Previously developed land which has come forward historically are generally windfall sites.

Green Belt

Comments in reference to Green Belt review are provided in chapter 5. As specified in chapter 5, the Council considers that there is no need to review the Green Belt boundaries, or to release land from the Green Belt for development for the whole of the Local Plan (Part 1) period (to the year 2030).

Further Site Suggestions

Further site suggestions proposed by developers, landowners and residents are dealt with in appendix 2.

Key Service Centres

The Council considers that Fylde-Blackpool Periphery will become a local centre by the end of the plan period.

Warton is going to become a Local Centre (settlement hierarchy) over the life time of the local plan, as recognised in the Spatial Vision, as set out in chapter 3. The economic growth generated by the activity at the Enterprise Zone will result in a resurgent housing market, together with the development of a vibrant Village Centre (retail hierarchy) in Warton.

Windfall and small sites allowance

The windfall and small sites allowance accounts for 31% of the boroughs housing requirement. At the base date of the Preferred Options trajectory, 39% of the allowances are existing commitments, 37% are a small site allowance to be allocated in the Local Plan Part 2 and 24% are a windfall.

The Council considers that the fabric of the borough suggests that there is potential for windfalls moving forward. In support of this, the Council is developing a background paper to validate windfall allowance inclusion in the annual housing supply. The background paper will address the issues and concerns identified at the Preferred Options consultation.

Rural settlements

Comments in relation to sustainable rural settlements making up a greater proportion of the boroughs housing requirement is addressed in chapter 10.

Broad Distribution of Development to 2030 Table

An updated housing trajectory will be produced for the next version of the Local Plan, which will resolve the omission between the distribution table and housing trajectory.

The Council does not propose to determine the distribution of small sites until the Part 2 Local Plan. It is important to note that the small sites are not a rural allocation, small sites may also be found within the strategic locations.

Planning applications

While we encourage developers to take schemes forward through a plan led approach, the Local Planning Authority has to continue to determine planning applications while the emerging Local Plan is being developed. The Council cannot stop determining planning applications until the emerging Local Plan is finalised and adopted, therefore development schemes may be approved or refused in Fylde before the adoption of the emerging Local Plan.

Planning law requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

Consultation

The comment in relation to the consultation events is addressed in the summary of consultation.

The Council does not propose to include 'what you said' and 'alternative options considered' in the next version of the Local Plan. These sub-headings were provided in the Preferred Options document for transparency, allowing the reader to see how previous comments have been taken forward and which alternative options were considered and discounted.

Duty to Co-operate

The Council will continue to co-operate on cross boundary issues with neighbouring authorities. Comments in relation to the minerals safeguarding map are addressed in chapter 1 of this report.

Lytham and St Annes

Comments in relation to Lytham and St Annes are addressed in chapter 7, under policy SL1.

Fylde-Blackpool Periphery

Comments in relation to the Fylde-Blackpool Periphery are addressed in chapter 7, under policy SL2. The Members' have decided to rename 'Blackpool Periphery' as "Fylde-Blackpool Periphery" and this new name will be taken forward and be used in the next version of Local Plan (Part 1).

Warton

Comments in relation to Warton are addressed in chapter 7, under policy SL3.

Kirkham and Wesham

The Council does not agree with a residential developer's suggestion that Kirkham and Wesham should be considered as one settlement. Kirkham and Wesham are two separate settlements, which share a common boundary. Local residents have re-iterated this point in previous consultations.

In its draft form, policy M2 of the Lancashire Minerals and Waste Site Allocations and Development Management Development Plan Document identified peat as one of a number of safeguarded minerals, and areas of peat were included in the draft Minerals Safeguarding Area maps. However, during the Examination in Public, the Inspector questioned whether peat was a mineral in light of the publication of the NPPF. Following the publication of the Inspector's report into the Minerals and Waste Local Plan, peat has been removed from the adopted policy and the maps. Consequently, the Minerals and Waste Local Plan no longer refers to peat deposits and peat is no longer safeguarded as a mineral. As a result, the Fylde Local Plan does not need to refer to the requirements of policy M2 in terms of safeguarding peat deposits. Consequently, the Minerals Safeguarding Areas map in chapter 1 will be updated with the removal of peat deposits.

Recommendations for change

- Include the housing requirement within policy in chapter 10.
- Housing requirement and distribution net not gross.
- Clarify percentage of residential development at strategic locations is new development.
- Amend the Plan Period to 19 whole years: 1st April 2011 to 31st March 2030. Plan Period to be clearly stated at the start of the document.
- Amend paragraph 6.3 of the Preferred Options to read “enhance Fylde’s historic, environmental, social and economic assets”.
- Develop a windfall and small sites allowance background paper to tackle issues raised.
- Updated housing trajectory, including rectifying omission between gross distribution table and housing trajectory.
- Percentage of residential development should refer to new residential development.
- Explanation is needed to clarify that Queensway will not be completed within the Plan period.

Policy SD1: The Spatial Development Framework

Number of representations:

Comment	Support	Object	Total
29	5	316	350 ¹⁰

Representations received from:

- Environment Agency
- English Heritage
- Highways Agency
- Home Builders Federation
- Blackpool Council
- Lancashire County Council
- Elswick Parish Council
- Greenhalgh with Thistleton Parish Council

¹⁰ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

- Medlar with Wesham Town Council
- Ribby with Wrea Parish Council
- Treales, Roseacre and Wharles Parish Council
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- BAE Systems Real Estate Solutions
- Kirkham Grammar School
- Warton Typhoons Football Club
- 10 residential developers / landowners
- 302 Residents

What you said

Policy wording

BAE Systems Real Estate Solutions suggest paragraph 1 should include 'contribute towards growth' as well as the continuation and creation of sustainable communities.

Medlar with Wesham Town Council, with one exception, support the Minority Group Report.

Rural and Small Villages

Elswick Parish Council suggested there are significant differences between the villages listed as 'rural villages'. The villages of Singleton, Elswick and Weeton are considerably less sustainable than other villages which are adjacent to larger conurbations.

Ribby with Wrea Parish Council was generally in agreement with the Draft Local Plan, however they raised concerns over the settlement boundaries and Green Belt / Countryside policy being positively and vigorously defended before the emerging Local Plan is adopted.

Residential developers queried whether rural and small villages are included within the strategic locations for development as they appear under the same sub heading.

The Home Builders Federation and residential developers raised concerns over a restriction on residential development in villages until the Part 2 Site Allocations, without a 5 year supply, the Council may find this stance difficult to defend. Reference to "if other material consideration outweigh this policy" should also refer to draft policy NP1, Presumption in favour of sustainable development.

A residential developer sought clarification that the policy refers to "within rural areas development will be restricted to the Rural Villages", however the justification in paragraph 6.28 places the restriction on smaller villages.

A residential developer suggested Little Singleton should be categorised as a rural village as it is larger than Singleton and has the same development potential. A lack of community facilities does not justify Little Singleton's exclusion, Warton is included despite the Council acknowledging a lack of community facilities. Reference to NPPF paragraph 55 and Little Singleton's relationship with Singleton was also used as a justification.

A residential developer sought safeguards to protect and support key communities facilities and services in existing rural settlements while Part 2 of the Local Plan is produced and adopted. The Council should be committed to maintaining sustainable communities by partnership working with all appropriate agencies to prioritise essential funding support for infrastructure where deficiencies or difficulties arise.

A residential developer suggested that the Issues and Options document should refer specifically to the delivery of new homes in the rural areas, the Preferred Option does not make this distinction and is considered to be an omission. The Preferred Option document provides little information on delivering rural new homes, except that it will be provided in Part 2. It could be considered that Windfall and small sites could be allocated within the Strategic locations, which leads to confusion. The distribution table should use the same wording as in policy SD1. A residential developer questioned what non-strategic allocations would occur at the Strategic Locations.

Heritage

English Heritage raised concerns over no reference to the impact of development on the historic environment and opportunities to enhance. English Heritage suggested an assessment should be made to identify land, which would be inappropriate for development because of its historic significance. English Heritage suggested the policy would benefit by making reference to landscape setting and not just settlement 'scale and character'.

English Heritage suggested the justification to policy SD1 would benefit from specific reference to the historic environment and local character with regards to development locations. The Plan should be expanded to include reference to the historic environment in considering the impact of strategic development locations.

Flooding

Lancashire County Council, as a lead local flood authority, stated that support for strategic sites H1, H2, H3 and H7 is dependent on the sites meeting the relevant tests set out in NPPF technical guidance. The allocations appear to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3.

The Environment Agency recommended an amendment to the policy to read 'Inappropriate development will not be permitted in Flood Risk Zones 2 or 3'. This will ensure development that is appropriate in Flood Risk Zones in accordance with NPPF Technical Guidance will not be prevented.

A residential developer opposed reference to 'no development being permitted within Flood Risk Zones 2 and 3', arguing that some development is suitable in Flood Risk Zones 2 and 3 and the Sequential and Exceptions Test in NPPF Technical Guidance should be used to determine the appropriateness of each individual development and its location in regards to flood risk issues.

Residents questioned why no development was proposed for Freckleton due to Flood Risk but development at Warton would be at risk from flooding.

Infrastructure

The Highways Agency is generally supportive of focusing new development towards larger settlements and supports the defined strategic locations for development as the main focus for growth. The Highways Agency recognised high car ownership in Fylde, reflecting personal transport in rural areas. The Highways Agency therefore welcomed smaller settlements providing the focus for small scale development. Whilst the Highways Agency supports the aspiration for economic growth, it does so on the basis that the implications of economic growth have been adequately considered.

Evidence base

Residential developers suggested the evidence base is out of date, this should have been dealt with before the Council's Preferred Options were established. Residents also suggested this and a review of the allocations may be required.

Housing Delivery

An inconsistency in the figure in years 1 - 6 in the distribution table and the trajectory in appendix 2 was mentioned for Warton by a residential developer.

A residential developer referred to the need to deliver the housing deficit over 5 years rather than the remainder of the plan period to 'significantly boost' housing supply. Reference to the need for a 20% buffer was also mentioned.

A residential developer suggested the delivery rates for individual sites were too high.

A residential developer questioned the inclusion of a windfall allowance.

A residential developer raised concerns over the deliverability of the strategic site allocations considering only four of the schemes have permission, and many are yet to submit reserved matters or discharge conditions. This raises uncertainty over the delivery of the strategic sites in the short term.

Housing, employment and leisure requirement

CPRE – Fylde District suggested the strategic locations for development meet the perceived housing and employment land requirements which is overstated. If the base figures were reduced, the number and/or size of the proposed sites could be reduced, saving valuable greenfield and open countryside.

The CPRE – Fylde District suggested that using ONS 2011 projections, disregarding the Regional Spatial Strategy deficit and using realistic achievable build rates, the overall number of new homes required in the plan would be substantially lower.

The CPRE – Fylde District suggested taking any of the six normal statistical measures from the Employment Land and Premises Study, rather than projecting the past trend of allowing greenfield sites for employment.

Lytham and St Annes

Blackpool Council are surprised that no new employment land is being proposed at Lytham St Annes considered the scale of the proposed new housing.

Fylde-Blackpool Periphery

Blackpool Council suggested the reference to Norcross in the Blackpool Periphery is misleading as no strategic development is being proposed at Norcross.

Residents questioned the "Blackpool Periphery" name, suggesting "North West Westby with Plumpton" as an alternative.

Some residents suggested Option 5, which focuses development to the Fylde-Blackpool Periphery, was the most popular option put forward at the previous consultation. The Council should not use infrastructure to justify a lower figure compared to Issues and Options. The Council should not be allocating sites based on existing infrastructure. Infrastructure issues should be resolved by the relevant infrastructure provider.

Warton

Many residents suggested Warton should not be a Strategic Location for Development:

- Warton is not a sustainable site for further large scale development;
- Infrastructure insufficient for housing development and new secondary school;

- Housing demand will not increase due to employment at new Enterprise Zone;
- Too many houses for sale / depreciation of current house prices;
- Development of Warton and facilities would have a negative impact on existing retail centres at Kirkham and Freckleton which currently serve the surrounding area as Service Centres;
- Unresolved surface water drainage problems / low lying land / flooding;
- Loss of community spirit
- Loss / threat to wildlife;
- Loss of Bridges Playing field
- Development at Warton is unbalanced compared to other settlements

BAE Systems Real Estate Solutions agreed that Warton should be identified as a strategic location for development. They suggested the section should be explicit about its aim for Warton to become a key service centre during the plan period. They also suggested the inclusion of BAE Systems land to the north within the settlement boundary.

There was support from residential developers that Warton is a sustainable location for development.

CPRE – Fylde District suggested Kirkham, Wesham and Warton have already seen significant development in proportion to their size and sustainability. These settlements along with other small rural settlements could take more modest development, preferable within the settlement boundaries through windfall and small allocations over the plan period.

Kirkham and Wesham

A residential developer supported Kirkham as a key service centre.

Kirkham Grammer School supported Kirkham and Wesham as a strategic location for development.

A residential developer supported the identification of the Mill Farm site within Kirkham and Wesham Strategic Location for Development.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested the underlying geology should be considered to avoid future maintenance cost of roads laid over sand and peat.

CPRE – Fylde District suggested Kirkham, Wesham and Warton have already seen significant development in proportion to their size and sustainability. These settlements along with other small rural settlements could take more modest development, preferably within the settlement boundaries through windfall and small allocations over the plan period.

Consultation

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested as the Local Plan will guide future development within Fylde, it is important that it is accepted by our communities and it commands the widest support from Councillors and residents.

A residential developer suggested the grouping of settlements in the Issues and Options document differs from the Preferred Option, which makes it difficult to compare. It would have been beneficial to have included further commentary on the elements chosen from each Issues and Option which has made up the Preferred Option. The amalgamation of the options to a new Preferred Option is acceptable.

CPRE – Fylde District referred to the fact that none of the Options from the Issues and Options paper have been taken forward, which undermines the previous consultation and suggest none of the options were sound. There was clear indications from the respondents that large strategic housing allocations should be directed to the Fylde-Blackpool Periphery and land near M55 junction 4, in addition to Pontins site and Queensway.

Council response

Policy wording

The Council agrees to include 'contribute towards growth' in the 1st paragraph of policy SD1.

Rural and Small Villages

The Council considers it necessary to replace the term "Rural Villages" with "Larger Villages" as both large and small villages are located in 'rural' locations and the term "larger villages" denotes clearly the size and scale of a defined settlement.

The Issues and Options paper included an appendix (Appendix 1) which looked at settlement hierarchy, population and accessibility score. The Council will, however, consider refining the settlement hierarchy for settlements outside the strategic locations as it develops the next version of the Local Plan based upon the settlement's sustainability.

The Council is fully aware of paragraph 55 of the NPPF which says: "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby".

The Council agrees with the comments made by Ribby with Wrea Parish Council over the concerns raised over the settlement boundaries and Green Belt / Countryside policy being positively and vigorously defended and that the robust wording proposed in policy SD1 will be taken forward in the next version of the Local Plan and beyond to adoption.

Rural and Small villages are not included within the strategic locations for development. In regards to like-for-like replacement, the policy should have referred to small villages as described in the justification in paragraph 6.28. The two omissions will be resolved in the next version of the Local Plan.

In answer to the Home Builders Federation and residential developers concerns over a restriction on residential development in villages until the Part 2 Site Allocations, without a 5 year supply, the Council agrees to change the policy so that development outside strategic development locations will be resisted until Part 2 unless there are other material considerations e.g. 5 year supply.

The Council is committed to maintaining sustainable communities by partnership working with all appropriate agencies.

Windfall and small sites are not a rural allowance, windfalls could occur and small sites could be allocated within the strategic locations for development, this will be clarified in the next version of the Local Plan.

Heritage

The Council agrees to include reference to landscape setting in the 2nd paragraph of policy SD1.

Comments in relation to impact of development on the historic environment and opportunities to enhance, identifying inappropriate land for development, and reference to historic environment in considering the impact of strategic development locations are dealt with in chapters 7 and 14.

Flooding

The Council agrees with the Environment Agency's recommended wording which also resolves the residential developer concerns.

The Council is aware that some of the proposed strategic sites contain land within Flood Risk Zones 2 and 3. The Council expects this part of the strategic sites to be used for appropriate forms of development, such as landscaping and sustainable drainage systems (SuDS). The next iteration of the document will make specific reference to this.

Comments in relation to no development proposed at Freckleton due to flooding but development proposed at Warton which has flooding are dealt within in chapter 13.

Infrastructure

The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the Local Plan and the preparation of the Infrastructure Delivery Plan.

Evidence

The next version of the Local Plan will reflect the latest evidence base. A revised Preferred Options document will be produced if significant amendments are made by the Council.

Housing Delivery

Comments in relation to conflicting numbers in the housing trajectory and broad distribution table; meeting housing deficit within 5 years; inclusion of 20% buffer; and justification for windfall allowance are dealt with under chapter 7.

The site delivery rates used within the Preferred Options are taken from the Strategic Housing Land Availability Assessment methodology (SHLAA). The SHLAA was produced with assistance of a steering group which included two local housing developers and a private sector planning consultancy. The Steering Group established the delivery rate based on local knowledge of the Fylde. The Council does not have any evidence to contradict the delivery rate established.

Housing, employment and leisure requirement

Comments in relation to the Housing requirement are dealt with under the first part of chapter 6 above.

Comments in relation to the employment land requirement are dealt with under chapter 9.

Comments in relation to the proposed leisure allocation at Mill Farm (i.e. Site E4 – Land West of Fleetwood Road, Wesham) are dealt with under policy SL4 in chapter 7.

Lytham and St Annes; Fylde-Blackpool Periphery; Warton; Kirkham and Wesham

Comments in relation to Lytham and St Annes, Fylde-Blackpool Periphery, Warton and Kirkham and Wesham are dealt with in chapter 7.

The Members have agreed to rename the Blackpool Periphery Strategic Location for Development as the Fylde-Blackpool Periphery Strategic Location for Development.

Consultation

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors comment in relation to the plan receiving the widest support from Councillors and residents is noted.

The groupings of settlements in the Preferred Options document differs from the Issues and Options stage to reflect previous consultation comments.

The five spatial options were:

Option 1: Focus on Lytham and St Annes

Option 2: Equal focus on Lytham and St Annes and Kirkham

Option 3: Lytham and St Annes and Key and Local Service Centres

Option 4: Lytham and St Annes and Rural Dispersal

Option 5: Equal focus on Lytham and St Annes and land on the SE edge of Blackpool

It was concluded in the Consultation Statement to the Issues and Options consultation that the preferred spatial option was likely to be an amalgamation of some of the aspects of all five alternative options and a suggested sixth option. It was accepted that development should be distributed throughout the Borough, adjacent to the main settlements, in order that they could benefit from a supply of new housing and investment in the town centres, services and infrastructure. It was accepted that allowance would be made for smaller sites adjacent to lower tier settlements, small sites within strategic locations and within lower tier settlements and that these would be allocated in the Local Plan Part 2: Site Allocations to 2030. When producing the preferred spatial option the Council has to take into account the results of the Sustainability Appraisal, the responses to the Issues and Options consultation, national policy such as the NPPF and any new national and local evidence.

Recommendations for change

- Amend first paragraph of policy SD1 to include "... will contribute towards growth, the continuation and creation of sustainable communities ..."
- Amend second paragraph of policy SD1 to include "... that is appropriate to the landscape setting, scale and character of settlements at each level of the development framework".
- Replace the term "Rural Villages" with "Larger Villages".
- Amend the sub-headings to resolve the omission of "Larger" and Small Villages being shown under the 'Strategic Location for Development' sub-heading in policy SD1 and re-order the paragraphs set out after the reference to "Small Villages" as the text is confusing and requires clarification.
- Amend policy SD1 to refer to 'Like-for-like redevelopment' in small villages and not rural villages.
- Clarify windfall and small sites definitions and that windfalls and small sites could occur / be found within the strategic locations in addition to the rural area. Allowance to be made for smaller sites adjacent to lower tier settlements, small sites within strategic locations and within lower tier settlements and that these will be allocated in the Local Plan Part 2: Site Allocations to 2030.
- Reference to be made to appropriate forms of development, such as landscaping, where a strategic site contains land within Flood Risk Zone 2 and 3.

- Amend policy SD1 to read “Inappropriate development in Flood Risk Zone 2 or 3 should be avoided”
- Amend policy SD1 so that areas outside strategic development locations will be resisted until local plan part 2, unless other material considerations e.g. 5 year supply.
- Add a criterion to policy SD1 referring to airport safety, hazardous areas and pipelines.

Chapter 7: Strategic Locations for Development

Chapter 7 General Comments:

Number of representations:

Comment	Support	Object	Total
12	5	188	205 ¹¹

Representations received from:

- Environment Agency
- English Heritage
- Lancashire County Council
- Lancashire Wildlife Trust
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Councillor Nulty
- Greenhalgh with Thistleton Parish Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 174 Residents
- 1 Action Group
- 8 Residential Developers

What you said

Further suggested sites

A developer suggested two sites at Clifton for residential development.

Nature Conservation / Biodiversity Designations

The Lancashire Wildlife Trust claimed that a number of the strategic locations adjoin Biological Heritage Sites or contain ponds of biodiversity - protection and enhancement will be key issues if these sites are brought forward for development. Site H5 is also adjacent to a Site of Special Scientific Interest and a Local Nature Reserve.

Previously Developed Land (Brownfield)

A resident suggested brownfield (previously developed land) or surplus employment land should be used for development. Another resident suggested the Strategic Housing Land Availability Assessment (SHLAA) was unsound as it failed to recognise the significant amount of ex-employment brownfield land becoming available.

School provision

Lancashire County Council suggested, based on the level of growth identified, the strategic sites could bring forward the need for five and a half additional primary forms of entry and approximately 600 secondary school places over the three phases. There may be a potential requirement for additional primary sites and an additional secondary school site

¹¹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

depending on position and feasibility of expansion of existing schools at the time of delivery of these developments. The inclusion of an additional secondary school in the plan is therefore welcomed, the need is based on the cumulative impact of the growth rather than impact on one settlement.

Employment Allocations over the plan period

Treales, Roseacre and Wharles Parish Council commented on the inconsistent reference in the Strategic Locations for Development policy tables regarding 'employment over plan period', e.g. there is no employment provision in policy SL1 and policy SL3, and no reference for site H5 on the table in policy SL2 and sites H7 and H13 on the table in policy SL4.

Housing need – affordable and market housing

Cllr Nulty suggested that there is little need for affordable /social housing in Kirkham and Wesham, and that the policy should be amended so that such housing is only provided where there is the need.

A resident suggested that existing new development is struggling to sell which demonstrates that there is no need and that further housing will affect existing property values.

Site selection

A residential developer questioned the methodology/ site selection process which should be re-assessed. They also suggested there should be an assessment of allocations within larger rural areas.

Deliverability

Residential developers questioned the deliverability of the strategic sites as some are dependent on major infrastructure provision. Some residential developers were concerned over the limited number of strategic locations and sites, making the strategy highly uncertain in relation to the non-delivery of one or more sites. They suggested the strategy is heavily reliant on some sites being delivered in the first 6 years and the capacity of the housing market to absorb the level of growth at Warton was questioned.

Some residential developers suggested the Plan does not contain a contingency or policy mechanism if a strategic site fails to come forward, or delivers fewer houses than estimated.

A residential developer objected to the distribution of housing, suggesting it did not comply with the objective of ensuring that new homes are located in the most sustainable location(s). A higher number of houses should be identified at Kirkham and Wesham as opposed to Warton.

Site phasing

A residential developer supported the Council identifying constraints in chapter 7 which would affect the delivery of each strategic site. However, they objected to the constraints being used as a reason for applying a phasing approach. The residential developer claimed that the NPPF does not support a phasing approach and phasing could restrict supply.

Housing requirement

Greenhalgh with Thistleton Parish Council and many residents suggested that the housing requirement is flawed. They suggested the housing backlog should not be included in the requirement, the full potential of Whyndyke Farm will be met by 2030 and usual levels of windfalls and small sites met.

Build-out rates

CPRE Fylde District commented that the build-out rates appear to be taken from the SHLAA, which was established from the advice of house builders in 2009 during the market downturn. CPRE – Fylde District suggested build-out rates evidence should be provided and this should reflect anticipated market conditions over the whole Plan Period.

The Minority Group Report argued that planning permissions granted constitute a 5 year supply, the current 5 year supply has an over reliance on “build-out” rate and encouraged banking or permissions. Residents also agreed with the Minority Group Report in this aspect.

Cllr Nulty suggested the housing requirement is flawed and believed there are sufficient planning permissions in the pipeline to satisfy the 5 year supply. There was support for Whyndyke Farm and Whitehills.

A resident and Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors suggested death rates exceed birth rates in Fylde, therefore we need fewer houses not more. It was also suggested the fragmentation of households is not as great as shown.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors referred to vacant dwellings and the number of dwellings available for sale and rent which demonstrated there is currently sufficient supply to meet need.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested that the population has remained static, key employers have declined in Fylde, which makes the area far less attractive for future employers moving into the area, therefore reducing economic migration taking place.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested too much housing will detract from why people move to Fylde.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors suggested the housing number(s) which the plan is based on is not accurate, transparent or objective.

Some residents suggested that they should be allowed an opinion on the amount of land being proposed to accommodate those families wishing to migrate to this area.

A resident suggested the Fordhams Report overstated and inflated real housing need.

An action group objected to the Preferred Options proposed allocations being based on the revoked Regional Strategy rather than on objectively assessed need using latest evidence. Reference was made to the Minority Group Report.

A resident asked whether existing outstanding planning permissions have been included. The number of dwellings to be completed during the plan period at Queensway and Whyndyke Farm differ from the approved application(s).

Flooding

A resident commented that some strategic sites are located in Flood Risk Zones 2 and 3. Sites on the mossland are affected by springs and also act as a sponge for run-off; land at Cypress Point and Queensway are unstable; excess water from Whyndyke Farm, Blackpool Road and Whitehills will enter Main Drain.

The Environment Agency also raised concerns that some sites are located in Flood Risk Zones 2 and 3 and that there is insufficient information to demonstrate that the sequential

test has been satisfied, and where necessary the exception test has been satisfied. It is not clear if land within Flood Risk Zones 2 and 3 is included in the developable site area. The Agency suggested level 1 Strategic Flood Risk Assessment may need to be expanded and level 2 may be needed. They suggested parts of the sites in Flood Risk Zone 3 that are not for development could be identified in yellow on the Maps of Strategic Locations, this has been undertaken for Queensway.

Heritage

English Heritage suggested the strategic site justifications fail to refer to the historic environment, including designated and non-designated assets, and local character and context. Where the site is located within peat safeguarding areas, the impact on archaeology should be considered. The plan should be expanded to deal with these matters and the potential impacts upon those elements which contribute towards the significance of the heritage assets in the vicinity. If there are likely harmful impacts upon the significance of those assets, the plan should set out the measures to mitigate the impacts. Considerations should be given to opportunities to enhance or better reveal the significance of any heritage assets. If it is not possible to reduce the harm, an assessment should be carried out against paragraph 132 or 133 of the NPPF.

Lytham and St Annes

A resident suggested the secondary school should be built in closer proximity to the catchment in Lytham or St Annes to avoid traffic journeys to Warton. It was also suggested that existing schools could be expanded.

Newton with Clifton Parish Council reconfirmed its preference for option 5 from the Issues and Options paper as its preferred development option, focusing development equally on Lytham St Annes and Land on the south east edge of Blackpool.

Fylde-Blackpool Periphery

Newton with Clifton Parish Council reconfirmed its preference for option 5 from the Issues and Options paper as its preferred development option, focusing development equally on Lytham St Annes and Land on the South East edge of Blackpool.

There was support from many residents for development at Whyndyke Farm, the lower number identified in the Local Plan compared to the pending planning application was questioned.

A residential developer suggested Whyndyke Farm is not sustainable and has little connection with towns in Fylde Borough. The submitted Transport Assessment has not considered any impact on the highways network of Fylde, and associated traffic from committed developments. The proposed figure of 200 dwellings is unrealistic and should be revised to around 500 units due to constraints of: provision of school site and playing fields, adequate buffer and ecological habitat areas, improvements that will arise from the construction of the Preston Western Distributor road and junction 2 of the M55 and reservation of land for the Blue route (the M55 to Norcross Link Road).

Warton

Many residents were against development at Warton due to:

- a lack of infrastructure;
- poor transport access even after the construction of a new junction 2 on the M55;
- flooding/drainage;
- destruction of village identity;
- build-out rates will not provide sufficient time for infrastructure provision;

- disproportionate development;
- increasing the number of residents will not increase service provision which is available at neighbouring service centres;
- The Enterprise Zone will not increase demand for housing.

A resident suggested Warton does have a range of community facilities appropriate to the size of the village, it also has an identifiable and readily accessible centre. In contrast, a resident suggested the existing shopping facilities are inadequate and land should be identified in the plan for new provision.

Some residents suggested additional employment land should be identified in Warton, as the land in the Enterprise Zone is for high end Advanced Engineering and Manufacturing technology.

Some residents suggested that a relief road/bypass for Warton is needed and this should be identified in the Local Plan.

Residents were concerned that developers were submitting planning applications which pre-empted the Local Plan, which would lead to build-out differing from the phasing suggested in the Preferred Options document.

Residents suggested the proposals were in conflict with the Bryning with Warton Parish Plan.

There was support from a residential developer for the inclusion of Warton as a strategic location. The housing number for land to the west of Warton should be a minimum.

Kirkham and Wesham

A resident questioned the inclusion of site H13 (Land North of Mowbreck Lane, Wesham) considering the Council has refused the planning application and a second appeal is (was) pending. The resident suggested that the loss of best and most versatile agricultural land, flooding and potential impact of shale gas exploration / extraction were reasons against Mowbreck Lane.

A residential developer supported the inclusion of site H13, Land North of Mowbreck Lane, Wesham.

Freckleton

A resident suggested Freckleton is more suitable for significant development which would support its role as a substantial Service Centre. A Green Belt review for Freckleton was suggested.

Council response

Further Site Suggestions

Further site suggestions are listed and dealt with in appendix 2.

Environmental Designations

Comments from Lancashire Wildlife Trust are noted and the Council agrees to strengthen the wording of the policies and supporting text in chapter 14 regarding the protection and enhancement of the ecological network and the hierarchy of nature conservation sites.

Previously Developed Land (Brownfield)

Comments regarding the re-use of surplus employment land for residential development and claims that the SHLAA was unsound and did not look at surplus employment land are unfounded as the SHLAA includes a section on 'Potential development on Redundant Employment Sites'.

Comments in relation to brownfield (previously developed land) versus greenfield sites are dealt with in chapter 6.

School provision

Comments from Lancashire County Council regarding primary and secondary school provision are noted. The Council has set up the Fylde Education Liaison Group and is working closely with staff at the Local Education Authority at County Hall, who are evaluating the possible need for an additional secondary school in Fylde, together with potential extensions to the existing primary schools.

Infrastructure

The Council is also liaising with the Public Health, Social Services and Highways Services at County Hall to calculate the level of provision of new doctors' surgeries, dental practices, social service offices and highway improvements required to accommodate all of the growth planned for Fylde over the lifetime of the Local Plan to 2030. The level of infrastructure provision required to deliver the Local Plan will be set out in the updated Infrastructure Delivery Plan.

Employment Allocations

The Preferred Options document did not propose employment or mixed use development at Lytham and St Annes Strategic Location for Development (policy SL1) or at Warton Strategic Location for Development (policy SL3). No employment or mixed use development was proposed at the former Pontins Holiday Centre (site H5) in policy SL2, Land North of Mowbreck Lane (site H13) and Land North of Dowbridge (site H7) in policy SL4. The Council will make the tables in policies SL1 to SL4 (inclusive) clearer so as to resolve any confusion.

Housing need – affordable and market housing

Comments in relation to the need for affordable and market housing are dealt with in chapter 10.

Site selection

Appendix 2 of the Local Plan provides a strategic site assessment of sites considered. The Council will develop a background paper which sets out more clearly the process of site assessment.

The Council will set out the location of smaller site allocations in the Part 2 of the Local Plan, which will include assessments of sites within the rural areas.

Deliverability

The Council is confident that the Local Plan (Part 1) is robust and that the allocated strategic locations for development are deliverable. Therefore, the Local Plan should accord with the test of soundness in terms of deliverability. Consequently, the Council does not propose a Plan B approach. The Publication version of the Local Plan will be prepared for comments on the soundness of the plan, prior to submission to the Secretary of State for an Examination in Public.

The NPPF encourages Local Authorities to boost significantly the supply of housing. The majority of sites phased for commencement within the first 6 years have an approved planning permission.

Market saturation

In response to a resident's suggestion that existing new development is struggling to sell, which demonstrates that there is no need for further housing, the Council considers that there is no evidence that existing new development is struggling to sell. When this is the case developers do not build. A small number of proposed developments in St Annes did stall at the beginning of the recession, they have now been completed. New developments in Warton are being completed and are selling well. The NPPF contains twelve core planning principles the third one states that the planning system should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. That is the Local Planning Authority cannot use the recession as a reason for not meeting its objectively assessed needs for development.

Site phasing

While the NPPF is silent on site phasing, it does not say that phasing should not occur and the Council has included a site phasing approach. The Council will be reviewing the policy wording regarding site phasing and it will consider the comments in relation to infrastructure constraint as a reason for applying a phasing approach.

Housing requirement

Comments in relation to the housing requirement are all dealt with in chapter 6.

Five Year supply

In response to Cllr Nulty's suggestion that the housing requirement is flawed and there are sufficient planning permissions in the pipeline to satisfy the 5 year supply, the Council has a new SHMA which will be used to derive a new Local Housing Requirement figure. See Response to Housing Requirement in chapter 6. The Council has produced an updated Five Year Housing Requirement Paper which is on the Council's website. It has a base date of 31st December 2013 and shows that the Council does not have a five year supply.

The Strategic Locations policy tables set out the projected housing completions during the plan period. Larger sites such as Queensway are not expected to fully deliver and be completed within the plan period, with completions expected beyond 2030, due to build-out rates and site phasing.

A background paper in support of the housing trajectory will provide evidence on the build-out rates and windfall allowance included in the calculations.

Flooding

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of development, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site's capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole site.

Comments in relation to surface water flooding are dealt with in chapter 13.

Heritage

The Council will develop a background paper which sets out more clearly the process of site assessment, including an evaluation of the impact on the historic environment and potential mitigation.

Lytham and St Annes

The Council is working alongside Lancashire County Council and other providers, in developing an Infrastructure Delivery Plan which sets out the transport, social and green infrastructure provisions required to accommodate all of the growth proposed in the Local Plan. A requirement for a secondary school and its location are currently being explored with the Local Education Authority at County Hall, through the Fylde Education Liaison Group meetings.

Fylde-Blackpool Periphery

The Council notes the comments submitted from Newton with Clifton Parish Council and support from residents for development at Whyndyke Farm.

Comments regarding the sustainability of Whyndyke Farm as a strategic location for development are noted as they endorse the Council's Preferred Options.

Warton

Comments in relation to Warton are dealt with under policy SL3 below.

Kirkham and Wesham

Comments in relation to Kirkham and Wesham are dealt with under policy SL4 below.

Freckleton

The Council has confirmed that there is no requirement for a fundamental review of the current Green Belt boundaries in Fylde for the duration of the Local Plan. Freckleton is constrained by the Green Belt to the north, an area of high flood risk to the east and Warton aerodrome to the south. Freckleton is therefore unable to take further development above infill.

Recommendations for change

- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Expand the justification section to explain why Queensway is identified for lower numbers of dwellings in the plan period than the current planning permission. Queensway is not expected to fully deliver and be completed within the plan period, with completion expected beyond 2030, due to build-out rates and site phasing.
- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate forms of land uses, such as landscaping, infrastructure and Sustainable Drainage Systems (SuDS).
- Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the 'Maps of the Strategic Locations for Development' which accompany policies SL1 to SL4 (inclusive).
- Prepare a background paper, which will include strategic site' assessments and constitute a portfolio of sites.

Policy SL1: Lytham and St Annes Strategic Location for Development

Number of representations:			
Comment	Support	Object	Total
17	1	4	22 ¹²

Representations received from:

- Lancashire County Council
- Blackpool Council
- Treales, Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CPRE) – Fylde District
- Councillor Eastham
- AXA Insurance
- Lytham St Annes Cycle Group
- 3 Residents
- 1 Action Group
- 1 Retail Developer
- 1 Residential Developer
- 1 Mixed use Developer

What you said

Further site suggestions

AXA Insurance agreed that the existing urban area is not able to supply enough sites to satisfy the development needs of Fylde. AXA Insurance is willing to bring forward land in its ownership on the edge of the urban area to deliver more housing.

A residential developer suggested Blackpool Football Club Training Ground should be considered.

A mixed use developer suggested a site at Leach Lane, St Annes. The need to allocate additional housing sites in sustainable locations would justify the removal of the site from the Green Belt.

Affordable Housing

Treales, Roseacre and Wharles Parish Council and CPRE - Fylde District suggested the provision of affordable housing should meet the need in the locality of the development and not the need of the entire borough.

Infrastructure

¹² Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.

There was support from Lytham St Annes Cycle Group for the notion of an improved cycle access between Lytham St Annes and Blackpool. They suggested further cycle routes be provided from the end of the Queensway cycle path long the adopted road which runs between the airport and the cricket ground (and then runs behind the playing fields towards the Squires Gate industrial estate.) This route is on the boundary between Fylde and Blackpool for this reason a joint approach between both local authorities would be required. This would provide an alternative commuting option into the industrial estate from the direction of Lytham St Annes.

Cllr Eastham questioned whether all proposed road schemes should be shown in the Local Plan (Part 1).

Flooding

Lancashire County Council, as a lead local flood authority, commented that several strategic allocations are located within Flood Risk Zone 2 or 3. It is recognised that the Queensway site (site H1) already has approval. However, there is no explanation within the text as to whether the remaining sites meet the sequential and exception tests as outlined in the NPPF Technical guidance. Lancashire County Council claimed its support for strategic sites H1, H7, H2 and H3 is dependent upon the sites meeting the sequential and exception tests. Furthermore, the allocations appear to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3.

An action group suggested Lytham and St Annes is at or near capacity in terms of sewerage and surface water management, this is a threat to the Ribble and Alt Estuary (Special Protection Area, Special Area of Conservation and a Ramsar site) and it is not reflected in the scoping report.

Some residents suggested that flooding is an issue in Lytham and St Annes and current drainage schemes do not work efficiently, this plan would exacerbate the problem.

Mixed use

Blackpool Council suggested there is an opportunity for one of the strategic sites to be identified for mixed use development to support future economic growth at Lytham and St Annes.

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail uses can also provide an important buffer between residential and less sensitive land uses.

Site H1 – Land at Queensway

A resident suggested Queensway housing sales will suffer from close proximity to Blackpool International Airport and shale gas exploration and extraction ('fracking') site(s). CPRE Fylde District questioned the inability to complete on Queensway and Whyndyke Farm by 2030. The applicant and Inspector at the appeal inquiry for Queensway placed priority on delivery. The Planning consultant for Whyndyke Farm stated 1,500 homes can be delivered by 2030. The Local Plan is potentially over estimating the number of sites needed. Where a housing scheme has been defined by a consultant or developer, their own homes delivery evidence should supersede Planning Policy Team estimates.

Site H2 – Land West of North Houses Lane

A residential developer suggested site H2 lends itself to higher density development due to its relationship with the built up area and the Queensway scheme. The developer objected

to the timescale given for the delivery and believed it could be brought forward sooner in the Plan period.

An action group suggested that there is no certainty that sites H2 and H3 could be delivered in the plan period as the timeline for completion of the Moss Road (the M55 to Heyhouses Link Road), which is dependent on the Queensway scheme is questionable. The scoping report was also suggested to have failed to identify Lytham Moss as functionally linked to Ribble and Alt Estuary. The action group suggested the 'in-combination effects' of both the proposals in the Local Plan, shale gas exploration and extraction ('fracking') on the Moss, drainage issues and the current Queensway scheme are all considered.

Site H3 – Land North of Moss Hall Lane

Cllr Eastham suggested site H3 is actually located in Lytham and not St Annes.

A resident suggested the site is unsuitable for housing, it is a haven for wildlife and wildflowers and would exacerbate flooding in surrounding areas. The bridge path which runs along the site is well used and should not be disturbed. There is no current housing demand in the area.

A residential developer suggested site H3 may be more suitable as lower density executive housing to provide a softer edge to the urban boundary. The developer objected to the timescale given for the delivery and believed it could be brought forward sooner in the Plan period.

An action group suggested that there is no certainty that sites H2 and H3 can be delivered in the plan period as the timeline for completion of the Moss Road (the M55 to Heyhouses Link Road), which is dependent on the Queensway scheme is questionable. The scoping report was also suggested to have failed to identify Lytham Moss as functionally linked to the Ribble and Alt Estuary. They suggest the 'in-combination effects' of both the proposals in the Local Plan, shale gas exploration and extraction ('fracking') on the Moss, drainage issues and the current Queensway scheme are considered.

Site H4 – Former EDS Site, Heyhouses Lane

A mixed use developer supported the designation of the former EDS site as a strategic site which reflects the existing mixed-use commitment on approximately 75% of the site. The draft allocation is for residential development, however, the commitments is for a mixed use site. It is understood that the plan should have only identified the existing commitment, retaining the existing employment allocation. The developer wishes to promote the whole site for mixed use development, the site represents an important and rare brownfield resource, located centrally within the main urban area of the borough. The developer refers to paragraph 22 of the NPPF which avoids the long term protection of allocated employment sites. The developer referred to the market demand report and viability study submitted with the planning application which concluded redevelopment for employment is not viable.

Council response

Further Site Suggestions

Further site suggestions submitted by developers, landowners and residents are listed and dealt with in appendix 2.

Affordable Housing

Comments in relation to affordable housing are dealt with in chapter 10.

Infrastructure

The Council is developing an Infrastructure Delivery Plan which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the development proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including flooding, drainage and sewage provision, highways infrastructure, electricity supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

Cycle infrastructure, including new cycle paths, is considered within the Infrastructure Delivery Plan. Lancashire County Council have set out a cycle link improvement into Blackpool from St Annes via Queensway, Midgeland Road and Wildings Lane as a route to support strategic sites in Lytham and St Annes.

In relation to Cllr Eastham's comments, the Council will update the list of strategic highway improvements in Policy T1 in chapter 12, to mirror those identified in the Fylde Coast Highways and Transport Masterplan, when the masterplan is issued for consultation in Autumn 2014.

Flooding

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site's capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Mixed use

Site H4, former EDS Site, Heyhouses Lane is a mixed use development which is incorrectly identified as a housing allocation in policy SL1 and on the Map of Lytham and St Annes Strategic Location on page 52 of the Preferred Options document. This inaccuracy will be corrected in the next version of the Local Plan.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 and SL3 in chapter 7). Comments in relation to mixed use on strategic sites are dealt with under policy GD3 in chapter 8.

Site H1 – Land at Queensway

Comments that the sales forecast will be undermined by Blackpool International Airport and shale gas exploration and extraction ('fracking') are noted.

Site H2 – Land West of North Houses Lane

Comments made by a residential developer suggesting the use of higher densities and phasing the residential developments on sites are noted. Housing densities are dealt with in chapter 10. The Council agrees to prepare a new policy on overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.

The Council is confident that the Local Plan is deliverable and that it accords with all of the tests of soundness. The residents of Fylde will have a chance to comment on whether the Local Plan meets the tests of soundness when the Publication version is issued. The tests

of soundness for the Local Plan are: positively prepared, justified, deliverable, sustainable, impartial and consistent with national planning policy.

Comments regarding the scoping report are dealt with in the Sustainability Appraisal / Strategic Environmental Assessment section of this report.

Site H3 – Land North of Moss Hall Lane

The Council will amend the reference to site H3 at the sub-heading preceding paragraph 7.23, as it is not located in St Annes but in Lytham.

Comments made by a residential developer suggesting a lower density and phasing the residential development on the site is noted. Housing densities are dealt with in chapter 10. The Council agrees to prepare a new policy on overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.

Deliverability

The Council is confident that the plan is robust and that the proposed strategic locations for development are deliverable. Therefore, the Local Plan should accord with the test of soundness in terms of deliverability. The Publication version of the Local Plan (Part 1) will be produced for comments on the soundness of the plan, prior to submission to the Secretary of State for an Examination in Public.

Comments regarding the scoping report are dealt with in the Sustainability Appraisal / Strategic Environmental Assessment section of this report.

The Local Plan Part 1 will set out development in the borough to the year 2030, which will meet current and future housing requirements. The Local Plan includes policies on biodiversity in chapter 14 and flooding in chapter 13. The Local Plan is written to be read as a whole and the Council agrees to add wording in chapter 1 of the next version to emphasise this.

Site H4 – Former EDS Site, Heyhouses Lane

Site H4, former EDS Site, Heyhouses Lane is a mixed use development which is incorrectly identified as a housing allocation in policy SL1 and on the Map of Lytham and St Annes Strategic Location on page 52 of the Preferred Options document. This inaccuracy will be corrected in the next version of the Local Plan. The Council’s intention is to protect existing identified employment allocations, which are not the subject of existing consents for alternative uses. This policy approach is set out in more detail in chapter 9 under policy EC1.

Recommendations for change

- Amend the sub-heading immediately preceding paragraph 7.23 of the Preferred Options to refer to “North of Moss Hall Lane, Lytham (site H3)”.
- Amend site H4 (Former EDS Site, Heyhouses Lane) in policy SL1 and on the Map of Lytham and St Annes Strategic Location, to be shown as a mixed use site.
- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Amend policy SL1 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.

- Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL2 and issue it for consultation alongside the Publication version of the Local Plan.
- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS.
- Identify non developable land, which is in Flood Risk Zones 2 and 3, within the Strategic Location sites on the 'Maps of the Strategic Locations for Development' which accompany policies SL1 to SL4 (inclusive).
- Prepare a background paper, comprising a portfolio of sites, which will include strategic site assessments.
- Add a new policy on the overall provision of housing land, including the phasing of the delivery of housing sites in chapter 10 of the next version of the Local Plan.

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

Number of representations:

Comment	Support	Object	Total
23	170	14	207 ¹³

Representations received from:

- Councillor Sue Ashton
- Councillor Eastham
- Councillor Hardy
- Blackpool Council
- Lancashire County Council
- Lancashire County Council – Property Services
- Elswick Parish Council
- Kirkham Town Council
- Ribby with Wrea Parish Council
- Westby with Plumpton's Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Highways Agency
- Lancashire Wildlife Trust
- Lytham St Annes Civic Society
- Lytham St Annes Cycle Group
- Centrica Plc - Heliport Terminal
- A Residents Action Group
- 169 Residents
- 3 Residential Developers/Landowners
- 1 Mixed use Developer

What you said

¹³ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

Ribby with Wrea and Elswick Parish Councils supported development at Fylde-Blackpool Periphery.

Kirkham Town Council supported development at Fylde-Blackpool Periphery, suggesting it as an alternative to development at Kirkham and Wesham to retain existing settlement identity.

There was support from the Minority Group Report for development adjacent to the Blackpool boundary at Whitehills, Cropper Road and Whyndyke Farm due to high unemployment in Blackpool and good M55 access and services.

There was support from a land owner for the identification of the Fylde-Blackpool Periphery as a future housing and employment location.

Further site suggestions

Further sites suggested at Blackpool Football Club Training Ground and Cropper Road West (including Cropper Garage).

Cllr Sue Ashton suggested Cropper Road West and development up to Jubilee Lane, Westby as an alternative to Whyndyke Farm.

Fylde-Blackpool Periphery name

Westby with Plumpton Parish Council objected to the inclusion of policy SL2, suggesting they are not a suburb of Blackpool, the investment should focus on rejuvenating the existing Blackpool suburbs. The Parish Council is not against improvements to infrastructure, housing and further commercial development but it must be sympathetic.

Cllr Sue Ashton objected to the area being referred as the periphery of Blackpool and the countryside in Westby should be defended against some of the proposals in the Local Plan. A resident suggested the area should be called North West Westby with Plumpton.

Mixed use development

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail can also provide an important buffer between residential and less sensitive land uses.

Infrastructure

The Highways Agency commented that there is the potential for significant additional demand on the M55 as a result of the scale of development proposed. The Agency welcomed the recognition in paragraph 7.34 that potential highway improvements will be considered, the Agency would wish to be involved in considering the evidence so that it can be assured that the outcomes are reasonable, feasible and deliverable.

There was support from Lytham St Annes Cycle Group for the notion of improved cycle access between Lytham St Annes and Blackpool. The Cycle Group suggested further cycle routes be provided from Squires Gate railway station along the rear of the former Pontins site (alongside the railway boundary fence) to emerge further along the A584 in the direction of St Annes. The route could continue along the railway fence in the direction of St Annes through the nature reserve to emerge into Kilgrimol Gardens.

Flooding

Lytham St Annes Civic Society commented that drainage is a key concern in south Fylde and proposals in Whitehill area will make this matter worse.

Site H5 Former Pontins Holiday Centre

Lancashire Wildlife Trust commented that the DEFRA funded Starr Hills Environmental Works Programme has agreed that it is a priority action to establish the likely migration required on the adjoining dune system (Site of Special Scientific Interest / Local Nature Reserve / Biological Heritage Site). Paragraph 118 of NPPF and possibly 119 will be relevant for site H5. Paragraph 119 of the NPPF will be relevant to proposed developments within the Coastal Parkway masterplan.

The Lancashire Wildlife Trust commented in relation to Habitat Regulations Assessments comments on policy SL2, which says policy SL2 could impact on the Ribble and Alt Estuaries Special Protection Area / Ramsar site in relation to site H5, and recommends rewording the policy to address this. The Wildlife Trust suggested that it is unclear if this has already been addressed in the policy.

Site M1 Land East of Cropper Road

A mixed use developer suggested site M1 should be expanded to include a wider area. It is assumed that the existing allocations for proposed and existing employment land are carried forward and this should be considered alongside this current proposed allocation to be dealt with as a whole. There is no reason why the proposed allocation has to work around existing undeveloped sites, rather than adopting a comprehensive solution with a flexible supportive framework.

The mixed use developer, suggested that the mix of uses supported within the strategic site area should also be broadened. This would include a mix of residential uses and traditional employment uses (Class B1, B2 and B8 uses) alongside other employment-generating commercial uses, including retail, hotel, non-residential institutions, assembly and leisure and sui generis commercial uses.

Lancashire County Council Property Group supported the identification of site M1 for mixed use and expect to see flexibility in terms of access, number of dwellings and the type and amount of employment land to ensure the future development is achievable and deliverable.

There was support from residents for identifying residential development in preference to the spread of commercial units at and/around Whitehill Road.

Site M2 Whyndyke Farm

Elswick and Treales, Roseacre and Wharles Parish Councils supported the inclusion of Whyndyke Farm.

Cllr Sue Ashton objected to paragraph 7.40 describing the site currently as mixed use, and highlighting that the description does not refer to the farm and agricultural use. Cllr Sue Ashton suggested the ponds should be used for a nature reserve and the site could be used for tourism. The area has surface and sewer flooding which impacts on the Ribble Estuary. Highway congestion will be caused. The site includes peat which should be retained as a carbon sink. A resident also mentioned flood risk.

CPRE - Fylde District supported the inclusion of Whyndyke Farm. CPRE – Fylde District is aware that some greenfield sites are needed and believe that Whyndyke Farm should be given priority to make a major contribution to housing requirement.

Blackpool Council suggested reference be made in the justification to the sub-regional significance of Whyndyke Farm.

In relation to Whyndyke Farm, an action group suggested that it is environmentally beneficial not to interfere with peat areas which act as a carbon sink. The action group also referred to serious water issues which will need to be resolved before the area is developed.

Lancashire County Council commented that peat safeguarding areas have been amended, Fylde should therefore refer to NPPF for guidance on peat safeguarding rather than the Lancashire Minerals and Waste Local Plan.

Councillor Eastham suggested paragraph 7.31 should be amended to read “further infrastructure for water supply is required”.

A resident referred to issues relating to flood risk and surface water drainage, biological heritage site(s), field ponds and peat safeguarding area(s).

An action group raised issues over wastewater capacity which would have to be resolved to make this development viable. The action group went on to disagree with the statement that the landscape is currently poor and redevelopment may be beneficial. They claimed that this was an inaccurate description of Whyndyke Farm which they consider has a beautiful mix of cultivated fields and grazing and fallow land. They claimed that the loss of the land to mixed use development would be visually over-bearing. The site could encourage creeping development, potentially linking the area to Lytham St Annes. Existing residents would be disturbed during construction. The local road network would be overloaded, Mythop Road is not designed for more vehicles and there would be a potential impact from air pollution.

A residential developer supported the inclusion of Whyndyke Farm for mixed use. It was suggested if the scheme is approved shortly, construction could start much earlier than the estimated year of 2020, and could deliver closer to 1000 dwellings in total.

The Minority Group Report commented that after discussions with the landowner of site M2, the site could deliver 100 houses a year and up to 1,500 within the plan period. The scheme would also deliver infrastructure, services and facilities on site, be sustainable and assist with the “Duty to Co-operate”.

A resident suggested Whyndyke Farm is East of A583 and not West as referred to in paragraph 7.40. The A583 provides a clear boundary between urban sprawl of Blackpool and Fylde’s countryside.

Many residents and the Minority Group Report supported site M2 and suggested that this should replace sites identified under policy SL4 (Kirkham and Wesham Strategic Location for Development). It was also suggested that site M2 could fully deliver and be completed within the plan period and could meet the housing and employment needs of Blackpool.

Site E2 Land at Blackpool International Airport

Lancashire County Council commented that policies SL2 and EC1 identify 5ha of employment land at Blackpool International Airport for B1a uses. Identification of land for development at the airport to achieve value is supported, however further consideration should be given to a broader mix of uses as enabling development.

Blackpool International Airport noted the emerging Local Plan includes policies SL2 and EC1, which identify 5ha of land (site E2) as a strategic location for development. Blackpool International Airport are seeking a policy framework which:

- Establishes the Council's ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;

- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Heliport Terminal objected to the proposed allocation, in particular the inclusion of the Heliport within this allocation. Heliport also requested that further development at or around the Airport does not restrict its operations, including interference with communication, navigation or radar equipment.

Lytham St Annes Civic Society commented that drainage is a key concern in south Fylde and proposals in the Whitehills area will make this matter worse.

Council response

Comments from the Parish and Town Councils, the Minority Group Report and from a landowner for the identification of the Fylde-Blackpool Periphery as a future housing and employment location are noted.

Further Site Suggestions

Further site suggestions are listed and dealt with in appendix 2.

Fylde-Blackpool Periphery name

Comments regarding the name of Fylde-Blackpool Periphery are covered in chapter 2: Spatial Portrait of Fylde.

The Council notes the comments of the Westby with Plumpton Parish Council and Cllr Sue Ashton regarding Fylde-Blackpool Periphery.

Mixed use development

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites. Comments in relation to mixed use development on strategic sites are dealt with under policy GD3 in chapter 8.

Infrastructure

The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the preparation of Part 1 of the Local Plan and the Infrastructure Delivery Plan.

The Council is developing an Infrastructure Delivery Plan, which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including flooding, drainage and sewage provision, highways infrastructure, electricity supply and provision of facilities and services. Cycle infrastructure, including new cycle paths, is considered within the Infrastructure Delivery Plan. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

Flooding

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping, infrastructure and SUDS. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site's capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole of the site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Site H5 Former Pontins Holiday Centre

Comments in relation to Starr Hills Environmental Works Programme are noted. Comments regarding the Habitat Regulations Assessment are dealt with in the Sustainability Appraisal / Habitats Regulation Assessment scoping section.

M1 Land East of Cropper Road

Proposals for further site suggestions / expansion of proposed strategic locations are included in appendix 2.

The Council will prepare a Policies Map which will include all of the existing employment allocations to be taken forward in the emerging Local Plan, together with new employment allocations under EC1 policy. This will assist the Council in progressing a comprehensive approach to the Whitehills Area.

The Council notes the position of Lancashire County Council Property Group regarding their land ownership.

The Council notes the residents support for residential development in preference to commercial units at / and around Whitehill Road.

The Council considers that the mix of uses within the strategic site area, on Land East of Cropper Road, should not be broadened.

Site M2 Whyndyke Farm

The Council notes the position of the resident and the Parish and Town Councils and the Minority Group Report.

Comments in relation to peat safeguarding areas and peat acting as a carbon sink are dealt with in chapter 1.

Comments in relation to flood risk and surface water drainage are dealt with in chapter 13.

Comments in relation to landscape quality are dealt with in the Sustainability Appraisal section and in policy ENV1: Landscape in chapter 14. The Council considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, so as to strengthen policy ENV1 and to enhance the evidence base to the Local Plan (Part 1).

The Council agrees to refer to the sub-regional significance of Whyndyke Farm as a strategic site in the justification to policy SL2.

The Council agrees to amend the wording of paragraph 7.31 regarding the water supply to Whyndyke Farm.

The Council will amend the inaccuracy in paragraph 7.40 so that it refers correctly to Whyndyke Farm being situated to the east of Preston New Road (A583).

The Council will also refer to the existing agricultural use of Whyndyke Farm in the site description in paragraph 7.40.

The Council has resolved to reduce the number of houses developed at Warton from 1,160 to around 650 over the plan period; and to bring forward the phasing of housing development at Whyndyke Farm (Site M2) from a projected commencement date of 2020 to a start date of 2015. This will result in Whyndyke Farm being fully delivered and completed within the plan period.

The Council notes the position of the residential developer and the Minority Group Report.

The Council will work with Lancashire County Council and other infrastructure providers as part of the development of the Infrastructure Delivery Plan, to set out the level of infrastructure provision required to deliver the Local Plan. The Infrastructure Delivery Plan will include highways infrastructure and water provision, together with social infrastructure and green infrastructure.

Site E2 Land at Blackpool International Airport

Comments relating to site E2, specifically enabling development at Blackpool International Airport are dealt with under policy EC1 in chapter 9. Comments relating to a review of Green Belt are dealt with under chapter 5. Comments relating to the future policy framework at Blackpool International Airport are dealt with under policy T2 in chapter 12.

The Council will liaise with Blackpool International Airport regarding the proposed allocation at the Heliport Terminal.

The Council will expand policy ENV6 (which is proposed to become policy GD5 in chapter 8 in the next version of the Local Plan), to insert a criteria which prevents new development interfering with the operation of existing land uses.

Policy CL2 in chapter 13 deals with the impact of renewable and low carbon energy generation on the operation of Blackpool International Airport.

Recommendations for change

- The boundaries of all existing employment allocations to be taken forward with new allocations identified in policy EC1 in chapter 9 will be shown on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan.
- Amend policy SL2 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.
- Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL2 and issue it for consultation alongside the Publication version of the Local Plan.
- Expand policy ENV6 of the Preferred Options document, (which is to become policy GD5 in the next version of the Local Plan), to include a criterion which prevents new development impacting on the operation of existing land uses.

- Amend policy SL2 so that the projected commencement date for site M2 – Whyndyke Farm is “2015” and not “2020”.
- Refer to the sub-regional significance of Whyndyke Farm as a strategic site in the justification section to policy SL2.
- Amend paragraph 7.31 of the Preferred Options to read: “Further infrastructure for water supply is required ...”
- Amend paragraph 7.40 of the Preferred Options to read: “This mixed use site is situated to the east of Preston New Road (A583).....”
- Amend paragraph 7.40 of the Preferred Options to read: “... Preston New Road, Peel and is predominantly in agricultural use but also includes a petrol station and static caravan park ...”
- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate forms of development, such as landscaping and infrastructure.
- Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).
- Prepare a background paper comprising a portfolio of sites, which will include strategic site’ assessments.

Policy SL3: Warton Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
23	16	206	245 ¹⁴

Representations received from:

- Councillor Sue Ashton
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Bryning with Warton Parish Council
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- Lancashire County Council
- Lancashire Enterprise Partnership
- Highways Agency
- Sport England
- BAE Systems Real Estate Solutions
- Blackpool, Fylde and Wyre Trades Union Council
- Lytham St. Annes Civic Society

¹⁴ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

- Lytham St Annes Cycle Group
- The Minority Group Report
- Carr Hill High School
- The Boys' Brigade
- 133 Residents
- 7 Residential Developers / Landowners
- A Retail Developer

What you said

Further site suggestions

A residential developer suggested the inclusion of a site adjacent to Church Road and an amendment of the Green Belt boundary at this location which would provide a logical extension to the urban area and a realistic, sensible and long-term Green Belt boundary.

Some residents suggested some of the development should occur at Freckleton, some suggested the area to the north of the bypass as an alternative.

A landowner suggested Great Birchwood Country Park as an alternative secondary school location on a previously developed land (brownfield) site. The response referred to paragraph 69 of the NPPF which suggests appropriate previously developed land (brownfield) development in the Green Belt can be appropriate.

Mixed use development

Blackpool Council suggested there is potential for one of the sites to be used for mixed use development to support future economic growth.

BAE Systems Real Estate Solutions suggested Warton Aerodrome and the Enterprise Zone provide opportunities to build and diversify the local economy. There may be land within the aerodrome which could provide opportunities for retail and community facilities in Warton. There could be opportunities to utilise brownfield land and existing infrastructure on site as part of mixed use redevelopment.

A resident commented that the justifications for inclusion of the sites were generic and could apply to any location, this does not justify inclusion of new homes in Warton.

Residential developers supported the inclusion of Warton as a strategic location. Reference was made to the proposed new junction 2 of the M55 supporting economic growth at Warton.

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. Retail can also provide an important buffer between residential and less sensitive land uses.

Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors objected to the increase in the size / scale of Warton which would have a negative effect on character.

The Minority Group Report objected to the scale of development proposed at Warton and the increase of more than 75%. They suggest the justification is weak and hangs on inaccurate employment land need; expansion at Lancashire Enterprise Zone (Warton) for high technology industries typically produce low volume employment opportunities; and

elevated status from a local to key service centre. The Minority Group Report suggest the development at Warton would conflict with Objective 2 “*retaining the identity, character and setting of the rural villages.*”

Cllr Sue Ashton commented on the highways infrastructure and the lack of a proposal for a new road, commenting that the recent Nine Acre nursery development had impacted on the highway. Cllr Sue Ashton also agreed that new facilities should be provided but did not see how a new centre could be created as the village is ribbon development with a busy road. Cllr Sue Ashton suggested the proposed level of housing is too high.

Many residents objected to the inclusion of sites at Warton for the following reasons:

- loss of agricultural land;
- flooding;
- noise;
- no need for secondary school;
- there is a lack of community facilities in Warton;
- change character forever;
- provision; no demand for housing;
- impact on existing house prices;
- loss of wildlife and habitat;
- primary schools fully subscribed;
- retain existing boundary;
- highways safety;
- traffic congestion
- anti-social behaviour created from higher density development;
- the proposal goes against the recent village plan.
- No longer a village.
- High density / over development
- Visual impact / overlooking / loss of privacy / over shadowing
- Limited public transport
- Change from a village to a town
- Cannot justify development in Warton because there is strong developer interest.

A resident supported the inclusion of Warton for development, they suggested residential development should include:

- an industrial area for small local business;
- Cycle ways
- Allotments
- Play areas for children
- Landscaping
- Highways enhancement: one way system around Queensway off Harbour Lane and widen Hillock Lane
- A high school located between Warton and Freckleton with community use.
- Rationalise the under-use of Bridges Playing Fields
- More development would enhance the attractiveness commercially for a supermarket
- Housing for older population

A residential developer objected to the level of development proposed at Warton, suggesting a greater proportion of development should be attributed to Kirkham and Wesham.

Infrastructure

Lancashire County Council commented that there was a need for a significant increase in the levels of infrastructure and service provision. New road infrastructure to the north may

be required from developer funding. A Single Local Growth Fund may be required as the scale of development proposed is unlikely to be sufficient to raise sufficient funds.

Treales, Roseacre and Wharles Parish Council commented that infrastructure improvements needed at Warton may put the Warton Enterprise Zone at a disadvantage compared to Samlesbury. The Parish Council commented that Warton would appear to benefit from a bypass, the route should be explored and protected.

Many residents objected to the expansion of Warton due to infrastructure provision, siting highway congestion and the lack of sewerage provision.

Some residents suggested that the proposed new junction 2 of the M55 would increase traffic movements in Warton.

Lytham St Annes Cycle Group supported a coastal cycle route, with a shared cycle / pedestrian route around the former Land Registry to connect with the A584 via Lytham Quays. This new route would be supported by a new Secondary School in Warton, the Enterprise Zone and would be consistent with the Green Infrastructure Strategy.

A resident commented on road infrastructure and BAE Systems, Warton traffic, suggesting that the new entrance to BAE Systems, Warton and the Enterprise Zone, through the GEC Marconi site, would not alleviate traffic congestion but would create a key congestion area rather than the current layout which diverts traffic via 3 exits.

Lytham St Annes Civic Society commented that no new road infrastructure is proposed in Warton in an area which is already congested during peak times due to the location of BAE Systems, Warton. Warton is also a key route into Lytham from Preston.

Cllr Eastham commented that Warton bypass is needed for the plan to proceed in its current form; and that paragraph 7.73 should be reworded to refer more clearly to infrastructure that will be required. Residents commented that a new bypass is needed, some suggested this should be constructed before further development takes place.

Some residents objected to development at Warton, suggesting it did not follow the aims of policy INF1 to make the most of existing infrastructure, focusing development to sustainable locations with the best infrastructure capacity. Residents claimed that development at Warton contradicted Strategic Objective 1 (To Create Sustainable Communities) in chapter 4, which aims to locate development in sustainable locations so as to minimise private transport and avoid areas at risk of flooding.

The Highways Agency commented that Warton is located a relative distance from the strategic road network, in relation to the potential connectivity to other areas in the Fylde peninsula. There are potential implications on the strategic road network which would need to be fully understood.

The Highways Agency claimed that the overall development of 1,160 dwellings will have an impact on the strategic road network, particularly when combined with the Plan's other development. It is important for the Agency that the impacts are fully understood and supported by necessary transport infrastructure.

The Agency wishes to be fully involved at the earliest opportunity to ensure appropriate consideration is given to the potential impact of the proposed new Preston Western Distributor road and junction 2 on the M55.

A residential developer suggested that the Infrastructure Delivery Plan does not link new residential development with the need for a new M55 Preston Western Distributor link road. The developer claimed that the only reason stated for the link road is to improve access to the Enterprise Zone in Warton. Accordingly, there is no evidence within the Infrastructure Delivery Plan of congestion in Warton which will be alleviated by the new junction to the M55. There is no evidence to indicate a site phasing on highways infrastructure in Warton is needed. The developer claims that work is needed to be undertaken in terms of the impact of junction 2 of the M55 and the requirement for a bypass at Warton before the level of development is restricted.

A resident raised concerns over highways infrastructure, claiming that the proposed Preston Western Distributor Road is irrelevant, traffic impact is connected to the entrance to the employment site causing problems. An increase in resident numbers would exacerbate this and present a potential accident risk.

Secondary school

Bryning with Warton Parish Council suggested the grounds and evidence to support the need for a Secondary School within the Parish was not justified or likely to be required in the future, well beyond 2030. There is a potential future demand in Lytham and St Annes and the Plan should identify a suitable site within these settlements. The Parish claimed that the school location in Warton would be beyond a walking or cycle distance, creating extra vehicular traffic and peak hour congestion.

Cllr Sue Ashton supported the need for a new school, but suggested this should be located on site H10 (Land east of Warton) to serve Warton and Freckleton residents who may walk and cycle, reducing the number of car journeys. Lytham St Annes High School has already been extended to the limits and is in danger of losing its character. The new school could be used for community facilities and learning.

The need for a secondary school was questioned by residents, some residents suggested it should be provided closer to its main catchment of Lytham and St Annes. Residents were also concerned how a school in this location would impact on highways safety and traffic congestion.

Blackpool, Fylde and Wyre Trade Unions Council commented that care is needed to ensure that any new school is constructed and opens in time to match population growth. The Trade Unions Council claims that any new school should be under democratic control and not be an academy or free school.

Carr Hill High School commented that there is no need for a secondary school and provision of a new school would impact on existing schools. Carr Hill faces financial difficulties as a result of prolonged decline in the number of 11 year olds which would be resolved if children from Warton development are directed to Carr Hill. Capital investment in a new school would be better invested in existing school facilities and infrastructure.

A resident supported the provision of a secondary school which could share facilities with the community.

Community Facilities

Sport England objected to the reference in paragraph 7.49 to the possibility of relocating a swimming pool for Kirkham to Warton. Sport England questioned the strategic rationale for this. Sport England has the Facilities Planning Model which could be used to scenario test the feasibility of making such a decision. As a Built Facilities Strategy should be one of the Needs Assessments that underpins policy required by paragraph 73 of the NPPF, pool scenario testing should be carried out as part of that work.

Flooding

Bryning with Warton Parish Council commented that the Local Plan identifies suitable areas for development, despite acknowledging in chapter 13 the low level coastal area is susceptible to sea level rise and increasing river and surface water flooding. The Parish Council claims that the current drainage and sewer system cannot cope with the existing settlement requirements. The proposed allocations are surrounded by tidal drainage ditches. These concerns have been raised with developers and relevant authorities but disregarded as drainage and sewerage is not taken into account for planning applications and figures suggest existing provision should cope. The Parish Council claims that the Strategic Flood Risk Assessment is inaccurate as it does not identify Warton. The Parish Council claims that flooding, wastewater and surface water run-off issues should all be resolved before further development is considered or permitted in Warton.

Enterprise Zone

Lancashire Enterprise Partnership suggested that the strategic importance of the Enterprise Zone at Warton needs to be positioned in the plan, this should include developing a policy for the site as a strategic location. The role of the Enterprise Zone in relation to the City Deal should be referenced, this should include placing a greater emphasis on the role of the City Deal and its potential to significantly improve the economic and physical connectivity of key employment and housing sites. This would strengthen working with other councils and linkages to the City of Preston.

Lancashire County Council supported the planned growth in Warton and its complementary role for the Enterprise Zone. Lancashire County Council suggested that the role of the Enterprise Zone in relation to the Preston and Lancashire City Deal should be referenced and emphasis placed on the role of the City Deal and its potential to significantly improve the economic and physical connectivity.

Residents suggested that there have been low levels of interest in the Enterprise Zone, which will impact on housing requirement in the area.

Some residents asked whether the Council had contacted BAE Systems Real Estate Solutions to enquire about the future potential employment situation and business take-up at the new Enterprise Zone.

Housing requirement

Treales, Roseacre and Wharles Parish Council commented that it is not clear why a large amount of additional housing is required in the area considering loss of jobs at BAE Systems, Warton and fewer local jobs. The loss of jobs at BAE Systems, Warton should be factored into the housing requirement.

Affordable housing

A resident referred to the GEC Marconi site, which provides 30% affordable housing, they questioned whether the remaining dwellings would become affordable if they are not sold.

Local centre

BAE Systems Real Estate Solutions commented that paragraph 7.49 should state that Warton will be a key service centre rather than an improved local centre.

Bryning with Warton Parish Council claimed that Warton does not have the local services, retail, and commercial or highways transport access to be a local service centre. Warton is not at an equivalent level to Freckleton or Kirkham for service provision. It will not be a key service centre on a par with Lytham and St Annes by 2030. A greater availability of facilities and open recreational green space should be available for the community to meet the vision

for Fylde but these should be in keeping with the 'rural' nature of the village. Warton should not be elevated to a key service centre.

Cllr Brickles and a resident commented on the reference to Warton becoming a key service centre, which had been agreed at a Local Plan Steering Group meeting to be deleted and remain as a local service centre.

Some residents commented that Warton does not have a centre and the current village hall is inadequate in size. The residents claimed that the vague mention of community facilities is hardly likely to solve the social problems which will arise. Some residents commented that the area is not a service centre and it will not become one, they also commented that the document does not say when Warton will become a key service centre by. Residents also said the document should specify the infrastructure upgrades needed and by when they will be delivered

Site H8 Land West of Warton

Bryning with Warton Parish Council commented that the open green space along Lytham Road, west of the settlement boundary in the area designated site H8, Riversleigh Farm should be identified and allocated for recreational open space in accordance with chapter 14. The Parish Council suggested that financial provision should be sought via CIL as an identified need.

There was support from residential developers for sites H8 and H9, who suggested the sites could accommodate additional residential development over the proposed allocation, which could meet the bulk of Warton's needs and could be delivered earlier than the suggested phasing. They also questioned the deliverability of site H10, which is constrained by different land ownership, land in Flood Risk Zones 2 and 3, protected playing fields and land safeguarded for mineral extraction.

A residential developer suggested amendments to the references to wastewater infrastructure claiming wastewater infrastructure in the Warton Area may need to be upgraded to deliver part of this site (with regards to site H8). For all sites listed in policy SL3, it should refer to wastewater infrastructure in the Warton area may need to be upgraded in order to deliver these sites. This was based on the Flood Risk Assessment submitted with the planning application on site H8.

Some residents commented that the proposed allocation included land currently used for a range of businesses and the current proposal does not include an area to relocate new businesses.

Some residents commented on the site phasing which is phased to deliver housing later in the plan period. However, residents in the vicinity of the site claimed that they received printed proposals which were not mentioned at the public consultation event.

A resident suggested that site H8 should be built first in Warton to allow for the provision of a large public space in this area of the village.

Residents commented that the site contains tree preservation orders and wildlife (biodiversity).

A resident supported the development of this site and supported the development of a wider range of shops in Warton.

Site H9 Land North of Warton

There was support from residential developers for sites H8 and H9. The developers suggested the sites could accommodate additional residential development over the proposed allocation, which could meet the bulk of Warton's needs and could be delivered earlier than suggested in the phasing.

Residents commented that the site contains biodiversity.

Some residents commented on the site phasing which is phased to deliver later in the plan period. However, residents in the vicinity of the sites claimed that they received printed proposals which were not mentioned at the public consultation event.

Site H10 Land East of Warton

Residential developers questioned the deliverability of site H10, which is constrained by different land ownerships, land in Flood Risk Zones 2 and 3, protected playing field and land safeguarded for mineral extraction.

Residents commented on the number of ponds on the site, which should be protected as well as it being in a Flood Risk Zone.

Many residents referred to an existing covenant on two triangular areas of land within this site which prohibit any development for 20 years.

Many residents objected to the inclusion of Bridges Playing field within this site.

Sport England objected to the loss of the playing field within site H10, unless the Playing Pitch Strategy clearly demonstrates the site is clearly surplus to requirements, i.e. it is not needed to be brought back into use to support existing demand or demand generated from the increase in housing in the area, or the policy specifies a replacement within the locality should be found.

The Boys' Brigade raised concerns about residential development adjacent to their training site and the potential for future residents to object to their activities on site.

Site H12 Former GEC Marconi Factory Site

BAE Systems Real Estate Solutions supported the inclusion of this site and projected commencement. BAE Systems Real Estate Solutions suggested a column is inserted into the table in policy SL3 regarding a potential location for retail and community facilities. BAE Systems Real Estate Solutions claimed that it is important that these key facilities are identified in the Local Plan Part 1 in terms of a broad location.

Many residents suggested this site is sufficient to meet Warton's needs.

Council response

Further Site Suggestions

Further sites suggested by developers, landowners and residents are dealt with in appendix 2.

Members Decision

Mixed use development

Should there be a mixed use and / or employment site at Warton, with employment which compliments the Enterprise Zone.

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning with Warton Neighbourhood Plan Steering Group to identify a suitable site.

The Minority Group Report comments in relation to BAE Enterprise Zone, which is based on high technology and typically creating low volume employment opportunities, will be potentially dealt with through a mixed use development site at Warton.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 to SL4 inclusive in chapter 7) under policy GD3 in chapter 8.

Infrastructure

The Council is developing an Infrastructure Delivery Plan which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Council is liaising with the Local Education Authority, Public Health, Social Services and Highways Services at County Hall to calculate the level of provision of new school places, doctors surgeries, dental practices, social service offices and highway improvements required to accommodate all of the growth planned for Fylde over the lifetime of the Local Plan to 2030. The level of infrastructure provision required to deliver the Local Plan will be set out in the updated Infrastructure Delivery Plan. The Infrastructure Delivery Plan will deal with matters including flooding, drainage, wastewater and sewerage provision, highways infrastructure, electricity supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

Community Facilities

The Council agrees with Sport England regarding the lack of a strategic rationale for the provision of a new swimming pool in Warton to replace the existing facility in Kirkham; and that the reference should be deleted from paragraph 7.49 of the Preferred Options document.

Flooding

Part of site H10 (Land east of Warton) is within Flood Risk Zones 2 and 3. For sites that overlap into Flood Risk Zone 3, Government policy allows housing development if the 'Sequential' and 'Exceptions' test has been met.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare, based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the four Maps showing the Strategic Locations for Development. For strategic location sites with approved planning permissions, the number of dwellings specified in the application has been used as the site's capacity. The Council will apply the density on parts of a site which has planning permission to the whole of the site in the next version of the Local Plan.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Enterprise Zone

The Council agrees with Lancashire Enterprise Partnership's suggestion that the strategic importance of the Enterprise Zone at BAE Systems, Warton needs to be clarified in the plan, and there will be a new policy on the Enterprise Zone as a strategic location. The new policy should be inserted in chapter 9 – The Fylde Economy.

Secondary school

The Council acknowledges the comments made by Bryning with Warton Parish Council, Cllr Sue Ashton, local residents and Carr Hill High School regarding a new secondary school in Warton.

The process of establishing a location for a secondary school is still at an early stage. It is anticipated that a definitive decision as to whether a new secondary school will be required, along with its location within the catchment area identified by Lancashire County Council will be made before the Council issues the next version of the Local Plan (Part 1).

Potential sites for a secondary school within Lytham and St Annes were considered by Lancashire County Council, but such sites were either too small, had planning permission for other uses, or were on sites where development is close to going ahead or being approved.

Land west of Warton was suggested as a preferred location by Fylde Council as it is anticipated that the school could also serve the demand associated with the strategic housing sites proposed at Warton in the Preferred Options. It is also less likely to compete with existing secondary schools and serve the population in east Fylde.

Land at the Great Birchwood site has been considered by the Local Plan Steering Group for the development of a secondary school. However, the site is located in the Green Belt and within Flood Risk Zone 3 (and it is not in close proximity to the housing estates in Warton, so pupils would not walk to the site).

Housing requirement

Comments in relation to the housing requirement are all dealt with in chapter 6.

Housing need – affordable and market housing

Comments in relation to the need for affordable and market housing are dealt with in chapter 10.

Employment requirement

Comments in relation to employment land need are dealt with in chapter 9.

Local centre

The Council agrees that further details should be provided in the Vision in chapter 3 on where Warton will be in 2030 and clarify that it will be a local service centre by the end of the plan period. The Council will also include additional information regarding the Lancashire Enterprise Zone and its importance to the UK's advanced engineering and manufacturing sector within chapter 9 (The Fylde Economy) of the next version of the Local Plan.

Site H8 Land West of Warton

The comments of Bryning with Warton Parish Council regarding the open green space along Lytham Road, being allocated for recreational open space are noted. The Council considers that any new residential development in Warton, including site H8, will need to accommodate green infrastructure for both the existing and new residents.

The Council noted the support from residential developers for sites H8 and H9.

Residents' concerns regarding the relocation of businesses from sites allocated for residential development are noted.

Residents' comments on site phasing and delivery are noted. The Council has agreed to prepare a new policy on housing requirement, including the phasing and delivery of housing on sites which will be inserted in chapter 10 – Provision of Homes in Fylde.

The Council notes the suggestion from a resident that site H8 should be built first in Warton to enable the provision of a large public space in this area of the village.

Residents' comments regarding tree preservation orders and wildlife on the site are noted.

The Council notes a resident's support for the development of this site, together with their support for the development of a wider range of shops in Warton.

Site H9 Land North of Warton

The Council noted the support from residential developers for sites H8 and H9 and their claim that it could be delivered earlier than suggested in the phasing.

Residents' comments regarding biodiversity on the site are noted.

Residents' comments on site phasing and delivery are noted. The Council has agreed to prepare a new policy on housing requirement, including the phasing and delivery of housing on sites which will be inserted in chapter 10 – Provision of Homes in Fylde.

Site H10 Land East of Warton

The Council noted the residential developers concerns over the deliverability of site H10, which they claim is constrained by different land ownership, land in Flood Risk Zones 2 and 3, protected playing fields and land safeguarded for mineral extraction.

Residents' comments on the number of ponds on the site are noted, together with the site being in a Flood Risk Zone.

Many residents referred to an existing covenant on two triangular areas of land within this site which prohibit any development for 20 years.

Comments made by Sport England and local residents regarding the inclusion of Bridges Playing field within this site and the Boys Brigade training site are noted. The Council considers that any new residential development in Warton, including site H10, will need to accommodate existing and new green infrastructure and existing services and buildings (i.e. the Boys' Brigade training site).

Site H12 Former GEC Marconi Factory Site

The Council notes BAE Systems Real Estate Solutions support for the inclusion of this site and the projected commencement of development on site.

The Council agrees with BAE Systems Real Estate Solutions suggestion to insert a column into the table in policy SL3 regarding potential locations for retail and community facilities, so that these facilities are identified in the Local Plan (Part 1).

Residents' comments suggesting this site is sufficient to meet Warton's needs are noted.

The Council considers it necessary to amend policy SL3 and the supporting text to set out the development framework for Warton over the lifetime of the Local Plan to the year 2030.

Inclusion of land at Warton

The Local Plan – Issues and Options document set out five spatial options for the distribution of future development. It is correct that none of these options identified the proportion of development at Warton as set out in the ‘Preferred Options’. However, at the Issues and Options stage the Council asked for views as to whether there are any further options for development in the Borough. In addition, some respondents claimed that when considering options for the location of development, the Enterprise Zone at BAE Systems, Warton should be considered, along with linkages, connectivity and accessibility to Preston. This includes consideration of strategic development in North West Preston, the key transport infrastructure improvements that will be required to enable this to take place and its implications for wider connectivity in Fylde.

In considering the Preferred Option, the Council has taken feedback on the alternative options and the findings of the Interim Sustainability Appraisal. Taking these and further discussions with infrastructure providers on board, the Council concluded that none of the five alternative options individually provided a preferred option for the future development in Fylde. Therefore, the Council proposed the spatial development framework set out in the Local Plan – Preferred Options document.

There has been some very significant changes to the evidence base, with respect to Warton, since the Issues and Options document was written in the autumn of 2011. Firstly the Central Lancashire Highways and Transport Masterplan was put out for consultation from 7th January – 25th February 2013 and published in April 2013. This includes the provision of a new junction 2 on the M55 and the proposed construction of the Preston West Distributor road, plus a new park and ride station at Cottam. This new infrastructure provides greatly improved access to Warton. It creates the potential for people to live in Warton and make a relatively short journey to the Park and Ride Station (Cottam Parkway) where they can then easily access the national rail network. This makes Warton a more sustainable settlement and increases its potential to accommodate new development.

Secondly, as a result of the designation of the Lancashire Enterprise Zone which came into effect on 1st April 2012 the Government and a number agencies / bodies, including Fylde Council, place strategic importance on the Enterprise Zone for employment growth. The Local Development Order for the Enterprise Zone at BAE Systems, Warton was adopted on 1st October 2012. The Enterprise Zone is forecast to lead to the creation of new jobs. People coming to work at Warton should be given the opportunity to live at Warton and new community facilities should be provided for both existing and new residents.

These two very important changes to the evidence base meant that Warton should be regarded as an opportunity to create a more sustainable community. The NPPF was published in March 2012, which was after the Issues and Options document had been written. The NPPF requires a more positive approach to be taken with respect to providing new employment and housing in close proximity.

Unlike the other strategic development locations, Warton is not tightly constrained by Green Belt, flooding, infrastructure constraints or environmental designations. Therefore, given the new evidence and the opportunities offered by new infrastructure, housing allocations were included at Warton. These are intended to complement the jobs that would be created by the Enterprise Zone and the improvements in Warton’s accessibility. In order to ensure that Warton is extended in a sustainable manner, there will also need to be further investment in local facilities as set out in the Preferred Option document.

The evidence base is changing with new evidence being collected on the viability of the Plan, the amount and types of new housing that are needed as well as infrastructure provision. All

of this information is being taken into account as the Council prepares the next version of the Local Plan.

Masterplan

The Council considers both the comprehensive masterplanning and infrastructure delivery planning of Warton to be a priority to ensure that all new growth in Warton is planned, phased and delivered. A masterplanning approach would include the following key issues: place-making and design, land-uses, the provision of new green infrastructure and movement and connectivity.

Members Decision

The delivery of a masterplan could be achieved by one of three methods:

1. Evolving and defining policy SL3 to formally set out the objectives and requirements and associated site specific infrastructure, or as a minimum to specifically require the need for a comprehensive masterplan and infrastructure approach prior to determining applications;
2. Introducing a further planning policy stage either by establishing the principle and scale of growth at Warton by allocating land now but with masterplanning to occur through a subsequent Supplementary Planning Document;
3. Focussing on the emerging Neighbourhood Plan process to produce a village wide masterplan and set of policies.

The Members resolved at the Local Plan Steering Group meeting on 5th June 2014 to adopt methods 1) and 3) i.e. to expand policy SL3 in chapter 7 of the Local Plan (Part 1) to set out the objectives and requirements and associated site specific infrastructure and to include an additional policy on masterplans; and for the emerging Bryning with Warton Neighbourhood Plan to include a village wide masterplan.

Recommendations for change

- Standardise the Strategic Locations tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Amend policy SL3 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.
- Amend policy SL3 to accommodate up to 650 dwellings during the plan period in Warton, rather than the figure of 1160 which is set out in the Preferred Options document. There would need to be a critical mass, in terms of the number of units in Warton, for the level of infrastructure required to be delivered.
- Amend policy SL3 and the supporting text to set out the development framework for Warton over the lifetime of the local plan and insert a column into the table in the policy regarding the potential location(s) for retail and community facilities.
- Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL3 and issue it for consultation alongside the Publication version of the Local Plan.
- Set out in the justification section that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate land use, such as landscaping and infrastructure.

- Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the 'Maps of the Strategic Locations for Development' which accompany policies SL1 to SL4 (inclusive).
- Delete the reference in the last sentence of paragraph 7.49 of the Preferred Options document to: "... and new swimming pool (to replace the existing facility at Kirkham)."
- The Council will set out an explanation of the settlement hierarchy (i.e. key service centre, local service centre) and the retail hierarchy (i.e. town, district / village and local centres) in the next version of the Local Plan (Part 1).
- Insert the following text in the fourth paragraph of chapter 3 – A Vision for Fylde: "Warton will be a local service centre with a Village Centre servicing the enlarged community living within and around Warton and employment opportunities will increase and diversify through development at the Lancashire Enterprise Zone, BAE Systems, Warton." in place of the existing sentence which reads: "Warton will have developed as a result of the Enterprise Zone, with improved local services".
- The Council will work with the Bryning-with-Warton Neighbourhood Planning Steering Group over a masterplanning exercise as part of the Neighbourhood Plan for Warton.
- The Council will work with Bryning-with-Warton Neighbourhood Planning Steering Group to identify a suitable a mixed use / employment site which compliments the Enterprise Zone.
- Add a new policy on Lancashire Enterprise Zone (BAE Systems, Warton) in chapter 9 – The Fylde Economy.
- Add a new policy on housing requirement, including the phasing and delivery of housing on sites at the start of chapter 10 – Provision of Homes in Fylde.
- Prepare a background paper, comprising a portfolio of sites, which will include strategic site assessments.

Policy SL4: Kirkham and Wesham Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
15	11	264	290 ¹⁵

Representations received from:

- Councillor Hardy
- Councillor Nulty
- Kirkham Town Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- Highways Agency
- Blackpool Council
- Lancashire County Council
- Kirkham Grammar School

¹⁵ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

- 190 Residents
- 4 Residential Developers / Landowners
- 1 Retail Developer

What you said

Further site suggestions

Some residents suggested land south of the A583 Preston – Blackpool Road as an alternative site for housing.

Residents suggested Campbell Caravans and Sunnybank Mill as an alternative.

SHLAA site WS08 is suggested by a residential developer for housing. The Council's justification for not including this site, as identified in appendix 2 were suggested as being flawed with access through site H13.

Many residents suggested that the Kirkham and Wesham have already taken a large amount of housing and employment development. They also suggested that the bypass provides an identified definitive boundary. Residents claimed that further development would alter the areas character.

Medlar with Wesham Town Council supported the Minority Group Report, with one exception.

Kirkham Town Council objected to the inclusion of site(s) at Kirkham which are beyond the settlement boundary, on the flood plan and on greenfield sites. The Town Council claims that there are sufficient brownfield sites, unoccupied new builds and new build office / employment units in Kirkham.

Cllr Hardy submitted 'standard letter 1' comments which were also submitted by Kirkham and Wesham residents.

Kirkham Grammar School supported the inclusion of Kirkham and Wesham as a strategic location for development, they suggested that their school playing field identified within site M3 would be suitable for residential development and would link to the Gladman and Bloor Homes schemes.

The existing residential commitments and where further sites are needed were questioned by some residents.

A resident commented that there is no reference to the Clifton, Newton and Salwick Parish Plan.

Mixed use development.

A retail developer suggested the policies do not refer to the benefits that suitable scale ancillary development on employment or housing land can achieve. Provision of non-B Class uses, such as retail within strategic locations could promote the establishment of sustainable communities. The retail developer claimed that retail can also provide an important buffer between residential and less sensitive land uses.

Infrastructure

The Highways Agency commented that the location of the sites south of the M55 may mean a potential impact on the strategic road network. The Highways Agency welcomed the

support for developer funded measures to resolve congestion referred to in paragraph 7.73. The Highways Agency is interested in understanding the evidence which details the level of impact and mitigation / infrastructure improvements required, and whether measures outlined in policy T1 in chapter 12 and the Infrastructure Delivery Plan are sufficient.

The Minority Group Report referred to inadequate infrastructure and pressure the development would create on existing facilities. They suggested to fund adequate infrastructure would be too costly for the number of houses proposed, therefore this would only be phase one and additional housing would be difficult to defend. There would be a loss of farmland and no connectivity to Kirkham and Wesham, poor access and egress and it would not be possible to provide housing within the plan period.

Many residents objected to development in Kirkham and Wesham due to infrastructure:

- Infrastructure cannot cope
- Flooding, poor drainage and sewage provision
- Traffic congestion
- Poor electricity supply
- Overstretched facilities: doctors, dentist, school, railway.

Flooding

Lancashire County Council, as a lead local flood authority, commented that several strategic allocations are located within Flood Risk Zone 2 or 3. There is no explanation within the text as to whether the sites meet the sequential and exception tests as outlined in the NPPF Technical guidance. Lancashire County Council claimed its support for strategic site H7 is dependent upon the site meeting the sequential and exception tests. Furthermore, the allocation appears to contradict policy SD1 which prohibits development within Flood Risk Zones 2 or 3

Settlement boundaries

Some residents commented that all sites are outside the settlement boundaries of the towns which contradicts policy GD1 in chapter 8, which directs development to within settlements. Residents also suggested the boundary of the Kirkham – Wesham bypass forms a hard edge and should be protected.

The Minority Group Report commented that employment development at site E4 may leave Junction 3 of the M55 vulnerable to development. Highway infrastructure at Junction 3 and the A585 is currently overburdened and further heavy traffic would be unsustainable. There is no case for employment land and this should be removed.

The Minority Group Report objected to the inclusion of land to west of Kirkham and Wesham as a strategic site. The housing numbers can be accommodated on brownfield land in Kirkham which has not been explored. The bypass forms a hard edge, the proposals are not on the edge of settlements, and they are outside the settlement boundary.

Housing

A resident suggested there is already substantial social housing provided and the market has a range of first time buyers' property.

Residents claim that Kirkham and Wesham have taken a large amount of housing and employment development during the Plan period 1990's to date. This has had a huge impact on the infrastructure of the two towns, if the development shown in Option 4 is accepted it will cause even more problems for the two towns and will change the character of these areas for ever. The resident claims that the infrastructure problems already experienced relate to flooding to highways and homes as a result of poor drainage and

sewage provision, traffic congestion and poor highway safety, increasing demand for school place provision, delays for access to health and associated services and poor electricity supply which results in large areas of Kirkham losing power during periods of high usage.

A resident claims that if this consultation is a genuine attempt to locate housing and employment in areas supported by the community it should take account of residents' views. It is claimed that policy SL2 should replace policy SL4 as a preferred option in the adopted Plan. Whyndyke Farm could be delivered in the Plan period and would provide a school, roads, bus routes, shops, cycle lanes and employment land on one site and it is sustainable; it would also meet the housing and employment needs of Blackpool.

Site H7 Land North of Dowbridge, Kirkham

Many residents submitted objections to the inclusion of this site, referring to:

- Highways access and safety
- Insufficient highways infrastructure
- Increased highway traffic and car parking pressure in Kirkham
- Flooding and increased water volume in Dow Brook
- Subsidence and land slippage
- An over-supply of housing
- Loss of property values
- Increased insurance premiums from rising crime
- Noise and light pollution
- Loss of privacy due to site gradient
- Loss of view
- Impact on residential amenity
- Extra refuse
- Loss of grade 3a agricultural land
- Threat to wildlife, including endangered species
- Landscape impact
- Historical remains and archaeological field interest.
- Inadequate infrastructure
- School places provision

Residents suggested Whyndyke Farm as an alternative site for the housing.

Some residents said they are riparian landowners of Dow Brook, with landownership on both sides of the brook.

Landowners supported the allocation of site H7.

Site H13 Land North of Mowbreck Lane, Wesham

Cllr Eastham commented that the type of 'reserves' should be defined in relation to paragraph 7.76.

Cllr Nulty objected to the residual element of the site coming forward for housing, referring to the loss of best and most versatile agricultural land, the threat to Wesham Marsh, and the number of dwellings already built in Wesham over the last 6 years.

Residents questioned the inclusion of the site when it has been refused numerous times on appeal for housing. Residents commented that the best and most versatile agricultural land should not be lost.

A residential developer supported the inclusion of this site, however they suggested further housing should be identified to ensure more sustainable distribution of development. The

residential developer claimed that additional development would be directed to Wesham due to Green Belt and Area of Separation (policy GD2), comprising a narrow strip of open land between Wrea Green and Kirkham.

Site M3 Land North of Blackpool Road, Kirkham

Cllr Nulty commented that this site is very unsustainable and remote from the nearest settlement, with footways to Kirkham and Wesham which are unacceptably difficult.

Many residents suggested this site is not sustainable and does not link to Kirkham, creating unnecessary car journeys to access facilities.

A residential developer supported the inclusion of this site, however they suggested the site could be delivered sooner.

Site E4 Land West of Fleetwood Road, Wesham

Blackpool Council suggested reference to measures that will improve the sustainability / connectively of this site could be strengthened in paragraphs 7.69 and 7.87.

Cllr Nulty commented that the site is outside the settlement boundary and there is no evidence of need for these type of economic development in the Wesham / Greenhalgh / Kirkham area. Cllr Nulty also commented that Mill Farm contains small businesses which are unregulated.

Treales, Roseacre and Wharles Parish Council objected to the inclusion of this site, suggesting it is not aligned to Wesham settlement boundary, creating a hard brownfield site between junction 3, Wesham and Kirkham.

Some residents were concerned that Wesham - Greenhalgh – Junction 3 of M55 would become a conurbation. A resident suggested development on this site would undermine the market town of Kirkham.

Residents commented that the site is within Flood Risk Zone 2, contradicting other Local Plan policies and the Vision for Fylde set out in chapter 3. Residents claimed that the displacement of the water would impact on existing development.

A mixed use developer supported the inclusion of the site, but raised concerns over the reference in paragraph 7.87 to the protection of 4.5ha of woodland.

There was support from a resident for Wesham becoming a centre for sports excellence.

Council response

Further Site Suggestions

Further sites suggested by developers, landowners and residents are dealt with in appendix 2.

Mixed use development

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites. Comments in relation to mixed use development on strategic sites are dealt with under policy GD3 in chapter 8.

Infrastructure

Residents' and the Minority Group Report's concerns regarding the existing infrastructure problems in Kirkham and Wesham are noted.

The Council is developing an Infrastructure Delivery Plan, which will set out all of the infrastructure (Transport, Energy, Social and Green infrastructure) which is required to deliver all of the growth proposed in the Local Plan Part 1. The Infrastructure Delivery Plan will deal with matters including school places, doctors and dental surgeries, water supply, flooding, drainage and sewerage provision, highways infrastructure, energy supply and provision of facilities and services. The draft Infrastructure Delivery Plan will be updated and issued for consultation alongside the Publication version of the Local Plan.

The comments and position of the Highways Agency are noted. The Council will engage with the Highways Agency at relevant stages of the Local Plan and Infrastructure Delivery Plan production.

Employment land need

Comments in relation to the Employment Land Need Study and inclusion of the Warton Enterprise Zone are dealt with in chapter 9.

Flooding

Areas within Flood Risk Zone 3 are considered to be at the “highest” risk of flooding. Part of site H7 – Land North of Dowbridge is in Flood Risk Zone 2. Government policy allows housing development in Flood Risk Zone 2 only if the ‘Sequential Test’ has been met which shows that there are no appropriate alternative sites that are not within Flood Risk Zone 2.

For each strategic location site, the dwelling threshold is calculated at 30 dwellings per hectare based on 60% developable area. The 40% non-developable area of the site could include land within Flood Risk Zones 2 and 3 and be used for appropriate forms of land use, such as landscaping and infrastructure. The Council will identify the non-developable areas within Flood Risk Zones 2 and 3 on the Map of Kirkham and Wesham Strategic Location for Development. For strategic location sites with planning permissions, the number of dwellings specified in the application has been used as the site’s capacity. In the next version of the Local Plan, the Council will apply the density on parts of a site with planning permission to the whole of the site.

Comments in relation to sewage and surface water flooding are dealt with in chapter 13.

Medlar with Wesham Town Councils support for the Minority Group Report is noted.

Kirkham Grammar School’s support for the inclusion of Kirkham and Wesham as a strategic location for development is noted together with their suggestion that their school playing field (identified within site M3) would be suitable for residential development.

A resident’s comment regarding there being no reference in the Local Plan to the Clifton, Newton and Salwick Parish Plan is noted.

Settlement boundaries

Kirkham Town Council’s comments regarding the inclusion of site(s) at Kirkham which are on the flood plain and in Flood Risk Zones 2 or 3 are dealt with under ‘Flooding’ in the Council’s Response to policy SL4, above.

Kirkham Town Council’s and residents’ comments in relation to brownfield (previously developed land) versus greenfield sites are dealt with in chapter 6.

Kirkham Town Council, the Minority Group Report’s and residents’ comments that all sites are outside the settlement boundaries of Kirkham and Wesham are noted. The residents go on to claim that this contradicts policy GD1 in chapter 8, which directs development to within settlements. The first paragraph of policy GD1 refers to development being directed towards

existing settlements and, within settlement boundaries. The third paragraph looks at development outside settlement boundaries, which will be assessed against national policy and any relevant Local Plan policies. Consequently, the allocation of land for development outside the existing settlement boundaries of Kirkham and Wesham does not contradict policy GD1.

Proposed development is located outside the existing settlement boundary of Kirkham and Wesham, but, as with other potential allocations, it will be necessary to extend the settlement boundaries in order to incorporate the development land within the settlements.

Housing

The comments made by a resident suggesting there is already substantial social housing provided and the market has a range of first time buyers' property is answered in the Council's Response to Housing Requirement in chapter 6.

The Council notes residents' comments regarding replacing policy SL4 with policy SL2 as a preferred option in the adopted Plan. However, as all of the housing growth for Fylde that is projected over the plan period is to be delivered, then land at both Fylde-Blackpool Periphery Strategic Location (policy SL2) and land at Kirkham and Wesham Strategic Location is required. The Council agrees that Whyndyke Farm is a sustainable location which could provide a school, roads, bus routes, shops, cycle lanes and employment land; but development is also required in Kirkham and Wesham.

Site H7 Land North of Dowbridge, Kirkham

Residents' objections to the inclusion of site H7 are noted. Many of the issues raised relate to the impact of new residential development on existing infrastructure (including highways, surface water and wastewater, and the provision of school places) all of which are dealt with under 'infrastructure' above. The issue of over-supply of housing is dealt with in the 'Housing Requirement' section under the Council Response in chapter 6. The comments regarding wildlife, landscape impact and heritage assets are dealt with in chapter 14. The comments relating to noise and light pollution, loss of privacy, loss of view and impact on residential amenity, and the generation of extra refuse are all issues that relate to specific planning applications rather than to policy SL4.

Residents' suggestions that Whyndyke Farm be identified as an alternative site for housing, in place of Kirkham and Wesham, is noted. The Council has identified strategic locations for development and has allocated land for housing at Whyndyke Farm and at Kirkham and Wesham so as to meet the overall housing requirement over the lifetime of the Local Plan to the year 2030.

Residents' claims that they are riparian landowners of Dow Brook are noted.

Landowners support for the allocation of site H7 is noted.

The Council agrees to delete site H7 – Land North of Dowbridge, Kirkham as 42% of the site is located within Flood Risk Zone 2, which lies adjacent to the existing boundary of Kirkham. The developable area of land on site H7 for the construction of houses is located east of the flood risk zone, away from the settlement boundary of Kirkham.

Site H13 Land North of Mowbreck Lane, Wesham

The Council agrees with Cllr Eastham that the type of mineral 'reserves' (i.e. sand and gravel) should be defined in paragraph 7.76.

Cllr Nulty's and residents' comments on the loss of best and most versatile agricultural land and the threat to Wesham Marsh are noted. Any proposal to develop best and most

versatile agricultural land or to develop within or in close proximity to a nature conservation site will be considered on its merits, alongside all of the policies in the Local Plan (Part 1).

Residents' comments regarding the site being refused numerous times on appeal for housing are noted.

The residential developer's support for the inclusion of this site is noted, together with the suggestion that further housing should be identified.

Site M3 Land North of Blackpool Road, Kirkham (i.e. the Kirkham Triangle)

Cllr Nulty and residents' concerns that site M3 is not sustainable and does not link to Kirkham are noted. The Council considers that the site is sustainable as it is located immediately east of the Kirkham bypass, with good connectivity.

The Council noted the support from a residential developer for site M3 and their claim that it could be delivered earlier than suggested in the phasing.

The Council considers that site M3 (Kirkham Triangle) is appropriate for residential use rather than mixed use, and that the site could accommodate an additional 240 dwellings, which were allocated in the Preferred Options document at site H7 – land north of Dowbridge, Kirkham. The residential development on the site will need to be well screened from views in by a comprehensive landscaping scheme including substantial tree belts and green infrastructure.

Site E4 (Mill Farm) Land West of Fleetwood Road, Wesham

The Council agrees with Blackpool Council's suggestion to strengthen the wording in paragraphs 7.69 and 7.87 so as to improve the sustainability / connectivity of this site. The Council considers that site E4, which is allocated for employment and leisure, is located in a sustainable location in close proximity to junction 3 of the M55 with good connectivity to the Lancashire sub-region and to the national motorway network. The site, measuring 4ha, is considered to be a sufficient size to accommodate new and re-located business / employment uses.

The objections raised by Treales, Roseacre and Wharles Parish Council, Cllr Nulty and local residents are noted. The Council considers that there is insufficient space within the existing boundaries of Kirkham and Wesham to accommodate a new 4ha employment site, in close proximity to junction 3 of the M55. The Council considers site E4 to be a sustainable location for a 4ha employment and leisure site.

Cllr Nulty's comments regarding small businesses, which are unregulated at Mill Farm, are noted. The Council considers that if any unregulated activities are taking place anywhere in Fylde, they need to be reported to and be investigated by the Planning Enforcement Team.

This site was allocated as a mixed use employment and leisure site following responses to the Issues and Options consultation carried out during July 2012 and expressions of developer interest. As part of Issues and Options consultation, AFC Fylde made representations that further leisure facilities were specifically required to serve Kirkham and Wesham and that there should be a growth in sporting and recreational facilities. Other respondents considered that there should be initiatives to promote health and wellbeing and that community facilities should be a priority. During the early stages of producing the Preferred Option, representatives of AFC Fylde approached the Council in order to explore the potential of the site for a mixed leisure and employment development. An application for the mixed use of the site has subsequently been submitted and planning permission has been granted.

The Fylde Employment Land and Premises Study – August 2012 identifies a series of potential sites for future employment land provision. Site E4 is identified as a potential area of search for additional employment land (Page 178 Figure 11). The Study identifies that there will be a need to provide a critical mass in order to deliver the new infrastructure required (paragraph 11.46). It identifies the site as being suitable for a mix of larger B1 (a-c), B2 or B8 units which could also meet the sub regional / regional need for motorway related property.

In identifying the site for potential employment development, the study notes that this site has excellent access to the motorway network, located only 0.7 km from Junction 3 of the M55, whilst it also borders Wesham and can, with the provision of some pedestrian crossings, be accessed from Kirkham and Wesham by foot. The study goes on to identify that development of employment uses here would encourage workers to access Kirkham Town Centre for services, benefiting local businesses. Kirkham and Wesham Station is only 1 km away and the area is on existing bus routes. *No 76 bus provides an approximately hourly service in each direction between 07:42 to 19:02 Mon to Sat serving St Annes, Kirkham, Gt Eccleston, Poulton and Blackpool.* Thus, the land could serve as both a motorway business park and meet the local needs of Kirkham and Wesham. It is proposed that the requirement to provide improved access by foot and cycle and the provision of bus stops on the A585 will be made clear in the supporting text.

Access could be provided from the A585 / B5192 roundabout, both for this land and the existing employment uses at Mill Farm. The latter is presently constrained by the nature of the access onto the A585. The study notes that the size of any allocation must balance the need to protect countryside land with the need to provide a critical mass of development that will pay for the new infrastructure required. The Employment Land and Premises Study considers that the suggested allocation of 14 ha would be sufficient for this and could be reduced by around 4ha (to 10 ha) to protect key environmental features, if required. The Fylde Employment Land and Premises Study acknowledges the need to protect key environmental features and any development of the site will need to be carried out in a manner which avoids a harsh urban boundary along Fleetwood Road.

The Study did not consider uses outside traditional employment use classes as this was clearly outside its remit. However, the characteristics that make the site potentially suitable for employment uses could equally relate to potential leisure uses.

It is noted that the Preferred Option text refers to the site being partially developed, whilst the allocation itself does not include the established business ventures that currently occupy the buildings at Mill Farm. It is proposed to identify established employment uses that should be protected from alternative uses and the plan should be amended accordingly. The inclusion of this land within the overall allocation would allow for an opportunity to improve access to the existing employment uses at Mill Farm.

With the retention of woodland areas as set out in the supporting text, there would be sufficient space between the proposed allocation and adjacent uses in Greenhalgh to avoid the amalgamation of built development.

The uses identified within the Employment Land Study and the proposed leisure use would complement rather than compete with established business and facilities within Kirkham and Wesham, providing local jobs and facilities.

According to the Environment Agency Flood Map for Planning (Rivers and Sea), the site is not within Flood Risk Zone 2 or 3. As with all sites within Flood Risk Zone 1, it will be necessary for any future developer of the site to demonstrate that the site can be developed in a manner that will not increase the likelihood of flooding on the site or at other locations.

The site is located outside the existing settlement boundary, but, as with other potential allocations, it will be necessary to extend the settlement boundary in order to incorporate the development land within the settlement.

The need to develop socially cohesive, diverse and healthy communities through investment in existing and the provision of new formal sports facilities across the Borough is set out in objective 5 of the Preferred Option. The Spatial Vision aspires to the creation of significant further educational opportunities and leisure facilities for young people being provided.

The Preferred Option notes that the Local Plan is designed to enable appropriate development and flexibility for leisure, culture and tourism operators so that they can invest in or respond to changes in visitor and leisure preferences (paragraph 9.84). The majority of respondents to consultation on the Issues and Options Document were in favour of protecting existing and providing additional leisure and tourism facilities (paragraph 9.94)

The Sustainability Appraisal notes that there are potential positive impacts of developing the site for mixed leisure and employment uses including opportunities for local community entertainment and interaction, being accessible to goods and services in Kirkham and Wesham and / or near to public or sustainable transport modes. The Sustainability Appraisal sounds a note of caution in that, despite relative proximity to Wesham and Kirkham centres and sustainable travel, the proposed location could lead to increased carbon emissions but notes that the location would result in a lower increase than other potential options.

The support from a resident of Wesham becoming a centre for sports excellence is noted.

The Council agrees to amend paragraph 7.87 by deleting the reference to the protection of 4.5ha of woodland within site E4 (Land West of Fleetwood Road, Wesham). There is a 4.5ha woodland of conifers on the site, but they are not worthy of protection. The Council is to carry out a landscape assessment of the strategic locations for development and areas of separation and the findings from this work will feed into the next version of the Local Plan (Part 1).

Recommendations for change

- Standardise the Strategic Location tables in policies SL1 to SL4 (inclusive) to demonstrate both housing and employment distribution.
- Amend policy SL4 so that it includes a list of all of the infrastructure required to accommodate the level of growth allocated in the strategic location for development.
- Delete the entire reference at policy SL4 to “H7 – Land North of Dowbridge, Kirkham (housing)” from policy SL4.
- Delete “mixed use” and replace it with “(housing)” and add (i.e. Kirkham Triangle)” to the site “M3 – Land North of Blackpool Road, Kirkham” at policy SL4. The whole of this site will be for residential development.
- Remove the figure of “9 ha” of employment land from the column under site “M3 – Land North of Blackpool Road, Kirkham” at policy SL4 and amend the total employment over plan period from “13” ha to “4” ha.
- Amend the Inset Map of Kirkham and Wesham and the Map of Strategic Sites, deleting site H7: Land North of Dowbridge, Kirkham and changing site M3 (Land North of Blackpool Road, Kirkham) from “mixed use” to “housing”.

- Delete paragraphs 7.79, 7.80 and 7.81 and the sub-heading “Land North of Dowbridge, Kirkham (site H7)” from the Preferred Options document.
- Amend the first sentence of paragraph 7.82 of the Preferred Options document by replacing the words “mixed use” with “This residential site ...” in reference to Land North of Blackpool Road, Kirkham (site M3).
- Add a new sentence after paragraph 7.86 of the Preferred Options document saying: “The residential development on the Kirkham Triangle (site M3) will need to be well screened, from views into the site, by a comprehensive landscaping scheme including substantial tree belts and the provision of green infrastructure.”
- Set out in the justification section to the policy that the 60% developable area of sites will not include land in Flood Risk Zones 2 and 3. Land in Flood Risk Zones 2 and 3 could be used for appropriate land uses, such as landscaping, sustainable drainage systems and infrastructure.
- Identify non developable land, which is in Flood Risk Zone 2 and 3, within the Strategic Location sites on the ‘Maps of the Strategic Locations for Development’ which accompany policies SL1 to SL4 (inclusive).
- Strengthen the wording in paragraphs 7.69 and 7.87 of the Preferred Options so as to improve the sustainability / connectivity of site E4 – Land West of Fleetwood Road, Wesham.
- Amend the last sentence of paragraph 7.76 of the Preferred Options to read: “... quality of the reserves of sand and gravel and whether there is a case for prior extraction”.
- Amend paragraph 7.87 of the Preferred Options by deleting the words “...which will be protected ...” from the first sentence of the paragraph.
- Revisit the boundaries on the Inset Map of site E4: Land West of Fleetwood Road, Wesham (i.e. the Mill Farm site).
- Prepare a background paper, comprising a portfolio of sites, which will include strategic site’ assessments.
- Update the draft Infrastructure Delivery Plan, incorporating the list of infrastructure requirements which appears in policy SL4 and issue it for consultation alongside the Publication version of the Local Plan.

Chapter 8: General Development Policies

Chapter 8 General Comments:

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- BAE Systems Real Estate Solution

What you said

In relation to paragraph 8.1, BAE Systems Real Estate Solutions suggested the existing settlement boundary within the Fylde Borough Local Plan for Warton is outdated and does not reflect the urban character of Warton Aerodrome. The Warton settlement boundary does not reflect the importance of the Aerodrome and the Enterprise Zone to the growth and development of Warton and the borough as a whole. The boundary for Warton should show an amendment to include the northern part of the Warton Aerodrome within the settlement boundary.

It was also suggested that the inset maps and strategic sites maps should show the settlement boundaries within the adopted Local Plan as well as the Strategic Development Sites.

Council response

The Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary. The Aerodrome is identified as employment land on the existing Fylde Borough Local Plan Proposals Map. The Council will identify all of the existing employment sites, including the Enterprise Zone, together with all the new employment allocations on the Policies Map.

The Council will identify all of the existing settlement boundaries from the adopted Fylde Borough Local Plan (As altered: October 2005) alongside the proposed Strategic Development Sites on relevant inset and strategic sites maps, and on the new Policies Map which will be prepared to accompany the Publication version of the Local Plan (Part 1).

Recommendations for change

- Identify all of the existing employment sites, including the Enterprise Zone, together with all the new employment allocations on the Policies Map.
- Add existing settlement boundaries from the adopted Fylde Borough Local Plan (As altered: October 2005) to the inset and strategic sites maps and on to the new Policies Map, which will be prepared to accompany the Publication version.

Policy GD1: Settlement Boundaries

Number of representations:			
Comment	Support	Object	Total
9	1	52	62 ¹⁶

Representations received from:

- English Heritage
- Highways Agency
- United Utilities
- Campaign to Protect Rural England (CPRE) – Fylde District
- Singleton Parish Council
- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 2 residential developers
- 1 retail developer
- 45 Residents

What you said*Retain existing settlement boundaries and Countryside policy*

A number of residents suggested that the existing settlement boundary for Warton should remain and sites H8, H9 and H10 should be excluded from inclusion within the settlement boundary as they are not sustainable.

Residents questioned the need for development within the countryside, contrary to policies SP2 and SP9 in the current adopted Fylde Borough Local Plan (As Altered October 2005).

CPRE – Fylde District objected to the removal of countryside designation and policy for Development in the Countryside. CPRE – Fylde District claimed that Countryside Area and Green Belt should be referred to within policies H5 and H6 in chapter 10.

Previously Developed Land (brownfield land)

The Minority Group Report claimed that greenfield land should only be built on as a last resort.

Some residents claimed that all sites within Kirkham and Wesham Strategic Location for development (policy SL4) are contrary to policy GD1, which directs development within settlement boundaries and brownfield sites first. Treales, Roseacre and Wharles Parish Council supported this view, referring to site E4: Land West of Fleetwood Road, Wesham (in policy SL4). The Parish Council also supported brownfield sites in Warton for development.

Singleton Parish Council stated brownfield sites should be used wherever possible, rather than edge of settlements. Some residents suggested that brownfield sites should be built on fully before greenfield sites are granted planning permission.

¹⁶ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

CPRE – Fylde District suggested introducing local brownfield targets to replace the Regional Spatial Strategy (in accordance with paragraph 111 in NPPF). The target should be based on an estimate of brownfield sites coming forward in the plan period, including allowances for conversions, windfall and redundant employment sites.

The Highways Agency were generally supportive of encouraging the efficient use of land and in particular maximising the use of previously developed land, in preference to greenfield, and directing development towards existing settlements, where there is better access to existing services / facilities and a variety of sustainable modes of transport.

Housing requirement

A residential developer considered that it was premature to make decisions on the settlement boundary until future housing requirement is established. They did, however, support the flexibility of the policy in the context of national planning policy.

A retail developer suggested that if identified needs are not met during the plan period, development outside existing settlement boundaries should be considered positively, subject to other Local and National Policy.

Inclusion of BAE Systems within settlement boundary

BAE Systems Real Estate Solutions disagreed with the second sentence of paragraph 8.4. Warton Aerodrome is designated as an existing industrial area located outside the existing settlement. The character of the northern part of Warton Aerodrome is urban in form and scale and would not relate to the character of the Green Belt or Countryside area.

GD1 policy justification

The Environment Agency recommended the following amendment to the 7th bullet point in paragraph 8.3, to read: “*whether the proposal is at risk of flooding and/or will result in an increase in surface water run-off*”.

United Utilities recommended amendments to the 7th bullet point in paragraph 8.3, to read: “*Whether the proposals present the most sustainable form of managing surface water from the site. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available.*”

English Heritage recommended the inclusion of the historic environment within the criteria list for acceptability of the redevelopment of land within settlements within paragraph 8.3, with particular reference to the contribution the site makes to the character and setting of the local area. English Heritage recommended the insertion of “the historic environment” as a criteria in policy GD1. English Heritage referred to the NPPF requirement that a proper assessment should be made to identify land, which would be inappropriate for development because of its historic significance.

Green Belt and Agricultural Land

A residential developer promoted the removal of Blackpool Football Training Ground from the Green Belt for redevelopment.

CPRE – Fylde District sought clarification for the misleading reference in paragraph 8.5 to “former non-Green Belt land outside settlements”.

CPRE – Fylde District suggested producing a map of best and most versatile agricultural land to assist consideration of such land, referred to within the justification for policy GD1.

Council response

Retain existing settlement boundaries and Countryside policy

The adopted Fylde Borough Local Plan (As Altered: October 2005) was based on a 'moratorium' position following a very low previous housing requirement, therefore the Plan did not contain any residential land allocations. In regards to the countryside, policy SP2 (Development in the Countryside Area) and policy SP9 (Diversification of the Rural Economy) resisted residential development except in exceptional circumstances.

Due to a higher housing requirement, the Council no longer operates a 'moratorium' position. The Council's Strategic Housing Land Availability Assessment (SHLAA) has demonstrated that there is insufficient land within the existing settlement boundaries to meet the Borough's housing requirement and some sustainable sites on the edge of existing settlements will need to be identified for housing. The Council can therefore no longer operate a restrictive policy stance in regard to residential development in the countryside.

In regards to Warton, the settlement has been demonstrated to have some facilities and services to make it a sustainable settlement. Contributions towards the provision of improved local facilities, services and infrastructure will be required and will further enhance the settlement's sustainability.

As mentioned above, the Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary.

CPRE – Fylde District objected to the removal of countryside designation and policy for Development in the Countryside. The Council agrees to re-introduce the countryside designation into the next version of the Local Plan. However, it is considered that there is no need for a policy on Development in the Countryside as these issues are already dealt with in the detailed development management policies within the Local Plan.

Previously Developed Land (brownfield land)

Paragraph 17 of the NPPF sets out twelve core planning principles, number 6 states the following:

- Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value.

The NPPF does not specify that brownfield land should be used first.

Objective 1.4) refers to making the best use of previously developed land to reduce the loss of greenfield land. However, unlike some other areas of Lancashire, Fylde does have limited amounts of brownfield land. The Preferred Options document makes an allowance for small sites and windfalls of 31% of the total requirement. It is expected that a proportion of these sites will be brownfield.

Paragraph 6.2 of chapter 6: The Spatial Development Framework refers to: "the Strategic Housing Land Availability Assessment 2012 update (SHLAA) which demonstrates that there is not enough available brownfield land in the Borough to accommodate all new development and sites have been identified for development on some sustainable greenfield land at the edge of existing settlements".

Housing requirement

Comments in relation to housing requirement are dealt with in chapter 6.

Mixed use

Comments in relation to mixed use on residential sites are dealt with under policy GD3, below.

Inclusion of BAE Systems within settlement boundary

As mentioned above, the Council does not agree with BAE Systems Real Estate Solutions that the northern part of the Warton Aerodrome should be included within the Warton settlement boundary.

GD1 policy justification

The Council agrees with the recommendations submitted by the Environment Agency and English Heritage. Recommendations submitted by United Utilities will be included in policy CL1 and the justification text in chapter 13.

Comments in relation to an assessment of land, inappropriate for development because of its historic significance, are dealt with in chapter 14.

Green Belt

The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. The Council has demonstrated through its Strategic Housing Land Availability Assessment (SHLAA) that there is sufficient land located outside the Green Belt to meet the borough housing requirement. The Council is therefore not proposing a strategic review of the Green Belt, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies.

The reference in paragraph 8.5 to “former non-Green Belt land” is a mistake, it should have only referred to “land outside settlements”.

The Council considers that it is not necessary to present best and most versatile agricultural land on the Policies Map. Up-to-date maps of best and most versatile agricultural land are held by Natural England on their website.

Recommendations for change

- Re-word the 7th bullet point in paragraph 8.3 of the Preferred Options to read: “Whether the proposal is at risk of flooding and / or will result in an increase in surface water run-off. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available.”
- Add ‘the historic environment’ to 2nd paragraph, of policy GD1. The text should read: “...open and recreational space, the historic environment and nature conservation ...”
- Add the following bullet point to paragraph 8.3 of the Preferred Options: “The historic environment with particular reference to the contribution the site makes to the character and setting of the local area”.
- Amend paragraph 8.5 of the Preferred Options by deleting “former non-Green Belt” and retaining “land outside settlements”.
- Add existing settlement boundaries to inset maps, the strategic sites maps and to the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan.



Policy GD2: Area of Separation

Number of representations:			
Comment	Support	Object	Total
11	1	159	171 ¹⁷

Representations received from:

- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Councillor Hardy
- Councillor Speak
- Greenhalgh with Thistleton Parish Council
- Newton with Clifton Parish Council
- Treales, Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CPRE) – Fylde District
- The Minority Group Report
- 1 residential developer
- 154 Residents

What you said

There were many objections to the policy, with other areas of separation suggested at:

- North of Warton between Warton and Wrea Green;
- Dow Brook/Spen Brook, Kirkham, to Treales;
- Moorside, Treales, to Wesham, including Mowbreck Lane, Church View Farm and the countryside either side of Mowbreck Lane down to Dow Brook, Kirkham;
- Land between Dowbridge, Kirkham and Newton;
- Land west of Westby between Westby and Whitehills;
- Land between Wesham and Greenhalgh;
- Land between Poulton and Singleton;
- Land between Clifton village, and Salwick toward Lea and Bartle/Preston
- Land to the west of Kirkham to Westby;
- Land to the north of Kirkham to Wesham;

¹⁷ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

- Land to the east of Kirkham to Newton; and
- Land around Kirkham, Wesham and Greenhalgh
- Whyndyke Farm

Cllr Speak, Cllr Hardy and Cllr Ford on behalf of Liberal Democrat Members and supporters, including Councillors, and the Minority Group Report supported further areas of separation.

Greenhalgh-with-Thistleton; Treales, Roseacre and Wharles and Newton-with-Clifton Parish Councils supported the policy and suggested further areas of separation.

Many residents suggested an extension to the existing Green Belt at Freckleton to surround the current settlement boundary of Warton.

It was suggested that the policy is unsound and not satisfactorily justified. The approach to establishing Green Belt should be applied given it is essentially the same policy approach.

CPRE – Fylde District commended the Council for the protection of the Green Belt and generally supported policies which resist inappropriate development in the Green Belt and other minor alterations. CPRE – Fylde District also suggested additional areas of separation.

Council response

In response to the residents' suggested extension to the existing Green Belt at Freckleton to surround the current settlement boundary of Warton, the Council is not proposing a strategic review of the boundaries of the Green Belt as part of the preparation of the Local Plan.

The overarching principle of the area of separation is to maintain the identity and distinctiveness of the settlements of Wrea Green and Kirkham, which could be at threat of merging. Although not supported by government policy in the same way as Green Belt, areas of separation can serve to identify smaller areas of separation between settlements. In the case of Wrea Green and Kirkham, this narrow strip of land measures 1,052 metres at its narrowest point. It is important that this narrow strip of land is protected from development, in order to prevent the gap becoming any narrower.

The Council will prepare a background paper in support of the Area of Separation policy, including an assessment of additional areas of separation. The Council is going to consider all new area of separation sites put forward in the background paper. The Council also considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, including landscape buffers, to provide a robust evidence base and justification for policy GD2, together with policy ENV1: Landscape, in chapter 14.

Paragraph 8.7 says: "No strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan, although minor alterations may be required to accommodate the precise boundaries of some site allocations or to amend minor anomalies". The Council will consider making minor amendments to Green Belt boundaries if needed for strategic sites in Part 1 of the Local Plan.

Recommendations for change

- Prepare a background paper, including a map of all of the suggested areas of separation, to justify policy approach. The background paper will also go through each of the suggested

further areas of separation and explain whether or not they are being taken forward in the Local Plan (Part 1).

- Add the following text to the end of paragraph 8.8 of the Preferred Options: “The Council will carry out landscape assessment work at the strategic locations for development across the Borough, part of this work will determine whether or not further areas of separation should be designated”.
- The Council will consider making minor amendments to Green Belt boundaries if needed for strategic sites in the Local Plan (Part 1).

Policy GD3: Promoting Mixed Use Development

Number of representations:

Comment	Support	Object	Total
2	2	1	5

Representations received from:

- Highways Agency
- BAE Systems Real Estate Solutions
- Sport England
- 1 Retail developer
- 1 Resident

What you said

There was support for the policy, with suggestions that the policy should be expanded to support mixed use development in all locations.

A retail developer suggested that policy SL3 in chapter 7 contradicts policy GD3 by only identifying housing and no mixed use or employment use at Warton.

The Highways Agency supported the promotion of mixed use development within close proximity to key centres and sustainable transport modes, as such an approach will help to reduce trip distance between homes, jobs and services, promote linked trips and help to facilitate a reduction in the need to travel particularly by private car.

BAE Systems Real Estate Solutions suggested the promotion of mixed use on land which is dominated by a single land use where there is evidence that it is no longer required and its redevelopment for mixed use would help to create a more diverse economy and deliver sustainable communities.

Sport England would welcome the inclusion of ‘sport’ in parts a) and b) of policy GD3.

Council response

Policy GD3 supports mixed use development, in accordance with the NPPF.

Members Decision

Should provision be made for a mixed use and / or employment site at Warton?

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning and Warton Neighbourhood Planning Steering Group to identify a suitable site.

The Council agrees to clarify the relationship between mixed use in policy GD3 and mixed use on strategic sites (policies SL1 and SL3) in chapter 7. Policy GD3 needs to be expanded to say that a mixed use on the residential sites would be supported providing it does not undermine the housing delivery on that site and it accords with other policies in the Local Plan. The Council does not want employment allocations turning into mixed use with residential and employment development.

The Council agrees to add references to sport in parts a) and b) of policy GD3, in line with Sport England's comments.

Recommendations for change

- Add a new criterion to policy GD3: "A mixed use at the strategic locations would be supported providing it does not undermine the housing delivery on that allocation and it accords with other policies in the Local Plan".
- Amend part a) of policy GD3 to read: "... business, sport and recreation, open space and ..."
- Amend part b) of policy GD3 to read: "... include business, sport and open space."

Policy GD4: Large Developed Sites in the Countryside

Number of representations:

Comment	Support	Object	Total
1	1	2	4

Representations received from:

- Highways Agency
- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- Residents of Mythop Road

What you said

The Highways Agency were generally supportive of providing development within the rural area where it is an appropriate scale and addresses identified housing or employment need. Essential infrastructure, such as public transport would be supported.

CPRE – Fylde District suggested ‘landscape setting’ is added to criterion a) of policy GD4.

English Heritage recommended reference to the ‘historic environment’ in criterion a), in particular the contribution the site makes to the character and setting of the local area and potential undesignated archaeological assets.

Residents of Mythop Road proposed that it would not be possible to resolve water issues at Fylde-Blackpool Periphery without infringing on policy GD4.

Council response

The Council agrees to add ‘landscape setting’ and ‘historic environment’ to criterion a) of policy GD4.

The Council note the comments made by the Highways Agency regarding the public transport infrastructure and residents of Mythop Road with reference to water issues at Fylde-Blackpool Periphery. The Local Plan is accompanied by an Infrastructure Delivery Plan, which is being developed in consultation with key infrastructure providers. The Infrastructure Delivery Plan sets out the infrastructure and services that will be required to support all of the growth and development that is being proposed in the Local Plan, including the provision of public transport, water supply and wastewater provision; together with details of costs, funding and delivery. The draft Infrastructure Delivery Plan will be amended and issued for consultation alongside the Publication version of the Local Plan (Part 1).

Recommendations for change

- Amend criterion a) of policy GD4 so that it reads: “The proposal would have no greater impact on the character, appearance or nature conservation value of the countryside, Area of Separation, landscape setting, historic environment or Green Belt than the existing development, in terms of footprint, massing and height of the buildings;”
- Amend paragraph 8.15 of the Preferred Options document to read: “It is important that redevelopment of existing or redundant large developed sites in the countryside and Green Belt respects the character of the countryside area or Green Belt land in which they are situated; together with the historic environment, in particular the contribution the site makes to the character and setting of the local area and potential undesignated archaeological assets. Such sites include Kirkham Prison and Weeton Camp ...”
- Issue the draft Infrastructure Delivery Plan, which will be amended and re-issued for consultation alongside the Publication version of the Local Plan (Part 1).

Chapter 9: The Fylde Economy

Chapter 9 General Comments:

Number of representations:			
Comment	Support	Object	Total
9	0	2	11 ¹⁸

Representations received from:

- Blackpool Council
- Lancashire County Council
- Campaign to Protect Rural England (CPRE)
- BAE Systems Real Estate Solutions
- Federation of Small Businesses
- Blackpool Fylde and Wyre Trade Union Council
- 3 residents

What you said

A resident commented that the High Tech development in Warton needs supporting by service industries.

Several residents commented on the information provided in the 2012 study. It considered four other approaches all of which indicated that there was no need for additional employment land. These factors make the Preferred Options proposal highly questionable as the reality is that in overall terms the amount of employment land in use will either stay broadly the same or reduce.

Blackpool Council welcomed the recognition of the employment market of the wider Fylde Coast Sub-Region.

Lancashire County Council suggested that housing growth ambitions should support strategic economic development priorities including BAE Systems, Warton existing operations and the delivery of the Enterprise Zone site.

CPRE – Fylde District recommended that the employment land requirement, including the needs of Blackpool, is revised by reviewing the findings of the Study and the implications of the Warton Enterprise Zone.

BAE Systems Real Estate Solutions commented that policy EC1 should recognise that mixed use development on employment land may help to bring about improvements in the residual supply that will help meet the future need and demand for employment purposes. A cross-reference to policy GD3: 'Promoting Mixed Use Development' in chapter 8 would assist in this.

The Federation of Small Businesses was pleased the Plan did not see the need for additional large retailer provision in the immediate future. The evidence suggests that local

¹⁸ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

spend with local small businesses is much more likely to be re-spent again in the local area. Vitality and viability of our town centres is therefore of great importance. The Federation agreed with the key objectives in the economy strand of the Preferred Options document. The Federation commented that Leisure, Culture and Tourism promotion are also key and these should be part of each Town Centre Management Plan.

Blackpool, Fylde and Wyre Trade Union Council welcomed new homes being made available for people and would like to see the building work being done by local workers.

Council response

The Council will consider how best to encourage service industries to support high tech development in Warton.

Comments relating to mixed use on employment land are dealt with under Policy GD3 in chapter 8, together with the following Members Decision.

Members Decision

Should provision be made for a mixed use and / or employment site at Warton?

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning and Warton Neighbourhood Planning Steering Group to identify a suitable site.

The cross reference to policy GD3 is not considered necessary. This is a general development policy that runs across the whole of the Local Plan as a cross cutting theme.

Comments relating to the Employment Land Study 2012 and the employment land requirement are addressed under policy EC1.

The comments made by Blackpool Council and the Federation of Small Businesses are noted.

Comments relating to the housing growth needed to support strategic economic development priorities are addressed under chapters 6 and 7.

The Council will consider whether or not to include a policy on employing local workers as suggested by the Blackpool, Fylde and Wyre Trade Union Council.

Recommendations for change

- None

Policy EC1: Overall Provision of Employment Land

Number of representations:			
Comment	Support	Object	Total
5	3	8	16 ¹⁹

Representations received from:

- Greenhalgh with Thistleton Parish Council
- Treales Roseacre and Wharles Parish Council
- Kirkham Town Council
- Lancashire County Council
- Blackpool Council
- Wyre Borough Council
- Blackpool International Airport
- Highways Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- The Minority Group Report
- 1 retail developer
- 1 mixed use developer
- 4 Residents

What you said

A number of respondents challenged the future requirement being based upon historical take-up. Although there has been consistent take-up of employment land in Fylde, there has also been significant loss of existing employment land, particularly to housing.

A number of respondents made comments suggesting either the deletion of particular sites from this policy, or that the policy be amended to support a broader mix of commercial uses. A mixed use developer suggested for example that an expanded site M1 – Land East of Cropper Road (policy SL2 in chapter 7) covering a wider area, could include retail, hotel, non-residential institutions, assembly and leisure and sui generis commercial uses. The mixed use developer also commented that the Employment Land review is out of date, insofar as it applies to the Former EDS Site, Heyhouses Lane - site H4 (policy SL1), which has subsequently been approved for a mixed use scheme. Particular reference is made to the use of incorrect assumptions around the future supply of land employment land within the Borough and wider Fylde Coast area which is greater than the Employment Land review indicates.

Greenhalgh with Thistleton Parish Council commented that the proposal for 49 hectares is based on a historical projection of greenfield allocations even though there is surplus brownfield / existing allocations. They also said there is no demand for land at this time, particularly for the regionally important / logistical use identified at Junction 3 of the M55. Provision is made for a sizeable leisure allocation within these lands for which there is no

¹⁹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

evidence. The Parish Council sees no justification for the inclusion of sites at Kirkham and Wesham in the plan period.

Treales Roseacre and Wharles Parish Council commented that the Warton Enterprise Zone needs to be incorporated into the quantitative assessment of the provision of employment land. Brownfield sites should be considered ahead of site E4 – Land West of Fleetwood Road, Wesham, which is greenfield. The Parish Council suggested that the inclusion of site E4 is in conflict with the Fylde Vision that the highest quality agricultural land will have been protected from inappropriate development.

Kirkham Town Council suggested that policy EC1 should be replaced with policy SL2, so as to ensure a strategic location for development whilst enabling the towns and villages of Rural Fylde to retain their identity with clear areas of separation, whilst retaining sufficient growth to meet their needs within the existing towns and village boundaries.

The Minority Group Report commented on the Employment and Economic Land Study, the consultant determined that whatever statistical approach was used, there was no actual need for additional employment land. The suggested new locations on the Lytham boundary, Poulton boundary, Blackpool International Airport, Whitehills, Kirkham, Wesham and Greenhalgh was simply to offer choice and in the case of Wesham, Kirkham and Greenhalgh access to a Motorway junction, but the report could not offer any need at this time for such locations. The Minority Group Report suggested that the evidence base is flawed resulting in over-allocation of employment land. Part of this allocation could be used for housing, reducing the amount of housing to be built elsewhere. The Minority Group Report raised concerns that the Employment Land Study has not been out to public consultation and was not included in the Preferred Options consultation. The Minority Group Report suggested there is surplus employment land which could be used for housing.

Wyre Borough Council noted that the amount of employment land proposed in the Local Plan, at 49 hectares, includes an element of 15 hectares to provide for Blackpool's needs.

Blackpool Council welcomed the commitment to provide additional employment land to meet Blackpool's employment land needs. They also supported the identification of land at Blackpool International Airport for employment development (site E2) but queried why this precludes Class B1 (b), B1 (c), B2 and B8 uses. Blackpool Council also supported the 20ha allocation of land at Whyndyke Farm for employment development (site M2) and the appropriate use classes for the site, in accordance with recommendations set out in the Employment Land and Premises Study (2012).

Policy EC1 also provides policy for existing employment sites and says that within the existing employment sites identified in the Fylde Borough Local Plan (policy EMP2), land and premises will be retained in B use classes unless it is demonstrated to the satisfaction of the local planning authority that there is no reasonable prospect of the site being used for employment purposes. Blackpool Council has some concerns with the part of the policy which seeks to retain land and premises in B use classes. Blackpool Council suggested there is the potential for it to be more strongly worded in order to retain some employment uses on existing sites and allow non B uses only in exceptional circumstances.

Lancashire County Council suggested that further consideration should be given to a broader mix of uses as enabling development at Site E2, Blackpool International Airport.

Blackpool International Airport noted that policies SL2 (in chapter 7) and EC1, identify 5ha of land (site E2) as a strategic location for development. They commented that the area identified is actually 10ha.

Blackpool International Airport sought a policy framework which:

- Establishes the Council's ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;
- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

In respect of the latter bullet point Blackpool International Airport suggested that commercial development would be suitable on site E2.

The Highways Agency was generally supportive of focussing employment development close to existing Key Centres, given the benefits of good access to existing transport services and facilities. The Highways Agency were, however, concerned for the potential of increased congestion at junction 4 of the M55 and on the A585. A cumulative impact assessment of the employment provisions needs to be undertaken to understand the scale of the impacts and the level of mitigation required.

The Highways Agency emphasised the need for an efficiently operating strategic road network in supporting economic growth and expected consideration to be given to the impacts (additional travel demands), the measures (policy and infrastructure interventions) and the effect / adequacy of these measures to support the development aspirations.

CPRE – Fylde District commented that there is no evidence of leisure development land requirements at site E4. Evidence of the need to designate greenfield land for leisure purposes should be provided, and the classes of leisure development allowed in greenfield Countryside Area locations defined.

Council response

The Employment Land and Premises Study 2012 considers five models for the assessment of employment land allocations for the forthcoming Local Plan period. These are:

1. Projection forward of historic land take-up
2. Policy off - Forecast based on employment projections
3. Policy off - Labour supply projection
4. Policy on - Forecast based on employment projections
5. Policy on - Labour supply projection

In other local authority areas where similar studies have been completed, the use of employment and labour supply models has frequently generated unusually negative outcomes. In instances where BE Group has been involved these models have been discounted in favour of historic land take-up trends.

The study bases the requirement for Fylde's future employment land on the evidence of annual average take-up rate experienced by the Borough since 1989. This is considered to be a long term trend.

In accordance with the ODPM 'Employment Land Reviews - Guidance Note', the study identified the most appropriate broad locations for future employment land provision. In maximising the Borough's assets consideration has been given to being accessible by public transport; environmental impact; viability (in terms of market demand); and being close to population centres. The Enterprise Zone at BAE Systems, Warton was excluded from this

stage of the study as it is a planned re-use of an established employment allocation, and purports to serve as a location for specific industry sectors relevant to the site's current use.

The Employment and Land Premises Study 2012 recommends the protection of the identified current land supply that is not the subject of existing consents for alternative uses. Non B use class uses should therefore only be considered in exceptional circumstances. In exceptional circumstances appropriate enabling development will be supported on existing employment sites in order to support retention of employment uses on these sites.

The Local Plan should be read as a whole, in accordance with the proposed new wording in chapter 1, and every policy and justification should be considered alongside all of the other policies and balance needs to be made when considering planning applications.

The Employment Land and Premises Study 2012 recommends the Blackpool International Airport land for B1(a) offices at paragraph 11.18 and Table 66. However, at paragraph 11.17 of the Employment Land and Premises Study, it is stated that at least half of the land should be allocated for B1, B2 and B8 employment uses. In paragraph 11.17 of the Study, BE Group were making the general comment that half the site should be secured for B-class employment, rather than retail, etc. Uses considered to be suitable would reflect what is already in place on Amy Johnson Way.

The Employment Land and Premises Study is part of the Local Plan evidence base. The Council does not normally undertake public consultation exclusively on its evidence base. The Employment Land and Premises Study was available as part of the Preferred Options consultation and respondents have commented on the study's findings. These representations will be considered by the Council as it works towards the next version of the Local Plan (Part 1).

Comments raised in relation to flexibility at Blackpool International Airport are dealt with under policy T2 in chapter 12.

A cumulative impact assessment of the employment provisions will be undertaken in respect of an efficiently operating strategic road network.

Specific comments relating to site H4 (Former EDS Site, Heyhouses Lane) are addressed under policy SL1 in chapter 7.

Justification for leisure development land requirements at site E4 are addressed under policy SL4 in chapter 7.

The Council will identify all of the existing employment land and sites identified in policy EC1 on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

Recommendations for change

- Amend paragraph 9.10 of the Preferred Options document to read: "It is therefore acknowledged that Blackpool's administrative area is characterised by a tightly constrained boundary and its employment land requirement of 14 ha cannot be accommodated on lands within its boundary. Consequently, this results in a combined shortfall of employment land for Fylde and Blackpool, up to 2030, of 49 ha / Fylde 34 ha plus Blackpool 14 ha".
- Amend policy EC1 table relevant to: "Site E2 – Blackpool International Airport – to include B1 (b), B1 (c), B2 and B8 as appropriate use classes".

- Delete the reference to site “M3 – Land North of Blackpool Road, Kirkham or locally known as ‘Kirkham Triangle’ – (mixed use)” from Policy EC1 of the Preferred Options document.
- In paragraph 9.14 of the Preferred Options document clarify that it is important to ensure that employment uses are maximized at Whyndyke Farm and land east of Cropper Road to capitalise on their location close to junction 4 of the M55.
- Identify the boundary of the Lancashire Enterprise Zone at BAE Systems, Warton, the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and proposed new employment allocations identified in policy EC1 of the Preferred Options document on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).
- Revise the Employment Land Study in the light of new employment land information.

Policy EC2: Managing Development of Employment Land

Number of representations:

Comment	Support	Object	Total
5	1	0	5

Representations received from:

- Lancashire County Council
- Lancashire Enterprise Partnership
- BAE Systems Real Estate Solutions
- Highways Agency
- United Utilities

What you said

BAE Systems Real Estate Solutions supported the inclusion of paragraphs 9.19 to 9.23, relating to ‘The Enterprise Zone’. This section should also ensure that there is protection and safeguarding for ongoing and future operations related to the airfield at Warton Aerodrome.

They also commented that in the third line of paragraph 9.20, ‘British Aerospace’ should be replaced with ‘BAE Systems’.

Lancashire County Council and Lancashire Enterprise Partnership commented that under paragraph 9.19 the Enterprise Zone was announced in the Chancellor’s Autumn 2011 Statement, (acknowledged in 1.2.1 of the Warton Local Development Order).

In paragraph 9.20, the focus of the Enterprise Zone is advanced engineering and manufacturing. The regional skills centre / academy is at Samlesbury (which is acknowledged in paragraph 1.2.6 of the Warton Local Development Order).

Lancashire County Council also commented that the strategic importance of the Enterprise Zone at Warton needs to be positioned within the Plan. This should include developing a separate policy for the site as a strategic location.

LCC commented that manufacturing associated with the nuclear industry falls outside Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations (Statutory Instrument 2011/1824) and does not include the production, enrichment, storage, or disposal of nuclear fuel.

The Highways Agency welcomed the recognition that the scale of development should be compatible with the level of existing or potential public transport accessibility.

United Utilities suggested the addition of a further criterion to policy EC2:

'The Council will take account of the following factors when assessing all development proposals for employment uses:

h) the impact on foul and surface water drainage infrastructure especially the need to secure the most sustainable approach to surface water drainage.'

Council response

The Council agrees to incorporate BAE Systems Real Estate Solutions comments in paragraphs 9.19 to 9.23 (inclusive) of the Preferred Options document.

The Council also agrees that Lancashire County Council's and Lancashire Enterprise Partnership's comments, made in relation to paragraphs 9.19 and 9.20, will be incorporated.

The Council considers there is a need to draft a separate policy on the Lancashire Enterprise Zone at BAE Systems, Warton, as a strategic location.

The Council will identify the boundary of the Enterprise Zone at BAE Systems, Warton on the new Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).

The Highways Agency comments are noted.

The Council agrees with the comments made by United Utilities and will make the necessary changes based upon their comments as outlined above.

Recommendations for change

- Add wording to paragraphs 9.19 – 9.23 of the Preferred Options ensuring that there is protection and safeguarding for ongoing and future operations related to the airfield at Warton Aerodrome.
- Amend the first sentence in paragraph 9.19 of the Preferred Options to read: "The Enterprise Zone at Warton was announced in the Chancellors Autumn 2011 Statement and came into effect on 1 April 2012".
- In paragraph 9.20 of the Preferred Options: third line replace "British Aerospace" with "BAE Systems".
- In paragraph 9.20 of the Preferred Options: delete the second sentence and replace with the following text: "The focus of the Enterprise Zone is the advanced engineering and manufacturing sector. The regional skills centre/academy is at Samlesbury".

- Add an additional criterion to policy EC2 and the supporting text of the Preferred Options document, in accordance with the suggestions from United Utilities: i.e. “The Council will take account of the following factors when assessing all development proposals for employment uses: h) the impact on foul and surface water drainage infrastructure especially the need to secure the most sustainable approach to surface water drainage.”
- Add a new policy on the Lancashire Enterprise Zone at BAE Systems, Warton.
- The boundary of the Lancashire Enterprise Zone at BAE Systems, Warton will be shown on the new Policies Map which will be prepared to accompany the Publication version of the Local Plan (Part 1).

Policy EC3: The Rural Economy

Number of representations:

Comment	Support	Object	Total
4	4	1	9

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- National Farmers Union
- Lancashire Wildlife Trust
- Highways Agency
- English Heritage
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 residential developer
- 1 Resident

What you said

A resident commented that Land West of Cropper Road could be developed for a variety of uses.

Treales, Roseacre and Wharles Parish Council proposed that the 4th paragraph of policy EC3 should be redrafted as follows:-

‘The irreversible loss of the best and most versatile agricultural land outside settlement boundaries should be resisted. Development should only take place on such land after all brownfield or lesser quality land has been utilised to meet the Local Plan Vision.’

The National Farmers Union welcomed the promotion of development and diversification of agricultural and other land-based rural businesses. The NFU would not wish to see this as the only option for diversification.

Lancashire Wildlife Trust commented that criterion b) needs to consider the potential impact on European Protected Species (Bats and Barn Owls), which are often associated with such buildings.

The Highways Agency was generally supportive of providing employment opportunities within the rural areas, where it is of an appropriate scale. The Highways Agency support infrastructure improvements which contribute towards a reduction in the use of the private car.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors commented that greenfield land should only be built on as a last resort and that a sustainable rural economy is vital – it provides jobs and leisure and recreational opportunities.

CPRE – Fylde District commented that policy EC3 should mention farming and agriculture, aim to minimise loss of any agricultural land and aim to avoid urban fringe developments creating unnecessary conflict with farming operations.

A residential developer commented that policy EC3 is more onerously worded and inconsistent with the NPPF. Paragraph 111 of the NPPF is clear that concern should only be raised if a proposal results in the loss of 'significant areas' of best and most versatile agricultural land.

English Heritage commented that the policy would benefit from reference to specific aspects of the historic environment that can be used to support the growth and expansion of the rural economy. The Plan should be expanded to include a description of the historic environment in rural areas and an assessment be made of its character and contribution it makes to the area as well as the Lancaster Canal, which runs through Fylde.

Council response

The comments relating to Land West of Cropper Road are listed in the table in appendix 2.

Comments in relation to brownfield (previously developed land) first are dealt with under policy GD1 in chapter 8.

The Council considers that there is a need to be aware of the strategic allocations and what grade best and most versatile agricultural land and ecological issues there are on the sites. The Council also considers it necessary to develop a pro-forma for each site – i.e. a Portfolio of Sites - which sets out this information. There is a need to justify why the Council is allocating sites even if best and most versatile agricultural land; it could be the case that there is an overriding need to develop in a sustainable location. However, best and most versatile agricultural land is not going to be presented on the new Policies Map. Best and most versatile is very broad brush, and it is not subdivided into 3a / 3b. Natural England is responsible for designating land as best and most versatile agricultural land. If Natural England publish a map of best and most versatile agricultural land, then the Council could refer to it in policy EC3 or its supporting text.

The comments made by the National Farmers Union and the Highways Agency are noted.

Any potential impact on European Protected Species is considered in determining a planning application for conversion of agricultural buildings. The Council considers it necessary to separate landscape and nature conservation issues; to retain landscape issues in policy ENV1 and to draft a new policy on biodiversity in chapter 14 which will set out the hierarchy of nature conservation designations and go on to cover species protection, habitat protection and enhancement.

The context to policy EC3 at paragraph 9.31 makes reference to the importance of agriculture. Policy ENV6 (c) in chapter 14 of the Preferred Options document deals with the impact upon surrounding land-uses. The need to read the plan as a whole is set out in chapter 1 (see the recommended new paragraph in chapter 1).

Paragraph 112 in the NPPF refers to the economic and other benefits of the best and most versatile agricultural land. It goes on to say that where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The NPPF does not say concern should only be raised if a proposal results in the loss of 'significant areas' of best and most versatile agricultural land, as suggested by a residential developer.

The comments raised by English Heritage relating to the historic environment and leisure assets, including Lancaster Canal, are dealt with under the re-drafted policy ENV5 of the Preferred Options document and the related supporting text in chapter 14.

Recommendations for change

- None

Policy EC4: Maintaining Vibrant Town and Local Centres

Number of representations:

Comment	Support	Object	Total
13	5	49	67 ²⁰

Representations received from:

- Councillor Eastham
- Blackpool Council
- Wyre Borough Council
- BAE Systems Real Estate Solutions
- English Heritage
- Highways Agency
- 3 Planning Agents
- 42 Residents

²⁰ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

What you said

Numerous residents suggested deleting Warton from the District Centre category. Warton is not a service centre like Ansdell and Freckleton. People go to Freckleton for shopping, the post office, the library, medical centre, financial advice, etc. People do not travel to Warton for any of these facilities, nor for anything else. Residents claimed that Warton is neither a service centre, nor a district centre and never will be, as it is in the wrong position. Residents claimed that this categorisation is a feeble and misplaced attempt to justify substantial development in the fields around Warton.

One resident commented that it is a mistake to allow the NPPF to guide town centre growth as it is very general.

Several residents supported the Council's confirmation at paragraph 9.63 that the NPPF threshold of 2,500 square metres will apply in terms of assessing retail impact.

A retail developer supported the aim to locate town centre uses within existing town centres; and the flexible approach within the policy towards the consideration of town centre uses in edge-of-centre or out-of-centre locations.

Several residents also commented that the Fylde Coast Retail Study, as the title indicates, is a high level, sub-regional, strategic retail study and is not particularly well adapted in terms of looking at the precise needs of Warton (and Freckleton given its proximity). The existing and planned population growth for Warton would provide more than sufficient expenditure to justify a 10,000 square feet net foodstore similar to an Aldi, Lidl or converted (Netto) ASDA type format store. As such, it would not be unreasonable to conclude that there is also a good qualitative needs case to improve the retail provision in Warton.

BAE Systems Real Estate Solutions suggested renaming the section 'Maintaining and Creating Vibrant Town and Local Centres'.

BAE Systems Real Estate Solutions sought clarification on the following: Does the 2011 Study include the demand generated from the Strategic Development Sites and express that in a requirement for both convenience and comparison goods floorspace? This would be useful to understand in terms of the land required for the District Centre for Warton.

BAE Systems Real Estate Solutions supported the principle of preparing a Masterplan for Warton. They suggested that the Part 1 document should identify a broad location for the District Centre in Warton and include the following wording:

'The broad location of the District Centre for Warton is identified on the Inset Map. The District Centre will include retail, community and associated town centre uses for residents, visitors and those working within the settlement. Land will be identified for the District Centre to meet the current and future needs for retail and associated services. This will be identified in the Local Plan Part 2: Site Allocations to 2030.'

Councillor Eastham made the following comments:

- Paragraph 9.53 should clearly set out the 'existing' gross retail floor-space in Fylde, as well as the projected growth in retail floor-space at the end of the Plan period.
- Paragraph 9.57 - The "identified existing floor-space capacity" of Lytham should be clearly identified in this paragraph.
- Policy EC4 should be reworded to say that "retail development will be supported 'where appropriate' within the town centres".

- Paragraph 9.70 - If the Council has no definite plans to produce Town Centre Management Plans this should be reflected in the plan.

Blackpool Council supported the retail approach in line with the Fylde Coast Retail Study.

Wyre Borough Council referenced having due regard to the findings of the updated retail study. It will be important that the Local Plan follows the 'town centres first' principles set out in the NPPF.

English Heritage commented that the Plan should be expanded to include a description of the conservation areas and historic retail environments in Fylde and an assessment made of their character and the contribution it makes to the area. English Heritage recommended that the Council should be undertaking Conservation Area Appraisals to inform the Plan.

The Highways Agency is supportive of providing an adequate range of accessible facilities and services in sustainable locations, which can help to reduce the need to travel. The Highways Agency supported the sequential approach adopted within this policy and focussing new town centres uses towards the existing town centres of St Annes, Lytham and Kirkham, whilst ensuring any retail development will be appropriate in scale, role and function.

The Highways Agency welcomed the recognition that other uses in town and local centres should not have an unacceptable impact on the level of traffic generation and new office developments within these areas should be accessible by public transport to reduce the need to travel by private car.

Council response

In considering the status afforded to Warton, attention is drawn to paragraph 7.49 in chapter 7 of the Preferred Options document: "it is anticipated that development at Warton will provide for increased shops, improved local facilities, and better access to the centre and that this will assist in providing Warton with an improved local centre, and enhanced sustainability as set out in the Vision."

The comments relating to assessing retail impact are noted. The Council will, however, consider preparing a locally set threshold.

In response to BAE Systems Real Estate Solutions comments, the Council will delete "Maintaining" from the sub-title of paragraph 9.49 context to address both maintaining and creating centres.

Both the 2011 Retail Study and the 2014 Update include the following key data inputs:

- population forecasts;
- per capita expenditure data;
- expenditure growth rates;
- special forms of trading (such as online shopping);
- turnover efficiency gain in existing retailers;
- retail planning commitments; and
- consideration of over-trading in the convenience sector.

What they do not do is specifically provide demand generated from the Strategic Development Sites. Outside of the 3 defined town centres it sets out floor-space requirements collectively for Remaining District and Local Centres.

The Local Plan (Part 2) document will identify a broad location for the Village Centre in Warton. The Bryning and Warton Neighbourhood Plan will include a masterplan for Warton

Strategic Location and this will identify a specific location. The masterplan is covered in more detail in policy SL3 in chapter 7.

The Council is unable to amend policy EC4 to say that ‘retail development will be supported ‘where appropriate’ within the town centres as this is not compliant with NPPF. The 6th bullet point in paragraph 23 of the NPPF says “*It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites*”.

The Plan will be amended to reflect Cllr Eastham’s comments in relation to paragraphs 9.53, 9.57 and policy EC4 of the Preferred Options document. The existing floor-space capacity of St Annes and Kirkham will also be identified in the supporting text. The Council’s Economic Development Strategy (page 51 – 7th bullet point) makes a clear and definite commitment to the preparation of Town Centre Management Plans (referred to in paragraph 9.70), which will be reflected in amended wording in the Local Plan.

The Council agrees to add a reference in policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space and to add a new key indicator to monitor retail floorspace in Appendix 5: Performance Monitoring Framework.

Blackpool Council’s, Wyre Borough Council’s and the Highways Agency’s comments are noted.

The comments made by English Heritage relating to the historic environment and leisure assets, including Lancaster Canal are dealt with in the re-drafted policy ENV5 and supporting text in chapter 14.

The title of policy EC4 in the Preferred Options document and the sub-headings prior to the policy and paragraph 9.49 will be amended to ‘Vibrant Town, District and Local Centres’, not ‘Maintaining Vibrant Town and Local Centres’.

The Council considers it necessary to add text to policy EC4 of the Preferred Options document to clarify that Part 1 of the Local Plan will set out which town, district and local centres. Part 2 will review town, district and local centre boundaries; review primary and secondary frontages; and define the primary and secondary shopping area(s).

Recommendations for change

- Delete: “Maintaining” from the title of policy EC4 and from the sub-heading prior to paragraph 9.49 and add the word “District” after “Town” in the title. The text should read: “Vibrant Town, District and Local Centres”.
- Amend policy EC4 to clarify that Part 1 of the Local Plan will set out which are the town, district and local centres. Part 2 will review town, district and local centre boundaries; review primary and secondary frontages; and define the primary and secondary shopping area(s).
- Amend the Retail Hierarchy of Centres in policy EC4 to read: “1. Town Centres; 2. District / Village Centres; 3. Local Centres”
- Add a reference in policy EC4 to a 750 square metre threshold of retail floor-space and add a new key indicator to monitor retail floorspace in Appendix 5: Performance Monitoring Framework.

- In paragraph 9.53 of the Preferred Options document, set out the 'existing' gross retail floor-space and the projected growth in retail floor-space.
- In paragraph 9.56 of the Preferred Options document, identify the existing floor-space capacity of Kirkham.
- In paragraph 9.57 of the Preferred Options document, identify the existing floor-space capacity of Lytham.
- In paragraph 9.58 of the Preferred Options document, identify the existing floor-space capacity of St Annes.
- Amend paragraph 9.70 of the Preferred Options document to read: "Before adoption of the Local Plan Part 2: Site Allocations to 2030, the Council will put in place Management Plans for the town centres, which will address the function and accessibility of each centre and include all planned and envisaged public realm schemes for each of the areas".

Leisure, Culture and Tourism General Comments:

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- BAE Systems Real Estate Solutions

What you said

BAE Systems Real Estate Solutions supports the proposal for the Coastal Parkway and would wish to be involved in the preparation of the Masterplan. BAE Systems Real Estate Solutions wish to ensure that proposals for the Coastal Parkway align with the operational requirements of the Aerodrome and the respective aviation authorities.

Council response

BAE Systems Real Estate Solutions comments are noted.

Recommendations for change

- None

Policy EC5: Leisure, Culture and Tourism Development

Number of representations:

Comment	Support	Object	Total
3	2	1	6

Representations received from:

- Lancashire Wildlife Trust
- English Heritage
- Sport England
- The Theatres Trust
- Highways Agency
- Pendle Production Ltd

What you said

Pendle Production Ltd commented that culture attracts investment and it is only right that some of that investment should be used to propagate more cultural activity. Developers should be encouraged to put finance towards the cultural activities that will attract people to their developments.

Lancashire Wildlife Trust noted that there is no mention of the natural environment in this section, which seems at odds with the internationally important designations that apply to the coast (Ribble and Alt Estuaries Special Protection Area / Ramsar site), the Site of Special Scientific Interest / Local Nature Reserve / Biological Heritage Site dune system and the stated wish to promote the Ribble Coast and Wetlands Regional Park initiative and the Coastal Parkway Masterplan.

English Heritage welcomed the proposal to promote the classic resort initiative for St Annes. This concept needs to be defined within the Plan. English Heritage welcomed the proposal to regenerate the seafronts of Lytham and St Annes, but noted that there is no mention or assessment of the prominent historic environment in this proposal. The importance of the historic environment should be a key objective in this section as it is an important part of the local economy. Reference needs to be made to the Lancaster Canal, which runs through Fylde.

Sport England welcomed the reference in policy EC5 to sports facilities (leisure centres, swimming pools, golf courses). However, in accordance with paragraph 73 of NPPF, any policies relating to sports provision must be based on a robust and up-to-date needs assessment. For that reason, Sport England strongly advised including an additional policy(ies) for indoor and outdoor sport and linking policy EC5 of the Preferred Options document to that new policy in chapter 11.

The Theatres Trust is pleased to see that policy EC5 will protect existing cultural assets and will encourage daytime and evening leisure and cultural facilities in town centres.

The Highways Agency is generally supportive of locating leisure, cultural and tourism accommodation, in St Annes and Lytham, where their scale and cumulative impact is appropriate to the location. The Highways Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.

Council response

The comments made by Pendle Production Ltd, the Theatres Trust and the Highways Agency are noted.

In response to the comments made by Lancashire Wildlife Trust, the Council agrees to make reference in chapter 1 to the fact that the Local Plan should be read as a whole.

The Council agrees to include additional criteria in policy EC5 of the Preferred Options document which refers to environmental designations; the Ribble Coast and Wetlands Regional Park and the Coastal Parkway Masterplan.

The comments made by English Heritage relating to heritage assets, including Lancaster Canal, are dealt with under policy ENV5 of the Preferred Options document and the related supporting text in chapter 14.

In response to English Heritage's comments about the role of the historic environment in regenerating the seafronts of both Lytham and St Annes, the Council agrees to refer to the protection of heritage assets in the form of seaside resort facilities, in policy EC5 of the Preferred Options document.

The comments made by Sport England are noted. The Council agrees with Sport England over the need for an additional policy for indoor and outdoor sport in chapter 11 (Health and Wellbeing) and to link policy EC5 of the Preferred Options document to the new policy.

Recommendations for change

- Amend criterion b) of policy EC5 of the Preferred Options document to read: "Supporting the physical regeneration of Lytham and St Annes seafront area and the protection of seaside resort facilities, to maintain the hotel market and support wider tourism and the local economy".
- Amend criterion (e) of policy EC5 of the Preferred Options document to: "Protecting existing tourism, cultural, heritage and leisure assets, such as golf courses and the seaside resort facilities, with a view to helping them to adapt to new challenges."
- Add a new criterion h) to policy EC5 of the Preferred Options document which says: "Protecting the environmental designations (i.e. the Ribble and Alt Estuaries Special Protection Area / Ramsar site), and the Site of Special Scientific Interest / National Nature Reserve / Local Nature Reserve / Biological Heritage Site dune system) in accordance with policy ENV2".
- Add a new criterion i) to policy EC5 of the Preferred Options document which reads: "Promoting the Ribble Coast and Wetlands Regional Park initiative and the Coastal Parkway Masterplan".
- Add a new policy on indoor and outdoor sports facilities in chapter 11, and link policy EC5 of the Preferred Options document to the new policy.

Policy EC6: Leisure, Culture and Tourism Accommodation

Number of representations:

Comment	Support	Object	Total
1	2	1	4

Representations received from:

- English Heritage
- Environment Agency
- Highways Agency
- 1 Resident

What you said

A resident commented that policy EC6 is too weak in protecting existing holiday areas. Primary and secondary holiday area(s) should be maintained. The resident claimed that the enhancement of the night time economy could have both positive and negative effects on crime.

English Heritage welcomed the proposal to promote the classic resort initiative for St Annes. This concept needs to be defined within the Plan. English Heritage welcomed the proposal to regenerate the seafront of Lytham and St Annes, but noted there was no mention or assessment of the prominent historic environment in this proposal. The importance of the historic environment should be a key objective in this section as it is an important part of the local economy. Reference needs to be made to the Lancaster Canal, which runs through Fylde.

The Environment Agency supported avoiding the change of use of holiday sites to permanent residential use.

The Highways Agency was generally supportive of locating leisure, cultural and tourism accommodation in St Annes and Ribby Hall Village, where their scale and cumulative impact is appropriate to the location. The Highways Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.

Council response

The Environment Agency's and the Highways Agency's comments are noted.

Primary holiday areas are to be maintained in the Plan. Secondary holiday areas have not been maintained as the NPPF includes hotels within the definition of 'main town centre uses', which are subject to a sequential test.

The comments made by English Heritage relating to Lancaster Canal are dealt with under the re-drafted policy ENV5 of the Preferred Options.

The concept of the classic resort is set out under the re-drafted policy ENV5 of the Preferred Options document, together with a definition in the glossary.

In response to English Heritage's comments about the role of the historic environment in regenerating the seafront of both Lytham and St Annes, the Council agrees to refer to the protection of heritage assets in policy EC5 (b and e) of the Preferred Options document.

Recommendations for change

- None

Chapter 10 Housing

Chapter 10 Housing General Comments:

Number of representations:			
Comment	Support	Object	Total
5	0	2	7 ²¹

Representations received from:

- Highways Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- English Heritage
- BAE Systems Real Estate Solutions
- Ribby with Wrea Parish Council
- Councillor Eastham

What you said

Ribby with Wrea Parish Council commented that the Strategic Housing Land Availability Assessment (SHLAA) site maps which indicate assessed / possible development sites give the wrong impression to developers and only encourage unwanted planning applications; and it was recommended that they be removed from the final document as they are not necessary.

The Highways Agency considered that the Plan lacked a policy detailing the overall provision of housing (akin to policy EC1 for employment). Whilst it is appreciated that the majority of housing development will be directed towards the strategic locations, the Highways Agency would expect a housing policy which details the total provision across the authority and the intentions for phasing. The detail is provided in Appendix 3, however it was considered that it should be included as a policy intention to give greater certainty to the housing delivery strategy.

BAE Systems Real Estate Solutions commented that Section 10.2 should make reference to the Council's brownfield first policy as identified in Section 4.7 Objective 1: To create sustainable communities.

CPRE – Fylde District commented that a Fylde Borough Council Empty Homes Strategy should define a target number of empty homes per year to be brought back into use. This figure should be assumed to contribute to the annual housing supply.

English Heritage objected to paragraphs 10.13 and 10.14 because no assessment had been made of the historic environment or the different character areas in the Borough in Plan. English Heritage claimed that the Plan needed to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area.

²¹ Some respondents have submitted more than one representation for this section, therefore the number of representations does not match the number of respondents.

Cllr Eastham recommended that paragraph 10.34 – relating to Lifetime Homes and Community Self Build should be deleted as requiring 25% of all homes to meet lifetime homes standards is too onerous.

Council response

The maps showing land at strategic sites listed in policies SL1, SL2, SL3 and SL4 (inclusive) in chapter 7 do need to be included because, as set out in paragraphs 21 and 47 of the NPPF, a Local Plan must identify key sites which are critical to the delivery of local and inward investment and the housing strategy over the plan period.

The detail of when and where housing and economic development will be delivered is set out in policies SL1, SL2, SL3 and SL4 of chapter 7: Strategic Locations for Development.

Objective 1 in chapter 4 is not a policy and it does not state that brownfield land should be used first. It does refer to making the best use of brownfield land to reduce the loss of greenfield land.

Paragraph 51 of the NPPF says that Local Planning Authorities should identify and bring back into residential use empty housing and buildings in line with empty homes strategies. However, it does not go as far as saying that they should make a contribution to supply. The Council has an Empty Homes Strategy however, it does not contain a target for bringing Empty Homes back into use which could then be offset against new build completions. The resources are not available for the Council to be more proactive in bringing Empty Homes back into use.

Paragraphs 10.13 and 10.14 are not intended to be about the heritage of the area, but simply provide background information describing variety in the current stock and how the population is changing. The two paragraphs constitute background information in relation to the types of new housing that may be needed. More up-to-date evidence on the variety of house types and tenures and changes in the population is presented in the Fylde Coast Strategic Housing Market Assessment 2014 (SHMA), which provides evidence of what types of new homes are needed.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The requirement to build 25% of all homes to Lifetime Homes standards will be revisited as part of the viability testing of the plan. If the requirement is found to make development unviable and therefore undeliverable it will be deleted from the plan. In addition, the DCLG's review of Housing Standards and the results of the consultation which took place nationally in summer 2013, may result in the removal of Lifetime Homes standards.

Recommendations for change

- There may be changes to requirements for Lifetime Homes as a result of viability testing. Lifetime Homes standards may be removed nationally as part of the ongoing review of

Housing Standards, implemented by the Department for Communities and Local Government (DCLG). If this is the case, all references to Lifetime Homes should be removed from the Plan.

Policy H1 Density, Mix and Design of New Residential Development

Number of representations:			
Comment	Support	Object	Total
12	0	2	14

Representations received from:

- English Heritage
- Highways Agency
- United Utilities
- Sport England
- Lancashire Wildlife Trust
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Blackpool Council
- Councillor Eastham
- 6 Residential Developers

What you said

A developer commended the Council for taking a positive approach in seeking to provide appropriate accommodation to meet the needs of its ageing population, particularly within policy H1 and the accompanying justification to this policy in the Preferred Options document.

A developer objected to policy H1 of the Plan considering it to be unsound, claiming that it had not been positively prepared or justified with up-to-date or relevant evidence.

Density

A developer supported Fylde's approach to density, it is a sensible approach for a development to be reflective of its surroundings, and is consistent with the 5th bullet point of paragraph 47 of the NPPF. However, the developer considered that the Council needs to clarify what is considered to be 'good access' to public facilities and services, as there is no definition when setting a density requirement of 40-60 dwellings in these areas. The developer claims that this policy should be supported by a detailed viability assessment.

The Highways Agency supported the promotion of high density residential development at a minimum of 25 dwellings per hectare, especially within close proximity to existing centres, key transport nodes and facilities, as this will facilitate a reduction in the need to travel, particularly by private car. The Highways Agency welcomed the recognition that where

higher densities of 40-60 dwellings per hectare are proposed, the Council will seek to ensure there will be no unacceptable impact on the local transport infrastructure.

Policy H1 of the Preferred Options document expects higher densities (40-60 dwellings per hectare net or more) on sites with good access to public transport facilities and services, for clarity Blackpool Council asked whether this includes all strategic sites.

Sport England assumed that the use of the words 'open space' is a generic term that includes outdoor sport. If that is the case, then Sport England suggested rewording the third paragraph of policy H1 to say: "and that appropriate open space, sport and recreation provision can be provided in accordance with the findings of any adopted needs assessment."

A developer objected, claiming that the Local Plan fails to provide a justifiable reason within the background text why these densities have been chosen. A developer recommended that this part of policy H1 be amended with a realistic density.

A developer commented that policy H1 identifies a minimum density of 25 dwellings per hectare, with higher densities (40-60 dwellings per hectare) required in areas with good public transport. The NPPF permits the Council to set out its approach to housing density to reflect local circumstances, but this should be based upon credible evidence. Such a policy is thought likely to create conflicts with policy ENV6 criterion e) (i.e. the design policy in chapter 14 of the Preferred Options document), which requires densities to reflect the character of the surrounding area. A more flexible approach to density would be to ensure that the characteristics of individual sites are taken into account. The developer claimed that the 2008 SHMA is out-of-date.

Mix

A developer also requested that the phrasing in policy H1 referring to housing mix should be reworded to "a broad mix of dwelling types, sizes and tenures, including private rented and buy-to-let, will be appropriate on all large housing sites over 100 units" to reflect the demographics of the Borough as set out in the Fylde Coast SHMA, to ensure that developments continue to be viable to reflect the uncertainty of the market as the requirements in the SHMA may not always be attainable due to viability. BAE Systems Real Estate Solutions and a developer made a similar comment that the Local Plan policy does not need to be overly specific in this regard as long as a broad mix is provided as ultimately the market will decide what type of units are needed in a particular area. The developer also claimed that the SHMA was out-of-date.

Design

A developer commented that all homes should be built to Building Regulation Standards and not Lifetime Homes. This is in line with the NPPF (paragraph 96) which says that "any local building standards should adopt nationally described standards". Lifetime Homes create properties that are only partially suitable at different stages of need, not properties that are wholly suitable now, this creates issues of under-occupancy. The impact of this requirement on density has not been considered. The developer suggested that provision should be made for sustainable communities where people can create families and communities.

A developer wanted it noting that the extent to which these requirements will be viable when examining all other developer contributions, affordable housing requirements and emerging Community Infrastructure Levy costs will need to be fully explored and set out by the Council when progressing the Local Plan and Community Infrastructure Levy charging schedules.

United Utilities encouraged the Council to promote improvements in water efficiency through the design of all development which will reduce pressure on the supply of water and reduce

the impact on wastewater infrastructure, resulting in more sustainable development and assisting in improving bathing waters. All new homes will be expected to achieve the water efficiency target set out within Level 3 of the Code for Sustainable Homes. United Utilities also requested that an additional paragraph be included in the justification to policy H1 of the Preferred Options document.

Treales Roseacre and Wharles Parish Council suggested that to retain the character of rural areas, that the design of development in rural areas should incorporate outer boundaries composed of native hedging.

Lancashire Wildlife Trust commented that there is no mention of the ecology of the existing site or the need to enhance biodiversity as a result of any development. This is especially important given that most of the Strategic Locations identified for housing development contain ponds or adjoin Biological Heritage Sites (Site of Special Scientific Interest / Local Nature Reserve in the case of policy H5 – Isolated New Homes in the Countryside).

English Heritage commented that the NPPF requires that plan policies should contain a positive strategy for the conservation and enhancement of the historic environment. No assessment has been made in the Plan of the historic environment, it is a requirement of the NPPF that a proper assessment of the significance of heritage issues has been made.

Provision for All Ages

Cllr Eastham commented that reference to Community Self Build should be deleted from policy H1, and a developer suggested that the Council should not reserve the right to request contributions from community self-build schemes.

Council response

The Council will continue to take a positive approach to meeting the needs of its ageing population in particular by taking account of the evidence contained in the Fylde Coast Strategic Housing Market Assessment 2014 (SHMA). With respect to the relationship between density and accessibility, page 221 of the Preferred Options document sets out an Accessibility Questionnaire and higher densities will be expected on sites with a high accessibility rating. It is agreed that this should be explained more clearly in the policy.

On the strategic sites a density of 30 dwellings per hectare was used on 60% of the site area. However, the initial findings of the Viability Study are that these densities are too low and this is having a negative impact on Viability. It was not intended that the highest densities would apply to the strategic sites as although every effort will be made to improve their accessibility by public transport most of them are some distance from railway stations. Also they are all visible from surrounding countryside which is flat or gently undulating in character. Existing higher density development on the edge of Lytham and St Annes (Cypress Point) is highly visible from the surrounding countryside and may be inappropriate on the strategic sites. Densities on the strategic sites will be revisited using the new evidence of need for different types of dwellings (SHMA 2014) and the viabilities of different densities (Viability Study 2014). Densities will be adjusted to make sure that the Local Plan is deliverable, whilst protecting the landscape character of the countryside which surrounds the strategic sites.

Policy H1 of the Preferred Options document does not conflict with policy ENV6 on design, as ensuring densities of new residential development reflect the character of the surrounding area does mean the characteristics of individual sites would be taken into account.

The Council agrees with the suggested wording, proposed by Sport England, on sport and recreation provision in policy H1 of the Preferred Options document.

With respect to mix, there is a growing and evidenced need for housing for the elderly. The SHMA 2014, Wrea Green Housing Need Study and wider Rural Housing Needs Study all evidence this need. Fylde has a very small stock of small bungalows for the elderly to downsize to, more of this type of accommodation will be needed. The policy will be amended to reflect these needs and the viability of these requirements will be assessed.

The results of the Viability Assessment will be used to revisit the requirements in the design part of policy H1, of the Preferred Options document, and will be used to decide which requirements should remain in the policy.

The Government has amended the primary legislation to allow for water efficiency measures to be part of building regulations. Although, it has not happened yet, it is imminent. The ten point action plan for improving bathing waters asks for Code Level 3 for water efficiency. This Council is being asked to sign up to this now. The Council will continue to monitor this and will only include it in the Local Plan if it is not included in the Building Regulations.

The NPPF contains detailed information on design and the Council was strongly advised at the time of drafting the Preferred Options document not to repeat it in the Local Plan. In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan against which applications for new housing can be assessed. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be done.

Comments in relation to nature conservation (biodiversity) considerations and new development are dealt with in chapter 14. Comments in relation to the historic environment are dealt with under the re-drafted policy ENV5, in chapter 14 of the Preferred Options document.

The Government is promoting Community Self Build as a way of helping people to build their own homes. These schemes should not be made unviable by the Council requesting developer contributions.

Recommendations for change

- Policy H1 of the Preferred Options document will be amended as a result of the SHMA 2014 and the Viability Assessment 2014.
- Policy H1 of the Preferred Options document will be amended to specify the relationship between the accessibility score and density.
- Amend the third paragraph of policy H1 of the Preferred Options document to say: “... and that appropriate open space, sport and recreation provision will be provided in accordance with the findings of any adopted needs assessment and car parking will be provided.”

Policy H2: Conversions and Changes of Use to Residential**Number of representations:**

Comment	Support	Object	Total
1	0	1	2

Representations received from:

- Highways Agency
- A Developer

What you said

The Highways Agency commented that the conversion of a site from employment purposes to housing, would bring with it different patterns of travel, that could have differing implications, including at the strategic road network. Such considerations would need to be fully considered including with reference to any influence such as at the strategic highway network.

A developer objected to the restriction of residential conversion of redundant buildings to only where there is an identified need for additional housing. The NPPF clearly promotes sustainable development and bringing vacant and under-used buildings back into productive use, there is therefore no justification to identify a housing need as a pre-requisite. The developer claimed that if the Council are concerned about the specific loss of employment premises, then this should be dealt with by way of an employment policy and not a general restriction on the conversion of redundant buildings.

Council response

The Council is in continuing dialogue with the Highways Agency in relation to the Infrastructure Delivery Plan. Paragraph 51 of the NPPF refers to conversions and does not mention the strategic road network. Paragraph 32 final bullet in the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The NPPF takes a more permissive approach to development than previous guidance.

The Council considers there should be a new policy on highways impact and design in the General Development chapter (chapter 8).

Paragraph 51 of the NPPF says 'They should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate'.

Recommendations for change

- Add a new policy (i.e. policy GD6) to chapter 8 on highways impact and design.

Policy H3 Affordable Housing

Number of representations:			
Comment	Support	Object	Total
10	0	205	215 ²²

Representations received from:

- Kirkham Town Council
- Ribby with Wrea Parish Council
- Kirkham Grammar School
- Blackpool, Fylde and Wyre Trades Union Council
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors
- The Minority Group Report
- 5 Residential Developers
- 199 Residents

What you said

Percentage of Affordable Housing

Kirkham Grammar School commented that in the case of residential development of the grammar school off-site playing fields, the existing playing field will need to be replaced to meet the requirements of the NPPF and the relevant emerging Local Plan policy (policy ENV2 in chapter 14). This may affect the viability of the Kirkham Grammar School site as a housing development with 30% affordable housing. Kirkham Grammar School suggested that this should be explored at the appropriate time.

Blackpool, Fylde and Wyre Trades Union Council welcomed new homes being made available for people, however, enough social housing should be included in the plan to take account of local need and the quite dramatic drop in the proportion of owner occupiers over recent years.

A developer believed that the affordable housing policy as currently structured is sound given the flexibility provided by the mechanism to permit viability testing enabling a development to still be permissible if it can be demonstrated that the level of affordable housing required cannot be met at risk of the sites delivery.

Three developers commented that there is a lack of justification for the requirement for 30% affordable housing; that the Council is relying on out-of-date evidence and there has been no Viability Testing.

A resident objected because the figures for affordable housing had not been fully defined and there is widespread concern that the figures will only be disclosed just before the Local Plan goes to the Secretary of State for approval, therefore without consultation. The resident claimed that this was devious and undemocratic.

Distribution of Affordable Housing

Ribby with Wrea Parish Council commented that affordable housing should not be forced on rural areas where there is not a quantifiable local need. As such, housing development

²² Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

should not be approved merely to fund affordable housing elsewhere and all towns and villages must accept their fair share as assessed by local need.

Fylde Liberal Democrats would like to see affordable housing provided in the same settlement as any proposed housing development. Developers should not be able to create a situation where they are built elsewhere creating affluent / less affluent enclaves within the borough.

The Minority Group Report suggested the provision of affordable housing should be to meet the need of the settlements and not the whole borough. The Group objected to the provision of affordable housing in Kirkham, Wesham and Warton.

Numerous residents commented that the second paragraph of policy H3, 'Affordable Housing' in the Preferred Options document, should be altered to read "the provision of affordable housing will be to meet the need / requirement identified for those settlements". The existing wording says that affordable housing will be located in Kirkham, Wesham, Freckleton, Lytham and St. Annes, as there is no housing allocated in Freckleton and developers in Lytham and St. Annes attempt not to build social housing within their developments and instead give cash equivalents to provide social housing elsewhere in the Borough. Residents consider that Kirkham and Wesham will take greater numbers of this type of housing, which they claim is poor planning and will affect the balance of housing provision within communities. Numerous residents made a very similar comment except that they said that Warton will have to take greater numbers of this type of housing.

Another group of residents requested that the second paragraph of policy H3 be deleted and commented that it is not acceptable to distribute affordable housing to Warton and Freckleton to meet the affordable housing needs of Lytham and St Annes, Blackpool and Kirkham. The residents claimed the most urgent need being for affordable housing to be located in mixed developments in those large urban areas.

There is a need for more affordable family housing particularly in Lytham and St Annes (source: Fylde Local Plan to 2030: Part 1 Preferred Options Local Plan Strategic Environmental Assessment and Sustainability Appraisal pp19). Residents claimed that policy SL4 in chapter 7 does not address this need, but policy SL1 could.

A developer commented that given the size and potential of Little Singleton, it should be included in the third paragraph of policy H3 as it has the potential for residential development which will then assist with meeting the affordable housing requirement of the settlement.

A developer objected to policy H3 and recommended that the third paragraph be open to interpretation; they recommended that the requirements are clearly stated and justified for each of the settlements within the policy or that part of the policy is deleted.

Further Expectations

A developer supported the recognition by the council that the requirements for tenure, size and type of affordable housing should be negotiated on a case by case basis taking account of viability and local need. However, two developers commented that the inclusion of expectations on size of social rented properties and the amount of Lifetime Homes is overly prescriptive and should be deleted.

A developer commented that the requirement for 30% affordable homes and tenure, alongside 25% Lifetime Homes Standards will need to be assessed as part of the Council's CIL Charging Schedule.

Council response

The SHMA 2014 concludes there is a net annual affordable housing need of 207 dwellings. The requirement for 30% affordable housing on developments of 15 homes or more has been Viability tested.

There is a need for affordable housing throughout Fylde Borough. Need is higher in the urban areas e.g. Lytham and St Annes but there is need for affordable housing in Kirkham and Wesham and Freckleton and Warton as well as on the Fylde-Blackpool Periphery. The plan includes all of the land that can be allocated at Lytham and St Annes so it will maximise the amount that can be provided there and the rest will need to be provided at the strategic sites adjacent to the other settlements. The Council's duty is to meet the needs of its residents on a borough wide basis. Kirkham and Wesham and Freckleton and Warton are second tier settlements (local service centres), they are built up urban areas and are readily distinguishable from the rural villages. The market housing and affordable housing needs of the Borough will be addressed by all of the urban areas. Land allocated on the edge of these settlements will be included within settlement boundaries once allocated and is not rural.

Section 106 Agreements are drawn up to ensure the money is usually spent on providing affordable housing in that settlement. The amount of affordable housing provided will continue to be assessed on a site by site basis with the Viability of the development being the determining factor. For example, a lower proportion of affordable homes has been agreed on the GEC Marconi site at Warton because of the high cost of remediating contaminated land. If a lower proportion had not been agreed, development of the site would not have gone ahead, it is important to deliver brownfield sites in order to reduce the amount of greenfield allocations included in the plan. At Richmond Avenue in Wrea Green, 8 affordable units were provided because the Wrea Green Housing Need Study had concluded that only 8 were needed in Wrea Green. The commuted sum went into a pot to be spent anywhere in the Borough. It is important that this money is collected and spent on affordable housing as there is a high need borough wide. The Blue Anchor development at Greenhalgh did not provide any affordable housing or commuted sum as it was demonstrated that this would make the development unviable. Applications will continue to be assessed on a site-by-site basis, affordable housing will continue to be provided where it is viable and if needed, at that settlement.

All of the strategic sites e.g. those listed in policies SL1 to SL4, inclusive, in chapter 7 are needed to meet the requirement for new homes.

Little Singleton is not included in the third paragraph of policy H3. The reference to Singleton does not mean Little Singleton.

The council is working on a programme of Rural Housing Need Assessments, Wrea Green and Singleton have been finished, the rest of the Borough apart from Lytham and St Annes is about to be written up and published in the Rural Housing Needs Survey 2014.

Emerging evidence from the SHMA 2014 and the Viability Study will be used to amend policy H3.

Recommendations for change

- New evidence from the SHMA 2014 and the Viability Study will be used to amend policy H3 of the Preferred Options document.

Policy H4 Gypsies, Travellers and Travelling Showpeople's Sites
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Number of representations:			
Comment	Support	Object	Total
4	0	5	9 ²³

Representations received from:

- Wyre Council
- Blackpool Council
- National Farmers Union
- The Traveller Movement
- A Planning Consultant
- 3 Residents

What you said

General Comments

Wyre Borough Council commented that the Local Plan's approach to travellers with a criteria based policy in Part 1 and Site Allocations in Part 2 is in line with the approach proposed by Wyre.

The Traveller Movement requested that the ethnic identity of Gypsies and Travellers should be respected, and the words always referred to with an initial capital letter.

The National Farmers Union would hope to see that there is provision of adequate land for the associated livestock so as not to cause a negative impact on the local community with issues of fly grazing.

Two residents objected to the inclusion of any wording with respect to Gypsy and Traveller sites in the Local Plan.

A resident requested that residents adjacent to proposed Gypsy and Traveller sites are given as much notice as possible so that they can sell their homes.

Policy H4

Blackpool Council supported policy H4 as it will allow for the assessment of proposals that come forward for unexpected need, however it is not clear from the policy whether the proposed criteria will also be used to guide land supply allocations as part of the proposed site allocations document if a need is identified as part of an updated GTAA. They suggested that the policy could clarify if policy H4 will be applied to guide land supply allocations (where appropriate), as set out in 'Planning Policy for Traveller sites', in addition to determining planning applications for new sites and extensions to existing sites.

The Traveller Movement also commented on the criteria in policy H4: claiming that criterion e) may be too restrictive given high land costs in or adjacent to settlements, and the preference of many Gypsies and Travellers to be a little away from other development. The

²³ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

Traveller Movement suggested amending the initial section to: “The site would be within or accessible to...”

Criterion f) the 2005 Good practice guide is what it says, and will not be appropriate to all circumstances. The issue of location and design is addressed by criterion d) and the first half of criterion f) is unnecessary.

Criterion h) implies that only sites with the mixed use potential should be supported. The Traveller Movement suggested that criterion h) should be reworded to indicate that mixed use proposals would be welcomed, but would not be required.

A Planning Consultant objected to policy H4 and said that it is not PPTS / NPPF compliant. The consultant claimed that it is a criteria based policy which fails to identify levels of need and fails to identify suitable sites or broad locations for sites. The consultant considered it regrettable that no options were included at the Issues and Options stage however, the fact that a policy is included was supported.

Policy H4 was considered to be unduly onerous as it requires 9 criteria to be satisfied. Objections were raised to all criteria as follows:

- a) Stipulation that there must first be need is contrary to paragraph 22(d) of Planning Policy for Traveller Sites (2012).
- b) Is not Framework compliant, sites can be permitted if other material considerations support provision.
- c) Does not allow sequential and exception tests for sites in Flood Risk Zone 2.
- d) Will be relied upon to refuse every application.
- e) Should not require all settlements to provide all of these services, change to most if not all. What noise and air quality issues do you have in Fylde?
- f) The guidance is dated 2008 and paragraph 1.13 makes it clear it was not intended for private sites but was drafted to inform socially provided sites, it does not address the needs of showmen sites.
- g) i) repeats g) does it really add anything?
- h) Only applies to showpeople, few if any gypsies operate mixed use sites.

A task list of a further 12 actions was included in order to make the policy sound.

Justification and Evidence

Blackpool Council welcomed the reference to joint working in order to provide for the accommodation needs of Gypsies, Travellers and Travelling Show People. Blackpool Council considered paragraphs 10.59 and 10.60 should be updated to reflect the proposed Fylde Coast Gypsy and Traveller Accommodation Assessment.

The Traveller Movement commented that paragraph 10.59 indicates that an up-to-date needs assessment has been carried out, however, it is a source of concern that the Council has not defined targets for additional provision. Planning policy for traveller sites indicates that ministers expect this to have been done by March 2013. The level of unauthorised development in the area and the shortage of accommodation across Lancashire suggest there is an unmet need and to be legally compliant and sound the submission version of the Local Plan will need to set targets and identify a supply of deliverable sites and broad areas for growth. The Planning Consultant commented that the 2007 study did not address showpeople or need to 2030, it cannot be relied on and it was not available on the Council's website.

Council response

General Comments

The Local Plan will be amended so that the words Gypsies and Travellers are always referred to with an initial capital letter. There is a legal requirement for the Council to meet the accommodation needs of Gypsies and Travellers in their area, therefore this will continue to be included in the Local Plan. Residents will be consulted on the inclusion of sites in the Local Plan (Part 2). With respect to fly grazing, it is not possible for the Council to request that adequate grazing land is provided as this is not covered by planning legislation.

With respect to Blackpool's comments, paragraph 10.60 makes it clear that policy H4 of the Preferred Options document should be used in a positive way for the provision of plots and pitches. The subsequent Local Plan Part 2: Site Allocations to 2030 document will allocate the location of specific sites. It is likely that the policy will be used to select suitable sites and this will be made clear in the justification.

Policy H4

Policy H4 in the Preferred Options document was drafted in accordance with advice from the Planning Advisory Service. The whole Local Plan was read and the council was advised that it was NPPF compliant.

With respect to the Traveller Movement's comments, criterion e) will not be amended in the way suggested as "accessible" is open to interpretation and allowing development away from settlements is unsustainable. Criteria d) is about the location of the site and its external appearance i.e. landscaping, f) concerns the internal spaces, layout etc, they are both necessary. Criterion h) says 'should have the potential', this is in line with the NPPF which promotes mixed use sites.

With respect to the Planning Consultants comments, policy H4 (on its own) was never considered to be sound and compliant with the guidance. Paragraph 10.60 makes it clear that subsequent Local Plan Part 2: Site Allocations to 2030 document will allocate the locations of specific sites based on an updated study of need. With respect to the criteria in the policy:

a) Paragraph 22 of Planning for Traveller Sites states the following:

1. Local planning authorities should consider the following issues amongst other relevant matters when considering planning applications for traveller sites:

- the existing level of local provision and need for sites*
- the availability (or lack) of alternative accommodation for the applicants*
- other personal circumstances of the applicant that the locally specific criteria used to guide the allocation of sites in plans or which form the policy where there is no identified need for pitches/plots should be used to assess applications that may come forward on unallocated sites*
- that they should determine applications for sites from any travellers and not just those with local connections.*

That is, the first consideration is the existing level of local provision and need for sites. The Council does not know yet whether there is an identified need in any specific locality and that is why it has included criteria.

a) The policy is intended to assess applications that come forward on unallocated sites.

- b) The Council has decided not to allocate any land in the Green Belt for development. Recent guidance and decisions have supported criterion b).
- c) The Council has decided not to allocate any land in Flood Risk Zones 2 or 3. There is plenty of land which is not in Flood Risk Zones that should be considered before areas at risk of flooding.
- d) This criterion will not be used to refuse applications. It will simply be used to improve the quality of applications. The Council has recently been minded to approve a site at Newton, however, the decision has been called in.
- e) All of the Council's housing sites are adjacent to settlements which provide all the infrastructure listed, Gypsies and Travellers will need all of these services too. BAE Systems Real Estate Solutions is located in Fylde they test Eurofighter jet engines at Warton, test flights are also very noisy. The existing Local Plan safeguards some areas from development because they are near the runway. The M55 Junction 3 can suffer from congestion as can the A585T.
- f) The date of the Good Practice Guidance will be amended and the wording of the policy amended to make it clear it does not apply to showmen's sites.
- g) Criterion g) is included because in Fylde there are settlements where there are large numbers of residential caravan sites which result in the settlement being far larger than is sustainable for its remote location. Criterion l) is about the local services and infrastructure being sufficient to cope with any extra demand from Gypsies and Travellers – these issues would be considered for any residential development.
- h) Many of the Gypsies in Fylde (on the edge of Blackpool) do operate mixed use sites, in particular many of them keep horses and run Landeau businesses. Extra land is needed for this and it is sustainable to include this as a mixed use, live work unit.

Justification and Evidence

With respect to evidence, the situation has changed considerably since the Preferred Options document was drafted in November 2012. At that time, the Fylde Coast Authorities were investigating whether the Salford University Study could be updated. The Councils met on several occasions throughout the summer of 2013 and decided to jointly commission a new Fylde Coast Gypsy and Traveller Accommodation Assessment. Consultants were appointed and work is underway and due to be completed in Summer 2014. The consultants have contacted the Gypsy and Traveller Movement and also the Planning Consultant who made responses to the Preferred Options consultation. The study follows a recognised methodology and involves interviewing Gypsies, Travellers and Travelling Showpeople. It will provide an objective assessment of the need for pitches and plots for each Local Authority (Blackpool, Fylde and Wyre) to 2030. The results of the study will be used to inform the redrafting of this part of the Local Plan.

Recommendations for change

- Amend the Local Plan so that the words Gypsies and Travellers are always referred to with an initial capital letter.
- Amend policy H4, criterion f) of the Preferred Options document, CLG 2008 also make it clear that Criterion f) does not apply to Travelling Showpeople Sites.

- Amend the Gypsies, Travellers and Travelling Showpeople’s section of the Local Plan to reflect the findings of the Gypsy and Traveller Accommodation Assessment 2014.

Policy H5 Isolated New Homes in the Countryside

Number of representations:

Comment	Support	Object	Total
1	2	1	4

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- English Heritage
- Campaign to Protect Rural England (CPRE) – Fylde District
- A Developer

What you said

Treales, Roseacre and Wharles Parish Council asked: what is the Definition of a Rural Worker?

CPRE – Fylde District commended this policy for the restrictions they place on impacting on the rural landscape of the Borough. The policy should state the applicable designations: Countryside and Green Belt.

English Heritage welcomed the inclusion of conversion and re-use of heritage assets within this policy.

The developer referred to paragraph 55 of the NPPF which clearly states that new isolated homes in the countryside can also be acceptable when the development would re-use redundant or disused buildings and lead to an enhancement of the immediate setting. The developer suggested that policy H5 of the Preferred Options document should therefore be amended to reflect NPPF paragraph 55 if it is to be sound.

Members Decision

Should the Council define 'rural worker'? If so, the definition needs to be broad and not classify particular occupations. Defining what is classed as an essential need. The NPPF is clear in that it no longer retains the traditional definition.

Members agreed at the LDSC meeting on 10th June 2014 that there should not be a

Council response

A rural worker is someone who has an "essential need ... to live permanently at or near their place of work in the countryside", (paragraph 55 of the NPPF).

The title of policy H5 in the Preferred Options document is 'Isolated New Homes in the Countryside', as such it is not necessary to mention the words Green Belt.

Policy H5 in the Preferred Options document includes a reference to the re-use of redundant buildings and enhancement of the immediate setting at 2b). Consequently, no further change is necessary.

Recommendations for change

- None

Policy H6 Replacements of, and Extensions to, Existing Dwellings in the Countryside

Number of representations:

Comment	Support	Object	Total
2	1	1	4

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- Lancashire Wildlife Trust
- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 Developer

What you said

Treales, Wharles and Roseacre Parish Council advised that the text be reviewed with a legal opinion to ensure that there is no ambiguity of the expansion (e.g. what does an integral garage / workshop mean – one that is attached by one wall and / or one that fits within the footprint [partially or completely] of a two storey or more dwelling) and the baseline by which it is referenced. This has been a matter of significant ambiguity for developer, consultee, officer and borough councillor.

CPRE – Fylde District commended this policy for the restrictions it places on impacting on the rural landscape of the Borough. The policy should state the applicable designations: Countryside and Green Belt.

Lancashire Wildlife Trust commented that there is no mention of the existing ecology of the site to be expanded on by a possible 25% increase in dwelling size. The Wildlife Trust claimed that paragraph 21 of the NPPF applies.

A developer objected saying that the restriction of extensions to 25% of the ground floor area of the existing dwelling is an entirely arbitrary figure with no justification and is considered too low. The policy should also allow a degree of flexibility so that each case can be considered on its own merits.

Council response

The Council agrees to set out the definition of an integral garage in the Local Plan. Policy H6 in the Preferred Options document is entitled 'Replacements of, and Extensions to, Existing Dwellings in the Countryside', and it is therefore not necessary to mention the words Green Belt.

The policy was specifically drafted to deal with the issue of small traditional dwellings being replaced by much larger modern homes. The policy has deliberately been worded so that it cannot be open to interpretation.

In answer to the Wildlife Trust's comments, the Council considers it necessary to draft a separate policy on nature conservation (biodiversity). Policy ENV1 will focus entirely on landscape issues. The new policy on nature conservation (biodiversity) in chapter 14, will set out the hierarchy of nature conservation designations, species and habitat protection and enhancement. The Wildlife Trust refers in their submission to paragraph 21 of the NPPF, but this paragraph in the NPPF relates to investment in business and not to nature conservation issues.

Recommendations for change

- Add the following definition of an integral garage in the Glossary: "An integral garage is a building for parking vehicles, attached to another building, such as a house. Typically,

integral garages have three walls, a roof and a door opening large enough for vehicles to enter the building. Select integral garages also have doorways from the garage to the connecting building.

Chapter 11: Health and Wellbeing

Policy HW1: Health and Wellbeing

Number of representations:			
Comment	Support	Object	Total
3			3

Representations received from:

- Environment Agency
- Sport England
- BAE Systems Real Estate Solutions

What you said

BAE Systems Real Estate Solutions suggested guidance as to when a full Health Impact Assessment (HIA) may be required (i.e. the thresholds) and what may be expected within an HIA would be useful in the policy supporting information.

Sport England suggested that it was not clear from the wording of part b) what is meant by new facilities and that clarification is required. Does this also include indoor and outdoor sports provision? If it does then part c) could be contrary to paragraph 74 of the NPPF. If developers contributions are sought for where housing results in a shortfall or worsening of provision of a sports facility then this is in direct conflict with the criteria of paragraph 74. This says no loss unless it is clearly demonstrated to be surplus to requirement, or is replaced. This would also be in direct conflict with Sport England policy, which largely reflects the criteria of paragraph 74 of the NPPF.

The Environment Agency felt that it was important that the remediation of contaminated land is incorporated into an appropriate policy, either Local Plan Part 1 or Part 2. If this is within Part 1, this may be appropriate in policy HW1 and policy CL1 in relation to the risk to human health and controlled waters from land contamination. (The Environment Agency claimed that NPPF paragraphs 121-122 only relate to land quality and not land contamination).

Council response

Lancashire County Council is currently exploring the provision of a Health Impact Assessment (HIA) template and guidance document. Reference to future guidance and the HIA template will be provided within the policy justification.

The Council agrees with Sport England that clarification is required over the wording in parts b) and c) over what is meant by new facilities. New facilities actually refers to the provision of healthcare, as set out in part a). The Council will amend the text to refer to healthcare facilities in both parts b) and c).

The Council agrees with the Environment Agency that it is important for the remediation of contaminated land to be dealt with in an appropriate policy. It is considered appropriate to devise a new policy dealing with contaminated land, together with supporting text.

The Council agrees with Sport England for a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11).

Recommendations for change

- Amend part b) of policy HW1 to read: "... identifying sites for new healthcare facilities reflecting the spatial distribution ..."
- Amend part c) of policy HW1 to read: "... towards new or enhanced healthcare facilities from developers ..."
- Add the following sentence at the end of paragraph 11.15 of the Preferred Options: "Lancashire County Council is currently exploring the provision of a Health Impact Assessment (HIA) template and guidance document".
- Add a new policy on community facilities in chapter 11 (the Health and Wellbeing chapter).
- Add a new policy on contaminated land constraints, with accompanying supporting text, in chapter 11.

Chapter 12: Infrastructure, Service Provision and Transport

Chapter 12 General Comments:

Number of representations:			
Comment	Support	Object	Total
3	1	0	4

Representations received from:

- Wyre Borough Council
- Lancashire County Council
- Blackpool, Fylde and Wyre Trades Union Council
- Mobile Operators Association

What you said

Wyre Borough Council considered that the Local Plan and Infrastructure Delivery Plan must address the infrastructure constraints in the Borough so as to ensure that the development needs are delivered in a timely and co-ordinated manner.

The Mobile Operators Association suggested that a telecommunications policy is needed in the Local Plan. The Association said that telecommunications plays a vital role in the economic and social fabric of communities, and that this is recognised in the NPPF.

Blackpool, Fylde and Wyre Trades Union Council claimed that it is essential that there are services to support new housing, and that great care is needed to get this part of the Plan right.

Lancashire County Council supported the planned growth in Warton as it will complement the County Council's economic ambitions for the Enterprise Zone located at the BAE Systems site which is seeking to attract advanced engineering and manufacturing employment into the area. The County Council went on to say that given the existing size of Warton, it will be necessary to provide significant increased levels of infrastructure and service provision in order to ensure a sustainable form of development.

Council response

The Infrastructure Delivery Plan, which will include the Infrastructure Schedule and the Regulation 123 list, will assess what social, transport, energy and green infrastructure and services will be required to support the development and accommodate all of the growth proposed in the Local Plan, including details of costs, funding and delivery.

The Council considers that there is no need to include a policy on telecommunications in the Local Plan as all of the requirements for the development of new telecommunications equipment are covered comprehensively in paragraphs 42 to 46 inclusive of the NPPF. The Council does not wish to prepare a policy for the Local Plan which would simply duplicate the guidance and advice provided in the NPPF.

In terms of Lancashire County Council's comments on the planned growth in Warton, it is noted that much of this infrastructure and service provision required relates to County Council functions.

Recommendations for change

- None

Policy INF1: Service Accessibility and Infrastructure

Number of representations:

Comment	Support	Object	Total
11	2	47	60 ²⁴

Representations received from:

- Ribby with Wrea Parish Council
- Blackpool Council
- Lancashire County Council
- BAE Systems Real Estate Solutions
- Environment Agency
- Highways Agency
- Sport England
- Home Builders Federation
- National Union of Teachers – Fylde Association
- United Utilities
- Holy Family Catholic Primary School
- 46 residents
- 2 residential developers

What you said

A resident suggested that part (a) of the policy is subjective and therefore not enforceable. Numerous comments were submitted recommending the deletion of this part of the policy and its replacement with a criterion that prohibits development where existing infrastructure is inadequate, with no realistic prospect of the infrastructure being improved. Residents were concerned that infrastructure solutions should not rely on pumped sustainable drainage systems.

Two residents suggested that the 2021 completion for the M55 link road (the Preston Western Distributor road) at Bartle in north west Preston is optimistic, and that development at Warton will have taken place before this road is completed; that if the Warton bypass goes ahead, there will be no money left to fund extra services in Warton; that there is no firm

²⁴ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

commitment to improve the flood defences; that there is no firm commitment to improve utilities infrastructure; and that the Local Plan does not address the issues that arise from increased traffic.

BAE Systems Real Estate Solutions supported the provision of a new secondary school within Warton, as this will benefit existing residents and will create a more sustainable community within the enlarged settlement.

Two residential developers claimed that there is little mention of the case for a new secondary school in the plan. Some residents questioned why the school is proposed at Warton when the need is in Lytham St Annes, whilst others suggested that a new school would detrimentally impact upon existing schools. Some residents said that a new secondary school at Warton will put pressure on existing infrastructure. One resident claimed that ONS statistics show a fall in the number of children, therefore a new secondary school is not required in the Borough.

The Holy Family Catholic Primary School raised concerns that there is no mention of a requirement for primary schools in the plan, adding that the school has few places available to accommodate children and their families moving to the area. They asked whether there should be plans to extend or develop the current schools in Warton to provide sufficient primary school places for the new children to the area.

The Highways Agency were generally supportive of the approach proposed for the delivery of new and improved infrastructure. The Environment Agency strongly supported this policy, along with the proposed phasing to coincide with improvements to the sewage network, and that this will ensure that new development does not detrimentally impact upon bathing water quality objectives.

United Utilities suggested the following amended wording for Policy INF1:

“New development will be required to provide essential site service and communications infrastructure and demonstrate that it will support infrastructure requirements as set out in the Infrastructure Delivery Plan.

In order for Fylde to protect and create sustainable communities, proposals for development should:

e) In considering development proposals, it may be necessary to co-ordinate the timescales for delivery of development with the timescales for the delivery of infrastructure. For large development sites, which may be constructed over a number of years and by various developers, it will be necessary to ensure a co-ordinated and holistic approach to the delivery of infrastructure, especially drainage infrastructure through the requirement for site wide strategies which establish principles to be adhered to during the construction process.”

Blackpool Council suggested that an additional new school is needed on the edge of Blackpool and that Blackpool Council and Lancashire County Council are in discussion over potential sites. They recommended that reference be made in the Local Plan to a new school in this area.

Sport England would have expected to see a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11). As many community facilities are also sports facilities, Sport England would expect the delivery to be based on the findings of an Indoor Sports Strategy.

The Home Builders Federation and a resident claimed that the policy is unsound because there has been no assessment of viability.

Council response

Part (a) of the policy is strategic in that the strategic locations identified in the Preferred Options document have been assessed against their sustainability, including infrastructure capacity. Although Warton is deficient in terms of some infrastructure and services, the area benefits from the Lancashire Enterprise Zone at BAE Systems, Warton, the proposed link road (the construction of the Preston Western Distributor) to a new junction 2 on the M55, near Bartle and its close proximity to the wastewater treatment works at Clifton Marsh.

The Infrastructure Delivery Plan will set out, as far as possible, the infrastructure and services that are required to support the Local Plan. The draft Infrastructure Delivery Plan is currently being amended and will be re-issued when the Council consults on the Publication version of the Local Plan.

Comments regarding secondary school provision are noted. The Council has set up the Fylde Education Liaison Group and is working closely with staff at the Local Education Authority at County Hall, who are evaluating the possible need and location for an additional secondary school in Fylde, together with potential extensions to the existing primary schools.

Lancashire County Council has undertaken an assessment that shows the estimated yield of primary and secondary school pupils for each of the strategic sites. This includes the overall additional primary forms of entry that would be required. It is anticipated that the Infrastructure Delivery Plan will detail the results of this assessment along with costs of provision and funding sources. The Council will publish Lancashire County Council's sequential assessment of potential sites for a new secondary school on the Council's website.

The Council acknowledges that an additional new primary / secondary school is needed at the edge of Blackpool, and the Council will make reference to this in the Infrastructure Delivery Plan. The Council will also consider whether reference should also be made in the Local Plan (Part 1).

The Council is in discussions with Lancashire County Council's Education Department regarding requirements for possible new and/or extensions to existing primary schools in Warton and to Fylde in general, to provide sufficient primary school places for the new children to the area.

The Council will amend the wording in policy INF1 as suggested by United Utilities.

A viability study of the Local Plan Preferred Options document has been undertaken which takes account of the 2012 Local Housing Delivery Group guidance on 'Viability Testing of Local Plans.' The Viability Assessment of the Local Plan – Preferred Options document is summarised in the appendices of this consultation statement. Further viability testing will take place on the Local Plan before the Publication version is issued.

The Council will amend the reference to "Fylde-Blackpool Periphery" in part (e) of policy INF1.

The Council agrees with Sport England for a separate policy on community facilities within the Health and Wellbeing chapter (chapter 11).

The Council agrees to amend the definition of community facilities in the policy to mirror the amended definition in the glossary.

Recommendations for change

- Amend policy INF1 (e): “e) In considering development proposals, it may be necessary to co-ordinate the timescales for delivery of development with the timescales for the delivery of infrastructure. For large development sites, which may be constructed over a number of years and by various developers, it will be necessary to ensure a co-ordinated and holistic approach to the delivery of infrastructure, especially drainage infrastructure through the requirement for site wide strategies which establish principles to be adhered to during the construction process.”
- Amend the reference to community facilities in policy INF1 to read: “Development proposals for new community facilities, which provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community, should be co-located where possible, providing mixed uses and a range of services in one sustainable and accessible location.”
- Include a reference to a new secondary school for Fylde, location yet to be determined, in the Infrastructure Delivery Plan.
- The Council will publish Lancashire County Council’s sequential assessment of potential sites for a new secondary school on the Council’s website, once the information has been received.

Policy INF2: Developer Contributions**Number of representations:**

Comment	Support	Object	Total
3	4	3	10

Representations received from:

- Environment Agency
- Highways Agency
- Home Builders Federation
- Lancashire Wildlife Trust
- Sport England
- United Utilities
- Pendle Production Ltd
- 3 residents

What you said

The Home Builders Federation suggested that if the Council adopts a Community Infrastructure Levy, policy INF2 will need to explain that any funds received through Section 106 agreements will relate solely to the requirements necessary to make the development acceptable in planning terms; be directly related to the development and be fairly and reasonably related in scale and kind to the development.

Pendle Production Ltd commented that the Local Plan gives an over-emphasis to sporting provision without balancing the cultural needs of the community. They considered that

developers should be encouraged to contribute towards cultural activities, as this can increase well-being and community cohesion.

A resident suggested that the Plan should protect the Council against land banking; that the Plan informs developers that housing numbers will be adjusted downwards for each year the promised build numbers are not met by the developer; and that developers failing to build should be made to resubmit applications.

Two residents claimed that Warton residents have no confidence in this policy. The residents said that there has recently been significant growth at Warton, but that there is no evidence that the infrastructure in this policy is being provided, apart from affordable housing and grass.

The Lancashire Wildlife Trust supported part (e) of policy INF2 in relation to green infrastructure.

Sport England welcomed the inclusion of outdoor sports facilities in part e) of policy INF2.

The Environment Agency strongly supported the inclusion of flood prevention and sustainable drainage measures in policy INF2.

United Utilities suggested the following amended wording for Policy INF2:

“The types of infrastructure that developments may be required to provide contributions towards include, but are not limited to:

b) Flood prevention and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage systems (see policy CL1);”

The Highways Agency were generally supportive of securing developer contributions, particularly through the Community Infrastructure Levy to ensure contributions are made towards the cost of transport infrastructure to mitigate the adverse impacts of new development. They also suggested that there should be no reliance on the blue route when assessing the impact of the Local Plan on the strategic road network, as the route is uncertain.

The Home Builders Federation claimed that policy INF2 is unsound because there has been no assessment of viability.

Council response

The Government’s policy tests on the use of planning obligations is set out in Circular 5/05 and therefore does not need to be repeated in the Local Plan.

The Council will make reference to “culture” in part (d) of policy INF2.

The Council agrees to rationalise the definition of community facilities in part (d) of policy INF2 to refer to the amended definition in the glossary.

The Council is updating its evidence base in respect of playing pitch provision, and the Local Plan will give due weight to the findings of this evidence.

The Local Plan cannot stop developers from land banking.

The Council will amend the wording in policy INF2 as suggested by United Utilities.

Sport England’s comments are noted.

The Highways Agency have commissioned consultants to undertake modelling work to enable a better understanding of the impact of the growth proposed in the Local Plan on the strategic road network. This will be a significant source of evidence to support the Local Plan and the results of the modelling work will feed into the Fylde Coast Highways and Transport Masterplan.

Viability testing of the Local Plan: Preferred Options document was completed in January 2014. Further viability testing will take place before the Publication version of the Local Plan is issued.

Recommendations for change

- Amend policy INF2 (b) to: b) Flood prevention and sustainable drainage measures (both on site and borough wide, including the retrofitting of sustainable drainage systems (see policy CL1);'
- Amend criterion d) of policy INF2 to read: "Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community".
- Amend criterion (e) of policy INF2 to read: "Green infrastructure – the network of natural environmental components and green and blue spaces (such as outdoor sports facilities..." so that the definition accords with the amended definition that is set out in the glossary.

Policy T1: Strategic Highway Improvements

Number of representations:

Comment	Support	Object	Total
6	2	0	8 ²⁵

Representations received from:

- Blackpool Council
- Wyre Borough Council
- Lancashire County Council
- BAE Systems Real Estate Solutions
- Highways Agency
- Councillor Ford on behalf of Liberal Democrat Members and supporters, including Councillors

What you said

BAE Systems Real Estate Solutions supported the highway proposals for the new link road (the Preston Western Distributor Road) running from Lea Gate in the south to the M55 in the north and agreed that it should assist access to the Enterprise Zone at Warton. BAE Systems Real Estate Solutions will continue to work with the Local Enterprise Partnership

²⁵ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

and the Councils in assessing the opportunities, identifying the infrastructure needs and costs and analysing the phasing and delivery options around the development within the Enterprise Zone.

Blackpool Council welcomed the policy to improve the identified routes. They suggested it would be appropriate to provide some evidence that alternatives to the identified routes have been considered and also that an M55 upgrade will not be required. They also suggested that it may be appropriate to include an undertaking within the background text to minimise landscape, biodiversity, drainage, severance and noise impacts, together with a commitment to environmentally sensitive design, mitigation and habitat re-provision. They also suggested that it may be helpful to know what the overall strategic aims for the Highways Network are, as identified locally.

Wyre Borough Council noted the continued support for the protection of the M55 - Norcross Link Road (i.e. the Blue Route). They considered that our two Local Plans will have to ensure that any safeguarded route is properly aligned between our districts and it will be important for the two Councils to work together with Lancashire County Council on the Fylde Coast Highways and Transport Masterplan.

Lancashire County Council welcomed references to the emerging Fylde Coast Highways and Transport Masterplan and its importance in the identification and taking forward of transport proposals and initiatives.

The Highways Agency acknowledged the intention to safeguard the proposed route of the M55 – Norcross Link Road (the Blue Route). Due to the funding status of the link road, the Agency notes that this is not a confirmed scheme and therefore recognition of this would need to be given when considering the impacts of additional traffic demands and the need to identify supporting measures. This is particularly important to note, if there is to be any reliance on this scheme to support the development aspirations of the Plan.

The Highways Agency also noted the intentions of the M55 to Heyhouses Link Road to improve access to the strategic sites identified in policy SL1 in chapter 7. It welcomed the fact that the funding and delivery of this scheme will be provided by the developer and welcomed the fact that this has been clearly presented in the supporting Infrastructure Schedule.

The Highways Agency are supportive of the proposed Preston Western Distributor Road which will contribute to alleviating congestion from new developments. They wish to be fully involved in the consultation process to understand and consider the new infrastructure requirements and potential impact of the proposed new link road on the M55.

The Highways Agency noted that the Fylde Coast Highways and Transport Masterplan is currently being prepared and will provide a transport evidence base to inform future highways and transport strategy development and the basis for future decisions on infrastructure planning and strategic priorities for this area. It is therefore not currently clear on what evidence the current transport infrastructure proposals are based, whether the cumulative impacts of the Plan's development aspirations have been fully assessed and therefore whether the measures set out within the Plan and supporting Infrastructure Delivery Plan are, appropriate, viable and deliverable. Once the Masterplan is reviewed the Highways Agency will be able to provide more detailed comment on the Plan's proposals and the suitability of the transport infrastructure improvements proposed.

The Highways Agency is particularly interested in the evidence that has been developed to determine the potential impacts of the Plan's development aspirations and respective measures and transport infrastructure improvements. This is required to ensure that from

the Agency's perspective, such measures are appropriate, viable and deliverable and that the operation and safety of the strategic road network will not be compromised as a consequence.

Cllr Ford, on behalf of Liberal Democrat Members and supporters, including Councillors emphasised the need to make greater efforts to promote improvements to the South Fylde Line. It should have a far higher priority and improvements to this line must be championed by Fylde Borough Council. Rail transport is sustainable and creates far fewer emissions and infrastructure improvements should be promoted and supported.

Council response

BAE Systems Real Estate Solutions, Wyre Borough Council's and Lancashire County Council's comments are noted.

The Council will update the list of strategic highway improvements in policy T1 to mirror those mentioned in the Fylde Coast Highways and Transport Masterplan when the masterplan is issued for consultation in Autumn 2014.

In terms of the comments made by Blackpool Council, Lancashire County Council as the Highway Authority, would be in a better position to provide evidence that alternatives to the identified routes have been considered and what the overall strategic aims for the Highways Network are, as identified locally. Equally, the Highways Agency would be able to answer the question as to whether the M55 requires to be upgraded or not. The current transport infrastructure proposals are based upon the priorities contained in Lancashire County Council's Local Transport Plan 3 (LTP3) 2011-2021, Implementation Plan 2012/13 – 14/15. The Fylde Coast Highways and Transport Masterplan, which is due out for consultation in Autumn 2014, will provide a transport evidence base for future road schemes and public transport initiatives, which will be implemented within the lifetime of the Local Plan.

The Highways Agency's comments about the M55 to Heyhouses Link Road and the Preston Western Distributor Road are noted. When referring to the M55 – Norcross Link Road (the Blue Route), the most up-to-date status possible will be afforded to this route.

The Council agrees with Blackpool Council's suggestion to refer in the supporting text to minimising landscape, biodiversity, drainage, severance and noise impacts, together with a commitment to environmentally sensitive design, mitigation and habitat re-provision.

The Council considers it necessary and helpful to cross refer in policy T1 to the good design policy (formerly policy ENV6, but it will become policy GD5 in the next version of the Local Plan), to the landscape policy (policy ENV1) and to a new policy which will be prepared on biodiversity in chapter 14.

The Council intends to draft an additional policy in chapter 8, which will set out general transport considerations for determining planning applications.

Recommendations for change

- The strategic highway improvements listed in policy T1, together with the supporting text, will be updated in line with the schemes identified in the Fylde Coast Highways and Transport Masterplan, when it is issued for consultation in Autumn 2014.

- Add the following sentence at the end of policy T1: “Proposals for new roads and for strategic highways improvements will need to comply with the requirements of policy GD5 on good design in development and policy ENV1 on landscape and policy ENV2 on biodiversity.”
- Add an extra paragraph after paragraph 12.40 of the Preferred Options saying: “The Council will work with Lancashire County Council, as the Highway Authority, to minimise landscape, biodiversity, drainage, severance and noise impacts. There will be a commitment to environmentally sensitive design, mitigation and habitat re-provision”.
- Draft a new policy in chapter 8 which will set out general transport considerations for determining planning applications.

Policy T2: Blackpool International Airport

Number of representations:

Comment	Support	Object	Total
3	0	0	3

Representations received from:

- Blackpool Council
- Blackpool International Airport
- Centrica

What you said

Blackpool International Airport noted the emerging Local Plan essentially carries forward the previous policy approach to planning for the Airport and they welcomed the Council's commitment to supporting the continued operation and viability of the Airport. However, in order to deliver this support, the policy framework must better reflect the challenges and opportunities at Blackpool International Airport in the context of a national decline in the growth of air travel since 2008. In particular, to ensure the need to be aligned with the emerging Airport Master Plan which enables consolidation and release of land at the airport for non-aviation uses to meet other identified needs in Fylde including housing land supply.

Blackpool International Airport are seeking a policy framework which:

- Establishes the Council's ongoing commitment to support the continued operation and viability of the Airport as an important regional facility;
- Identifies the Airport as an area of change; and
- Provides a positive and flexible policy framework to deliver appropriate land uses on any surplus land identified, which could include housing and commercial uses. (This will necessitate a partial and localised review of Green Belt land affecting the Airport).

Blackpool Council supported the policy but would welcome support for improvements to surface access (public transport) to the airport from surrounding areas and other transport nodes.

Centrica requested that its heliport and associated facilities be safeguarded by policy T2. It is suggested that an Airport Safeguarding Zone should be designated around Blackpool International Airport, which should include Centrica's heliport. This Zone should be shown on the Local Plan Policies Map and development of buildings or structures within this Zone, which might restrict or have a negative impact on the operation of the Airport and Centrica's heliport, should be resisted.

Council response

Comments relating to a review of Green Belt are dealt with under the Council Response to policy GD1 in chapter 8 and in paragraph 8.7 of the Preferred Options document. Paragraph 8.7 says that: “no strategic review of the Green Belt within Fylde Borough will be undertaken when producing the Local Plan”. The NPPF clarifies that “Green Belt boundaries should only be altered in exceptional circumstances”. The Council does not believe that there are “exceptional circumstances” to review the Green Belt.

In terms of flexibility at Blackpool International Airport, the Government recently made it clear that it is up to the LPA whether Green Belt should be released for residential use. Retail development is not considered to be acceptable on the site. The retail hierarchy is set out in policy EC4 in chapter 9. The settlement hierarchy, in terms of key service centres and local service centres, is set out in paragraphs 6.8 and 6.9 of chapter 6 – The Spatial Development Framework. The Employment Land and Premises Study, 2012, recommended the Blackpool International Airport land for B1 (a) offices at paragraph 11.18 of the Study and at Table 66. At paragraph 11.17 of the Employment Land and Premises Study, however, it was stated that at least half of the land should be allocated for B1, B2 and B8 employment uses. In paragraph 11.17, BE Group made the general comment that half the site should be secured for B-class employment, rather than retail use. Uses considered to be suitable would reflect what is already in place on Amy Johnson Way.

The Council agrees that an Airport Safeguarding Zone should be designated around Blackpool International Airport and that the airport should include Centrica’s heliport. The Council agrees to make reference to Centrica’s heliport and associated facilities within Policy T2. The Council agrees to include the Airport Safeguarding Zone on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan. The Council agrees to strengthen the wording in the policy regarding the Airport Safeguarding Zone at Blackpool International Airport and to include a reference to consulting with the airport on proposed new developments in proximity to the airport.

It is recommended that improved surface access movement to and from Blackpool International Airport should be specifically addressed via an Airport Surface Access Strategy. Policy T2 will be expanded to promote the Airport Surface Access Strategy.

Recommendations for change

- Designate an Airport Safeguarding Zone around Blackpool International Airport, incorporating Centrica’s heliport and identify the Airport Safeguarding Zone on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan (Part 1).
- Strengthen the wording in policy T2 regarding the Airport Safeguarding Zone.
- Include a reference in policy T2 to Centrica’s heliport and associated facilities at Blackpool International Airport.
- Insert a reference in policy T2 to the Airport Surface Access Strategy.

Policy T3: Enhancing Sustainable Transport Choice
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Number of representations:			
Comment	Support	Object	Total
5	1	0	6

Representations received from:

- Blackpool Council
- Highways Agency
- National Farmers Union
- Lancashire Wildlife Trust
- 1 Resident

What you said

A resident commented that if off-road routes for walkers and cyclists were done in an imaginative way, it may also be possible to link the local routes into a circle or ring in the Fylde, possibly incorporating the Promenade or coastline. This would be a valuable leisure facility for residents and an attraction for visitors.

Blackpool Council supported the aims of this policy and the coverage that it has over different factors affecting sustainable transport. They suggested it may be helpful to mention the need to join the different transport modes and co-ordinate times and routes to ensure a comprehensive and coherent sustainable transport network. Also, travel plans will need to be monitored to ensure that they are acted upon.

Blackpool Council suggested some amended wording for paragraph 12.49 to "...could include".

The Highways Agency was particularly supportive of this policy - working with neighbouring authorities and transport providers to improve accessibility and movement across the borough and to ensuring new development proposals are supported by travel plans in accordance with Department for Transport guidance on transport assessments. The Highways Agency supported a modal shift away from the private car as it should help to reduce the need to travel and therefore have beneficial implications for the strategic road network.

The National Farmers Union requested being consulted when any changes or upgrades to existing rights of way or creation of new routes are planned in the rural area.

Lancashire Wildlife Trust confirmed that part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02).

Council response

The comments made by a resident, the Highways Agency, National Farmers Union and the Lancashire Wildlife Trust are noted.

The Council agrees with Blackpool Council's proposed wording change at paragraph 12.49 to "... could include..."

The Council will amend policy T3 in respect of integrating different modes of transport.

The Council agrees with Lancashire Wildlife Trust to insert text confirming that part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02).

Recommendations for change

- Add the following new sentence at the end of paragraph 12.48 of the Preferred Options: “Part of the South Fylde Railway Line is designated as a biological heritage site (BHS 33SW02)”.
- Amend paragraph 12.49 of the Preferred Options to “...could include”.
- Add a new criterion i) to policy T3: “work with service providers to integrate different modes of transport, to ensure a comprehensive and coherent sustainable transport network”.

Policy T4: Parking Standards

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- Highways Agency

What you said

The Highways Agency will consider parking standards as part of the planning application process but would wish to ensure that sufficient consideration is given to reduce the need to travel and consider the influence that car parking provision has on this aspiration.

Council response

The Highways Agency’s comments are noted. The Council supports reducing the need to travel. It is considered that the proposed car parking provision supports this.

Recommendations for change

- None

Chapter 13: Sustaining the Environment and Addressing Climate Change

Chapter 13: Sustaining the Environment and Addressing Climate Change

Number of representations:			
Comment	Support	Object	Total
1	0	0	1

Representations received from:

- One residential developer

What you said

A residential developer welcomed the exclusions of a blanket approach to renewable energy requirements.

Council response

Comments noted.

Recommendations for change

- None

Policy CL1: Flood Alleviation and Water Efficiency

Number of representations:			
Comment	Support	Object	Total
12	1	3	16 ²⁶

Representations received from:

- Campaign to Protect Rural England (CPRE) – Fylde District
- English Heritage
- Environment Agency
- United Utilities
- National Farmers Union
- Westby-with-Plumpton Parish Council
- Blackpool Council
- Lancashire County Council
- 2 residents
- 1 residential developer

²⁶ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

What you said

United Utilities suggested amending the wording of criterion (a) of policy CL1 to say: “Ensuring that new development incorporates ‘the most sustainable form of managing surface water. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be greenfield run off rate on greenfield sites. On brownfield sites surface water betterment will be expected. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. The priority options for the management of surface water are set out in detail in the infrastructure delivery plan”.

Surface Water Flooding

The Environment Agency suggested that paragraph 13.11 should make reference to surface water flooding; and that the first sentence of paragraph 13.11 should be amended to say: “The Level 1 Strategic Flood Risk Assessment for Fylde (2011) provides an assessment of current and future levels of flood risk in the Borough.”

The EA strongly supported policy CL1. They recommended that the name of the policy should be amended to: “Policy CL1 Flood Alleviation, Water Quality and Water Efficiency”, and that part (g) of the policy is amended so that it says: “Ensuring that new development does not adversely affect the quality of surface and groundwater and where possible contributes towards improving it.”

A resident commented that agricultural land is out of production due to flooding. Westby with Plumpton Parish Council made similar comments, adding that the drainage system has been poorly maintained; that the pumping station at Lytham is non-functional; and that new housing and commercial development should not take place. CPRE – Fylde District commented that the issue of prevention and alleviation of flooding of agricultural land should be acknowledged explicitly in policy CL1.

After paragraph 13.17, United Utilities suggested that the council could consider including the following paragraph:

“It is a clear priority of the council that development should not discharge to public sewerage system, directly or indirectly, where alternatives are available. In some circumstances, however, discharge to public sewer, directly or indirectly, may be the only option. In those circumstances, a contribution may be requested to retrofit / divert surface water elsewhere in the borough to negate the impact of discharging surface water to the public sewer. The applicant will also be expected to mitigate the impact of surface water discharge to the public sewer through landscaping schemes and other measures, which will include maximising the use of permeable surfaces and grey water and rainwater harvesting measures.”

The National Farmers Union were pleased that paragraph 13.19 recognises the issues faced by the agricultural community. They hoped that all future development took into consideration the impact of surface water run-off on the wider community, including farmland. They also stated that they hope that on-going maintenance of drainage would take place on any new development to alleviate flooding in the future.

Sewer Capacity and Sustainable Drainage Systems

Blackpool Council suggested that the policy should ensure that surface water run-off is kept out of any combined sewer system. They also welcomed the support for the retro-fitting of sustainable drainage systems being within the policy and the emphasis being placed on

clean bathing water in the supporting text. There was concern from one resident about wastewater flooding at Warton and it was questioned whether the wastewater / sewerage infrastructure would be able to cope with new development.

Lancashire County Council commented that the policy needs to say that sustainable drainage systems should be incorporated into development proposals wherever the opportunity arises, and that traditional drainage solutions should only be considered once all potential sustainable drainage systems options for the proposal have been exhausted. Lancashire County Council also said that the policy and supporting text should seek to incorporate opportunities to maximise biodiversity into flood defences and sustainable drainage systems wherever possible.

Water Efficiency

A residential developer confirmed that Building Regulations set the minimum standards for water use. The developer said that the paragraph 13.21 should reference this, rather than the Code for Sustainable Homes, particularly as the future of the Code is uncertain at present and that the Council does not have a minimum requirement for developments to adhere to the assessment method.

Water Framework Directive

The EA recommended that the following criteria should be added to the policy: "There is no risk of pollution to controlled waters from land contamination on previously developed sites." They added that this will ensure new development on these sites contributes to the objectives of the EU Water Framework Directive.

Heritage Assets

English Heritage suggested that the policy should be amended to include reference to the historic environment concerning flooding. They also commented that there is a need to ensure that the schemes being put forward to reduce flooding will not have an adverse impact on the character and setting of historic assets, and also that there may be a need to protect historic assets that are at risk of flooding. They suggested that the following criteria should be added to the policy: "Ensuring that new development and flood alleviation proposals minimise the harm to the significance of heritage assets."

Other issues

The EA strongly supported the requirement in paragraph 13.24 for buffers to be provided around watercourses and water features. They also recommended amending paragraph 13.25 as follows: "Provision of green infrastructure and open space within new developments has a major role to play in mitigating and adapting to climate change, for example by reducing CO₂ emissions, providing flood alleviation measures and the use of sustainable drainage systems." For paragraph 13.29 they commented that the Pleasure Island defences have a longer residual life than five years, and that the Fylde Coast Protection Strategy should be referred to for more details.

They also recommended that if a flood map is included in the Local Plan, a caveat should be included which states that the map may not be up to date and to check the EA website for the latest information.

Council response

The Council will amend policy CL1 as suggested by United Utilities and add a new paragraph after 13.17, regarding surface water.

Surface Water Flooding

The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

The Council will consider whether reference should be made to ensuring that surface water run-off is kept out of the combined sewers within the policy, or whether this should just be referenced in the justification to the policy.

Government regulations from 1 April 2014 will require all major development to incorporate Sustainable Drainage Systems. From 1 April 2017, all minor development will also be required to incorporate sustainable drainage systems. The approval body for sustainable drainage systems will be the Lead Local Flood Authority, which is Lancashire County Council. The County Council will also be responsible for maintaining sustainable drainage systems when adopted.

Surface water flooding of agricultural land is not a reason for not allowing development. The EA have advised the Council that there are normally engineering solutions to surface water issues when new development takes place. The Council will consider whether reference to the protection of agricultural land from flooding should be included in the policy.

It would be unreasonable to expect developers that have incorporated sustainable drainage systems into their development to be responsible for the maintenance of drains and dykes that are designed to drain farmland. However, the Council will consider drainage improvement measures when developing a Community Infrastructure Levy.

Sewer Capacity and Sustainable Drainage Systems

In terms of the impact on the combined sewers, the Council is engaging with United Utilities to ensure that the combined sewer network can accommodate the proposed level and distribution of development set out in the Local Plan. More details will be set out in the Infrastructure Delivery Plan, which will support the Local Plan.

Given the new sustainable drainage systems regulations implemented in April 2014, the Council considers it necessary to include a policy in the Local Plan (Part 1) on the requirement for sustainable drainage systems.

Water Efficiency

The Department for Communities and Local Government (DCLG) are currently assessing the results of a review of housing standards. Once the results of the review and the recommendations have been fully considered, water efficiency measures may become part of Building Regulations. Consequently, it is anticipated that the Council will no longer include in the Local Plan a requirement for new housing development to achieve the minimum standards for potable water efficiency as defined in the Code for Sustainable Homes. However, the Council will retain reference to water efficiency measures until they become part of Building Regulations.

Water Framework Directive

The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

Heritage Assets

The Council does not consider that this policy should include reference to the protection of historic assets. Rather, the proposed re-drafted policy ENV5 in chapter 14 of the Preferred Options document is designed to protect and enhance heritage assets.

Other issues

The Council agrees with the comments made by the EA and will make the necessary changes based upon their comments as outlined above.

Recommendations for change

- Amend the first sentence of paragraph 13.11 of the Preferred Options to say: “The Level 1 Strategic Flood Risk Assessment for Fylde (2011) provides an assessment of current and future levels of flood risk in the Borough.”
- Amend the title of policy CL1 to: “Policy CL1 Flood Alleviation, Water Quality and Water Efficiency”.
- Amend part (a) of policy CL1 to say: “Ensuring that new development incorporates the most sustainable form of managing surface water. This will be expected to be investigated and confirmed as part of any planning application submission. It will be necessary to attenuate any discharge of surface water through the incorporation of sustainable drainage systems. This would be greenfield run-off rate on greenfield sites. On brownfield sites surface water betterment will be expected. The preference will be for no surface water to discharge to the public sewer, directly or indirectly, if more sustainable alternatives are available. The priority options for the management of surface water are set out in detail in the Infrastructure Delivery Plan”.
- Amend part (g) of policy CL1 to: “Ensuring that new development does not adversely affect the quality of surface and groundwater and where possible contributes towards improving it.” In addition, the following criteria should be added to the policy: “There is no risk of pollution to controlled waters from land contamination on previously developed sites.”
- After paragraph 13.17 of the Preferred Options, add the following new paragraph: “It is a clear priority of the council that development should not discharge to public sewerage system, directly or indirectly, where alternatives are available. In some circumstances, however, discharge to public sewer, directly or indirectly, may be the only option. In those circumstances, a contribution may be requested to retrofit / divert surface water elsewhere in the borough to negate the impact of discharging surface water to the public sewer. The applicant will also be expected to mitigate the impact of surface water discharge to the public sewer through landscaping schemes and other measures, which will include maximising the use of permeable surfaces and grey water and rainwater harvesting measures.”
- Add a new policy on sustainable drainage systems (SuDS).
- Amend paragraph 13.25 of the Preferred Options as follows: “Provision of green infrastructure and open space within new developments has a major role to play in mitigating and adapting to climate change, for example by reducing CO₂ emissions, providing flood alleviation measures and the use of sustainable drainage systems.”
- Delete the reference to main rivers from the footnote on page 140 of chapter 13 and add a definition of “Main Rivers” to the glossary.
- Amend the opening sentences of paragraph 13.29 of the Preferred Options to read: “The manmade coastal defences at Fairhaven Lake and Church Scar (between Ansdell Road South and Lytham Green) have a residual life of less than five years, however, the Pleasure Island defences have a longer residual life... the east end of Lytham at risk. Mitigation measures are set out in detail in the Fylde Coast Protection Strategy”.
- If a flood map is included in the Local Plan, a caveat / footnote should be included which states that the map may not be up-to-date and to check the Environment Agency website for the latest information.

Policy CL2: Renewable and Low Carbon Energy Generation

Number of representations:			
Comment	Support	Object	Total
5	2		7

Comment	Support	Object	Total
5	2		7

Representations received from:

- English Heritage
- Highways Agency
- Lancashire Wildlife Trust
- Campaign to Protect Rural England (CPRE) – Fylde District
- BAE Systems Real Estate Solutions
- Blackpool Council

What you said

English Heritage supported the “impact on the historic environment and assets” in criterion e).

CPRE – Fylde District supported the “cumulative impacts on landscape character and value” in criterion a).

Highways Agency welcomed the consideration of “highway safety and capacity” in criterion h).

BAE Systems Real Estate Solutions supported the “impact on Warton Aerodrome” in criterion g). BAE Systems Real Estate Solutions would support further guidance in relation to this along with a plan showing an exclusion zone for certain developments within proximity to the aerodrome.

Lancashire Wildlife Trust suggested in relation to criteria (c) and (d), that consideration should be given to a reference to bird sensitive areas on the Fylde, as defined in the RSPB / Wildlife Trust document Wind Turbines, Sensitive Bird Populations and Peat Soils: A Spatial Planning Guide for on-shore wind farm developments in Lancashire, Cheshire, Greater Manchester and Merseyside. Reference was also made to sites being functionally linked to the Ribble and Alt Estuaries Special Protection Area in South Fylde and possibly the Morecambe Bay Special Protection Area further north. The cumulative effects need to be considered, both within Fylde and over the border in Preston and Wyre districts.

In relation to paragraph 13.41, Lancashire Wildlife Trust suggested the Local Plan should reflect latest planning policy guidance for shale gas exploration and extraction (hydraulic fracturing) and make Fylde Council’s role in the planning process clear to residents.

In relation to paragraph 13.43, Blackpool Council suggested that it may be helpful to mention in the policy that proposals should use the Lancashire Renewable Energy Study as a guide to their location, giving greater certainty to developers and guiding decision making.

Council response

The Council will liaise with BAE Systems Real Estate Solutions regarding provision of the airport safety exclusion zone for certain developments within proximity to Warton aerodrome.

The Fylde Local Plan Sustainability Appraisal and Habitat Regulations Assessment Screening reports consider the cumulative effects of the Local Plan policies on the Ribble and Alt Estuaries Special Protection Area in South Fylde and the Morecambe Bay Special Protection Area further north. The cumulative impact of the renewable and / or low carbon development within Fylde and beyond will be added to the policy / justification considerations.

The policy justification will be expanded to refer to bird sensitive areas on the Fylde, as defined in the RSPB/Wildlife Trust document Wind Turbines, Sensitive Bird Populations and Peat Soils: A Spatial Planning Guide for on-shore wind farm developments.

The policy justification will refer to the Lancashire Renewable Energy Study to guide proposals, giving greater certainty to developers and guiding decision making.

Shale gas exploration and extraction is dealt with in chapter 1, which clarifies the Council's role in the planning process. Reference to the County Council's emerging supplementary planning document on shale gas exploration and extraction will be added to chapter 1.

Recommendations for change

- Add a reference to bird sensitive areas on the Fylde in the policy justification in relation to criteria (c) and (d). Reference also needs to be made to sites being functionally linked to the Ribble and Alt Estuaries Special Protection Area in south Fylde and possibly the Morecambe Bay Special Protection Area further north.
- Add a reference to cumulative impacts in Fylde and over the border in Preston and Wyre in the policy / justification considerations.
- Add a reference in paragraph 13.43 of the Preferred Options document to the Lancashire Renewable Energy Study, to guide developments.
- The Council agrees to make reference to the County Council's emerging shale gas exploration and extraction supplementary planning document in chapter 1.

Policy CL3: Decentralised Energy Networks and District Heating System

Number of representations:

Comment	Support	Object	Total
1	1	0	2

Representations received from:

- BAE Systems Real Estate Solutions
- A retail developer

What you said

BAE Systems Real Estate Solutions supported this policy aspiration. The policy should refer to the viability and feasibility of schemes in order to deliver decentralised energy supply in line with paragraph 96 of the NPPF. This recommendation was supported by a retail developer.

Council response

The Council agrees to include viability and feasibility of the scheme in the policy, so as to reflect paragraph 96 of the NPPF.

Recommendations for change

- Add the following paragraph at the end of policy CL3: “In determining planning applications, local planning authorities should expect new development to comply with the adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that it is not feasible or viable and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption”.

Policy CL4: Sustainability Statements

Number of representations:

Comment	Support	Object	Total
1	1	2	4

Representations received from:

- English Heritage
- Environment Agency
- Blackpool Council
- A residential developer

What you said

English Heritage suggested the policy should refer to the historic environment. An additional criteria should be inserted: "Conserve and enhance the significance of a heritage asset and ensuring that any proposals minimise harm to the historic environment".

The Environment Agency were strongly in support of the policy in relation to mitigating and adapting to climate change and appropriate improvements to sustainability.

A response suggested the policy should be deleted, sustainability statements is unjustifiable and an additional developer constraint. International and National standards are more than suitable to ensure that energy and climatic standards are met.

Blackpool Council commented that this policy requires the submission of a sustainability statement for all major new build and conversion developments. Although HCA national

design standards are required for all housing developments through policy H1 of the Preferred Options document, there is no requirement for all minor conversions and non-residential developments.

Council response

The Council intends to delete policy CL4 as the requirements are picked up in the NPPF, but move relevant sections into the design policy in chapter 8. There were also issues about how the Council were going to determine future applications based on applicants submitting a sustainability statement to demonstrate they had considered a range of key sustainability criteria.

Recommendations for change

- Delete policy CL4 as it is picked up in the NPPF, but move relevant criteria from this policy into the design policy (It is also proposed to move the design policy from chapter 14 to become policy GD5 in chapter 8).

Chapter 14: Preserving and Enhancing the Natural and Built Environment

Policy ENV1: Landscape and Biodiversity

Number of representations:			
Comment	Support	Object	Total
7	1	3	11 ²⁷

Representations received from:

- Environment Agency
- Campaign to Protect Rural England (CPRE) – Fylde District
- Lancashire Wildlife Trust
- United Utilities
- Blackpool Council
- Lancashire County Council
- 4 residents

What you said

Lancashire Wildlife Trust and Lancashire County Council claimed that the Local Plan does not plan positively for the creation, protection, enhancement and management of networks of biodiversity as required by the NPPF. They said that the Plan does not identify and map local ecological networks, which should take place at the landscape scale across local authority boundaries. Blackpool Council welcomed continued collaboration with the Council to ensure that development that comes forward at the Fylde-Blackpool Periphery considers landscape characteristics and habitats.

Lancashire County Council stated that the identification and mapping of local ecological networks needs to be based on up-to-date information so as to comply with the NPPF (paragraphs 109, 113 and 117), and that Lancashire County Council can provide this information. They also stated that a Lancashire Ecological Framework is being prepared for the County which takes account of the hierarchy of sites. They added that the Local Plan should support this work through the development of a local ecological network at the district level in line with the NPPF.

Lancashire Wildlife Trust commented that parts (c), (d), (e) and (f) seem weak. The Trust added that this criteria needs to be more positive, requiring the enhancement of biodiversity in accordance with the NPPF. They also stated that applicants for development must be required to submit an ecological survey with their planning applications. Lancashire County Council suggested that criterion (e), “where practicable” is ambiguous and fails to adequately address the NPPF.

CPRE – Fylde District claimed that the Lancashire Landscape Character Assessment (2000) is out-of-date. They said that Natural England’s National Character Areas provide a decision making framework for the natural environment.

²⁷ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

CPRE – Fylde District said tranquillity is a highly valued characteristic of the English countryside and one of the most important indicators of its quality. They therefore claimed that they would like to see reference to the identification and protection of areas of tranquillity, in compliance with the NPPF.

The Environment Agency supported this policy in relation to aquatic habitats.

United Utilities suggested some alternative wording for policy ENV1.

A resident commented that too much wildlife along with their habitats will be lost to new development, and also that more brownfield sites should be considered. A resident said that the only way to conserve site H13 and to maintain its unique wild character would be to not build on the site. A resident claimed that paragraph 14.4 is a good description of Whyndyke Farm.

A resident expressed support for the views in paragraph 14.18, which summarises some of the key points raised in the earlier “Issues and Options” consultation. The respondent added that there should be a commitment from developers to mitigate the effects on the countryside; and that landscaped buffers should be implemented before development takes place outside settlement boundaries so that the buffer has time to establish itself and become effective.

Council response

The Council acknowledges that the Local Plan needs to plan for biodiversity at the landscape-scale and identify and map components of local ecological networks. The Lancashire wide Ecological Framework has now been prepared and will contribute towards fulfilling this requirement for the Local Plan. The Council will therefore take forward the Lancashire Ecological Framework and use it as a basis to form the local ecological framework for Fylde, which will provide part of the background evidence for the Local Plan.

The Council considers that policy ENV1 needs to be split into two with the landscape issues dealt with in one policy and the biodiversity (nature conservation) issues dealt with in a separate policy, setting out the hierarchy of nature conservation designations and strengthening the existing wording. This will ensure that it will be more effective at minimising impacts on biodiversity. The Council considers that the biodiversity policy should not include the requirement for an ecological assessment to be submitted with a planning application, as this is dealt with in the NPPF and in the national check list.

Natural England have advised the Council that the National Character Area Profiles and the Lancashire Landscape Character Assessment should be considered together. The Lancashire Landscape Character Assessment is a detailed assessment of landscape at the County level, whilst the National Character Area Profiles are more strategic in nature and would sit above the Lancashire Landscape Character Assessment.

The Council recognises that the NPPF requires planning policies to identify and protect areas of tranquillity. The Council will cover areas of tranquillity in the landscape assessment work on the strategic locations for development, which will take place prior to the issuing of the next version of the Local Plan.

There were biodiversity constraints on some of the sites that were considered for inclusion in the Preferred Options document. Where significant harm to biodiversity cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or,

as a last resort, compensated for, then the site was not taken forward in the Preferred Options document.

The Council agrees to add text on nature conservation – i.e. species protection, habitat protection and enhancement to the separate new policy on Biodiversity (nature conservation).

The Council will amend criterion f) of policy ENV1 of the Preferred Options document as suggested by United Utilities.

The Council considers that there is a need to carry out landscape assessment work on the strategic locations for development across the Borough, including landscape buffers, so as to enhance policy ENV1 and assist the Development Management Team when dealing with planning applications.

The Council considers that it could potentially be impractical for all development that would impact upon the countryside to implement a landscaped buffer before development takes place. Rather, it is anticipated that specific requirements, including when the landscaped buffer would be phased, would be considered on a case-by-case basis.

Recommendations for change

- Draft a separate new policy solely on Biodiversity, in the next version of the Local Plan, so that policy ENV1 deals entirely with Landscape. The new Biodiversity policy will include the hierarchy of international, national and local designated nature conservation sites, species and habitat protection, habitat enhancement, and the potential for appropriate mitigation.
- Add a new paragraph to the justification text of the new policy on Biodiversity, on the functional ecological network for Lancashire, in the next version of the Local Plan.
- Amend criterion f) of policy ENV1 of the Preferred Options document to read: “Suitable landscape planting should be incorporated within or, where appropriate, close to new development. Measures should be put in place for the management of such landscaping. Specific consideration should be given to how landscaping schemes will minimise the rate of surface water run-off.”
- Make reference in the justification to policy ENV1 (Landscape) to the Lancashire Amounderness Plain National Character Area and use it as part of the evidence base for policy ENV1.
- Add the following text to paragraph 14.4 of the Preferred Options: “The landscape of Fylde contributes to the local distinctiveness of the Borough. The Council will carry out landscape assessment work at the strategic locations for development across the Borough, including the provision of landscape buffers, so as to enhance policy ENV1 and assist the Development Management Team when dealing with planning applications. Development that takes place outside settlements ...”

Policy ENV2: Protecting Existing Open Space and Green Infrastructure

Number of representations:

Comment	Support	Object	Total
4	1	2	7 ²⁸

Representations received from:

- English Heritage
- Environment Agency
- Sport England
- Lancashire Sport Partnership Ltd
- Campaign to Protect Rural England (CPRE) – Fylde District
- Kirkham Grammar School
- 1 resident

What you said

Sport England suggested separating out the outdoor sports elements into a separate policy possibly to be included within the Health and Wellbeing chapter (chapter 11), to reflect the distinct role and function of outdoor sport with a cross reference from this policy to the outdoor sport policy. In addition, to referring to the requirements of paragraph 74 of the NPPF, paragraph a) of Policy ENV2 of the Preferred Options document should also include “and the findings of any adopted Needs Assessment are met.” This then provides a direct link between what is actually needed in the area and the policy. Sport England’s suggested new policy for inclusion in chapter 11 is set out below:

“In order to provide appropriate indoor and outdoor sports facilities for the communities of Fylde, the Council will:

1. *Protect existing indoor and outdoor sports facilities, unless:*
Either:
 - a) *They are proven to be surplus to need; or*
 - b) *Improved alternative provision will be created in a location well related to the functional requirements of the relocated use and its existing and future users;*
And in all cases:
 - c) *The proposal would not result in the loss of an area important for its amenity or contribution to the character of the area in general; and*
2. *Support new indoor and outdoor sports facilities where:*
 - a) *They are readily accessible by public transport, walking and cycling; and*
 - b) *The proposed facilities are of a type and scale appropriate to the size of the settlement; and*
 - c) *Where they are listed in an action plan in any emerging or subsequently adopted Playing Pitch Strategy or Indoor Sports Strategy, subject to the criteria in the policy.*
3. *Make sure that major residential developments contribute, through land assembly and financial contributions, to new or improved sports facilities where development will increase demand and / or there is a recognised shortage.”*

Lancashire Sport Partnership Ltd questioned what the evidence was for the statement in paragraph 14.25 that “there are deficiencies in the green infrastructure network in Fylde”. As the Open Space and Recreation Study, 2008, is more than 3 years old it will need to be updated. Lancashire Sport Partnership also queried criterion d) in policy ENV2 of the Preferred Options document, regarding what would the Council base an adequate area of school playing field on? Lancashire Sport Partnership assumed that, if the Playing Pitch Strategy indicates there is a deficiency in open space and pitches that any loss of playing pitches would be replaced like for like or appropriate other space provided, and not just

²⁸ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

accept what might be left over after a school has been extended. In paragraph 14.31 it says that there will be a review of evidence on open space including pitches for preparation of Local Plan Part 2. Lancashire Sport Partnership is concerned that it could take 12 months to write a new playing pitch strategy.

English Heritage suggested that criterion (b) and paragraph 14.27 should be omitted from this policy and addressed in policy ENV5 (Heritage Assets) of the Preferred Options document. They said that the assessment of the impact of a development proposal on a registered park and garden, should relate to the requirements of paragraph 132 of the NPPF, and that criterion (b) should be amended to reflect the wording and be incorporated into policy ENV5 of the Preferred Options document.

English Heritage also claimed that there needs to be a proper assessment of registered Historic Parks and Gardens and that this should be identified in the Spatial Portrait of Fylde and the area descriptions. They also suggested that ENV2 of the Preferred Options document would benefit by referencing the designated parks and gardens as part of the existing green infrastructure.

The Environment Agency supported this policy. CPRE – Fylde District commended the protection to be given to the open space network in this policy. However, they said that there should be reference to the Hedgerows Regulations 1997 in the policy.

Kirkham Grammar School claimed that criterion (d) in policy ENV2 of the Preferred Options document does not accord with the exceptions in paragraph 74 of the NPPF.

A resident said that green infrastructure should have biodiversity value. Another resident claimed that the policy does not protect greenfield land and farmland, and that the Preferred Options document allocates sites on greenfield land.

Council response

The Council agrees with Sport England's suggestion to separate out the outdoor sports elements from policy ENV2 of the Preferred Options document and to create an additional policy on indoor and outdoor sports facilities, to be included within the Health and Wellbeing chapter (chapter 11). The Council also agrees to refer in paragraph a) of Policy ENV2 of the Preferred Options document to "the findings of any adopted Needs Assessment are met."

The reference in paragraph 14.25 to deficiencies in the green infrastructure network is derived from the Open Space and Recreation Study, 2008. The Council agrees with Lancashire Sport Partnership Ltd that, as the Study is more than 3 years old, it will need to be updated. The Council agrees with Lancashire Sport Partnership's assumption over criterion d) of policy ENV2 of the Preferred Options document that, if the Playing Pitch Strategy indicates there is a deficiency in open space and pitches, that any loss of playing pitches would be replaced like for like or appropriate other space provided. The Council considers that reference in paragraph 14.31 to a review of evidence on open space including pitches for preparation of Local Plan Part 2, should be retained. It could take up to 12 months to write a new playing pitch strategy, however the Council is considering updating the strategy in accordance with advice provided by Sport England, which should take considerably less time.

The Council will amend the Local Plan so that registered Historic Parks and Gardens are referenced in policy ENV5 (Heritage Assets) of the Preferred Options document rather than in policy ENV2 (Protecting Existing Open Space and Green Infrastructure). In addition,

paragraph 14.27 referring to Historic Parks and Gardens will be omitted from chapter 14. The Council will also ensure that this part of the policy better aligns with the requirements of paragraph 132 of the NPPF.

The Council does not have the resources to undertake an assessment of registered Historic Parks and Gardens within the timescales of the preparation of the Local Plan. The Council will include reference to registered Historic Parks and Gardens in the Spatial Portrait of Fylde in chapter 2.

Hedgerows are referenced in policy ENV1. The Council does not consider it necessary to include this again in policy ENV2 of the Preferred Options document.

The Council will ensure that criterion (d) is amended so that it better aligns with paragraph 74 of the NPPF.

Recommendations for change

- Amend criterion a) to read: “Existing public open space, including sports and playing pitches, will be protected unless the requirements of paragraph 74 of the NPPF and the findings of any published needs assessment are met.”
- Remove the references to Registered Historic Parks and Gardens from criterion b) of policy ENV2 of the Preferred Options document and move to policy ENV5 ‘Heritage Assets’. Following the removal of the references to Registered Historic Parks and Gardens from criterion b), re-number the subsequent criteria c) to f) as b) to e).
- Ensure that the policy wording for policy ENV5 of the Preferred Options document relating to registered Historic Parks and Gardens better aligns with paragraph 132 of the NPPF. Delete paragraph 14.27, which refers to registered Historic Parks and Gardens from ENV2 of the Preferred Options document and move the text to paragraph 14.56 and subsequent paragraphs, which introduces Policy ENV5 (Heritage Assets). Following the deletion of existing paragraph 14.27, re-number the subsequent paragraphs.
- Amend criterion (d) of policy ENV2 of the Preferred Options document so that it reads: “Development that results in the loss of existing open space or sports and recreation facilities (including playing fields) will only be permitted if one of the following criteria are met:
 - i. The open space has been identified by the Council as being unsuitable for retention because it is under used, poor quality or poorly located;
 - ii. the proposed development would be ancillary to the use of the site as open space and the benefits to recreation would outweigh any loss of the open area; or
 - iii. Successful mitigation takes place and alternative provision is provided in the same locality, on a like for like basis.”
- Add a new policy on indoor and outdoor sports facilities in chapter 11 (Health and Wellbeing).
- Update the Open Space and Recreation Study, 2008 and the Playing Pitch Strategy.

Policy ENV3: Provision of Open Space and Green Infrastructure

Number of representations:

Comment	Support	Object	Total
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5	0	2	7
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Representations received from:

- English Heritage
- Sport England
- Lancashire Sport Partnership Ltd
- Home Builders Federation
- Blackpool Council
- 1 resident
- 1 residential developer

What you said

Blackpool Council welcomed reference to cross boundary working. They said that a co-ordinated approach should be taken at the Fylde-Blackpool Periphery to enable the integration and linkage of any proposed green infrastructure and open space within existing green infrastructure networks in Blackpool and Fylde.

Blackpool Council suggested that reference to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council.

Sport England claimed that it was not clear whether policy ENV3 of the Preferred Options document includes outdoor sports facilities. If it does, the standards are unworkable for pitch / court provision. Developer contributions / commuted sums should be obtained in accordance with the Playing Pitch Strategy action plan.

Lancashire Sport Partnership Ltd questioned whether the reference in policy ENV3 of the Preferred Options document to ‘facilities for children’s play’ related to playgrounds and Multi-Use Games area(s). The reference in paragraph 14.32 to the Open Space, Sport and Recreation Study 2008 may need to be amended if the Study is updated. In paragraph 14.34, there is a reference to ‘close to’. What does ‘close to’ mean? Will this be based on travel time, walking distance and is this open to interpretation? Lancashire Sport Partnership Ltd highlighted the reference in paragraph 14.46 for a Playing Pitch Strategy to support decisions on supply and demand and support decisions on need particularly around new developments and any potential loss of playing fields.

English Heritage claimed that there needs to be a proper assessment of Lytham Hall and its surrounding historic park and garden and associated listed buildings, and that these should be identified in the Spatial Portrait of Fylde and the area descriptions.

A residential developer disagreed with the requirement in the policy to double the public open space required on developments of 100 dwellings or more. They added that this requirement has not been supported by an up-to-date assessment of open space provision in the Borough. The respondent suggested that there should be flexibility in the policy for the developer to Masterplan the public open space, as each site has its individual characteristics and constraints, and there are differing levels of existing open space provision in each area.

The resident added that having a default requirement to provide double the normal open space on larger developments will constrain the design of schemes and have the potential to increase densities and lower private garden spaces on sites constrained by natural influences such as woodlands and water bodies; and that this approach is also not compliant with Community Infrastructure Levy, Regulation 122, and needs viability testing.

The Home Builders Federation claimed that the policy had not been positively prepared and was therefore unsound. They said that the policy does not identify how the Council will deal with applications where there is an identified over-provision of open space. They added that in areas where there is an identified surplus of open space, developers should not be required to provide a contribution towards open space unless it can be evidenced that the development would, in itself, create a need taking account of the existing surplus. They added that this needs to be based on an up-to-date Open Space Study and Viability Testing.

The Home Builders Federation suggested that the costs associated with the requirement for open space provision need to be considered as part of an economic viability assessment of all plan policies and obligations. A resident said that green infrastructure should have biodiversity value.

Council response

The Council does not agree that larger developments should have the flexibility to Masterplan public open space as the site determines, rather than having a default requirement. The policy allows the payment of a commuted sum to help provide additional or improved open space nearby, where it is agreed with the Council that the open space would be better provided off-site.

The Council agrees that the policy needs to be informed by an up-to-date Open Space Assessment. It is anticipated that an up-to-date Open Space, Sport and Recreation Study will inform the policy at the Local Plan – Publication stage. The Council agrees that the policy should identify how the Council will deal with applications where there is an identified over-provision of open space.

The Council agrees that the policy needs to be subjected to viability testing. A Viability Assessment has been undertaken on the Local Plan – Preferred Options document since it was published for consultation, and it is anticipated that further viability testing will take place before Publication. The findings of the viability testing will inform any required changes to the policy.

The Council agrees with Sport England that, as currently worded, it is not clear whether policy ENV3 of the Preferred Options document includes outdoor sports facilities. The Council agrees to clarify the wording in Policy ENV3 on open space and infrastructure and to create a separate, additional policy on indoor and outdoor sports facilities, which will be included within the Health and Wellbeing chapter (chapter 11) of the next version of the Local Plan.

The Council agrees with Lancashire Sport Partnership Ltd that the reference in policy ENV3 of the Preferred Options document to “facilities for children’s play” relates to playgrounds and Multi-Use Games Area(s) and that this should be clearly set out in the policy. The Council agrees to amend the reference in paragraph 14.32 to the Open Space, Sport and Recreation Study 2008 when the Study has been updated. The Council agrees that the reference in paragraph 14.34 to “close to”, is open to interpretation and it should be deleted. The Council agrees with Lancashire Sport Partnership Ltd over the need for an up-to-date Playing Pitch Strategy, as part of the evidence base to the Local Plan.

The Council agrees with Blackpool Council that the reference in policy ENV3 of the Preferred Options document to “*financial contributions will be sought through the Community Infrastructure Levy*”, would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council.

However, it is considered that the wording should be retained and be carried forward in the policy in the next version of the Local Plan, if the viability testing resolves that Community Infrastructure Levy is viable and allows the implementation of the Levy.

The Council agrees that further cross-boundary working with Blackpool Council (and Wyre Council) will be required so as to enable the development of a strategic network of green infrastructure across the Fylde Coast. This would be achieved by adding a new paragraph at the end of policy ENV3 of the Preferred Options document referring to cross-boundary working.

Recommendations for change

- Amend part of the first sentence of policy ENV3 of the Preferred Options document to read “... the provision of amenity open space with facilities for children’s play (i.e. playgrounds and Multi Use Games Areas), where appropriate, will be required to the following minimum standards:”
- The policy will be amended to ensure that policy ENV3 of the Preferred Options document identifies how the Council will deal with applications where there is an identified over-provision of open space.
- Add a new sentence at the end of policy ENV3 of the Preferred Options document saying: “Further cross boundary working will be required so as to enable the development, delivery and implementation of a strategic network of green infrastructure (including green space and blue space) across the Fylde Coast”.
- Draft a separate, additional policy on indoor and outdoor sports facilities, to be included within the Health and Wellbeing chapter (chapter 11) of the next version of the Local Plan.
- Amend the second sentence of paragraph 14.34 to read: “Where provision is made off-site, it should be ~~in a location close to, and where it would be~~ of direct benefit to, the occupiers of the new development.”

Policy ENV4: Management and Enhancement of Open Space and Green Infrastructure

Number of representations:

Comment	Support	Object	Total
4	1	0	5

Representations received from:

- Campaign to Protect Rural England (CPRE) – Fylde District
- Environment Agency
- Lancashire Wildlife Trust
- BAE Systems Real Estate Solutions
- Blackpool Council

What you said

The Environment Agency supported this policy, saying that it could facilitate funding for green infrastructure management.

Blackpool Council suggested that reference to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council.

BAE Systems Real Estate Solutions supported the proposal for the Coastal Parkway, and would wish proposals for this initiative to be aligned with the operational requirements of Warton Aerodrome.

CPRE – Fylde District said that they commended the protection to be given to the existing open space network in Fylde.

Lancashire Wildlife Trust welcomed the proposed use of the Community Infrastructure Levy for the management of green infrastructure, although they said that much would depend upon the Community Infrastructure Levy rate applied to various forms of development and on the Council's priorities. Lancashire Wildlife Trust commented that they would be very surprised if the Community Infrastructure Levy would produce sufficient finance for green infrastructure, therefore there could be a need to include other forms of funding e.g. s106 agreements (while still available). They added that such management agreements would need to be tied into some form of legal agreement which should be able to require payment.

Council response

Comments in relation to the Coastal Parkway Masterplan and alignment with the operational requirements of Warton Aerodrome have been forwarded to the Leisure, Culture and Sport Department at Fylde Borough Council, which is preparing the masterplan.

The Council agrees with Blackpool Council that the reference in the Preferred Options document to “financial contributions will be sought through the Community Infrastructure Levy” would seem to prejudge the outcome of the Viability Assessment as to whether Community Infrastructure Levy is viable and is to be implemented by the Council. However, it is considered that the wording should be retained and be carried forward in the policy in the next version of the Local Plan if the viability testing resolves that Community Infrastructure Levy is viable.

The Council agrees that further sources of funding for green infrastructure should be referenced in the policy and / or justification.

Recommendations for change

- Amend the first sentence of policy ENV4 of the Preferred Options document to read: "Financial contributions will be sought through the Community Infrastructure Levy and consideration will be given to further sources of funding for the management and enhancement of open space and green infrastructure, including the Ribble Coast and Wetlands and the Coastal Parkway".

Policy ENV5: Heritage Assets

Number of representations:

Comment	Support	Object	Total
2	1	3	6 ²⁹

Representations received from:

- Ribby with Wrea Parish Council
- English Heritage
- Lancashire Wildlife Trust
- Lytham St Annes Civic Society

What you said

Ribby with Wrea Parish Council generally agreed with the Preferred Options version of the Local Plan and fully supported the protection of heritage aspects, rural ambience / landscape character.

English Heritage suggested the section title should be amended to read “Preserving and Enhancing the Historic and Built Environment and Achieving Good Design.” The historic environment should be considered in delivering a number of other planning objectives.

English Heritage disagreed with paragraph 14.52 as there has been no proper, accurate assessment of the significance of the historic environment in the area and the contribution it makes to the Borough (NPPF, paragraph 169). This is reflected throughout the Plan. The Plan needs to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area. This will then inform this policy.

English Heritage commented that there has been no proper accurate assessment of the significance of the heritage assets in the area and the contribution they make to the Borough (NPPF, paragraph 169) within the Plan. Paragraph 14.56 is the first time that any attempt to detail the historic environment in the Borough has been made.

English Heritage welcomed the list of assets in the area. This paragraph should be amended to accurately detail the historic assets in Fylde, i.e.:

“Listed buildings – 197

Grade I – 1

Grade II* - 5

Grade II – 191

Registered Parks and Gardens – 3

Scheduled monuments – 0

Conservation Areas – 10

Building at Risk – 1

There is also the potential for undesignated archaeological sites”.

English Heritage welcomed the recognition in paragraph 14.54 (although late in the Plan) that “Fylde boasts a rich and varied built environment including sites and buildings of historic and architectural interest.” English Heritage claimed that there has been no proper, accurate assessment of the significance of the heritage in the area and the contribution they make to the Borough (NPPF, paragraph 169). English Heritage went on to claim that the Plan has failed to do this and therefore, as this has not been undertaken it would not reinforce the statement made in this paragraph that they “make a valuable contribution to economic and

²⁹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

social wellbeing as well as providing a focus for heritage-led regeneration and tourism development". English Heritage suggested that this needs to be reflected also in the relevant policies in the Local Plan.

English Heritage commented that the Local Plan needs to be expanded to explicitly detail the heritage assets and historic environment in the Borough and make an assessment of their contribution to the area. English Heritage claim that this will then inform policy ENV5 of the Preferred Options document.

English Heritage suggested that whilst there was nothing wrong with relying on the provisions of the NPPF, this does not accord particularly well with the approach which is being advocated within the NPPF – that the planning system should be plan-led. Indeed there appears to be an expectation within the NPPF that, with a compliant plan in place, there will be no need for those using it to have to look again at the NPPF in making decisions on development proposals (see, for example NPPF, paragraph 14).

English Heritage suggested that as drafted, policy ENV5 of the Preferred Options document does not expand a great deal upon national policy guidance as set out in the NPPF. Consequently, English Heritage claimed that policy ENV5 does not provide sufficient detailed guidance to enable those proposing schemes likely to affect Fylde's heritage assets to determine their likely degree of success. Nor does it greatly help those determining such schemes to understand what considerations should be taken into account in reaching a decision about the appropriateness of the development proposals.

As a result, English Heritage suggested that Policy ENV5 of the Preferred Options document, does not comply with the requirements of the NPPF. It does not provide any certainty about how planning applications on planning proposals will be determined (NPPF, paragraph 17); it is not made clear how the presumption in favour of sustainable development will be applied locally in terms of the historic environment (NPPF, paragraph 15); and it does not provide clear policies on what will or will not be permitted or provide a clear indication of how a decision-maker should react to a proposal (NPPF, paragraph 154).

English Heritage suggested rewording policy ENV5 of the Preferred Options document including the following elements: a clear explanation of the considerations and approach to development proposals affecting each of the different heritage types, including locally-important heritage assets. A clear statement of the approach and requirements for proposals affecting nationally important archaeology, and other archaeological remains.

English Heritage set out the following wording of a possible Policy:

"Proposals for development should protect and, where appropriate, enhance or better reveal those elements which contribute to the significance of the Borough's heritage assets:-

Conservation Areas

Proposals affecting a Conservation Area should preserve or enhance those elements that have been identified in the respective Conservation Area Appraisal as making a positive contribution to their special character or appearance.

Demolition or other substantial loss to the significance of a building or feature that contributes positively to the Conservation Area will be permitted only where this harm is outweighed by the public benefits of the proposal.

Development that would result in harm to a public or private open space that contributes positively to the character of a Conservation Area will be permitted only where this harm is outweighed by the public benefits of the proposal.

Historic Parks and Gardens

Proposals affecting a Historic Park and Garden should ensure that development does not detract from the enjoyment, layout, design, character, appearance or setting of that

landscape, cause harm to key views from or towards these landscapes or, where appropriate, prejudice their future restoration;

Archaeological remains

Development which would result in harm to the significance of a nationally-important archaeological site will not be permitted.

The preservation of other of archaeological sites will be an important consideration. When development affecting such sites is acceptable in principle, the Council will seek to ensure mitigation of damage through preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavating and recording before or during development (NB. Scheduled Monuments have been excluded as the Borough does not have any).

Listed Buildings

Listed Buildings and their settings will be preserved and, where appropriate, enhanced. Loss of any significance should be minimised, and will be permitted only where any harm is justified by the public benefits of the proposal.

The total or substantial demolition of a listed building will be permitted only in exceptional circumstances.

Locally-important heritage assets

Development which would remove, harm or undermine the significance of a locally-important heritage asset, or its contribution to the character of the area will only be permitted where the public benefits of development would outweigh the harm”.

Lancashire Wildlife Trust commented that the natural environment is excluded from the policy; and that some heritage assets also coincide with natural environment assets.

Lytham St Anne’s Civic Society supported the need for stronger and enforceable regulations relating to Conservation Areas and Listed Buildings. The Civic Society claimed that a high standard of design should be enforced in all areas and we should not lose significant heritage buildings in Conservation Areas.

Council response

The Council agrees with English Heritage that the section title should be amended to include the “Historic Environment”.

In terms of the heritage evidence base, the Council is in the process of adopting a borough-wide Heritage Strategy that will form part of the evidence base for the Local Plan. The Strategy has been completed and agreed by Cabinet, but the Action Plan still has to be achieved. The Heritage Strategy sets out a strategic framework for future heritage works streams, including a statement of intent to undertake conservation area appraisals and management plans where relevant.

The Council agrees with English Heritage that paragraph 14.56 of the Preferred Options document should be amended to accurately detail the Listed Buildings in Fylde, i.e.:

Listed buildings – 197

Grade I – 1

Grade II* - 5

Grade II – 191

Building(s) at Risk – 1

The Council agrees with English Heritage to insert additional text in chapter 14 on the heritage assets of Fylde including Listed Buildings, Conservation Areas, Registered Parks and Gardens, scheduled monuments and undesignated archaeological sites.

The Council agrees to replace the text in policy ENV5 of the Preferred Options document taking into consideration the wording proposed by English Heritage, which sets out the Borough's heritage assets and focusses on them in turn, i.e. Listed Buildings, Conservation Areas, archaeological remains, and locally important heritage assets.

The Council considers that there is no need to add 'Natural Environment' into the section title as policy ENV5 deals with heritage assets, i.e. the Historic and Built Environment. The Natural Environment will be dealt with in an additional new policy ('Biodiversity'). The Council considers it sufficient for Natural Environment to be referred to in the title to chapter 14.

The Council agrees to make reference to the Lancaster Canal in policy ENV5 of the Preferred Options document, as it is an important heritage asset, which runs through part of Fylde and requires protection.

Recommendations for change

- Amend the sub-section title to read: "Preserving and Enhancing the Historic and the Built Environment".
- Amend paragraphs 14.55 and 14.56 of the Preferred Options document to deal solely with Listed Buildings and to read: "Listed Buildings are protected by legislation and English Heritage keeps an up-to-date register of all listed buildings and those at risk. Fylde contains 197 Listed Buildings (of which one is Grade I, five are Grade II* and 191 are Grade II). The one Grade I Listed Building in the Borough is on the English Heritage Building at Risk register."
- Insert additional text in the introductory text and the justification to policy ENV5 of the Preferred Options document in chapter 14 on the heritage assets of Fylde including: Listed Buildings, Conservation Areas, Registered Historic Parks and Gardens, scheduled ancient monuments and undesignated archaeological sites.
- Insert additional text in the introductory text and the justification to policy ENV5 of the Preferred Options document referring to a local list of buildings, heritage statements, the importance of the public realm and cross boundary working on heritage issues.
- Redraft policy ENV5 of the Preferred Options document to reflect English Heritage's concerns.
- Include a reference to the Lancaster Canal in policy ENV5 of the Preferred Options document.

Policy ENV6: Good Design in New Development

Number of representations:

Comment	Support	Object	Total
3	2	2	7

Representations received from:

- English Heritage
- Environment Agency
- Home Builders Federation

- Lancashire Wildlife Trust
- Lytham St Annes Civic Society
- 2 residential developers

What you said

The Environment Agency supported the policy as it will secure landscape provision and public open space, creating new green infrastructure resources.

English Heritage welcomed the inclusion of the policy and suggested a wording alteration to criterion (b) to reflect NPPF: “Safeguarding and enhancing” should be amended to read “conserve and enhance”.

Lancashire Wildlife Trust suggested criterion (h) of policy ENV6 should be strengthened to include protecting and enhancing existing habitats and providing linkages to the wider ecological networks.

Lytham St Annes Civic Society raised a number of concerns, mainly that the new built environment is not given sufficient prominence in the Local Plan. The need for housing may override other considerations with design and density suffering. The Civic Society referred to key local character, including symmetrical terraces, usually with distinctive central and end houses which is ignored when extensions and porches are permitted. Rear access roads to allow discreet parking and rubbish collection was also mentioned. A key local developer uses the same housing type on its sites with little respect paid to local character in larger developments. The Civic Society also commented on development being built closely together with little green space or tree cover.

The Civic Society also raised the following issues: affordable housing becoming increasingly smaller; open space on certain new estates is fenced-off or is a lake; new developments are littered with cars; and developments are built closely together with little green space or tree cover.

The viability of the policy was questioned by the Home Builders Federation and a residential developer who then concluded that the policy was unjustified and unsound. The Home Builders Federation suggested the policy should be considered as part of a viability assessment of the plan as a whole.

The Home Builders Federation and a residential developer suggested that the policy largely replicated other policies within the Local Plan e.g. H1, ENV1 and ENV5 of the Preferred Options document. The Home Builders Federation claimed there was a conflict between criteria (e) and policy H1, requiring higher densities in areas with good transport.

The Home Builders Federation and a residential developer suggested criteria (j) of the policy should encourage developers and not be mandatory.

A residential developer opposed reference to no development being permitted within Flood Risk Zones 2 and 3, arguing that some development is suitable in Flood Risk Zones 2 and 3 and the Sequential and Exceptions Test in NPPF Technical Guidance should be used to determine the appropriateness of each individual development and its location in regards to flood risk issues. The residential developer also suggested that the policy seems to conflict with policy CL1.

Another residential developer considered that if a site is located within Flood Risk Zone 2 or 3, they should not be included in the plan. They recommended the identification of alternative sites, and that consideration should be given to including allocations within rural villages.

Council response

The Council agrees to the amendments suggested by English Heritage and the strengthening of the policy wording by Lancashire Wildlife Trust.

The Council agrees with Lytham St Annes Civic Society that the built and natural environment should be given greater prominence in the Local Plan and consequently it is considered necessary and appropriate to move the design policy (policy ENV6) up to chapter 8 – General Development Policies, to become the new policy GD5 in the next version. In addition, the Council considers that an additional criterion should be added to the policy to address the Civic Society's concerns about the quality of developments to ensure that the opportunity is taken for developments to make a positive contribution to the character and local distinctiveness of the area through high quality design, which responds to its context.

A viability study of the Local Plan Preferred Options document has been completed and submitted to the Council. This looks at the viability of all emerging policies and the Local Plan as a whole. The findings will feed into the Local Plan (Part 1).

The Council will look to resolve any policy conflicts and / or omissions prior to issuing the next version of the Local Plan.

Comments in relation to excluding strategic sites in Flood Risk Zones 2 or 3 are dealt with in policy SD1 in chapter 6.

The Environment Agency's recommended wording for policy SD1 in chapter 6, suggesting that some development is appropriate in Flood Risk Zones 2 or 3 is also recommended for inclusion in policy ENV6 of the Preferred Options document, so as to resolve the residential developers concern with this policy and ensure consistent wording throughout the Local Plan.

The Council agrees with the residential developer that the last sentence of policy ENV6 of the Preferred Options document conflicts with policy CL1, regarding development in Flood Risk Zone 2 or 3. The Council will amend the policy accordingly.

The Home Builders Federation and a residential developer suggested criterion (j) of the policy should encourage developers and not be mandatory. The DCLG is currently carrying out a review of Housing Standards, which includes the Building for Life 12 standards and it is highly probable that all of the standards will be removed from the Planning system and will be dealt with by Building Regulations. Consequently, the Council agrees with the Home Builders Federation.

The Council is proposing to delete policy CL4 on Sustainability Statements from chapter 13 as it is picked up in the NPPF, but to retain 2 criteria from this policy and add them to policy ENV6 of the Preferred Options document. The 2 criteria are:

- "Reduce energy consumption through energy efficiency measures;
- Install renewable and low-carbon energy generation technology."

The Council considers that policy ENV6 of the Preferred Options document, which will be moved into the General Development chapter and become policy GD5 in the next version of the Local Plan, should also refer to good design in highways and infrastructure projects. The following new criterion should be added to the policy: “The layout, design and landscaping of all elements of the proposal, including any internal roads, car parking, footpaths and open spaces, are of a high quality and respect the character of the site and local area”.

Recommendations for change

- Move policy ENV6 and its supporting text / justification up to chapter 8 (General Development Policies) to become policy GD5 in the next version of the Local Plan.
- Delete the word “New” from the title of policy ENV6 and from the sub-heading that precedes the policy. The text should read “Good Design in Development”. The first paragraph of the policy will also be amended to read: “Development will be expected to be of a high standard of design ...”
- Amend criterion (b) of policy ENV6 of the Preferred Options document to read ‘Conserving and enhancing the built and historic environment’.
- Amend criterion (h) to read: “Providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, protecting and enhancing habitats, and providing linkages to the wider ecological networks, providing open space and enhancing the public realm”.
- Amend criterion j) to read: “Encouraging developers to conform to Building for Life 12 standards for well-designed homes and neighbourhoods”.
- Add a new criterion: “Taking the opportunity to make a positive contribution to the character and local distinctiveness of the area through high quality new design that responds to its context.”
- Add the following new criterion in policy ENV6 of the Preferred Options document: “The layout, design and landscaping of all elements of the proposal, including any internal roads, car parking, footpaths and open spaces, are of a high quality and respect the character of the site and local area.”
- Add a new criterion to policy ENV6 of the Preferred Options document: “The development should not prejudice highway safety, pedestrian safety, the free flow of traffic, and would not reduce the number of on-site parking spaces to below the standards stated in policy T4 - Parking Standards, unless there are other material considerations which justify the reduction. Any new roads and / or pavements provided as part of the development should be constructed to an adoptable standard.”
- Add the following criterion to policy ENV6 of the Preferred Options document from policy CL4 (It is proposed to delete policy CL4 as the issues are covered in the NPPF): “Measures to improve the energy performance of buildings will be encouraged in accordance with the following hierarchy: a) Reduce energy consumption through energy efficiency measures. b) Install renewable and low-carbon energy generation technology.”
- Amend the last sentence of the policy to read “Inappropriate development in Flood Risk Zones 2 or 3 should be avoided”.

Chapter 15: Next Steps

Chapter 15 General Comments:**Number of representations:**

Comment	Support	Object	Total
2	0	0	2

Representations received from:

- AXA Insurance
- 1 resident

What you said

AXA Insurance welcomed the opportunity to comment on the Preferred Options document. They embraced the Local Plan process and supported the delivery of more housing within Fylde.

A resident suggested the need for regeneration / landscaping scheme at the Warton shopping parade would provide a focus to the centre. Chequers social club and offices were suggested for retail and community facilities. A masterplan for Warton is needed with higher quality design for new development and public realm. Cycling routes were suggested by the resident, linking Warton to Wrea Green.

Council response

Comments from AXA Insurance are noted.

Comments in relation to the regeneration / landscaping needs of Warton are dealt with under Policy SL3 in chapter 7.

Recommendations for change

- None

Glossary and Appendices

Glossary General Comments:

Number of representations:

Comment	Support	Object	Total
4	0	0	4

Representations received from:

- Environment Agency
- The Theatres Trust
- Treales, Roseacre and Wharles Parish Council
- Lytham St Annes Civic Society

What you said

The Environment Agency recommended amending the definition of the exception test to read: “If, following the application of the Sequential Test, it is not possible for development to be located in zones with a lower probability of flooding, the exception test should be applied if necessary”.

The Environment Agency also suggested the inclusion of a definition of “Main River” watercourses in the glossary to ensure that people are aware of what this means and that separate legislative controls will apply to these watercourse. The definition to read: “Main Rivers, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the main river watercourse”.

The Theatres Trust supported the inclusion of “community facilities” in the glossary. They suggested a more succinct description and recommended: “community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community”. The improved description in the glossary would remove the need to define community facilities in policies INF1 and INF2.

Treales, Roseacre and Wharles Parish Council suggested “rural worker” should be defined.

Lytham St Annes Civic Society referred to three definitions of “sustainability” in the glossary and suggested these are omitted and a true description of what is really meant is used instead.

Council response

The Council agrees to the alternative definition of “community facilities” as suggested by The Theatres Trust. The reference to “community facilities” in policies INF1 and INF2 will be rationalised to refer to the amended definition in the glossary.

Members Decision

Should the Council define 'rural worker'. If so the definition, needs to be broad and not classify particular occupations. Defining what is classed as an essential need. NPPF is clear in that it no longer retains the traditional definition.

Members agreed at the LPSG meeting on 10th June 2014 that there should not be a definition of rural worker in the Local Plan. It was agreed that it should be left to the discretion of the Development Management Committee when determining individual planning applications.

The Council agrees to the alternative definition of the exception test and the inclusion of "Main Rivers" in the glossary as suggested by the Environment Agency.

The glossary includes a definition of "Sustainability Appraisal", "Sustainability Statements" and "Sustainable Development". It is not possible to rationalise this into one definition as it refers to three separate aspects of sustainability.

Recommendations for change

- Amend the definition of exception test to read: "If, following the application of the Sequential Test, it is not possible for development to be located in zones with a lower probability of flooding, the exception test should be applied if necessary".
- Amend the definition of community facilities to read: "community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community."
- Rationalise the definition of "community facilities" in policies INF1 and INF2 to refer to the amended definition set out above.

- Add the following definition of an integral garage in the Glossary: “An integral garage is a building for parking vehicles, attached to another building, such as a house. Typically, integral garages have three walls, a roof and a door opening large enough for vehicles to enter the building. Select integral garages also have doorways from the garage to the connecting building.”
- Add “Main Rivers” to glossary to read: “Main Rivers, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of the main river watercourse”.
- Delete the definition of Main Rivers from the footnote on page 140 of chapter 13 of the Preferred Options document.

Appendix 1: Schedule of saved Fylde Borough Local Plan (FBLP) policies

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- Treales, Roseacre and Wharles Parish Council

What you said

Treales, Roseacre and Wharles Parish Council queried the replacement of certain policies:

- Policy EC3 and H6 are complete replacements for SP10, SP11, SP12, SP13 – Agricultural Workers Dwellings, Rural Business Set Up.
- Policy H6 is a complete replacement for policy SP14.
- Policy HL4 is a complete replacement for policy H5.

Council response

In response to the comments made by Treales, Roseacre and Wharles Parish Council, the Council has drafted a number of policies (policies EC3 and H6 in the Preferred Options document), which take forward issues covered by policies from the existing Fylde Borough Local Plan (as altered) in October 2005, so as to ensure that there are robust, flexible and up-to-date policies in place in the new Local Plan (Part 1), which will replace the existing Local Plan. Development Management officers will need robust policies in the development plan for dealing with planning applications for agricultural workers dwellings (covered in the existing Local Plan under policies SP10, SP11 and SP12), and stables and equestrian centres, kennels and catteries (covered in the existing Local Plan in policy SP13). Policy H6 of the Preferred Options document takes forward parts of policy SP14 (special needs dwellings) and policy HL4 (enlargement and replacement of rural dwellings) from the existing Local Plan, which will be replaced in part by the new Local Plan (Part 1). Similarly, policy H5 of the Preferred Options document takes forward policy HL4 (enlargement and replacement of rural dwellings), but also focusses on and provides criteria for determining applications for the development of isolated new homes in the countryside.

Recommendations for change

- Amend the reference under contaminated land to read: "paragraphs 120 and 121" of the NPPF.

Appendix 2: Development of the Spatial Option and Strategic Sites Assessment

Number of representations:			
Comment	Support	Object	Total
4	0	13	17 ³⁰

Representations received from:

- Home Builders Federation
- BAE Systems Real Estate Solutions
- Treales, Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- Councillor Brickles
- 10 Residents
- 1 residential developer

What you said

Additional suggested sites

Table of additional suggested sites

Suggested Site	Specific comments
1. AXA Insurance	Claimed that they own land that is deliverable and developable and are willing to bring this land forward for housing. AXA Insurance supported the need to bring forward housing, but that they believe the strategy for Lytham St Annes is flawed as it does not allow for a range and choice of sites and focuses too much development in one location. They gave the view that the SHLAA has incorrectly assessed the deliverability of this site.
2. Land West of Leech lane St Annes (7.60 Ha)	<p>A mixed use developer suggested a site at Leach Lane, St Annes. The need to allocate additional housing sites in sustainable locations would justify the removal of the site from the Green Belt.</p> <p>BBP2 commented that although the Plan allocates sites in the Lytham St Annes area, they consider that this is not likely to be sufficient to meet this area's needs, and will therefore require the release of sustainable Green Belt land. They suggested that BBP2's site on the edge of St Annes is a sustainable site which could be released for housing without harming the Green Belt.</p>

³⁰ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

3. Blackpool FC Training Ground, Martin Avenue, Lytham St Annes (2.61Ha)	Further site suggested at Blackpool Football Club Training Ground, (by consultants)
4. Victoria Hotel, Church Road, Lytham St Annes (0.23Ha)	A residential developer suggested the inclusion of a site adjacent to Church Road and amendment of the Green Belt boundary at this location which would provide a logical extension to the urban area and a realistic, sensible and long-term Green Belt boundary.
5. Land North and West of Clifton (7.20Ha)	A residential developer suggested two sites at Clifton for residential development.
6. Land north of 43 Stanagate, Clifton (0.82Ha)	A residential developer suggested two sites at Clifton for residential development.
7. Land West of Cropper Road, Westby (19.15Ha)	Cllr Ashton and residents suggested Land West of Cropper Road.
8. Former Campbell Caravans, Blackpool Road, Kirkham (1.00Ha)	Residents suggested Campbell Caravans as an alternative.
9. Sunnybank Mill, Kirkham (1.08Ha)	Residents suggested Sunnybank Mill, Kirkham as an alternative.
10. Great Birchwood, Lytham Road, Warton (8.22Ha)	<p>A landowner suggested Great Birchwood Country Park, Warton as an alternative secondary school location on previously developed land (brownfield). The response referred to paragraph 69 of the NPPF which suggests development on previously developed land in the Green Belt can be appropriate.</p> <p>Some residents questioned why the Great Birchwood site keeps being rejected for housing, and that if the site is Green Belt land, whether or not the strategic sites at Warton are also Green Belt land? Two residents confirmed that the owners of the Great Birchwood site, which is brownfield land in the Green Belt, believe that this could and should be built on.</p>
11. Land North of Freckleton (29.38Ha)	Two residents commented that it is too late to leave a review of the Green Belt until the Local Plan Part 2. They said that some Green Belt might be more appropriately classed as greenfield, allowing other opportunities for development. They added that Green Belt land north of Freckleton could be used for housing, as the land has good access to the Freckleton bypass and the future M55 Link Road (i.e. the Preston Western Distributor Road); has good bus routes; and would boost Freckleton. Some residents suggested some of the development should occur at Freckleton, some suggested the area to the north of the bypass as an alternative.

<p>12. Kirkham Grammar School Playing Fields, Blackpool Road, Kirkham (4.44Ha)</p>	<p>Commented that the allocation and development of their off-site playing fields for residential purposes will assist in achieving a number of aspects of the Vision, including the provision of 'decent and affordable homes,' 'sufficient open space and... outdoor recreational facilities' and 'new homes of an appropriate type and mix to address affordability, an ageing population and family needs will be located in suitable locations.'</p> <p>The strategic objectives of the Local Plan will be met by the allocation and development of the Kirkham Grammar School playing fields site for housing.</p>
<p>13. Land at Peel Road Peel, Westby (22.29Ha)</p>	<p>A residential developer claimed their client owns land within the Blackpool Periphery area (Land at Peel, Blackpool) and would like these sites to be included with the sites identified by policy SL2. These sites are similar and immediately adjacent to those already identified (in particular site M1) and they can make a contribution to housing and potentially employment land supply (in total the sites are approximately 20 hectares in size) alongside those already identified. The clients' sites were considered as part of the SHLAA within the settlement extension section. Their clients' sites were therefore partly considered as potentially suitable in the SHLAA but have been excluded from the emerging Allocations. Given that their clients' sites were considered as potentially suitable alongside sites that have been included under policy SL2 (in particular M1 Land East of Cropper Road), it is unclear why their clients' sites have been excluded from the allocations. It is evident that future development in this locality can further support the critical mass for services in this area including schools, shops and public transport provision that the area is currently lacking. The allocation of their clients' sites would therefore assist in making the area far more sustainable in the medium and longer term.</p> <p>In the vicinity of their clients' sites there have been a number of recent planning permissions for residential / mixed use development. These permissions include on site M1 itself (12/0717), at West Field nurseries and land off St Anne's Way. In granting permission for these developments, the Council has demonstrated that these sites are considered an appropriate location for development at the present time. Therefore, their clients' sites (of which part is used as a caravan park and is therefore a brownfield site) should be considered just as favourably. It is also worthwhile to note that Paragraph 14 of the NPPF states that LPA's should positively seek opportunities to meet the development needs of their area and this is a site which can meet such development needs. Overall, the sites are partially brownfield land, have not identified constraints in their development (in terms of flooding, access, ownership and</p>

	could be developed quickly) and their development alongside other sites will significantly assist the creation of a sustainable community. This critical mass of development provides the opportunity for new facilities for local residents including potentially a school, shops and services, employment uses and improved public transport.
14. Peel Hill Farm, Preston New Road, Westby (33.48Ha)	A residential developer suggested their site (Peel Hill Farm, part of H6) has similar credentials to Whyndyke Farm and disagree with the Sustainability Appraisal site comments and Local Plans reasons for exclusion. The Fylde-Blackpool Periphery is one of the Borough's most sustainable locations and should be a principal focus of new development. Peel Hill Farm is no more detached from the existing built-up area than Whyndyke Farm, both being on the opposite side of Preston New Road. It is also suggested that Peel Hill Farm is no more visually intrusive than Whyndyke Farm, the former being bounded to the east by Carr Bridge Wood and the latter being bounded to the east by Wildings Hill Wood. Other issues raised in relation to the non-identification of Peel Hill Farm as a strategic site, such as contributions to primary education, the loss of greenfield land, archaeological significance, drainage, peat and air quality, are equally applicable to Whyndyke Farm.
15. Land East of Wesham (29.55Ha)	SHLAA site WS08 is suggested by a residential developer for housing. The Councils justification for not including this site, as identified in appendix 2 were suggested as being flawed with access through site H13. A resident suggested site H17 (Land East of Wesham) is deliverable and sustainable and the highway issues could be resolved.
16. Land adjacent Kirkham Prison, south of A583, Kirkham (38.19Ha)	Some residents suggested land south of the A583 Preston – Blackpool Road as an alternative site for housing.
17. Land at Blackpool International Airport, South of Runway (25.26)	(put forward by consultants on behalf of Blackpool Airport)
18. Land opposite Kirkham Trading Park, Freckleton Road, Kirkham (8.99Ha)	Landowner put site forward.

Treales, Roseacre and Wharles Parish Council suggested there should be a formal presentation of the proposed option in the same way as conducted for the original 5 options offered in previous consultations.

Windfall allowance

The Home Builders Federation raised concern over the fact there appears to be no evidence to justify inclusion of a windfall allowance at 30 dwellings per annum. They suggested the NPPF does not specify that windfall allowances can be included beyond the first 5 years of the plan period. Refer to the Selby Core Strategy Inspector's report and removal of windfall allowance from annual plan targets. It is important that the delivery of windfall sites is carefully monitored, failure would require the Council to consider releasing other sites.

Housing requirement

A resident stated that the borough's housing requirement should be reviewed to include the latest Office for National Statistics household projection figures and backlog not included.

Kirkham and Wesham

Some residents in relation to this section of the document, objected to the inclusion of land in Kirkham, and specifically referenced site H7 (Dowbridge). Issues raised included loss of best and most versatile agricultural land, flood risk, wildlife and landscape impact, historical remains, insufficient highways infrastructure and school places provision, and the oversupply of housing. Whyndyke Farm was suggested as an alternative site for the housing.

Warton

BAE Systems Real Estate Solutions suggested proposals for Warton to be elevated as a key service centre should be set out clearly within the main Local Plan document, particular in chapters 6, 7 and 9.

Bryning with Warton Parish Council stated that Warton does not have the local services, retail, and commercial or highways transport access to be a local service centre. Warton is not at an equivalent level to Freckleton or Kirkham for service provision. It will not be a key service centre on a par with Lytham and St Annes by 2030. A greater availability of facilities and open recreational green space should be available for the community to meet the vision for Fylde but these should be in keeping with the 'rural' nature of the village. Warton should not be elevated to a key service centre. Open green space along Lytham Road, west of the settlement boundary in the area designed H8, Riversleigh Farm should be identified and allocated for recreational open space in accordance with chapter 14. Financial provision should be sought via Community Infrastructure Levy as an identified need.

Cllr Brickles and a resident commented on the reference to Warton becoming a key service centre, which had been agreed at a Local Plan Steering Group meeting to be deleted and remain as a local service centre.

BAE Systems Real Estate Solutions suggested Warton Aerodrome and the Enterprise Zone should provide opportunities to build and diversify the local economy. There may be land within the aerodrome which could provide opportunities for retail and community facilities in Warton. There could be opportunities to utilise brownfield land and existing infrastructure on site as part of mixed use redevelopment.

A resident raised concerns over highways infrastructure, the proposed Preston Western Distributor Road is irrelevant, traffic impact is connected to the entrance to the employment site causing problems. An increase in resident numbers will exacerbate this and there is a potential accident risk.

In addition, the following comment was made at the full council meeting - Councillor Alan Clayton proposer; Councillor Keith Beckett seconder: add the following to the 'Challenges' Table on page 199 in relation to "H13 – Land north of Mowbreck Lane, Wesham (housing):"to be deferred subject to the Decision of the Secretary of State".

Council response

The Council will consider additional sites put forward as it works towards the next version of the Local Plan. All sites will be included in the next SHLAA update, non-strategic sites will be considered in the Local Plan (Part 2).

Comments relating to the Housing Requirement are dealt with in chapter 6.

The Council will provide the latest position on site H13 – Land north of Mowbreck Lane, Wesham (housing) in the next version of the Local Plan (Part 1).

The comment in relation to the consultation events is addressed in the summary of consultation under the heading “consultation evaluation”.

Comments in relation to Warton becoming a key service centre over the course of the plan period are dealt with in the Vision in chapter 3.

Bryning with Warton Parish Council, Cllr Brickles and a resident’s comments on the status of Warton as a key / local service centre have been dealt with in the Vision in chapter 3.

Comments in relation to Warton, open space provision at site H8 and mixed-use redevelopment at BAE Systems, Warton are dealt with under policy SL3 in chapter 7.

A resident’s concerns over highways infrastructure and safety in the Warton Strategic Location for Development are dealt with under policy SL3 in chapter 7.

An Infrastructure Delivery Plan is being prepared alongside the Local Plan (Part 1), to assess what transport, social, green and energy infrastructure and services will be required to support the development proposed in the Plan, including details of costs, funding and delivery.

The proposal to allocate employment land at BAE Systems Warton, for mixed use is a Members Decision, which is highlighted under policy SL3 in chapter 7 and repeated below:

Members Decision

Mixed use development

Should there be a mixed use and / or employment site at Warton, with employment which compliments the Enterprise Zone?

Members agreed at the LPSG meeting on 5th June 2014 that there should be a mixed use / employment site at Warton, which compliments the Enterprise Zone. The Council will work with the Bryning with Warton Neighbourhood Plan Steering Group to identify a suitable site.

Comments in relation to the allocation of land in Kirkham and Wesham as a strategic location for development are dealt with in policy SL4 and the supporting text in chapter 7.

Comments in relation to windfall allowances and housing supply and delivery are dealt with in chapter 6 – The Spatial Development Framework.

The Council agrees to amend the table on page 205 in relation to site H13 - Land North of Mowbreck Lane, Wesham (housing), to provide the most up to date information on the site: “Residential development on part of the site has been approved on appeal.”

Recommendations for change
<ul style="list-style-type: none"> Amend the table on page 205 of the Preferred Options in relation to site H13 - Land North of Mowbreck Lane, Wesham (housing), to read: "<u>Residential development on part of the site has been approved on appeal.</u>"
Appendix 3: Housing Trajectory

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

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- Campaign to Protect Rural England (CPRE) - Fylde District
- 2 residents

What you said

Treales, Roseacre and Wharles Parish Council referred to their comments made on sites and phasing in earlier text.

Build-out rates

CPRE Fylde District commented that the build-out rates appear to be taken from the SHLAA, which was established from advice of house builders in 2009 during the market downturn. CPRE – Fylde District suggested build-out rates evidence should be provided and this should reflect anticipated market conditions over the whole Plan Period.

The inability to complete on Queensway and Whyndyke Farm by 2030 was questioned. The applicant and Inspector at appeal inquiry for Queensway placed priority on delivery. The Planning consultant for Whyndyke Farm stated 1,500 homes can be delivered by 2030. The Local Plan is potentially over estimating the number of sites needed. Where a housing scheme has been defined by a consultant or developer their own homes delivery evidence should supersede Planning Policy Team estimates.

A resident referred to errors in the trajectory. The spreadsheet clearly says H9 location twice, the latter should be site H8 which states that 220 houses will be built between 2024 and 2027. However the graph beneath the spreadsheet shows 0 houses to be built in Warton in this timeframe. Obviously these are little details but it sheds doubt on other details in the document.

A resident in relation to this section of the document, objected to the inclusion of land in Kirkham, and specifically referencing site H7 (Dowbridge). Issues raised included loss of best and most versatile agricultural land, flood risk, wildlife and landscape impact, historical remains, inadequate infrastructure and increased road traffic, loss of property values and rising insurance premiums, loss of privacy, nuisance of building works, noise and light pollution, extra refuse and risk of trespass.

Council response

Comments in relation to build-out rates are dealt with in chapter 7.

Comments in relation to Queensway and Whyndyke Farm are dealt with in chapter 7.

Comments in relation to the allocation of land in Kirkham and Wesham as a strategic location for development are dealt with under policy SL4 and the supporting text in chapter 7.

An updated housing trajectory will be produced for the next version of the Local Plan (Part 1), this will resolve the omission identified in the trajectory for site H8: Land west of Warton and site H9: Land north of Warton.

Recommendations for change

- Prepare updated housing trajectory, including rectifying identified omission(s).

Appendix 4: Parking Standards

No representations were received on appendix 4: Parking Standards.

Appendix 5: Performance Monitoring Framework

Number of representations:			
Comment	Support	Object	Total
2	0	1	3

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- 1 Resident
- 1 Residential developer

What you said

Treales, Roseacre and Wharles Parish Council asked why there are no targets for Performance Monitoring Framework Indicators 6-13.

A residential developer commented that the plan provides no policy to ensure that housing requirements are consistently met throughout the plan period. They recommended that a policy to monitor the supply of housing land should be implemented to ensure a five year land supply of housing is maintained.

A resident commented on the need for monitoring:

- Measure success / failure of 'making the best use of previously developed land...to reduce the loss of greenfield land';
- Measure the objectives of 'ensuring infrastructure is available to enable new development whilst protecting and enhancing the natural and built environment';
- Measure success / failure of protecting the best and most versatile agricultural land and increasing UK food security';
- Measure 'minimise risk of flooding (tidal and fluvial -what about surface run-off) - to existing and new development and improving bathing quality';
- Why, when you set yourself the objective of 'enhancing and restoring...biodiversity' and 'expanding biodiversity resources and improving habitat connectivity' do you set yourself the much lower target of 'no net loss'
- A target to measure the health and vibrancy of the retail sector.

The resident went on to comment that there is not a logical and complete connection between Vision, Objectives, Policies and Monitoring.

Council response

The Council will review and update the Performance Monitoring Framework as it works towards the next version of the Local Plan (Part 1).

The Council agrees to add a reference in policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space and to add a new key indicator to monitor retail floor-space in Appendix 5: Performance Monitoring Framework.

The Council will improve the connection between vision, objectives, policies and monitoring in the Local Plan (Part 1).

Recommendations for change

- Review and update the Performance Monitoring Framework.
- Add a new key indicator in Appendix 5 to monitor retail floor-space.
- Add a reference in Policy EC4 of the Preferred Options document to a 750 square metre threshold on retail floor-space.
- Improve connections between vision, objectives, policies and monitoring in the next version of the Local Plan (Part 1)

Map of Strategic Sites and sites assessed and not included

Map of Strategic Sites General Comments

Number of representations:

Comment	Support	Object	Total
2	0	0	2

Representations received from:

- Bryning with Warton Parish Council
- Treales, Roseacre and Wharles Parish Council

What you said

Bryning with Warton Parish Council said the strategic sites map does not acknowledge the proposed Enterprise Zone as an employment site.

Treales, Roseacre and Wharles Parish Council referred to their earlier comments on the sites in the document.

Council response

The Council will identify the boundary of the Enterprise Zone at BAE Systems Warton, together with the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and the proposed new employment allocations identified in policy EC1 of the Preferred Options document onto the Policies Map, which will be prepared to accompany the Publication version of the Local Plan. In addition to this, a new policy on the Enterprise Zone will be added to chapter 9 of the Local Plan (Part 1).

Recommendations for change

- Identify the boundary of the Lancashire Enterprise Zone at BAE Systems, Warton, on the Policies Map, which will be prepared to accompany the Publication version of the Local Plan.
- Identify the existing employment allocations that are carried forward from the adopted Fylde Borough Local Plan and the proposed new employment allocations in policy EC1 of the Preferred Options document onto the new Policies Map, which will accompany the Publication version of the Local Plan.

Map of sites assessed and not included

Number of representations:

Comment	Support	Object	Total
2	0	3	5

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- The Minority Group Report
- 2 residents
- 1 residential developer

What you said

Treales, Roseacre and Wharles Parish Council referred to their earlier comments on the sites in the document.

The Minority Group Report objected to the inclusion of “sites assessed but not included” as they give an indication that development might be acceptable in these areas. The Minority Group Report believed that brownfield or surplus employment land should be used for development, they considered there was enough of this type of land.

Council response

The Council has to provide a clear audit trail, including the justification, to demonstrate sites which have been assessed but not included. The “sites assessed but not included” are dealt with in Appendix 2 and on the accompanying map on page 233 of the Preferred Options document.

The Council is to carry out site assessments and prepare a background paper which will comprise a portfolio of sites, identifying sites to be taken forward in the next version of the Local Plan, and those that are to be dismissed.

Recommendations for change

- The Council is to prepare a background paper incorporating site assessments, identifying sites to be taken forward and those that are to be dismissed.

The Developing Infrastructure Delivery Plan for Fylde (Draft)

Developing Infrastructure Delivery Plan General Comments:

Number of representations:			
Comment	Support	Object	Total
7	0	3	10

Representations received from:

- BAE Systems Real Estate Solutions
- Electricity North West Ltd
- Lancashire County Council
- Kirkham Grammar School
- Residents of Mythop Road
- 1 resident

What you said

English Heritage supported the investment in parks and gardens as set out on page 54 of the Developing Infrastructure Delivery Plan for Fylde (Draft), as some of these are historic. However, they said that the contribution that the public realm makes to the historic environment should be recognised in the Infrastructure Delivery Plan. They also advised that the Council's conservation staff should be involved throughout the preparation and implementation of the Infrastructure Delivery Plan.

Electricity North West (ENW) said, based on certain assumptions, that the electricity infrastructure in the vicinity of the proposed developments in the Preferred Options document has sufficient capacity without the need to upgrade or reinforce the local electricity network. ENW added that the electricity network will need refining, but detailed information will be required in order to determine what refinements will be required:

- Number and type / size of dwellings (large / small detached, terraced etc);
- Heating requirements of the dwellings (gas / electric / other);
- Domestic generation capability (Solar PV cells etc); and
- Employment land usage (offices, leisure, industrial / process).

Residents of Mythop Road made reference to capacity of the combined sewer system and the need to deal with surface water, as set out in the Infrastructure Delivery Plan.

The Home Builders Federation claimed that although the current version of the Infrastructure Delivery Plan identifies a wide range of infrastructure schemes, they said no funding sources are identified for much of these schemes. They added that the Council must identify the likely development costs and funding mechanisms prior to the next stage of the Plan.

The Home Builders Federation said that as it is likely that the Council will not be able to find funding for all of the listed projects, the Infrastructure Delivery Plan will need to prioritise infrastructure based upon its deliverability and ability to positively contribute towards economic growth. The Home Builders Federation added that the Council may need to reconsider its infrastructure priorities once it has undertaken the Viability Assessment of the Local Plan.

A resident claimed that barely a mention is made of shale gas exploration and extraction (i.e. 'fracking'), and that no mention is made of the effect that it will have on Fylde's future. The resident said that the Infrastructure Delivery Plan should include expectations for provision for increased water supply; infrastructure upgrades to accommodate the vehicles that will remove wastewater; effects on sales of current and future housing; and the effect on tourism and leisure. The resident stated that if proposed housing is mentioned in the Infrastructure Delivery Plan, then why isn't shale gas exploration and extraction ('fracking')? It was also mentioned that the Elswick well produces methane gas, not shale gas as stated in the Infrastructure Delivery Plan.

Kirkham Grammar School made reference to paragraph 3.75, but said that the wastewater issues at the Kirkham Triangle appear to have been addressed to the satisfaction of United Utilities. They therefore claimed that it can be assumed that this issue can be addressed in the short term for this site. Kirkham Grammar School also claimed that paragraphs 6.5 and 6.6 refer to superceded yield figures for school provision, and that the updated figures should be used in the next version of the Local Plan and in the Infrastructure Delivery Plan. Lancashire County Council made reference to the latest "Planning Obligations in Lancashire" methodology, which provides the current yield and cost per school place.

BAE Systems Real Estate Solutions supported the proposed Preston Western Distributor Road and its inclusion within the Infrastructure Delivery Plan. They said that the Central Lancashire Highways and Transport Masterplan shows the indicative location of the road, and that this should therefore be shown in the Infrastructure Delivery Plan. They also claimed that it is understood that the principle justification for the road is the North West Preston Strategic Housing Area (i.e at Higher Bartle), but that the road will to some extent assist access to the Warton Enterprise Zone and Aerodrome.

BAE Systems Real Estate Solutions also supported the proposal to examine the requirement for a bypass around Warton as part of its location for strategic development. They added that alongside this appraisal should be an examination of improving links from the strategic development sites to the proposed District / Village Centre and the Enterprise Zone at Warton.

BAE Systems Real Estate Solutions also suggested that bus services from the strategic development sites to the proposed District / Village Centre and the Enterprise Zone will need to be provided to ensure accessible and sustainable communities. They also supported the statement in paragraph 2.27 in relation to the former GEC Marconi Plastics Factory site. They agree that a rail connection to Warton, within the Local Plan period, would be highly aspirational. They supported the extension of the cycle path along the A584 between Preston and Warton and were keen to work with Lancashire County Council and Fylde Council on its delivery. They also stated that they wish to work with the County Council and Fylde Council on any proposed coastal cycle route that runs adjacent to the southern part of the Aerodrome.

In relation to the former GEC Marconi Plastics Factory site, BAE Systems Real Estate Solutions suggested that wastewater and drainage was considered adequate. They also said that they would support the improvement of coastal defences. BAE Systems Real Estate Solutions also supported the provision of a secondary school within Warton. However, they claimed that it is not clear whether a primary school will be required within the settlement. They also supported the proposal for a coastal path between Starr Gate and Freckleton Marshes. BAE Systems Real Estate Solutions would wish to ensure that any proposals are aligned with the operational requirements of the Warton Aerodrome.

BAE Systems Real Estate Solutions finally suggested that it would be useful if an appendix was included that detailed the infrastructure requirements within each settlement.

The Highways Agency said they are keen to be involved in further discussions in the development of a suitable evidence base in conjunction with the Fylde Coast Highways and Transport Masterplan. They said that the 'Blue Route' should not be seen as a solution to congestion on the A585 as there are concerns over the viability of this route. However, they supported the M55-Heyhouses link; and the funding of the Preston Western Distributor road.

United Utilities provided an amended version of Water Supply; and Wastewater and Drainage chapters for insertion into the draft Infrastructure Delivery Plan.

Council response

The Council is liaising with a range of infrastructure and service providers to identify the infrastructure upgrades / provision that will be required over the Plan period.

The Council agrees with English Heritage to add a reference in the draft Infrastructure Delivery Plan to the public realm and the contribution it makes to the historic environment. The Council will continue to involve conservation staff in the preparation of the Infrastructure Delivery Plan, together with the Local Plan.

The Council acknowledges the comments made by Electricity North West, and will incorporate this information into the draft Infrastructure Delivery Plan.

The Council will amend the draft Infrastructure Delivery Plan, inserting the replacement text proposed by United Utilities on water supply, wastewater and drainage.

The Council is aware that there are schemes in the draft Infrastructure Delivery Plan where funding sources have not been identified. Infrastructure and service providers will continue to be engaged in the process so that such funding sources can be identified as far as possible. The Council will not presently be required to reconsider its infrastructure priorities as a result of the Viability Study, as such priorities have not yet been set. Infrastructure priorities will be identified as the draft Infrastructure Delivery Plan and Community Infrastructure Levy develop.

The NPPF requires local planning authorities to significantly boost the supply of housing.

The Council has no delegated powers to stop or regulate shale gas exploration and extraction ('fracking'). It is the responsibility of Lancashire County Council, as the Minerals Planning Authority, to grant with conditions or to refuse planning permission for shale gas exploration and extraction. The County Council is currently preparing a supplementary planning document on shale gas exploration and extraction, which will be referred to in chapter 1 of the next version of the Local Plan (Part 1).

In accordance with comments from Kirkham Grammar School and BAE Systems Real Estate Solutions, the Council will update the draft Infrastructure Delivery Plan to take account of recent planning permissions in terms of addressing infrastructure issues. In accordance with Kirkham Grammar School and Lancashire County Council's comments, the Council will take account of the latest "Planning Obligations in Lancashire" methodology when calculating the current yield and cost per school place.

BAE Systems Real Estate Solutions claimed that it is understood that the principal justification for the Western Preston Distributor Road is the Strategic Housing Area at Higher Bartle, but that the road will assist access to the Lancashire Enterprise Zone at BAE

Systems, Warton, including the Aerodrome. However, the Council considers that the text in paragraph 2.6 should be re-ordered so that the benefits of the Preston Western Distributor Road to the Fylde Coast are mentioned, before making reference to access to the new housing that has been masterplanned in North West Preston. The County Council consulted on the preferred route of the Preston Western Distributor Road, the East-West Link Road and Cottam Link Road from 30th May to 13th July 2014.

The Council will continue to liaise with Lancashire County Council in relation to the potential development of a bypass around Warton and links towards a potential village centre at Warton and the Enterprise Zone, in addition to the upgrading of bus services.

The Council will seek to involve BAE Systems Real Estate Solutions in potential upgrades to the cycle network at Warton that would facilitate access to the Aerodrome and Enterprise Zone.

In terms of primary school places, the Council will continue to liaise with Lancashire County Council so that the anticipated number of primary school places generated by the development proposed in the Local Plan is identified, and as far as possible how such places could be delivered during the Plan period.

The Council will continue to work with the Highways Agency so that the impacts to the strategic road network are clearly understood, and major upgrades that would be required are set out in the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will also align with the schemes identified in the Fylde Coast Highways and Transport Masterplan, including the status of the “Blue Route.”

The Council considers that all of the infrastructure requirements for the Borough are set out in Appendix 2, comprising the Infrastructure Schedule and that there is no need to provide an additional appendix, detailing the infrastructure requirements for each settlement. Ongoing dialogue is taking place between the Council and staff at Lancashire County Council regarding the transport and social infrastructure requirements of settlements in Fylde, the results of which will be included in the Infrastructure Delivery Plan.

Recommendations for change

- Insert the replacement text on water supply, wastewater and drainage as recommended by United Utilities.
- Add a new paragraph 3.11A of the Preferred Options: “Electricity North West (ENW) has confirmed, based on certain assumptions, that the electricity infrastructure in the vicinity of the strategic sites in the Preferred Options has sufficient capacity without the need to upgrade or reinforce the local electricity network. The electricity network will need refining, but detailed information will be required in order to determine what refinements will be required: i.e. the number and type / size of dwellings (large / small detached, terraced etc); heating requirements of the dwellings (gas / electric / other); domestic generation capability (Solar PV cells etc); and employment land usage (offices, leisure, industrial / process)”.
- Amend the heading before paragraph 3.72 of the Preferred Options which refers to “Blackpool Periphery Strategic Location” to read “Fylde-Blackpool Periphery Strategic Location”.
- Ensure that the Infrastructure Delivery Plan refers to all of the highway and public transport schemes and initiatives that are proposed for implementation in the Fylde Coast Highways and Transport Masterplan.

- Amend paragraph 2.6 of the Preferred Options to read: “The Preston Western Distributor Road is a proposed new road linking the M55 near Bartle with the A583 east of Clifton. The construction of the Preston Western Distributor will improve road access to the Enterprise Zone at Warton, the wider Fylde Coast, and serve new housing in north-west Preston. This will also include the delivery of a new junction (junction 2) on the M55 west of Broughton, as identified in the Central Lancashire Highways and Transport Masterplan. The developing Infrastructure Delivery Plan does not currently show a map of the route, as the route is highly indicative at present. Map 3 shows the preferred routes for the Preston Western Distributor Road, the East-West Link Road and the Cottam Link Road ”
- Clarify the need for, if any and the possible location of, a new secondary school in Fylde.
- Amend the Infrastructure Delivery Plan to refer to potential upgrades to the cycle network across the Fylde and specifically at Warton that would facilitate access to the Aerodrome and Enterprise Zone.
- Update the Infrastructure Delivery Plan, incorporating a list of infrastructure requirements for each of the strategic locations for development, and issue it for consultation alongside the Local Plan.
- Add the following reference to the public realm in the Infrastructure Delivery Plan: “The public realm generally includes the spaces and the buildings surrounding them but in this context, is generally taken to be the publicly accessible parts of the environment, physically and / or visually. In the case of conservation areas, the design, management and maintenance of the public realm is an important element of its character and a particularly important indicator of the quality of place. In designing the public realm, the most appropriate materials and street furniture will be used consistent with available resources. It will then be appropriate to put in place a ‘public realm code’. Essentially, this will provide a manual that will identify a specification for the various elements of the public realm including street furniture, landscaping, and materials and an inventory with agreed maintenance schedules put in place. This practice would represent a good means of auditing the quality of the public realm and agreed actions from the various partners involved would highlight what is required to maintain it to an appropriate standard. This initiative will involve working alongside the highway authority, Lancashire County Council”.
- Add a new paragraph after 10.11 of the Preferred Options saying: “Joint working has already started on the planning, delivery and maintenance of a coastal path between Starr Gate and Freckleton Marshes, between Fylde Council and Lancashire County Council”.

Sustainability Appraisal

Sustainability Appraisal General Comments:

Number of representations:			
Comment	Support	Object	Total
3	0	4	7 ³¹

Representations received from:

- English Heritage
- Natural England
- 1 Resident
- 1 Action group

What you said

Heritage

English Heritage commented that the Local Plan lacks any proper description or assessment of the historic environment, lacks a robust policy for the management of the historic environment and the supporting evidence base is deficient in relation to heritage information. Therefore, English Heritage considered that the effects on the historic environment is uncertain as it is not possible to determine the Plan's impact on the Borough's historic environment. English Heritage advised that the Council's conservation staff should work closely on the preparation of the Sustainability Appraisal of the plan.

Baseline Indicators

Overall, Natural England supported the baseline natural environment indicators and welcomed the matrix of compatibility of the Sustainability Objectives.

Natural England suggested further work is required on the strategic sites put forward as the Sustainability Appraisal shows negative impacts in terms of biodiversity and geodiversity.

Natural England welcomed objective 10 but suggested there should be mention of soils. They recommended the inclusion of a specific objective for soils within the environmental sustainability objectives.

Natural England suggested that some of the social and economic objectives could be improved by further emphasising the importance of Green Infrastructure and its multifunctional benefits, which would assist in the delivery of a range of Sustainability Appraisal topic areas. This would assist in ensuring that Green Infrastructure is an integral, cross-cutting theme.

Natural England welcomed recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space,

³¹ Some respondents have submitted more than one representation for this section, therefore the number of representations do not match the number of respondents.

water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils. Natural England suggested the scope of the Sustainability Appraisal should be relevant to the issues addressed in the Local Plan which itself should reflect the requirements of the NPPF.

Natural England suggested protected species could specifically be included in the Sustainability Appraisal and Natural England has produced standing advice. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England.

Monitoring framework

Natural England suggested the monitoring framework includes some helpful indicators which are welcomed. They suggested further monitoring indicators in relation to:

- Biodiversity / geodiversity / landscape.
- Green infrastructure / recreation / access
- Landscape character and quality

Natural England welcomed the inclusion of access standards and suggested the use of ANGSt benchmarks and other national standards such as Green Flag and County Park accreditation schemes. They welcomed reference to landscape character and suggested the use of National Character Areas.

Plans, Programmes and Environmental Protection Objectives

Natural England welcomed the list of policies, plans and programmes and suggested it appears to cover all relevant documents. They suggested the list should be updated during the next stage of the Sustainability Appraisal process to ensure emerging policies, plans and programmes are added to the baseline.

Fylde-Blackpool Periphery

In relation to Whyndyke Farm, an action group commented that they disagree with the comments describing the landscape as poor quality. The loss of this land to mixed use development would be visually over-bearing and could encourage creeping development.

Warton

A resident commented on the findings of the Sustainability Appraisal / Strategic Environmental Assessment in relation to Warton:

- “Congestion in the area will not improve” – they suggested the Local Plan should commit to road improvements, including a bypass. Further housing will increase highways congestion.
- “Warton also benefits from a range of employment opportunities” – Warton only has two main employers and BAE Systems are in decline. The resident also suggested the Sustainability Appraisal quote contradicts reference in the Sustainability Appraisal that development will not promote economic inclusion, opportunities or business development.
- “There is a lack of community facilities in Warton” – Development would create further pressure on Warton’s limited facilities and the Local Plan does not guarantee the provision of further facilities.

Council response

Heritage

Comments in relation to heritage are dealt with in chapter 14 of the Local Plan (Part 1).

Baseline Indicators

The comments of Natural England are noted.

The Council will undertake further work on the strategic sites as it produces the next version of the Local Plan, this will take on board the findings of the Sustainability Appraisal and address any potential negative impacts.

The Sustainability Appraisal objectives were rationalised following the previous sustainability appraisal scoping consultation. Soil is currently included within objective 16 “Ensuring the sustainable use of natural resources”. The Council will liaise with the consultants who undertake the Sustainability Appraisal to consider whether objective 10 should also refer to soils.

Further cross cutting references to Green Infrastructure within the social and economic objectives and inclusion of protected species in the Sustainability Appraisal will be considered.

Monitoring Framework

The Council will liaise with the Sustainability Appraisal Consultants to consider the further monitoring indicators suggested by Natural England.

Plans, Programmes and Environmental Protection Objectives

The Plans, Programmes and Environmental Protection Objectives will be reviewed and updated as part of a future stage in the Sustainability Appraisal process, this will include adding relevant information to the baseline.

Fylde-Blackpool Periphery

The Council are proposing to undertake landscape assessment work at the Strategic Locations for Development. This work will feed into the future Sustainability Appraisal process. The reference to visually poor quality uses on land at the edge of Blackpool refers to the previously developed land for a range of visually poor quality uses, including horticulture, caravan storage, scrap yards, kennels and the former Pontins Holiday Camp amongst others. Redevelopment following strict design guidelines could benefit the character of the area.

Warton

Comments in relation to highways infrastructure, employment opportunities and community facilities in Warton are dealt with under policy SL3 in chapter 7.

Recommendations for change

- Update Plans, Programmes and Environmental Protection Objectives and add relevant information to the baseline.

Habitats Regulations Assessment – Screening Report

Habitats Regulations Assessment General Comments

Number of representations:

Comment	Support	Object	Total
2	0	1	3

Representations received from:

- Natural England
- Lancashire Wildlife Trust
- 1 Action Group

What you said

Natural England

Overall, Natural England were satisfied with the approach taken in relation to the Habitats Regulations Assessment. They suggested there are some outstanding concerns within the Habitats Regulations Assessment conclusions which must be resolved before the Plan progresses to ensure no uncertainty remains at the submission stage.

Natural England sought further detail on the measures that will be taken to avoid potential impacts as result of the Strategic Locations for Development. They suggested that more evidence and explanation to support the view that the additional policy wording / strengthening outlined are robust enough to ensure that the preferred options are 'unlikely to have any significant effects on the European Sites identified, either alone or in combination with any other plans and projects'.

Natural England suggested that this information is provided and once more detail is known, it is likely that changes will occur between the current draft (Preferred Option) and the next stage, therefore the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site.

Lancashire Wildlife Trust

Lancashire Wildlife Trust commented in relation to the Habitats Regulations Assessment conclusion and said it was unclear whether the Assessment's recommendation to re-word the policy had already been factored into the Local Plan to address concerns of the strategic sites and specifically H5.

In-combination effects

An action group objected to the failure of the Habitats Regulations Assessment screening report to identify Lytham Moss as functionally linked to Ribble and Alt Estuary. The action group suggested the 'in-combination effects' of the Local Plan, shale gas exploration on the Moss, drainage issues and the current Queensway scheme should be considered.

Council response

Natural England

The comments of Natural England are noted.

The Preferred Options Habitats Regulations Assessment screening and Natural England's comments will assist the Council in producing the next version of the Local Plan, which will then be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. The Council will consult Natural England on any revised Habitats Regulations Assessment Screening.

Lancashire Wildlife Trust

The Habitats Regulations Assessment screening was undertaken on the Local Plan Preferred Options document. The Preferred Options document published for consultation does not factor in the findings of the independent Habitats Regulations Assessment Screening. The Habitats Regulations Assessment Screening will be factored into the next version of the Local Plan.

The planning status of the proposed strategic sites in the Preferred Options document was taken at a base date of November 2012 with the Preferred Option document published for consultation in June 2013. At the November 2012 base date, a planning application had been submitted for site H5. In May 2013 site H5 received outline planning permission. As part of this process, Natural England were consulted and did not raise any objections to the scheme. It was unfortunate that this update in planning status of site H5 could not be reflected in the Preferred Options document and thus reflected in the Habitats Regulations Assessment Screening. This information will be reflected in the next version of the Local Plan, which will then be subject to Habitats Regulations Assessment screening, following which Natural England will be consulted on the site.

In-combination effects

Table 5-2 of the Habitats Regulations Assessment screening report provides a detailed assessment of the Strategic Sites in relation to European sites within and outside of Fylde. In regards to the Strategic sites, the Habitats Regulations Assessment screening report suggests "..... *The significance of impacts of development at these strategic locations is likely to be greater the closer the proposed development is to the European Site..... development in these strategic locations (in particular, policy SL2, which includes an allocation of 20ha for mixed use development at Whyndyke Farm) does have the potential to adversely affect land which may be functionally linked to European Sites (e.g. agricultural land used by foraging pink-footed geese, a feature of Morecambe Bay Special Protection Area, Ribble and Alt Estuaries Special Protection Area and Martin Mere Special Protection Area).*"

The comments in relation to the 'in-combination effects' of shale gas exploration and extraction in relation to the Local Plan, drainage and Queensway will be considered for inclusion as part of the Habitats Regulations Assessment re-screening process.

Recommendations for change

- Re-screen the Local Plan (Part 1) at the next stage.

Rural Proofing Assessment

Rural Proofing Assessment General Comments

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- English Heritage

What you said

English Heritage stated that they have no comments to make on the Rural Proofing Assessment.

Council response

The Council acknowledges that English Heritage have no comments to make on the Assessment.

Recommendations for change

- None

Rapid Health Impact Assessment

Rapid Health Impact Assessment General Comments:

Comments on the Rapid Health Impact Assessment are included in chapter 11.

Local Plan and Community Infrastructure Levy - Viability Study

In preparing this evidence document the Council has sought to engage with practitioners involved in the development industry. This report was prepared following a consultation process with landowners, agents and developers. Two events have been held and input into modelling provided by stakeholders.

20th June 2013:

Number of Attendees:			
Comment	Support	Object	Total
19	0	0	19

Attendees included:

- Environment Agency
- Blackpool Council
- Wyre Council
- Lancashire County Council
- 10 residential developers
- 4 Landowners

Presentation and discussion with promoters of the key development sites within the District and the representatives of the main developers, development site landowners and housing providers. The meeting was used to introduce the development industry to the NPPF and the Community Infrastructure Levy, to set out the methodology, test the assumptions used in the report and to put the report in context. The event was divided into three parts:

- i. An introduction to viability testing in the context of the Community Infrastructure Levy regulation 14 and paragraph 173 of the NPPF.
- ii. Viability Assumptions. The methodology and main assumptions for the viability assessments were set out including development values, development costs, land prices, developers and landowners returns.
- iii. Discussion. A wide ranging and informative discussion took place. There was not agreement on all points although there was a broad consensus on most matters. The feedback was carefully recorded.

Following the consultation event on the 20th June, the main assumptions were circulated to the consultees and written representations invited in the context of the Harman Guidance. Where specific representations were made the consultants have re-considered the assumptions made.

1st August 2013:

Pro formas setting out the main development assumptions were sent to landowners, developers, agents and promoters of strategic sites. Their comments were received to ensure that the modelling was as representative as possible.

9th September 2013:

Number of Attendees:			
Comment	Support	Object	Total
21	0	0	21

Attendees included:

- Environment Agency
- Highways Agency
- Lancashire County Council
- 10 residential developers
- 4 Landowners
- 1 Registered Social Landlord

A second meeting including a presentation and discussion was held with promoters of the key development sites within the Borough and the representatives of the main developers, development site landowners and housing providers. The meeting was used to set out the changes that had been made to the assumptions in light of the comments received at and following the first meeting. The main points made were as follows:

- Two separate comments about the need to provide incentives to house purchasers in order to realise sales and that these costs required inclusion in the development cost / values.
- Developer's profit to reflect competitive return adopted profit margin should be 20% of Gross Development Value on all sites.
- Density – reference was made to the emerging large scale proposal on greenfield land at North West Preston. Volume house builders promoting development here are commenting that they are currently building at 25/ha in other greenfield locations in Central Lancashire. It was noted that this would vary considerably depending on the amount of open space provided.
- The average unit is too small for some of the modelled sites e.g. 70 sq m which was not reflective of market demand.
- Request made to include a larger site within the modelled sites to provide greater balance.
- Should include comparables for Taylor Wimpey's Meadow View scheme in Warton (60 units for family housing) – these details were requested (but not subsequently provided)
- Comment was made as to the alternative value for sites being promoted for residential development (£300,000 was considered too low) and the level of uplift to incentivise land release

Consultee comments made after the event are recorded below and are summarised in order to retain anonymity:

- That a nil Community Infrastructure Levy rate be set for employment development in the Enterprise Zone at BAE Systems, Warton – although no viability evidence was provided to support such a charging zone.
- The appraisals adopt densities which have a higher proportion of 2 and 3 bed units. Given the strategic objective to deliver lower density housing, we would suggest that the mix of types should, instead, be weighted more towards larger 4 and 5 bedroom properties.
- As a standard rule of thumb, every net developable acre should be able to deliver in the region of 12,000 - 15,000 square feet or 3,000 - 3,400 square metres per hectare.
- Market housing prices in the consultation document are based on overly "optimistic" asking prices from developers who are heavily discounting and incentivising in the background and in some cases are seeing stagnant sales rates. No alternative prices were provided or put forward by the industry or consultees.
- It was suggested that sales values inducements of up to 10% of gross asking prices need to be reflected in the residential values.

- It was suggested that an overly simplistic approach has been taken in respect of values for affordable housing – although no alternative was suggested.
- Residential value of £1,000,000/ha was considered too low although no alternative evidence was provided, in spite have having been requested.
- Infrastructure costs should be at least 15% and up to 20% of base construction costs.
- Evidence of actual residential land values should be used to inform alternative use values and % uplift.
- Interest charges should also include arrangement (1% of loan value), management (at £1,000 per month) and exit fees (1% of loan value).
- Disposal cost of 3% is too low. A minimum of 4% should be used to reflect marketing and legal fees.

Council response

Based on the good turnout and level of engagement, the Council are confident that the consultation process captured the views of the key stakeholders operating in the area. The comments of the consultees are reflected throughout the report and the assumptions have been adjusted where appropriate. Where there was disagreement, the consultants have made a judgement and set out why the consultants have made the assumptions used. In this report the consultants have not attributed these comments to the consultees as they undertook to present all representations on an anonymous basis, with a view to a more open and frank engagement and to protect commercially sensitive matters. The Council will consider the findings of the two consultation events with landowners, agents and developers into the Community Infrastructure Levy Viability Study.

Appendix A - LIST OF CONSULTEES WHO MADE REPRESENTATIONS ON THE FYLDE LOCAL PLAN PREFERRED OPTIONS – PART 1

LIST OF CONSULTEES WHO MADE REPRESENTATIONS ON THE FYLDE LOCAL PLAN PREFERRED OPTIONS – PART 1	
CONSULTEE NO.	CONSULTEE NAME
Business Support – 2	
GCB/BS/08/00325	Home Builders Federation
GCB/BS/08/00333	Federation of Small Businesses
Ethnic Racial and National Groups - 1	
GCB/ERN/13/01639	The Traveller Movement
Local Businesses – 1	
GCB/LB/13/01498	BAE Systems Real Estate Solutions
Voluntary Bodies -2	
GCB/VB/08/00494	Lytham St. Annes Civic Society
GCB/VB/08/00500	The Theatres Trust
Action Groups – 4	
OC/ACT/13/01771	Fylde Groups
OC/ACT/13/01764	Residents of Mythop Road
OC/ACT/13/2036	The Minority Group Report
OC/ACT/11/01341	Wesham Action Group
Agents and Consultants - 14	
OC/AGCN/13/01571	AXA Insurance
OC/AGCN/13/01760	Closelink Ltd C/O Cassidy and Ashton Group Ltd
OC/AGCN/13/01759	Commercial Estates Group C/O Pegasus Group
OC/AGCN/13/01729	Daniel Barton, Storey Homes C/O Barton Willmore
OC/AGCN/12/00996	G L Hearn
OC/AGCN/13/01758	Hallam Land Management C/O Pegasus Group
OC/AGCN/13/01680	Mr and Mrs J and Ms S Rawcliffe C/O Steven Abbott Associates
OC/AGCN/13/02020	Oystons Estates Ltd, Blackpool Football Club C/O Alban Cassidy
OC/AGCN/13/01516	Paul Walton, Mill Farm Ventures C/O PWA Planning
OC/AGCN/13/01730	Sainsbury's Supermarket Ltd C/O Turley Associates
OC/AGCN/13/01698	Shepherd
OC/AGCN/13/01640	Steven Abbott Associates
OC/AGCN/13/01746	Steven Abbott Associates - Agent
OC/AGCN/08/00210	The Emmerson Group
Councillors - 8	
OC/CLLR/11/00121	Sue Ashton
OC/CLLR/11/00132	Brickles
OC/CLLR/11/00091	Clayton
OC/CLLR/09/00921	Eastham
OC/CLLR/09/00926	Ford
OC/CLLR/09/00930	Hardy
OC/CLLR/09/00939	Nulty
OC/CLLR/09/00952	Speak

Environmental Groups -1	
OC/ENV/09/00902	Queensway Environmental Defenders
Local Farmers - 3	
OC/FARM/11/01270	Bartlett
OC/FARM/11/01297	Laycock
OC/FARM/11/01260	Pickervance
Gypsy Travellers Wyre Fylde Forum – 1	
OC/GYPS/11/01179	Heine
Interested Bodies – 601	
OC/IB/13/01718	Adams
OC/IB/13/01722	Adkins-Farmer
OC/IB/13/01614	Adkinson
OC/IB/13/01952	Adkinson
OC/IB/13/01953	Adkinson
OC/IB/13/01954	Adkinson
OC/IB/08/00581	Ainscow
OC/IB/13/01670	Ainsworth
OC/IB/13/01575	Alker
OC/IB/13/01879	Allen
OC/IB/13/01532	Allman
OC/IB/13/01533	Allman
OC/IB/13/01725	Allman
OC/IB/13/01414	Amphlett
OC/IB/13/01472	Amphlett
OC/IB/13/01473	Amphlett
OC/IB/13/01474	Amphlett
OC/IB/13/01935	Andrews
OC/IB/13/01936	Andrews
OC/IB/13/01556	Angus
OC/IB/13/01585	Appleton
OC/IB/13/01595	Appleton
OC/IB/13/01949	Armitage
OC/IB/13/01949	Armitage
OC/IB/13/01950	Armitage
OC/IB/13/01875	Armour
OC/IB/13/01499	Armstrong
OC/IB/13/01829	Ashton
OC/IB/13/01830	Ashton
OC/IB/12/01229	Ashworth
OC/IB/13/01702	Ashworth
OC/IB/13/01703	Ashworth
OC/IB/13/01824	Askew
OC/IB/13/01929	Aspden
OC/IB/13/01461	Atkinson
OC/IB/13/01513	Awde
OC/IB/13/01515	Awde

Appendix 6: Preferred Option 2013: Consultation Responses

OC/IB/13/01966	Baker
OC/IB/13/01967	Baker
OC/IB/13/01663	Balchin
OC/IB/13/01786	Baldwin
OC/IB/13/01756	Ball
OC/IB/13/01558	Bamber
OC/IB/13/01968	Bamber
OC/IB/13/01969	Bamber
OC/IB/13/01485	Banks
OC/IB/13/01524	Barber
OC/IB/13/01525	Barber
OC/IB/13/01568	Barber
OC/IB/13/01789	Barks
OC/IB/13/01674	Barnes
OC/IB/13/01774	Barnes
OC/IB/13/01892	Barton
OC/IB/13/01765	Barton and Bennett
OC/IB/13/01570	Bates
OC/IB/13/01453	B-Edwards
OC/IB/13/01961	Bell
OC/IB/13/01992	Bellion
OC/IB/13/01651	Bendall
OC/IB/13/01652	Bendall
OC/IB/13/01494	Benett
OC/IB/13/01582	Bennett
OC/IB/13/01752	Bennett
OC/IB/13/01937	Bennett
OC/IB/13/01963	Bennett
OC/IB/13/01889	Bennett-Griffin
OC/IB/13/01624	Benson
OC/IB/13/01426	Bentham
OC/IB/13/01839	Beresford
OC/IB/13/01788	Berwick
OC/IB/13/01880	Bethell
OC/IB/13/01883	Bird
OC/IB/13/01460	Birkett
OC/IB/13/01740	Blackpool, Fylde and Wyre Trades Union Council
OC/IB/13/01715	Blacoe
OC/IB/13/01802	Blake
OC/IB/13/01672	Bleasdale
OC/IB/13/02017	Bleasdale
OC/IB/13/01643	Boddy
OC/IB/13/01604	Bolton
OC/IB/13/01605	Bolton
OC/IB/13/01622	Bonney
OC/IB/13/01876	Bottle

OC/IB/13/01420	Bottomley
OC/IB/13/01421	Bottomley
OC/IB/13/01655	Bottomley
OC/IB/13/01463	Bradley
OC/IB/13/01573	Brandwood
OC/IB/13/01574	Brandwood
OC/IB/13/01557	Bresnihan
OC/IB/13/01714	Bretherton
OC/IB/14/02034	Brockbel
OC/IB/13/01638	Brooks
OC/IB/13/01959	Brooks
OC/IB/13/01916	Brotherton
OC/IB/13/01398	Brown
OC/IB/13/01972	Bull
OC/IB/13/02014	Bunce
OC/IB/13/01775	Burke
OC/IB/13/01931	Butcher
OC/IB/08/00516	Butler
OC/IB/13/01503	Butler
OC/IB/13/01665	Butterfield
OC/IB/13/01514	Butterworth
OC/IB/13/01957	Butterworth-Edwards
OC/IB/13/01996	Callison
OC/IB/13/01882	Cameron and Burns
OC/IB/13/01469	Cardwell
OC/IB/13/01679	Carr
OC/IB/13/01705	Carrdus
OC/IB/13/01686	Carrick
OC/IB/13/01816	Carruthers
OC/IB/13/01487	Catlow
OC/IB/13/01784	Charnley
OC/IB/13/01790	Cherry
OC/IB/13/01620	Chetwood
OC/IB/13/01621	Chetwood
OC/IB/13/01610	Christopher
OC/IB/13/01777	Clark
OC/IB/13/01478	Clarke
OC/IB/13/01479	Clarke
OC/IB/13/01733	Clarke
OC/IB/13/01795	Clarke
OC/IB/13/01908	Clarke
OC/IB/13/01962	Clarke
OC/IB/13/01470	Clarkson
OC/IB/13/02003	Clegg
OC/IB/13/01448	Clinning
OC/IB/13/01578	Clinning

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OC/IB/13/01490	Clydesdale
OC/IB/13/01977	Cockburn
OC/IB/13/01978	Cockburn
OC/IB/13/01691	Cole
OC/IB/13/01939	Colville
OC/IB/13/02024	Connolly
OC/IB/13/01901	Cook
OC/IB/13/01600	Cooper
OC/IB/13/01938	Copeland
OC/IB/13/01550	Cottle
OC/IB/13/01553	Cottle
OC/IB/13/01480	Cousins
OC/IB/13/01828	Cox
OC/IB/13/01986	Cox
OC/IB/13/01987	Cox
OC/IB/13/01483	Cranston
OC/IB/13/01484	Cranston
OC/IB/13/02010	Cross
OC/IB/13/01906	Culverhouse
OC/IB/13/01706	Curran
OC/IB/13/01707	Curran
OC/IB/13/01547	Cutler
OC/IB/13/01719	Dagger
OC/IB/13/01512	Daldry
OC/IB/13/01862	Danson
OC/IB/13/00074	Davies
OC/IB/13/01723	Davies
OC/IB/13/01831	Davies
OC/IB/13/01832	Davies
OC/IB/13/01833	Davies
OC/IB/13/01476	Davison
OC/IB/13/01569	Dearing
OC/IB/13/01572	Dearing
OC/IB/13/01441	Denham
OC/IB/13/01549	Dewhurst
OC/IB/13/01630	Dewhurst
OC/IB/13/01551	Dickers
OC/IB/13/01552	Dickers
OC/IB/13/01656	Dixon
OC/IB/13/01841	Dixon
OC/IB/13/01408	Donnelly
OC/IB/13/01449	Donnelly
OC/IB/13/01815	Douglas
OC/IB/08/00610	Dovey
OC/IB/13/01579	Downes
OC/IB/13/01580	Downes

OC/IB/13/01878	Dugdale
OC/IB/13/01554	Duggan
OC/IB/13/01877	Dyson
OC/IB/13/01945	Earl
OC/IB/13/01933	Eaves
OC/IB/13/01934	Eaves
OC/IB/13/01980	Eccleston
OC/IB/13/01562	Edmondson
OC/IB/13/01563	Edmondson
OC/IB/13/01564	Edmondson
OC/IB/13/01438	Edwards
OC/IB/13/01633	Eilbeck
OC/IB/13/01634	Eilbeck
OC/IB/13/01951	Evans
OC/IB/13/01872	Everett
OC/IB/13/01528	Fallows
OC/IB/13/01530	Fallows
OC/IB/13/01531	Fallows
OC/IB/13/01437	Farnworth
OC/IB/13/01871	Fell
OC/IB/13/01535	Fenton
OC/IB/13/01536	Fenton
OC/IB/13/01692	Fidgen
OC/IB/13/01693	Fidgen
OC/IB/13/01770	Fielding
OC/IB/13/01462	Fletcher
OC/IB/13/01520	Fletcher
OC/IB/13/01521	Fletcher
OC/IB/13/01522	Fletcher
OC/IB/13/01981	Forgione
OC/IB/13/02004	Fowler
OC/IB/13/01749	Franks
OC/IB/13/01544	Fraser
OC/IB/13/01545	Fraser
OC/IB/13/01814	Fraser
OC/IB/13/01982	Fraser
OC/IB/13/01983	Fraser
OC/IB/13/01400	Frost
OC/IB/13/01769	Frost
OC/IB/13/01779	Fullalove
OC/IB/13/01726	Fuller
OC/IB/11/01355	Galbraith
OC/IB/13/01924	Gandy
OC/IB/13/01866	Gardner
OC/IB/13/01785	Garner
OC/IB/13/01591	Gibson

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OC/IB/13/01592	Gibson
OC/IB/08/00535	Gilbert
OC/IB/13/01890	Giltrow
OC/IB/13/01922	Godfrey
OC/IB/13/01782	Goodenough
OC/IB/13/01457	Graham
OC/IB/13/01874	Gray
OC/IB/13/01912	Gray
OC/IB/13/01909	Grayson
OC/IB/13/01910	Grayson
OC/IB/13/01464	Greaves
OC/IB/13/01482	Greaves
OC/IB/13/01627	Green
OC/IB/13/01637	Green
OC/IB/13/01506	Green and Bayley
OC/IB/13/01404	Greenhalgh
OC/IB/13/01985	Gregg
OC/IB/13/01783	Gregory
OC/IB/13/01900	Gregson
OC/IB/13/01970	Gregson
OC/IB/13/01898	Griffin
OC/IB/13/01899	Griffin
OC/IB/08/00611	Grundy
OC/IB/13/01744	Guest
OC/IB/13/01745	Guest
OC/IB/13/01858	Hadley
OC/IB/13/01859	Hadley
OC/IB/13/01860	Hadley
OC/IB/13/01836	Hagan
OC/IB/13/01425	Hall
OC/IB/13/01442	Hall
OC/IB/13/01588	Hall
OC/IB/13/01589	Hall
OC/IB/13/01842	Halliwell
OC/IB/13/01537	Halsall
OC/IB/13/01868	Halstead
OC/IB/13/01417	Hammond
OC/IB/13/01418	Hammond
OC/IB/13/01465	Hammond
OC/IB/13/01893	Hanlon
OC/IB/13/01675	Harling
OC/IB/13/01847	Harris
OC/IB/13/01411	Harrison
OC/IB/13/01422	Harrison
OC/IB/13/01654	Healey
OC/IB/13/01430	Heard

OC/IB/13/01895	Heselwood
OC/IB/13/01481	Hibbert
OC/IB/13/01488	Hibbert
OC/IB/13/01781	Higgin
OC/IB/13/01861	Higham
OC/IB/13/01994	Highton
OC/IB/13/01995	Highton
OC/IB/13/01709	Hill
OC/IB/13/01798	Hill
OC/IB/13/01940	Hilliard
OC/IB/13/01904	Hinder
OC/IB/13/01823	Hindle
OC/IB/13/01689	Hirst
OC/IB/13/01807	Hobson
OC/IB/13/01958	Hodgkinson
OC/IB/13/01566	Hodgson
OC/IB/13/01584	Hodgson
OC/IB/13/01687	Hodgson
OC/IB/13/01475	Hogarth
OC/IB/13/01855	Holland
OC/IB/13/01682	Holliday-Smith
OC/IB/11/01344	Hornby
OC/IB/13/01376	Hough
OC/IB/13/01466	Howard
OC/IB/13/01471	Howard
OC/IB/13/01813	Hoyle
OC/IB/13/01452	Huett
OC/IB/13/01780	Hughes
OC/IB/13/01724	Hulme
OC/IB/13/01427	Hunter
OC/IB/13/02007	Hunter
OC/IB/13/01496	Hutchinson
OC/IB/13/01925	Hutton
OC/IB/13/01565	Ireland
OC/IB/13/01728	Irwin
OC/IB/13/01507	Jackson
OC/IB/13/01508	Jackson
OC/IB/13/01415	James
OC/IB/13/01424	James
OC/IB/13/01988	Johnson
OC/IB/13/01413	Jones
OC/IB/13/01869	Jones
OC/IB/13/01676	Jowett
OC/IB/13/01678	Keech
OC/IB/08/00532	Keetley
OC/IB/13/01443	Kelly

Appendix 6: Preferred Option 2013: Consultation Responses

OC/IB/13/01419	Kelsey
OC/IB/13/01432	Kendal
OC/IB/13/01975	Kennedy
OC/IB/13/01817	Kerrone
OC/IB/13/01818	Kerrone
OC/IB/13/01631	Keyte
OC/IB/13/01596	Kilby
OC/IB/13/01597	Kirby
OC/IB/13/01593	Kitt
OC/IB/13/01594	Kitt
OC/IB/13/01539	Knowles
OC/IB/13/01650	Lake
OC/IB/13/01941	Lambert
OC/IB/13/01942	Lambert
OC/IB/13/01943	Lambert
OC/IB/13/01944	Lambert
OC/IB/13/01999	Lavery
OC/IB/13/01837	Lay
OC/IB/13/01838	Lay
OC/IB/13/01701	Leadbeater
OC/IB/13/01423	Lee
OC/IB/13/01598	Lesbirel
OC/IB/13/01599	Lesbirel
OC/IB/13/01412	Lever
OC/IB/13/01635	Lilley
OC/IB/13/01636	Lilley
OC/IB/13/01776	Liptrot
OC/IB/13/01641	Long
OC/IB/13/01755	Long
OC/IB/13/01527	Longworth
OC/IB/13/01960	Longworth
OC/IB/13/01385	Lord
OC/IB/13/01796	Lupton
OC/IB/13/01664	Lyall-Cottle
OC/IB/13/01808	Lytham Road Garage
OC/IB/13/01870	Maguire
OC/IB/13/01497	Mallalieu
OC/IB/13/00052	Mark Britt
OC/IB/13/01435	Marsh
OC/IB/13/01731	Marsh
OC/IB/13/01732	Marsh
OC/IB/13/01812	Marsh
OC/IB/13/01834	Marshall
OC/IB/13/01915	Marston
OC/IB/13/01456	Martin
OC/IB/13/01454	Maughan

OC/IB/13/01805	Mault
OC/IB/13/01918	Maxwell
OC/IB/13/01873	Mayers
OC/IB/13/01662	Mayor
OC/IB/13/01921	McCann
OC/IB/13/01822	McCormack
OC/IB/13/01799	McCormack-Jones
OC/IB/13/01801	McCormack-Jones
OC/IB/13/01606	McCracken
OC/IB/13/01607	McCracken
OC/IB/13/01429	McCulloch
OC/IB/13/01660	McDowall
OC/IB/13/01905	McGowan
OC/IB/13/01757	McIver
OC/IB/13/01445	McLaren
OC/IB/13/01446	McLaren
OC/IB/13/01393	Meakin
OC/IB/13/01401	Meakin
OC/IB/13/01683	Melling
OC/IB/13/01684	Melling
OC/IB/13/01710	Miller
OC/IB/13/01711	Miller
OC/IB/13/01519	Moir
OC/IB/13/01846	Molloy
OC/IB/13/01657	Monk
OC/IB/13/02012	Montgommery
OC/IB/10/01031	Moor
OC/IB/13/01543	Moore
OC/IB/13/01567	Moore
OC/IB/13/01761	Moore
OC/IB/13/01766	Moore
OC/IB/13/01881	Moore and Snape
OC/IB/13/00458	Morgan
OC/IB/13/01947	Morgan
OC/IB/13/01948	Morgan
OC/IB/13/01989	Morgan
OC/IB/13/01990	Morgan
OC/IB/13/01489	Morley
OC/IB/13/01534	Morris
OC/IB/13/01407	Morrow
OC/IB/13/01738	Moyes
OC/IB/13/01458	Musty
OC/IB/13/01459	Musty
OC/IB/13/01667	Myerscough
OC/IB/13/01835	Myerscough
OC/IB/13/01965	Myhan

Appendix 6: Preferred Option 2013: Consultation Responses

OC/IB/13/01618	Neighbour
OC/IB/13/01518	Nicholson
OC/IB/13/01897	Noblett
OC/IB/13/01697	Norcross
OC/IB/13/01748	Nulty
OC/IB/13/00234	Nuth
OC/IB/13/02013	Oates
OC/IB/13/01919	O'Donnell
OC/IB/13/01920	O'Donnell
OC/IB/13/02021	O'Hare
OC/IB/13/01894	O'Reilly
OC/IB/13/01853	Ovington
OC/IB/13/01854	Ovington
OC/IB/13/01976	Parker
OC/IB/13/02006	Parkes
OC/IB/13/01433	Pate
OC/IB/13/01434	Pate
OC/IB/13/01727	Pemberton
OC/IB/13/01509	Pendlebury
OC/IB/13/01510	Pendlebury
OC/IB/13/01787	Pendlebury
OC/IB/13/01602	Peters
OC/IB/13/01955	Petrus
OC/IB/13/01956	Petrus
OC/IB/13/01666	Picking
OC/IB/13/01690	Picking
OC/IB/08/00536	Pitman
OC/IB/13/01623	Potter
OC/IB/13/01973	Prescott
OC/IB/13/01974	Prescott
OC/IB/13/01742	Price
OC/IB/13/01743	Price
OC/IB/13/01856	Price
OC/IB/13/01439	Priestley
OC/IB/13/01927	Pugh
OC/IB/13/01928	Pugh
OC/IB/13/01504	Radcliffe
OC/IB/13/01778	Ramshaw
OC/IB/13/01797	Rawnsley
OC/IB/13/01804	Rayton
OC/IB/13/01542	Read
OC/IB/13/01917	Reed
OC/IB/13/01993	Reed
OC/IB/13/01653	Reid
OC/IB/13/01699	Reid
OC/IB/13/01619	Renga

OC/IB/13/01946	Reynolds
OC/IB/13/01493	Richardson
OC/IB/13/02001	Rielly
OC/IB/13/01772	Rigby
OC/IB/13/01773	Rigby
OC/IB/13/01793	Roberts
OC/IB/13/01865	Roberts
OC/IB/13/01694	Robertson
OC/IB/13/01428	Robinson
OC/IB/13/02011	Robinson
OC/IB/13/01576	Rose
OC/IB/13/01577	Rose
OC/IB/12/01167	Rowe
OC/IB/10/01126	Roy Gregory
OC/IB/13/01431	Russell
OC/IB/13/01581	Rygg
OC/IB/13/01884	Sanderson
OC/IB/13/01885	Sanderson
OC/IB/13/01979	Sandiford
OC/IB/13/01695	Sands
OC/IB/13/01696	Sands
OC/IB/13/01984	Sansome
OC/IB/13/01628	Sawyer
OC/IB/13/01629	Sawyer
OC/IB/13/01888	Schofield
OC/IB/13/01505	Scott
OC/IB/13/01708	Scott
OC/IB/13/01863	Scott
OC/IB/13/01864	Scott
OC/IB/13/01864	Scott
OC/IB/13/01677	Searing
OC/IB/13/02016	Sellars
OC/IB/13/01991	Shaw
OC/IB/13/01501	Shepherd
OC/IB/13/01500	Short
OC/IB/13/01819	Siddall
OC/IB/13/01820	Siddall
OC/IB/13/01821	Siddall
OC/IB/13/01608	Sidebottom
OC/IB/13/01827	Sidebottom
OC/IB/13/01436	Simpson
OC/IB/13/01685	Singleton
OC/IB/13/01971	Skelly
OC/IB/13/01851	Slinger
OC/IB/13/01852	Slinger
OC/IB/13/01926	Smalley

Appendix 6: Preferred Option 2013: Consultation Responses

OC/IB/13/01867	Smart
OC/IB/13/00324	Smith
OC/IB/13/01523	Smith
OC/IB/13/01625	Smith
OC/IB/13/01704	Smith
OC/IB/13/01735	Smith
OC/IB/13/01825	Smith
OC/IB/13/01891	Smith
OC/IB/13/01923	Smith
OC/IB/13/01930	Smith
OC/IB/13/01964	Smith
OC/IB/13/01997	Smith
OC/IB/13/02015	Smith
OC/IB/13/01616	Soames
OC/IB/13/01615	Spring
OC/IB/13/01932	Stamp
OC/IB/13/01406	Starkie
OC/IB/13/01673	Steel
OC/IB/13/01896	Stevens
OC/IB/13/01712	Stewart
OC/IB/13/01713	Stewart
OC/IB/13/01913	Stickland
OC/IB/13/01914	Stickland
OC/IB/13/01502	Stockdale
OC/IB/13/01810	Stride
OC/IB/13/01467	Studley
OC/IB/13/01468	Studley
OC/IB/13/01911	Swan
OC/IB/13/01806	Swindells
OC/IB/13/01736	Sydorsky
OC/IB/13/01737	Sydorsky
OC/IB/13/01590	Taaffe
OC/IB/13/01857	Tattersall
OC/IB/13/01410	Taylor
OC/IB/13/01840	Taylor
OC/IB/13/01559	Teasdale
OC/IB/13/01586	Teasdale
OC/IB/13/01887	Thompson
OC/IB/13/00047	Thorpe
OC/IB/13/01477	Tibbs
OC/IB/13/02008	Tilly
OC/IB/13/01811	Tomlinson
OC/IB/13/01450	Twemlow
OC/IB/13/01688	Vallely
OC/IB/13/01721	Vallely
OC/IB/13/01739	Virco

OC/IB/13/01747	Virco
OC/IB/10/01086	W and T Rowe
OC/IB/13/01486	Waite
OC/IB/13/01492	Waite
OC/IB/13/01803	Wall
OC/IB/13/01632	Walmsky
OC/IB/13/01555	Wanstall
OC/IB/13/02025	Ward
OC/IB/13/01754	Warde
OC/IB/13/01826	Warwick
OC/IB/13/01583	Watson
OC/IB/13/01399	Watts
OC/IB/13/00526	Webb
OC/IB/11/01346	Webbeley
OC/IB/13/01794	Webberley
OC/IB/13/01416	Wells
OC/IB/13/01455	Wells
OC/IB/13/01526	Wells
OC/IB/13/01762	Whaite
OC/IB/08/00650	Whalley
OC/IB/13/01440	Wharton
OC/IB/13/01886	Whattam
OC/IB/13/01902	Wheldon
OC/IB/13/01491	White
OC/IB/13/02009	Whiteside
OC/IB/13/01402	Whittle
OC/IB/13/01511	Whittle
OC/IB/13/01763	Widdows
OC/IB/13/01658	Wilkins
OC/IB/13/01659	Wilkinson
OC/IB/13/01843	Wilkinson
OC/IB/13/01844	Wilkinson
OC/IB/13/01845	Wilkinson
OC/IB/13/01791	Williams
OC/IB/13/01669	Willis
OC/IB/13/01611	Wilson
OC/IB/13/01848	Wilson
OC/IB/13/01849	Wilson
OC/IB/13/01850	Wilson
OC/IB/13/01546	Wintle
OC/IB/13/02005	Wiseman
OC/IB/13/01671	Wood
OC/IB/13/01792	Wood
OC/IB/13/01907	Wood
OC/IB/13/01903	Worthington
OC/IB/13/01397	Wright

OC/IB/13/01444	Wright
OC/IB/13/01538	Wright
OC/IB/13/01613	Wright
OC/IB/13/01741	Wright
OC/IB/13/01750	Wright
OC/IB/13/01998	Wright
OC/IB/13/02000	Wright
OC/IB/13/02002	Wright
OC/IB/13/01809	Yates
OC/IB/13/01451	York
OC/IB/13/01560	Young
OC/IB/13/01561	Young
Infrastructure Providers – 3	
OC/ISP/11/01347	Essar Oil (UK)
OC/ISP/08/00694	Health & Safety Executive
OC/ISP/10/01013	Health and Safety Executive Nuclear
Land Owners – 7	
OC/LO/13/01647	Blackpool Busines Park 2 Limited
OC/LO/13/01768	Co-operative Estates
OC/LO/13/01644	Great Birchwood Country Park Ltd
OC/LO/13/01645	Hollins Strategic Land LLP
OC/LO/12/00968	Mactaggart and Mickel
OC/LO/12/00948	Metacre Ltd
OC/LO/13/01642	Telereal Trillium
Local Property Developers – 7	
OC/LPD/12/00928	Bloor Homes
OC/LPD/13/01646	Gladman Developments
OC/LPD/08/00747	Kensington Developments Ltd
OC/LPD/13/01767	McCarthy and Stone Retirement Lifestyles Ltd
OC/LPD/08/00722	Morris Homes (North) Ltd
OC/LPD/13/01540	Redrow Homes Lancashire
OC/LPD/08/00725	Windmill Group of Companies
Nature Conservation/Countryside – 1	
OC/NCC/08/00771	National Farmers Union
Recreational Bodies – 1	
OC/RB/13/01541	The Boys' Brigade
Sports Clubs/Bodies – 3	
OC/SC/B/13/01371	Lytham St Annes Cycle Group
OC/SC/B/13/01495	Pendle Production Ltd
OC/SC/B/13/01548	Warton Typhoons FC
Schools – 4	
OC/SCH/08/00868	Carr Hill High School
OC/SCH/08/00874	Holy Family Catholic Primary School
OC/SCH/12/00997	Kirkham Grammar School
OC/SCH/13/01720	National Union of Teachers Fylde Association
Transport Bodies – 2	

OC/TB/13/01649	Blackpool International Airport Ltd C/O Nathaniel Lichfield and Partners
OC/TB/13/01734	Centrica Plc - Heliport Terminal C/O BNP Paribas Real Estate
Local Authorities – 5	
SCB/LA/08/00388	Blackpool Council, Head of Planning
SCB/LA/08/00396	Lancashire County Council, Property Group
SCB/LA/10/01110	Lancashire County Council, Richard Camp
SCB/LA/08/00390	South Ribble Borough Council
SCB/LA/08/00391	Wyre Borough Council
Parish Councils – 10	
SCB/PC/08/00416	Bryning with Warton Parish Council
SCB/PC/08/00408	Elswick Parish Council
SCB/PC/08/00409	Greenhalgh with Thistleton Parish Council
SCB/PC/08/00405	Kirkham Town Council
SCB/PC/08/00403	Medlar with Wesham Town Council
SCB/PC/08/00406	Newton with Clifton Parish Council
SCB/PC/08/00414	Ribby with Wrea Green Parish
SCB/PC/08/00411	Singleton Parish Council
SCB/PC/08/00412	Treales, Roseacre and Wharles Parish Council
SCB/PC/08/00410	Westby with Plumpton Parish Council
Specific Consultation Bodies – 12	
SCB/SCB/08/00363	CPRE - Fylde District
SCB/SCB/13/01388	Electricity North West Ltd
SCB/SCB/08/00350	English Heritage
SCB/SCB/08/00351	Environment Agency
SCB/SCB/08/00347	Highways Agency
SCB/SCB/13/01517	Lancashire Enterprise Partnership
SCB/SCB/08/00697	Mobile Operators Association
SCB/SCB/08/00343	Natural England Government Team South
SCB/SCB/08/00354	The Wildlife Trust for Lancashire
SCB/SCB/08/00355	United Utilities North West
OC/SC/B/08/00845	Sport England
SCB/SCB/14/02042	Lancashire Sport Partnership Ltd

Appendix 7

Revised Preferred Option 2015: Consultation Material



Please Ask for: Planning Policy Team

Telephone: 01253 658418

Email: planningpolicy@fylde.gov.uk

Date: 12 October 2015

Dear Sir/Madam

FYLDE LOCAL PLAN TO 2032: REVISED PREFERRED OPTION CONSULTATION IN ACCORDANCE WITH REGULATION 18 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

I am writing to inform you that the Fylde Local Plan to 2032 - Revised Preferred Option (RPO) will be published for consultation, along with accompanying technical assessments, the Infrastructure Delivery Plan and the Statement of Community Involvement (SCI), for a seven week period from 15 October to 3 December 2015.

Regulation 18(1)(b) states that a Local Planning Authority must invite you to make representations about what a Local Plan ought to contain, that is the scope of the document. The scope of the Local Plan has changed since the Preferred Option stage in 2013, it includes strategic and non-strategic allocations for new homes and employment land, leisure, retail, tourism and community use, or a mixture of such uses. The Local Plan also comprises development management policies, which will inform decisions on planning applications; together with policies to define areas of open space and town centre boundaries and to protect the natural and built environment and heritage assets. The council therefore invites comments on both the scope and content of the Local Plan to 2032.

The RPO version is an important stage in the preparation of the Local Plan. The plan will be available to view and for public discussion at a series of drop-in community engagement events starting on 19 October 2015:

Date	Location	Time
Monday 19 October	Wrea Green – Wrea Green Institute, Station Road, Wrea Green Preston, PR4 2PH	3pm – 7pm
Tuesday 20 October	Staining – St Luke’s Church, Staining Road, Staining, FY3 0BW	3pm – 7pm
Wednesday 21 October	Elswick – Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD	3pm – 7pm
Thursday 22 October	Warton – Warton Village Hall, Church Road, Warton, Preston, PR4 1BD	3pm – 7pm
Tuesday 27 October	Wesham - Kirkham and Wesham Scout Centre, Church Road, Wesham PR4 3DR	3pm – 7pm
Wednesday 28 October	Newton – Newton Village Hall, Vicarage Lane, Newton, Preston, PR4 3RX	3pm – 7pm
Tuesday 3 November	St Annes – Fylde Council, Town Hall, St Annes, FY8 1LW (Foyer Area)	3pm -7pm
Wednesday 4 November	Marton (Blackpool) – St Monica’s Church, 26 Glastonbury Avenue, Blackpool, FY1 6RD	3pm – 7pm
Thursday 5 November	Kirkham – Kirkham Community Centre, Mill Street, Kirkham, Preston, PR4 2AN	3pm – 7pm

Appendix 7: Revised Preferred Option 2015: Consultation Material

The RPO version of the Local Plan, including the supporting technical assessments, together with the Draft Infrastructure Delivery Plan and the SCI will be available to view on-line at www.fylde.gov.uk/localplan/ at Fylde Direct (hard copy) and at libraries (electronically) throughout the borough for the duration of the consultation.

Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

The quickest and easiest way to submit comments on both the scope and the content is by using our online interactive consultation system which can be accessed via the following link:

www.fylde.gov.uk/localplan/

You will be able to save draft comments as well as view comments made by other consultees once vetted by the Council.

Comment forms can be submitted in a number of other ways:

- The comments form at www.fylde.gov.uk/localplan/ can be emailed to us at planningpolicy@fylde.gov.uk; and alternatively
- Comments forms can also be posted to us at: FREEPOST BJ952, Revised Preferred Option Consultation, Planning Policy, Fylde Council, Town Hall, St Annes, FY8 1LW

The deadline for submitting comments is **5pm on Thursday 3 December 2015**. Please note the council cannot guarantee that any comments received after the consultation deadline will be considered.

If you require assistance in formulating and submitting your comments form, or have a query about any aspect of this consultation, please contact the Planning Policy Team on 01253 658418 or email planningpolicy@fylde.gov.uk You can also contact your local ward Councillor for further advice.

Please note that all comments must be submitted in writing and must contain your contact details. Comments cannot be treated as confidential. All responses will be published on our website, although we will not publish any personal details. We will take all comments, the results of the technical assessments and any emerging evidence, into account in preparing the next stage of the Local Plan – the Publication version. Greater weight will be given to comments that are supported by evidence.

You are receiving this letter because your contact details are held on our Register of Consultees database. If you no longer wish to be consulted on Planning Policy matters, and/or the contact details are incorrect, please let us know either by phone 01253 658418 or email planningpolicy@fylde.gov.uk

Yours faithfully,



Julie Glaister
Planning Policy Manager

Town Hall, Lytham St. Annes, Lancashire, FY8 1LW
Telephone: 01253 658658 Fax: 01253 713113 Web: www.fylde.gov.uk

Poster:

Plan for Fylde - Plan for the Future

FYLDE LOCAL PLAN to 2032

Revised Preferred Option Consultation

STARTS • Thursday 15 October
ENDS • 5pm on Thursday 3 December 2015

The council wants your views on the scope and content of the Revised Preferred Option for planning Fylde's future. To find out more, come to a drop in event listed below, or visit Fylde Direct at St Annes, visit libraries across Fylde borough or go online.

MON 19 OCT • WREA GREEN • 3pm - 7pm
 Wrea Green Institute, Station Road, Wrea Green Preston, PR4 2PH

TUES 20 OCT • STAINING • 3pm - 7pm
 St Luke's Church, Staining Road, Staining, FY3 0BW

WED 21 OCT • ELSWICK • 3pm - 7pm
 Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD

THURS 22 OCT • WARTON • 3pm - 7pm
 Warton Village Hall, Church Road, Warton, Preston, PR4 1BD

TUES 27 OCT • WESHAM • 3pm - 7pm
 Kirkham and Wesham Scout Centre, Church Road, Wesham, PR4 3DR

WED 28 OCT • NEWTON • 3pm - 7pm
 Newton Village Hall, Vicarage Lane, Newton, Preston, PR4 3RX

TUES 03 NOV • ST ANNES • 3pm - 7pm
 Fylde Council, Town Hall, St Annes Road West, Lytham and St Annes, FY8 1LW (Foyer Area)

WED 04 NOV • MARTON-BLACKPOOL • 3pm - 7pm
 St Monica's Church, 26 Glastonbury Avenue, Blackpool, FY16RD

THURS 05 NOV • KIRKHAM • 3pm - 7pm
 Community Centre, Mill Street, Kirkham, Preston, PR4 2AN



Fylde's Local Plan will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. The **Fylde Local Plan to 2032** includes allocations for new homes, employment land, leisure, retail, tourism and community uses. It will also contain development management policies, which will inform decisions on planning applications; together with policies relating to areas of open space, town centre boundaries, protection of natural and built environments and heritage assets. It proposes:

- A minimum 7,700 new homes
- 56.3 hectares of new employment land
- 4 Strategic Locations for Development:
 - Lytham and St Annes;
 - Warton;
 - Kirkham and Wesham; and
 - Fylde-Blackpool periphery
- New infrastructure, services and facilities



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 Ordnance Survey (100006084).



For further information, please contact the Planning Policy Team: 01253 658418, or email planningpolicy@fylde.gov.uk

www.fylde.gov.uk/localplan/



FYLDE LOCAL PLAN to 2032

Summary Leaflet

Revised Preferred Option Consultation

Starts Thursday 15 October

Ends 5.00pm on Thursday 3 December 2015



Fylde Council has prepared a Revised Preferred Option (RPO) version of the Fylde Local Plan to 2032 (Local Plan). The Local Plan will guide development in the borough from 2011 to 2032. It will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. The RPO version includes strategic and non-strategic allocations for new homes and employment land, leisure, retail, tourism and community use, or a mixture of such uses. The RPO also comprises of development management policies, which will inform decisions on planning applications; together with policies to define areas of open space and town centre boundaries and to protect the natural and built environment and heritage assets.



Plan for Fylde - Plan for the Future

Why should you get involved?

Planning shapes the places where we live, work and socialise. It improves the social, economic and natural environment of communities.

The council is keen to seek your views on the scope and content of the RPO and its preferred approach for planning Fylde's future. Do you agree with the proposals and if not why not? We have developed this booklet to give you a summary of the proposals and information about how you can submit your comments.

The RPO is also subject to several technical assessments during its preparation. We are also keen to seek your views on the technical assessments, which include:

- **Habitats Regulation Assessment**
- **Health Impact Assessment**
- **Rural Proofing Assessment**
- **Sustainability Appraisal**
- **Viability Assessment**

What is the Revised Preferred Option document?

The document has been prepared using the results of previous public consultations on the Local Plan and the results of technical assessments, emerging evidence and government guidance.

The RPO document contains a vision, strategic objectives and development strategy that sets out how the council would like Fylde borough to look in 2032. When adopted the Fylde Local Plan to 2032 will replace the current adopted Fylde Borough Local Plan (As Altered: October 2005) and will be used to determine planning applications, allowing the council to direct development to sustainable locations.

Proposals include:

- The delivery of a minimum 7,700 new homes
- 56.3 hectares of new employment land
- Four strategic locations for development at:
 - Lytham and St Annes;
 - Warton;
 - Kirkham and Wesham; and
 - Fylde-Blackpool periphery.
- Sustainable allocations for development at rural settlements
- New Infrastructure, services and facilities

We want to hear from you,
have your say
 using the following link:

Fylde Local Plan to 2032 timetable

Vision, Issues and Objectives
(February 2011)

Regulation 25 Scoping Document
(May 2011)

Issues and Options
(June 2012)

Preferred Options Part 1
(June 2013)

Revised Preferred Option (RPO)
(October 2015)

Local Plan Publication Version
(August 2016)

Examination
(January 2017)

Adoption
(March 2017)

Why is the council planning for development?

The council is required to produce a Local Plan to guide development in Fylde to 2032.

The RPO complies with national planning guidance, called the National Planning Policy Framework (the Framework) which has a presumption in favour of sustainable development. Sustainable means 'ensuring that better lives for ourselves don't mean worse lives for future generations' and development means 'growth'.

Not planning for development is not an option, as this is not sustainable. Failing to plan for development in line with Fylde's assessed development needs could lead to unplanned development being approved at planning appeals.

Sustainable development is about positive growth – making economic, environmental and social progress from this and future generations. Planning for development is about helping make this happen.



Where will development go?

New development will be focused within the existing settlement boundaries. Important features such as public open spaces will be protected. However, there is insufficient land for all of the development needed and some development must take place on the edge of existing settlement boundaries. These are sustainable locations with access to services and infrastructure. Previously developed land will be used in preference to greenfield areas, wherever possible.

There are some significant local assets and key designations which make Fylde distinctive. The land the council proposes to allocate is not located within Green Belt, Areas of Separation, area's at greatest risk of flooding, protected landscapes or areas of biodiversity interest.

Will the infrastructure cope?

The Local Plan must be 'deliverable' this means ensuring there is sufficient infrastructure available, for example, highways, energy, water and sewer capacity, school places, doctors, parks and open spaces.

The council is required to produce an Infrastructure Delivery Plan (IDP) alongside the Local Plan. This sets out the infrastructure required to overcome existing shortfalls and to accommodate the level of growth proposed in the RPO.

We are also keen to seek your views on the draft Infrastructure Delivery Plan.

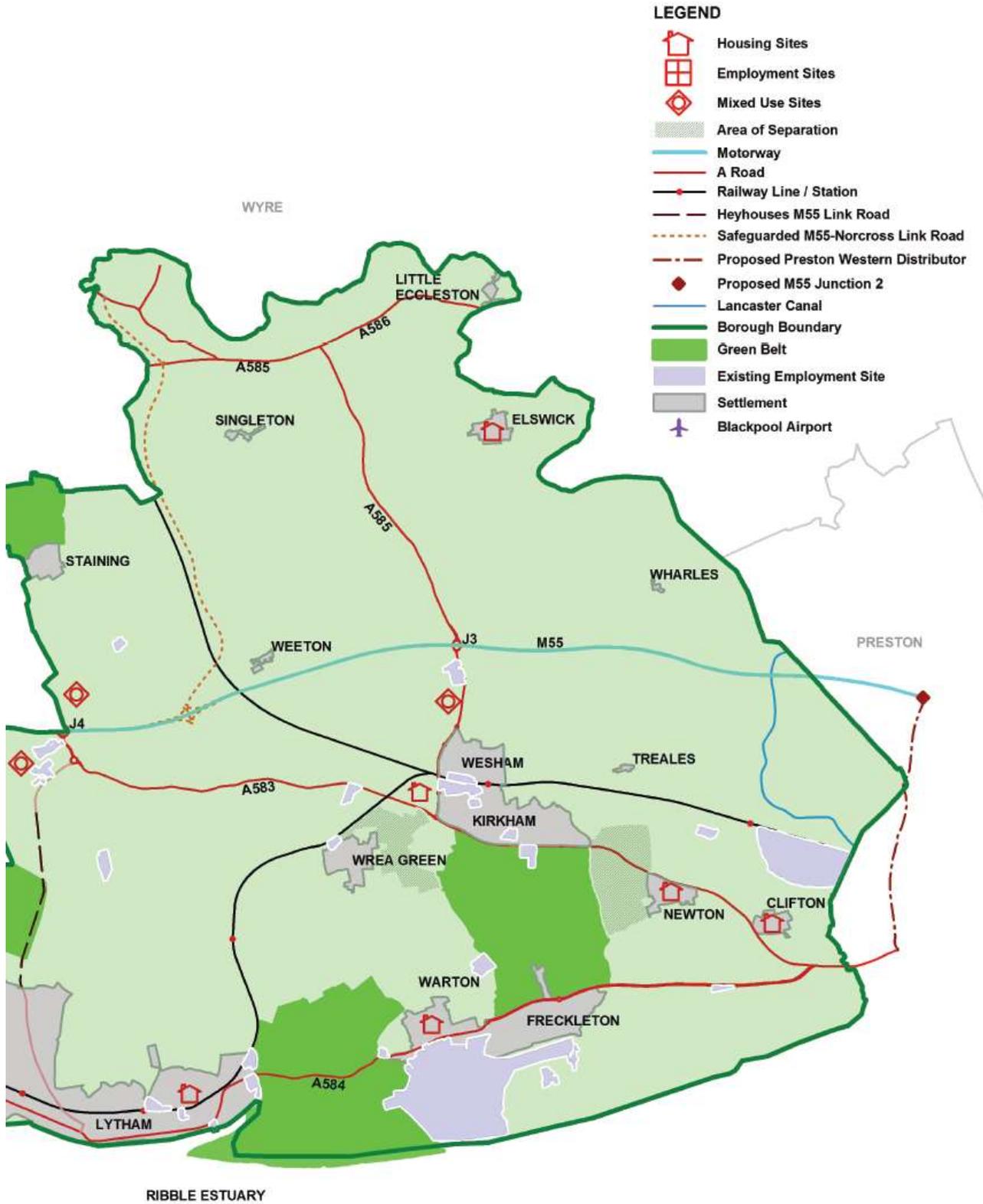
It will be necessary to phase development so that it coincides with construction, upgrading or expansion of certain types of infrastructure. Without the necessary infrastructure, development could not take place.



The following indicative diagram shows key proposed allocations to 2032 which are in addition to existing commitments since 2011.

Full details of the proposals can be found in the Fylde Local Plan to 2032-Revised Preferred Option document.





Fylde Council. (c) Crown Copyright and database right (2015). Ordnance Survey (100006084).

The four Strategic Locations for Development 2011 - 2032:

Lytham and St Annes

2,020 new homes including:

Planning permission granted at

- Queensway (1,150 homes)
- Lytham Quays (120 homes)

Planning permission granted and allocation at

- Heyhouses (250 homes)

5.4 hectares of employment land

New public open space and a new primary school provided at Queensway

New Heyhouses M55 Link Road will be provided

Fylde-Blackpool Periphery

2,728 new homes including:

Planning permission granted at

- Coastal Dunes (348 homes)

Planning permission granted and allocations at

- Cropper Road East (372 homes)
- Lytham St Annes Way (150 homes)

Allocations at

- Whyndyke Farm (1,310 homes)
- Cropper Road East (442 homes)

47.4 hectares of employment land

Proposed new local service centre at Whitehills

Proposed new primary school at Whyndyke Farm

Warton

650 new homes including:

Planning permission granted at

- Highgate Park (254 homes)

Proposed new local service centre

Continue to support the specialised activity at the Lancashire Enterprise Zone at BAE Systems

Two new Gypsy and Travellers pitches at land at The Stackyard, Bryning Hall Lane

Transport improvements, including the Preston Western Distributor (within Preston) providing access to a new junction 2 on the M55 motorway

Kirkham and Wesham

1,142 new homes including:

Planning permission granted at

- The Pastures (262 homes)
- Willowfields (124 homes)

Planning permission granted and allocations at

- Land North of Blackpool Road (588 homes)

1.1 hectares of new employment land, including leisure and retail at Mill Farm Sports Village

Two Areas of Separation

The council has granted planning permission for housing developments since the plan period commenced in April 2011. These homes will count towards the RPO's housing requirement for 2011 to 2032.

Outside the four Strategic Locations for Development 2011 - 2032:



We want to hear from you,
have your say
using the following link:

www.fylde.gov.uk/localplan/

Neighbourhood Planning

Neighbourhood Planning is a new way for communities to shape the future of the places where they live and work. Neighbourhood Planning cannot be used to stop development happening, however it will allow communities to decide where they want new development to be built and what those new developments should look like.

Once a Neighbourhood Development Plan is formally adopted it will become part of the Development Plan that will be used to direct development and determine planning applications.

The following Parish Councils have formally commenced work on their Neighbourhood Development Plan:

- Ribby-with-Wrea Parish Council
- Staining Parish Council
- St Annes on the Sea Town Council
- Bryning-with-Warton Parish Council

Elswick Parish Council have expressed an interest in preparing a Neighbourhood Development Plan.

Gypsies, Travellers and Travelling Showpeople's Sites

In the Fylde borough, a total of 26 extra pitches for Gypsies and Travellers are required up to the year 2031, with no plots required for Travelling Showpeople.

So far, the council have identified 6 new pitches:

- 2 at land at The Stackyard, Bryning with Warton
- 4 at land at Thames Street, Newton

Do you have any land that could be used to accommodate Gypsies and Travellers?

What else are we proposing?

The RPO includes defined town, district and local centre boundaries; together with retail frontages, the boundaries of the Holiday Areas in St Annes and the Island Seafront Area in St Annes.

We want to hear from you,
have your say
using the following link:



Areas of Separation (AOS)

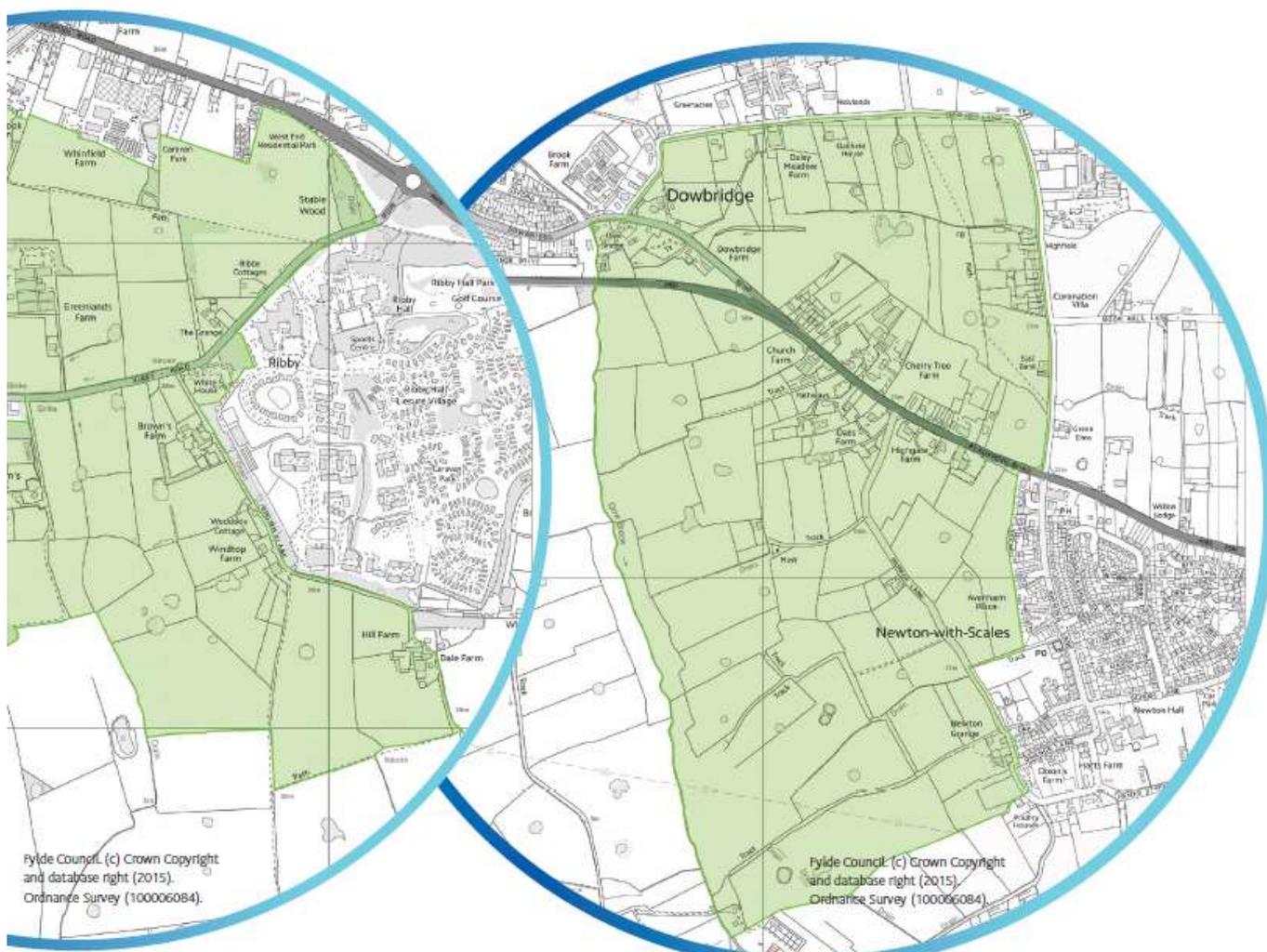
Two AOS are proposed in the borough at land between:

- Kirkham and Newton, and
- Wrea Green and Kirkham.

These AOS have been proposed in order to preserve the character and distinctiveness of the two individual settlements.

The AOS will restrict inappropriate development that would result in the merging of the settlements.

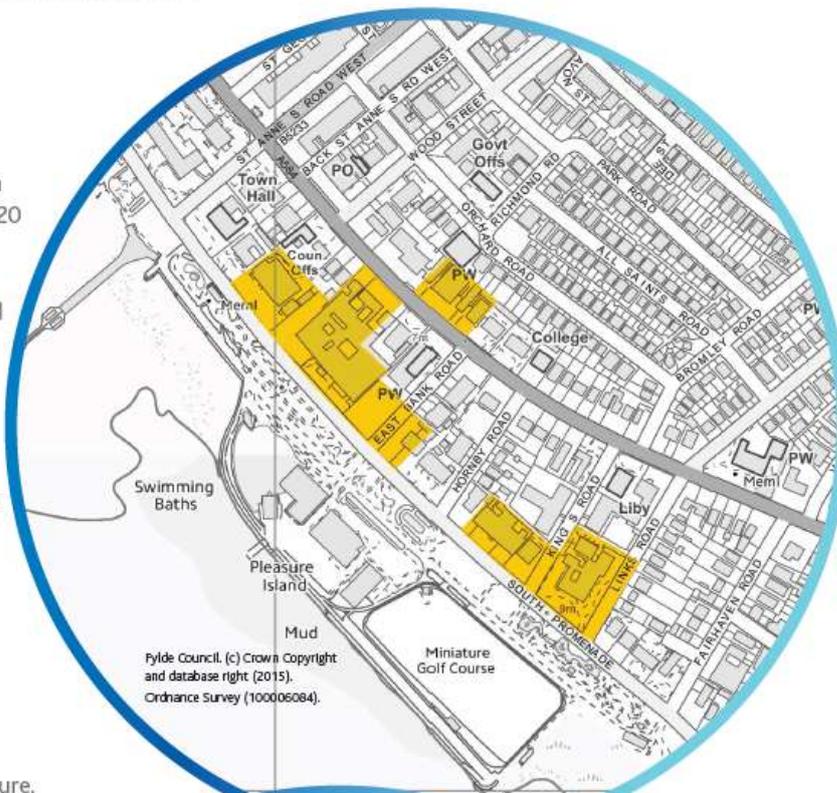
- Any proposed development in these areas will be assessed in terms of its impact upon the Areas of Separation.
- Extensions to existing homes will be permitted within the Areas of Separation.
- No new homes will be permitted within the curtilage of existing homes in the Areas of Separation.
- The Areas of Separation will be a focus for Green Infrastructure.



Holiday Areas

The borough attracts over three million visitors each year generating nearly £220 million spending in the local economy through a total of 4.25 million tourist days. The tourism economy is the third largest employer in the area.

With this in mind the council has identified Holiday Areas in the Local Plan, which are located adjacent to tourism facilities, St Annes town centre and the beach, in order to protect and promote tourism accommodation in these areas.



Sea Front Area

The Island Sea Front Area consists of a unique concentration of large scale leisure, culture and tourism uses in St Annes. The lack of indoor all year attractions at St Annes means it is important to protect this area as a focus for leisure, culture and tourism uses whilst at the same time facilitating new appropriate uses. This will enable the area to thrive and respond to changing market conditions and provide an all year round offer.



We want to hear from you, have your say using the following link:

www.fylde.gov.uk/localplan/

Development Management Policies

The council uses Development Management policies to assess and determine planning applications and also to direct applicants at pre-application stage.

At previous consultations we asked you about the issues that affected you and requested your comments on which options we should take forward. The RPO document includes policies to address the issues raised by evidence collected and responses to previous consultations.

General

The RPO includes policies on the Green Belt, Areas of Separation, development in the countryside, promoting mixed use development and achieving good design in development.

Economy

Policies regarding the economy cover the overall provision of employment land and existing employment sites; the retail hierarchy, which is based upon vibrant town, district and local centres; leisure, culture and tourism development and tourism accommodation in the classic seaside resorts.

Housing

Policies on allocation of housing land; density, mix and design of new residential development; conversions and change of use to residential; the provision of affordable housing; Gypsies, Travellers and Travelling Showpeople's Sites;

Infrastructure, Transport and Services

Policies on Infrastructure, Service Provision and Transport with a focus on developer contributions and the Community Infrastructure Levy (CIL); strategic highway improvements; safeguarding Blackpool Airport as an operational airport; and enhancing sustainable transport choice. It is proposed that parking standards will be the subject of a separate supplementary planning document.

Environment and Heritage

Policies on conserving and enhancing the natural, historic and built environment will cover planning issues relating to landscape; biodiversity; protecting existing and providing additional open space and Green Infrastructure; the management and enhancement of open space; and the protection of Heritage Assets including Listed Buildings, Conservation Areas and Registered Historic Parks and Gardens. Policies also cover water resource management, flood risk and addressing climate change focusing on flood alleviation, water quality and water efficiency; surface water run-off and sustainable drainage; renewable and low carbon energy generation; decentralised energy networks and district heating systems.

Have we included everything?

Does the RPO cover everything you think it should? Are there any local issues that have not been covered?

Have your say...

The RPO version of the Local Plan, including the supporting technical assessments, together with the Draft Infrastructure Delivery Plan (IDP) will be available to view on-line at www.fylde.gov.uk/localplan/

A hard copy can be viewed at Fylde Direct in St Annes and electronic copies can be accessed at local libraries throughout the borough for the duration of the consultation. Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

If you require assistance in formulating and submitting your comments form, please contact the Planning Policy Team. You can also contact your local ward Councillor for further advice.



For more information on the Local Plan, please scan this QR code with a Smartphone

Submit your comments

The quickest and easiest way to submit comments on both the scope and the content of the RPO is by using our online interactive consultation system via the following link: www.fylde.gov.uk/localplan/. You will be able to save draft comments as well as view comments made by other consultees once vetted by the council. Alternatively you can download the comments form at www.fylde.gov.uk/localplan/ and send your completed comment forms to us at:

Email: planningpolicy@fylde.gov.uk

Post:

FREEPOST BJ952,
Preferred Options Consultation,
Planning Policy,
Fylde Council,
Town Hall,
St Annes,
FY8 1LW



We want to hear from you, have your say

using the following link:

www.fylde.gov.uk/localplan/

So what happens next?

After the Revised Preferred Option consultation, the council will consider all of the comments received. The council will also consider the findings of the technical assessments, any new evidence and changes to Government guidance. All of this information will be used to write the Publication Version which will form the final round of consultation on the Local Plan to 2032, following which the document will be submitted (i.e. the Submission version) to the Secretary of State, who will appoint an independent Inspector to carry out an Examination in Public (EiP) into the document.

The deadline for consultation responses is 5pm on Thursday 3 December 2015. The council cannot guarantee that responses received after the consultation deadline will be considered.

This will give an independent Planning Inspector the opportunity to test the soundness of the document, in terms of the Local Plan's justification, effectiveness, consistency with national policy and whether it is positively prepared.



For further information, please contact the Planning Policy Team:

Planning Policy
Fylde Council
Town Hall
Lytham St Annes
Lancashire
FY8 1LW

Tel: 01253 658418

Email: planningpolicy@fylde.gov.uk

If you want this information in large print, audio, braille or another language please call 01253 658658



Date: 12 October 2015

Press Release

Have your say on planning Fylde's future - This is your chance to be involved in shaping Fylde's future.

The council is preparing a Local Plan which will guide development in the borough to 2032. It will ensure new homes, jobs and services are developed in the most sustainable locations, along with the necessary infrastructure and facilities. The Fylde Local Plan to 2032 includes strategic and non-strategic sites for new homes and employment land, leisure, retail, tourism and community use, or a mixture of such uses. The Local Plan also comprises development management policies, which will inform decisions on planning applications; together with policies to define areas of open space and town centre boundaries and to protect the natural and built environment and heritage assets.

Councillor Trevor Fiddler, chairman of the Development Management Committee at Fylde council, said: *"The Local Plan is intended to ensure that future building and development in the borough meets people's needs."*

"I hope that as many people as possible will get involved in the process and have their say: it is a hugely important document."

"Development can't be random. It has to be planned for people's needs. When the Plan is adopted in 2017 – we will be able to steer developers in the direction we want them to go."

"No area can stand still forever. We want change, however, to be sympathetic to the distinctive character and heritage of the area."

Councillor Trevor Fiddler added: *"It is vital for everyone's sake that we get this right. We are making the process as open as possible and I urge people to view the document and maps and tell us what they think."*

The Revised Preferred Option version is an important stage in the preparation of the Local Plan. The plan will be available to view and for public discussion at the following 'drop-in' community engagement events between 19 October and 5 November 2015:

Date	Location	Time
Monday 19 October	Wrea Green – Wrea Green Institute, Station Road, Wrea Green Preston, PR4 2PH	3pm – 7pm
Tuesday 20 October	Staining – St Luke’s Church, Staining Road, Staining, FY3 0BW	3pm – 7pm
Wednesday 21 October	Elswick – Elswick Village Hall, Roseacre Road, Elswick, PR4 3UD	3pm – 7pm
Thursday 22 October	Warton – Warton Village Hall, Church Road, Warton, Preston, PR4 1BD	3pm – 7pm
Tuesday 27 October	Wesham – Kirkham and Wesham Scout Centre, Church Road, Wesham, PR4 3DR	3pm – 7pm
Wednesday 28 October	Newton – Newton Village Hall, Vicarage Lane, Newton, Preston, PR4 3RX	3pm – 7pm
Tuesday 3 November	St Annes – Fylde Council, Town Hall, St Annes, FY8 1LW (Foyer Area)	3pm - 7pm
Wednesday 4 November	Marion (Blackpool) – St Monica’s Church, 26 Glastonbury Avenue, Blackpool, FY1 6RD	3pm – 7pm
Thursday 5 November	Kirkham – Kirkham Community Centre, Mill Street, Kirkham, Preston, PR4 2AN	3pm – 7pm

The Revised Preferred Option consultation document, the supporting technical assessments, the Infrastructure Delivery Plan and the Statement of Community Involvement will be available for inspection at www.fylde.gov.uk/localplan/ in Fylde Libraries (electronically) and at Fylde Direct (hard copy) at 292 Clifton Drive North, St Annes, FY8 1LH.

The quickest and easiest way to submit comments on both the scope and the content is by using our online interactive consultation system, which can be accessed via the following link: www.fylde.gov.uk/localplan/ . You will be able to save draft comments as well as view comments made by other consultees once vetted by the council.

Comment forms can also be submitted in a number of other ways:

- The comments form at www.fylde.gov.uk/localplan/ can be emailed to us at planningpolicy@fylde.gov.uk; and alternatively
- Comments forms can also be posted to us at FREEPOST BJ952, Revised Preferred Option Consultation, Planning Policy, Fylde Council, Town Hall, St Annes, FY8 1LW

The deadline for submitting comments is **5.00 pm Thursday 3 December 2015**. Please note the council cannot guarantee that any comments received after the consultation deadline will be considered.

If you require assistance in formulating and submitting your comments form, or have a query about any aspect of this consultation, please do not hesitate to contact the Planning Policy Team on 01253 658418 or email planningpolicy@fylde.gov.uk You can also contact your local ward Councillor for further advice.

END

Notes to editors: For more information about this press release, please call Mark Evans, Head of Planning and Regeneration on 01253 658460 or Julie Glaister, Planning Policy Manager on 01253 658687.

Fylde Local Plan to 2032: Revised Preferred Option



Comments Form

Office Use only
Ref:
Date Received:
Date Acknowledged:

If you have any comments you wish to make regarding the scope and content of the Revised Preferred Option version of the Local Plan, the quickest and easiest way is by using the council's online interactive consultation system, which can be accessed via the following link: www.fylde.gov.uk/localplan/. You will be able to save draft comments as well as view comments made by other consultees once vetted by the council.

If you prefer, you can email the comments form to us at planningpolicy@fylde.gov.uk or you can post it to us using the FREEPOST address at the bottom of the page.

The Revised Preferred Option document, including the supporting technical assessments and the draft Infrastructure Delivery Plan will be available for inspection at www.fylde.gov.uk/localplan/ at Fylde Direct (hard copy) and at libraries (electronically) throughout the Borough for the duration of the consultation. Please visit www.lancashire.gov.uk/libraries/librarydetails for opening hours.

The deadline for consultation responses is **5pm on Thursday 3 December 2015**.

All comments must be submitted in writing and must contain your contact details. Comments cannot be treated as confidential. All comments will be published on our website, although we will not publish any personal details. We will take all comments, the results of the technical assessments and any emerging evidence into account in preparing the next stage of the Local Plan – the Publication version. Greater weight will be given to comments that are supported by evidence.

If you require assistance in formulating and submitting your comments form, or have a query about any aspect of this consultation, please contact the Planning Policy team on 01253 658418 or email planningpolicy@fylde.gov.uk. You can also contact your local ward Councillor for further advice.

Please complete this comments form and return it no later than 5pm on Thursday 3 December 2015. Please note the council cannot guarantee that responses received after the consultation deadline will be considered.

By Email: planningpolicy@fylde.gov.uk

By Post: FREEPOST BJ952
Revised Preferred Option Consultation
Planning Policy
Fylde Council
Town Hall
St Annes
Lancashire
FY8 1LW

Contact Details: Please provide us with your full contact details. We regret that we are unable to process any responses supplied without these details.

	Personal Details	Agent Details
Title:		
First Name:		
Last Name:		
Organisation (where appropriate):		
Address Line 1:		
Line 2:		
Line 3:		
Line 4:		
Post Code:		
Telephone Number:		
E-mail Address:		

(If yes, please tick)

Do you wish to be kept informed of the further stages of the Fylde Local Plan and be involved in future planning policy consultations?	
--	--

Signature: _____ **Date:** _____

Data Protection

Your personal contact details will not be released to any third parties and will only be used for the purposes of the Fylde Local Plan. Please note that your name, comments, and your town/city will be made publicly available. In order to comply with data protection legislation, address details and email addresses will not be released.

If you want this information in large print, audio, Braille or another language please call 01253 658658

Appendix 8

Revised Preferred Option 2015: Consultation Responses



**Fylde Local Plan to 2032:
Revised Preferred Option consultation**

RESPONSES REPORT

March 2016

Summary of comments received and the Council response

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

The textual changes throughout the responses report are expressed in the conventional form of ~~strike through~~ for deletions and underlining for new text.

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Preface**Preface****Number of representations:**

Comment	Support	Object	Total
0	0	0	0

No representations were received to the Preface

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

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

particular format because all representations will be submitted with the Local Plan for Examination by a Planning Inspector.

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

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

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

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

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

Where the document is available

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

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

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

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

Chapter 1: Introduction**Chapter 1: Introduction****Number of representations:**

Comment	Support	Object	Total
35	2	18	55

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

Representations received from:

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

What you said**Paragraph 1.1**

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

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

Paragraph 1.7 - Neighbourhood Development Plans

Natural England commented that since some Neighbourhood Development Plans are being prepared in advance of the Local Plan, it would be helpful to include the following text in the Local Plan: 'Where a Neighbourhood Plan could lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats & Species Regulations (as amended) 2010 (the 'Habitats Regulations') and the Environment Assessment of Plans and Programmes Regulations 2004. In relation to the Habitats Regulations, a Neighbourhood Plan cannot

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

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

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

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

Paragraph 1.8

An Action Group commented that 'new homes, jobs and services are located in the most sustainable locations ...' is an admirable aim, but has not been attempted in the recent past

(e.g. 15/0458 – Land East of Willow Drive, Wrea Green). The Action Group claimed that that application did not consider sustainability properly.

Paragraphs 1.10 – 1.19 – Duty to Co-operate

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

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

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

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

Paragraph 1.24

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

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

Paragraph 1.25

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

Paragraph 1.28

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

Paragraph 1.29

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

Paragraphs 1.31-1.32 - Technical Assessments

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

Paragraph 1.33 - Cross Cutting Themes

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

Paragraph 1.34 - Infrastructure Delivery Plan

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

Paragraphs 1.40 and 1.41 - Mineral Safeguarding Areas

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

LCC commented that there does not appear to be any reference within the plan or any supporting information, to an assessment of the sustainability of development within the MSAs, or to the sustainability of the draft Plan allocating land for housing within an MSA. It

should be noted that, whilst the survey may result in a short delay, the potential for significant delay to the delivery of a scheme will arise if prior extraction is identified as a requirement of the planning permission, and this has not been raised as an issue early in the project's design and inception.

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

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

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

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

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

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

Council response

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

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

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

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

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

The council notes the comment made by an Action Group in relation to paragraph **1.8** about 'new homes, jobs and services are located in the most sustainable locations', and the Group's claim that planning application 15/0458 – Land East of Willow Drive, in Wrea Green was approved contrary to this paragraph. The RPO version of the Local Plan has limited weight at the moment, and it is not currently being used by the Development Management Committee when determining planning applications. Once the draft Local Plan reaches the Publication version in summer 2016, it will have gained more weight and it will constitute a material consideration when determining planning applications. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used regularly in the determination of planning applications across the borough, including Wrea Green.

The council accepts the Home Builders Federation's and three developers recommendation that Fylde Council prepares a draft Statement of Compliance under the Duty to Co-operate, setting out what has occurred to date in terms of joint working on areas of common interest.

The Home Builders Federation's concerns that all three Fylde Coast Authorities are committed to meeting their own housing needs within their own boundaries is noted especially in light of the overall housing to be delivered across the Fylde housing market area and how this aligns with the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs over the period 2015 to 2025 LEP Strategic Economic Plan. The council's response to the Home Builders Federation's concerns that the housing needs figure for Fylde needs to align with the Lancashire Enterprise Partnership (LEP) ambitions to create 50,000 new jobs is set out under policy **H1** (Housing Delivery and the Allocation of Housing Land) in Chapter 10.

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

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

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

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

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

five alternative options from the Issues and Options stage in spatial terms. The same four Strategic Locations for Development have been progressed in the RPO version, too.

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

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

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

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

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

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

Recommendations for change

- Add the following new paragraph after paragraph **1.7** and re-number the subsequent paragraph numbers: ‘Where a Neighbourhood Plan could lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats & Species Regulations (as amended) 2010 (the ‘Habitats Regulations’) and the Environment Assessment of Plans and Programmes Regulations 2004. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if it would result in a likely significant effect on any European Site (see Schedule 2, The Neighbourhood Planning (General) Regulations, amended 2015). Therefore reduction and/or avoidance measures may need to be incorporated into the Neighbourhood Plan to ensure compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the HRA for the Local Plan. In addition to the HRA process, if environmental effects are predicted a SEA screening exercise should also be undertaken. A SEA may be required where:
 - a neighbourhood plan allocates sites for development
 - a neighbourhood plan contains sensitive natural assets that may be affected by the plan
 - a neighbourhood plan may have significant effects that have not already been considered and dealt with in the Sustainability Appraisal for the Local Plan.’
- The council agrees to prepare a draft Statement of Compliance with the Duty to Co-operate. The Statement of Compliance will be issued in draft alongside the Publication version of the Fylde Local Plan, to enable all neighbouring authorities and ‘prescribed’ bodies under Section 33A of the Planning and Compulsory

Purchase Act 2004³² and all other interested parties to comment on this legal requirement through representations.

- Amend existing paragraph **1.40** to read: ‘LCC will be consulted on proposals, including planning applications that are likely to prejudice or prevent the future extraction of the minerals within the MSAs, but Fylde Council will determine the planning applications for residential, retail, and commercial developments and changes of use of the land within the MSAs. Three ~~Four~~ of the strategic sites proposed in chapter 7 have MSAs within their boundaries, to a greater or lesser extent.’

Additional recommendations for change

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

Additional textual changes

- Add a new sub-heading before paragraph **1.7**: ‘Neighbourhood Development Plans’
- Amend the third sentence of paragraph **1.7** to read: ‘The Bryning with Warton Neighbourhood Development Plan is ~~expected to be adopted in 2015~~ being submitted for examination.’
- Amend the second sentence of existing paragraph **1.28** to read: ‘The Plan also identified the distribution ~~and phasing~~ of development over the Plan period to 2032;...’
- Add a new sub-heading: ‘Publication version’
- Add a new paragraph after existing paragraph **1.29** and re-number the subsequent paragraphs: ‘This Publication version forms the final round of consultation, for comments on the soundness of the Local Plan (see paragraph **1.20** above) and should only be subject to minor changes. The Local Plan will then be submitted to the Secretary of State, along with the representations made on the document and an Examination in Public (EiP) will be held. This will give an independent Planning Inspector the opportunity to test the soundness of the document, in terms of the Local Plan’s justification, effectiveness and consistency with national policy. Once the Local Plan is found ‘sound’ by the Planning Inspector it will be adopted by the council as part of the Development Plan for Fylde.’
- Amend existing paragraph **1.32** to read: ‘The results of the previous technical assessments have been used to update and enhance the Local Plan during its

³² As amended by Section 110 of the Localism Act 2011

preparation. The consultants preparing the Sustainability Appraisal report have been working with the Council officers during the preparation of the Local Plan. These assessments have been undertaken throughout the preparation of the Local Plan and the results and recommendations of these 2015 technical assessments have been used to inform this Revised Preferred Option Publication version.' ~~The results from the 2015 technical assessments will be fed into the next version of the Local Plan, which will be the Publication version.'~~

- Delete the sub-heading: '~~The Policies Map~~'
- Delete existing paragraph **1.35** as the Policies Map will accompany the Publication version of the Local Plan: '~~References are made throughout the plan to items being defined, designated or identified on the Policies Map. The Policies Map will be prepared to accompany the next version of the Local Plan – i.e. the Publication version. For the purposes of this Revised Preferred Option version of the Local Plan, proposed development sites are identified on a number of inset maps, which are to be found at the back of this document.~~'
- Amend **Table 1** to include the correct site references: 'HSS1, HSS8 and HSS9'

Chapter 2: Spatial Portrait of Fylde**Chapter 2: Spatial Portrait of Fylde****Number of representations:**

Comment	Support	Object	Total
10	3	26	39

Representations received from:

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

What you said

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

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

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

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

Paragraph 2.2

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

Paragraph 2.7

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

Paragraph 2.9

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

Paragraph 2.11

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

Paragraph 2.15

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

Paragraph 2.23

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

Paragraph 2.24

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

Paragraph 2.36

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

Paragraph 2.37

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

Paragraph 2.38

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

Paragraph 2.42

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

Paragraph 2.43

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

Paragraph 2.45

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

Paragraph 2.47

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

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

Paragraph 2.50

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

Paragraph 2.52

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

Paragraph 2.54

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

Paragraph 2.55

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

Paragraph 2.59

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

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

Paragraph 2.62

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

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

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

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

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

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

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

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

Paragraph 2.63

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

Paragraph 2.65

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

Paragraph 2.66

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

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

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

Paragraph 2.67

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

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

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

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

Figure 3

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

Figure 4

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

Council response

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

The council agrees with the Blackpool, Fylde and Wyre Trades Union Council that the shortage of school places mentioned in paragraph 2.26 should be followed through in paragraph 2.30.

The Trades Union Council's comment on the preference for community schools over academies or free schools is noted.

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

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

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

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

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

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

The council noted the Action Group comment on the omission of the Green in Wrea Green from the list of historic sites in paragraph **2.7**. However, the council does not consider the Green in Wrea Green to be an historic attraction in the same way that Lytham Hall or Lytham Windmill are. The council noted the comments made by an Action Group to paragraph **2.2** regarding the lack of planning applications on Grade 2 or 3a agricultural land, but this is evidenced by the planning register; together with the Action Group's questioning of the population figures in Fylde in paragraph **2.9**, which are based on the 2011 census data. The council also noted the Action Group's comments regarding problems accessing doctors in paragraph **2.11**, which is not considered to constitute 'Deprivation'. The council notes the Action Group's comments regarding the success or otherwise of the Enterprise Zone at BAE Systems in Warton in paragraph **2.15** and **2.45**, which will be monitored over time. The

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

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

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

Recommendations for change

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

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

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

Additional recommendations for change

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

Additional textual changes

- Delete the following words from the last sentence of paragraph **2.22**: '~~...which will accompany the Publication version of the Local Plan.'~~
- Amend the last sentence of paragraph **2.36** to read: '... a proposed Enterprise Zone at Blackpool Airport, which was ratified on 1st April 2016.
- Amend the last sentence of paragraph **2.44** to read: 'Services focused on a local retail centre will be needed for ~~the new community~~ Warton within the lifetime of the Local Plan.'
- Amend the last sentence in paragraph **2.58** to read: '...in line with the council's Regeneration Framework, 2015-2032.'
- Amend paragraph **2.60** to read: 'The rural areas include the **Tier 1: Larger Rural Settlements** of ~~Elswick~~, Newton, Staining and Wrea Green; and **Tier 2: Smaller Rural Settlements** of Clifton, Elswick, Singleton and Weeton. A large proportion of land

within the Borough falls within the rural areas. Land south of Newton and Clifton is in a high flood risk area.'

- Amend the first sentence in paragraph **2.65** to read: 'Public transport provision in the rural areas is ~~poor~~ limited.'

Chapter 3: The Local Plan's Vision for Fylde**Chapter 3: The Local Plan's Vision for Fylde****Number of representations:**

Comment	Support	Object	Total
6	2	5	13

Representations received from:

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

What you said

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

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

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

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

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

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

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

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

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

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

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

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

A resident was glad to see a commitment to more and enhanced cycle ways, but the plan must be more precise as to what a cycleway is. A white line is not a cycleway and the plans must be fit for purpose, meet cycling needs and provide protection for cyclists. Current strategies fail in all of these and this plan must be more than words and generalities and must show a definition of a cycleway.

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

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

Council response

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

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

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

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

County Council is the Mineral and Waste Planning Authority with responsibility for preparing development plans and supplementary planning documents which include shale gas exploration, production and distribution and the impacts upon the environment.

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

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

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

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

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

Recommendations for change

- Amend the Vision to include the following wording: 'and congestion on the A585 trunk road will have been resolved through the delivery of the M55 to Fleetwood Corridor Improvements (formerly known as the Blue Route).'

- Add the following wording to the paragraph in the Vision on the public rights of way network: ‘Additional footpaths, cycleways, bridleways and canal towpaths ...’
- Add the following text after the paragraph on the public rights of way network: ‘The rural character and attractiveness of the countryside areas of the Fylde will have been retained and enhanced and the rural economy will thrive, in particular small and medium sized enterprises.’

Additional recommendations for change

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

Additional textual changes

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

Chapter 4: The Strategic Objectives for Fylde**Chapter 4: The Strategic Objectives for Fylde**

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

Representations received from:

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

What you said

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

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

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

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

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

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

Strategic Objective 1: To create sustainable communities

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

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

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

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

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

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

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

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

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

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

Strategic Objective 3: To make services accessible

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

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

An Action Group objected claiming that Strategic Objective 3(1) is not being applied now in Wrea Green and it is too late to attempt to do so; Strategic Objective 3(2) recent approvals in Wrea Green, so far from the centre, will increase this issue – it was said in objections and duly ignored; Strategic Objective 3(3) what about Kirkham and Wesham Railway Station; Strategic Objective 3(4) what further can be done; Strategic Objective 3(5) surely this from the M55 to Heyhouses has already been secured as part of the appeal approval at Queensway; and Strategic Objective 3(6) the A585 comes through Wesham and Kirkham to the A583 – how are

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

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

Strategic Objective 4: To diversify and grow the local economy

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

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

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

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

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

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

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

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

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

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

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

Council response

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Recommendations for change

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

quality of the openness of the Green Belt ~~will be maintained~~ and Areas of Separation will be maintained.

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

Additional recommendations for change

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

Additional textual changes

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

Chapter 5: National and Sub Regional Policy

Policy NP1: Presumption in favour of sustainable development

Number of representations:

Comment	Support	Object	Total
1	1	1	3

Representations received from:

- Highways England
- 1 Action Group
- 1 Developer

What you said

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

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

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

Council response

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

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

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

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

Chapter 6: The Development Strategy**Chapter 6: General Comments****Number of representations:**

Comment	Support	Object	Total
3	5	13	21

Representations received from:

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

What you saidParagraph 6.3

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

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

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

Paragraph 6.5

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

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

Paragraph 6.6

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

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

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

Paragraph 6.7

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

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

Paragraph 6.8

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

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

Cross Cutting Themes in Chapter 6

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

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

Council response

Paragraph 6.3

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

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

Paragraph 6.5

The council notes an objection from an Action Group regarding existing planning approvals for new homes on non-sustainable sites in Wrea Green. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green,

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

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

Paragraph 6.6

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

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

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

Paragraph 6.7

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

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

Paragraph 6.8

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

Cross Cutting Themes in Chapter 6

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

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

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

Policy S1: The Proposed Settlement Hierarchy

Number of representations:			
Comment	Support	Object	Total
7	5	5	17

Comment	Support	Object	Total
7	5	5	17

Representations received from:

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

What you said

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

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

Bryning with Warton Parish Council commented on the wording in policy S1: 'Warton will have improved services including shops and community facilities when development set out in the Warton Strategic Location for Development has taken place.' All of the extensive residential development for Warton outlined in the plan, to 2032, has now been approved, additional housing to that proposed is already exceeding the outlined figures. Yet there has been no improvement, or proposals for such, for additional supporting retail services, other than approval of the extension of the convenience store at Townsends garage planning application, likewise any community facilities and it is hard to envisage these changes within the time frame especially without the proactive and energetic support from the Borough, immediately, to drive these improved services forward.

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

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

A landowner supported the inclusion of Elswick as a Tier 1: Larger Rural Settlement in the proposed Settlement Hierarchy is supported. Elswick is a sustainable village and a suitable location for growth, providing a number of essential local community services and facilities including a church, village hall, equipped play and outdoor sports area, convenience store and post office, 2 public houses, café, fish and chip shop, estate agency and children's nursery. There are regular bus services in the village connecting it to Blackpool and St Annes. It is a popular village and an attractive residential area. This is evident in the recent interest in the village by Story Homes on land at Mill Lane.

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

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

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

A developer supported policy S1 which proposes to categorise of Kirkham as a 'Key Service Centre' along with Lytham (including Ansdell) and St Annes. Over the Plan period the role of the Key Service Centres will be to provide a range of housing and employment opportunities, as well as retail and other services to serve the towns and wider catchment area. As the site at Kirkham Triangle is located within one of the three Key Service Centres, its residential development will wholeheartedly comply with the objectives of the RPO.

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

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

A developer objected to Warton being within the settlement hierarchy category of 'Local Service Centres' and claimed that Warton should be included within the 'Key Service Centres' category. As currently drafted the settlement hierarchy is unsound. Warton should be reclassified as it is a 'significant settlement' (paragraph 2.3) and is the location of the 'internationally and nationally significant Lancashire Enterprise Zone at BAE Systems' (paragraph 2.43). This designation will enable the creation of 'net additional employment opportunities' (paragraph 2.45) over and above the significant existing employment at Warton, which the plan confirms suffers from 'high levels of commuting to the BAE Systems site' (paragraph 2.44). The plan seeks to 'provide for an adequate supply of market and affordable housing' to meet locally arising needs and the forecast requirements the increased employment will create (paragraph 2.47). 'Strategic Development' is envisaged as part of the plan strategy for Warton. There is a plan objective to create a new shopping and neighbourhood centre for the settlement (policy EC4). All of these matters create an important role for Warton as a significant settlement in Fylde over the plan period, and this should be reflected in the settlement hierarchy set out in the plan.

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

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

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

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

Council response

The council notes Highways England's support for the approach taken in policy S1 (The Proposed Settlement Hierarchy), which was a new policy in the RPO version of the Local Plan. The council also notes Highways England's comment that the location of some settlements in relation to the Strategic Road Network could inevitably be problematic depending on the level of development focussed in those settlements and the implications for supporting transport infrastructure. Highways England's comments on individual sites will be presented and addressed under policies SL1 to SL4 in Chapter 7.

The council notes Wyre Borough Council's comments that development in Elswick and Singleton, located close to the local authority boundary may have implications in particular

infrastructure provision; and that the main rural settlement in Wyre that may be affected is Great Eccleston. The scale of development in Elswick is dealt with under paragraphs **7.77** and **7.86** in Chapter 7. Paragraph **7.82** says that: 'A site has been allocated for 15 homes in Singleton. Fylde Council is minded to approve the planning application.'

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

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

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

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

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

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

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

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

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

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

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

Recommendations for change

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

Additional recommendations for change

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

Additional textual changes

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

Policy DLF1: Development Locations for Fylde**Number of representations:**

Comment	Support	Object	Total
20	1	20	41

Representations received from:

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

What you said

The Home Builders Federation did not wish to comment upon the relative merits of the Strategic Locations for Development. It is, however, important that realistic assumptions are made regarding delivery rates and lead-in times for these sites. These should be assessed through discussions with developer interests for the various sites. A greater promotion of other sites and locations may also be necessary to ensure that the housing requirement is delivered and to provide flexibility.

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

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

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

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

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

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

A landowner supported the identification of Warton as a Strategic Location for Development. However, the landowner considered that further sites should be identified within it, in order to ensure that both infrastructure can be delivered and has capacity to accommodate

identified growth, and additionally that there is some confidence that both the housing need and employment requirements can be delivered through the Local Plan within the Borough.

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

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

*A landowner supported the identification and inclusion of the Fylde-Blackpool Periphery as one of the four proposed Strategic Locations for Development in the Local Plan, and the proposed spatial framework for the distribution of development across the Borough between the Strategic and Non-Strategic Development Locations. The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing needs in Fylde and development must therefore take place on suitable greenfield sites in sustainable locations. As an identified sustainable Local Service Centre, the Landowners support additional greenfield development at Whitehills as a recognised focus for development within the Fylde-Blackpool Periphery Strategic Location for Development. The Landowners do not support the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period and consider this figure should be increased (see comments in relation to policy **H1**).*

A landowner commented that the SHLAA 2015 update states that there is insufficient land within existing settlement boundaries to meet the housing needs of the Borough. Sustainable development on the edge of existing settlements is supported in order to meet the council's

objectively assessed housing need. Whilst the general distribution of housing across the Borough is supported, it is considered that the proposed minimum housing requirement is too low at 7,700 homes. As a Tier 1: Larger Rural Settlement additional greenfield development in Elswick is supported by the landowner. The landowner claims that Elswick is a settlement that can accommodate an appropriate level of additional growth in order to help to support local services and facilities. Consideration should be given to the allocation of land for housing in Elswick.

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

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

A landowner supported the proposed general distribution of new housing across the Borough, but considered the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period is too low and should be increased. The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing needs in Fylde, and sustainable development must therefore take place on suitable greenfield sites on the edge of existing settlements. As a Tier 1: Larger Rural Settlement, additional greenfield development at Newton is therefore supported. Newton is a sustainable settlement that can accommodate appropriate additional growth and the development of further housing will help to sustain and foster local community services and village facilities.

*A developer supported the proposed general distribution of new housing across the Borough but objects to the proposed minimum housing requirement of 7,700 new homes to be delivered in the plan period and considers this figure should be increased (see comments in relation to policy **H1**). The updated Local Plan evidence base makes clear there is insufficient land available within existing settlement boundaries to meet objectively assessed housing*

needs in Fylde, and sustainable development must therefore take place on suitable greenfield sites on the edge of existing settlements. As a Tier 1: Larger Rural Settlement, additional greenfield development should therefore be permitted at Staining. Staining is a sustainable settlement that can accommodate appropriate additional growth and the development of further housing will help to sustain and foster local community services and village facilities. The developer therefore objects to the proposed wording under the sub-heading of Non-Strategic Locations set out in the policy text and requests that this is revised to acknowledge Staining as a Tier 1: Larger Rural Settlement where non-strategic development can take place on the edge of the settlement. The proposed policy wording should state: 'Non-strategic development sites (amounting to between 10 and 99 homes) are situated within the four Strategic Locations for Development. Non-strategic development sites also occur within and on the edge of the Tier 1: Larger Rural Settlements at Elswick, Newton and Staining and the Tier 2: Smaller Rural Settlement at Clifton'.

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

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

Two developers strongly objected to the proposed housing requirement and distribution strategy set out in this Revised Preferred Option. Firstly, it is considered that the plan has underestimated the total annual housing requirement within Fylde by approximately 20% and that a figure of 440 to 450 homes per annum would be required to meet Fylde's economic growth aspirations and affordable housing obligations, as recommended in the 2014 SHMA Addendum 2. This has major implications on the distribution strategy within the plan, and indicates that the plan would need to identify a total supply of between 11,088 and 11,340 homes to be able to deliver this requirement with a suitable buffer for non-delivery, which represents an increase of up to 3,150 homes (38%) from the current identified supply. Much of this additional housing will need to be accommodated within the four Strategic Locations for Development, with particular pressure on Warton, given constraints elsewhere and evidence from an earlier version of the Local Plan confirming that Warton is a sustainable location that could support 1,160 homes. Accommodating this 1,160 figure would require an

uplift of 510 from the 650 homes currently proposed in Warton, which is not considered unreasonable, as it equates to just 16% of the 3,150 additional homes required.

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

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

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

A resident objected to the minimum housing figure (7700) and the employment land requirement (59.1Ha), which the resident claims are both deeply flawed. In the case of the former, the resident claims the council has failed to give the necessary weight and consideration to all the available evidence on the real housing requirement in the Fylde as evidenced by the present and past record of housing completions and the exceptional number of outstanding permissions. In the case of the building land, the resident claims the council continues to misunderstand the business trends in the Borough and the evidence of its own figures which show that employment land use in Fylde has been in long term decline as a result of a change of industries and the impact of technology. There is a requirement for a relatively small amount of employment land to recognise a change in location of business in the Borough (less than a third of the amount quoted in this section and already assigned under existing developments).

A resident objected to the housing numbers which they considered were far too high and should be reduced, there is no proven need and as the figure is so high it will never be possible to achieve a five year housing supply number. Previously developed land and surplus employment land should be used for housing development not open countryside and there is enough of this type of land available. The housing figure is based on an aspiration which sees a huge increase in future employment which the resident considers is excessively optimistic. The resident is dissatisfied with the underlying data and processes used by Fylde to

determine the housing figure claiming that the calculations are based on obsolete and flawed data, Fylde should produce its own housing requirement numbers based on historical fact. The resident also believes that housing need figures are massively overstated. Consultants have admitted that their findings had been a benchmarking exercise to compare Fylde with other Authorities so standard models had been used by them and the real need for affordable housing was a tenth of the 420 stated therefore 42 p.a. not 420.

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

Paragraph 6.13

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

Paragraph 6.14

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

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

Paragraph 6.15

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

Paragraph 6.16

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

Paragraph 6.18

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

Paragraph 6.19

BAE Systems Real Estate Solutions commented that the paragraph refers to the provision of a local retail centre being developed within Warton on previously developed land owned by BAE Systems on Lytham Road. There is land on the BAE Systems Warton Aerodrome site that has been unused for some years and that is currently surplus to operational requirements that is located adjacent to Lytham Road. This land, along with the whole of the Aerodrome site, is designated within the Lancashire Enterprise Zone where land is to be used primarily to promote advanced manufacturing and engineering (AEM). Any change to development of this land other than as an Enterprise Zone would need to be agreed with key stakeholders including the Department for Communities and Local Government, Lancashire County Council and the Local Enterprise Partnership (LEP). The priority for development within the Enterprise Zone is for AEM use which is supported by the policy EC2. Any aspiration for other uses on land within the Enterprise Zone will need to be considered by the LEP and only allowed following a strategic decision by the LEP to allow more than AEM use on the Enterprise Zone. BAE Systems Real Estate Solutions considered that the end of the last sentence to the paragraph would be better worded as '... it will become a more sustainable location for new development over the lifetime of the Local Plan...'

Paragraph 6.21 and Table 2 – **Distribution of Development to 2032**

Treales, Roseacre and Wharles Parish Council commented on paragraph 6.21 that the land released for new business ventures at Local Enterprise Zone sites at Warton and Blackpool should be identified as additional employment land. This is because new activities and new initiatives will be required to attract new employment and organisations to these locations. Alternatively, the total area occupied by BAE Systems and the LEZ and The Blackpool Airport site and its environs could be listed. In that way the total strategic opportunity for employment

could be shown. Similarly the prospective or actual change in employment by the BAE Systems and Balfour Beatty should be addressed directly within the context of the strategies of these organisations and how FBC can engage with each to encourage them to retain and grow their employment activities in a sustainable way.

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

A landowner commented that Wild Lane and Peel Road landowners support the proposed distribution of 80% of the proposed requirement to the four Strategic Locations for Development and the sub-distribution between them, in favour of development at the Fylde-Blackpool Periphery Strategic Location for Development. It is inevitable that delivery from some existing commitments and/or proposed allocations will not come forward or will be delayed, and relying on unallocated small sites and an anticipated windfall allowance for contingency within the proposed housing supply will simply add to the risk of under-delivery. On the basis that the housing requirement should be a minimum to confirm to the Framework requirement of significantly boosting supply, additional positive and plan-led housing allocations or an Additional Strategic Site should therefore be identified to provide greater contingency and flexibility. The SHLAA and 2015 Call for Strategic Sites demonstrate there is capacity to increase the amount of development that can be successfully accommodated at the Fylde-Blackpool Periphery Strategic Location for Development on land between Wild Lane and Peel Road, and this should be reflected in the proposed distribution set out in **Table 2** and the allocation of land in policy **SL2**.

A landowner objected considering that given the inadequate minimum housing delivery target identified under policy **DLF1**, the housing target and number of allocated sites assigned to Strategic Location 4: Kirkham and Wesham should be increased to make provision for the

necessary additional housing land required. The Mill Farm Sports Village Development, together with the enhancements to the railway station have significantly improved the sustainability and accessibility of Kirkham and Wesham. Furthermore, paragraph 2.3 of the RPO acknowledges that Kirkham and Wesham is the only sizeable inland settlement in the borough. Kirkham and Wesham is therefore clearly a location which could accommodate further growth in a sustainable manner.

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

*A landowner considered that Wrea Green should be identified as a 'Non-Strategic Location' that is capable of accommodating a specific residential allocation on their landholdings for up to 50 homes. This would help to meet the 9% or 711 homes required from 'Non-Strategic Location' sites. The landowner considers that the distribution proposed relies too heavily on the Strategic Locations (policies **SL1-4** inclusive) and that further flexibility is required and that policy wording is required in policy DF1 to reflect this fact and reflect this matter in **Table 2**.*

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

*A developer objected to **Table 2** of the RPO Document, which sets out the Council's proposed distribution of development. It is anticipated the four Strategic Locations will deliver 80% of the Council's total housing requirement. However, there does not appear to be any contingency or policy mechanism in place through which the Council can respond to a shortfall in housing delivery should any of the four Strategic Locations fail to come forward, or the*

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

*A developer considered that the proposed distribution of 20% of the housing requirement between Non-Strategic Locations for Development (9%) and Allowances and Unallocated Sites (11%), was flawed. It is inevitable that delivery from some existing commitments and/or proposed allocations will not come forward or will be delayed, and relying on unallocated small sites and an anticipated windfall allowance for contingency within the proposed housing supply will simply add to the risk of under-delivery. On the basis that the housing requirement should be a minimum to confirm to the Framework requirement of significantly boosting supply, additional positive and plan-led housing allocations should therefore be identified to provide greater contingency and flexibility. The SHLAA and 2015 Call for Non-Strategic Sites demonstrate there is capacity to increase the amount of development that can be successfully accommodated at Non-Strategic Locations for Development, and particularly at the sustainable Tier 1: Larger Rural Settlements, and this should be reflected in the proposed distribution set out in **Table 2** and the allocation of land in **Table 3** (in Chapter 7).*

*A developer commented on **Table 2** which identifies 11% (937 homes) of the total housing requirement which is to be met through 'allowances and unallocated sites'. However, it is unclear whether this is a windfall allowance, as paragraph **10.22** suggests a windfall allowance of 680 homes. **Table 2** therefore needs to provide greater clarity upon what is meant by 'allowances and unallocated sites'. Paragraph 48 of the Framework states: 'Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply...' The proposed rates of delivery equate*

to approximately 45dpa from windfalls. This is in excess of the allowance suggested within the Council's Strategic Housing Land Availability Assessment (SHLAA), published in October 2012. Whilst it is recognised this study is now out of date, it identified a windfall allowance of 14dpa, even if all conversions are included this only rises to 35dpa. It is also noted that the previous Preferred Option identified a windfall allowance of 30dpa. Failure to deliver against windfall targets will detrimentally impact upon the delivery of the plan and the demonstration of a five year supply of housing land. It is therefore recommended that a cautious approach is adopted and the use of windfall allowance is not used as a mechanism to reduce the numbers of sites allocated within the plan.

A developer welcomed the fact that the proportion of windfall and smaller/ non-strategic sites has reduced from 31% to 20% of the total supply, as this introduces more certainty into the process, with less reliance on unplanned development. That said, **Table 2** still identifies 11% (937 homes/ 45 dpa) as coming through 'allowances and unallocated sites'. The breakdown of this figure is set out within the trajectory at **Appendix 2** of the RPO. That said this breakdown is not made clear within the text, as neither the policies or supporting text to **DLF1** or **H1** refer to **Appendix 2**, and paragraph **10.22** actually offers a contradictory figure suggesting a windfall allowance of 680 homes (32 dpa), therefore we would ask for greater clarity on this matter. Paragraph 48 of the Framework does permit an allowance for windfalls: 'if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply'. The proposed windfall delivery rate of 40 dpa from year 10 onwards does reflect the quoted level of windfall since 2011, with residual completions and committed small sites expected within years 1-9 averaging over 45 dpa, although it is unclear exactly where these sites have come from as the SHLAA has not been updated since 2012. Therefore, there is some evidence of past windfall and we welcome the fact that the proposed allowance is only applied from year 10 onwards as this removes any double counting. However, there is no compelling evidence that this past rate of windfall will continue through the plan period. Firstly, the current windfall total includes 51 homes that are 'minded to approve', meaning they are not yet committed, and also includes an elevated delivery rate of 59 dpa in years 5-9 which is not evidenced, and is significantly higher than the projected delivery rates set out within the 2012 SHLAA (which set a rate of 14 dpa, rising to 35 if conversions are included) and within the 2013 Preferred Options (which set a rate 30 dpa). Secondly, windfall rates should fall as a new plan progresses to adoption as more sites are allocated or picked up through the SHLAA process. In this case, given the limitations of the previous Local Plan, which was adopted in October 2005 with an extremely restrictive approach to housing, comprising a residual requirement of just 1 home between 2005 and 2016, it is entirely reasonable to assume that the vast majority of the Council's housing supply in recent years has been through windfall development. As such, development opportunities of this scale and nature will have been partly exhausted over the last 4 years and there is no evidence to indicate that windfall development could continue at the same rate and scale. Failure to deliver against windfall targets will hinder delivery of the plan and the ability to demonstrate a 5 year housing land supply, which Fylde have struggled to do in recent years anyway. It is recommended that the windfall allowance is not used as a mechanism to reduce the number of allocated sites, and could instead be used to provide the buffer (see paragraph 5.20), as recommended in the Inspector's report on the Selby Core Strategy. It's equally important that the delivery of windfall sites is closely monitored through the AMR process. Failure to achieve the windfall assumptions will require the Council to

consider releasing other sites, or review its plan, to ensure a 5 year housing supply and that the full housing requirements of the plan are met.

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

Council response

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

The council notes LCC's support for the rationale of delivering housing through strategic locations, but disagrees with LCC's claim that there is potential for a greater proportion of housing growth to take place in the Kirkham area. Kirkham is identified as a Strategic Location for Development and 14% of the development proposed by the Local Plan is at Kirkham. This is considered a sustainable amount of development for this Key Service Centre. The majority of development is directed to the Strategic Location for Development at Lytham and St Annes (25%) and Fylde-Blackpool Periphery (33%), this is the council's Revised Preferred Option.

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

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

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

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

The council notes a landowner's support for the identification of Warton as a Strategic Location for Development, but also the landowner's request for the identification of additional sites within the Strategic Location, to ensure a critical mass is achieved to ensure

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

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

The council notes a landowner's request that Wrea Green should be identified in policy **DLF1** as a 'Non-Strategic Location' that is capable of accommodating up to 50 homes. The council disagrees with the landowner that the distribution proposed relies too heavily on the Strategic Locations for Development, or that further flexibility is required. The council considers that Wrea Green has delivered sufficient new homes – 150 homes - granted since the start of the plan period from 1st April 2011, and there is therefore no need for the allocation of land for additional homes within the plan period.

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

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

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

The council notes a landowner's and a developer's request that development levels should be increased to allow flexibility for sites in suitable and sustainable locations outside the Strategic Locations for Development in Tier 1: Larger Tier Rural Settlements such as Staining. The council's development strategy focusses development in the four Strategic Locations for Development and limits further development in Tier 1 and Tier 2: Rural Settlements, due to the lack of services and facilities in those settlements. Development needs to be focussed in and around the existing urban centres to ensure a critical mass is achieved in terms of infrastructure delivery – and concentrating development at the four Strategic Locations for Development will achieve this. In addition, planning permission has been granted for 113

homes in Staining. There is also an allocation for 28 homes (paragraph **7.79**). Consequently, the council considers that no further housing allocations need to be made in Staining and it does not need to be referred to under the 'Non-strategic locations' in policy **DLF1**.

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

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

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

The council notes two residents objections to the housing figure and the employment land figures referenced in the plan. The council's response to the representations received on the housing requirement figure is dealt with in policy **H1** in Chapter 10 and the employment land figure is considered under policy **EC1** in Chapter 9.

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

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

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

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

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

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

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

The council notes Treales, Roseacre and Wharles Parish Council's comment on **Table 2** that the land released for new business ventures at Local Enterprise Zone sites at Warton and Blackpool should be identified as additional employment land. All of the responses to the employment land figures, including the Enterprise Zones at BAE Systems, Warton and Blackpool Airport are dealt with in Chapter 9.

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

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

The council notes a developer's objection to **Table 2** claiming that the majority of new housing should be directed towards Lytham and St Annes compared to the Fylde-Blackpool Periphery. Lytham and St Annes are constrained by the coastline, Green Belt and areas at risk of flooding. The council considers that there is an opportunity to create a new sustainable community at the Fylde-Blackpool Periphery Strategic Location for Development and that this area should

take 33% of the development compared to 25% in Lytham and St Annes and not the other way around.

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

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

Recommendations for change

- Delete 'Elswick' from the list of **Tier 1: Larger Rural Settlements** in policy **DLF1** and add 'Elswick' to the list of **Tier 2: Smaller Rural Settlements**.
- Amend the reference from **7,700** to **7,770** new homes in policy **DLF1** and throughout the document.
- Amend the last sentence of paragraph **6.19** to read: '... it will become a more sustainable location for new development over the lifetime of the Local Plan.'
- Amend **Table 2: Distribution of Development to 2032** taking account of the reduced number of homes in Elswick from 140 homes down to 50 homes and the additional homes for Warton following the Inspector's decision allowing the appeal at Blackfield End Farm.
- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate the level of development identified in the RPO version of the Local Plan.
- Redraft policy **SL3** in Chapter 7 by listing all existing commitments in Warton in the policy.

Additional recommendations for change

The following additional changes are proposed to update the text to ensure that the Settlement Hierarchy in policies **DLF1** and **S1** are amended – in accordance with the recommendations in the Settlement Hierarchy Background Paper, i.e. that Elswick should be

a **Tier 2: Smaller Rural Settlement**. All recent planning decisions need to be taken on board in Chapter 6 and will appear in the Publication version of the Local Plan.

Additional textual changes

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

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

Chapter 7: General Comments

Number of representations:

Comment	Support	Object	Total
0	0	4	4

Representations received from:

- Natural England
- 1 Action Group

What you said

Paragraph 7.2

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

Paragraphs 7.1, 7.2 and 7.3

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

Council response

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

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

Recommendations for change

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

Policy M1: Masterplanning the Strategic Locations for Development
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Number of representations:			
Comment	Support	Object	Total
5	1	7	13

Comment	Support	Object	Total
5	1	7	13

Representations received from:

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

What you said

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

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

*The Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs. However, new housing will bring a need for schools in other areas as well and this is acknowledged in criterion g) of policy **M1**. The Fylde has a stable education system with a family of schools co-operating well together. The planning of new*

schools will need great care so that this balance is not upset and that the new schools open and expand at exactly the right times as the population grows. The new schools should certainly be community schools under democratic control and not academies or free schools, or that balance will definitely be upset, as well as bringing to the Fylde all the disadvantages of those types of school when these have been avoided in the Fylde so far.

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

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

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

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

timescales envisaged in the Strategic Location Policies, rather than delivery being delayed by the preparation of masterplans. This is particularly pertinent with regards to the delivery of housing over the Plan period, especially at a time when the council admits that it cannot demonstrate a five year supply of housing land.

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

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

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

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

Paragraph 7.7

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

Paragraph 7.9

A resident claimed that an appeal inspector said up to 100 homes in total were sustainable in Wrea Green, but this was ignored by the Development Management Committee, so the resident questioned how any reliance could be placed on the evaluation of sustainability in the future.

Paragraph 7.11

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

Paragraph 7.12

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

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

Council response

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

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

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

The council notes a landowner's objection to criterion b) of policy M1 claiming that the requirement for a broad balance and range of housing choice in line with the Fylde Coast SHMA, 2014, would result in a significant proportion of 1 and 2 bedroom properties, which

the landowner claimed could make development unviable and commercially unrealistic. The council considers that the mix required in all new residential developments should be in accordance with the most up-to-date SHMA, in line with criterion b) of policy **M1**. In addition, the council notes the landowner's objection to criterion j) of policy **M1** which stipulates that housing must be located within a maximum walking distance of 400 metres of a bus stop. The maximum walking distance 400 metres of a bus stop is a standard measurement used in sustainability appraisals.

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

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

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

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

The council notes the Action Group's objection that none of the criteria in policy **M1** were implemented prior to or as part of the approval of planning permission (15/0458) in Wrea Green (paragraph **7.7**). The Action Group also go on to claim that an appeal inspector said up to 100 homes in total were sustainable in Wrea Green, in relation to sustainable greenfield sites referred to in paragraph **7.9**. The Action Group also objected to paragraph **7.11** which deals with infrastructure because planning application 15/0458 was granted in Wrea Green without any improvement in the infrastructure. The Action Group appears to be focussing on planning applications for residential developments in and around Wrea Green, which already have the benefit of planning permission or were allowed on appeal. The draft Local Plan, which is currently at RPO stage, will eventually replace the adopted Fylde Borough Local Plan (As Altered), October 2005, and will be used in the determination of planning applications across the borough, including at Wrea Green.

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

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

Recommendations for change

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

Additional recommendations for change

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

Additional textual changes

- Amend the second paragraph of policy **M1** to read: 'The masterplans should include a ~~phasing plan, together with~~ an agreed programme of implementation in accordance with the masterplan and an approved design code'
- Amend criterion i) of policy **M1** to read: 'Access to well-designed, separate but overlooked cycleways (both on-road and off-road), walking routes and bridleways serving the local facilities and linking to services and amenities. Opportunities should be sought for the development of a network of walking, cycling and bridleway routes;'
- Add a new criterion i) to policy **M1** and re-number the subsequent criteria accordingly: 'Energy efficiency measures should be incorporated into new developments;'
- Amend criterion j) of policy **M1** to read: 'Housing, employment, retail and leisure facilities located within a maximum walking distance of 400 metres of a frequent, viable and accessible bus service;'
- Amend criterion k) of policy **M1** to read: 'Secured Safety by ~~De~~ Design principles should apply in new developments;'
- Amend criterion n) of policy **M1** to read: 'A network of green spaces, including formal and informal recreation areas and amenity open spaces where people can congregate,

linking the area to the wider Green Infrastructure network that provides for large scale landscape enhancement; together with the provision of advanced landscape planting;'

- Amend criterion o) of policy **M1** to read: 'The conservation and enhancement of important environmental assets and natural resources, biodiversity (nature conservation) and, ecological networks ~~and formal and informal recreation areas~~ Ecological connectivity within the site and with the surroundings should be maintained and enhanced through appropriate site layout; the retention of existing important features including trees, woods and water bodies and their integration within a well-designed landscape with appropriate habitat protection;
- Amend criterion q) of policy **M1** to read: 'To confirm the presence or otherwise of ~~sites of national importance or local~~ sub-surface archaeology, more detailed archaeological studies should be undertaken, prior to development;'
- Amend the penultimate sentence in paragraph **7.4** to read: 'a viability assessment and a ~~phasing and~~ delivery strategy.'

Policy SL1: Lytham and St Annes Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
9	0	6	15

Representations received from:

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

What you said

A landowner objected to the omission from the Plan of land adjacent to The Lowlands at the corner of Division Lane and Queensway, St Annes. A number of applications have been made for development on this site, which is located in the Green Belt. The landowner requested that the site be removed from the Green Belt. This area has been in and out of Green Belt over the years. If this application had come before the planning committee in the early 80's, there would have been no Green Belt condition. Would it create a precedent? The site just finishes

off that side of Division Lane, which already consists of single detached homes. It will clean up this derelict area and certainly improve the Gateway to St. Annes. The actual land on the boundary with Queensway is owned by Lancashire County Council, so any development would be buffered by this strip of land. Development of this site would clear up an area subject to fly tipping. The area has permitted agricultural uses - the approval for a pig farm over a residential development, given this gateway location, would not seem appropriate. The original development intention, back in 1957, for this site was for a detached home as per the covenant placed by Guardian Royal. With regard to environmental impact, clearly a residential development has the least impact on the environment and would complete this area once and for all. This end of Division Lane is not one of the most attractive in Fylde Borough.

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

*A landowner endorsed and supported the allocation of the Queensway site **HSS1**, but it should also include former Valentines Kennels, Wildings Lane, Lytham, which lies outside but adjacent to allocation site **HSS1**. It is noted that the site was included within the draft allocation as presented to the Development Control Management meeting on the 16 September 2015 but it was rejected by members for inclusion in the Consultation version of the RPO document. The committee meeting minutes record: Revised Preferred Option Version of the Fylde Local Plan to 2032, by way of introduction, the Chairman, Councillor Trevor Fiddler made reference to two sites (Valentine's Kennels and land east of Wildings Lane, St Annes) that had been proposed for inclusion for housing by officers in the Revised Preferred Options Document. He went on to say that the council had previously accepted their deletion when it agreed the draft version of the Revised Preferred Option at the Development Management Committee on 16th June 2015 and sought the committee's agreement that these two areas of land should not be included in the Revised Preferred Option Local Plan to 2032. Accordingly the Committee resolved that the proposed site allocations at Valentine's Kennels and land east of Wildings Lane be deleted from the Revised Preferred Options Document. It is considered that this exclusion is inappropriate and that as suggested by officers, the site should be included within the allocation. Accordingly the text in policy **SL1** should be altered to include reference to the site at **HSS1**: '**HSS1** – homes to be completed during the Plan period 1,200' and the text in paragraphs **7.14** to **7.20** inclusive should be updated to reflect this. The landowner confirmed that the site is available, suitable and achievable, i.e. is deliverable and can come forward now with first completions in 2016. The site was promoted to the council's Call for Non-strategic Development Sites in February 2015 and is currently the subject of an outline planning application for residential development of up to 53 homes (application ref: 14/0580). The application is currently pending determination and will be presented to Development Management committee with a recommendation for approval on Wednesday 9th December 2015. Copies of the committee report, the site location plan and illustrative layout plan were submitted by the landowner.*

*A landowner objected to the optimistic delivery rates assumed at the Queensway development in Lytham and St Annes (policy **SL1**) which is expected to deliver 1,150 homes between 2015 and 2032, equating to 68 a year, a delivery rate which is likely to rise given that there have*

been no completions to date on the site. Furthermore, whilst the outline consent granted 1,150 homes, the only Reserved Matters scheme to currently have consent (Ref: 13/0257) is for 110 homes, which is just 10% of this total. It is also understood that there is some uncertainty around the future of the developer due to a recent bereavement. On this basis we also object to the level of proposed delivery at this site.

*A landowner submitted a representation relating mainly to two sites which were previously allocated in the Fylde Local Plan to 2030 (Part 1): **Preferred Options sites as H2** (Land West of North House Lane) and **H3** (Land North of Moss Hall Lane), but have now been deleted from the Revised Preferred Options. For ease of reference, the sites will be referred to as **H2** and **H3** throughout this representation. A landowner objected to the omission of sites **H2** and **H3** from the RPO version of the Local Plan. Despite being designated as a Biological Heritage Site and being excluded from the site allocations in the Revised Preferred Options (LSA map 2 of 4), an outline planning application (14/0580) for up to 53No homes on part of site **H2** has recently been recommended for approval by Officers of Fylde Borough Council and will be presented at Development Management Committee on the 9th December 2015. In summary, the Committee report provides that the proposed housing scheme would represent sustainable development, despite the loss of the Biological Heritage Site due to its designation no longer being applicable. This development would complement the approved Queensway scheme and demonstrates that a clear precedent has been set for new residential development in this area, even where Biological Heritage Site status applies. The council's Strategic Housing Land Availability Assessment 2015 (update) demonstrates that there is not enough land within the defined settlements (as defined in the Fylde Borough Local Plan October 2005) to meet Fylde's housing requirement and that some sustainable greenfield sites on the edge of settlements will need to be allocated for housing. Despite the designation of sites **H2** and **H3** (designations from the Preferred Option version of the Local Plan) as part of the wider Lytham Moss Biological Heritage Site, recent surveys undertaken by various qualified ecologists provide evidence that these sites are not used by wintering birds, namely Pink Footed Geese, Whooper Swans and Bewick Swans as they have no substantive value as feeding ground for these bird species. The sites are suitable for housing and an appropriate scheme would provide mitigation and biodiversity enhancements, including the option of additional conservation land to secure development on these sites. The allocation of these sites for housing would deliver sustainable development in the strategic location of St Annes and would bring substantial economic, social and environmental benefits. The sites are entirely available and deliverable. Sites **H2** and **H3** have previously been allocated in the Fylde Local Plan to 2030 Part 1: Preferred Options as strategic locations for development. From information provided by LERN (Lancashire County Council) the sites were designated as BHS in 2010 and were therefore already designated when they were allocated in the Preferred Options in 2013. The justification and evidence behind these sites being deleted in the Revised Preferred Options has not been provided by the Local Planning Authority. It is respectfully requested that this information is provided as soon as possible as there has been no change in circumstances to warrant deletion of these sites from the Revised Preferred Options. Accordingly, there are no overriding reasons or material considerations to indicate that sites **H2** and **H3** should be deleted from the Revised Preferred Options and it is therefore respectfully requested that sites **H2** and **H3** are allocated for housing and included in policy **SL1** (Lytham St Annes Strategic Location for Development). It should also be recognised that positive pre-application discussions have been on-going for some time with senior officers of Fylde Borough Council in*

*order to bring forward these sites on a phased basis for residential development and to deliver the key infrastructure that the area needs, including contributions towards the Heyhouses Bypass. Up until the point of the release of the draft Revised Preferred Options document to Development Management Committee in June 2015, the Council were supportive of housing on sites **H2** and **H3** and as such significant resources and money have been invested into these schemes. Sites **H2** and **H3** are immediately adjacent to the settlement boundary of St Annes and also adjacent to the housing commitment **HSS1** Queensway, and the current housing application at Valentines Kennels (part of site **H2**). The sites are well related to the built form of St Annes, and would be seen in this urban context, particularly when the adjacent sites are constructed and the area is more urbanised. Recent discussions have also been held with Lancashire County Council Highway Authority in relation to financial contributions to the funding of the scheme and highways capacity and they are supportive of the development of these sites. Sites **H2** and **H3** would be developed with a master-planned approach (in line with policy M1), taking into account adjacent developments (such as Queensway) and would also support key highways and transport infrastructure, in particular the Heyhouses link road, through significant financial contributions, enabling this to come forward sooner, rather than later. Ultimately, the recommendation is that sites **H2** and **H3** are not included in the Revised Preferred options because the sites have been designated as a Biological Heritage Site (BHS). From information provided by LERN (Lancashire County Council) the sites were designated in 2010 and were therefore already Biological Heritage Sites when they were allocated in the Preferred Options in 2013. The justification and evidence behind these sites being deleted in the Revised Preferred Options has not been provided by the Local Planning Authority.*

*A landowner considered that the proposed site allocation **ES3** Boundary Road, Lytham should be promoted as a mixed use site, to comprise mainly employment uses but together with an element of retail. Any such amendment to this proposed allocation will ensure that both appropriate infrastructure can be delivered and has capacity to accommodate identified growth, whilst also meeting local need and enhancing the local sense of distinctiveness. Land at Boundary Road comprises vacant land, approximately 0.7 Ha. Surrounding uses comprise mainly retail, commercial and industrial premises, with residential uses further to the west. The site itself is highly accessible by local road links, and is also within 250 metres of bus stops along Lytham Road which offer regular services between Preston and Lytham. The proposed site is therefore considered to be sustainably located. The utilisation of the site for a mix of employment and retail/specialist uses would have a particularly positive impact on the area in terms of meeting the employment development needs of the Borough and this part of the Fylde in particular, as well as helping to achieve sustainable development and contributing to the local economy. What is more, allocating the site for a future mixed use would complement and enhance adjacent, similar uses. Save for the industrial types uses further north along Boundary Road, the wider site largely consists of residential homes. Therefore, proposing an element of retail on the site would benefit local residents' wellbeing and sense of place, indeed supporting paragraphs **9.31** and **9.33** of the RPO, which both support the view that the site should be promoted for a mixed use rather than exclusive employment uses. The potential for the site to deliver employment uses is greatly enhanced with the additional of some other uses which can drive a scheme forward and ensure the delivery of development on this site in the plan period. The provision of modern business premises for the Borough at the right time and in the right place will bolster the employment strategy set out in the RPO, part of this growth for Lytham and provide a popular and attractive business location that would encourage the*

growth of local businesses and attract inward investment to drive the local economy. Furthermore, it is considered that a mixed use development of the land would help to support Warton's status as a strategic location for development. Provision of land at Boundary Road, Lytham for this use will be benefit to local residents and those passing through along Preston Road, will therefore contribute to the local economy and will support the employment and retail aspirations of the plan. It is therefore requested that for the reasons outlined above, that the council consider further flexibility in respect of the site identified and that the allocation be amended in the emerging Local Plan to be allow future potential for a mixed use development.

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

*A developer was concerned with the reliance placed on 10 sites to deliver 80% of the housing requirement for the Borough, particularly the significant reliance placed on sites in Lytham St. Annes and the Fylde-Blackpool Periphery. In Lytham St. Annes, the delivery rates will be slowed due to the infrastructure required to facilitate the development, such as the Heyhouses Link Road. Site **HSS1** – Queensway, is situated to the north of St. Annes, between Heyhouses Way and North House Lane, and Kensington Developments has been granted outline planning permission for residential development of up to 1,050 homes in 29th April 2009. Permission for reserved matters occurred in April 2015 for 110 homes. A further reserved matters application was submitted in June 2015 for 927 homes. The application is still pending a decision. The Housing Trajectory in **Appendix 2** of the RPO documents states the site will deliver 60-75 homes per annum between 2016 and 2032. The Plan is unclear what assumptions are being applied by the Council relating to the delivery rates of this site. The developer considers the consistent delivery 60-75 homes per annum on this site to be unrealistic for one developer, in reality it is more likely to be 30dph, at best. Delivery rates will also be slowed due to the infrastructure required to facilitate the development. This includes the implementation of the new Heyhouses Link Road, which as **Appendix 2** of the draft Infrastructure Development Plan (September, 2015) confirms does not have committed capital to implement. It is unlikely that the full 1,150 homes will be delivered within this plan period. At a more realistic delivery rate of 30dpa, it is expected the site will deliver at best 630 homes over the plan period. To ensure the full objectively assessed housing of this plan period are met in full there is the need for further sites to be allocated as part of the Local Plan. Site **HSS2** is a residential site situated within the urban area, off Heyhouses Lane, and has an allocation for 250 homes. Two thirds of the site benefits from planning permission for a mix of uses, including the provision of 162 homes. This development commenced in 2014 and is expected*

to be completed in 2020. Paragraph 7.21 of the RPO document states one third of the site remains occupied by Electronic Data Systems (EDS). The Council has produced no up-to-date evidence that the site will be available for development within the plan period. Until such evidence is provided the developer objects to the allocation of this part of the site within the Local Plan. Site **HSS3** – Lytham Quays, Lytham is a residential site on the eastern boundary of Lytham and has planning permission for 120 homes. Development commenced in 2007/2008 and is expected to be complete in 2016. The developer accepts that this site will contribute towards Fylde's housing requirement within the plan period. There does not appear to be any contingency or policy mechanism in place through which the council can respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

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

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

Paragraph 7.20

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

Paragraph 7.21

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

Paragraph 7.23

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

Paragraphs 7.24 and 7.25

*Natural England commented that there appears to be a degree of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations, 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would provide certainty that housing can be delivered during the plan period. It may be that Fylde can confirm that further discussion has taken place between the council and United Utilities with respect to proposed growth and require infrastructure, taking into account recent Water Cycle Studies and the Infrastructure Delivery Plan. It would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised Habitat Regulations Assessment. Two examples where there are uncertainties are as follows: ‘Foul and surface water runs into the same combined sewer and this can result in flooding problems and detrimental effects on bathing water quality along the Fylde Coast, especially during periods of heavy rainfall and storm surges. A number of watercourses in the area discharge to the combined sewage system. There is some limited capacity in the combined sewer system. However, additional loading of the system caused by further development could impact upon overflow spills into the Ribble Estuary and exacerbate effects on bathing water quality, notifiable features and tourism. Therefore, discharges to the combined sewer system will only be permitted as a last resort’ and ‘Infrastructure capacity for wastewater and water supply is limited for Queensway, St Annes (site **HSS1**)’.*

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

Paragraph 7.28

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

Paragraph 7.29

*Lytham St Annes Cycle Group objected claiming that: development at site **HSS1** - Queensway should incorporate a designated cycle route to connect the proposed Northhouses Lane cyclepath (to St Annes) via Wildings Lane and Singleton Ave. The existing Lytham Moss*

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

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

Council response

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

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

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

The council notes a landowner's objection to the omission of site **H2** – Land West of North House Lane, St Annes and site **H3** – Land North of Moss Hall Lane, Lytham from the RPO version of the Local Plan (see map at back of the Responses Report). The council has excluded

the two sites from the RPO version because the majority of site **H2** is designated as a Biological Heritage Site (BHS); and part of site **H3** is designated as a BHS.

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

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

The council notes a developer's objection to site **HSS2** – Heyhouses Lane, St Annes, claiming that, as paragraph **7.21** says - one third of the site remains occupied by Electronic Data Systems (EDS), the site will therefore not be available for development within the plan period. A planning application for housing on the land occupied by Electronic Data Systems (EDS) has been submitted to the council for determination, since the consultation commenced into the RPO version of the Local Plan. Consequently, developers are interested in developing the remaining third of the site within the plan period. The council notes the developer's support for the allocation of site **HSS3** – Lytham Quays in the Local Plan. The developer's objection regarding a shortfall in housing should the Strategic Locations fail to come forward is dealt with under policy **H1** in Chapter 10.

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

Paragraph 7.20

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

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

Paragraphs 7.24 and 7.25

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

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

Paragraph 7.28

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

Paragraph 7.29

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

Recommendations for change

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

Additional recommendations for change

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

Additional textual changes

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

Policy SL2: The Fylde-Blackpool Periphery Strategic Location for Development**Number of representations:**

Comment	Support	Object	Total
15	36	12	63

Representations received from:

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

What you said

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

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

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

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

Blackpool Council commented that the concentration of development proposed at the Fylde-Blackpool periphery will have impacts for Blackpool in terms of its services and infrastructure. The allocations in total will impact on the local and strategic highway networks. It is suggested that the quantum of development trips should be made available, together with the distribution of traffic, so assessments on the operations of key links and junctions on the networks (Lancashire County Council, Highways England and Blackpool networks) can take place. It is vital that reference is made in the Local Plan to the fact that some of the

*infrastructure requirements at the Fylde-Blackpool Periphery fall within Blackpool and that monies may need to be provided to Blackpool Council to make the development acceptable. This could be provided in the supporting text/reasoned justifications to policies **SL2** and **INF2**. The total objectively assessed housing need for Blackpool, as set out in the Core Strategy and accepted by the Inspector, is 4,200 homes between 2012 and 2027. The approach taken in the RPO provides for a further 2,622 homes on the edge of Blackpool (until 2032), which increases the total number of additional homes in the Blackpool built-up area by over 60% and means that over 6,800 new homes are proposed. Blackpool has concerns about the quantity of development proposed in this location and its potential impacts. New development on the Fylde-Blackpool Periphery will increase the supply of housing in the Blackpool built-up area and provide increased competition in the Blackpool housing market, which does not have an infinite capacity. It may discourage developers from purchasing land in Blackpool itself, delaying starts, or building at slower build-out rates because of the increased supply in the local area. This could have implications for Blackpool's housing strategy because there would be slower growth in the town itself, leading to lower levels of New Homes Bonus and commuted sum payments, with subsequent negative impacts for inner area regeneration. It is accepted that approximately 80% of the homes proposed on the Fylde-Blackpool Periphery have planning permission, or are subject to current planning applications. Therefore, they are already progressing and are not dependent upon allocation in the Local Plan. However, site **HSS5** (Cropper Road West), where 442 homes are proposed, does not currently have planning permission and is not subject to a planning application. Planning permission has recently been granted at appeal for up to 360 additional homes in Warton on land that is not proposed in the RPO (or the Bryning with Warton neighbourhood Plan). This permission increases the overall housing supply within Fylde and therefore it is suggested that the proposed housing allocations in the RPO should be revisited because there is no longer a need to allocate all of the land that is currently proposed for housing. Blackpool Council suggests that site **HSS5** (Cropper Road West) could be de-allocated to reduce the likelihood of the proposed housing allocations on the Fylde-Blackpool Periphery impacting negatively upon Blackpool's housing strategy, and also to reduce the impact on infrastructure and services in the South Blackpool area. Blackpool would therefore welcome the opportunity through the Duty to Co-operate to explore with Fylde the possibility of including a specific policy within the Fylde Local Plan relating to housing on the Blackpool periphery. The policy would provide the basis to enable off-site payments for affordable housing for expenditure in Blackpool, where deemed appropriate.*

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

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

*Wild Lane and Peel Road Landowners collectively control the land at Whitehills between Peel Road and Wild Lane extending south from the Cropper Road, Whitehill Road and B5410 roundabout. The northern portion of the combined landholding was included in the SHLAA (site ref. **BP13**) and deemed to be developable with an anticipated capacity of 956 no. homes. This area and land to the south was also put forward as a potential Strategic Site in response to the 2015 Call for Strategic Development **Sites Refs. 19, 44, 64, 66, 86, 90 and 96**, and is shown as an Additional Strategic Site on the Sites Assessments Background Paper (October 2015) land referencing map. Joint and individual comments submitted by the Landowners in response to the Council's Call for Strategic Development Sites of 13th January 2015 specifically focussed on the land west of Peel Road, confirmed their land was collectively available and the detailed comments submitted by Steven Abbott Associates LLP, demonstrated that it was suitable for development and that substantial residential or mixed-use development could readily be achieved. The opportunity to explore the potential of the land between Wild Lane and Peel Road resulted from the overall response to the first Preferred Option Local Plan consultation in 2013, which highlighted the mismatch between the proposed levels of growth at the other Strategic Locations for Development and especially at Warton. The case made by the Landowners and Steven Abbott Associates LLP in response to the Call for Strategic Development Sites confirms; the land offers a logical and sound area of search for a strategic development site due to its close proximity to existing services, facilities and infrastructure (and to a lesser extent, Lytham St Annes, albeit this will be increased following completion of the M55 / Heyhouses Link Road); in landscape and environmental terms, the general area is not of high quality; opportunities exist to provide a sustainable urban extension which can meet development needs over the whole plan period, and; published SHLAA information demonstrates that the northern part of the land is considered to be suitable and deliverable for development, and this applies equally to the balance of the land outside the area included in the SHLAA. The land therefore represents a sound option for development and offers the opportunity to deliver a scale and quantum of development that enables a sustainable new community to be created and a holistic and comprehensive approach to be taken to meeting full, objectively assessed development needs. The council will be aware that this approach was advocated in the M55 Hub proposals developed jointly with Blackpool Council and presented to Fylde Cabinet Members in July 2009. Whilst that particular initiative is no longer being pursued, the aims and objectives presented in the M55 Hub Prospectus and masterplan*

*continue to have merit and several aspects of the development have / will be delivered and are incorporated into the proposed land allocations within the Whitehills part of the Fylde-Blackpool Periphery Strategic Location for Development. These include the mixed use allocation at Whyndyke Farm which also benefits from outline planning permission; the mixed use allocation at Cropper Road East, and the various housing and employment allocations and commitments within the Whitehills development area (also supported by the Whitehills Development Appraisal and Masterplan of October 2013). A further quadrant of the former M55 vision will be delivered by the neighbourhood planning approach advocated by the Blackpool Local Plan Part 1 - Core Strategy for Marton Moss which is nearing adoption. The only component of the M55 concept that has not been delivered by other means, is the growth and country park extending south from Whitehills Road and enclosed by the committed M55 / Heyhouses Link Road. The Council put forward a number of reasons why the Landowners' collective landholding was not taken forward as an Additional Strategic Site as earmarked in the Sites Assessments Background Paper (October 2015). This confirms there are no insurmountable technical or environmental constraints preventing development and that the principal reason for rejecting the site was the consideration that focusing greater development in the area would lead to an over-concentration in the Fylde-Blackpool Periphery Strategic Location for Development. The Council's response to a number of the Call for Strategic Development Sites land nominations also includes the reason that the M55 and its slip roads is considered to be a barrier to movement within the wider area. The Landowners' response to these comments is that as the M55 Hub prospectus demonstrates, and the previous comments by Steven Abbot Associates LLP confirm, a purposeful concentration of development in the area, planned as a comprehensive, holistic new community, can deliver benefits over dispersed growth at Key and Local Service Centres and can have added long-term value and lower overall / shared infrastructure costs. The comment that the M55 also restricts movement between the area and the wider Borough is also firmly disputed. The Whitehills area at Junction 4 of the M55 is one of the most accessible locations in Fylde and the reason why major employers like the Department of Work and Pensions are located at Whitehills. In addition, the construction of the M55 / Heyhouses Link Road will improve accessibility and connect the area to Lytham St Annes. The road is fully funded and expected to be complete by 2020. In conclusion, Wild Lane and Peel Road Landowners consider that by overlooking the potential of the land within their collective ownership between Wild Lane and Peel Road (**Site Refs. 19, 44, 64, 66, 86, 90 and 96**) to provide an additional housing (or mixed use) allocation / additional strategic site, or an area of search, proposed policy **SL2** is flawed. The policy should be revised to ensure the land is included in the next version of the Local Plan.*

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

this should be reduced to somewhere nearer the 500 homes anticipated within the previous version of the Preferred Options in 2013, which is a much more realistic assessment.

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

A landowner sought the allocation of 2 Ha of land both for Blackpool South Caravan Club purposes and for residential development, on land north east of Cropper Road. The site is currently within the Countryside area close to allocated employment land and residential developments. If the club is to remain in situ on their current site on Cropper Road they will need to expand onto the land to the north east. This land is favourable for the extension of the caravan club site as it is directly adjacent to the current boundary of the site, the site is not under any environmental designations and will allow for the caravan club to retain this site and continue to operate in the area supporting the tourism industry and local employment. The Caravan Club recognise however that the land directly to the south of their site is promoted for housing and can see the logic of this being extended over their site. The Caravan Club would however only be willing to agree to this if they could relocate to the land on the opposite side of Cropper Road. The Caravan Club therefore ask that this land is safeguarded for caravan use if housing use on the existing site is desired. The housing development would need to cross subsidise the relocation process, should this action be preferred the site would be available immediately following the relocation.

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

that the countryside term is denying residents the ability to build new homes, but big developers can build on farmland.

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

*A developer endorsed and supported the allocation of land at Cropper Road West, Whitehills (site **HSS5**) in the Plan for 442 homes. Policy **SL2** (The Fylde-Blackpool Periphery Strategic Location for Development) sets out a number of proposals for development of the following strategic sites identified on the Inset Maps. Our client's site **HSS5** is set out in the policy with a projected commencement date of 2020. The developer considers the site could come forward early with first completions in 2017/18. 'An agreed masterplan and an approved design code for the comprehensive development of the wider Fylde-Blackpool Periphery Strategic Location for Development, which includes land along the Blackpool Airport Corridor at Squires Gate, which will be shown on the **Policies Map**, should make provision for a range of land uses to include homes, employment and commercial uses, Green Infrastructure network and community facilities. A phasing plan should be submitted by the applicant; and a programme of implementation agreed by the Council in accordance with the masterplan and the design code.' On reading the above it would be inferred that there should be an agreed masterplan for the all the sites listed. The developer considers that this should not be the case and indeed paragraph **7.39** of the Plan states that for site **HSS5** that any proposal for the site should be accompanied by a comprehensive masterplan agreed with the Council. This clearly refers to this site only and not the wider sites allocated in policy **SL2**. A masterplan was submitted by the developer with the representations and welcomed further discussion with the Council on this and to have an agreed masterplan that all parties could work to going forward. Therefore the text in policy **SL2** should be altered to state that each site in the policy should be accompanied by an agreed masterplan for each specific site. The developer supported the allocation and the extension of the settlement boundary as proposed; and confirmed that the site is available, suitable and achievable, i.e. is deliverable and could come forward now with first completions in 2017. The site is identified for 442 homes in the policy, but the developer considers the site could accommodate up to 450 homes. The developer proposed that site **HSS5** is revised to state 450 homes. The site could deliver from 2017/18 onwards and there are no technical issues which require the development to start later in the plan period. For policy **SL2**, the table should now state: site **HSS5** - Cropper Road West, Whitehills 450 23.1Ha 2017/18 and clarify that a masterplan is for site **HSS5** only.*

*A developer was concerned with the reliance placed on 10 sites to deliver 80% of the housing requirement for the Borough, particularly the significant reliance placed on sites in Lytham St. Annes and the Fylde-Blackpool Periphery. The developer considered the allocation for the Fylde-Blackpool Periphery Locations to be too high from a market saturation perspective, and not a location where people wish to live. For example sites in Kirkham and Wesham are currently delivering at a much quicker rate than those in the other three Strategic Locations. Site **HSS4** – Coastal Dunes, Clifton Drive North, is situated to the west of Blackpool Airport in the Blackpool Airport Corridor and was previously used as a holiday park. The site has planning*

permission for 348 homes. The developer is aware that construction has commenced on site and the development is being actively marketed by Persimmon Homes. The developer accepts that there is no evidence why this site will not be deliverable within the plan period. Site **MUS1** – Cropper Road East, Whitehills is a mixed use development site. Development of 146 homes has commenced on part of this site and is expected to be completed by 2022. There are two other outline applications on the site for a mix of employment and residential use, for 200 and 26 homes respectively. The delivery of the site is dependent on improvements to local infrastructure; however, the scale of development in this location is considered to be achievable over the plan period. Site **MUS2** – Whyndyke Farm, Preston New Road (A583), Whitehills is a mixed use development site and benefits from outline planning permission for 1,310 homes; including the provision of two new local neighbouring centres, a primary school and a health centre, in addition to improvement to Junction 4 of the M55. **Appendix 2** of the Local Plan expects Site **MUS2** to start delivering in 2018, consistently delivering 100-110 homes per annum between 2020 and 2032. Again, the Plan is unclear what assumptions are being applied by the Council relating to their delivery of this site. The developer considered the consistent delivery 100-110 homes per annum on a site of the scale of **MUS2** – Whyndyke Farm to be unrealistic, given the scale of the infrastructure required to facilitate the development, including improvements to Junction 4 of the M55, provision of neighbourhood centres in addition to education and health provision. Furthermore, the scale of this site means that it is likely to be developed by multiple housebuilders. Whilst this would increase the overall output of homes achieved per year in comparison to a smaller sites, the annual delivery rate from these sites must not be overestimated as increased local market competition can serve to dampen delivery rates typically achieved. The rate of delivery from this site must not therefore be assumed to increase incrementally at a rate which is consistent with sites of one or two developer outlets, but marginally decreased proportionately with each new additional developer to take account of the effects of market saturation. The developer considered it unlikely that the full 1,310 homes will be delivered within this plan period. In order to ensure that the full objectively assessed housing needs of this plan period are met in full there is a need for further sites to be allocated. Site **HSS5** is situated west of Cropper Road, Whitehills and is expected to deliver 442 homes over the plan period, with delivery expected to start in 2020. At present the site would not be suitable for development as access to the site via Cropper Road is limited. Significant highways improvements to Cropper Road would be required to facilitate the development. The Council has failed to provide any evidence that this would be achievable or viable. The site is also currently unavailable and within the ownership of multiple land owners who currently occupy the site. This has the potential to impact upon the lead in time of the site if one landowner is not willing to co-operate. No evidence has been provided that the site will be available for development in the long term. Furthermore, the market competition of other sites coming forward earlier in the plan period within the Fylde-Blackpool Periphery can serve to dampen delivery rates. The developer does not consider that this site is deliverable within the plan period. Site **HSS6** is situated off Lytham St Annes Way, at Whitehills and has planning permission for 150 homes. The developer is aware that development has commenced and accepts that the site will be deliverable within the plan period. There does not appear to be any contingency or policy mechanism in place through which the Council can respond to a shortfall in housing should the Strategic Locations fail to come forward, or deliver fewer homes than estimated.

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

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

Paragraph 7.30

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

Paragraph 7.31

*Lytham St Annes Cycle Group objected claiming that site **HSS4** – Coastal Dunes should incorporate a designated cycle route from Squires Gate railway station to emerge at the farther end of the development and emerge along Clifton Drive North. Ideally, this route should continue through the Starr Hills nature reserve (alongside the railway fence) to emerge further down Clifton Drive North (or into Kilgrimol Gardens).*

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

Paragraph 7.32

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

Paragraph 7.33 and 7.34

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

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

Paragraph 7.35

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

Paragraph 7.36

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

Paragraph 7.37

*An Action Group questioned why there would be: ‘No discharge to the public sewerage system from the site will take place until appropriate surface water mitigation measures have been implemented, and no surface water from the site shall discharge to the public sewerage system at any time’ as set out in paragraph **7.37**.*

Paragraph 7.38

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

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

Paragraph 7.39

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

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

Paragraph 7.42

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

Paragraph 7.47

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

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

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

Council response

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

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

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

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

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

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

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

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

The council notes a landowner's objection to the omission of their land at Madhuban, Cropper Road North, Westby from the RPO version of the Local Plan (see map at back of the Responses

Report). The site is not large enough to comprise a strategic site, but it could constitute a windfall site, accommodating up to 9 homes.

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

The council notes a developer's objection to the quantum of development proposed in the Fylde-Blackpool Periphery Strategic Location for Development, as opposed to the Kirkham and Wesham Strategic Location for Development. The council also notes the developer's questioning of whether site **HSS5** – Cropper Road West, Whitehills and site **MUS2** – Whyndyke Farm will be delivered within the plan period. The council has received confirmations from the landowners at sites **HSS5** and **MUS2** that they will be entirely built-out during the plan period. The Housing Trajectory in **Appendix 2** of the RPO version of the Local Plan indicates that all 1,310 homes on Whyndyke Farm and 442 homes on Cropper Road West will be delivered within the plan period, which ends on 31st March 2032. The council does not consider it necessary to identify additional sites above and beyond those already allocate in the RPO version of the Local Plan. The council notes the developer's request for a contingency or policy mechanism through which the council could respond to a shortfall in housing, should the Strategic Locations fail to come forward, or deliver fewer homes than estimated. This issue of a contingency to respond to a shortfall is addressed under policy **H1** in Chapter 10.

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

Paragraph 7.30

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

Paragraph 7.31, 7.33, 7.34, 7.35 and 7.47

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

Paragraph 7.34

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

Paragraph 7.36

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

Paragraph 7.38

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

Paragraph 7.42

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

Paragraph 7.47

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

Recommendations for change

- Amend the second sentence in policy **SL2** to read: '~~An~~ agreed masterplans and ~~an~~ approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the wider Fylde-Blackpool Periphery Strategic Location for Development, which includes land along the Blackpool Airport Corridor at Squires Gate which ~~will be~~ are shown on the Policies Map...'
- Amend the number of homes in policy **SL2** for **MUS1** – Cropper Road East, Whitehills to read: ~~372~~ 446; and for **HSS5** – Cropper Road West, Whitehills to read: ~~442~~ 450 and its projected commencement date to 2017/18 ~~2020~~'

- Add the following sentence to the end of paragraph **7.41**: ‘It is essential that prospective developers in the Fylde-Blackpool Periphery Strategic Location for Development work closely with both Fylde Council and Blackpool Council to ensure that issues relating to Blackpool and the wider area are fully taken into account.’
- Add a new paragraph after paragraph **7.47** and re-number the subsequent paragraphs: ‘7.48 The Fylde-Blackpool Periphery is predicted to have a significant shortfall of primary school places within the next five years. Therefore, further primary school provision will be required if housing demand and / or births continue to increase at the same rate.’
- The council will engage with LCC as the Highways Authority over the provision of further evidence – i.e. modelling work – to forecast the impact of proposed allocations on the existing highway network, and forward the results of this work to Highways England for due consideration.

Additional recommendations for change

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

Additional textual changes

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

Policy SL3: Warton Strategic Location for Development

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Number of representations:			
Comment	Support	Object	Total
9	0	13	22

Representations received from:

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

What you said

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

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

*CPRE – Fylde District was concerned with the implications and consequences of the identification of Warton as a Strategic Location. The CPRE – Fylde District claimed that this could only give support to further loss of greenfield sites to development despite a large amount of previously developed land becoming surplus to BAE's requirements. CPRE – Fylde District considers there are valid planning grounds for part of the Enterprise Zone land to be reallocated for housing, due to the fact that there appears to be little demand for employment use. It is wrong to say that a key characteristic of Warton is that it 'is part of the main urban area which runs adjacent to the coastline' (paragraph **2.41**). Warton is in fact a village separated from the urban area of Lytham St Annes by land designated as Green Belt. CPRE – Fylde District's concerns have been confirmed in that the ambition of policy **SL3** to provide 'up to 650 homes inclusive of existing plan period commitments' has already been breached by*

*the appeal decision for greenfield land at Blackfield End Farm (Appeal 2217060 24th September 2015). This site is not proposed for allocation in the RPO. CPRE – Fylde District also criticised the lack of 'new' employment land allocation at Warton in **SL3** as represented by the Enterprise Zone. The CPRE – Fylde District considered that policy **SL3** as stated is not sound.*

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

A landowner commented now that the Blackfield End Farm development has been approved, the following developments to the north and west of Warton could be combined to provide a coordinated masterplan across Warton, including improved links and permeability, and an example of this is set out on the Warton Spatial Masterplan. These comprise:

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

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

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

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

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

A landowner commented that policy **SL3** sets out the strategic allocations and policy approach proposed for the Warton Strategic Location for Development to 2032, based on delivery of 'up to' 650 homes. Firstly, using the phrase 'up to' does not accord with the Framework nor the overall housing requirement in policies **DLF1** and **H1** which clearly state that the 370 dpa requirement is a minimum; and therefore the wording should be updated to state 'at least' or 'a minimum of' x homes. Secondly, it should be noted that the Secretary of State's approval of the Blackfield End Farm appeal means that committed development in Warton since 2011 now stands at 779, and therefore the 650 figure has already been exceeded and should be updated, with Blackfield End Farm included as a strategic allocation and within the housing trajectory at **Appendix 2**. Notwithstanding this, the evidence shows this figure should be increased further, firstly to reflect the total supply figure of between 11,088 and 11,340, and to align with the level of and proportion of development set out in the previous Preferred Option document, as this has reduced significantly since 2013, with insufficient justification. The reduction in numbers in Warton from 1,160 to 650 was first recommended by the council within the Responses Report to the 2013 Preferred Options, issued in July 2014. A requirement of 638 homes was also put forward in the draft Warton Neighbourhood Plan which went on consultation through July and August 2014, and this was then rounded up to 650 in the Submission version Neighbourhood Plan which went on consultation in October/ November 2014. These figures were both informed by meetings that the council and Neighbourhood Plan Steering Group had had with ATLAS; the government advisory service for large strategic developments/urban extensions. However it is the landowners strong view that the 650 figure arrived at has been entirely based on a misunderstanding of a comment made by ATLAS in relation to the developable areas of the Local Plan Preferred Options Allocations shown under policy **SL3**. In advising the NPSG on a number of matters, ATLAS advised that the developable area of the **SL3** allocations was likely to be around 55% of the total area after accounting for green infrastructure, non-developable land and other considerations. Notably, 55% of 1,160 equates to 638 which is the precise figure that was proposed in the Draft Neighbourhood Plan. Indeed, direct reference is made within the Draft Neighbourhood Plan to ATLAS's recommendations and the 55% development figure and how 638 is derived. However, ATLAS confirmed in their response to the Draft Neighbourhood Plan that they were referring to a developable area percentage and not the quantum of homes that should be delivered. As such, the original 638 figure had no robust foundation in terms of addressing an objectively assessed housing need for Warton or the Borough and even less justification is provided for the 650 home figure, which appears to be a simply rounding up of the previous 638 homes. Indeed, no local needs assessment was carried out by the Parish Council. There is no conclusive evidence to indicate that a higher housing growth figure could not be achieved (due to physical constraints for instance). It is clear that that significant additional housing land for as much as 3,150 homes will need to be made available within Fylde by 2032 for them to meet their full housing needs and economic growth aspirations. Much of this additional housing will need to be accommodated within the four Strategic Locations for Development, with particular pressure on Warton, given the Green Belt and drainage constraint in other strategic locations, and the evidence supporting the 2013 Preferred Options document has already confirmed that Warton could accommodate at least 1,160 homes. This represents an uplift of 510 from the 650 currently proposed in the plan, which equates to 16% of the additional 3,150 required. In summary, this section and the supporting plans have demonstrated that a minimum of 510 homes (including up to 280 within the Clifton House Farm site) could be accommodated within

*Warton as part of a masterplanned approach that meets the requirements and criteria of Policies **M1** and **SL3**, whilst also protecting against the speculative development that has been allowed in Fylde in recent years due to the council's inability to demonstrate a 5 year supply. Therefore, the landowner strongly objected to the allocation of just 650 homes within the Warton Strategic Location for Development, and suggested this be increased to a minimum of 1,160 homes in line with previous evidence. The Sustainability Appraisal from the Preferred Options document has already demonstrated that Warton can support at least 1,160 homes, which would take up approximately 16% of this additional need. However, given the Green Belt, drainage and infrastructure constraints present within other parts of the Borough and the hugely optimistic delivery rates on existing allocations; coupled with the fact that Warton is a sustainable location with an Enterprise Zone and links to the Preston West Distributor Road, Warton could therefore accommodate an even larger proportion of this increased requirement.*

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

reduced from 1,160 to 650, however there is no reference to a change in the role of Warton as a strategic location for development. Indeed the report explains that unlike other strategic development locations, Warton is not tightly constrained by Green Belt, flooding, infrastructure constraints or environmental designations, and that housing allocations are intended to complement the jobs to be created in the Enterprise Zone (para 129)'... 'At this stage the housing figures in the ELP, both for the Borough as a whole and for Warton, carry only limited weight (paragraph 130)'... 'Insofar as Warton is concerned, there is no clear explanation in the Responses Report to justify the reduction in housing numbers indicated therein (para 131).' In conclusion, there is no evidence to suggest that Warton could not accommodate at least the 1,160 homes proposed within the previous Preferred Option version of the Local Plan.

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

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

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

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

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

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

Paragraph 7.48

Two residents objected claiming that there is little point in providing extensive detailed comments because the new Plan to 2032 is already out of date as a result of the Secretary of State's decision to approve the building of up to 360 new homes at Blackfield End Farm, Church Road, Warton (planning application 13/0674), against the objections of local residents, Fylde

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

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

Paragraph 7.51

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

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

Paragraph 7.52

*Bryning with Warton Parish Council commented that it is likely that wastewater infrastructure in the Warton area will need to be upgraded in order to deliver additional sites to Highgate Park (site **HSS7**) i.e. those identified in the Neighbourhood Plan'. Representations based on local knowledge and experience in Warton has raised sewerage and surface water drainage*

*concerns on every significant development application since preceding the work on this Local Plan. Failure to address these concerns will have significant long term implications in consideration of existing problems and those anticipated by climate change. The proactive response by the Borough Council toward these issues, outlined in the Plan, are congratulated but it is somewhat concerning that it is contradicted by the wording of such policy **CL2** 'by the need for compelling and detailed evidence demonstrates'.*

Paragraph 7.53

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

Paragraph 7.55

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

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

Council response

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

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

The council notes CPRE – Fylde District's comments regarding the need to allocate homes within the Enterprise Zone at BAE Systems, Warton, and CPRE – Fylde District's claims that 'there appears to be little demand for employment use' on the EZ land. The council considers there is sufficient land allocated in the four Strategic Locations for Development, without the

need to provide additional housing land. The Enterprise Zone at BAE Systems, Warton is a national land designation and it is not factored into the council's employment land provision. However, the EZ is designated solely for advanced engineering and manufacturing as set out in the Local Development Order and not for the provision of new homes.

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

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

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

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

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

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

The council notes a resident's objection to development in the Warton area and the disappointment that this had not been anticipated years ago, in time for the construction of a bypass around Warton. The infrastructure requirements – including transport for Warton

and Fylde in general - are set out in the draft Infrastructure Delivery Plan, which accompanied the RPO version of the Local Plan.

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

Paragraphs 7.48, 7.51 and 7.53

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

Paragraph 7.51

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

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

Paragraph 7.52

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

Paragraph 7.53

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

Paragraph 7.55

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

Recommendations for change

- Amend the second sentence in policy **SL3** to read: '~~An agreed masterplans and an approved design codes for each specific strategic site listed above which does not have planning permission within for the comprehensive development of the Warton Strategic Location for Development, which will be is shown on the Policies Map ...~~'
- Amend policy **SL3** to include all existing commitments in the Warton Strategic Location for Development.
- Add the following sites to policy **SL3**: '**HSS11** – Riversleigh Farm, Warton - 82 homes; **HSS12** – Nine Acres Nursery, Harbour Lane Phase 1 – 66 homes; **HSS13** – George's Garage, Warton – 16 homes'
- An area of land for a new local retail centre in Warton will be identified on the **Policies Map**.
- The council will contact United Utilities to confirm the delivery of sufficient wastewater infrastructure to accommodate development in some areas of Warton identified in the RPO version of the Local Plan.

Additional recommendations for change

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

Additional textual changes

- Amend the first sentence in policy **SL3** to read: ‘Proposals for development of the following strategic and non-strategic sites identified on the ~~Inset Maps~~ Policies Map at ~~the back of~~ accompanying this plan will be supported as follows:’
- Delete the following text from policy **SL3**: ‘~~The Council will work with the Bryning-with-Warton Neighbourhood Planning Steering Group on a masterplanning exercise as part of the Neighbourhood Plan for Warton, to identify land for the provision of up to 650 homes (inclusive of existing plan period commitments).~~’
- Add the following text to policy **SL3**: ‘**HSS2 – Blackfield End Farm, Warton – 360 homes to be completed during Plan period**’
- Amend the penultimate sentence of policy **SL3** to include: ‘... and community facilities including a new local retail centre.’
- Amend the last sentence of policy **SL3** to read: ‘A ~~phasing plan should be submitted by the applicant; and a programme of implementation should be agreed by~~ between the council and the developer in accordance with the masterplans and the design codes.’
- Amend paragraph **7.48** to read: ‘This ~~Revised Preferred Option~~ Publication version of the Local Plan identifies commitments for the provision of up to ~~650~~ 778 homes in Warton over the plan period.’
- Add the following new sub-heading and paragraph after the text relating to Highgate Park, Lytham Road, Warton: ‘**Blackfield End Farm, Warton (site HSS2) - Outline planning application (13/0674) for erection of up to 360 homes following the demolition of existing buildings (with all matters reserved), on land opposite Blackfield End Farm, was allowed on 24th September 2015.**’

Policy SL4: Kirkham and Wesham Strategic Location for Development

Number of representations:

Comment	Support	Object	Total
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8	5	9	22
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Representations received from:

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

What you said

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

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

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

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

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

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

A resident claimed that at present, all the approved building in the Fylde, only managed to produce 200+ homes this year. At the inquiry into the development at Little Tarnbrook Farm, which was subsequently allowed by the inspector, the two building firms (Gladman Housing and Bloor Homes) under questioning from the inspector assured her that they intended to,

and had the capability to, build homes themselves according to the plan submitted, and were not intending to sell on the planning permission to anyone else. Subsequently they sold on the rights to two other housing developers. The reasons given by them at the inquiry to justify their application was the failure to meet the then existing annual government targets by the council - particularly social housing. Since, then another housing developer has applied to extend to the next field to build another 250 homes. By delaying the building of the approved housing, this means that the same reasoning can be used again in the future to secure more land for building, and destroy more Green Belt land, before they have produced the housing that they have permission for. The resident suggested that the council consider that the annual number of homes on the Local Plan be reduced to 300, in light of the inability of the existing developers to produce more per year and the council makes it clear to existing developers that they will not consider, and will object, to any applications for future developments by them, until they have completed 50% of their total existing developments, and that this must include 50% of the social housing proposed on the application.

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

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

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

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

Paragraphs 7.60 and 7.61

*A landowner objected to the omission of Kirkham Grammar School Playing Fields from site **HSS9** (Land North of Blackpool Road, Kirkham. The Grammar School does still wish the playing fields site to be considered for development. It is assumed that the omission of the site from allocation site **HSS9** (land north of Blackpool Road) has been an error on behalf of the council and certainly does not reflect any changed position from the landowner.*

Paragraph 7.72

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

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

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

Paragraph 7.73

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

Paragraph 7.74

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

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

Council response

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

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

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

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

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

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

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

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

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

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

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

Paragraphs 7.60 and 7.61

The council disagrees with a landowner that Kirkham Grammar School Playing Fields should be included in site **HSS9** – Land North of Blackpool Road, Kirkham, as the playing fields should be retained and not lost to residential development.

Paragraph 7.72

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

Paragraphs 7.72 and 7.73

The council notes the comments made by the Lytham St Annes Cycle Group and a resident regarding cycleways in the Kirkham and Wesham Strategic Location for Development. Cycle provision is set out in detail in section 2 of the Infrastructure Delivery Schedule (IDP) and the

associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study, which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Paragraph 7.74

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

Recommendations for change

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

Additional recommendations for change

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

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Additional textual changes

- Amend the first sentence in policy **SL4** to read: ‘Proposals for development of the following strategic sites identified on the ~~Inset Maps Policies Map~~ at the back of accompanying this plan will be supported as follows:’
- Amend the last sentence of the second paragraph of policy **SL4** to read: ‘A ~~phasing plan should be submitted by the applicant; and a programme of implementation should be agreed by~~ between the council and the developer in accordance with the masterplans and the design codes.’
- Delete criterion ii) in policy **SL4**: ‘~~Measures, such as a landscape buffer, to avoid indirect impacts on the Biological Heritage Site and designated sites should be incorporated into the design of the site on The Pastures, Fleetwood Road, Wesham (site HSS8)~~’.

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

Number of representations:

Comment	Support	Object	Total
16	5	208	229

Representations received from:

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

What you said

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

Paragraph 7.75 - Freckleton

An Action Group objected to just 38 homes being developed in Freckleton, which is a Tier 1: Larger Rural Settlement with many facilities / amenities which the Group claims is not

acceptable when other Tier 1: Larger Rural Settlements are having to accept 18 times that volume.

Paragraphs 7.77 and 7.86 - Elswick

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

A developer supported the allocation of residential development within Elswick as a sustainable settlement for growth; however, objected to the mechanism of allocation via the Neighbourhood Plan process (paragraph 7.76). The village is yet to be designated as a Neighbourhood Plan area and no progress has been made on drafting the Plan. This leaves many uncertainties over the delivery of housing in Elswick and it is too simplistic to suggest that a future Neighbourhood Plan would address such anomalies. The developer recommended that the council looks to allocate sites as part of the Local Plan process to ensure there is a mechanism to deliver housing in Elswick, should the Neighbourhood Plan not come forward. The developer has an interest in the Land to the north of Mill Lane, which has the potential to deliver up to 100 homes. The developer claims the development of this site would contribute to the creation of a sustainable mixed community through the potential to provide an appropriate mix and type of housing on the site. Development of the site would also help stimulate the local economy by generating additional spending power in the local community. The developer claimed the site is immediately available for development and there is no land in other ownerships which must be acquired to develop the site; and no restrictive covenants exist. There is a pond located within the site which is proposed to be retained as part of any development proposal. A full Ecology Survey Report will be submitted with any planning application. The site is located within Flood Zone 1 on the Environment Agency's Flood Risk Map and therefore, the site is at a low risk of flooding. Vehicular access can be obtained off Mill Lane. Croft Transport Solutions has provided a drawing indicating the proposed access arrangement as well as 'A Preliminary Vehicular Access Note'. It is proposed to retain the existing hedgerow around the perimeter of the site whilst enhancing the landscaping along the eastern boundary to create a softer edge to the development. The developer claims the development of the site would make a valuable contribution to the Borough's housing land supply and therefore should be allocated as part of the Local Plan. The developer considered that the council must look to allocate additional sites to ensure that if there is a failure to deliver, an ongoing shortfall is avoided. This includes the allocation of sites

within the Tier 1: Larger Rural Settlements. The council should not assume that the existing commitments within these rural settlements will meet the objectively assessed needs of the Borough as a whole, nor should sites be left to be allocated at an unspecified point in time through the Neighbourhood Plan process.

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

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

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

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

An 11.16% increase similar to that at Clifton would provide 54 homes. Applying the overall percentage allocation for the Fylde villages (16.07%) to Elswick would support 74 homes. Elswick Parish Council considers that these figures are far more realistic, manageable and sustainable. Adopting either of these figures would allow the council to proceed with a neighbourhood plan minimising the impact on the village by developing several small sites rather than huge uncharacteristic housing estates.

Other issues which the Parish Council claims support a reduction in the numbers of house proposed for Elswick include the following: The sustainability study undertaken by Fylde concluded that Elswick is one of the least sustainable villages in the Borough. It has no school, no health centre, only one shop, no post office and it is six miles from the nearest supermarket. Not only is the village remote but it only has an hourly bus service with no buses after 7pm or on Sundays. LCC has announced that it will be withdrawing all bus subsidies in March leaving Elswick with no public transport. The nearest public transport will be in Kirkham or Poulton, 6 miles away. The Health Centre at Great Eccleston (1.5 miles away) has waiting times of 2 to 3 weeks to see a doctor. Attempts to relocate and extend the centre have failed due to lack of

finance. No consideration has been given to the cumulative effect on services of developments planned for both Elswick and neighbouring Wyre villages. Over 300 homes are planned in the villages of Little Eccleston, Great Eccleston, Elswick and Inskip. Two cars are a necessity for every household in Elswick. A recent Parish plan survey recorded that there is an average of 1.5 cars per household in the village. Large housing developments are required to have 30% affordable housing. This would not be viable in Elswick with the lack of public transport and the need for households to have more than one car. 140 households would require at least 200 cars and 4 to 5 hundred extra car journeys per day most of which would have to cross or join the A585 at Thistleton junction. This would increase waiting times and exacerbate the serious risks at this already dangerous junction. There is no dial a car or dial a bus scheme in Elswick or surrounding villages. There is little demand for property in Elswick. Homes are simply not selling with several on the market for two years. Only five of the new homes on the new housing estate in the High Street have been sold despite being on sale for over 12 months. There is no industry or employment close to Elswick. Most people are employed in Blackpool 10 miles away.

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

- *A large housing estate surrounding the village would completely destroy the character and appearance of Elswick.*
- *The nearest primary school which is located on Copp Lane is full from having to accommodate children already living within Elswick and each new development results in the number of pupils increasing. There are two small primary schools in Great Eccleston but these will see an increase in numbers when the new housing estate is built around Great Eccleston. The nearest High Schools are located in Kirkham, Poulton-le-Fylde, Garstang, Preesall and Blackpool.*
- *All of the available land for development in Elswick has been or is currently being built on.*
- *There are no employment opportunities in Elswick. The majority of working age residents that live in Elswick travel to Preston, Blackpool, Kirkham, St Annes or beyond for work. The major employer, BAE Systems at Warton is in decline with sustained and recurring redundancy programmes.*
- *The Windy Harbour road widening around the lights has done nothing to alleviate traffic congestion. Bonds Lane and Mill Lane are far too narrow to take any further increase in traffic. The nearest petrol filling stations are in Greenhalgh and Singleton. This means a special journey out of the village, miles away from Elswick. Both of these filling stations are located on busy main roads that cause further traffic chaos.*
- *The electricity supply and sub-station would need a major up-grade to serve new housing development in Elswick. There is currently a noticeable reduction in the voltage at peak times causing lights to dim and appliances to work less efficiently.*
- *Despite the installation of fibre optic cable, broadband access is still slow due to demand on the local network.*
- *The proposed allocation of 140 homes in Elswick would have an effect on wildlife, especially in and around field ponds.*

- *There would be years of noise, dust, heavy construction traffic and inconvenience whilst the site was being built and an end result of loss of privacy, light, peace and a great strain on local services and infrastructure.*
- *There are overhead power cables along both sides of Bonds Lane and Mill Lane.*
- *If Fracking goes ahead, with Cuadrilla submitting applications for 91 seismic monitoring sites, the traffic congestion around the village would be horrendous, even before the development of any new homes. This will also discourage people buying new homes in the area.*
- *The Parish Council's Neighbourhood Development Plan would not necessarily represent the views of Elswick's residents.*
- *Development should be focussed on Kirkham. Kirkham has good public transport facilities including main line railway access and reasonable links to Blackpool, Preston and the motorway network. It makes less sense to extend Elswick village than it would to build the proposed 140 homes on any field closer to Junction 3 of the M55. They would be closer to the facilities that Kirkham has to offer and also closer to those of Lytham and St Annes. Inevitable development around the larger settlements can only enhance the sustainability of those settlements. Alternatively, development should be focussed in Blackpool: There are many other more suitable previously developed land development opportunities in Blackpool which desperately requires further investment / affordable housing and which already offers established infrastructure and local amenities. Run down areas should be regenerated where there are already homes which could be renovated, which are near to towns and businesses. Any new housing in Fylde should be provided on previously developed land.*

Paragraph 7.78 and 7.86 - Newton

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

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

issue of coalescence between Kirkham and Newton was recognised. The landowner claims that the site is sustainably located and well contained by existing development and natural boundaries. The site is available and deliverable now, could help contribute towards a five year housing land supply in the short term, to support deliverability and flexibility of the Local Plan and therefore, the site should be allocated as a non-strategic location for housing.

*A landowner owns the land forming the western part of the proposed housing allocation for 29 homes, identified as Land to the rear of Cobweb Barn, Oak Lane, Newton in the RPO version of the Local Plan. The same landowner also owns the rectangular area of land of approximately 2.1Ha located to the rear of their property and immediately south of the proposed allocation. The landowner requested that the additional area of land be included as an extension to the proposed housing allocation for 29 homes, to form a larger and more beneficial opportunity for sustainable new housing development to take place within Newton. As a Tier 1: Larger Rural Settlement, Newton is a sustainable location for growth and has the physical and social infrastructure to support appropriate additional housing, as well as being an attractive residential area for both working families and retired and older people. There is acknowledged market interest in Newton and the land could be made immediately available so that it offers the potential for development to be delivered in the early Years 5 - 9 of the plan period. It is not clear why the additional area of land was excluded from the proposed allocation as the majority of it is included in the larger site (**site ref. NE06**) identified in the SHLAA in 2012 indicating it is developable. It was consequently not submitted to the Non-Strategic Call for Sites earlier in 2015 and so the current consultation provides the first opportunity for the matter to be brought to the attention of the council and for the anomaly to be rectified by revising the boundary of the proposed housing allocation. The original larger site (**site ref. NE06**) identified in the SHLAA, extended north up to Blackpool Road (A583) and this was scaled back to the line of the double hedgerow marking the northern boundary of the proposed housing allocation, to prevent erosion of the proposed Area of Separation (draft policy **GD3**) between Kirkham and Newton. The Sites Assessments Background Paper (October 2015) confirms that the further promotion of the land to the north (identified in the Non-Strategic Call for **Sites Refs. 107 and 111**) has been rejected as it falls within the proposed Area of Separation. The proposed extension lies to the south of the proposed allocation and therefore will not adversely impact on the proposed Area of Separation. The site, comprising a small paddock, a timber stable building and a sand menage (included within SHLAA **site ref. NE06**) is available, suitable and achievable and provides an enhanced opportunity to provide new housing in Newton. The opportunity to secure an enlarged housing allocation would provide a far more certain prospect of delivery than alternatively leaving the land as greenfield land within the proposed extended settlement boundary for Newton (which would follow Parrox Lane and the northern boundary of the proposed housing allocation). An enlarged housing allocation would form a logical rounding-off of development within this part of Newton, enclosed by the road network and existing development. The situation is paralleled by the revision to the boundary of Newton Hall Farm where land nominated via the Call for Sites (**site ref. 94**) is proposed for inclusion in the draft Local Plan together with the farmhouse and buildings, as it forms a natural rounding-off of development along the southern boundary at Newton. The same conclusion must logically be drawn in respect of land on the western boundary of Newton, on a lesser scale.*

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

A number of residents wanted no development at all in Newton, but others claimed they were not against, in principle, accepting new housing on the sites proposed as long as all that could be done to maintain the physical character and heritage of Newton and retain existing features including hedgerows and trees. Any development should ensure the style and type of the new homes adjacent to the current buildings are sympathetic with their style and type. The style and type of homes proposed should be in keeping and include detached homes, bungalows and semi-detached homes sufficiently spaced apart. Notwithstanding this, there is a need to consider incorporating a proportion of homes dedicated as starter homes/low cost housing. Local people, who wish to down-size and stay local, could be given the opportunity to do so if the proposed sites had a range of property sizes. There is no certainty that there will be demand for these new homes as newly built properties in Warton have not sold and seem to have been reduced in price to attract purchasers. Newton needs a more appropriate and suitable play and park areas to encourage youngsters to use them rather than loiter in the streets. More housing will bring more loitering and youth nuisance factors hence the need to have a suitable local open area. The proposed developments at two sites in Newton, potentially amounting to 230 additional cars, would generate traffic congestion and highway safety issues, especially along the primary route – Bryning Lane - in and out of the settlement. The road infrastructure is already overloaded. At peak times traffic already backs up from the traffic lights at Blackpool Road down Bryning Lane. Thames Street is full of potholes, unsuitable for any form of vehicles and it is liable to flooding. Newton Bluecoat Primary School and Treales Primary School are near to capacity. The expansion of the Newton Bluecoat Primary School would further exacerbate the traffic congestion and parking problems already experienced during school drop-off and pick up times. Any additional pupils would need to travel from Newton to attend schools in Kirkham. The nearest health centres are located in Kirkham and these are over-stretched; and residents have to travel to Lytham or Preston for NHS dental treatment. Significant enhancement to health services must be required as a pre-requisite to any further development. If the two allocated sites were developed it would place additional demand on the ageing surface and foul water infrastructure. There is limited drainage and sewage utilities and it is subject to frequent flooding. The electricity supply to Newton is also unreliable, with numerous occasions over the last ten years when the electricity supply has been cut off.

Paragraph 7.79 - Staining

*A landowner commented that planning permission has been granted for 113 homes in Staining. There is also an allocation for 28 homes. This equates to 141 homes to 2032. The allocation for 28 homes is identified on the Staining Inset Plan 22 and the Assessment of Strategic and Non-strategic Sites (October 2015) as **site ref. 138** Land at Thornfield Holiday Camp, in Staining. However, the Assessment of Strategic and Non-strategic Sites concludes that: 'This site is NOT included in the Local Plan. Staining is a Tier 1: Larger Rural Settlement*

*and already has a commitment for 113 homes. There is no need for further allocations at Staining'. The Assessment of Strategic and Non-strategic Sites has conflicting evidence as **site ref. 140** Land at Chain Lane, opposite Community Centre, Staining concludes: 'This site be taken forward as a proposed allocation in the Revised Preferred Option. **Site ref. 140** does not appear as a proposed allocation'. It is understood that this is an error and will be corrected at a future stage. This questions the validity and pre judging of the site allocations for Staining and is contrary to the Framework. The starting point for consideration of the emerging Local Plan is the well-established principle embodied in Paragraph 158 of the Framework that Development Plans must be based on adequate, up-to-date and relevant evidence. The submissions and especially **site ref. 138** indicate that the council has failed to demonstrate a robust evidence base in preparing its Development Strategy and Site Allocations. The NPPG deals with deliverable sites as follows at Paragraph 031 (Reference ID 3-031-20140306): 'Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years. However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up-to-date evidence to support the deliverability of sites, ensuring that their judgments on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe. The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.' The Council has provided no information to justify the allocation or confirm consideration of potential alternative sites such as additional housing land at King Close adjoining the consented scheme for (LPA Ref: 13/0590 OL / Appeal decision APP/M2325/A/14/2220410). The Strategic Housing Land Availability Assessment (31st March 2012) does not include the majority of the allocated site and the land adjacent to 229 Staining Road (SHLAA **site ref. ST06**) is confirmed as Not Deliverable. This conflicts with the assessment of **site ref. ST08** Land east of Staining which is concluded to be 'Developable'. Consequently it is considered that the allocation for Staining and the Development Strategy does not currently contribute to the achievement of sustainable development contrary to Paragraph 151 of the Framework and Section 39(2) of the Planning and Compulsory Purchase Act and that it will not be found sound upon independent examination.*

*A developer has an interest in land (SHLAA **site ref. ST08** / Call for **site ref. 140**) on the eastern edge of Staining and considers this should be included in the Local Plan as an additional housing allocation. There is strong market interest in Staining and the developer is committed to bringing the site forward and delivering a scheme of approximately 30 homes in the short term in Years 5 - 9 of the plan period. The proposed allocation for 28 homes referred to in paragraph **7.79** and **Table 3** of the draft Local Plan, and shown on proposed Inset Map 22, relates to Thornfield Holiday Camp at Castle Lane, Staining. This is a large, occupied residential mobile home park that will not be available for development in the near future, does not benefit from planning permission for housing redevelopment and cannot be guaranteed to come forward during the plan period. The proposed housing trajectory estimates that homes could be delivered on this site from 2020 but this is far from certain and the site should*

therefore be de-allocated and added to the future windfall allowance. The Thornfield Holiday Camp site is identified as **site ref. 138** in the Sites Assessments Background Paper (October 2015). The assessment at page 42 states: 'Land at Thornfield Holiday Camp, Staining (residential, employment, retail, community facilities, sport / leisure and tourism) (**site ref. 138**). This site is NOT included in the Local Plan. Staining is a Tier 1: Larger Rural Settlement and already has a commitment for 113 homes. There is no need for further allocations at Staining'. **site ref. 140** in the Sites Assessments Background Paper and the assessment for that, at page 40, states: 'Land at Chain Lane, opposite Community Centre, Staining (residential, employment, retail, community facilities, sport / leisure and tourism) (**site ref. 140**). This site be taken forward as a proposed allocation in the Revised Preferred Option'. The Thornfield Holiday Camp site also does not appear to be included in the SHLAA, although the frontage buildings and a small part is within **site ref. ST06** which was assessed as being 'not currently developable', whereas the land at Chain Lane opposite the Community Centre is included as part of **site ref. ST08** and is assessed as 'developable'. A part of **site ref. ST08** identified as Land to the east of Kings Close, has also received planning permission for the erection of 30 homes that was granted on appeal (APP/M2325/A/14/2220410) on 8th October 2014, confirming the land is deliverable. Therefore, there is uncertainty whether the proposed site allocation at Thornfield Holiday Camp is intended to appear in the draft Local Plan or not (as the supporting evidence base appears to suggest). The land at Chain Lane, opposite the Community Centre (**site ref. 140**), should be included in the Local Plan as an additional housing allocation, or alternatively, as a substitute for the currently proposed allocation at the Thornfield Holiday Camp, which should be deleted.

Paragraphs 7.80 and 7.86 – Wrea Green

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

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

A developer objected to the policy wording for housing delivery in Wrea Green claiming it was vague and did not identify whether or not additional housing would be appropriate or whether or not this number should be expressed as a minimum. Given that the overall target for Fylde is expressed as a minimum, then any target for housing in Wrea Green should also be expressed as a minimum. In addition, having a rigid number based on permissions that have already been granted may not allow the LPA the flexibility to adapt to rapid change as required by the Framework. The policy wording for the delivery of housing in Wrea Green should be expressed as a minimum. In addition, the policy wording should state that the number may be exceeded to help meet the housing needs of the area. The developer also suggested that the housing target figure for Wrea Green be increased to 200 homes to allow any newly arising

needs for open market, affordable and specialist housing to be met over the plan period whilst allowing the LPA to adapt to rapid change. In light of the above, it was suggested that the Local Plan address Wrea Green as follows: 'Wrea Green will accommodate a minimum of 200 homes over the plan period. This figure shall include existing commitments for 150 homes as shown on the proposals map. Proposals for additional housing development in or adjacent to Wrea Green will be considered in the context of the presumption in favour of sustainable development. The Neighbourhood Plan for Wrea Green may allocate sites for new housing development, but any housing proposed in the Neighbourhood Plan must not be less than that proposed in the Local Plan in accordance with National Planning Policy. However, the Neighbourhood Plan may allocate more land for housing development should the body promoting the Neighbourhood Plan consider additional housing growth above the Local Plan target to be appropriate.'

To accommodate additional housing growth in Wrea Green, an additional housing allocation was proposed by the developer on land to the North of Mill Lane. Pre-application discussions have already been held with the LPA regarding this site, and the Highway Authority has confirmed that the site can provide a suitable access. The landowner is also willing to bring forward the site for development, and as such, the site is considered to be both deliverable and available for development. Some concerns have been expressed about potential landscape impact, however the site is visually well contained and is viewed in the context of the existing settlement. The site has strong perimeter landscaping that would be retained as part of any development proposal. The SHMA and local housing surveys that have been carried out confirm that there is a prevalence of large detached homes in Wrea Green, and a more limited number of smaller starter homes and retirement properties that older residents could downsize to, which would free-up family housing to younger generations. As such, the land at Mill Lane could provide for a mix of house types and sizes to accommodate a range of identified local housing needs. Otherwise, the site is sustainably located and is located within walking distance of a number of amenities including a primary school, public house, church, shop (with post office) dental surgery, hairdressers, village hall, cafe, restaurant and an employment estate. Wrea Green is served by a frequent bus service (number 61) which runs between Blackpool and Preston. There are no constraints to the delivery of this site for housing. The development of this site would bring about significant social and economic benefits which weigh heavily in favour of a proposed allocation for housing, and would boost the sustainability of existing services in the settlement.

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

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

Paragraphs 7.81 and 7.86 - Clifton

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

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

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

Council response

Paragraph 7.75

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

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

Paragraphs 7.76, 7.77 and 7.86 - Elswick

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

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

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

Paragraphs 7.78 and 7.86 - Newton

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

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

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

The council notes the objections raised by an Action Group and 14 residents to the allocation of two sites in Newton to accommodate up to 115 homes, on Land at Newton Hall, on School Lane and at Cobweb Barn, on Oak Lane. The council considers that Newton is a Tier 1: Larger Rural Settlement – as identified in the Settlement Hierarchy Background Paper – and is capable of accommodating between 100 and 150 homes over the lifetime of the Plan.

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

Paragraphs 7.79 and 7.86 - **Staining**

The council notes a landowner's and a developer's objections to the inclusion of Land at Thornfield Holiday Camp, Staining, which was submitted during the Call for Sites in January / February 2015 (**site ref. 138**). The council considers that the site should be included as an allocation in the Local Plan as it constitutes the re-development of previously developed land. The council disagrees with the developer that Land at Chain Lane, opposite Community Centre, Staining, which was submitted during the Call for Sites in January / February 2015 (**site ref. 140**) should be included in the Local Plan (see map at back of the Responses Report). The council considers that the inclusion of the site, adjoining the settlement of Staining, would

result in an unsustainable amount of development, adversely affecting the size and scale of the settlement. The council notes the comments made about the sites in the SHLAA (31st March 2012). The council intends to issue the latest SHLAA – based on 31st March 2015 figures – alongside the Publication version of the Local Plan, together with an updated version of the Sites Assessments Background Paper. The council will provide robust, up-to-date evidence – with the Publication version of the Local Plan - to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

Paragraphs 7.80 and 7.86 – Wrea Green

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

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

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

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

Paragraphs 7.81 and 7.86 – Clifton

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

The council notes a landowner's request for the allocation of Land off Clifton Lane, Clifton for up to 99 homes in the Local Plan. The site was submitted during the Call for Sites in January /

February 2015 (site ref. 43) for a range of uses comprising *residential, employment, retail, community facilities, sport and leisure* (see map at back of the Responses Report). The council did not include the site in the Local Plan. Inclusion of the site would result in an unsustainable amount of development at Clifton, adversely affecting the size and scale of the settlement.

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

Recommendations for change

- Amend paragraph 7.77 of the RPO version of the Local Plan to read: 'In Elswick, a Neighbourhood Development Plan will allocate a suitable site(s) to provide 50 ~~140~~ homes over the plan period, in addition to the existing ~~plan period~~ commitments. Improvements may be required to the existing A585 Thistleton junction to improve safety and accessibility'.
- Amend paragraph 7.80 to include the up-to-date list of commitments in Wrea Green.
- Amend **Table 3** after paragraph 7.86 by converting it into a new policy: '**SL5: Development Sites outside the Strategic Locations for Development**'.
- Delete 'Elswick' from the list of Tier 1: Larger Rural Settlements and add 'Elswick' to the list of Tier 2: Smaller Rural Settlements. Reduce the number of homes allocated in the policy for Elswick from '140' to '50 (Neighbourhood Plan allocation)'.
- Add a new paragraph to accompany the policy: 'Policy SL5 confirms the number of homes proposed to be completed outside the Strategic Locations for Development over the lifetime of the Local Plan. The council has prepared a Settlement Hierarchy Background Paper which assesses and services and facilities in each settlement. The Background Paper includes Tier 1: Larger Rural Settlements which, the council considers could accommodate between 100 and 150 homes over the plan period; and Tier 2: Smaller Rural Settlements which could accommodate up to 50 homes over the plan period.'
- The council will continue to provide robust, up-to-date evidence – with the Publication version of the Local Plan - to support the deliverability of sites, ensuring that judgements on deliverability are clearly and transparently set out.

Additional recommendations for change

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

Additional textual changes

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

Chapter 8: General Development Policies**Chapter 8: General Comments****Number of representations:**

Comment	Support	Object	Total
0	0	0	0

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

Recommendations for change

- None

Policy GD1: Settlement Boundaries**Number of representations:**

Comment	Support	Object	Total
8	0	7	15

Representations received from:

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

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

What you said

Highways England refer to the additional wording which allows for the loss of the best agricultural land if there is a requirement for sites allocated in the Plan or the land is required for strategic infrastructure. They consider this amendment should not present any particular concern for Highways England.

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

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

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

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

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

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

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

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

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

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

Council response

The council acknowledges Highways England's comments.

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

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

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

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

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

The council notes the comments made by the Action Group.

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

Recommendations for change

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

Additional recommendations for change

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

Additional textual changes

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

Policy GD2: Green Belt

Number of representations:

Comment	Support	Object	Total
3	1	2	6

Representations received from:

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

What you said

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

designated areas development of previously developed land and surplus employment land should be maximised.

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

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

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

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

Council response

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

The council notes CPRE – Fylde District's comments.

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

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

exceptions listed within the Framework, which this development does not fall into, and as such is contrary to national policy.

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

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

Policy GD3: Areas of Separation

Number of representations:

Comment	Support	Object	Total
7	5	8	20

Representations received from:

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

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

What you said

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

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

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

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

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

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

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

Council response

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

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

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

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

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

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

The original Area of Separation boundary between Wrea Green and Kirkham has been altered following an appraisal by the council's Urban Design Officer. A small area of land was removed and the boundary changed to follow the natural tree line. As the boundaries had not yet been formally adopted there was no legal need to consult with either residents or statutory consultees.

Recommendations for change

- None



Additional recommendations for change

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

Additional textual changes

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

Policy GD4: Development in the Countryside

Number of representations:

Comment	Support	Object	Total
4	1	4	9

Representations received from:

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

What you said

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

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

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

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

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

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

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

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

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

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

Council response

The council notes Highways England’s comments.

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

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

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

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

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

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

Recommendations for change

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

Policy GD5: Large Developed Sites on land outside settlement boundaries

Number of representations:

Comment	Support	Object	Total
3	0	1	4

Representations received from:

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

What you said

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

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

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

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

Council response

The council notes Highways England's comments.

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

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

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

Recommendations for change

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

Additional recommendations for change

The following additional changes were proposed to clarify and update the existing text in Chapter 8 of the RPO version of the Local Plan.

Additional textual changes

Amend the first paragraph of policy **GD5** to read: 'The complete or partial re-development of large developed sites in the Countryside', including but not restricted to the Universal Products Factory at Greenhalgh; ~~the Arvin Exhaust Site~~ Helical Technologies Ltd at Hillock

Lane, Warton; the BNFL Site at Salwick; the Naze Lane Industrial Estate at Freckleton; Weeton Barracks Camp; HM Prison Kirkham; Mill Farm Sports Village, Fleetwood Road, Wesham; and Ribby Hall Village, all of which are identified on the Policies Map, will be permitted subject to the following criteria:

Amend the first sentence of paragraph **8.14** to read: ‘There are a number of large developed sites in open land outside settlement boundaries’ within Fylde, such as Weeton Barracks Camp, HM Prison Kirkham and Ribby Hall Village. There are also existing employment sites including the Universal Products Factory at Greenhalgh, ~~the Arvin Exhaust Site~~ Helical Technologies Ltd at Hillock Lane, Warton, Westinghouse Springfields in Salwick, and Naze Lane Industrial Estate at Freckleton.’

Policy GD6: Promoting Mixed Use Development

Number of representations:

Comment	Support	Object	Total
3	1	0	4

Representations received from:

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

What you said

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

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

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

Council response

The council notes Highways England’s comments.

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

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

Recommendations for change

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

Additional recommendations for change

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

Additional textual changes

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

Policy GD7: Achieving Good Design in Development

Number of representations:

Comment	Support	Object	Total
4	1	9	14

Representations received from:

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

What you said

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

Lytham St Annes Civic Society commented that this policy should be used to ensure that developers do not roll out standard house types, all of which are inappropriate particularly in Lytham.

CPRE – Fylde District made comments relating to advertisement consent in rural areas.

The Home Builders Federation, a developer and a landowner, questioned a number of elements within the policy in particular criteria m) and p), as it states that the government have specifically identified that these two elements should be dealt with via Building Control and that the council cannot require developers to go beyond these regulations.

In addition, a developer suggested that the words ‘where possible’ should be added to the beginning of criterion t) in relation to Public Open Space, and that the text should read ‘off site’ rather than ‘on site’ at the end of the paragraph.

The Action Group made various comments, the majority of which are related to past planning decisions in Wrea Green.

A resident commented that the term cycleways of a ‘high quality’ is repeatedly used. However, these standards have not been defined, and as such we could have cycle routes and pathways not fit for purpose. In addition, ‘appropriate measures’ are provided... there needs to be a definition or this point has no value, a simple white line or shared environment is not appropriate, if these policies are left with no weight behind them then nothing will be achieved.

Council response

The council notes the comments made by Highways England and Lytham St Annes Civic Society.

The council notes CPRE – Fylde District’s comments which have been dealt with under the responses to policy **GD4** above.

In response to the Home Builders Federation and developer's comments the council has reviewed the latest Housing and Standards Review and ministerial statement dated 25th March 2015, and consider that information contained in this encourages council's to use this set of standards, which complement the existing set of Building Regulations, which are mandatory.

The council disagrees with a developer that the addition of 'where possible' at the beginning of criterion t) in policy **GD7** is required, as the paragraph goes on to say *unless it is agreed by the council...etc.* However, the council agrees that the final wording should state 'off site' rather than 'on site'.

The council notes the Action Group's comments.

The council notes the resident's concerns about cycle paths, but does not consider that further details in relation to cycle path standards need to be defined. Each planning application submitted would be assessed on its own merits and the relevant statutory body consulted to ensure the development was designed and built to the correct specifications and fit for purpose. Cycle provision is set out in detail in **section 2** of the **Infrastructure Delivery Plan** (IDP) and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17.

Recommendations for change

- Amend text in part t) to read 'off site' rather than '~~on site~~'.

Additional recommendations for change

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

Additional textual changes

- Add a new criterion to policy GD7: 'Secured by Design principles should apply to all new developments.'
- Add the following text to the end of criterion g) in policy GD7: 'and using sustainable natural resources where appropriate.'
- Add the following text to existing criterion k) in policy GD7: Protecting existing landscape features and natural assets as an integral part of the development; requiring

multi-functional green infrastructure to be integrated into urban areas; providing enhancements to open spaces to encourage people to use them;

- Amend existing criterion m) in policy GD7 to read: ‘All new ~~housing developments~~ homes should comply with all relevant design and quality codes in the National Technical Standards.
- Add a new criterion under Highway Safety in policy GD7: ‘The needs of non-motorised users, such as pedestrians and cyclists, should be prioritised over other road users, through design measures.’
- Add a new criterion and sub-heading in policy GD7: ‘Waste Management - Local waste management facilities and neighbourhood waste management facilities for the separation, storage and collection of waste, should be provided to increase the efficiency of its subsequent re-use, recycling and treatment.’

Policy GD8: Demonstrating Viability

Number of representations:

Comment	Support	Object	Total
1	1	2	4

Representations received from:

- Bryning with Warton Parish Council
- 1 Landowner
- 1 Developer
- 1 Action Group

What you said

*Bryning with Warton Parish Council supported policy **GD8** in principle but suggested that the council works closely with users of the Enterprise Zone to ensure future employees do not drive through the centre of Warton.*

The developer and landowner both consider the policy to be unsound as it places far too onerous and unjustified restrictions on the developer, and consider a 12 month period is unnecessary and contrary to the Framework.

The Action Group referred back to a specific planning application in Wrea Green and questioned sustainable locations.

Council response

The council notes Bryning with Warton Parish Council's comments.

The council will clarify and update the existing text, removing the text referring to a 12 month period.

The council notes an Action Group's comment but considers they are not relevant to this consultation process.

Recommendations for change

- Review the text in regards to viability as discussed under policy **GD7** and the comments made by BAE Systems Real Estates Solutions.
- Delete the following words from criteria a) and b) in policy **GD8**: ~~'Following a 12 month marketing exercise'~~ and delete ~~'appropriate'~~ from criterion c).

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text and make policy **GD8** more robust and fit for purpose, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add cross references to other policies in policy **GD8** (i.e. leisure, culture and tourism policies).

Chapter 9: The Fylde Economy**Chapter 9: General Comments**

Number of representations:			
Comment	Support	Object	Total
9	0	6	15 ³³

Representations received from:

- Lancashire County Council
- Treales Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- CPRE - Fylde District
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Landowner
- 1 Resident

What you said

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

Treales Roseacre and Wharles Parish Council noted the Growth Accelerator programme has been deleted from the support portfolio of the UK Government.

Treales Roseacre and Wharles Parish Council have made detailed comments on paragraph 9.8 – Fylde Coast Energy Hub. These comments are duplicated under Chapter 3 in relation to the Local Plan Vision for Fylde and Strategic Objective 4 in Chapter 4. They objected that there was no evidence presented that supports a Fylde Coast Energy Hub. There has been a world-wide supply chain for energy for decades. Fylde companies already address this. The aviation support activities at Blackpool Airport to service the offshore wind and gas industry are well established. The geographical aspects of the marine off-shore support industry are principally located around Heysham. Fleetwood proposes further development. Neither of these fall within Fylde's remit. There is no evidence presented why companies would elect to locate additionally in the Fylde. Even Cuadrilla have already shown that their preference is to locate in Central Lancashire. Commodity based economies are highly sensitive to external conditions outside the control of the area. Arup have assessed in the Roseacre Wood and Preston New Road applications that shale gas produces a total of 11 equivalent jobs during the exploration and appraisal site throughout the national/international supply chain. LCC indicate that few

of these jobs will be sourced locally. The introduction of heavy industrial activity in the rural areas will have adverse impacts on the amenity and other economies of these areas.

Treales, Roseacre and Wharles Parish Council commented that if shale gas development is assumed to be in the rural areas, then this needs to be included in all references about impacted other components of the economy including the visitor, residential, retirement, leisure, food production and inward investment economies. If the Fylde area is prospectively less attractive and less healthy than other areas, then stakeholders will select other choices. It is not apparent that FBC has commissioned its own up to date research to assess the impacts.

As part of their response, Treales, Roseacre and Wharles Parish Council, raise specific questions as follows:

- What is FBC's Governance regime over The Blackpool Wyre and Fylde Economic Development Company? How is it directed by FBC and how is its outputs considered with what weight?*
- Does the EDC anticipate future fracking sites at the energy hub?*
- There is no appraisal of any other sites, so why would there be a requirement for an energy equipment store?*
- Paragraph 9.8 refers to a study when was that commissioned, by whom and when was it supposed to produce its findings?*
- What is the evidence base for the requirement for an energy logistics park? This sounds like a big equipment store?*
- Is this an activity that fits within the Fylde vision? What is the evidence base for an energy hub?*
- Alternatively, would exploration and appraisal hub (fracking) sites be encouraged at the Blackpool EZ site or other Fylde locations on the coast? Is Blackpool Council supportive of this or would they prefer to encourage exploration and appraisal site development within their own authority boundary?*

Treales Roseacre and Wharles Parish Council noted the historical demand for 2.7 Ha of employment land per annum. They go on to question what employment does that generate per Ha and how does that compare with the requirement to generate 6000 new high value added jobs at the Warton and Samlesbury LEZ sites plus a further 5000-7000 indirect jobs? This should be consistent or an additional action should be identified to facilitate the achievement of the economic development objectives.

Bryning with Warton Parish Council; CPRE - Fylde District; and a resident expressed concern at the methodology used in the calculation of the needs of the Borough reliant on the Fylde

Employment Land and Premises study 2012. They all believe the requirement for new employment land in Fylde is overstated.

Bryning with Warton Parish Council stated that from the evidence of unoccupied vacant sites, such as at Westby, throughout the Fylde that the need is greatly reduced from that assessed. The reduced needs of employment Land proposed would assist the reduced need for residential development on Green fields land.

CPRE - Fylde District raised comments specifically in relation to paragraphs 9.9-9.12. The oversupply of land for employment use has the knock-on effect of precluding such land being used for housing. This may 'wrongly' justify further allocation of housing on greenfield sites. They go on to make comment about the AECOM/BE Employment Land and Premises Study (Reference 8) published in August 2012. The Study presents a range of 7 models to predict the quantity of employment land required, and only the largest of the predictions, based on historic trend, is recommended. They shared the concerns about the Study expressed in the Employment Land and Premises Minority Report produced by independent councillors. (Reference 9).

We are now concerned that the total employment land required has increased from the Preferred Options, albeit partly due to the extension of the Plan Period from 2030 to 2032:

Preferred Options:

*26 ha of additional employment land proposed by the Study
+7.5 ha to compensate for loss off the Heyhouses DWP site to housing
+15 ha to satisfy Blackpool employment land needs
Total 48.5 Ha*

RPO net requirement:

*52.3 Ha for a 21 year Plan (2.49 x 21)
- 2.2 Ha new since 2011 start of the Plan
-7.7 Ha with permission or under construction
+ 14 Ha for 'Blackpool's requirement up to 2027'
Total 56.5 Ha (56.3 in policy EC1)*

The RPO states (paragraph 9.9) If long term trends continue, the study recommends that Fylde Council will need to cater for an expected annual take-up of 2.7 Ha rolled forward to the end of the Local Plan period. This historic take-up figure has been corrected to exclude sui generis development. Consequently, the annual average take-up rate of 2.49 Ha for Fylde results in a requirement of 52.3 Ha for the plan period. CPRE – Fylde District is not aware of the evidence for this correction and without such evidence queries whether it is justified from a 'soundness test' perspective. Can the Council please provide details as to where the calculation for this correction came from?

A resident raised a number of objections to this section at 9.1, 9.3, 9.5 and 9.9 as follows:

9.1 This flawed conclusion results from a failure to recognise the movement of employment land across the Borough (leading to some requirement for new sites) and the total employment land in use (reducing steadily over the last 20 years).

9.3 *This statement of economic growth is inconsistent with some of the economic reports commissioned by the Borough. In fact some records of Fylde's economic performance show periods of relative decline regionally. Suggest you check your figures.*

9.5 *This is highly misleading. Even if the Warton EZ performed as hoped, it would barely cover the planned and expected job losses at Warton's BAE System's site. In fact performance of the EZ (in creating jobs) has been spectacularly unsuccessful to date.*

9.9 *The previously mentioned flawed conclusions that have been drawn from this study, have never been satisfactorily answered.*

*In addition to the above CPRE - Fylde District disapproves of the lack of a specific policy for the rural economy. (We had commended such a policy **EC3** in the Preferred Options). After all, in terms of the constituency of Fylde 84% is countryside, 10% of which is Green Belt and the other 72% is unprotected countryside (based on March 2015 DCLG data).*

It is recommended that a specific Policy for the Rural Economy is re-instated to address the following RPO statements:

- **2.62** *Agriculture and agricultural diversification (including energy crops), is an important industry for the Fylde rural economy, despite undergoing considerable change in recent years.*
- *Strategic Objective 2: To maintain, improve and enhance the environment by 7) Protecting significant areas of best and most versatile agricultural land.*
- *Strategic Objective 4: To diversify and grow the local economy by 10) Supporting and protecting agricultural and farming operations as a key element of the local economy.*
- *The policy for the rural economy must also ensure that the Council seeks to ensure that the loss of any agricultural land is kept to a minimum, and that new development is not located or designed in such a way as to create unnecessary conflict between urban fringe development and farming operations. (cf. Local Plan Policy EP22).*

*The Blackpool, Fylde and Wyre Trades Union made comment in relation to paragraph **9.8**. They welcome new development in the Fylde, including new homes and jobs and strongly support the emphasis on sustainability. The plan should therefore not include any extension of fossil fuel extraction via the shale gas method.*

*A landowner made comment in relation to paragraph **9.9** and in so doing referenced paragraph **7.69** which states that the Employment Land and premises Study also identifies that the allocation of some sustainable employment sites on the edge of settlements is necessary as there is limited capacity within the existing settlements for new employment development. The research identified eight possible broad areas of search where additional future employment land allocations might be delivered. The landowner goes on to suggest why their site, Corner Hall Farm, near junction 3 of the M55 could contribute towards the Borough's balanced portfolio of employment land allocations.*

Council response

In response to Lancashire County Council, the council will include a policy in Chapter 9 of the Publication version of the Local Plan, relating to the Blackpool Airport Enterprise Zone.

In response to Treales Roseacre and Wharles Parish Council, the council will remove the heading 'Local Growth Accelerator Strategy' and related paragraph **9.6**.

Treales Roseacre and Wharles Parish Council have raised a number of issues relating to the potential impacts of Shale Gas exploration in the borough. Shale Gas exploration and exploitation is a matter for consideration in the Minerals and Waste Local Plan prepared by Lancashire County Council who have commenced preparation of a Supplementary Planning Document on this matter. Counter arguments for and against shale gas exploration and its potential indirect impacts on the borough have been made. The industry in Fylde is in a pre-exploration phase, but if a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.

The specific questions raised by Treales Roseacre and Wharles Parish Council are each addressed in-turn below:

- *What is FBC's Governance regime over The Blackpool Wyre and Fylde Economic Development Company? How is it directed by FBC and how are its outputs considered with what weight?*

The first sentence of paragraph **9.8** sets out the current governance regime and details regarding the governance of the EDC is available on their website at: <http://www.bfwedc.co.uk/governance>. Further information is also included in an information item to the council's Development Management Committee, on 20 January 2016.

At the council's Development Management Committee, on 20 January 2016, it was resolved to ask Full Council to consider the governance/feedback arrangements of the Economic Development Company (EDC) and that an updated report be presented to committee in due course.

- *Does the EDC anticipate future fracking sites at the energy hub.*
The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.
- *There is no appraisal of any other sites, so why would there be a requirement for an energy equipment store?*
The level of information known about various potential development sites identified in the RPO varies. Where additional information is available, this has been reflected

in the RPO. In the Ministerial Statement³⁴ the Government conclude that ‘...Blackpool is to become the latest place to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector, boosting the local economy...The Minister said that the move would attract greater inward investment and help deliver hundreds of new jobs. It will also provide an opportunity to secure the long term future of Blackpool Airport.’ The statement goes on to say ‘The Blackpool Enterprise Zone will become a centre of excellence for the energy sector, with plans for a new Energy HQ, a dedicated new training facility to be developed by Blackpool and Fylde College. Backed by £6.2 million Growth Deal funding, it aims to provide job-ready students in engineering and advanced technology.’

The Development Management Committee, on 10th February 2016, planning permission was granted for the erection of a two storey college building at the site of the former airport terminal building (ref: 15/0811). This development will support energy businesses on the Fylde Coast.

- *Paragraph 9.8 refers to a study when was that commissioned, by whom and when was it supposed to produce its findings?*

Paragraph 9.8 does not actually refer to a ‘study’. Paragraph 9.8 does however refer to ‘investigating the creation of an energy hub’; and ‘initial planning of a logistics park’. In this regard, as drafted, it was referring to the Enterprise Zone bid for Blackpool Airport. The application for EZ status was co-ordinated by the EDC.

Paragraph 9.8 will be updated to reflect the most up to date position concerning EZ status and becoming a centre of excellence for the energy sector.

- *What is the evidence base for the requirement for an energy logistics park? This sounds like a big equipment store?*

The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this responses report.

- *Is this an activity that fits within the Fylde vision?*

The council considers that this is an activity that fits within the Fylde vision. Paragraph 4 of the Local Plan Vision states ‘...’ Fylde will have an energy hub, generating a cluster of energy based companies and amenities; together with an energy logistics park, close to Blackpool Airport, to support energy businesses on the Fylde Coast.’

Furthermore, the council’s Economic Development Strategy and Action Plan 2012 to 2030 (January 2013), also includes the following vision ‘The Council and its partners will work together to ensure that the economic opportunities created by Government energy policy are maximised in the Fylde’.

- *What is the evidence base for an energy hub?*
The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.
- *Alternatively, would exploration and appraisal hub (fracking) sites be encouraged at the Blackpool EZ site or other Fylde locations on the coast?*
This question has been forwarded to the Head of Enterprise and Investment Blackpool Fylde and Wyre EDC and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report as proposals relating to the exploration and exploitation of mineral resources are addressed in the Minerals and Waste Local Plan.
- *Is Blackpool Council supportive of this or would they prefer to encourage exploration and appraisal site development within their own authority boundary?*
This question has been forwarded to the Head of Development Plans and Projects at Blackpool Council and a separate response has been requested. It is considered that this matter falls outside the remit of this Responses Report.

In responding to Treales Roseacre and Wharles Parish Council's query about standard job densities, the Employment Land Study never 'squares up' land and jobs nor does the Local Plan. It forecasts land demand by using historic take-up to give a land based answer. It then considers economic modelling to give job forecasts where the impact of Warton Enterprise Zone was considered and gives indications about the likely future growth/decline of jobs. This job forecasting is repeated in the SHMA.

The Employment land and Premises Study was commissioned to provide robust evidence to underpin and inform the Council's Local Plan. It analyses employment land demand, supply and need to 2030. AECOM and BE Group were the consultants appointed to compile the report. It was carried out during 2012. The Study comprises five main elements:

- An assessment of the Borough's economy that informs the amount, location and type of employment land and premises required to facilitate its development and growth
- A review of the current portfolio of employment land and premises
- Identification and appraisal of additional potential employment land which could be used to meet the Borough's future land needs
- An assessment of the potential impact of major public and private sector development proposals, notably the Enterprise Zone at Warton
- Recommendations on the future allocation of employment land and premises to maintain the Borough's economic growth.

In September 2014, BE Group produced a briefing note to support and expand upon key issues raised by the Employment Land and Premises Minority Report produced by independent

councillors, in response to the Fylde Employment Land and Premises Study. It was been carried out on behalf of the council and covers the following key issues:

- Further explanation as to why historic take-up was chosen as the preferred method of forecasting Fylde's future land needs over the alternative, jobs change, methods
- The importance of the qualitative market analysis of the ELPS in understanding demand for employment land and premises
- Issues associated with land monitoring by the Council which are of relevance to ELPS findings
- BE Group's experience in preparing and delivering Employment Land Reviews.

This briefing note is available as part of the Local Plan's evidence base.

The historic take-up figure has been corrected so as to exclude the sui generis uses which were previously recorded. 3.36 Ha in 2008/2009 and 0.61 Ha in 2009/2010 have been discounted from the historic take-up rate 1989 - 2011. Essentially these figures comprise car dealerships in the Whitehills area.

The difference in the employment land requirement figure stated in the Preferred Option Local Plan and the RPO Local Plan is in part due the plan period being extended from 2030 to 2032. The RPO net requirement is 56.5 Ha. Policy **EC1** slightly under provides for this, allocating 56.3 Ha. The other salient point is that the Preferred Option Local Plan referred to additional employment land. This was land over and above the land allocated in the adopted Fylde Borough Local Plan. The RPO Local Plan does not net-off any existing allocations and all proposed allocations are baselined as forming part of the supply.

A background paper will be prepared which sets out detailed information relating to the employment land requirement – explaining why the historic take-up figure has been corrected to exclude sui generis uses.

In considering the possible inclusion of a specific Policy for the Rural Economy - this has been incorporated in policy **GD4**: Development in the Countryside in Chapter 8.

Blackpool Airport and adjacent land is to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector, boosting the local economy. It is, therefore, considered appropriate to include reference to the Fylde Coast Energy Hub in the Local Plan.

The council considered Corner Hall Farm (as **site ref.** 137) for the purposes of employment and retail as part of compiling the Site Assessment Background Paper, October 2015. It was NOT included in the Local Plan for a number of reasons all of which are considered to remain valid.

Recommendations for change

- Delete paragraph **9.6** and the sub-heading:
Local Growth Accelerator Strategy
~~9.6 A Local Growth Accelerator Strategy for the Fylde Coast is being developed by Blackpool, Fylde and Wyre Economic Development Company to support the co-ordinated development of future employment across the sub region. The Strategy will outline key areas for strategic growth within the Fylde Coast sub-regional economy that will enable focused investment to realise opportunities.~~
- Amend paragraph **9.8** to read: ‘Blackpool, Fylde and Wyre Economic Development Company, is owned by the three Fylde Coast Authorities (Blackpool, Fylde and Wyre), ~~together with Lancashire County Council,~~ with a board of directors from the public and private sectors. ~~The Economic Development Company (EDC) is investigating the creation of an energy hub on the Fylde Coast, building on 80 existing businesses within the energy sector, as well as the potential exploration for shale gas, to generate a cluster of energy based companies and amenities throughout the area. As part~~ of this initiative, the EDC is carrying out the initial planning of an energy logistics park, ~~close to Blackpool Airport, to support energy businesses on the Fylde Coast. The development of a diverse Fylde Coast Energy Sector has been identified by the EDC as one of its six key priority areas. The application for Enterprise Zone status at Blackpool Airport was co-ordinated by the EDC. The Enterprise Zone will become operational from 1st April 2016 and continue until 2037. The Blackpool Enterprise Zone will become a centre of excellence for the energy sector, with plans for a new Energy HQ, a dedicated new training facility to be developed by Blackpool and Fylde College. Backed by £6.2 million Growth Deal funding, it aims to provide job-ready students in engineering and advanced technology. Planning permission has been granted for the erection of a two storey college building at the site of the former airport terminal building. This development will support energy businesses on the Fylde Coast.’~~
- The Publication Version Local Plan will be drafted to include a new policy (policy number **EC4**), regarding Blackpool Airport Enterprise Zone, in Chapter 9,

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 9 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the sub-heading ‘Employment Land Provision’ to read: ‘Overall Provision of Employment Land.’

Policy EC1: Overall Provision of Employment Land and Existing Employment Sites

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Number of representations:			
Comment	Support	Object	Total
11	1	9	21 ³⁵

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- Blackpool Council
- Kirkham Town Council
- Bryning with Warton Parish Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- Newton with Clifton Parish Council
- Treales Roseacre and Wharles Parish Council
- CPRE - Fylde District
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Landowner
- 2 developers
- 4 Residents

What you said

*Highways England noted that this policy has been significantly amended since the previous draft. Overall, there has been an increase in employment land of 7.3ha, however this is consistent with the amendment to Policy **DLF1**. The overall distribution has also changed, including the following site amendments:*

***E4** - Land West of Fleetwood Road, Wesham (4ha mixed use) removed*

***MUS1** formerly **M1** - Land East of Cropper Road, Blackpool Periphery (11ha mixed use) reduced by 4.5ha*

***M3** - Land North of Blackpool Road, Kirkham or locally known as 'Kirkham Triangle' – (9ha mixed use) removed*

In addition a number of existing employment sites have now been specified in the policy. It was previously identified that a suitable evidence base was needed in order to consider the implications of such new development on the safe and efficient operation of the SRN; and that appropriate measures are identified to support the economic growth. Highways England, in September, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report'. It is not clear if any further evidence has been developed, beyond that initial assessment, which would enable Highways England to make

further comments on the Plan and its influences on the safe and efficient operation of the SRN. As stated in section 4.2 of the report, it 'intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions'. As such, it is considered that there is still a need to follow the 'Next Steps' presented in Figure 4.1 of the report in order to move forward.

BAE Systems Real Estate Solutions supported the policy in respect of 'Existing Employment Sites'. However, it would be useful if the plan would set out the process for reviewing the employment land supply to ascertain when it can be demonstrated that there is 'no reasonable prospect of the site being used for employment purposes'.

BAE Systems Real Estate Solutions objected to the fact that the RPO does not include the Policies Map that may show the changes to the boundaries of the existing employment sites. In this case of Warton Aerodrome the former GEC Marconi factory site which was included within the employment area is currently being developed for housing. It should therefore be removed from the employment area.

Blackpool Council noted that paragraph 9.12 sets out that 14 Ha of employment land to meet Blackpool's employment land requirement up to 2027 will be provided within Fylde Borough. This provision is welcomed and strongly supported. They also stated that for clarity, it would be useful if the housing and employment policy allocation numbers could be shown on the Inset maps, as they are not currently identified.

Greenhalgh Parish Council wished to see changes to the plan to limit expansion of development into the countryside through a limit of land allocations to meet Blackpool's employment land aspirations for popular town edge Greenfield land over their available brown-field sites.

CPRE - Fylde District commented that they have seen no evidence of the need to provide 14 Ha of land in Fylde 'to meet Blackpool's need up to 2027'. The employment land requirement, including the needs of Blackpool, ought to be revised by reviewing findings of the Study and the implications of the Warton Enterprise Zone and the new Blackpool Airport Enterprise Zone.

Medlar with Wesham Town Council questioned why are Fylde expected to provide land for Blackpool when there appears to be available previously developed land which could be used?

A resident objected about the amount of land allocated for employment which they say is inflated to accommodate the desires of Blackpool for greenfield sites adjacent to Junction 4. It is evident that brown-field sites within Blackpool can be made available as part of their need for the redevelopment of poor quality central areas and this would provide a more sustainable solution for both authorities. Blackpool's needs should be challenged rather than merely accepted. The large quantity of surplus land to be freed at the BAE plant at Warton should be taken into account, thereby saving significant areas of greenfield land.

Bryning with Warton Parish Council; CPRE - Fylde District; and a resident all made duplicate comments here and at paragraph 9.9. The each expressed concern at the methodology used

in the calculation of the needs of the Borough reliant on the Fylde Employment Land and Premises study 2012 and believe the requirement for new employment land in Fylde is overstated.

Medlar with Wesham Town Council questioned why Fylde requires an extra 17.3Ha compared with the original calculation of Fylde's needs in the Preferred Option document?

Newton with Clifton Parish Council had doubts relating to the employment land calculations. It is understood that Fylde is smaller than both Blackpool and Wyre and yet appears to have twice the employment land in its Local Plan as both Blackpool and Wyre combined.

Again members consider that this is aspirational rather than what is actually needed. If there are errors in Employment Land Policy then the Local Plan is unsound.

Historical land take up information should be used as a base and any identified over-supply of employment land could be released as and when considered appropriate for housing. More attention should be given to the two Enterprise Zones in Fylde which should provide high technology employment. The Local Plan does not evidence that land is released when businesses move on from existing sites to new locations and consequently free up their former sites for potential re-use by new businesses.

Fylde seems to have only counted newly deployed land and does not appear to have subtracted land released from use. There does not seem to be any recognition that working practice has changed dramatically in recent years i.e. home working, development in technology and c. As indicated previously large industries which underpinned employment opportunities in the Fylde have downsized considerably and land is still available for employment use on all those sites. Council welcomes the fact that employment figures in Fylde may be going up but also recognise that the land needed to accommodate the increased number of employees is being reduced. It does not necessarily follow that increased employment needs more housing land. Members are mindful of the fact that the ambitious employment land calculations correlates with a requirement for an increased allocation of housing land to provide homes for workers. In turn this could attract more "New Homes Bonus" that may well assist the Fylde Borough Council budget process but members keenly believe that only material planning considerations should be used that properly reflect the demographic requirements of Fylde.

Kirkham Town Council believed the allocated employment land calculations have been inflated to double the actual need derived from historic land take up. This allocated land should be given over to housing to reduce the need to build on green space. The inflated amount of Employment Land in the policy could undermine the Local Plan.

There has been no consideration given to Employment land becoming vacant only the need for new employment development. Fylde must deduct employment land that will become vacant.

Large manufacturing industries have reduced drastically on the Fylde which demanded much more employment land than technology based industry and the plan should reflect this

reduction in need. Consideration should also be given to new working practices such as working from home.

Our neighbouring Councils Wyre and Blackpool have jointly identified half the amount of Employment land than Fylde yet are both much larger boroughs with higher populations. Why would Fylde identify such huge amounts of employment land if not to inflate the housing numbers and increase the amount of "New Homes Bonus."

One resident objected to paragraph 9.12 by stating one stupid number added to another stupid number. They also object to EC1 stating this policy is based on the wrong numbers.

Two residents have submitted comments similar to those of Kirkham Town Council – adding that Fylde, which is smaller than both Blackpool and Wyre, appears to have twice as much employment land in its Plan as both Blackpool and Wyre together. The amount of land in the Plan is considered to be aspirational rather than what is actually needed. Employment in Fylde may be going up but the land needed to accommodate the increased number of employees is going down, increases in employment does not need more land

Treales Roseacre and Wharles Parish Council commented regarding land at Local Enterprise Zone sites at Warton and Blackpool which were duplicated here. CPRE - Fylde District, Medlar with Wesham Town Council also made comments about land in the Enterprise Zone the as contributing to part of the Borough's employment land requirement.

The Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs. However they would like to see the development work being done by local workers to provide income to local people and keep the money in the local economy.

A developer objected to the allocation of 0.9ha of land at Dock Road, Lytham (ES2) for employment uses. The reasons for which are stated under policy SL1 in Chapter 7.

Another developer objected to emerging Local Plan policy EC1 (site ref. ES1) and the proposed retention of the Class B employment allocation of the Queensway site. In accordance with Framework paragraph 22, it is their view that there has been no robust assessment by the LPA (via its appointed sub-consultants) of the continued appropriateness of the employment allocation or consideration of alternative use for the site. The discounting of residential use of the site (site ref. SA75) in the Sites Assessments Background Paper and the ultimate recommendation to maintain the employment allocation does not in any way have regard to the following:

- Marketing; Viability; Infrastructure; Blackpool Airport EZ designation; and ELPS Robustness.*
- A detailed commentary is provided for each of the above and they recommend the site should be allocated for Class C3 residential development and designated as strategic location for development in the Local Plan.*

It should be noted that this representation also extends onto adjacent lands which are designated as Green Belt.

Council response

Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

The council welcomes Blackpool Council's support. The Local Plan Policies Map produced for the Publication Version will include relevant site references.

In response to the various comment about providing Blackpool's employment land, the commitment to provide 14 hectares of employment land to help meet Blackpool's requirement up to 2027 was agreed under the Duty to Co-operate. The Fylde Coast Memorandum of Understanding includes a commitment to agree the sub-regional employment land requirement.

The Fylde Sub Region Employment Land Review: Summary Statement 2010 explains the consequences of Blackpool's tight knit boundary and demonstrable lack of future development land, meaning opportunities for further employment expansion within the Borough are extremely limited.

The formal request from Blackpool Council to Fylde Council to possibly consider providing this quantum of land was made in response to Fylde Local Plan Issues and Options Consultation. "8.2 Blackpool Council would welcome reference to the potential of land at Whyndyke Farm for employment use as part of a mixed use development. The Blackpool Local Plan Part 1: Core Strategy 'Revised Preferred Option' identifies an employment land requirement of 35 to 40 ha up to 2027. As only around 25 Ha can be accommodated within Blackpool, the Council would welcome discussions with Fylde Council on how Whitehills / Junction 4 might address this shortfall." (October 2012, Fylde Local Plan to 2030: Issues and Options consultation, Statement of Consultation – Part 2: Summary of Comments Received and Council's Response).

The Blackpool Local Plan Part 1: Core Strategy 2012-2027 was adopted in January 2016. As part of its preparation Blackpool Local Plan Part 1: Core Strategy, the Planning Inspector's Report (November 2015) states the following "As a result of the joint working Fylde Borough has formally agreed to seek to accommodate around 14 Ha of land for employment purposes, which is identified as necessary to meet Blackpool's requirements but which cannot be accommodated in the Borough."

The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of S106 when planning permission is granted. It

is not something the council would seek to influence through Local Plan policy. This is addressed under **Appendix 8**.

The process for reviewing the employment land supply is set out in Local Plan policy **GD8**. Plan 8 in the RPO shows the former GEC Marconi factory site as a housing commitment with planning permission.

The comments and objections relating to the employment land requirement are addressed above in the context of paragraphs **9.9-9.12**.

Comments regarding land at Local Enterprise Zone sites at Warton and Blackpool are addressed under policy **EC2**.

The comments and objections relating to Dock Road, Lytham (site: **ES2**) are addressed under policy **SL1** in Chapter 7.

It is recommended that the Queensway site: **ES1** be retained as a Class B employment site. The allocation and protection of land for employment land is long term - for the plan period up to 2032. This allocation is located immediately adjacent to an established industrial estate which the developer contesting the allocation of site **ES1** acknowledges is 'low grade' employment uses and is in close proximity to the main runway of Blackpool Airport. Future residential amenity on this site is therefore questionable and the continued allocation of employment land is deemed to be more appropriate in terms of possible future expansion of the existing industrial estate. The comments and objections relating to Green Belt are addressed under policy **GD2**.

Recommendations for change

- Publication Version Local Plan Policies to include relevant site references.
- Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

Policy EC2: Lancashire AEM Enterprise Zone, at BAE Systems, Warton

Number of representations:			
Comment	Support	Object	Total
6	1	1	8

Representations received from:

- Highways England
- BAE Systems Real Estate Solutions
- Lancashire County Council
- Bryning with Warton Parish Council
- Treales Roseacre and Wharles Parish Council
- CPRE - Fylde District
- 1 Landowner
- 1 Resident

What you said

Highways England commented that this is a new policy which supports the designation of the Lancashire Advanced Engineering and Manufacturing Enterprise Zone at BAE Systems in Warton. It identifies that a Local Development Order has been produced for the site along with a Masterplan to drive the overall delivery of the Enterprise Zone. This policy does not in itself allocate any development within the Enterprise Zone or supporting infrastructure improvements although it is noted within paragraph 9.24 of the supporting text that some local junction improvements will be required to support its delivery and that once completed the Preston Western Distributor Road and new junction 2 onto the M55 will improve connectivity between the two parts of the Enterprise Zone at Warton and Samlesbury.

BAE Systems Real Estate Solutions made several comments as follows:

- **9.24** *The third sentence should be re-worded as the junction on Lytham Road is already in place.*
- *They support the general thrust of policy EC2 but consider that it does not provide the flexible framework that the plan seeks to provide at Paragraph 2.46.*
- *There is a conflict between this policy which seeks the development of employment associated with the EZ and the aspiration for a local retail centre on BAE Systems land which will be within the EZ. This needs to be resolved.*
- *Criteria (b) should be labelled Local Development Orders.*
- *The policy should refer to the rationale for the LDOs in providing a simplified planning regime and wider permitted development rights.*

Lancashire County Council commented that this policy must align with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.

Bryning with Warton Parish Council, Treales Roseacre and Wharles Parish Council, CPRE - Fylde District and a resident suggested this site should be recognised as contributing to part of the Borough's employment land requirement.

Treales Roseacre and Wharles Parish Council specifically commented that the land at Local Enterprise Zone sites at Warton and Blackpool should be identified as additional employment land so that the total strategic opportunity for employment is shown.

The prospective or actual change in employment by the BAE Systems Real Estate Solutions and Balfour Beatty should be addressed directly within the context of the strategies of these organisations. FBC can engage with each organisation to encourage them to retain and grow their employment activities in the area in a sustainable way.

The policy would be more meaningful if the jobs targeted at each site were included, as these would have been used in the justification for the LEZ status to be granted. This is important, so that adequate resources are provisioned to support the growth objective.

They also commented that there is no reference to the Blackpool Airport LEZ.

CPRE - Fylde District made the following specific comments:

The AECOM/BE Employment Land and Premises Study excluded the Warton Enterprise Zone supplying new employment land because 'it is a planned re-use of an established employment allocation'. But this fails to allow for the Warton Enterprise Zone facilitating re-use of a significant part of the BAE Systems site, with ambition for a large net gain of 'jobs/Ha' by replacements for BAE job losses and jobs from new Enterprise Zone tenants.

The three areas of the Warton Enterprise Zone total 75 Ha. The north side Phase 1 currently offers 8.5 Ha. The south west and east areas outside the BAE airfield core, although designated by Fylde for employment, currently represent quite a low jobs/Ha density. Consequently, some of this total Enterprise Zone land should be counted as an allocation of 'new' employment land at Warton within the Local Plan period.

The declared aim of the Zone is to 'support genuine additional growth and new jobs to counteract the loss of employment by BAE Systems'. (Local Development Order, Reference 10). But this additional jobs growth does not need the Council to allocate any additional employment land elsewhere. And these new jobs would contribute to employment needs of Blackpool and the Fylde Coast Sub-region, as BAE Systems and its predecessors have always done.

The Zone (currently) provides incentives only for new jobs and only in the advanced engineering and manufacturing sectors. However, employment outside the scope of the Zone is not precluded by the LDO. Hence the AECOM/BE Study acknowledges 'that there may be exceptional circumstances where local occupier relocation or expansion could be appropriate – though they may not qualify for the Zone benefits'.

A landowner welcomed the Council's support for the delivery of the Lancashire Enterprise Zone and its associated Local Development Order and Phase 1 Masterplan, which is currently being implemented. They go on to comment that the Enterprise Zone represents a significant opportunity for Warton in terms of job creation and economic gain. It is therefore necessary to plan accordingly in terms of housing opportunities and appropriate infrastructure. The proposed housing requirement for Warton fails to do this and will need to be increased

significantly to truly support the Enterprise Zone. Additional housing development will also help to fund the additional infrastructure required in Warton, through developer contributions towards highways, public realm and education.

Council response

The council notes Highways England's comments.

The council will amend the third sentence of paragraph **9.24** to reflect the fact that the new junction on Lytham Road is complete.

The council will amend paragraph **9.21** to refer to the 2015 LDO.

The council considers that policy **EC2** is appropriate to support the specialised activity at BAE Systems, Warton. The flexible framework referred to in paragraph **2.46** relates to the Local Plan as a whole, not policy **EC2** specifically. The flexibility which is sought by BAE Systems under policy **EC2** could be brought about by way of other material considerations through the planning application process. The LDO does not preclude other development types being proposed or permitted in the EZ, it just means that development falling outside of the specific advanced engineering and manufacturing Standard Industrial Classification (SIC) Codes require the submission of a planning application.

In respect of the proposed local service centre at Warton, paragraph **6.19** states that the proposed local service centre is to be on BAE Systems land. As referred to under policies **SL3** and **EC4**, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

Criterion b) will be amended.

A new paragraph will be inserted after **9.22** which sets out the rationale for the LDOs in providing a simplified planning regime; wider permitted development rights; and the expected job creation in the Enterprise Zone.

The landowner's support is welcomed.

In response to CPRE – Fylde District it is not considered appropriate for the Warton Enterprise Zone site to be recognised as contributing to part of the Borough's employment land requirement. The LDO authorises development falling within specific Standard Industrial Classification (SIC) Codes, as far as it relates to advanced engineering and manufacturing.

In respect of land at the Blackpool Airport Enterprise Zone it will be targeting a number of key sectors to attract new investment and employment, including the civil aerospace sector, food and drink manufacture, the energy sector and digital and creative sectors, although no appropriate user would be excluded. 5.0 Hectares of land at has been allocated at Blackpool Airport (site **ES5**) has been identified under policy **EC1** for B1(a), B1 (b), B1 (c), B2, B8 uses.

The council will investigate increasing the potential employment land allocations at Blackpool Airport following the ratification of the Enterprise Zone on 1st April 2016. The Enterprise Zone will become operational from 1st April 2016 and continue until 2037.

The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone – see new draft policy **EC4** in the Additional textual changes box below.

The comments relating to the council encouraging BAE Systems Real Estate Solutions and Balfour Beatty to retain and grow their employment activities forms part of the on-going role of the council's Economic Development Service.

Recommendations for change

- The Publication Version Local Plan will be drafted to include a new policy (policy number **EC4**), regarding Blackpool Airport Enterprise Zone in Chapter 9.
- Amend paragraph **9.21** to read: 'The Council, ~~LCC and BAE Systems~~ have prepared a Local Development Order (LDO) for Phase 1 of the Enterprise Zone. It was adopted in 2012 and lapsed in October 2015. The 2015 LDO is, in effect, an extension of the previous Order with amendments to reflect the 2014 Masterplan, to increase the period of operation for a further nine years and take account of updated legislation. ~~The LDO will expire three years from the date of adoption. The future of the LDO – Part 1 will be assessed after its initial three years.~~
- Insert new paragraph after **9.22** (and renumber all subsequent paragraphs) to read: 'The LDO authorises development falling within specific Standard Industrial Classification (SIC) Codes, as far as it relates to advanced engineering and manufacturing. It has a number of conditions which need to be discharged by the Local Planning Authority. Development falling outside of these SICs therefore require the submission of a planning application. Building on the resurgence of advanced manufacturing and Government's re-commitment to positioning the UK as a leading force in global advanced engineering and manufacturing arena, the Lancashire Enterprise Zone will become a national focal point for the sector, help mitigate the impact of the potential job losses at the Warton Unit and the wider impact this will have on the Lancashire economy.' The Enterprise Zone will aim to provide the opportunity to create 4,000 to 6,000 high value jobs in the long term and 1,200 jobs in the short to medium term.
- Amend criterion b) of Policy **EC2** to read: Local Development Orders.
- Amend third sentence of paragraph **9.24** to read: Whilst the site is well-located, its accessibility and connectivity will need to have been strengthened through the delivery of the Enterprise Zone, with completion of a new highway junction completed on Lytham Road to access the site and support its delivery.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 9 and to ensure a new policy is included in the Publication version on Blackpool Airport Enterprise Zone.

Additional textual changes

- Re-number policy **EC2** to become policy **EC3** in the Publication version: ‘Lancashire Advanced Engineering and Manufacturing (AEM) Enterprise Zone at BAE Systems, Warton’.
- Amend the first sentence of criterion b) in policy **EC2** to read: ‘The council ... has produced and reviewed a Local Development Order - Part 1’
- Add a new policy: ‘**Policy EC4 - Blackpool Airport Enterprise Zone**
a) The Blackpool Airport Enterprise Zone
The boundary of the Enterprise Zone is identified on the Policies Map. The designation of the Blackpool Airport Enterprise Zone will help create more businesses, jobs and attract international investment, with positive benefits across the wider economic area. Fylde Council supports the sustainable development of Blackpool Airport, including working to explore the potential to develop commercial aeronautical activity. The Enterprise Zone will help improve the local economy and also increase the contribution to national growth.
b) Enabling Development
Alternative uses, such as retail, employment and leisure may be appropriate where it can be demonstrated that they are essential to help the delivery of aviation uses on this site. The scale of any alternative enabling development will be limited to that which is clearly demonstrated to be necessary to fund essential infrastructure and which will not prejudice the maintenance of the primary aviation function of the site. Any proposed main town centre uses must satisfy the sequential and impact tests set out in the National Planning Policy Framework and the relevant policies in this Local Plan.
c) Local Development Order
The council supports the delivery of the Blackpool Airport Enterprise Zone and will produce a Local Development Order to aid the delivery process. A Masterplan will also be produced and be adopted, which will form a key part of the overall delivery of the Enterprise Zone, together with an agreed programme of implementation in accordance with the Masterplan. The key purpose of the Masterplan will be to establish the development and design framework for the site and ensure it is in accordance with the relevant parameters within the Local Development Order.’
- Add supporting text to accompany policy on Blackpool Airport Enterprise Zone: ‘Blackpool Airport was proposed as an Enterprise Zone in March 2015 and following the submission of a business case it was designated in April 2016. The Enterprise Zone fronts Squires Gate Lane and currently comprises a mix of airport hangars, long stay surface car parking and sports pitches.’

Development of an Enterprise Zone at Blackpool Airport has the potential to provide opportunities for retail, employment and leisure uses at the airport and would also provide jobs close to where people live.
Blackpool Airport is previously developed land, which is within walking distance of Squires Gate Railway Station and there is good access by bus into Blackpool and Lytham and St Annes. New or improved signalised junction and public transport facilities, including associated highway infrastructure such as cycling and pedestrian facilities, will be required if the site is to meet its full potential. In terms of cycling, Lancashire County Council seeks a cycle path on Squires Gate Lane, along with toucan crossings.'

Policy EC3: Employment Opportunities

Number of representations:

Comment	Support	Object	Total
2	0	2	4

Representations received from:

- Highways England
- Treales Roseacre and Wharles Parish Council
- 1 Landowner
- 1 Action Group

What you said

*Highways England noted that this is a new policy which applies to the development of employment uses on land identified in policy **EC1** along with any other location within the Borough to protect employment land for viable employment uses. It sets a policy presumption to retain employment sites, unless there is no reasonable prospect of the site continuing in that use and supports the sustainable growth and expansion of all businesses provided proposals are compliant with other policies in the Plan. Consequently, the policy should not present any particular concern for Highways England.*

*Treales Roseacre and Wharles Parish Council commented that Shale Gas development in the rural areas is inconsistent with paragraph **9.28**.*

*A landowner objected to this policy as it is too vague. For reasons already highlighted in the consultation response to policy **GD8** there are concerns at the obstacles being placed to the redevelopment of employment land, which conflict with the objectives of the Framework. To compound this by suggesting that any type of use could be treated by the council as being an*

employment use is entirely unjustified. It is also too vague and only B1, B2 and B8 uses should fall to be considered against general employment related policies.

An Action Group has questioned why Wrea Green is being regarded as sustainable despite the Appeal Inspector's evaluation?

Council response

The council notes Highways England's and Treales Roseacre and Wharles Parish Council's comments.

Paragraph **9.28** refers taking a positive approach to sustainable new development in the context of paragraph 28 of the Framework. Policy **S1** sets out the proposed settlement hierarchy as the basis for sustainable communities.

The landowner's comments are addressed under policy **GD8** in Chapter 8.

Recommendations for change

- Re-number policy **EC3**: Employment Opportunities to become policy **EC2** in the Publication version of the Local Plan.

Policy EC4: Vibrant Town, District and Local Centres

Number of representations:

Comment	Support	Object	Total
2	1	5	8 ³⁶

Representations received from:

- BAE Systems Real Estate Solutions
- Blackpool Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- 1 Action Group
- 2 residents

What you said

BAE Systems Real Estate Solutions commented that there is no map at the back of the plan to show the location of the proposed local centre in Warton. They also stated that the policy should also refer to the established and identified local centre need within the adopted Local Plan that remains unfulfilled.

*Blackpool Council - The RPO introduces a local impact assessment threshold of 750 square metres for use when assessing applications for retail, leisure and office development outside of town centres, which is welcomed. Out-of-centre retailing on the Fylde-Blackpool Periphery or in St Annes/Lytham could impact upon Blackpool Town Centre and other designated Blackpool centres, so it would be useful if applicants in Fylde are made aware that the impacts of out-of-centre retailing often cross Borough boundaries. It is suggested that wording is included in policy **EC4** (Vibrant Town, District and Local Centres) and its supporting text to ensure that applicants take account of Blackpool and the wider area when undertaking sequential testing or impact assessments, when appropriate.*

It is suggested that the proposed local centre at Whitehills should be more centrally located with respect to development in the area and include plans for radial pedestrian and cycling linkages to encourage travel by sustainable transport modes. In addition provision needs to be made to ensure regular buses to Blackpool, Preston and Lytham St Annes serve the centre of the development and operate on a commercial footing.

Greenhalgh Parish Council and a resident wished to see changes to the plan to limit expansion of development into the countryside through strong policies which resist out of town retail and leisure development in order to protect the vitality of the centres of St Annes, Lytham and Kirkham.

Medlar with Wesham Town Council stated that Wesham, has its own distinctive local centre. They object to the fact that it has not been identified as such. Wesham is NOT part of Kirkham Town Centre.

*An Action Group questioned item 3 - SO why does Freckleton receive SO little housing? Anything to do with chairmanship of the DMC? The also stated that in relation to paragraph **9.44** parking in Lytham is a major and costly issue.*

Broadly we support the draft local plan; however the Council's failure to produce a local plan in a timely way has led to development or applications for development which are neither required nor desired.

A resident commented that whilst accepting that Kirkham is not a tourist destination unlike Lytham and St Annes, we feel that further work could be done to promote the town as a visitor centre. The work done on some shop fronts and pavements have enhanced the visual aspect of the town but further incentives to encourage good quality retail would make a huge difference in keeping people of the town and visitors spending their money on the highstreet. The market square in particular looks shabby and some further street scene work would be beneficial to this very historic quarter of the town.

Council response

In respect of the proposed local service centre at Warton, paragraph **6.19** states that the proposed local service centre is to be on BAE Systems land. As referred to under policy **SL3**, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

The council notes the comments relating to the proposed local centre at Whitehills. The starting point for planning the Fylde-Blackpool Periphery Strategic Location for Development is policy **M1**. Criterion a) states that the Strategic Locations for Development should be looked at as a whole. The proposed location on Plan 1 is indicative. Notwithstanding this a significant amount of development has either been approved or implemented in this location, so the scope for alternative locations can only be explored to some limited extent. The provision of bus services is addressed in the accompanying IDP. The council will illustrate the location of the proposed local centre at Whitehills on the Publication Version **Policies Map**.

Blackpool Council's support for the local impact assessment threshold is welcomed. The policy will be amended to the effect that when undertaking sequential testing for retail, leisure and office development, regard should be had to their likely impact upon other centres, including those outside of Fylde.

The last section of the policy and supporting text at paragraph **9.51** states that proposed development in 'Out of Centre' and 'Edge of Centre' locations will be considered in line with the framework. This is considered to be a robust policy approach.

Wesham has been excluded from the list of Local Centres listed in policy **EC4** as the services and facilities in Wesham are dispersed and there is no clear nucleus to the centre. The council does not consider there to be a distinctive or identifiable boundary for a centre.

It is not considered appropriate to refer to the established and identified local centre at Warton. This plan is about place making for the future. Paragraph **7.51** acknowledges that there is currently a lack of facilities and services.

In responding to the Action Group - The council has established the retail hierarchy of centres based upon the level of services and facilities which it is proposed to offer at the end of the Local Plan period. This is not a reflection of the level of growth which is proposed in the Local Plan. The settlement hierarchy identifies Freckleton as a Local Service Centre, whereby development will be by way of infilling and rounding-off. The comments relating to parking are noted.

The resident's comments about Kirkham town centre have been passed to the council's Regeneration Team as they are relevant to future town centre improvement projects.

Recommendations for change

- After paragraph ‘Development outside of town centres’ in policy **EC4** add: ‘When undertaking a sequential test, or retail impact assessment, it will be necessary to have regard to likely impact upon other centres, including those outside of Fylde.’
- Amend last paragraph of policy **EC4** to read: ‘Proposals for retail, leisure and office development in ‘edge of centre’ or ‘out-of-centre’ locations will be considered in line with the Framework, bearing in mind the impacts on existing centres.’

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy, together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Re-number policy **EC4** to become policy **EC5** in the Publication version.
- Amend the first sentence of the policy to read: ‘The town, district and local centres; and primary and secondary frontages are defined on the Policies Maps which accompanies at the back of this plan.’
- Add the following sentence at the end of the paragraph following criteria 1) to 4) under ‘Local Centres’: ‘The Local Centres at Warton and Whitehills should include pedestrian and cycling linkages and access to public transport.’

Policy EC5: Leisure, Culture and Tourism Development

Number of representations:

Comment	Support	Object	Total
1	2	2	5

Representations received from:

- Highways England
- Canal and River Trust (formerly British Waterways)
- BAE Systems Real Estate Solutions
- 1 Action Group
- 1 resident

What you said

Highways England noted that the policy has been significantly amended, however none of the amendments represent any particular concern for Highway's England and as such the previous comments remain applicable, which were as follows:

The Agency has no particular comment, but is generally supportive of locating leisure, cultural and tourism development in St Anne's and Lytham, where their scale and cumulative impact is appropriate to the location, and the Agency would like to see consideration given to ensuring destinations are accessible by sustainable modes of transport.

The Canal and River Trust (formerly British Waterways) welcomed recognition of the potential of the Lancaster Canal to contribute to rural tourism.

BAE Systems Real Estate Solutions note the promotion of the Ribble Coast and Wetlands Regional Park as a leisure and tourism facility within the Borough. However, as part of this Park is adjacent to the Warton Aerodrome, BAE Systems consider the plan needs to include suitable safeguards to the operational requirements and communication systems at the Aerodrome from any developments associated within the Park.

An Action Group questioned how mutual benefits referred to in paragraph 9.61 are to be achieved.

A resident commented that paragraph 9.71 that this is a visionary point with no plan or schedule behind it. The point is a target only and has no plan, no structure, no aim behind it. If this is a serious point then there needs to be more depth, timescale and definition within it.

Council response

The council welcomes the support of Highways England and the Canal and River Trust (formerly British Waterways).

The council will amend paragraph **9.69** to take account of the operational requirements and communication systems at Warton Aerodrome.

In respect of paragraph **9.61** it is the variety of tourism and leisure destination types on offer which will cater for different requirements, tastes and budgets. Attracting visitors to both Fylde and Blackpool resorts brings benefits to the wider area.

In response to the resident's comments, all details are set-out comprehensively in the associated Infrastructure Delivery Plan.

Recommendations for change

- Amend paragraph **9.69** to read: '...assets. Any development associated with developing the Ribble Coast and Wetlands Regional Park will be have regard to safeguarding the operational requirements and communication systems at Warton Aerodrome.'

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy; together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan; and the inclusion of additional text to clarify the location of the Sea Front Area which will appear in the Publication version of the Local Plan.

Additional textual changes

- Re-number policy **EC5** to become policy **EC6** in the Publication version.
- Amend criterion e) in policy **EC5** to read: '... within town centres in Key Service Centres and in Local Service Centres.
- Add two new criteria (i.e. j and k) to the policy: 'Encouraging the provision of training in leisure, culture or tourism development' and 'Project specific Habitats Regulations Assessments (HRAs) will be required for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no significant effect upon European Sites before the tourism and / or coastal defence developments can be granted consent.'
- Amend the policy to read: 'The Island Sea Front Area at St Annes'

Policy EC6: Tourism Accommodation

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to policy **EC6**.

Recommendations for change

- None

Additional recommendations for change

One of the following additional changes is a sequential re-numbering of a policy; together with a change proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Re-number policy **EC6** to become policy **EC7** in the Publication version.
- Amend the first sentence of the policy to read: ‘... as defined on the ~~Inset~~ Policies Map, provided that proposals
- Add a third criterion to the policy: ‘(iii) do not adversely affect the nature conservation assets of the coastline and protected species, including the Ribble and Alt Estuaries SPA / Ramsar site.’

Chapter 10 Provision of Homes in Fylde**Chapter 10: Housing Land Requirement and Supply**

Number of representations:			
Comment	Support	Object	Total
3	0	5	8

Representations received from:

- Treales, Roseacre and Wharles Parish Council
- Bryning with Warton Parish Council
- 1 Landowner
- 1 Action Group
- 1 Resident

What you saidParagraphs 10.6 – 10.14

Treales, Roseacre and Wharles Parish Council stated that it is not clear how the Local Enterprise Zone job targets, Warton and Salmesbury (6000 direct, 5000-7000 indirect) and Blackpool 3000 are reconciled with the infrastructure required. The Scenarios in the SHMA should consider shale gas development. The assumptions underpinning the national government targets should be challenged and updated scenarios created.

Bryning with Warton Parish Council (10.13) found that the methodology and rationale drawn to justify the level of housing required in the borough for the Local Plan are highly questionable and flawed, the figure is way too high (see H1 Housing Figure Too High).

A landowner stated that with respect to paragraphs 10.6 -10.10, the Local Plan is not providing for adequate housing in line with the Objectively Assessed Need, additional housing will be required, see response to H1 -Housing Figure Too Low.

An Action Group objected, questioning what action is to be taken to achieve this? Fylde has a higher proportion of empty homes than the national figures and enough to support a 1.5 year supply, therefore making a five year supply fulfilled (10.3), they also question why more specialist accommodation for the elderly hasn't been provided since 2011 in Wrea Green. Also consents approved will overwhelm services and infrastructure (10.4).

An Action Group wanted to see the full split of the housing figure by location, tenure and housing type (10.13), they also referred to the Housing Needs Survey 2012 for Wrea Green.

A resident objected stating that paragraph 10.9 is a very misleading statement the forecast was not on the basis of forecast job growth, it was based on a desired job growth scenario

which has not been supported by the studies, and that there has been selective use of the evidence (paragraph 10.10) Strategic Housing Market Assessment (SHMA) and Addendum 1. An Action Group objected questioning whether the forecasts in jobs growth should not come to some fruition before the homes are approved?

Council response

The Enterprise Zone job targets are aspirational and in the case of Warton, they are not currently being realised. The Enterprise Zone prospectus and the Local Development Order set out the infrastructure requirements for the Warton Enterprise Zone.

The impacts of shale gas exploration are unknown. There are counter arguments for and against shale gas exploration. The industry is in a pre-exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.

The housing trajectory at **Appendix 2** does set out the location of new housing, and the SHMA and Addendums 1 and 2 do evidence the tenure and house type that are needed, however, government policy with respect to tenure and house type is changing, the Publication version of the plan will reflect the latest government policy and where up-to-date evidence on local housing need is available it will be used to inform decisions on planning applications.

The council has followed the instructions in the National Planning Practice Guidance (NPPG) and has considered the evidence (SHMA plus Addendums 1 and 2 and the Housing Requirement Paper) and selected the figure of 370 homes per annum, that is the role of the council as Local Planning Authority.

With respect to the Action Group's objection, the council cannot assume that all empty homes will come back into the supply within 5 years, this would be unrealistic. In the Five Year Supply calculation an allowance is made for 10 long term empty homes per annum re- entering the market. The objections to planning consents are noted.

The housing requirement figure is dealt with under policy **H1** in Chapter 10.

The forecasts in job growth do not have to come to fruition before housing is approved, the NPPG makes it clear that the provision of jobs and homes should be considered in tandem.

Recommendations for change

- None

The Five Year Housing Supply

Number of representations:			
Comment	Support	Object	Total
5	0	1	6

Representations received from:

- Home Builders Federation
- Blackpool Council - Planning
- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner
- 1 Developer
- 1 Resident

What you said

Paragraph 10.15

The Home Builders Federation welcomed the recognition that the council does not have a five year supply, it is paramount that the plan seeks to address this at the earliest opportunity. Proactive approach to delivery and inclusion of attractive sites are required, the cumulative impact of numerous policies are unlikely to ensure a five year supply at adoption.

Blackpool Council stated that a five year supply should be identified in the Publication Version of the plan. A lack of a five year supply will encourage developers to target additional sites in the Fylde Blackpool Periphery which will have implications for services and infrastructure in Blackpool and the Blackpool Housing Strategy. There is no set methodology for five year land supply calculations, Blackpool's method was found sound at examination, therefore it is suggested the following approaches should be taken at Fylde:

- *Removing the application of an additional 10% discount on all sites*
- *Dealing with the undersupply over the plan period, rather than within five years.*
- *Making an allowance for windfalls*
- *Also planning permission has recently been granted for 360 homes in Warton on land not currently included in the supply, this could be included and would boost the supply.*

The CPRE stated that it had demonstrated that with the methodology and assumptions being used by the council to satisfy the Framework rule, currently a five year housing supply would be shown with a housing requirement of 328 homes per year. To be found sound the Publication version of the Local Plan must demonstrate a 5 Year Housing Supply.

A landowner stated that if the Local Plan cannot demonstrate an adequate supply to deliver the first five years of the plan period it is unsound, the council need to identify more housing land.

A developer asserted that the 20% buffer should be applied not only to the 5 year requirement but also the 735 backlog because this backlog is brought forward into this the first five years of the plan and is therefore part of the five year requirement. Secondly, they state that the council cannot meet its housing requirement in the first five years of the plan period, on this basis this element of the plan is considered to be unsound because it does not meet the test of being positively prepared or effective.

A resident stated that the housing requirement has been based on a selective assessment of the evidence (discarding historic trends), if it had a sensible number the council would have a five year land supply.

Council response

The council agrees that it does not currently have a five year supply of housing land. The council also accepts that this could encourage housebuilders to target additional sites for development. It should also be noted that the council will have a Five Year Land Supply at adoption of the Local Plan because the remaining allocations in the plan will then contribute to the five year calculation as supply. The Local Plan does contain four strategic sites which between them contain a significant number of sites, the majority of which have planning permission. These sites are being delivered with completions currently ongoing at all of the strategic locations.

With respect to Blackpool Council's comments in relation to the five year supply methodology, the 10% lapse (discount) rate is applied to all sites as a general allowance for sites not coming forward. The 10% is applied to the total existing and potential supply. The main benefit being that it avoids the need to go through all of the sites being considered, one by one at a Planning Inquiry, it is a generic approach which can be agreed by both parties and has been examined and supported by Inspectors' at Fylde Planning Inquiries (Section 78). This approach has also been supported elsewhere (outside Fylde) at Planning Inquiries involving the five year supply, as a reasonable approach. Blackpool's Five Year Supply methodology remains unchallenged by the development industry, Fylde's approach has been challenged and examined on numerous occasions. The resulting methodology has been accepted and supported by Planning Inspectors.

With respect to the issue of dealing with the undersupply over the plan period rather than within five years. The PPG states that Local Planning Authorities should aim to deal with any undersupply within the first five years of the plan where possible. Where this cannot be met in the first five years, local planning authorities will need to work with neighbouring Authorities under the Duty to Co-operate.

Blackpool Council has been allowed to deal with their backlog over the plan period. This approach has been supported by Blackpool's Inspector where the five year supply calculation

has been related to the whole plan period and the examination of a Core Strategy. However, at Fylde it is clear from various Planning Inquiries involving the Five Year Supply Calculation, that because the country is now out of recession, the backlog cannot be attributed to the recession and should, therefore, be tackled over the first five years of the plan period.

A developer has objected to the plan and asserted that the backlog should be brought forward into five years of the plan and dealt with in the five year supply calculation. Fylde would not have an allowance for large windfalls because it has not had any allocations, therefore all large housing sites would be windfalls and there are no past completion rates from large windfall sites to project forward.

A windfall allowance for small sites is included in the trajectory for the Local Plan from Year 6 onwards, this is based on past completion rates on these sites (development in gardens is not included in line with the Framework). Year 1-5 includes small sites for 1-9 homes as commitments. This approach was agreed by the Inspector at the Blackfield End Farm Inquiry.

The council agrees that the Five Year Supply calculation should be updated to a base date of 31 March 2016, it will then include all the current commitments.

With respect to the two comments on the housing number (in relation to the five year supply) no evidence has been provided to support the selection of a lower housing requirement figure. The housing figure is dealt with at policy **H1**.

Recommendations for change

- The council will update its Five Year Housing calculation to a base date of 31st March 2016.

Housing Delivery and Allocations

Number of representations:

Comment	Support	Object	Total
0	1	7	8

Representations received from:

- Home Builders Federation
- 2 Landowners
- 1 Developer
- 1 Action Group

What you said

Paragraphs 10.16 – 10.19

The Home Builders Federation supported the plan identifying a greater supply of housing than the proposed housing requirement, the plan requirement should be and is identified as a minimum, it therefore stands to reason that the plan should seek to surpass this requirement, secondly a buffer will provide a balance against the inevitable under or none delivery from existing commitments or proposed allocations (paragraph 10.16).

Also the Home Builders Federation and a developer stated that the plan seeks to provide 390dpa, 20dpa greater than the proposed requirement. This provides a 5% buffer which is not considered sufficient. A buffer of 20% should be provided, due to poor past delivery. Given poor past delivery and the lack of a five year land supply the plan should not artificially constrain sites through a phasing mechanism (paragraph 10.17).

Two landowners stated that paragraph 10.17 acknowledges that the identified supply is only marginally higher than the proposed requirement and provides a small buffer of only 22 homes per annum, this is insufficient and the Local Plan requirement should be identified as a minimum to conform to Framework requirements. It stands to reason that the Local Plan should not simply seek to match or slightly exceed the requirement, but should proactively aim to clearly surpass it. An adequate buffer is needed to provide an adequate balance against the inevitable under or none delivery from some existing commitments and or proposed allocations.

An Action Group was very much in favour of the plan but did not agree with the overall housing need, the evidence is inconclusive and the final figures do not correlate with the data, they are also concerned that the plan will not be consistently implemented. What did the delivery of 250 homes per annum actually show – a housing shortage, how did this manifest itself? How many people are seeking homes (other than socially rented) who cannot find on? Also why was paragraph 10.19 not applied to planning application 15/0458.

Council response

The housing requirement will continue to be expressed as a minimum. Neither the NPPG nor the Framework state that the plan should surpass the requirement, expressing the figure as a minimum means that the requirement figure should be met.

The use of the word 'buffer' in paragraph 10.17 seems to have caused some confusion amongst respondents and it is therefore recommended that this wording is changed to a small amount of headroom above the housing requirement for the plan period. The extra 20 homes per year that the plan has the potential to supply, is completely separate to the 20% buffer which is added to the five year housing requirement (in effect bringing year 6 into the requirement), which the council does in its five year housing supply calculation because it has been underachieving delivery.

The issue of phasing is responded to under General Comments on policy H1, see below.

The overall housing need is dealt with under responses to policy **H1**. The annual completion rates are analysed in more detail in the SHMA, detailed information of the households arising is contained in Addendum 2 to the SHMA.

With respect to the objections made by the Action Group the SHMA and Addendums 1 and 2, contain a great deal of information with respect to the numbers of households who will be seeking homes over the plan period.

Recommendations for change

- Delete the reference to buffer from paragraph **10.17** and replace it with: ‘The supply provides a small amount of headroom above the housing requirement for the Plan period’.
- Amend the text in paragraph **10.17** and throughout the plan to read: ‘a minimum of ~~7,700~~ 7,770 new homes’.

Additional recommendations for change

The following additional change is proposed to update the text of Chapter 10 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Replace all references in the Local Plan from ‘flats’ to ‘apartments’.

Policy H1: Housing Delivery and the Allocation of Housing Land

Number of representations:

Comment	Support	Object	Total
16	2	16	33

Representations received from:

- Highways England
- The Home Builders Federation
- Blackpool Council - Planning
- Kirkham Town Council
- Medlar with Wesham Town Council

- Newton with Clifton Parish Council
- Greenhalgh with Thistleton Parish Council
- Bryning with Warton Parish Council
- Council for the Protection of Rural England (CPRE) - Fylde District
- 5 Landowners
- 2 Planning Consultants
- 5 Developers
- 1 Action Group
- 5 Residents

What you said

General Comments

Highways England commented that it is unclear whether the housing requirement figure is 370 homes per annum or 513, given that there is enough land in the plan to deliver 8,188 homes.

The Home Builders Federation and a planning consultant supported the monitoring of housing delivery however, if the plan is failing to deliver the council should also consider triggers for an early review. The council may wish to identify timescales for delivery through a trajectory but should not seek to stall sustainable and deliverable sites coming forward, this will prevent the council from having a five year supply.

The Home Builders Federation and a planning consultant objected to the artificial phasing of site release in Fylde. Prior to adoption of the plan the council will have already identified that the proposed allocations are sustainable and their development should not be artificially constrained.

Blackpool Council suggested that the housing requirement figure actually equates to 7,770 homes over the plan period, rather than 7,700 and this figure should be used to provide greater clarity, also it would be useful if the housing and employment policy allocation numbers could be shown on the inset maps as they are not currently identified.

Blackpool Council supported the rates of delivery set out in the Trajectory and state that realistic lead-in times and build out rates have already been considered as part of the assessment.

An Action Group requested the full split of these figures by location tenure and type, this is essential to proper planning. A total of 370 is insufficient to ensure the right homes are built in the right place! Is the figure correct bearing in mind Keppie Massie's comments on over supply.

*A number of landowners objected to paragraph 10.22 which explains that the identified supply also includes an allowance of 680 homes from unallocated small sites and an anticipated windfall allowance (however, the figure in **Table 2** puts this at 937 homes). This adds to the*

risk of under delivery and further underlines the need to increase the planned requirement and provide an adequate buffer.

A developer supported the fact that the housing requirement is not viewed as a minimum, another developer recommends that the housing requirement figure is identified as a net requirement, noting the recent Inspector's Report into Blackpool Council's Core Strategy which requested this modification.

*A further developer commented that criterion d) of policy **H1** seeks to constrain delivery through the references to phasing of housing in the Fylde, they also cross reference paragraph 2.30 and the definition of phasing in the Glossary (inconsistencies), a planning consultant also objects to artificial phasing and recommends that these delivery expectations are clearly noted as being indicative.*

Another developer went onto say that the phasing of sites should only be applied on account of constraints or infrastructure issues (such as utility or roads) which mean that the development cannot be realised now. A phasing strategy fails to accord with the presumption in favour of sustainable development.

Housing Number Too High

*This section included comments on policy **H1** and other comments on the Housing Number made via the supporting text in Chapter 10.*

*Bryning with Warton Parish Council in regards to paragraph **10.13** find that the methodology and rationale drawn to justify the level of housing required in the borough for the Local Plan are highly questionable and flawed, the figure is way too high.*

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

Kirkham Town Council, Newton with Clifton Parish Council and a resident stated that the number is totally unachievable and should be reduced accordingly. Previously developed land and unused employment land should be used instead of greenfield. The future employment figure on which the housing number is based are inflated, future housing requirements should be based on historic fact. The consultants openly stated that they used standard models for comparing Fylde to other areas, the affordable housing figure is one tenth of the 420 stated, as the affordable number has been badly misjudged the policy should be adjusted to reflect this. Affordable housing has not met the 30% obligation, and building numbers have had to be reduced, also there is a large housing development close to Fylde's border in Preston which would reduce Fylde's need.

Medlar with Wesham Town Council were of the opinion that the figure of 370 is too high because historically the actual delivery figure has been about 250, rarely exceeding this figure. The buffer of 20 should have already been included in the 370. Commitments should give a five year supply, developers have failed to deliver completions.

It is the opinion of the CPRE – Fylde District that the housing requirement figure of 370 homes per year is based on an objectively assessed need calculation based on unrealistic scenarios leading to an unreasonably high figure. CPRE – Fylde District agree with a number of caveats in the housing requirement paper suggesting the figure could be too high. From the starting point of the 2012 SNHP, and taking into account market signals reflected in the shortfall in take up and completions, CPRE – Fylde District has suggested the realistic achievable housing requirement for Fylde ought to be circa 250 homes/year.

Two residents objected to the housing number in particular the 140 homes proposed at Elswick.

A resident suggested that Fylde Council reduces the annual requirement figure to 300, in light of the inability of existing developers to build more per year, secondly Fylde Council will object to any future applications by developers until they have completed 50% of their existing commitments and this must include 50% of the social housing proposed by the application.

A further resident objected to the housing figure and states that Fylde should not be made to meet targets that are appropriate for South East England, Otherwise there will be empty homes, partially developed sites, destruction of quality farmland and loss of rural character. All areas of the borough should meet the target, Kirkham and Wesham is making a disproportionate contribution.

Another resident was concerned that the housing numbers will unnecessarily over provide the real growth needs, more agricultural land will be lost, more retired and economically inactive people will be attracted to the area. Otherwise, the area will attract in commuters with pressure on highways which is unsustainable.

Housing Number Too Low

A landowner stated that with respect to paragraphs 10.6 -10.10, the Local Plan is not providing for adequate housing in line with the Objectively Assessed Need, additional housing will be required. Another landowner, states that the proposed housing requirement of 7,700 does not ensure the council will make every effort to meet its identified Objectively Assessed Need and respond to wider opportunities for growth, it should therefore be increased.

A further landowner stated that 370 homes per annum is insufficient to meet development needs to 2032, it will not sustain nonstrategic locations for development and settlements such as Staining. Delivery has been over estimated and there is over reliance on windfall sites. It will not meet the need for affordable housing. Development levels should be increased to allow for sites in larger Tier 1 Rural Settlements such as Staining to come forward.

Another landowner commented that there was an over-reliance on unidentified windfall sites, the planned housing requirement should be increased to provide an adequate buffer through a positive plan led approach. Another Landowner states that the buffer of 20 homes per annum is insufficient, it will only take one of the larger strategic sites to stall and the Council

will not be meeting their five year housing land supply. On this basis it is considered that their site at Moss Side Lane Wrea Green should be allocated.

A planning consultant stated that 370dpa is an underestimate and does not represent a true Objectively Assessed Need, it should be increased to reflect recent projections, market signals, employment policy and natural change. The plan seeks to retain younger people, and promote industry, this will impact on the need for housing at Warton. The plan is unsound, the figure should be increased or there will be housing pressures and shortages.

A number of landowners plus a planning consultant stated that the upper end of the up-to-date SHMA Addendum 2 scenario outputs (based on the CLG 2012 - based household projections) justify a higher employment – led Objectively Assessed Need than the proposed housing requirement of 7,700 homes based on the population led Objectively Assessed Need which does not provide the scope to reduce the current rate of unemployment in Fylde. On this basis, regardless of historic delivery rates and in the absence of major constraints to meeting its Objectively Assessed Need, the council should plan for a higher requirement to enable economic objectives to be met. Also the Local Plan does not provide sufficient flexibility and built-in headroom (contingency) to maximise the prospect of delivery being frontloaded in the early years given the step change that is needed to reverse under delivery which has worsened over the first four years of the plan period.

The SHMA Addendum 2014, identified three employment led scenarios which range from 302 to 434 homes per annum, 370 would only fulfil the Experian projections under either the baseline or reduced unemployment sensitivity test. Blackpool’s Inspector placed significant weight upon the Oxford Economic Projections, which would require a housing requirement of at least 411dpa in Fylde. To align the housing requirement with this strategy would require a net minimum of 400 dpa. It is clear that 370dpa is not sufficient to meet its Objectively Assessed Need of the area within its own boundaries. They go on to say that with regard to affordable housing needs the SHMA Addendum identifies an affordable housing need of 249 dpa, which equates to over two thirds of the housing requirement. They then go on to quote the Framework and the PPG which advises that an increase in total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes (ID2a-029). The PPG also states that the more significant the affordability constraints the larger the additional supply response should be. This evidence supports their position that the proposed housing requirement is too low and does not align with the economic strategy within the plan, nor will it meet the affordable housing needs of the area. Finally they comment that the SHMA is based on a period up to 2030, whereas the Local Plan is based on a plan period is up to 2032, there is therefore a need for additional evidence to justify this extension and the further implications for the Council’s housing needs and supply. They conclude by recommending that the housing requirement be increased to at least 400dpa (net).

A further planning consultant considered that the plan has underestimated the annual housing requirement by approximately 20% and that a figure of 440 to 450 dpa would be required to meet Fylde’s economic growth aspirations and affordable housing obligations, as recommended in the 2014 SHMA Addendum 2. This gives a total supply of 11,088 – 11,340 homes, which represents an increase of up to 3,150 homes (38%) from the identified supply.

An earlier version of the plan indicates Warton could support 1,160 homes, which is not considered unreasonable as it equates to just 15% of the 3,150 additional homes required.

A planning consultant stated that 370dpa was an underestimate and does not represent a true Objectively Assessed Need, it should be increased to reflect recent projections, market signals, employment policy and natural change. The plan seeks to retain younger people, and promote industry, this will impact on the need for housing at Warton. The plan is unsound, the figure should be increased or there will be housing pressures and shortages.

A developer objected to the proposed 370 per annum because it is considered insufficient to meet job growth in the borough. The 2012- based household projections project a starting point estimate of 221 dpa. Whether an adjustment to the starting point is needed is required depends on the results of the following tests:

Adjusting for Demographic Evidence: Two of the demographic forecasting scenarios undertaken by Edge Analytics presented in the Council's SHMA Addendum 2 document, present alternative demographic trend scenarios. The scenario base on 10 year net migration trends ensures a stable labour force and an associated growth of 320 homes a year: dpa (based on adjusted headship rates and including attributable population change) or 370 homes a year: dpa (based on adjusted headship rates and excluding attributable population change). However, the labour force growth would not be sufficient to meet the Council's or the wider LEP's growth aspirations.

Adjusting for Likely Change in Job Numbers: The council's own economic-led assessment (it is assumed the respondent is referring to Addendum 2) shows a requirement for a need for between 440 and 450 homes per annum to meet demographic and economic led need based on the Council's economic growth aspirations. The 2014 SHMA shows a requirement to plan for at least 400 homes per annum based on economic led need, so Addendum 2 shows that economic led need is now higher than that proposed in the SHMA.

Adjusting for Market Signals and Household Formation Rates: A worsening trend in any indicator will require an upward adjustment to the starting point.

The council's preferred approach is a target of 370 dpa, this is based on a 'business as usual' scenario of job growth. It is therefore considered that to 'boost significantly' the supply of housing, housing growth based on achieving economic growth in Fylde is required. Failure to meet this level of growth would wholly conflict with the council's growth aspirations. Based on the above, it is concluded that the Local Plan is unsound as the proposed housing requirement has not been positively prepared and is not consistent with national policy.

The Housing Number is Correct

Finally, a planning consultant, on behalf of a landowner stated that they have no specific comments to make on the requirement of 370dpa as there have been a number of factors which have resulted in an uplift from the demographic starting point.

Council response

General Comments

In response to the general comments made to Chapter 10, the council agrees that the housing number will continue to be expressed as a minimum, it will also be made clear that it is a net requirement.

The council notes Highway England's comments and explains that the housing requirement figure is 370 homes per annum, however, the Local Plan includes enough sites to provide for 390 homes per annum, that is an extra 20 homes per annum, which is a total of 8,188 homes over the plan period to 2032.

The council agrees with Blackpool Council's suggestions that the housing requirement number for the plan period should be 7,770 rather than 7,700 and also that housing and employment policy allocation numbers should be shown on the maps.

The Home Builders Federation and a Planning Consultant suggested that the council should consider triggers for an early review. Criteria b) of policy **H1** states that the council will review housing delivery performance on the basis of rolling three year completion levels and if targets are missed by more than 20%, uncommitted sites will be brought forward to achieve a higher rate of delivery. References to phasing will be removed from the plan.

With respect to the objections raised by the Action Group, the location of new homes is set out in the Trajectory at **Appendix 2**, the evidence relating to the tenure and type is included in the SHMA. The Local Plan will not specify this level of detail because government guidance on these aspects of housing provision is changing all the time, and the plan would quickly become out of date. The council have checked with Keppie Massie who have not made any comments on oversupply, they did however state that some confidence has returned to the housing market.

The Home Builders Federation, a planning consultant and two developers have stated that the council should not be implementing a phasing strategy criterion d) of policy **HL1**). In the Preferred Option Local plan sites were phased at the request of United Utilities because of capacity issues with the wastewater system. However, since then United Utilities have confirmed that all issues can be resolved and so the decision was taken that the only assumptions about delivery in the RPO would be in relation to the stage that a site was at in the planning system e.g. no application received, reserved matters approved etc., build out rates and also the size of the site, so a larger site would have more than one developer and the build out rates would be higher. These assumptions were agreed with the development industry at a Strategic Housing Land Availability Assessment Steering Group meeting and are included in the council's Five Year Supply methodology. The Council also contacted all the Local Planning Authorities in Lancashire, in order to check whether the build out rates being assumed for Fylde were realistic. Blackpool Council state that the RPO trajectory indicates that realistic lead- in times and build out rates have already been considered as part of the assessment.

From the Five Year Supply Statement 31 March 2015:

Build out rates and phasing

The build-out rates that are used in the calculations are the same as those that are used in the emerging Local Plan and the SHLAA 2015 update (to be published in autumn 2015). The SHLAA is a robust piece of evidence that is produced with input from a SHLAA Steering Group. The SHLAA assumes that 15 homes will be built in the first year and 30 homes in subsequent years. If the site has a capacity of more than 300 homes then it assumes that there will be two developers and the output will be doubled. Using these build-out rates means that a small number of large sites will not be fully delivered within the five years. The remainder would be delivered from year six onwards and is not factored into the five year supply. Only on sites with full planning permission and a signed Section 106 agreement (if applicable) will development be able to commence in year 1. Sites with outline planning permission, or sites where a Section 106 agreement is yet to be signed, will not be able to commence in year 1. It is anticipated that development will be able to commence on these sites as follows:

- Full planning permission, with signed Section 106 1-5 years
- Full planning permission, awaiting signing of Section 106 2-5 years
- Change of use, awaiting signing of Section 106 2-5 years
- Outline planning permission, with signed Section 106 2-5 years
- Outline planning permission, awaiting signing of Section 106 3-5 years
- Full planning application received and proposed allocation in emerging Local Plan 3-5 years
- Outline planning application received and proposed allocation in emerging Local Plan 4-5 years

This has resulted in a trajectory where the majority of completions will be delivered in the first fifteen years of the plan period, annual completion rates are lower after 2024 however, the total requirement is delivered over the plan period.

All references to phasing in the Local Plan will be removed; policy **H1** will be redrafted and there will be a cross reference to the SHLAA, which contains these assumptions.

With respect to paragraph **10.22**, it is useful to reference **Table 2** which contains a figure of 937 (11%) for allowances and unallocated sites.

The 937 homes comprises:

- Existing completions on small sites (0-9 homes) between 2011/12 – 2014/15 = 111
- Commitments / minded to approve on small sites (0-9 homes) = 296
- Allowance for small sites and windfalls (0-9 homes) = 480
- Long term empty homes re-entering the market = 50

Paragraph **10.22** includes 680 allowance for small sites and windfalls, this is a typographical error which should have read 480. The correct figure of 480 is included in **Appendix 2: Housing Trajectory**. This is an allowance for 40 homes per annum from year 6 of the plan period, this is based on past completion rates on these sites (development in gardens is not included in line with the Framework). Year 1-5 includes small sites for 1-9 homes as commitments. The council considers this approach entirely reasonable.

The Housing Requirement Number

The council welcomes the level of interest in the Housing Requirement Number, there were a good number of responses, with Parish Councils, the CPRE – Fylde District and residents saying the figure is too high, and the development industry saying the figure is too low. One planning consultant on behalf of a land owner stated that they were not commenting on the housing requirement number because the figure represented a significant uplift from the demographic starting point. No new evidence has been submitted.

Housing Number Too High

The five Parish Councils state that the figure is much too high, inspirational and totally unachievable and should be reduced accordingly, Medlar with Wesham Parish Council recommend a figure of 250 because historically this is the actual delivery figure. Previously developed land and unused employment land has been used instead of greenfield sites, to minimise the need for use of greenfield e.g. at the former Pontins and the former Marconi Site. The council has actively looked for previously developed land and carried out calls for sites but Fylde is not an industrialised area, therefore unused previously developed land is limited.

The employment land figure is covered in the response to policy **EC1** in Chapter 9.

The Planning Practice Guidance which is government policy requires Local Planning Authorities to use census data on population projections and household projections to calculate their future housing requirements, they are not permitted to use historic facts, in isolation. In particular, the country emerging from an economic recession and using historic data would involve projecting forward a period of decline, when the government is aiming to grow the national economy. The standard models used – Oxford Economics, Experian, Aecom etc. have been accepted when the evidence was examined at the Examination in Public, into Blackpool's Core Strategy, this is best practice, and is required by the NPPG. The affordable housing figure is 249 (paragraph **10.51**) not 420, affordable homes have been and will continue to be provided, however, the way that the Government defines and funds affordable housing has altered and this is having an impact. The affordable housing policy will be amended accordingly to reflect up to date national policy (see the response to policy **H4**). Preston Council also has a housing requirement, and all of the development in Preston close to Fylde's border is needed to meet Preston's requirement figure.

In response to Medlar with Wesham Town Council's comments about the buffer, this extra 20 per year will be referred to as headroom, see the response to paragraph **10.17**. The housing requirement figure of 370 is a minimum net requirement, the extra 20 homes per annum allows some flexibility.

The CPRE – Fylde District are of the opinion that the figure is based on unrealistic scenarios leading to an unreasonably high figure. They reference the caveats in the Housing Requirement Paper 2015 and recommend that the figure should be 250 homes per annum. It is important to note that the Housing Requirement Paper contains housing market signal

testing (as set out in the PPG) and this testing is used by the council to justify why the figure of 370 is the correct figure. Those tests cannot be used to reduce that figure to 250.

The council has revisited the housing number for Elswick and is proposing to reduce it to 50 (which is dealt with in Chapter 7).

Fylde is not meeting targets appropriate for the south east of England, Local Planning Authorities in the south east of England are having to provide land for tens of thousands of homes. The housing requirement figure is a product of the ONS data for Fylde. Sites that are under construction are being completed and sold. Some farmland will be built on, but having an up-to-date adopted Local Plan will mean that the land that is developed is in sustainable locations. All areas of the Borough are contributing towards the target, with Kirkham contributing 14%, Lytham St Annes 25% and Fylde -Blackpool Periphery 25%.

Another resident comments that more retired and economically inactive people will be attracted to the area. Otherwise the area will attract in commuters with pressure on highways which is unsustainable. Fylde already has high numbers of economically inactive people, and there are disproportionately high numbers of people in the 40-50 year age group who are likely to retire during the plan period. Fylde's economy will continue to lose jobs unless a sufficient number of homes are built to help stabilise the economy.

The Housing Number is Too Low

Allowances for windfalls and build-out rates have been dealt with in the general comments on the housing number, the council has collected evidence to justify its approach which is considered realistic and reasonable. The 'buffer' of 20 homes is not a buffer for persistent under delivery in the terms referred to in the housing land supply calculation and the Housing Delivery and Allocations Section of the Publication Version of the plan will refer to this small number of extra homes as "headroom", the council does include a buffer of 20% in its Five Year Supply calculation.

The NPPG requires council's to collect evidence in order to produce a housing requirement figure. The evidence base documents are:

- The Fylde Coast Strategic Housing Market Assessment 2013
- The Analysis of Housing Need in Light of the 2012 Sub National Population Projections Addendum 1 2014
- The Analysis of Housing Need in Light of the 2012 Sub- National Household Projections Addendum 2, 2015
- Fylde Housing Requirement Paper 2015

None of the respondents have questioned the evidence presented in these documents, or provided new evidence, however, they have questioned the way in which the evidence is interpreted.

All of the responses were from the development industry (landowners, planning consultants and developers) and they question whether the figure of 370dpa is sufficient to meet the council's and the wider LEP's growth targets and the need for affordable housing.

Other points raised include:

- Whether the figure would reduce unemployment;
- Blackpool has used Oxford Economic Projections and therefore so should Fylde;
- The SHMA is based on a period up to 2030, the Local Plan runs until 2032;

First of all it is important to note that the purpose of the Local Plan is not to meet the LEP's growth targets. There is no explicit obligation for the council to meet the LEP growth targets through its housing number. The council must meet its Objectively Assessed Need and take account of economic predictions. The SHMA, Addendums 1 and 2 and the Housing Requirement Paper justify the Objectively Assessed Need of 370 homes per annum and take account of economic predictions.

Secondly the relationship between jobs and workers is very complex. The numbers of workers and the numbers of jobs over the plan period will never be equal. The economic projections in the SHMA consider this from the demand side for example what will happen to various employers in different sectors of the economy during the plan period. The SHMA also considers the supply side for example how will the working age population change? More jobs does not necessarily mean more workers needing to live in the area. Jobs can be created and taken up for variety of reasons including: by reducing unemployment, people working longer before retirement and for specialised jobs – people choosing to travel into Fylde from both and short and long distances.

The council took the findings of Addendum 2 and carried out a reality check on the economic characteristics of the area. This is presented in the Housing Requirement Paper and has not been questioned by any of the respondents, a short summary of the main points is provided.

The local economic context is considered unusual in many respects. Usually the functional economic area would correspond closely to the Housing Market area as is often the case for a large conurbation. For Fylde travel to work patterns are extensive and the main employers are concentrated close to the Borough's boundaries at Salwick and Whitehills (a 15 minute drive from the M6), these locations generate journeys which cover at least two Local Authority areas. The Enterprise Zones will operate at the national level in terms of the supply chain, investments and travel to work leading to the conclusion that Fylde's functional economic area is at least regional if not national.

Secondly there is a consideration of economic trends which is vital if the Local Plan is to be based on reality. From 2001-2011 there has been an average loss of employment of 48 jobs per year, at the same time an average of 245 homes per annum have been completed and there has been an annual historic take up 2.49 Ha of employment land. The construction of homes is not resulting in growth of the local economy and although more land is being used for economic development purposes this land is making less use of capital and labour (this is supported by further evidence in the SHMA and FELPS).

Thirdly, commuting assumptions, from the Census approximately 50% of people who live in Fylde work in Fylde and therefore 50% of those who work in Fylde do not live in Fylde. Changes to commuting ratios will be influenced by a range of factors over the plan period e.g. The Warton Enterprise Zone which given its specialist nature will draw labour from a much wider area, this is also true of the Enterprise Zone at Blackpool. Also the construction of the Preston Western Distributor road which will make it much faster and easier for workers to commute into Springfields and the Warton Enterprise Zone from a regional if not national labour market.

Finally with respect to neighbouring authorities' policies and plans, Blackpool Council have requested that Fylde make provision for 14 Ha of employment land to meet their predicted future demand. It is reasonable to expect that a considerable amount of any predicted jobs growth would draw workers from Blackpool as a result of this particular request being fulfilled and having regard to the location of employment land allocations close to the borough boundary.

Given the four points above (which are set out in more detail in the Housing Requirement Paper and which set out why Fylde is unusual, it can reasonably be concluded that the functional economic area of Fylde is at least regional if not national. The relationship between jobs and land is not a proportional one for Fylde, there isn't therefore the formulaic need to provide homes in relation to the allocation of employment land. Workers will continue to commute over long distances to Fylde because, in general, well paid work makes commuting worthwhile and there is easy access via the motorway network. Most Local Planning Authorities would aspire to achieve balanced commuting, however, Fylde has a unique set of circumstances and a functional economic area that extends well beyond the north west of England. This means that although Fylde aspires to grow its economy it is unlikely that these new workers will live within the Council's area and housing will not need to be built to accommodate them. This represents a housing market driver that needs to be considered at a more strategic level.

The Housing Requirement Paper then takes account of market signals as set out from Paragraph 019 of the PPG. It considers affordability in terms of house prices, rents and affordability and concludes that the figures are not signalling a particular imbalance between the demand for and supply of homes.

Turley also included an assessment of market signals in Addendum 2 and concluded:

Overall, therefore, while there is little evidence to suggest that there has been a significant worsening of market signals in Fylde, a modest uplift applied to the household projections could help to address affordability issues in the borough, and can ensure a relatively constrained position – in terms of backlog against planned supply is not projected forward.

None of this evidence has been questioned by any of the respondents. Fylde Council, therefore, continues to conclude that it does not need to increase its housing requirement number in order to address the need for affordable housing.

The Housing Requirement Paper also considers rates of development and completions expressed as a percentage of commitments. Completions expressed as a percentage of commitments is demonstrating an interesting trend. Commitments increased by 173% (859 to 2,343) from 2011/12 – 2012/13 and in the same period completions as a percentage of commitments fell from 16% to 7%. Commitments then increased again by 50% (2,343 to 3,525) from 2012/13 – 2013/14 and completions remained at 7% of commitments. For 2014/15 commitments have increased again to 3,864 and completions have fallen to 5% of commitments.

The development industry have not commented on this aspect of the housing market signals work, however they have requested that the housing requirement figure is increased. There have also been comments from the development industry that the build out rates in the trajectory are too high. It would have been useful to have some feedback on the realistic annual completion rates that the development industry could achieve throughout the plan period. The council's own monitoring demonstrates that the build out rates set out in the SHLAA are currently being realised.

Other comments were that the housing requirement figure does not provide scope to reduce the rate of unemployment. Fylde's unemployment rate is 3.5% (2015), this is already very low with the northwest at 5.9%. Unemployment is not a significant issue for Fylde, it is very low and the Council is more concerned about stabilising the economy.

Another respondent stated that the council should use the Oxford Economic forecasts because Blackpool had used them. This is not a good reason to use the Oxford Economic forecasts. Figure 5.26 – Index of Employment Change – All Authorities 2011-2030 demonstrates that there was no consistency between the two economic forecasts for the three authorities.

A housing developer comments that the SHMA is based on a period up to 2030, whereas the Local Plan is based on a plan period is up to 2032, there is therefore a need for additional evidence to justify this extension and the further implications for the Council's housing needs and supply. Paragraph 1.8 of Addendum 2 explains that it is important to note that when considering the modelling outputs presented in this report, that the projection period for which results are presented has been changed to 2011 – 2032 as opposed to 2011 2030 in the SHMA and Addendum 1.

Recommendations for change

- The housing requirement figure will be expressed as a net figure.
- A figure of 7,770 will be used throughout the plan for clarity.
- Housing and Employment Policy references will be included on the **Policies Map** to provide greater clarity.

- All references to ‘phasing’ will be removed from the Local Plan, there will be a cross reference at paragraph **10.15** to the assumptions on lead in times and build out rates in the SHLAA.
- The figure of 680 in paragraph **10.22**, will be corrected to reflect the total allowance for small sites and windfalls in the updated trajectory.

Policy H2 Density and Mix of New Residential Development

Number of representations:

Comment	Support	Object	Total
11	4	8	23

Representations received from:

- Home Builders Federation
- Bryning with Warton Parish Council
- National Custom and Self Build Association
- 1 Landowner
- 4 Developers
- 1 Action Group
- 2 Residents

What you said

Density

*The Home Builders Federation and a developer supported the inclusion of the word ‘normally’ with respect to density, this provides flexibility. They then go on to comment that the desirability for executive style housing to retain employers and employees should be considered and the requirements to meet the national minimum space standards in policy **GD7**.*

A developer supported the maintenance of realistic and deliverable density levels.

A developer commented that the density range is too high for Local Service Centres and Tier 1 and Tier 2: Rural Settlements. The policy fails to allow for consideration of the specific form and character of individual settlements, it should be removed or the Council should prepare a credible evidence base to justify its proposed requirement for each settlement.

Mix

The Home Builders Federation and a developer recommended that because the SHMA will become out of date reference should be made to local needs at the time of the development, market and viability.

A landowner commented that it is far too prescriptive to suggest that every single development site has to comprise a specific number of 1 and 2 bedroom homes, and homes for the elderly, on both commercial and viability grounds.

A developer stated that the section on mix is inappropriately requiring affordable house types, without the requisite affordable provision policy. This text should be moved to policy H4.

A developer objected to the emphasis placed on small family homes which has the potential to delay the delivery of affordable housing in sustainable locations. It does not accord with Paragraph 14 of the Framework and should therefore be deleted.

Special Needs Housing and Specialist Retirement Accommodation

The Home Builders Federation supported the provision of housing for older people and other specialist needs. However, they objected on the grounds that the policy and supporting text are unclear on what the 20% requirement entails. Further guidance on the interpretation of this policy may be beneficial, references in the reasoned justification to the types of accommodation deemed to meet this need would assist in this regard. A developer also commented that the policy and supporting text are unclear what the 20% requirement actually entails. If the council were to interpret this as a requirement for the optional buildings regulations standards upon accessibility this would need to be formally tested through the plan, based on appropriate evidence. The NPPG identifies which criteria must be considered through the examination process to enable the introduction of the optional standards.

Bryning with Warton Parish Council commented that Warton has 800 approved developments in ratio to what is required and none of which meet the genuine needs of policy H2, in particular the elderly where there does appear to be a shortage in appropriate housing. This is presumably because of the absence of the infrastructure of easily accessible public transport, health facilities and retail opportunities of a 'Local Service Centre'.

An Action Group objected and stated why has it been so hard (with 6 building sites in Wrea Green since 2011) to get this type of accommodation, it was mentioned in the draft Neighbourhood Plan and the 2012 Housing Need Survey.

A developer remained in agreement with the policy and the council's admittance that specialist accommodation is needed in Fylde however, we remain concerned that the justification to this policy (paragraphs 10.28 to 10.33) remains negative and contradicts itself.

Community Self Build

*The National Custom and Self Build Association commented that policy **H2** does not mention those that wish to build their own home but are unable to do so as part of a community scheme, the plan is therefore not consistent with national policy.*

*Furthermore, the plan cannot be said to be positively prepared as there has been no attempt to measure the demand for self-build in the borough, if it is not assessed it should be assumed that there is some demand. As a consequence of this failure to identify demand there is no provision for self-builders on large sites in the way that there is for those unable to build their own home by the way of affordable housing. Also the plan does not allow custom – or self-build on rural exception sites which would provide a more affordable route for those that are unable to afford a new market home and unable to secure an affordable home. A requirement for large developments to include the provision of a percentage of self-build plots (perhaps 5%) should be added to policy **H2** to meet the demand for self-build.*

A landowner commented that the council cannot suggest that developer contributions need to be provided for self-build schemes this would not be CIL compliant.

Justification

For clarity these responses are in paragraph order and the paragraph number is included in brackets.

*A resident commented that to sustain vehicular access proper safe cycle ways are needed, not white lines or shared pavements, these do not work. Proper cycle ways, with kerbed boundaries will also help reduce vehicular access as the more cyclists will reduce the space for traffic and encourage more cycling (paragraph **10.27**).*

*A developer objected to paragraphs **10.28** to **10.33** on the grounds that they are counterintuitive. They contest the Council's assertion that the development of flats is driving the in migration of retirees into Lytham St Annes, retirees are attracted for a variety of reasons. The Council considers that 80% of households are under-occupied, household size is decreasing, in tandem with an aging demographic profile and new homes tend to be larger, it would appear that smaller specialist accommodation for the elderly that releases larger family housing back into the market would be highly beneficial for the Authority. It makes sense that older owner occupiers in rural areas would look to move to areas with greater accessibility to shops and services to prolong their independence. Lytham and St Annes are the most suitable locations. Focussing the provision of medium sized family housing in the most suitable locations for specialist housing will encourage elderly persons to purchase and continue to live in unsuitable accommodation in order to have access to services. By focusing on family housing which, demographically, is a lesser priority than specialist accommodation for the elderly, the council will at least disadvantage existing elderly residents within the district who need to move into specialist accommodation.*

An Action Group objected – this was identified in Wrea Green 3 + years ago and has FAILED to be planned for or delivered. Now all the appropriate sites are full of 4/5 bedroomed detached

homes so it is now too late! (paragraph 10.38). They also object to the fact that paragraph 10.40 was not applied to recent developments in Wrea Green, instead approvals given will overwhelm service and the infrastructure.

A resident stated that paragraph 10.35 is a very restricted view of the expression 'self-builder'. Normally the term includes people who directly fund the building of their own home rather than actually build it.

Council response

Density

The council welcomes the support of the Home Builders Federation and two residential property developers for the flexibility in the policy. The SHMA contains a lot of evidence about the types of homes that will be needed in the plan period, Table 4.2 sets out the types of homes found in Blackpool, Fylde and Wyre. The proportion of detached housing in Fylde is higher than both the national and Fylde Coast averages. Figure 7.22 sets out the estimated size of properties required in Fylde. In fact, the greatest need (approximately 60%) is for two and three bedroomed properties rather than for executive style housing. The comment on the National Technical Standards is noted.

A minimum density of 30 homes per hectare is not considered too high for Local Service Centres and Tier 1 and Tier 2: Larger and Smaller Rural Settlements, respectively. It is important that the Local Plan makes efficient use of land. The SHMA sets out a wealth of evidence on the current profile of properties in Fylde and a detailed breakdown of what will be needed in the future. For Fylde it is predominantly two and three bedroomed properties. In particular this will allow for older people to downsize, whilst remaining close to friends and family, releasing larger properties for families. Smaller properties can readily complement the specific form and character of individual settlements. The Local Service Centres and Tier 1 and Tier 2 settlements do include many smaller homes in the form of traditional terraces, former estate workers homes and cottages. It will therefore be easier to respect the specific form and character of these settlements by building at 30 homes per hectare than it would be at lower densities with larger properties.

Mix

The council agrees that there should be reference to the use of updated needs assessments that are produced within the plan period. With respect to the issue of viability the whole local plan was subject to Viability Appraisal, and the overall conclusion was that it was deliverable.

With regard to mix the policy states that a broad mix will be required on all sites to reflect the demographics of the Borough. On sites of less than 100 homes the Council requires a mix that makes a positive contribution to the vitality of the community. In the settlements the policy says that one, two and three bedroomed homes with private amenity space should be included in the mix. Again in rural areas a mix should be provided in particular small family homes with private amenity space. Figure 7.22 in the SHMA sets the estimated size of properties required in Fylde, the greatest need is for two and three bedroomed properties.

Policy **H2** does not state that a specific number of one and two bedroomed properties will be required, it reflects the evidence presented in the SHMA.

Figure 7.22 in the SHMA, demonstrates that about 60% of the need is for two and three bedroomed homes. The evidence in the SHMA is intended to meet projected needs to 2030. It is acknowledged that it will become out of date therefore reference will be made in policy **H2** to any more up-to-date housing needs studies that are carried out in the period to 2032.

The section on mix does include a reference to tenure and affordable housing and these references will remain in policy **H2** as both are a component of housing mix.

The evidence presented in the SHMA highlights that the need is for 2 and 3 bedroomed homes. In particular smaller homes are needed in the rural areas so that, if they wish to, older people can downsize to a property with a garden whilst remaining close to family and friends. This then releases larger homes for families into the market. Paragraph 14 of the Framework states that Local Planning Authorities should positively seek opportunities to meet the development needs of their area;

The council has provided the evidence which shows that smaller properties are needed, it would not be meeting the development needs of the area if it ignored that evidence.

The council will continue through the development management process to seek to deliver a wide range of house types to meet the needs of local communities.

Special Needs Housing and Specialist Retirement Accommodation

The council agrees that it should be clear what is meant by 'homes designed specifically to meet the needs of the elderly'.

The policy does require that 20% of homes in developments of 15 or more should be designed to accommodate the elderly. Government policy has changed since the Revised Preferred Option was written, the National Technical Standards for Housing, were introduced in October 2015, these include optional standards for Access and Water, there is also an Optional Nationally Described Space Standard for Internal Space Standards. These optional standards, if introduced make homes more suited to the needs of elderly people.

The council is reviewing its evidence base and the scope of the Affordable Housing will be expanded to cover this issue.

The council will continue through the development management process to seek to deliver a wide range of house types to meet the needs of local communities, this will include the needs of elderly people.

Bryning with Warton Parish Council comment that there is a shortage of housing for the elderly in Warton. The council would welcome the opportunity to work with the Parish Council to collect evidence of the scale of this need so that it can be addressed in future.

The council notes the Action Group's objections.

The council welcomes the support of a developer for the policy. The comments on the reasoned justification are covered in the following section of the council's response.

Community Self Build

At the time of writing the term Community Self Build was correct. Custom and Self Build has risen up the current government's agenda since the Revised Preferred Option was written. The Self-Build and Custom Housebuilding (Register) Regulation 2016 was released on 4 February 2016. The council is required to have a Register for Custom and Self Builders in place by 1 April 2016.

The council will assess the demand for self-build and then consider the most appropriate methods for meeting this demand.

Justification

The comments on cycle ways are dealt with under policy **T3** in Chapter 12 and in the IDP.

With respect to the objection to paragraphs 28 – 34 the council makes it clear that the large number of flats is one factor which attracts retirees to Lytham and St Annes, retirees are attracted for other reasons for example there are lots of activities for retired people and crime rates are low. The council's Housing Service have carried out Housing Needs Surveys in some of the rural villages and they revealed that many of the elderly people in the villages did wish to downsize to smaller homes within their village. They wanted to stay close to family and friends and did not express any desire to move to Lytham St Annes. The provision of flats suitable for retirees has been a factor in attracting high numbers of elderly people to Lytham St Annes. This has had a detrimental impact on the local environment with traditional detached homes being replaced with modern blocks of flats, particularly in St Annes and along the coast to Lytham. There is already plenty of this type of accommodation in St Annes and it has made up a high proportion of recent completions. The objection commences by contesting that the development of flats attracts retirees, it then refers to smaller specialist accommodation for the elderly. Many of the flats built in Lytham St Annes are not small and neither are they specialist accommodation. The council accepts that some small specialist accommodation will be required however, rather than building more flats (which are not small or specialist) the evidence in the SHMA Figure 7.22 demonstrates that about 60% of provision should be two and three bedroomed homes. These should be homes with outdoor space which will be attractive to both families and retirees looking to downsize. This will help deliver a wider choice of high quality homes, widen opportunities for home ownership and create inclusive and mixed communities, as required by the Framework paragraph 50. The need for small specialist accommodation is referred to in paragraphs **10.38 - 10.40** of the Local Plan.

The objection by the Action Group in relation to paragraphs **10.38** and **10.40** is noted.

The resident’s objection to paragraph **10.35** is covered in the response to Custom and Self-Build within policy **H2**.

Recommendations for change

- In relation to mix, reference needs to be made to up-to-date housing need surveys that are carried out in the period up to 2032.
- The text on Custom and Self Build will be updated

Policy H3 Conversions and Change of Use to Residential

Number of representations:

Comment	Support	Object	Total
1	0	1	1

Representations received from:

- Council for the Protection of Rural England (CPRE) – Fylde District
- 1 Action Group

What you said

*CPRE – Fylde District recommended that policy **H3** Conversions and Change of Use to Residential should acknowledge that provision of new homes may also come from the re-designation of holiday homes, typically park homes.*

*An Action Group objected - This is a plan from 2011 to 2032 so are current economic conditions relevant? (paragraph **10.47**)*

Council response

With respect to the CPRE – Fylde District response, the council considers that holiday homes are an important part of the tourism economy and they should not therefore be included in policy **H3**.

Current economic conditions are entirely relevant, the country has only just come out of recession. People are moving around the country to find work and they need the flexibility of high quality rented accommodation to enable them to move into an area for work, even if it is only for a short period.

Recommendations for change

- Amend the second paragraph of policy **H3** to read ‘and the promotion of good design’

Policy H4 Affordable Housing**Number of representations:**

Comment	Support	Object	Total
13	4	8	25

Representations received from:

- Blackpool Council
- Medlar with Wesham Town Council
- Blackpool, Fylde and Wyre Trades Union Council
- National Custom and Self Build Association
- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner
- 1 Planning Consultants
- 4 Developers
- 1 Action Group
- 2 Residents

What you saidGeneral Comments

*The National Custom and Self Build Association commented that the evidence for the Local Plan does not make any reference to custom and self-build and there is no indication that the council has tried to establish the need for self-build. Policy **H4** does not include the provision of any version of affordable custom or self-build. It also stipulates that 100% affordable housing rural exception sites will be permitted where a need has been proven but does not include affordable custom or self-build as forms of residential development that would be considered appropriate. Self-build homes proposed on such sites could be permitted with conditions capping the resale value and limiting the sale to those with local connections in order to increase the supply of affordable housing for local people. The Local Plan does look to meet the needs of those who wish to build their own home, but this is limited to community self-build projects, the needs of those who wish to build their own home, but that are unable to do so as part of a community scheme are not catered for.*

The CPRE – Fylde District, a planning consultant and a developer commented that the plan must take full account of the Government’s emerging objectives for affordable housing having regard to the requirements set out within the emerging Housing and Planning Bill for the

provision of starter homes for first time buyers. The CPRE- Fylde District understand that these may be classed as low-cost market housing outside the definition of affordable homes and that the council will have a duty to deliver 'starter homes' as part of new housing developments.

An Action Group objected because 'Pepper-potting' (paragraph 10.65) has NOT been the approach for any of the approved sites in Wrea Green, and really needs to be implemented, this has been pointed out on a number of occasions as it is a standing process, but then ignored.

A resident objected to the policy stating that there appears to be no appetite for developers to build the social housing and affordable housing that is expected by planning approvals, this needs to be addressed. Perhaps one way would be to insist that after 50% of the development has been constructed, the social and affordable housing should be completed before the remainder of the development is allowed to continue.

The Amount of Affordable Housing

Medlar with Wesham Town Council objected and state that the level of 249 for Fylde is far too high and will never be delivered, particularly in the current climate with housing associations not taking up 106 agreements. This figure needs to be reduced. They also question the methodology that produced the need.

Bryning with Warton Parish Council commented that section 10.50 indicates a Warton need of 59 affordable dpa based on Addendum 1 of the SHMA, yet actual experience with the professional bodies indicates there is no such requirement and no need of such local provision. The analysis can only be concluded to be seriously flawed supporting the inaccurate methodology of future housing requirements, this impacts significantly on Warton.

The Blackpool, Fylde and Wyre Trades Union Council which represents about 25,000 trades union members welcomed new development in the Fylde, including new homes and jobs, however, enough social housing should be included in the plan to take account local need and the quite dramatic drop in the proportion of owner occupiers over the last number of years.

An Action Group objected to the number and states that 370 – 249 leaves only 121 market homes as the requirement and the supply far exceeds the demand already, evidenced by the slowing building rate. Affordable homes should be built where there is employment and infrastructure and not just ANYWHERE and that proposed homes are of a type and tenure to meet any demand. There needs to be full agreement prior to approval as to the percentage of affordables and prior agreement with a Registered Provider to take on the affordables once these are constructed. These matters should NOT be dealt with post approval.

A resident objected to policy H4 and states that the affordable housing number no longer makes sense and the policy must be adjusted. Over recent years obligations to provide 30% have rarely been met and quite often has been reduced considerably.

On Site Provision of Affordable Housing

A developer supported the principle of delivering affordable housing on site in Tier 1: Larger Rural Settlements, however, they comment that there should be the flexibility to deliver off site, or via a contribution in lieu of onsite provision should the level of identified need be less than 30%. The offsite contribution would then be used to provide affordable housing in another settlement of greater need.

Tenure

A landowner commented that many of the developers delivering the approved strategic housing sites have experienced significant difficulties in finding and securing social housing providers prepared to take on social rent properties. Under these circumstances a minimum threshold of 80% is not considered appropriate or feasible. In particular the recent announcement on the Housing and Planning Bill which emphasises the government's commitment to alternative forms of affordable housing provision. It is therefore considered unjustified to specify tenure mix in the Local Plan.

A planning consultant commented that the flexible case by case approach must be supported by up-to-date evidence and regular correspondence between council officers and Registered Providers to ensure that each scheme properly reflects the local market and requirements of affordable housing providers; and can be agreed in a timely fashion, as the current process for negotiating housing tenure within Fylde has led to delays, this section should include a reference to this.

A developer supported the text relating to the tenure of affordable housing stating that; The precise requirements for the tenure of affordable homes will be negotiated on a case by case basis, having regard to the viability of individual sites and local need. They then go on to comments that the subsequent text stating that; at least 80% of the affordable homes should be for housing association rented, is not justified and is unnecessary and should be deleted from the policy.

Viability

A landowner and a developer considered it unreasonable that the applicant should meet the cost of the independent verification of evidence which the council is requesting when they have already paid an application fee, this requirement is unjustified and has the potential to stall the delivery of development, and should therefore be deleted.

A planning consultant, and a developer supported the fact that the policy does include flexibility by referring to viability, but then goes on to comment that it is imperative that the policy requirement is set at a level which delivers in the majority of cases.

*An Action Group objected because paragraph **10.67** has NOT been the approach for ANY of the approved sites in Wrea Green and really needs to be implemented. This has been pointed out on a number of occasions but then ignored.*

Calculation of Commuted Sums

Blackpool Council commented that paragraph 10.71 states that financial contributions may be considered acceptable where the site is deemed by the Council to be unsuitable for affordable housing. However, this could be broadened to include circumstances where a commuted sum could meet other housing policy objectives, as referred to in paragraph 10.68 of the RPO.

An Action Group objected and stated that this appears to be out of date according to the sums I have seen (£50,000 per property) and is now delayed instead of being made available now.

A landowner commented that the explanation of how off site affordable housing is calculated is unclear. It is considered that such a calculation should be contained in a guidance document rather than the Local Plan.

General Comments

The council welcomes the detailed comments it has received on its Affordable Housing policy.

With respect to the comments from the National Custom and Self Build Association the council will assess the demand for Custom and Self-Build by setting up a Register, the description/definition of Custom and Self-Build will also be updated as set out in the response to policy H2.

The Publication version of the Local Plan will take full account of the Government's objectives for affordable housing by having regard to the requirements set out in the emerging Housing and Planning Bill for the provision of starter homes for first time buyers.

The objection to paragraph 10.65 from the Action Group is noted. It is not always possible to 'pepper pot' affordable provision. The definition of affordable housing is changing to include starter homes which may be more easily integrated into larger developments.

With respect to the resident's objection, recent Government changes around rent restructuring has meant that Registered Providers (RPs) have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the RP sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The Government is also in the process of changing the definition of affordable housing to include starter homes which will provide better financial returns to developers. The provision of affordable housing is undergoing significant change, the Council is monitoring the emerging Planning and Housing Bill, and the Local Plan will be amended to reflect its requirements.

The Amount of Affordable Housing

The SHMA included an assessment of the need for affordable housing which suggested that there was a net annual affordable need for 207 affordable homes per annum over the first five years of the plan falling to 204 per annum once the backlog was cleared. A key component of this calculation is the gross household formation rate, which was updated in the 2014

Addendum 1 report to take account of the 2012 – based population projections, this increased the need from 207 to 249 homes per annum.

The council notes that no new evidence has been presented in relation to the need for affordable housing.

Medlar with Wesham Town Council and the residents objections are noted, recent Government changes around rent re-structuring has meant that Registered Providers have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the Registered Provider sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The affordable housing number will be changed if the evidence changes, it should not be adjusted or reduced because there are difficulties with delivery. Medlar with Wesham Town Council have not explained how the methodology needs to be changed.

With respect to Bryning with Warton Parish comments the figure of 59 affordable homes per annum is for Kirkham and Wesham and Freckleton and Warton (not just Warton), the council is not aware of any evidence from the professional bodies that the figure should be lower. However, it is willing to appraise any new evidence. This figure does not impact on the annual housing requirement figure, the council and Turley have carried out Housing Market Signals Testing on the Housing Requirement Figure which concluded that the objectively assessed housing need figure (370), did not need to be subject to an uplift in order to meet the need for affordable housing.

The council welcomes the comment from the Blackpool, Fylde and Wyre Trades Union council, which welcomes new development in Fylde, including new homes and jobs, and also comments that enough social housing should be included in the plan to take account of local need and the quite dramatic drop in the proportion of owner occupiers over the last number of years.

With respect to the action group's objection, the annual housing requirement figure of 370dpa has been tested by both the council and Turley and this testing revealed that 370 homes per annum would deliver sufficient affordable housing. This testing is set out in Addendum 2 (Turley) and the Housing Requirement Paper 2015. This evidence has not been questioned. Affordable Housing is also provided by the private rented sector and this will make up the remainder of the requirement. New affordable homes will be built where there is employment and infrastructure with 80% of them being built at the strategic locations for development. Planning consents do detail how affordable housing will be provided, however, recent Government changes around rent re-structuring has meant that Registered Providers have had to significantly reduce their offers for S106 rented homes, due to lower long term rental incomes. These changes have resulted in wide-scale uncertainty within the Registered Provider sector and have greatly increased the difficulty in securing offers for affordable homes on private sector housing schemes. The council cannot force developers or Registered Providers to enter into unviable arrangements and the council is reviewing its policies in order to facilitate the provision of affordable housing.

On Site Provision of Affordable Housing

The developer's comments are noted. The policy does offer flexibility because it states that where the applicant has submitted robust evidence to demonstrate that the application site or location is unsustainable for affordable or Special Needs Housing; OR there is no locally identified need, the affordable housing contribution or the balance of that contribution, will be expected to be delivered elsewhere in the borough.

Tenure

The council agrees that given the recent changes to Government policy it is unreasonable to require that 80% of the affordable homes should be for housing association rented; the remainder would be at a tenure to be agreed with the council. The council awaits the emerging Housing and Planning Bill and the Local Plan will be redrafted to reflect the Government's commitment to alternative forms of affordable housing provision.

The planning consultant's comments are noted, the council is committed to collecting up-to-date evidence and having on-going dialogue between council officers and registered providers. A paragraph mentioning this on-going commitment will be included at the start of the justification for on-site provision.

Viability

The council does not consider it unreasonable to include a statement in the policy requiring that the applicant provide robust evidence of the viability of a scheme, when they are seeking the approval of a scheme with lower levels of affordable housing than the policy requirement.

The council agrees that it is imperative that the policy requirement is set at a level which delivers in the majority of cases. The council is awaiting the emerging Housing and Planning Bill, affordable housing policy will be rewritten to reflect the requirements of the Bill, and the viability of this policy will be tested when the Local Plan is published.

The objection from the Action Group is noted, the council is collecting evidence on the need for accessible homes in accordance with the NPPG. This evidence will inform a decision on whether or not to implement the optional accessibility standards. These accessible homes are suited to the needs of elderly residents.

Calculation of Commuted Sums

The council notes Blackpool Council's comment.

The council agrees that the calculation of commuted sums should be set out in a guidance document. Paragraph **10.71** states that the formula for calculating the commuted sums *in-lieu* of on-site provision will be set out in the Affordable Housing Supplementary Planning Document, which will be prepared and issued for consultation in 2017.

The calculation of commuted sums will be affected by the Housing and Planning Bill as starter homes will be included in the definition of affordable homes so this will affect the proportion to be provided for rental by registered providers.

The objection made by the Action Group is noted. The council agrees that its draft Affordable Housing policy is out of date given the emerging Housing and Planning Bill.

Recommendations for change

- Policy **H4** will be updated to reflect the changes introduced by the emerging Housing and Planning Bill.
- The council is committed to collecting up-to-date evidence and having on-going dialogue between council officers and registered providers. A paragraph mentioning this on-going commitment will be included at the start of the justification for on-site provision.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text on Affordable Housing in Chapter 10, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend section ii) in policy **H4** by deleting ‘~~Elswiek~~’ from the list of **Tier 1 Larger Rural Settlements** and adding ‘Elswick’ to the list of **Tier 2 Smaller Rural Settlements**.
- Amend the text under **Tenure** in policy **H4** to read: ‘The precise requirements for tenure of affordable homes will be negotiated on a case-by-case basis, having regard to the viability of individual sites and local need. ~~At least 80% of the affordable homes should be for housing association rented; the remainder would be at a tenure to be agreed with the council.~~ Where an element of affordable housing is required, the proportion of rented properties should reflect what Registered Providers are able to provide; the remainder to be at a tenure to be agreed with the council.’
- Amend the text under **Design** in policy **H4** to read: ‘All new affordable homes should comply with ~~all relevant design and quality codes and standards set out by the Homes and Communities Agency or other relevant body,~~ as well as the National Technical Standards; and the requirements for design set out in policy GD7.’
- Amend the first sentence of paragraph **10.55** to read: ‘The definition of affordable housing is set out in Annex 2 of the Framework and repeated in the Glossary to this Local Plan.’

- Amend text in paragraph **10.63** to read: ‘the proportion ~~for~~ of social rented properties’
- Amend paragraph **10.64** to read: ‘Where affordable housing is provided the mix in terms of tenure, type and size must reflect the assessed needs, as set out in the SHMA or the most up-to-date data available in the Council’s evidence base, ~~which is currently as a majority of one, two and three bed properties~~. The council will negotiate the exact tenure, type and size split on each site through discussions.’
- Amend the last sentence of paragraph **10.65** to read: ‘...appropriate layout ~~and phasing~~ of development ...’
- Amend the third sentence of paragraph **10.66** to read: ‘Such housing should comply with all relevant ~~design and quality codes and standards set out by the HCA or other relevant body, as well as relevant~~ national technical standards and where appropriate, local standards.’
- Add the following text to paragraph **10.71**: ‘or to enabling empty homes to be brought back into use.’

Policy H5 Gypsies, Travellers and Travelling Showpeople’s Sites

Number of representations:

Comment	Support	Object	Total
3	0	2	5

Representations received from:

- The National Federation of Gypsy Liaison Groups
- The National Farmers Union (NFU)
- The Council for the Protection of Rural England (CPRE) – Fylde District
- Lancashire County Council - Planning
- 1 Travelling Showperson

What you said

Lancashire County Council has reviewed its land holdings and has confirmed that it does not have any land suitable for the provision of Gypsy and Traveller Pitches in Fylde.

*The National Federation of Gypsy Liaison Groups objected to policy H5, it is not compliant with planning policy for Traveller Sites which requires that Local Plans must set out criteria to be used in determining applications that come forward irrespective of need. Policy H5 sets out criteria which will only be applied in the absence of sufficient sites coming forward to meet the identified need and **criteria (a)** requires that there is evidence of need for a new Gypsy, Traveller or Travelling Showpeople's site". The policy does not meet the guidance in the PPTS, the reference to identified need must therefore be removed. Criteria (b) is unacceptable in restricting sites within "An Area of Separation". Criteria (d) is too restrictive. It should not say not significantly harm...."The Policy should also acknowledge that regular reviews of the need will be undertaken and that steps will be taken to deliver sites in accordance with changing circumstances. The policy should also acknowledge that the need identified in the GTAA represents a minimum level of provision.*

The National Farmers Union commented that there is a need to ensure that provision is also made for the associated livestock when selecting sites. When this isn't taken into account it can often lead to issues with fly-grazing, which is not only a form of trespass but also has biosecurity implications.

CPRE – Fylde District commented that it is the responsibility of the Local Plan to allocate suitable Gypsy, Traveller and Travelling Showpeople sites, otherwise such sites should not be allowed as an exception to restrictions for development in the Fylde countryside. We highlight that there are ongoing negative impacts associated with the site in the countryside area at Fairfield Road, Hardhorn.

The Travelling Showperson did not agree with criterion f) of policy H5 as in some cases smaller sites for Travelling Showpeople would be ideal.

Council response

The council notes that LCC has stated that it does not have any land suitable for Gypsy and Traveller pitches in Fylde.

With respect to the points made by the National Federation of Gypsy Liaison Groups, the definition of a Gypsy, Traveller and Travelling Showperson has changed. The council (along with Blackpool and Wyre Councils) has commissioned Opinion Research Services to carry out an update of the Gypsy and Traveller Accommodation Assessment (GTAA), in order to align it with the new definition. The policy (H5) has been used to approve two sites for Gypsies in Fylde, one in the countryside between Wrea Green and Warton and another at Newton (the Inspector gave significant weight to H5). Once, the council has an updated GTAA policy H5 will be updated to reflect the requirements of the emerging Housing and Planning Bill and the up-to-date evidence of need, it will also be amended to reflect the fact that the updated identified need is a minimum provision.

The council notes the NFU's recommendations. However, under current legislation this is not a requirement when considering the provision of sites for Gypsies, Travellers and Travelling Showpeople.

The council notes the comments made by CPRE – Fylde District are noted. The council will have to meet the needs of Gypsies and Travellers (under the new definition) and in accordance with the Housing and Planning Bill, in performing its statutory function as the Local Planning Authority.

Criterion f) in policy **H5** is intended to promote smaller sites for Gypsies and Travellers, with smaller numbers of families on them. It is not applied to sites for Travelling Showpeople because they usually need a larger site in order to store and maintain their equipment. However, if a Travelling Showperson wanted to live on a small site and wished to apply for planning permission, the council would consider that site on its merits.

Recommendations for change

- Policy **H5** will be updated in line with the updated GTAA and the Housing and Planning Bill
- Delete (~~Criterion f does not apply to Travelling Showpeople Sites~~)

Additional recommendations for change

The Government has withdrawn the Designing Gypsy and Traveller Sites Good Practice Guide DCLG 2008 and so reference to this guidance will need to be deleted from the plan. It will be necessary to establish a series of local design criteria to ensure that Gypsy and Traveller Sites are designed in an appropriate manner.

Additional recommendations for change

- At Paragraph f), delete ~~The detailed design of the site for Gypsies and Travellers should be in accordance with The Designing Gypsy and Traveller Sites Good Practice Guide DCLG 2008.~~
- That a series of design criteria are drafted for inclusion in the local plan.

Policy H6 Isolated New Homes in the Countryside

Number of representations:

Comment	Support	Object	Total
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2	0	0	2
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Representations received from:

- Council for the Protection of Rural England (CPRE) - Fylde District
- 1 Landowner

What you said

The CPRE – Fylde District commented that criteria b) of H7 and the justification at paragraph 10.85 should also apply to isolated new homes in the countryside.

A landowner commented that other circumstances are identified in the framework whereby isolated new homes in the countryside will be permitted. These include; Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; where the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting; These allowances should be included within the policy to ensure its compliance with the Framework.

Council response

With regard to the CPRE – Fylde District comment, criterion a) to d) of policy H6 which are taken directly from the Framework are considered to provide stronger protection for character of the surrounding rural area with regard to scale, design and use of materials than criterion b) of H7, which would effectively weaken the policy and mean that it did not comply with paragraph 55 of the Framework.

The council agrees with the landowner that the text should be added to policy H6 text to bring it into line with the Framework regarding heritage assets.

Recommendations for change

Add the following text to policy H6: ‘Where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; where the development would re-use redundant or disused buildings and lead to enhancement in the immediate setting.’

Additional recommendations for change

Two of the following additional changes are proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan; and a further change is proposed to clarify and update the existing text on new homes in the Countryside in Chapter 10 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add an extra criterion to section 2 in policy **H6**: ‘e) protect the local environment.’
- Amend paragraph **10.81** to read: ‘For social, economic or environmental reasons it is often preferable for rural workers to live close to their place of work. However, because of continuing high demand for rural homes by the general community, the council considers it is necessary that applications for isolated homes in the countryside for rural workers’ occupation fulfil the criteria set out in policy **H6**. Ballam, Greenhalgh, Larbreck, Little Eccleston, Mythop, Roseacre, Thistleton, Treales and Wharles are located within the countryside. Given their respective sizes, lack of services and facilities, they will not be seen as a focus for new development. Proposals for infill development for new homes may be acceptable provided they comply with other policies in this Local Plan. Fylde Council will continue to work with Lancashire County Council to address traffic issues in these countryside areas.’

Policy H7 Replacements of, and Extensions to, Existing Homes in the Countryside**Number of representations:**

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- 1 Landowner

What you said

A landowner objected claiming that the Local Plan should not be setting a specific figure to restrict the size of a replacement home or domestic extension. Every proposal should be considered on its own merits. Such figures should be contained within a guidance document rather than a Local Plan policy.

Council response

The council disagrees with the landowner’s comment. The Local Plan contains policies for the management of development. There is an issue with small rural homes being replaced by much larger properties. This is making it more difficult to buy a small rural property and it is also having a negative impact on the rural landscape.

Recommendations for change

- None

Chapter 11: Health and Wellbeing**Chapter 11: General Comments**

Number of representations:			
Comment	Support	Object	Total
1	0	1	2

Representations received from:

- Blackpool Council – Planning
- 1 Action Group

What you said

Blackpool Council commented that reference should be made to the proposed neighbourhood planning approach to Marton Moss which lies on the Blackpool/Fylde boundary. There is potential for a joint evidence base strategy relating to biodiversity in this area, which could be explored through the Duty to Co-operate process.

The Action Group commented that they regularly point out traffic issues in relation to new residential development in Wrea Green, which have been ignored, yet Fylde has a higher than average toll of road deaths.

Council response

In response to Blackpool Council's comments, it was agreed at the Fylde Coast Authorities and Lancashire County Council Duty to Co-operate meeting in July 2015 that a joint Fylde Coast Biodiversity and Nature Conservation Supplementary Planning Document (SPD) would be prepared. The scoping of the SPD will take place prior to the issuing of the Publication version of the Local Plan in summer 2016, as requested by Natural England. Therefore, the council considers that the Marton Moss site will be addressed in this.

In regards to the Action Group's comments, the council consult regularly with the Highways Authority (LCC) and Highways England in relation to highway issues on planning applications. Any objections raised by these statutory bodies are accounted for in the determination of the application.

Recommendations for change

- None

Policy HW1: Health and Wellbeing

Number of representations:

Comment	Support	Object	Total
0	0	2	2

Representations received from:

- 1 Action Group

What you said

An Action Group objected claiming that the cycle routes are on narrow fast moving C roads and are not marked out, leading to unsafe cycle routes. Wrea Green has no NHS facilities, development still gets approved, and this matter is raised in the draft Neighbourhood Plan.

Council response

The council notes the Action Group's comments. This point is covered in the council's Infrastructure Delivery Plan (IDP), which accompanied the RPO version of the Local Plan. Cycle provision is set out in detail in section 2 of the IDP and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council considers that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

- Add the following text to criterion c) in policy **HW1**: 'and with providers of other social and community infrastructure to deliver appropriate facilities in accessible locations, to meet local needs.'

- Amend criterion f) in policy **HW1** to read: ‘Promoting improvements to healthy lifestyles and developing a network of cycling and pedestrian routes ~~within the Borough~~ - linking key settlements and service centres, enabling the community to improve their health by travelling by more sustainable modes of transport - integrated into a wider multi-functional green infrastructure network;’
- Add a new criterion to policy **HW1**: ‘The reduction of health inequalities and initiatives to facilitate healthier lifestyles will be supported, where these can be delivered through the planning system.’

Policy HW2: Community Facilities

Number of representations:

Comment	Support	Object	Total
4	0	3	7

Representations received from:

- Highways England
- Lancashire County Council – Planning
- Lytham St Annes Cycle Group
- 1 Action Group

What you said

*Highways England commented that as the policy is new, the response made to policy **INF1** remains applicable and in line with this policy.*

*Lancashire County Council (LCC) commented that due to LCC financial constraints there will be significant changes in the future to delivering services within neighbourhood centres. It is critical to ensure that the appropriate services are available to those that need them most. It is within this context that the wording of Policy **HW2** should be made more flexible to allow these necessary changes.*

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

Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham; this site should remain within the Local Plan.

Lytham St Annes Cycle Group commented that the secondary care services as mentioned in paragraph 11.13 are provided by Blackpool Teaching Hospitals NHS Foundation Trust and not Lancashire as written.

The Action Group commented that the local ONE stop shop in Wrea Green sells convenient foods, and 6 others are proposed across the borough. They also state that single story homes are needed in Wrea Green but only profitable two storey homes are being built. In addition, Wrea Green suffers with a shortfall in school places but this is regularly ignored when approving planning applications.

Council response

The council notes Highways England’s comments which are addressed further under policy **INF1** in Chapter 12.

The council agrees with LCC’s comment to amend the third paragraph of policy **HW2** to include the words ‘... no longer viable...’

In relation to LCC’s comments on the potential need for additional primary school sites and a new secondary school, this element is covered under policy **M1** in Chapter 7 and in the **IDP**. The council understands that there is a potential requirement for additional primary school sites and an additional secondary school site, all of which depend upon the position and feasibility of expansion of existing schools at the time of delivery of these developments. The council agrees to continue close working with LCC on the provision of new school places and school sites through the Education Liaison Group meetings.

The council has confirmed the Lytham St Annes Cycle Group comment and will make the necessary changes within the RPO to reflect that it is the *Blackpool Teaching Hospitals NHS Foundation Trust* and not Lancashire Teaching Hospitals NHS Foundation Trust as stated.

In regards to the comments made by the Action Group, this policy and justification has been developed to protect allotments and community food growing schemes rather than retail convenience stores. In regards to school places, as paragraph **11.24** clearly states education provision is set out in the council’s IDP. Furthermore, planning applications are considered on their own merits, case by case and LCC as the education provider are consulted on all major residential planning applications.

Recommendations for change

- Add an additional paragraph to policy **HW2** to read: ‘A site for a new primary school will be reserved at Mowbreck Lane, in Wesham – as identified on the Policies Map - for the relocation of the CE Primary School on Garstang Road North, in Wesham.’

- Amend the third paragraph of policy **HW2** to read: ‘The loss of any community facilities will be resisted unless it can be demonstrated that the facility’s continued operation is no longer viable or needed, or can be relocated elsewhere in a location that is equally accessible by the community.’
- Change paragraph **11.13** to read ‘**Blackpool**’ Teaching Hospitals NHS Foundation Trust, instead of ~~Lancashire~~ Teaching Hospitals NHS Foundation Trust.
- Amend paragraph **11.24** to read: ‘It is projected that there will be a significant shortfall of school places in the Borough over the plan period and many schools, particularly within Lytham and St Annes, are already at capacity. The County Council, as the Education Authority currently holds a site off Mowbreck Lane, Wesham for the possible relocation of the Church of England primary school on Garstang Road North, Wesham. The site is identified on the Policies Map and is safeguarded for school purposes. Education services in Fylde are managed by LCC, which has identified a need for a new secondary school in the Borough. considers that there is a need for Fylde Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of the Local Plan. Further information on education provision is set out in the draft Infrastructure Delivery Plan (IDP), which ~~that~~ accompanies this ~~document~~ local plan.’

Additional recommendations for change

The following additional change is proposed to clarify and update the existing text in Chapter 11 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Add an additional paragraph to policy **HW2** to read: ‘A site for a new Church will be reserved on land at the rear of cottages on Lytham Road, in Warton – as identified on the Policies Map – for the re-location of Holy Family Church in Warton.’

Policy HW3: Provision of Indoor and Outdoor Sports Facilities

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Number of representations:			
Comment	Support	Object	Total
1	0	0	1

Representations received from:

- Sport England

What you said

Sport England welcomed the fact that all previous suggested changes had been made, however they were unable to determine whether any proposed allocations are located on any existing playing fields. Sport England would object to any allocation that affects an existing or lapsed playing field unless the emerging Playing Pitch Strategy clearly demonstrates that the site is surplus to requirements. Or the policy specifies a replacement within the locality should be found that is an equivalent or better quantity and quality.

Council response

The council is aware of only one site, situated at Kirkham Grammar School, which is not a shared facility and before any development proposals come forward it would have to adhere and meet with the criteria as set out in policy **HW3**.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in Chapter 11 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **11.28** to read: ‘Many community facilities are also sports facilities. Consequently, the delivery of such facilities ~~should be~~ is based upon the findings of the Built Facilities Review, prepared by Lancashire Sport Partnership in August 2015. The Facilities Review recommends the provision of indoor tennis centres in Fylde, together with approximately 113 more Health and Fitness stations, due to current under-provision.

Policy ENV5 in chapter 14 covers outdoor open space; open space standards and contributions.’

- Amend the title of policy **HW3** to read: ‘Protection and Provision of Indoor and Outdoor Sports Facilities’
- Amend criterion 1.b) of policy **HW3** to read: ‘Improved alternative provision will be created in a location well related to the functional requirements of the relocated use and its existing and future users. This would be over and above any provision made available through CIL;’

Policy HW4: Contaminated Land

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations received were received in regards to policy **HW4**.

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

- Add the following sentence to the end of criterion a) in policy **HW4**: ‘Any remedial work should be undertaken to the satisfaction of the local authority, ahead of the commencement of development (apart from that associated with the agreed remedial works);’
- Amend paragraph c) in policy **HW4** to read: ‘Applicants will be required to provide details of ~~should address the physical capability of the land~~ remedial and mitigation measures to protect the high levels of biodiversity value on contaminated land, the ~~adverse effects of instability on the development, or of adjoining development on unstable land, and to protect the effects on (amongst other things) local amenities and~~

conservation and heritage assets on the site interests of the development and any remedial measures.’

CROSS CUTTING THEMES IN CHAPTER 11:

Number of representations:

Comment	Support	Object	Total
0	0	1	1

Representations received from:

- 1 Action Group

What you said

An Action Group questioned why concerns regarding public transport had not been heeded when planning applications have come forward for determination.

Council response

The council notes the Action Group’s comments. The council considers that these issues are fully considered as part of the determination process.

Recommendations for change

- None

Chapter 12: Infrastructure, Service Provision and Transport**Chapter 12: General Comments**

Number of representations:			
Comment	Support	Object	Total
2	0	1	3

Representations received from:

- Newton with Clifton Parish Council
- An Action Group
- 1 Resident

What you said

Newton with Clifton Parish Council are concerned that the borough's housing proposals will place an unacceptable pressure on existing infrastructure in respect of:

- Transport: i.e. highways, rail, bus, cycling &c.*
- Water: supply, wastewater and surface water drainage, flood defences and flood risk management.*
- Waste management: disposal and recycling.*
- Information and communications technology: telecommunications, broadband and cable television.*
- Education: nursery and pre-school, primary, secondary, further, higher, and adult education.*
- Energy: electricity generation and provision.*
- Health: hospitals, health centres / general practitioner surgeries and hospices.*
- Emergency services: ambulance, fire and rescue, police &c.*
- Green infrastructure: open space, parks, children's play areas, sports pitches and courts, country parks and accessible natural green space, allotments and burial facilities.*
- Community services: libraries, community centres, youth services, social services, older peoples support, special needs and disability &c.*
- Culture and leisure: museums and galleries, performance venues, sports and fitness centres.*
- Affordable Housing.*

An Action Group commented that the cross cutting theme on viability should be worked up.

A local resident commented on the benefits associated with cycling in terms of Promoting Health and Wellbeing and Achieving Good Design.

Council response

The council notes the comments on viability.

The Infrastructure Delivery Plan and associated Infrastructure Delivery Schedule itemises infrastructure projects already envisaged or probably needed after taking account of the quantum and broad location of all of the growth proposed in the Local Plan and to record the likely implementation timescale, costs and sources of funding and the current deficits - funding gap shortfalls (deficits) after taking account of monies already secured.

The council notes the resident's additional comments which are incorporated in the Infrastructure Delivery Plan and elsewhere throughout the Local Plan.

Recommendations for change

- None.

Policy INF1: Service Accessibility and Infrastructure

Number of representations:			
Comment	Support	Object	Total
2	0	2	4

Representations received from:

- Highways England
- Blackpool, Fylde and Wyre Trades Union Council
- 1 Action Group
- 1 developer

What you said

Highways England noted that this policy has been amended slightly and the overall policy provision remains the same. Their previous comments remain pertinent and the policy is supported.

Blackpool, Fylde and Wyre Trades Union Council welcomed new development in the Fylde, including new homes and jobs, however the services to go with the housing and communities are essential, including transport and roads as well as communications (including internet), shops, health services, leisure, community centres etc. Great care is needed to get this part of the plan right.

An Action Group raised matters of detail relating to a planning application that has been approved.

A developer commented on criterion b) of this policy which references mitigation of any negative impacts. They do not believe that this wording is compliant with the Framework as it is not positively prepared. Firstly the impact of viability on delivery of development should be considered. Secondly, if in such instances as the LPA are unable to show a 5 year housing land supply, national policy guides us to "grant permission unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." and in case of impacts on the Local Highway Network: "Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." That is to say not all negative impacts can be fully mitigated for, but this is not on its own a sufficient reason for refusal. It must be considered in context.

Council response

The council notes Highways England's support.

The council notes Blackpool, Fylde and Wyre Trades Union Council's comments. The comment relating to previous planning consents is also noted.

The council agrees with the developer to amend criterion b) of policy **INF1**, so that it is positively prepared.

Recommendations for change

- Amend criterion b) of policy **INF** to read: 'b) ~~Mitigate~~ Minimise any negative impacts...'

Additional recommendations for change

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

Additional textual changes

- Add the following two new criteria to policy **INF1**: 'Mitigate any environmental impacts of new infrastructure provision;' and 'Use sustainable natural resources where appropriate;'

Policy INF2: Developer Contributions

Number of representations:			
Comment	Support	Object	Total
3	2	3	8

Representations received from:

- Lytham St Annes Civic Society
- Bryning with Warton Parish Council
- Canal and River Trust (formerly British Waterways)
- 2 Developers
- 1 Action Group
- 2 residents

What you said

Lytham St Annes Civic Society stated that the M55 to Heyhouses Link Road is badly needed.

*A resident commented that policy **INF2** should clarify that developers cannot renegotiate their contributions on viability grounds unless there are genuine external changes to economic conditions.*

Bryning with Warton Parish Council supported this section of the Plan, but do seek clarification in respect of criterion f) as to what 'land and buildings' are, or could be available toward such infrastructure developments. The Parish Council has been advised by LEP and BAE that no land is being made available.

The Canal and River Trust (formerly British Waterways) welcomed the potential for developer contributions towards enhancing the functionality, quality, connectivity and accessibility of the Green Infrastructure network of which the Lancaster Canal is a part. Where appropriate the Trust would wish to seek developer contributions towards the mitigation of any impacts caused by development adjacent to the canal such as towpath improvements etc.

An Action Group questioned why the cost of independent verification is to be borne 'where necessary' and is not standard.

*Another resident commented that in relation to criterion d) of policy **INF2** that CIL monies should be pooled towards cycleway creation.*

A developer stated that whilst the council may find it viable to introduce a CIL charging schedule later in the plan period, this will not be immediate, creating a period of uncertainty. It is important, therefore, that the council identifies the likely development costs and funding mechanisms for infrastructure throughout the plan period, and how this may impact on meeting the council's development needs, particularly for housing, in advance of the adoption of the Local Plan.

*A developer welcomed the use of the words 'subject to viability' and 'normally' in **INF2**. They also went onto state that this policy should clearly state that obligations will be sought for specific projects. This will ensure that the obligations are necessary, directly related, and fairly and reasonably related in scale and kind to the development.*

Council response

The council notes the support of the Lytham St Annes Civic Society for the M55 to Heyhouses (St Annes) Link Road.

The council considers that the last paragraph of policy **INF2** addresses the point regarding viability and any potential flexibility in the planning obligation.

In response to Bryning with Warton Parish Council and the proposed local service centre at Warton, paragraph **6.19** states that the proposed local service centre is to be on BAE Systems land. As referred to under policies **SL3** in Chapter 7 and **EC4** in Chapter 9, the council will illustrate the location of the proposed local centre in Warton on the **Policies Map** which will accompany the Publication version of the Local Plan.

The council agrees with the resident to amend paragraph **12.20** in light of the recent changes to the CIL regulations on pooled contributions (Regulation 123), which came into force in April 2015.

The council notes the Canal and River Trust's (formerly British Waterways) and the house builder's support.

The council agrees to amend paragraph **12.23** so as to remove 'where necessary,' in respect of the cost of independent verification of financial appraisals.

In response to the developer's comments it will be the role of the council's Section 123 List, developed as part of the Community Infrastructure Levy, to determine which projects and infrastructure receive monies.

Recommendations for change

- Add a new second sentence in paragraph **12.20** to read: 'In light of the CIL Regulations on pooled contributions (Regulation 123) which came into force in April 2015, Council's cannot collect more than 5 pooled contributions (from developments since April 2010) towards a single project or type of infrastructure not covered by a CIL infrastructure list/ charging schedule.'
- Amend the last sentence of paragraph **12.23** to '... appraisal. ~~where necessary.~~'

Policy T1: Strategic Highway Improvements
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Number of representations:			
Comment	Support	Object	Total
4	1	7	12 ³⁷

Representations received from:

- Highways England
- Blackpool Council
- Greenhalgh with Thistleton Parish Council
- Medlar with Wesham Town Council
- Lytham St Annes Civic Society
- 1 Landowner Group
- 1 Action Group
- 2 residents

What you said

Highways England stated that a suitable evidence base is needed in order to consider the implications of new development on the safe and efficient operation of the Strategic Road Network; and that appropriate measures should be identified to support the proposed level of development. Highways England, in September, provided an initial level of evidence in the 'Fylde Local Plan to 2032 (Emerging) – Highways England Assessment Report'. However, it is not clear whether the Council has developed this evidence further, beyond that initial assessment, that would enable Highways England to make further comments on the appropriateness of these improvements and whether they be sufficient, or whether other measures will be required in order to support the development and growth aspirations proposed in the Plan. The Assessment Report 'intentionally falls short of interpreting the results in detail as it is considered they should form the basis of further discussion prior to moving to the stage of identifying/confirming any policy outcomes and solutions'. It is considered that there is still a need to confirm the transport infrastructure requirements needed to support the Plan.

Blackpool Council commented that references to the Blue Route need to be updated to reflect the published Fylde Coast Highways and Transport Masterplan (July 2015) and the commitments within. Discussions need to be had with Wyre Council, Highways England and Lancashire County Council regarding the A585 Windy Harbour to Sippool scheme.

Greenhalgh with Thistleton Parish Council wished to see recognition of the acute problems of the A585 particularly between Windy Harbour and Junction 3 of the M55 and the A585 non-trunk link through the Kirkham Westerly by-pass from the A584 to junction 3.

Medlar with Wesham Town Council were concerned about the amount of traffic being routed onto the Kirkham and Wesham bypass, in particular along the A585 to and from the M55 (J3). The traffic lights have not been operational for 18 months and when they were they did not help the problem. No other remedies have been proposed. This problem will be further compounded when the Mill Farm complex and housing developments are completed.

An Action Group commented that many trains are already over-crowded and expensive to use. They also commented that the A584 is congested at peak times and that Blackpool Airport does little to contribute to connectivity. Furthermore they raised matters of detail relating to a planning application that has been approved.

Lytham St Annes Civic Society stated that the M55 to Heyhouses Link Road is badly needed.

A landowner group also supported the delivery of the M55 to Heyhouses (St Annes) Link Road. They agree with the policy which confirms that the Fylde-Blackpool Periphery Strategic Location for Development has good access to Junction 4 of the M55 and to the A583, while links to St Annes and Lytham will be improved by the construction of the M55 to Heyhouses (St Annes) Link Road. The Link Road will provide a direct north / south route across the moss linking the M55 Motorway and Lytham St Annes.

One resident commented that much of the highways infrastructure is inadequate to support the proposed developments in Kirkham and Wesham, Wrea Green and Warton. They are not convinced that the Preston Western Distributor Road will relieve much of the pressure on the rest of the network in rural Fylde. They state that there are no suggestions for the improvements to the A585 through Greenhalgh, Esprick and Thistleton, or the A585 between Junction 3 and A584.

Another resident also commented that they are surprised and disappointed that a bypass around Warton has not been provided.

Council response

It is considered that the RPO version of the Local Plan reflected the Fylde Coast Highways and Transport Masterplan, which was approved and adopted by LCC in July 2015. The council is required to continue to safeguard that part of the M55, junction 3 to Norcross, which lies within Fylde, until such time as it is advised to do otherwise. The Local Plan will refer to the most up-to-date position as is publicly available in regard to the Windy Harbour to Skippool major roads investment scheme.

The traffic congestion issues experienced along the A585(T) are acknowledged in the adopted Fylde Coast Highways and Transport Masterplan, 2015, which forms part of the Local Plan's evidence base. The congestion issues will, amongst other things, also be the subject of the North Fylde Connectivity Study which is due to be completed in 2016/17.

Further traffic modelling is to be undertaken which will form part of the Local Plan's transport evidence base. It is intended primarily to satisfy Highway England's concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the

council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

The Local Plan has been formulated in conjunction with LCC, as Highways Authority. The Highways Authority has not suggested that a bypass around Warton is necessary through the plan making process, nor the various planning applications in the Warton area which they have been consulted on or involved in.

The council notes the comment relating to Blackpool Airport and attention is drawn to the word ‘relatively’. The comment relating to previous planning consents is noted.

The council notes the support of the landowner group and Lytham St Annes Civic Society for the M55 to Heyhouses (St Annes) Link Road.

Recommendations for change

- At the time of publication - Reflect the most up to date position as is publicly available in regard to the Windy Harbour to Skippool major roads investment scheme.
- Further traffic modelling is to be undertaken which will form part of the Local Plan’s transport evidence base. It is intended primarily to satisfy Highway England’s concerns and demonstrate how impacts upon the Strategic Road Network are addressed, in order that the council can identify and confirm any policy outcomes and solutions. This work will include specific modelling of the M55 motorway junctions, so will therefore also consider the issues raised by Medlar with Wesham Town Council.

Additional recommendations for change

The following additional change was proposed by County Highways (Transport Policy) to update the text in policy **T1** in Chapter 12 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend criterion b) of policy **T1** to read: ‘The M55 to ~~Norcross Link Road~~ Fleetwood Corridor improvements (i.e. ~~the Blue Route~~); and’
- Amend the first two sentences of paragraph **12.36** to read: ‘The Fylde Coast Highways and Transport Masterplan, July 2015 and the North Fylde Connectivity Study include reference to the M55 to Fleetwood Corridor improvements (~~formerly known as the Norcross Link Road~~ (i.e. ~~the Blue Route~~), the route of which traverses land in both Fylde and Wyre. Fylde Council and LCC consider that the Blue Route

should be safeguarded until an alternative highway solution is proposed to alleviate congestion on the A585.'

Policy T2: Blackpool Airport

Number of representations:

Comment	Support	Object	Total
3	1	0	4

Representations received from:

- Highways England
- Lancashire County Council
- Blackpool Council
- Treales Roseacre and Wharles Parish Council

What you said

Highways England noted that this policy has been significantly amended. The policy and these amendments continue to be supported.

Lancashire County Council commented that this policy must align with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.

Blackpool Council commented that references to Blackpool Airport throughout the Plan need to be updated to reflect the current situation and plans for the future.

*Treales Roseacre and Wharles Parish Council stated that policy **T2** and paragraph **12.40** should highlight the relationship Blackpool Airport, with the job targets associated with its new status as a LEZ and the required development to achieve this. This is to ensure there are no inconsistencies in pursuing the different activities proposed at and around Blackpool Airport and the LEZ.*

Council response

The council notes Highways England's support.

The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone. It will support the sustainable development of Blackpool Airport; create more businesses, jobs and attract international investment, with positive benefits across the wider economic area.

The council does not consider it appropriate to amend either policy **T2** or paragraph **12.40** as suggested by Treales Roseacre and Wharles Parish Council. Firstly, the Local Plan is to be read as a whole and each of these matters are to be addressed elsewhere in the Local Plan or the IDP. (The council will include a policy in Chapter 9 relating to the Blackpool Airport Enterprise Zone. It will support the sustainable development of Blackpool Airport; create more businesses, jobs and attract international investment, with positive benefits across the wider economic area). Secondly, the necessary infrastructure will deliver the Local Plan as a whole, not just the EZs.

All references to Blackpool Airport throughout the Plan will reflect appropriate plans for the sustainable development of Blackpool Airport, including work to explore the potential to develop commercial aeronautical activity.

Recommendations for change

- The Publication version of the Local Plan will be drafted to include a new policy in Chapter 9, regarding Blackpool Airport Enterprise Zone.

Additional recommendations for change

The following additional changes are proposed to clarify and update the existing text in policy **T2** which will appear in the Publication version of the Local Plan. It is not considered practical to illustrate the Airport Safeguarding Zone on the **Policies Map** as the notified area may be subject to further change during the plan period.

Additional textual changes

- Amend the last sentence of policy **T2** to read: ‘Blackpool Airport, including Centrica’s heliport will be consulted on all developments within the Airport Safeguarding Zones ~~which are shown on Figure 6~~ will be shown on the Policies Map.’
- Amend paragraph **12.46** to read: ‘All planning applications within the Airport Safeguarding Zone, ~~which will be shown on the Policies Map, accompanying the next version of the Local Plan~~ as shown on Figure 6 (or as subsequently amended), will be the subject of consultation with the operator of the airport. The Airport Safeguarding Zone around Blackpool Airport, incorporates Centrica’s heliport. Elsewhere in the Borough, buildings over a notified height will also be the subject of consultation. There may also be restrictions on the height or detailed design of buildings or on development which might create a bird hazard.’

Policy T3: Enhancing Sustainable Transport Choice

Number of representations:			
Comment	Support	Object	Total
8	2	4	14 ³⁸

Representations received from:

- Highways England
- Blackpool Council
- Lancashire County Council
- Lytham St Annes Civic Society
- The Trams to Lytham Team
- 1 Action Group
- 1 Resident

What you said

Highways England noted that policy T3 had been significantly amended and now includes reference to working with Highways England to deliver improvements to transport and infrastructure. The policy and these amendments continue to be supported.

Blackpool Council suggested that reference could be made in the Plan to the Rights of Way Improvement Plan.

Lancashire County Council stated that the extension of the Blackpool Tramway from the Promenade to Blackpool North station is now a committed scheme in the Lancashire Growth Deal.

Lytham Civic Society supported the proposed integration of different modes of transport, is being investigated.

An Action Group supported criterion j), and the inclusion of the park and ride at Kirkham and Wesham Railway Station, but noted that it includes no timescales. Comment was also made about the ability to enhance sustainable transport options and implementing planning conditions. They also stated that some existing cycle routes are unsafe.

The Trams Team to Lytham commented that a light rail system on the line between Squires Gate and Lytham by linking to Blackpool's tramway will solve many of the issues facing transport in Lytham and St Annes, and on the whole of the Fylde Coast. They urged the council to embrace a pro-transport agenda with a focus on light rail, and unlock the economic growth and improved user experience that it will bring.

A resident commented that the Local Plan shows support in principle for cycling but lacks detail, definition or a programme of how things will be achieved and when. Proper, safe cycle

ways, are currently being discussed with local schools and companies. They state that in relation to paragraph **12.50** that a definition of 'safe' needs to be included. They also state that **12.57** is incorrect in terms of the Fylde. There is almost no cycling off road, and even less that cyclists use or would use.

Council response

The council notes Highways England's and Lytham Civic Society's support.

In respect of the Action Group's comments on criterion j) and the resident's on cycleways, the Infrastructure Delivery Plan and associated Infrastructure Delivery Schedule is the document where timeframes for project deliveries are set out. The additional comments made by the resident are noted.

The council will amend paragraph **12.52** in respect of the Blackpool Tramway.

In respect of the resident's and Blackpool Council's comment the council will include reference in the Plan to the Rights of Way Improvement Plan in paragraph **12.56** in Chapter 12 and paragraph **14.41** in Chapter 14.

The council note Trams Team to Lytham's comment.

Recommendations for change

- Amend the third, fourth and fifth sentences of paragraph **12.52** to read: 'The Fylde Coast is one of five regions where the project is evaluating available options, such as connecting the existing tramway to the railway at Blackpool North, as well as the South Fylde line. A light rail link to Blackpool North Station is the preferred scheme. The extension of the Blackpool Tramway from the Promenade to Blackpool North station is now a committed scheme in the Lancashire Growth Deal, subject to the business case demonstrating the scheme is value for money and the scheme promoter securing the necessary statutory powers to construct it. The project could cost £18 million, ~~and it will include Major Scheme Funding.~~'
- Amend criterion g) in policy **T3** by adding: 'tourism developments' after 'employment areas' and '... support, promote and implement innovative public transport initiatives;'
- Amend criterion h) in policy **T3** by adding the following text at the end of the sentence: 'on the South Fylde Line'
- Amend paragraph **12.56** to ..."cyclists and pedestrians. Many of these are identified in the Lancashire Rights of Way Improvement Plan. Further..."

Policy T4: Parking Standards

Number of representations:

Comment	Support	Object	Total
0	1	0	1

Representations received from:

- Highways England

What you said

Highways England noted that the policy has been amended with the addition of the first sentence and ensuring that car parking is provided wherever possible to ensure no detrimental effect on highway safety. This principle and amendment can be supported.

Council response

The council notes Highways England's support.

Recommendations for change

- None.

Chapter 13: Water Resource Management, Flood Risk and Addressing Climate Change**Chapter 13: General Comments****Number of representations:**

Comment	Support	Object	Total
3	0	1	4

Representations received from:

- Marine Management
- 1 Action Group

What you said

The Marine Management Organisation submitted details of various statements and checklists the council may find useful, but made no specific comment to the RPO.

The Action Group suggested that no account has been taken of the rising water table on east Fylde.

Council response

Marine Management comments are noted.

The council disagrees with the comments made by the Action Group. The council are very aware of the issues in the east of Fylde and have repeatedly passed these concerns on to the Lead Local Flood Authority at LCC and the Environment Agency, as well as holding regular meetings of the Making Space for Water group and the Fylde Peninsula Water Management Partnership, where issues and concerns are raised and actioned by the relevant body.

Recommendations for change

- None

Policy CL1: Flood Alleviation, Water Quality and Water Efficiency
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Number of representations:			
Comment	Support	Object	Total
5	1	1	7

Representations received from:

- Lancashire County Council – Planning (LCC)
- Fylde Borough Council – Building Control Manager
- Lytham St Annes Civic Society
- National Farmers Union (NFU)
- 1 Action Group

What you said

LCC suggested changing the phrase ‘dealing with it’ in paragraph 13.15 to ‘managing’ as dealing with it implies that it will resolve all flooding issues of this type. LCC also consider it would be beneficial to include a section on the roles and responsibilities of riparian owners, as they often have responsibility for undertaking action. It should also be made clear that LCC does not have the power to undertake works on Ordinary Watercourses. Additionally, it would be useful to refer to LCC’s role in providing Land Drainage Consents, and that LCC are a statutory consultee in the planning process. In regards to paragraph 13.26 LCC will generally refuse land drainage consent applications which seek to culvert sections of ordinary watercourse, it may be useful to reference their policy on this.

In addition, LCC commented that policy CL1 and paragraph 13.35 should make reference to the SuDs hierarchy, which is a very useful way of illustrating how surface water on new developments should be managed. The reference to water course consent at point e) appears to be unnecessary, water course consent and ecology should be considered separately by the policy.

FBC, building control commented in regards to paragraph 13.31 – Flood Defences, and recommend the addition of text, so the paragraph reads.Policy CL1 therefore requires developer contributions through the CIL for the repair, maintenance, renewal or replacement of the coastal flood defences. Similarly for continuation purposes, paragraph 13.33 should read Developers contributions required under policy CL1 for the repair, maintenance renewal or replacement of the flood defences.

Lytham St Annes Civic Society supported the incorporation of green spaces within developments to manage surface water drainage.

The NFU commented that it is essential that any new development does not have a negative impact on the existing system, and that plans are in place for the long term maintenance of any new drainage systems.

The Action Group stated that sewage overflow now counts as flooding and needs to be considered.

Council response

The council notes LCC's comments. The SuDs hierarchy is already set out at policy **CL2** and in paragraph **13.37**. Consequently, there is no need to add text to policy **CL1** referencing the SuDs hierarchy or provide a further reference in paragraph **13.35**.

The council acknowledges comments made on behalf of FBC's Building Control Team and will amend the text in paragraphs **13.31** and **13.33** accordingly.

The council notes Lytham St Annes Civic Society's comments.

The NFU's comments are noted and the council will continue to work with its colleagues at LCC, Environment Agency and United Utilities to ensure adequate drainage systems are in place and maintained.

The council notes the Action Group's comments, however this issue is covered under the Joint Lancashire Minerals and Waste Local Plan.

Recommendations for change

- Amend the text in the second bullet point in paragraph **13.15** to read: 'Lancashire County Council (Lead Local Flood Authority and Highways Authority) – is responsible for ~~dealing with~~ managing surface water flooding ...'
- Add the following text in the second bullet point in paragraph **13.15** 'LCC also provide Land Drainage Consents and are a statutory consultee in the planning process.'
- In the third bullet point in paragraph **13.15** add the following text: 'Under Section 14A of the Land Drainage Act the council has the powers to undertake works to manage flood risk from ordinary watercourses.' In addition update the wording in **Table 6** to address this.
- Add additional text setting out the roles and responsibilities of riparian owners.
- Add the following text at the end of paragraph **13.24**: 'Farms can have an important role to play in flood risk management, e.g. the use of farmland for wetland or flood storage.'

- Add the following text in paragraph **13.26** to read ‘...to a watercourse. LCC will generally refuse Land Drainage Consent applications which seek to culvert sections of ordinary watercourse. Buffer strips ...’
- At the end of paragraph **13.26** add the following text: ‘Further information can be found in LCC’s ‘Ordinary Watercourse Consenting and Enforcement Policy on LCC’s website.’’
- Amend the text in paragraph **13.31** to read ‘... developer contributions through the CIL for the repair, maintenance, renewal or replacement of the coastal flood defences’.
- Amend the text in paragraph **13.33** to read: ‘... under policy **CL1** for the repair, maintenance, renewal or replacement of flood defences...’
- Re-word part e) of policy **CL1** as water course consent and ecology should be considered separately by the policy.
- Add a new criterion (k) in policy **CL1**: ‘Ensuring that farmland is used for wetland or flood storage.’

Policy CL2: Surface Water Run-Off and Sustainable Drainage

Number of representations:

Comment	Support	Object	Total
7	0	3	10

Representations received from:

- Lancashire County Council – Planning (LCC)
- Environment Agency (EA)
- United Utilities
- Bryning with Warton Parish Council
- 1 Developer
- 1 Action Group

What you said

LCC commented that policy **CL2** should quote the discharge hierarchy as set out in PPG paragraph **80** (Flood Risk and Coastal Change), which is more relevant to a planning document, rather than as set out in building regulations, which is currently used. Reference to the 'Non-statutory Technical Standards for SuDs' produced by Defra would be useful. LCC's SuDS: Local Specifications, Standards and Policies' will be adopted in 2016. Paragraph **13.37** refers to emerging hierarchy, this should be changed as it is now referenced in both Planning Practice Guidance and Building Regulations. LCC will require evidence to demonstrate that infiltration is not possible before other surface water discharge options will be approved.

LCC also recommended that it may be useful to reference in paragraph **13.43** the 'Climate Change Allowances for Planners' document produced by the EA.

The EA advised that it should be referenced within the document that surface water management now falls under the remit of LCC and their implementation should be in accordance with the principles of the emerging SuD's: Local Specifications, Standards and Policies' document. In addition they recommend that the implementation of SuDs is extended to significant refurbishments and/or redevelopment, and not just limited to new development.

Furthermore, in regards to paragraph **13.36**, the EA commented that although there are strong references to Bathing Waters etc. they have concerns about the lack of reference to shellfish waters, which should be concern for the council as there is a failing shellfish water (Ribble Estuary).

United Utilities recommended that the council amends the texts in parts **(1), (2) and (3)** to read 'Controlled discharge of rainwater...' to ensure developers are aware that this will not allow free flows. They also state that discharge rates should be agreed as part of any pre-application negotiations between the relevant parties.

Bryning with Warton Parish Council commented that concerns raised regarding sewerage and surface water drainage have been made on all major development sites, and failure to address these concerns will have significant long term implications, and that it is strange that these concerns of Warton and neighbouring parishes are not voiced in the justification summary.

One local property developer commented that the council should not seek to replicate the role of other statutory bodies as the burden of combined policy requirements can impact on the viability of developments.

The Action Group stated that sewage overflow now counts as flooding and needs to be considered, and refers to objections made to previous planning applications in Wrea Green.

Council response

The council notes LCC's comments. The SuDs hierarchy is already set out at policy **CL2** and in paragraph **13.37**.

In response to comments made by the EA, the council has taken these all on board and will review the wording of this policy and justification and make the appropriate changes to the RPO, as recommended.

The council agrees with the comments made by United Utilities and will make the relevant amendments and additions based upon their comments as outlined above.

The council will amend the text in parts **(1), (2) and (3)** as suggested by United Utilities and will also add a line of text within policy **CL2** in relation to discharge rates and pre-application discussions.

The council notes Bryning with Warton Parish Council's comments on wastewater matters.

The council disagrees with the comments made by the developer.

The Action Group's comments are noted, however this issue is covered under the Joint Lancashire Minerals and Waste local Plan.

Recommendations for change

- Add the following text at the end of paragraph **13.36**: 'There is a failing shellfish water (Ribble Estuary) which is of concern to Fylde Council.'
- Amend the third sentence in paragraph **13.37** to read 'There is ~~an emerging~~ national hierarchy to which surface water run-off is to be discharged.'
- Add the following text to paragraph **13.37** 'LCC will require evidence to demonstrate that infiltration is not possible before other surface water discharge options will be approved.'
- Add the following text at the end of paragraph **13.37**: 'which is referenced in Planning Practice Guidance (the PPG).'
- Add the following text at the end of paragraph **13.40**: 'As surface water management now falls under the remit of LCC, the implementation of SuDS should be in accordance with the principles in the emerging LCC SuDS Guidance document.'
- Refer to the 'Non-statutory Technical Standards for SuDs' produced by DEFRA.
- Amend the text at the end of paragraph **13.42** to read LCC's 'SuD's: Local Specifications, Standards and Policies' will be adopted in 2016.
- Add the following text at the end of paragraph **13.43**: '('Climate Change Allowances for Planners', prepared by the Environment Agency).'
- Amend the text to reflect that the implementation of SuDs refers to significant refurbishments and/or redevelopment.

- Add the following sentence to the first paragraph in policy **CL2** ‘Discharge rates should be agreed as part of any pre-application negotiations between the relevant parties.’
- Add the word ‘Controlled’ to the beginning of each line in parts (1), (2) and (3) of policy **CL2**, e.g. ‘Controlled discharge of rainwater.....’

Policy CL3: Renewable and Low Carbon Energy Generation

Number of representations:

Comment	Support	Object	Total
3	1	3	7

Representations received from:

- Natural England
- BAE Systems Real Estate Solutions
- Treales Roseacre and Wharles Parish Council
- 1 Developer
- 1 Action Group

What you said

Natural England referred to solar development, and other development that reduces the amount of available land to SPA birds. The policy mentions mitigation, which is welcomed but where LSE is triggered in most cases the mitigation needs to be in place prior to development and as such this policy needs to be re-worded to reflect this.

*BAE Systems Real Estate Solutions welcomed the inclusion in criterion h) of policy **CL3** to safeguard BAE’s aviation and defence systems, in particular wind turbine developments should not be allowed in locations that could compromise BAE System’s flight safety systems. They also suggest that there is a specific policy which restricts development within the vicinity of the Warton Aerodrome.*

*Treales, Roseacre and Wharles Parish Council commented that paragraph **13.47** makes an incorrect statement that oil and gas prices are rising, and that we should make more use of hydrocarbon in the form of coal. They question that if development of on-shore wind energy generation in **Table 7** is consistent with current UK Government policy, how will it be delivered? The Plan appears to be silent on reduction in energy consumption, through insulation, energy efficiency and load management, which is a cheaper option.*

A developer supported the need to improve the carbon footprint of new development, but considered the council needed to ensure that requirements does not hinder viability of schemes.

An Action Group stated that as crops are being fed into anaerobic digesters there is now a shortfall of animal feed. Additionally, have the council considered wave power or even getting domestic clean water to drive mini-hydro generators? They also referred to a planning application in Wrea Green which has no bearing on this consultation exercise.

Council response

The council notes Natural England comments and amendments will be made to the wording of policy **CL3**. The majority of Natural England's comments have been dealt with in more detail as part of the responses report for the **HRA**.

The council notes Treales, Roseacre and Wharles Parish Council's comments. The council is working with Wyre and Blackpool Councils to commission an update to the LCC study on renewable energy and the outcome of this work will feed into the Local Plan.

The council notes BAE System's Real Estate Solutions comments, however, in the interests of delivering a flexible plan, the council does not consider that a separate policy is necessary. The council will continue to consult with BAE Systems over planning applications and comments made as part of that process will be taken as a material consideration in determining any planning application.

The council notes the comments made by the developer, however it considers that renewable and low carbon energy generation is achievable in all new development no matter the size.

The Action Group's comments have been noted, as stated in the RPO all types of renewable and low carbon generation will be considered.

Recommendations for change

- Add additional text to the paragraph after criterion i) in policy **CL3** to read: '...to the scale and type of development. However any proposed mitigation must be in place prior to the start of development.'

Additional recommendations for change

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

Additional textual changes

- Add the following text at the end of criterion d) in policy **CL3: Project-specific Habitats Regulations Assessments of any wind farm or solar farm developments near to the Ribble and Alt Estuaries SPA/Ramsar sites will be required, and these HRAs will need to demonstrate that there will be no significant effect on the qualifying features of these sites before they can be granted consent;**

Policy CL4: Decentralised Energy Networks and District Heating System

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representations received from:

- 1 Developer

What you said

A developer objected as a major development includes sites of 10 homes or more and states that a 10 home' scheme cannot reasonably be expected to explore the potential for such systems.

Council response

The council notes the developer's comments, and although the policy reads 'Small scale decentralised energy schemes will be *encouraged* within new development...', for clarification purposes the council will amend the wording of the final sentence in paragraph **13.55** to refer to strategic development schemes comprising 100 or more homes or 1000m² of new industrial floor-space.

Recommendations for change

- Amend the final sentence in paragraph **13.55** to read: ‘Delivering schemes will be more viable in new development, therefore the policy applies to ~~major~~ strategic development schemes only (100 or more homes or 1000m² of new industrial floor-space)’.

Additional recommendations for change

The following additional changes were proposed to update the text in policy **CL4** to make it more robust and fit for purpose which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend policy **CL4** to read: ‘All strategic ~~major~~ developments, ~~as defined by the Town and Country Planning (Development Procedure) (England) Order 2010 of 100+ homes,~~ will be required to explore the potential for decentralised energy supply and district heating / cooling systems. Strategic ~~major~~ developments located where a decentralised energy supply ...’

Chapter 14: Conserving and Enhancing the Natural, Historic and Built Environment**Chapter 14: General Comments****Number of representations:**

Comment	Support	Object	Total
1	1	0	2

Representations received from:

- Historic England
- Campaign to Protect Rural England (CRPE) – Fylde District

What you said

Historic England had no comments to make on the content of the RPO at this stage.

CPRE – Fylde District commended the stated intentions to protect, conserve and enhance Fylde’s natural environment, in particular the landscape and coastal character and biodiversity assets. They also noted that an updated Open Space Study will be produced to inform the Publication version.

Council response

The council notes Historic England’s and the CPRE – Fylde District’s comments.

Recommendations for change

- None

Policy ENV1: Landscape**Number of representations:**

Comment	Support	Object	Total
5	0	3	8

Representations received from:

- Campaign to Protect Rural England (CRPE) – Fylde District
- 1 Landowner
- 1 Action Group

- 1 Resident

What you said

One resident although generally supportive of the policy, did not consider the policy strong enough as it states in paragraph 14.6 that the council will ‘encourage’ appropriate landscaping and does not consider that this has been enforced on developments around Warton.

*A landowner requested that the wording in criterion b) of policy **ENV1** be revised to accurately reflect the wording of the Framework. They have also asked that the phrase ‘or any subsequent update’ is added in reference to the Lancashire Landscape Character Assessment;*

Area of Tranquillity

The CPRE – Fylde District recommended a reference be made to its campaign to protect tranquillity, and to use its mapping to identify specific areas in the RPO. Furthermore, this section should be named Tranquillity only and the spelling changed. In addition, more description is required regarding what tranquillity is and the council should refer to tranquillity explicitly in policy.

An Action Group questioned that these areas will not be helped by 5-10 years of construction, and that a local business would breach all of the requirements set in this policy.

A resident, although generally in agreement with preserving the tranquillity of the countryside, did not know how the policy would seek to enforce its principles, as some outdoor sports are at odds with the concept.

Council response

In response to the resident’s comment, the wording of ‘encourage’ is present in the justification paragraph and not specifically in the policy. Each planning application will be assessed on its own merits and any accompanying landscape scheme would be assessed fully in line with the policy aims.

The council does not agree that the wording in criterion b) of policy **ENV1** needs to be amended. However, it does acknowledge that the Lancashire Landscape Character Assessment may be updated within the plan period, so a caveat will be included.

Area of Tranquillity

The council notes the misspelling of ‘Tranquillity’ and it will be changed accordingly. However, the council disagree with the CPRE – Fylde District that the title of this section needs to be changed. The council recognises further wording and clarification is required within the policy to satisfactorily protect Areas of Tranquillity.

The council notes the Action Group's comments. However, it is recognised that development will often create some noise and disruption during construction, and that existing businesses cannot be unreasonably restricted due to changes in nearby land uses, as stated in the Framework.

In response to the local resident, an Area of Tranquillity is defined as a place sufficiently far from the visual or noise intrusion of development or traffic to be considered unspoilt by urban influences, and unfortunately sports and recreation activities cannot be precluded from these areas.

Recommendations for change

- Spelling of 'Tranquility' amended to 'Tranquillity', throughout the text.
- Add and amend the following text in policy **ENV1** to read 'Development will be assessed to consider whether it is appropriate to the landscape character ~~type~~, amenity and tranquillity within which it is situated.....'
- Amend the second sentence in policy **ENV1** to read: '... Lancashire Landscape Character Assessment, December 2000 or any subsequent update.'
- Add the following text to the end of the second sentence in paragraph **14.8**: 'and the Catchment Flood Management Plan seek to manage run-off rates and minimise flood risk.'
- Make text changes to paragraphs **14.16 and 14.17** to make reference to what the definition of Tranquillity actually is.

Additional recommendations for change

The following additional changes were proposed to update the text on development in the countryside which will appear in the Publication version of the Local Plan; and by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal of the RPO version of the Local Plan.

Additional textual changes

- Amend criterion a) in policy **ENV1** to read: 'by land ~~outside settlement boundaries~~ in the Countryside'
- Amend criterion iii) in policy **ENV1** to read: 'Does not adversely affect the nature conservation assets of the coastline, predominantly the Ribble and Alt Estuaries SPA/Ramsar. Project specific Habitats Regulations Assessments (HRAs) will be required for any tourism and coastal defence developments near to the Ribble and Alt Estuaries SPA/Ramsar. The HRAs will need to demonstrate that there will be no significant effect

upon European Sites before the tourism and coastal defence developments can be granted consent.'

Policy ENV2: Biodiversity

Number of representations:

Comment	Support	Object	Total
1	1	0	2

Representations received from:

- Natural England

What you said

Natural England welcomed the commitment to produce a Supplementary Planning Document on Biodiversity, and suggest it would be useful to add some text to the plan outlining the purpose of the SPD.

Council response

The council acknowledges Natural England's comments and will add text to paragraph **14.24** regarding the proposed SPD. The council will also work closer with Natural England on the scoping and development of this SPD.

Recommendations for change

- Add additional text in paragraph **14.24**, in regards to the proposed Supplementary Planning Document on Biodiversity and its purpose.

Additional recommendations for change

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

Additional textual changes

- Add the following text to the paragraph after criterion i) in policy **ENV2**: ‘predominantly the Ribble and Alt Estuaries SPA / Ramsar site.’
- Amend the text in policy **ENV2** to read: ‘...which ~~will be~~ are identified on the Policies

Policy ENV3: Development in the Nature Improvement Area

Number of representations:

Comment	Support	Object	Total
0	2	0	2

Representations received from:

- Canal and River Trust (formerly British Waterways)
- Campaign to Protect Rural England (CPRE) – Fylde District

What you said

The Canal and River Trust (formerly British Waterways) welcomed the recognition of the Lancaster Canal as a designated biological heritage site.

The CPRE – Fylde District commended the intension to define a ‘Nature Improvement Area’ in Fylde, and in the absence of any details would expect an Area such as this be produced in accordance with DEFRA criteria, with the involvement of the Local Nature Partnership.

Council response

The council acknowledges the Canal and River Trust (formerly British Waterways) comments.

The council agrees with CPRE – Fylde District to follow all relevant up-to-date legislation, in regards to Nature Improvement Areas, in accordance with DEFRA guidelines.

Recommendations for change

- None

Policy ENV4: Protecting Existing Open Space (the Green Infrastructure network)

Number of representations:			
Comment	Support	Object	Total
4	1	0	5

Representations received from:

- Sport England
- Blackpool Council – Planning
- Canal and River Trust (formerly British Waterways)
- 1 Resident

What you said

Sport England commented that they had been unable to determine whether any of the proposed allocations are located on existing playing field or land last used as playing field. And that they would object to any allocation that affects an existing or lapsed playing field unless the emerging Playing Pitch Strategy clearly demonstrates the site is surplus to requirement.

Blackpool Council suggested that reference could be made in the Plan to the Rights of Way Improvement Plan.

The Canal and River Trust (formerly British Waterways) welcomed the recognition given to the Lancaster Canal as a Green Infrastructure.

The resident suggested that green corridors, as well as access to recreational areas are all improved with proper kerbed designed cycle paths. This should be further detailed in the Plan to ensure no short cuts and bad designs are accepted by people not understanding cycling needs to a proper level. Cycling will encourage Green programmes and will reduce carbon emissions. Protected cycle ways will encourage more cycling and increase the Green footprint of Fylde. In addition policy T3 must be pulled out by cycle groups and must be seen in the Plan as key in all planning and green thinking.

Council response

In response to Sport England's comments, as part of a planning application process the appropriate statutory consultees will be consulted. In addition, the council has commissioned KKP consultants to prepare a Playing Pitch Strategy and to update the Open Space, Sport and Recreation Study. The results and recommendations in the Playing Pitch Strategy and the updated Open Space Study should be available for the Publication version of the Plan.

The council agrees with Blackpool Council's comments and will make reference to the Rights of Way Improvement Plan, either in the justification section or in policy **ENV4**.

The council acknowledges the Canal and River Trust (formerly British Waterways) comments.

In response to the comments made by the resident, the council does not agree that specific details in regards to kerbed designed cycle paths are necessary within the Plan. Each planning application submitted would be assessed on its own merits and the relevant statutory body consulted to ensure the development is designed and built to the correct specifications. Cycle provision is also set out in detail in **section 2** of the **Infrastructure Delivery Plan (IDP)** and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council consider that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- Add the following sentence at the end of paragraph **14.41**: 'LCC has prepared a Rights of Way Improvement Plan.'

Additional recommendations for change

The following additional changes were proposed to update the text in policy **ENV4** which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **14.38** to read: 'The Framework requires Councils to plan positively for the creation, protection, enhancement and management of biodiversity and Green Infrastructure. Despite an abundance of resources that contribute to the Green Infrastructure network, there are deficiencies in Fylde and access to some of the Borough's most important Green Infrastructure assets is limited poor. New evidence ~~will~~ has been provided from the updated Open Space and Recreation Study and the new Playing Pitch Strategy, both of which were issued in 2016. There is also the opportunity to improve the potential of some of Fylde's most important assets and to link into Green Infrastructure network in neighbouring authority areas.'
- Amend the first sentence of paragraph **14.39** to read: 'Policy ENV4 seeks to protect existing open space (the Green Infrastructure network), as set out in paragraph **14.37** ~~14.39~~.'
- Amend paragraph **14.43** to read: 'An updated ~~of the evidence on the~~ Open Space and Recreation Study, together with a new Playing Pitch Strategy have been issued, ~~is currently underway to which~~ have informed the preparation of this Publication version ~~this Fylde Local Plan to 2032~~.'

Policy ENV5: Provision of New Open Space (the Green Infrastructure network)
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Number of representations:			
Comment	Support	Object	Total
5	0	1	6

Representations received from:

- 2 Developers
- 1 Resident

What you said

One developer commented that the provision of 100 plus homes was excessive and should be carefully considered against the viability of development as these could significantly impact the capacity of development sites, and stated that they did not feel that the supply in area generates this level of need in new development.

*Another developer objected to policy **ENV5** as it is reliant on evidence presented in the council's Open Space, Sport and Recreation Study 2008 and as such is not justified by up-to-date evidence, so the council's position is not aligned with the Framework and the policy is unsound.*

A resident considered this policy to be long term and would cost considerably for a relatively low use. But if the council focussed on large, wide, straight, flat urban roads, this will encourage cycling and make the coast path more viable due to local demand. While the Guild Wheel might go in the near future encouraging cycling as a tourist draw will be good for the Fylde but this will take more than a decade and will not show a return on investment to justify it in the next decade. A key point which links safe cycling to encouraging people into sport and achieving green objectives.

Council response

The council disagrees with comments made by both developers. Firstly, the policy quite clearly states that the council will be flexible in its approach to requiring new open space. Open space to be provided, or commuted payments to be made will be fairly and reasonably related in scale and kind to the development proposal. The requirement will be modified or even removed where it can be shown by the developer that there is an existing over-provision of open space in the locality.

Comments made by the resident have been noted, however, the Local Plan and its policies are not just about planning for the here and now but for the future of Fylde until 2032 and further. This policy will help secure funding for opportunities to create new open spaces and additional monies generated may also go to improving and enhancing existing open spaces

and other Green Infrastructure linkages, including cycle networks in Fylde. Cycle provision is further set out in further detail in **section 2** of the **Infrastructure Delivery Plan (IDP)** and the associated Delivery Schedule at the back of the IDP, which includes LCC's Cycle Scheme Identification Study which is currently taking place (i.e. 2015/16) with the start of works planned for 2016/17. The council consider that although not all cycle routes are marked out as part of this study improvements can be promoted and undertaken.

Recommendations for change

- None

Additional recommendations for change

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

Additional textual changes

- Amend the second sentence in policy **ENV5** to read: 'Such safe green open space ...'

Policy ENV6: Historic Environment

Number of representations:

Comment	Support	Object	Total
3	0	6	9

Representations received from:

- The National Trust
- Lytham St Annes Civic Society
- 1 Action Group
- 1 Resident

What you said

The National Trust suggested that the wording related to Listed Buildings should be changed to read ...Fylde's Listed Buildings and their settings will be conserved and, where appropriate,

enhanced. Any harm to or loss of the significance of a listed building ~~and~~ or its setting will be refused....

Lytham St Annes Civic Society were pleased to see that Character Appraisals and Management Plans for Conservation Areas are going to be prepared, and hope that these are at the beginning of the plan and not at the end.

The Action Group, made the following comments:

- *Question where the list for the heritage assets of local interest is?*
- *What are the two planned model rural settlements and why have these two villages been chosen?*
- *To allow Public Rights of Way and the views from them to be "Heritage Assets", and that to allow high hedges to "fence off" solar panel farms will erode these.*
- *Wrea Green has been awaiting for a Conservation Area appraisal since the Conservation Area was declared. What are the timescales for undertaking these?*

A resident commented that the council's failure to produce a local plan in a timely way has led to development or applications for development which are neither required nor desired. Therefore would like to see land at Dowbridge designated as an area of archaeological importance given that extensive roman remains may be hidden under the undisturbed surface.

Council response

The council will amend the text in line with the National Trust's comments, however the word 'or' will be added instead of removing the word 'and'.

Work has started on updating and producing Conservation Area appraisals, all of which will be in place and regularly updated and maintained within the plan period.

The council notes the questions and comments raised by the Action Group and provides the following response:

- The council is in the process of forming a Local List which will be completed well within the plan period.
- The two 'planned' model villages are Singleton and Thistleton, and are named such due to being developed as part of a large country estate. As such, as they were specifically 'planned'.
- As far as the council is aware there are no public rights of way in Fylde classed as Heritage Assets, and landscaping as part of a planning application will be assessed on its own merit.
- As stated above, work has started on updating and producing Conservation Area appraisals, all of which will be in place and regularly updated and maintained within the plan period, including the Wrea Green Conservation Area.

In response to the local resident's request for designating Dowbridge as an area of archaeological importance, it may be that after the council has completed its local list of Heritage Assets, further designations will be proposed.

Recommendations for change

- Change the text in the first paragraph under ‘Listed Buildings’ in policy **ENV6** to include the following wording: ‘Any harm to or loss of the significance of a listed building and/or its setting will be refused’.

Additional recommendations for change

The following additional change is proposed to update the text in the Publication version of the Local Plan.

Additional textual changes

- Amend criterion 4) under ‘Conservation Area’ in policy **ENV6** to read: ‘Not result in the loss of open space (the Green Infrastructure network);’

Chapter 15: Next Steps**Chapter 15: General Comments****Number of representations:**

Comment	Support	Object	Total
0	0	0	0

No representations were received to Chapter 15.

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to be made to update the text in Chapter 15 which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend paragraph **15.1** to update the text for the Publication version, to read: ‘The ~~Revised Preferred Option~~ Publication version of the new Local Plan will be available for you to view and to submit your representations regarding soundness to Fylde Council for **six weeks in July and August 2016** ~~15 October and 3 December 2015~~. To view the ~~Revised Preferred Option~~ Publication version document or for more information ~~and for details of the drop in events~~, please visit www.fylde.gov.uk/localplan/ or contact the Planning Policy Team on Tel. 01253 658418 or email: planningpolicy@fylde.gov.uk.’
- Delete the sub-heading: ‘~~Public Events~~’
- Delete paragraph **15.5**: ‘~~The Planning Policy Team will host drop in sessions during the seven week consultation period, providing information about the Revised Preferred Option version of the new Local Plan and the IDP. The drop in sessions will also provide the opportunity for the public to come along and ask questions about the new Local Plan and the IDP and for guidance on submitting comments~~’.
- Amend paragraph **15.6** to read: ‘~~After the consultation into the RPO version of the Local Plan and the IDP, the Council will consider all of the comments received. The Council will also consider the findings of the technical assessments (the Sustainability Appraisal, the Habitats Regulations Assessment, the Health and Equalities Impact Assessment, the Rural Proofing Assessment and the Viability~~

~~Assessment) and any new evidence and changes to Government guidance. All of this information will be used to write the~~ This Publication vVersion which will form the final round of consultation on the Local Plan to 2032, following which the document will be submitted (i.e. the Submission version) to the Secretary of State, who will appoint an independent Inspector to carry out an Examination in Public (EiP) – i.e. a public inquiry - into the soundness of the document.’

Glossary and Appendices

Glossary

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to the Glossary

Recommendations for change

- None.

Additional recommendations for change

The following additional changes were proposed to update the Glossary in the Local Plan; together with amendments proposed by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal to the RPO version of the Local Plan.

Additional textual changes

- Add the following text at the end of the definition of ‘**Affordable Housing**’ in the Glossary: ‘For the purposes of policy H4, in addition to **Registered Providers**, as defined in the Housing Act 2004, the Local Planning Authority will treat the delivery of affordable housing by a body which is not a Registered Provider, but is able to assure the Council that it operates to the same codes of practice as a Registered Provider.’
- Add the following definition in the Glossary: ‘**Flood Risk Management** - The process of balancing the needs of flood defence with the needs of the environment and people.’
- Add the following definition in the Glossary: ‘**Foreshore** – The area between the lowest level of tide to the highest level of tide.’
- Amend the following definition in the Glossary: ‘Large Developed Sites in the Countryside - ~~in open land outside settlement boundaries~~: Large developed sites ~~within open land outside settlement boundaries~~’ in the Countryside, including ~~HM Kirkham~~ Prison Kirkham, Weeton Barracks Camp and Ribby Hall Village, but excluding farms and employment sites.

- Delete the following definition in the Glossary: ‘~~Open Land outside settlement boundaries – Areas outside towns and rural settlements~~’ and replace throughout the plan with the following text: ‘**Land in the Countryside.**’
- Add the following definition to the Glossary: ‘**Natura 2000 sites - A network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designated respectively under the Habitats Directive and Birds Directive. The network includes both terrestrial and marine sites (Marine Protected Areas).**’
- Delete the following definition from the Glossary: ‘~~**Phasing or Phased Development** – The phasing of development into manageable parts. For example, an annual rate of housing release for large development that may need to be controlled to avoid destabilising housing markets and causing low demand.~~’
- Amend the following definition in the Glossary by adding the underlined text: ‘**Sub-region** - An area covering more than one local authority area, i.e. Fylde Coast or Central Lancashire.’

Appendix 1: Schedule of saved policies from the Fylde Borough Local Plan (As Altered), October 2005

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to **Appendix 1**

Recommendations for change

- None

Additional recommendations for change

The following additional changes are proposed to be made to **Appendix 1** to update the text and to amend the policy numbers which will appear in the Publication version of the Local Plan, following the recommendations in this Responses Report for the drafting of new policies and changing the order that policies appear in chapter 9.

Additional textual changes

- The title in the second column in the Table in **Appendix 1** to be amended to read: ‘To be replaced by policies in the Fylde Local Plan to 2032 (policy numbers in the ~~Revised Preferred Option~~ Publication version)’
- Amend all references to policy **GD5** to read: ‘Large Developed Sites in ~~open land outside settlement boundaries~~ the Countryside’
- Amend all references to ‘Policy ~~EC4~~ **EC2** – Employment Opportunities’
- Amend all references to ‘Policy ~~EC2~~ **GD8** – Demonstrating Viability’
- Add the following text to the second column relating to **CF2** – Site for a new school at Mowbreck Lane, Wesham: ‘Policy **HW2** – Community Facilities’
- Amend the text in the third column of the Table in **Appendix 1** to read: ‘NPPF Paragraph of the Framework’

Appendix 2 Housing Trajectory

Number of representations:			
Comment	Support	Object	Total
3	0	0	3

Representations received from:

- Bryning with Warton Parish Council
- 2 Developers

What you said

Bryning with Warton Parish Council commented that the Housing Trajectory should reflect the 800 permissions granted to date.

*A developer commented that **Appendix 2** of the RPO states that site **HSS1** – Queensway, St Annes will deliver 60-75 homes per annum between 2016 and 2032. The plan is unclear what assumptions are being applied by the council relating to the delivery rates of this site. It is understood that Kensington Developments intend to deliver the whole site alone. The council has not provided any evidence to the contrary. Our client considers the delivery of 60-75 homes per annum to be unrealistic for one developer. In reality it is more likely to be 30dph, delivery rates will also be slowed due to infrastructure requirements, in particular the M55 to Heyhouses Link road which does not have capital committed for its implementation. At a more realistic delivery rate at 30dpa it is expected that the site will deliver 630 homes over the plan period, therefore further sites should be allocated as part of the Local Plan.*

*A developer objected claiming that we do not expect 100-110 homes per annum to be delivered at the Whyndyke Farm site **MUS2** given the associated infrastructure requirements. This site will be developed by multiple housebuilders and it should be assumed that rates will be marginally decreased proportionately with each new additional developer to take account of the effects of market saturation. It is unlikely that the full 1,310 homes will not be delivered in the plan period therefore to meet the Objectively Assessed Need, further sites should be allocated.*

*A developer objected that site **HSS5** - Cropper Road West is not suitable for development as significant highway improvements to Cropper Road would be required, also the site is currently unavailable and in multiple ownership, no evidence has been provided that the site will be available in the long term. Market competition from other sites in the Fylde-Blackpool Periphery will dampen delivery rates.*

A developer raised concerns with the deliverability of the Strategic Locations for Development in Lytham St Annes and the Fylde-Blackpool Periphery and there is a lack of evidence as to how the council calculated their delivery rates. The failure of the delivery of these sites would represent a fundamental failing of the plan, unless significantly greater provision is found through further allocations.

Another developer commented that the council may wish to identify likely timescales for delivery through a trajectory but should not seek to stall sustainable and deliverable sites from coming forward, this will simply thwart development and will create difficulties for the council in achieving its 5 year supply of housing.

Council response

The council agrees that the housing trajectory in **Appendix 2** is out of date, it will be updated to a base date of 31st March 2016. All of the permissions which have been granted from 31st March 2015 to 31st March 2016 will be included in the trajectory.

The build out rates are included in the council's Five Year Supply Statement, and are included in the council's response to the Five Year Supply calculation. The lead in times to the commencement of completions and the build out rates were agreed with representatives of the development industry, including the proposed developers of Queensway, via the Strategic Housing Land Availability Assessment Steering Group. The proposed developers of Queensway have recently advised the council that they propose to complete the site in excess of the completion rates assumed in the trajectory.

Evidence provided by developers demonstrates that site **MUS2** - Whyndyke Farm will be delivered within the plan period. Indeed partners from the health service, LCC, YMCA, Blackpool and Public Health are pitching a bid to NHS England for Whyndyke Farm to be a Healthy New Town Pilot, even if the bid is unsuccessful the partners involved (including the developer) have made a commitment to ensure that this development will be designed to enable healthy living and healthy lifestyles.

With respect to site **HSS5** – Cropper Road West, highways improvements are required. The site is available, all of the landowners involved have formed a group and approached the council to say that they wish the whole site to be developed comprehensively.

No detail has been provided about the concerns with the deliverability of the Strategic Locations in Lytham St Annes and the Fylde-Blackpool Periphery. At Lytham St Annes the Heyhouses site has been built out and the former Pontins site is under construction. At the Fylde Blackpool Periphery there are also sites under construction east of Cropper Road and off Lytham St Annes way. When the trajectory is updated to a base date of 31st March 2016 it will be clear that there have been significant amounts of development in both locations.

With respect to the final comment. The council has not attempted to phase the delivery of sites, neither does it seek to stall sustainable and deliverable sites from coming forward. The lead in times for sites commencing and the build out rates were agreed by the SHLAA Steering Group which includes representatives of the development industry. The council will continue to use these assumptions.

Recommendations for change

- The housing trajectory set out in Appendix will be updated to a base date of 31st March 2016.
- The assumptions used with respect to lead-in times and build out rates will be cross-referenced at paragraph **10.15** by a cross reference to the Strategic Housing Land Availability Assessment (SHLAA).
- Another row of figures will be added to the housing trajectory with respect to dealing with the shortfall in housing provision moving forward from 2016.

Appendix 3: Retail Boundaries Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 3.

Recommendations for change

- None

Additional recommendations for change

The following additional change was recommended to update the text in Appendix 3, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the text for **Whitehills** under **New Local Centres** to read: '**Whitehills (Fylde-Blackpool Periphery Strategic Location for Development)** – This is proposed to have a new Local Centre by the end of the Plan period'.

Appendix 4: Holiday Area(s) Boundary Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 4.

Recommendations for change

- None

Additional recommendations for change

The following additional changes were proposed to update the text in Appendix 4, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the second sentence in Appendix 4 to read: ‘There is no need to distinguish between Primary Holiday Areas as Secondary Holiday Areas were not taken forward in the Local Plan at the Preferred Option stage or the Revised Preferred Option stage’.
- Amend the text under North Promenade, St Annes in Appendix 4 to read: ‘Holiday Area designation does not now apply here at North Promenade, St Annes’.
- Amend the first line under South Promenade, St Annes in Appendix 4 to read: ‘The previous Primary Holiday Area at South Promenade, St Annes has been split into two smaller areas’

Appendix 5: Sea Front Area(s) Boundary Review

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 5.

Recommendations for change

- None

Additional recommendations for change

The following additional change was recommended to update the text in Appendix 5, which will appear in the Publication version of the Local Plan.

Additional textual changes

- Amend the last sentence of **Fairhaven Lake Sea Front Area, Ansdell / Fairhaven** to read: 'Rather, Fairhaven Lake ~~it~~ should be subject to policy ENV6: the Heritage Assets Historic Environment policy (ENV6) in Chapter 14.'

Appendix 6: Existing Employment Sites Review

Number of representations:			
Comment	Support	Object	Total
1	0	1	2

Representations received from:

- Bryning with Warton Parish Council
- 1 Action Group

What you said

It was stated that the Land Registry site at Warton is referenced under Wrea Green.

Bryning with Warton Parish Council stated that Freckleton Boatyard, Warton is not considered suitable as an Employment site due to the extremely poor transport access to the site and distance from infrastructure facilities.

Council response

The council will amend the text relating to Land Registry, Warton so as to correct the typographical error.

At Freckleton Boatyard current uses fall within Use Classes B1(c) and B8. As an active boatyard, the only such facility in the Fylde section of the Ribble Estuary, it is recommended that the facility should be adopted as an employment area in the development plan. Such an allocation could limit appropriate uses in the area to boat building/boat repair and storage.

Recommendations for change

- Amend and move the following text in **Appendix 6** on page 264 which is currently under the sub-heading '**Wrea Green**' to the sub-heading '**Warton**' - 'Land Registry, Warton, ~~Wrea Green~~ - Active government office, which should be retained in employment use'.

Appendix 7: Biological Heritage Sites in Fylde

Number of representations:

Comment	Support	Object	Total
0	0	0	0

No representations were received to Appendix 7

Recommendations for change

- None

Appendix 8: Performance Monitoring Framework

Number of representations: 0			
Comment	Support	Object	Total
0	0	2	2

Representations received from:

- Blackpool, Fylde and Wyre Trades Union Council
- 1 Action Group

What you said

Blackpool, Fylde and Wyre Trades Union Council welcomed new development in Fylde, however they make the following comments:

- *Would like to see development works being carried out by local workers to provide income to local people and keep money in the local economy;*
- *The plan should not include any extension of fossil fuel extraction via the shale gas method, as it has increasingly recognised potential health and other risks associated with it;*
- *Social housing should be included to take account of local need and the dramatic drop in owner occupiers;*
- *There is a school and education deficiency and new development will bring further stresses on this, any new schools should be community schools and not academies or free schools.*

Overall there is some concern that the Key Indicators, claims to stick to things which are easily measured but do not properly face up to several of the key issues raised above.

The Action Group commented on the following indicators:

- *Indicator 1 – Target housing needs to be broken down by location, tenure and type;*
- *Indicator 3 – This may need to be adjusted of the Employment Vision does not come to fruition to prevent over-supply;*
- *Indicator 14 – Why just travel to work data? Given the high level of retired residents, are not most trips in relation to shopping and leisure?*
- *Indicator 15 – Some trains are already overfull – so that needs to be an indicator;*
- *Indicator 19c – Wrea Green has been waiting 17 years for its initial appraisal;*
- *Indicator 19d – when is the target date for establishing this list?*

Council response

In response to the comments made by the Blackpool, Fylde and Wyre Trades Union Council the council makes the following comments:

- The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of S106 when planning permission is granted. It is not something the council would seek to influence through

Local Plan policy. However, controlling and regulating this falls outside the council's remit to make it a policy requirement. There are instances where other local authorities have made it a provision/clause in their Procurement Framework, and as such it may be a consideration the council can discuss further as part of the organisation's remit.

- In respect to shale gas extraction, the impacts of shale gas exploration are still unknown. There are counter arguments for and against shale gas exploration and the industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan.
- The council considers that policy **H4**, Affordable Housing, is a robust, sound policy which will look after the needs of local people.
- The council is aware of the need for additional education spaces and is working closely with the educational authority and, as such, the council will be taking its direction from them as the local education providers.

The council notes the comments made by the Action Group. The council will publish an Authority Monitoring Report (an AMR) on a yearly basis and these indicators will be used to assess and monitor various data to ensure policies are working effectively. There is no target date set for establishing a Local List of Heritage Assets, however the process has started and will be completed well within the plan period.

Recommendations for change

- The suggestion that construction work is to be undertaken by local workers is something which can possibly be implemented by way of a S106 Agreement when planning permission is granted. It is not something the council would seek to influence through Local Plan policy. The council will investigate the possibility of introducing a clause within Fylde Borough Council's Procurement Framework to ensure that a certain % of local labour is used within any development it undertakes.
- To check that all data collected from the indicators is accessible and relevant to assessing individual policies.

Additional recommendations for change

The following additional changes are proposed to ensure the text is robust and up-to-date and it refers to the Publication version of the Local Plan.

Additional textual changes

- Delete the following paragraph in **Appendix 8** to update the text ready for the Publication version: ‘~~There were 18 indicators in the Preferred Option version of the Local Plan. Indicators 11 and 13 and 17 from the Preferred Option version have been removed following representations received during the consultation into the Part 1 document in summer 2013. Four extra indicators have been added to the Revised Preferred Option version to ensure the robustness of the document, including: the retention of retail floor space in Lytham, St Annes and Kirkham town centres (new performance monitoring indicator 7); the retention of leisure, culture and tourism uses in the Island Sea Front Area (new performance monitoring indicator 8); the retention of serviced tourism accommodation in the Holiday Areas (new performance monitoring indicator 9); and to minimise the amount of inappropriate development in Flood Zones 2 and 3 (new performance monitoring indicator 16). Performance monitoring indicator 19 has been sub-divided into 4 sections: 19a, 19b, 19c and 19d so as to monitor buildings at risk, the loss of listed buildings to development, the maintenance of up-to-date Conservation Area Appraisals and the publication of a local list of heritage assets’.~~
- Amend the subsequent paragraph in **Appendix 8**: ‘~~Consequently, †There are now~~ **nineteen performance monitoring indicators** in the Revised Preferred Option Publication version of the Local Plan. This relatively small number of targets has been chosen for inclusion in the Performance Monitoring Framework so as to avoid duplicate, unreliable or difficult to collect indicators; to ensure that the indicators chosen align closely with the strategic objectives and the key planning policies and to focus on achievable targets in accordance with the Local Plan’s vision for Fylde. Indicators and targets have not been set out for every policy in the Local Plan’.
- Amend the title in **Appendix 8** to read: ‘**Table 8: of Key Performance Monitoring Indicators** against the policies in the Fylde Local Plan to 2032.’
- Amend the text in the left hand column of the Table in **Appendix 8** to read: ‘Local Plan Policies – Revised Preferred Option Publication version.’
- Amend the text in the third column of the Table in **Appendix 8** to read: ‘**Performance Monitoring Indicator(s)**’
- Amend the target / policy outcome under Indicator **3** in **Appendix 8** to read: ‘To deliver a minimum of **7,770 homes** over the plan period from 1 April 2011 to 31 March 2032.’
- Under Indicator **18** in **Appendix 8** amend the target / policy outcome text to read: ‘Net gains in indoor and outdoor sports facilities ~~itches~~ and open space provision.’
- Under Indicator **19c** in **Appendix 8** amend the monitoring indicator(s) and target / policy outcome text to read: ‘Conservation Area Appraisals and management plans.’

The Draft Infrastructure Delivery Plan (IDP)

The Draft Infrastructure Delivery Plan (IDP): General Comments

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Number of representations:			
Comment	Support	Object	Total
14	1	8	23

Representations received from:

- Highways England
- Environment Agency
- Historic England
- Sport England
- Natural England
- Blackpool Council
- Lancashire County Council
- Bryning with Warton Parish Council
- Newton with Clifton Parish Council
- CPRE - Fylde District
- Canal and River Trust (formerly British Waterways)
- Lytham St Annes Cycle Group
- Lytham St Annes Civic Society
- Lytham St Annes Technology and Performing Arts College
- Newton Residents Association
- 8 Residents

What you said

*The Environment Agency made various detailed comments all of which include suggested specific wording change based upon revision to reflect the current situation, updating factual information, and minor amendments to text in the following paragraphs **3.51, 3.52, 3.53, 3.58, 3.64 and 3.7.***

*Highways England noted references to improved transport infrastructure which are specifically mentioned in RPO Local Plan policies **H1** and **T3**.*

- **H1:** *They question what quantum of development has been used to underpin the transport infrastructure needs and proposals, to confirm that the infrastructure improvements proposed in the Plan and supporting IDP are appropriate and sufficient to accommodate all of the Plan's development and growth aspirations.*
- **T3:** *They note that this policy has been significantly amended and now includes reference to working with Highways England to deliver improvements to transport and infrastructure. The policy and these amendments continue to be supported.*

At this stage Historic England had no comments to make on the content of the IDP.

Sport England made comments relevant to progressing a CIL Charging Schedule and Regulation 123 list. They recommend the following:

- 1. The CIL list includes specific projects for sport facilities (indoor and/or outdoor) and not generic statements.*
- 2. The statement clarifies that:*
 - a. Mitigation for loss under Framework Paragraph 74 falls OUTSIDE of CIL; and*
 - b. Clarification that S106 agreements will be used to secure new sports facilities needed to meet new demand arising from development for sports facilities (indoor and outdoor) where not already sought through the CIL (e.g. CIL may be used to fund a new leisure centre to meet growth in demand for swimming pool BUT S106's would be used to fund all outdoor sport).*

Natural England raised issues of uncertainty in terms of the capacity of existing and proposed infrastructure to meet the demand of future housing. Any uncertainty should be explored to ensure the Plan is compliant with Regulation 102 of the Conservation of Habitats and Species Regulations 2010. Natural England advises that the Local Plan process provides an opportunity to explore strategic infrastructure requirements with the aim of limiting environmental issues at the project stage. Therefore, if further detail on expected infrastructure can be provided at this stage it would help to provide certainty that housing can be delivered during the plan period.

*In particular they sought clarification as to what dialogue has taken place between the council and United Utilities with respect to proposed growth and required infrastructure, taking into account of recent Water Cycle Studies and the Infrastructure Delivery Plan. They state that it would be useful to explain what mechanisms are in place to allow the necessary infrastructure to be provided to facilitate growth and how this is transferred to the Asset Management Plans of the water companies. It is also important that this issue is addressed in the revised HRA. Specific examples where there are considered to be uncertainties in the **Local Plan** are referenced as follows: **6.18**, **7.2**, **7.24** and **7.25**.*

*In relation to the IDP Natural England maintained that the engagement with United Utilities, referred to under paragraph **3.48**, needs to be addressed at this stage to ensure deliverability of the plan.*

Water infrastructure capacity and supply impacts could have an impact on the deliverability of some allocations, which is therefore a soundness issue under the effectiveness test. It is critical to detail the provision that must be in place at this stage. However what is lacking is any detail on existing infrastructure and capacity and what future infrastructure is planned other than reference to possible detailed modelling. There must be viable options available in order to meet wastewater drainage demands otherwise there is concern that some sites will not be delivered, resulting in an unsound plan. This detail must be in the HRA at this stage. Natural England therefore advises the following:

The HRA needs to identify the quantum of development within each wastewater treatment works catchment. The HRA at this stage must demonstrate that options are available to ensure wastewater from planned new development can be treated without

adverse impact upon European sites. Natural England advises that further detail should be provided to explain how impacts should be avoided and/or mitigated for. This will give a higher level of confidence that the areas in question can be developed without resulting in adverse effects on European sites and are therefore deliverable.

Lancashire County Council made numerous detailed comments as follows:

- *Paragraph 2.2 - the Fylde Coast Highways and Transport Masterplan is now adopted.*
- *Paragraph 2.14 - it is unclear what the additional planned work at M55 J1 is.*
- *The narrative on Blackpool Airport needs to be aligned with the updated approach to the Blackpool Airport Corridor Enterprise Zone including the new policy on the EZ.*
- *4.1 to 4.4 are unnecessary as the SPD is no longer publicised by the Council, and the text does not relate to infrastructure provision.*
- *4.5 - There is no reference to commercial or industrial waste in 4.5. Clearly there will continue to be a demand for waste management capacity from existing industries and businesses in Fylde, and any expansion or growth in industries promoted by the draft Plan will add to this demand. However, any waste or minerals infrastructure required as a result of the development of the Fylde Local Plan is more properly addressed through the Minerals and Waste Local Plan, a review of which is ongoing and will involve discussions with Fylde under the duty to cooperate.*
- *Paragraph 6.7 – should make reference to making appropriate education provision and making the development sustainable.*
- *Paragraph 6.9 – should make reference to Developers obtaining an accurate housing assessment which will identify the need for school places.*
- *Comments are made in respect of policy M1 which are also relevant to the IDP. Paragraph 6.17 of the IDP needs to reflect the following: overall the housing provision set out in the Local Plan could bring forward the need for 6.5 additional primary forms of entry and approximately 787 secondary school places over the plan period. Depending on the position and feasibility of expansion of existing schools at the time of delivery of these developments there is a potential requirement for additional primary sites and an additional secondary school site. Given the scale of development, there may be a need to identify additional primary school sites. The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham; this site should remain within the Local Plan.*

Appendix B to Lancashire County Council's response includes specific technical information on education provision. This evidence presents the case for the statement made above.

- *Tables 3 and 4 – Update the Surplus School Places information with data from May 2015.*
- *Because no one development is likely to be of a scale to produce sufficient secondary yield for a new secondary school, there is a need for Fylde Borough Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of this plan. We have been party to initial discussions in*

connection with the identification of a secondary school site in Warton and welcome the opportunity to take these discussions forward.

- *The current adopted Local Plan lists a requirement for a Primary School site off Mowbreck Lane for the possible relocation of the CE Primary School on Garstang Road North, Wesham. Currently this site should remain within the Local Plan.*

- *There are a number of inaccuracies in the table on page 67 relative to its key:*
 - *The A585 Skippool – Windy Harbour scheme is in the current Road Investment Strategy so should be shaded dark orange.*
 - *The Preston Western Distributor is committed, subject to a business case demonstrating value for money and completion of statutory processes, so it should be shaded dark orange.*
 - *Blackpool to Preston electrification will not be completed by December 2015 but by May 2017.*
 - *The Blackpool to London rail service is shaded as uncertain yet it has been delivered.*

In addition to the above Lancashire County Council (LCC) submitted comments which related to an earlier informal draft of the IDP. This informal consultation with infrastructure providers supported by the Development Management (Policy) Committee at its meeting on 17 June 2015. All of LCC's suggested changes and corrections were incorporated in the IDP (September 2015) which was consulted on between Thursday 15 October and Thursday 3 December 2015. Those earlier comments are not reported as part of this responses report as they are not relevant to the consultation version IDP. Only outstanding issues relevant to the consultation version IDP are reported here.

Lytham St Annes Technology and Performing Arts College questioned the validity of the school places data that has been used. The College has 1,391 pupils on roll, meaning there is a capacity of 272 places. They also make reference to the fact that the school has just opened additional provision for post 16 students with Blackpool and the Fylde College utilizing their Ansdell site. The IDP does not appear to take account of this. In effect this has already increased capacity for post 16 students in the area - with a view to ultimately providing 500 places. It is believed that this information substantially reduces the demand for another secondary school in the area.

Blackpool Council have made specific comments in relation to Transport, Primary and Secondary Schools and Health and Social Care which are referenced as follows:

- **Transport**

Paragraphs 2.17 and 2.18 will need updating to reflect Lancashire County Council's impending decision to remove subsidies from a number of bus routes across Lancashire, with the possible termination of those routes by the operators.

Paragraphs 2.23/2.24: It might be useful to refer to the position relating to rail (and tram) linkages in these paragraphs. Rail accessibility is poor for the sites around the M55 junction, but Squires Gate Station lies within the Blackpool Airport Corridor and is accessible to sites HSS4 and ES5; and the Blackpool tramway can be accessed at nearby Starr Gate.

- *Primary and Secondary Schools*

The IDP acknowledges that there are cross boundary issues in terms of school places generated from development at the Fylde-Blackpool Periphery and that there are currently no LCC primary schools within Fylde that would serve this catchment. It also acknowledges that there is pressure on primary school places in Blackpool. The IDP states that the S106 agreement in place for Whyndyke Farm will provide for a new primary school serving the Fylde-Blackpool Periphery.

Whilst the proposed new school will help to address some of the primary educational needs arising from the new development, there may still be pressure placed on Blackpool schools. Therefore, it remains vital that further discussion takes place between Fylde, Blackpool and Lancashire County Councils, as part of the Duty to Cooperate, in order to address the cross-boundary educational issues that may arise from development at the Fylde-Blackpool Periphery. It is suggested that reference to involving Blackpool Council (as well as LCC) could be made in the 'Next Steps' paragraph of the Education section of the IDP.

- *Health and Social Care*

The IDP states that in terms of GP provision, the strategic sites at the Fylde Blackpool Periphery are more closely related to Blackpool than Fylde and that it is anticipated that residents would use facilities such as the new Primary Care Centres at South Shore and Whitegate Drive, with some using services in Kirkham or St Annes. However, there is no reference to a health centre at Whyndyke Farm, which is listed as part of the outline application proposals. Is this still likely to be developed as part of the scheme?

*Bryning with Warton Parish Council suggested that the commitment to create green routes for Warton should be included in the **Appendix 2** table. They also made comments relating the construction of the Preston Western Distributor Road and possible localised congestion issues and the wider economic ramifications.*

Bryning with Warton Parish Council noted that paragraph 2.15 of the IDP acknowledges increased traffic throughout the term of the plan. In doing so Fylde Council finally accepts the concerns persistently voiced by the Parish Council and local community yet it seems from this statement that negligible planning consultation with the County Council has been carried out to review options in advance of the draft plan.

*Bryning with Warton Parish Council supported paragraph 7.53 of the **Local Plan** which references improved facilities at Warton and traffic congestion created by development being partially resolved by developer funded measures. They actively encourage Fylde Council to fully engage with the Parish Councils and local communities in prospective developer's proposals toward necessary amendments in road infrastructure plans.*

Bryning with Warton Parish Council commented that there seems to be a major misconception that the provision of immediate local housing is necessary to support the work force of a major employer like BAE Systems. This obviously supports a developer's view point in building homes but it is really a very archaic view point that seems to have no basis of evidence to support it. BAE Systems at Warton have an actual low percentage of workers who live in the immediate area. In all likelihood academic evidence would dictate that skilled workers have no need or particular desire to live in close proximity to their work place and are quite prepared to commute routinely if possible. Naturally access to regular and reliable public transport is an important factor in the equation as well as frequent traffic congestion for private vehicles but the option of having a satellite parking site and a site to site company busing scheme could alleviate problems for the long term plans to reduce traffic flows.

Newton with Clifton Parish Council stated that infrastructure enhancements are already required locally and in the wider Fylde area. They go on to list an extensive range of existing infrastructure and services which they consider will be placed under unacceptable pressure because of the LPA's housing proposals.

CPRE - Fylde District commented on the need to reference provision of a park-and-ride scheme for Kirkham and Wesham station under RPO Local Plan Strategic Objective 3. They go on to state that the previous 2013 draft of the Infrastructure Delivery Plan (Reference 5) gave details of the scheme being considered, including a scheme layout. (2.35/2.36). The scheme would remove the disused northern by-pass line, the site being wholly within Northern Rail's ownership. However, we are concerned that consideration of a scheme has been 'watered down' in the updated Infrastructure Delivery Plan (Reference 6).

The Canal and River Trust (formerly British Waterways) commented that reference to British Waterways within the IDP should be amended to The Canal and River Trust (formerly British Waterways) which replaced British Waterways in England and Wales in 2012.

The Lytham St Annes Cycle Group wished to be recognised as a designated partner with regard to specific cycling proposals (and any other proposals with a potential cycling related dimension).

Lytham St Annes Civic Society have stated that the M55 to Heyhouses Link Road is badly needed.

Newton Residents Association and several individual residents have submitted the same comments relating to school places and health and social services. It is noted that paragraphs 6.18 and 6.29 acknowledges that two primary schools in the Treales area are close to capacity; and that other schools in Kirkham are over capacity. Given the amount of development proposed, concern is raised as the demands on schooling could not be met with expansion of the local primary schools capability and capacity. Expansion of the Newton Bluecoat primary school would further exacerbate the traffic congestion and parking problems already experienced during school drop off and pick up times. 7.18 is noted as stating that Primary Care Centre provision in Kirkham has not been future proofed. These services are inadequate to meet need, let alone any further development in Newton (strategic or not).

A number of residents referred to infrastructure and services in Warton and Kirkham which they have concerns about. The IDP is lacking information about infrastructure which will be placed under pressure including doctors, dentists, pharmacy, primary schools and car parking.

Council response

The council agrees to amend the IDP to take account of the Environment Agency's comments, thereby reflecting the most up-to-date position. This will include amendments to the following paragraphs as set-out below: **3.51, 3.52, 3.53, 3.58, 3.64** and **3.77**.

Highways England's comments are addressed under RPO Local Plan policy **H1** in Chapter 10 and policy **T3** in Chapter 12.

The council notes Historic England's and Lytham St Annes Civic Society's comments.

Relevant to Sport England's comments, the Draft Infrastructure Delivery Schedule does not provide a definitive or exhaustive list of available funding sources and infrastructure costs. It has been prepared to support the development of a CIL Charging Schedule and focuses only on the infrastructure that might use CIL funding. It will be used to develop a draft Regulation 123 List which sets out infrastructure projects that the council intends to fund in whole or in part from CIL. Subsequent to the findings and recommendations of the new Playing Pitch Strategy, the updated Open Space Study and the Facilities Review, it will be possible to identify defined projects for inclusion in the Infrastructure Delivery Schedule.

In response to Sport England's comment 2.a. it is not felt appropriate to state in the IDP that 'Mitigation for loss under Framework paragraph 74 falls OUTSIDE of CIL'. The IDP relates to the provision of new and improved open space. The council considers it more appropriate to amend Local Plan policy **HW3: Provision of Indoor and Outdoor Sports Facilities, criterion 1.b)** in respect of improved alternative provision; which is dealt with under policy **HW3** in Chapter 11.

In response to Sport England's comment 2.b. the continuation of Planning Obligations through Section 106 agreements alongside CIL is addressed in paragraph **1.22(2)** of the IDP. For the purposes of clarity the council will amend paragraph **11.3** of the IDP to make it clear that S106 agreements need not only relate to on-site provision of infrastructure. This principle applies to all infrastructure, not just sports facilities. Furthermore, Local Plan Policy INF 2 Developer Contributions, criterion e) will be amended to include specific reference to indoor and outdoor sports facilities, which is dealt with in Chapter 12.

Natural England's specific examples referencing paragraphs **6.18, 7.2, 7.24** and **7.25 of the Local Plan** are addressed in the relevant sections of the Responses Report.

The council confirms that United Utilities have been consulted as part of the plan making process. A further approach will be made to United Utilities to request detailed modelling work - to assess the ability of wastewater from planned new development to be treated and ensure there is infrastructure capacity to do so. This modelling work will hopefully address

the uncertainties raised in terms of how much growth impacts on what sewerage system; and specifically what improvements are needed.

The number of additional school places needed will be confirmed with Lancashire County Council based upon the most up to date position. In so doing, specific attention will be drawn to comments made by Lytham St Annes Technology and Performing Arts College. In the interim the council will amend the IDP to take account of Lancashire County Council's comments as referenced above. This will include amendments to the following paragraphs as set-out below: **2.2, 2.14, 2.44, 4.1 - 4.5 inclusive, 6.7, 6.9, 6.17, 6.23, 6.28, Tables 3 and 4 and Appendix 2.**

The council will amend the IDP to take account of Blackpool Council's comments, thereby reflecting the most up-to-date position, as advised. This will include amendments to the following paragraphs:

- **2.18** in respect of subsidies to bus services.
- **6.31** with regard to provision of cross-boundary educational issues that may arise from development at the Fylde-Blackpool Periphery.
- **7.9** to refer to the inclusion of a Class D1 Health Centre at Whyndyke Farm. Reference is already made to this in paragraph **7.26 of the RPO** in respect of the outline planning permission for the mixed use scheme which amongst other things includes 1,310 homes in Fylde.

Strategic Objective 3 in Chapter 4 of the RPO version of the Local Plan will be amended to reflect CPRE - Fylde District's comments in that part of the Local Plan. The council has contacted colleagues in public transport at Lancashire County Council and Network Rail so as to confirm the certainty of the Park and Ride scheme for Kirkham and Wesham station. If this scheme is to be delivered within the lifetime of the Local Plan (up to 2032) ideally the council needs to be in a position to include the specifics of the scheme and identify the site boundary on the **Policies Map**.

The council will amend all references to British Waterways in the Local Plan so that it reads: 'Canal and River Trust'.

It is not possible to recognise the Lytham St Annes Cycle Group as a designated partner. They are an end-user rather than a delivery agency. They will however be consulted on all relevant future projects and schemes.

The council does not consider it appropriate to refer to the specific commitment to create green routes for Warton in the **Appendix 2** table. It is suggested that paragraph **2.57** is amended so as to refer to the Lancashire Rights of Way Improvement Plan. The Fylde Coast Highways and Transport Masterplan contains details relating to two projects, namely the Fylde Coast Cycle Network; and the Public Rights of Way creation and enhancement. Both of these projects are included in the table in **Appendix 2**. Lancashire County Council are

currently preparing a 10 year Lancashire Cycling and Walking Investment Strategy. Bryning with Warton Parish Council's suggestion regarding green routes for Warton has been forwarded to Lancashire County Council for possible scheme identification as part of that.

It is understood that the project team responsible for implementing the Preston Western Distributor Road undertook detailed traffic modelling work as part of its planning and design. This would have considered possible congestion issues on the local highway network.

In respect of paragraph **2.15**, Lancashire County Council has been actively engaged throughout the plan making process. They are a formal partner under the Duty to Co-operate and have been consulted both informally and formally in developing policy. This relationship is set to continue.

The council notes Bryning with Warton Parish Council's support for paragraph **7.53** of the Local Plan. The comment about the provision of immediate local housing is noted.

Newton with Clifton Parish Council, Newton Residents Association's and Warton residents' comments are noted and it is intended that the Publication Version IDP will address the impact upon infrastructure and services associated with proposed development. It will not necessarily seek to make good existing deficiencies in their own right.

Recommendations for change

- Amend paragraph **2.2** in the IDP to read: 'In July 2015, LCC has also adopted prepared the draft Fylde Coast Highways and Transport Masterplan, which had been was issued for consultation in January and February 2015.'
- Amend paragraph **2.14** in the IDP to read: '~~Further work is planned at junction 1 of the M55 at Broughton, Preston to overcome traffic congestion at peak times, in addition to the improvement works which took place in 2013.~~ Works at Junction 32 of the M6, have improved the northbound link between the M6 and the M55, by forming a 5 lane motorway over a limited stretch of the road. Highways England has confirmed that significant development in the vicinity of Junction 4 of the M55 (i.e. the Fylde-Blackpool Strategic Location for Development) would not have a major significant impact on Junction 1 at Broughton.'
- Amend 2nd sentence of paragraph **2.15** to read: '...will continue to work...'
- Delete the existing text in paragraph **2.18** and replace with the following: 'Bus routes are generally provided by commercial operators who determine the route and frequency of services. As Fylde is predominantly a rural borough with a relatively low population, bus services are often infrequent and some areas are not served by public transport. LCC has formally advised the bus operators that the bus service subsidies will cease on 2 April 2016. These local bus services are registered with the North Western Traffic Commissioner. It will be for the operator to either deregister the services with the Traffic Commissioner after 2 April 2016 or determine whether they could continue to provide some service in the area, without any level of subsidy'

from Lancashire County Council. LCC has asked operators if they could confirm their intentions as soon as possible on this matter. When information about potential service coverage is known, LCC will forward details of those services, whole or sections, which LCC are anticipating not to be provided, to other operators to establish if there are alternative commercial opportunities to maintain some level of service in an area. Following these discussions with bus operators, LCC would then be in a position to advise residents where conventional bus services would no longer operate and what, if any, mitigating action that can be taken to access or develop any potential Parish or Community Bus or Community Transport based transport schemes.'

- Amend the opening words of paragraph **2.44** in the IDP to read: 'Blackpool Airport and its associated Enterprise Zone ...'
- Amend the third sentence paragraph **2.57** to read: '...Fylde, as identified in the Lancashire Rights of Way Improvement Plan, especially...'
- Amend paragraph **3.51** in the IDP to read: 'Whilst bathing water quality on the Fylde Coast has improved significantly over the past 20 years, in 2010 and 2011 the quality has started to decline. None of the bathing waters meet the forthcoming revised Bathing Water Directive standards. However, United Utilities completed the Preston Tunnels scheme in February 2014, improving unsatisfactory intermittent discharges within the Ribble Estuary. As a result, an evidence case was approved to assess St Annes and St Annes North bathing waters on bathing water quality data collected since the improvements. The case was accepted. In 2014 both bathing waters met and exceeded the minimum Bathing Water Directive standards achieving a classification of Good. In 2015 this was maintained at St Annes, with St Annes North achieving Excellent.'
- Amend paragraph **3.52** in the IDP to read: 'In 2015 a revision to the The revised Bathing Water Directive came into force. It introduced higher standards for bathing water quality, and has a requirement for public information about water quality to be available at all bathing waters. introduces higher standards, and has a requirement for public information about water quality to be available at all bathing waters. If bathing waters do not meet the stricter Directive standards, there is a requirement to erect signs advising of the quality of the bathing waters. This could have detrimental impacts upon local tourism and the economy.'
- Amend the opening sentence of paragraph **3.53** in the IDP to read: 'There are many contributors towards the decline in bathing water quality. Bathing water quality can be impacted by contributors.'
- Amend the penultimate sentence in paragraph **3.58** in the IDP to read: 'An AMP6 project at Clifton Marsh WwTW will ensure that the WwTW is adequately sized is currently adequately sized for the potential future development that could occur in Fylde Council and Preston City Council.'
- Amend paragraph **3.64** in the IDP to read: 'To inform the business case for the next United Utilities is now progressing Asset Management Plan (AMP6). UU is

~~assembling information to submit to Ofwat by identifying future supply and demand needs across the North West in relation to water supply and wastewater.’~~

- Amend paragraph **3.77** to read: The council will continue to provide input into the Fylde Peninsula Water Management ~~Group and the Making Space for Water Group Partnership~~ as the Local Plan progresses, and will utilise the partnership groups to ensure that the Local Plan deals with surface water flooding and bathing waters issues effectively.
- Delete paragraphs **4.1** to **4.4** inclusive. Amend existing paragraph **4.5** in the IDP to read: ‘Thornton Waste Recovery Park, in Wyre, treats 225,000 tonnes of household waste each year from the three Fylde Coast Authorities administrative areas and other parts of Lancashire. The Waste Recovery Park processes all waste indoors, making it the UK’s first fully enclosed waste treatment facility. Liaison with LCC indicates that the proposed ~~level of~~ quantum and distribution of ~~growth~~ development identified in the ~~Revised Preferred Option Publication~~ version of the Local Plan does not raise any significant waste capacity issues, and the facilities at the Thornton Waste Recovery Park have sufficient capacity to deal with this scale of development. There will continue to be a demand for waste management capacity from existing industries and businesses in Fylde and any expansion or growth in industries promoted by the draft Local Plan will add to this demand. However, any waste infrastructure required as a result of the development of the Fylde Local Plan is more properly addressed through the Minerals and Waste Local Plan, a review of which is ongoing and will involve discussions with Fylde under the duty to co-operate.’
- Amend the last sentence of paragraph **6.7** in the IDP to read: ‘that ~~the development is viable~~ necessary and appropriate education provision is made and the development is sustainable.’
- Add the following sentence to the end of paragraph **6.9** in the IDP: ‘Developers should obtain an accurate housing assessment which will identify the need for school places.’
- Amend paragraph **6.17** in the IDP to read: ‘LCC has taken steps to provide additional places at three primary schools in Lytham St. Annes in the last few years to address an increase in the demand for primary school places created by an increased birth rate and new housing development. The provision of additional primary school places are prioritised in Lancashire's Strategy for the Provision of School Places and Schools Capital Investment. In relation to primary schools, LCC’s preference is to expand existing schools, where they are physically capable of being extended. There will also be demand for an additional secondary school in the borough within the lifetime of the Plan and a site for a new secondary school will need to be identified. From the information in the housing trajectory in **Appendix 2** of the Local Plan, the development sites could bring forward the need for 6 ½ additional primary forms of entry and approximately 787 secondary school places over the lifetime of the plan. Given the scale of development, the need to assess the feasibility of existing sites for expansion and the fact that a 1 form of entry primary site has been included within the Section 106 Agreement for the Queensway development at St Annes, there may be a need to identify additional primary school sites. Because no one development is likely to be of a scale to produce sufficient secondary yield for a new secondary

school, there is a need for Fylde Council to take a strategic decision on the provision of an additional secondary school site which will be required over the timescale of the Local Plan.'

- Amend **Table 3: Surplus Primary School Places** and **Table 4: Surplus Secondary School Places**, by updating the January 2013 with data from May 2015.
- Amend the last sentence of paragraph **6.23** in the IDP to read: 'LCC is working with Fylde Council to ensure that ~~an appropriate site for~~ sufficient a new secondary school places are is provided ~~within~~ throughout the plan period.'
- Add the following sentence at the end of paragraph **6.28** in the IDP: 'The current adopted Fylde Local Plan lists a requirement for a primary school site off Mowbreck Lane, for the possible relocation of the CE Primary School on Garstang Road North, in Wesham. Currently this site should remain within the Local Plan.'
- Amend the first sentence of paragraph **6.31** in the IDP to read: 'The council will work with LCC and Blackpool Council to determine in more detail whether existing school provision would meet the education impact from the developments proposed in the ~~Revised Preferred Option~~ Publication version of the Local Plan.'
- Add the following after the second sentence of paragraph **7.9**: Outline planning permission has been granted for 1,310 homes at Whyndyke Farm. The mixed use development also includes the provision of a new health centre. Once the health centre is delivered, residents in the Fylde-Blackpool Periphery will be able to attend the doctors' surgeries at Whyndyke Farm.
- Subsequent to the findings and recommendations of the new Playing Pitch Strategy, the updated Open Space Study and the Facilities Review: Update the IDP paragraphs **9.2 - 9.10** and the associated Infrastructure Delivery Schedule / developing Regulation 123 List.
- Amend the first sentence of paragraph **11.3** to read 'Both off-site and ~~o~~On-site...'
- Amend the first entry in **Appendix 1 – Green Infrastructure – Green Corridors Table** to read '...~~British Waterways~~The Canal and River Trust...'
- Amend **Appendix 2 – Infrastructure Delivery Schedule** by updating the highway schemes to reflect the correct colour scheme in the key: – dark orange, orange or yellow – denoting 'Committed capital programmes, or those that are secure or ongoing developments; uncertain capital available, or uncertain timescales; or projects that have had funding removed, but are still required, or are longer term aspirations.'

Additional recommendations for change

The following additional changes are proposed to update and amend the text so as to ensure that the Infrastructure Delivery Plan (the IDP) is up-to-date, robust and fit for purpose and in

response to recommendations made by Arcadis (formerly Hyder Consultants) in the Sustainability Appraisal.

Additional textual changes

- Amend the title of the document to read: ‘The Infrastructure Delivery Plan (IDP) accompanying the Publication version of the Local Plan’
- Amend text in paragraph **1.2** in the IDP to read: ‘a minimum of 7,770 new homes between 2011 and 2032’ and replace the word ‘growth’ with ‘development’ in this paragraph and throughout the Infrastructure Delivery Plan.
- Amend text in the first sentence in paragraph **1.2** in the IDP to read: ‘so as to enable the level of growth quantum and distribution of development ...’ and repeat this throughout the IDP.
- Amend paragraph **1.19** in the IDP to include the following text: ‘the ~~Revised Preferred Option~~ Publication version of the Local Plan ...’
- Amend paragraph **1.20** in the IDP to include the following text: ‘~~and a~~ A Facilities Review was will also be undertaken by Lancashire Sport Partnership in August 2015...’
- Amend the opening sentences of paragraph **1.21** in the IDP to read: ‘~~It is anticipated that the~~ The council will begin has commenced the development of a CIL after alongside consultation on the Revised Preferred Option version of the Local Plan. The preliminary draft charging schedule is currently out for consultation alongside the Publication version. The CIL will comprise an adopted charging schedule and a Regulation 123 List of infrastructure projects ~~or areas.~~’
- Amend paragraph **1.24** in the IDP to read: ‘Information received from infrastructure and service providers during this consultation into the draft IDP will ensure that is up-to-date and robust ~~before~~ prior to the EiP into the Local Plan, which is scheduled to take place in January 2017.’
- Move text on ‘M55 (Junction 3) to Norcross Link Road (The Blue Route)’ up to paragraph **2.6** in the IDP and move the text on the ‘A585 Skippool – Windy Harbour Improvements’ to follow it. Amend the sub-heading before paragraph **2.6** to read: M55 (Junction 3) to Fleetwood Corridor Improvements ~~Norcross Link Road~~. The new paragraph **2.6** should read: ‘There is significant traffic congestion on the A585(T) at peak times, and development proposed in the emerging Wyre Local Plan and Wyre’s adopted Fleetwood-Thornton Area Action plan will place additional pressure on this route. There is a long standing proposal to build a dual carriageway road to connect a new junction on the M55 east of Peel Hill to the Victoria Road roundabout on the A585(T) between Thornton and Cleveleys. This scheme, formerly known as the The proposed ‘blue route’ (M55 Junction 3 – Norcross Link Road) would alleviate this traffic congestion and would improve north-south road links north of the M55 and enhance accessibility to and from Fleetwood. Fleetwood is still

~~officially classified as a port and has commercial sailings linked to the offshore energy sector. The route is not presently shown as being safeguarded in an adopted Development Plan. The A585 Corridor Study will look at the scale and scope of the problems on the A585(T) and set out how they could develop over the next ten years or so.~~

- Existing paragraph **2.8** should become paragraph **2.7** in the IDP and read: ‘The southern section, which lies within Fylde, comprises the A586 Garstang Road East to M55 between Junctions 3 and 4. This section would comprise a new junction on the M55 to the east of Junction 4 at Peel Hill and a new 7.5km dual carriageway link to the A586 Garstang Road East to the west of Little Singleton. The funding for the Blue Route is uncertain. The cost is estimated to be around £150 million at 2012 prices but this could rise to £200 million, taking account of inflation. If the blue route was to go ahead, funding could not be obtained within the lifetime of the Fylde Local Plan. Nevertheless, the Local Plan should show the route as a protected line, at least until the Multi-Modal Study presents its findings. The County Council is undertaking a specific North Fylde Coast Connectivity Study which is looking at the scale and scope of the problems on the A585(T) and it will look at the wider issues that are intrinsically linked to the operation of the A585(T).’
- Delete the existing text in paragraph **2.18** in the IDP and replace with the following: ‘Bus routes are generally provided by commercial operators who determine the route and frequency of services. As Fylde is predominantly a rural borough with a relatively low population, bus services are often infrequent and some areas are not served by public transport. LCC has formally advised the bus operators that the bus service subsidies will cease on 2 April 2016. These local bus services are registered with the North Western Traffic Commissioner. It will be for the operator to either deregister the services with the Traffic Commissioner after 2 April 2016 or determine whether they could continue to provide some service in the area, without any level of subsidy from Lancashire County Council. LCC has asked operators if they could confirm their intentions as soon as possible on this matter. When information about potential service coverage is known, LCC will forward details of those services, whole or sections, which LCC are anticipating not to be provided, to other operators to establish if there are alternative commercial opportunities to maintain some level of service in an area. Following these discussions with bus operators, LCC would then be in a position to advise residents where conventional bus services would no longer operate and what, if any, mitigating action that can be taken to access or develop any potential Parish or Community Bus or Community Transport based transport schemes.’
- Add the following sentence at the end of paragraph **2.23** in the IDP: ‘Rail accessibility is poor for sites around Junction 4 of the M55.’
- Add the following text at the end of paragraph **2.24** in the IDP: ‘Squires Gate railway station lies within the Blackpool Airport Corridor and is accessible to sites HSS4 and ES5; and the Blackpool tramway can be accessed at nearby Starr Gate.’
- Delete paragraph **2.48** in the IDP and re-number the subsequent paragraphs: ‘A plan for the regeneration of Blackpool Airport is currently being produced which will set

~~out how the airport can best be developed now that it is no longer operating as an international airport.'~~

- Amend existing paragraph **2.49** in the IDP to read: 'The council will work with other agencies ~~seek~~ to ensure that ~~the~~ improvements are made to surface access (public transport) to Blackpool Airport from surrounding areas and other transport nodes. ~~need for a Surface Access Strategy at the Airport is included in the Local Plan.'~~
- Amend the site reference in paragraph **3.21** in the IDP to read: '~~HSS1~~ **MUS4**: Heyhouses Lane, St Annes (MP)'.
- Amend paragraph **3.34** in the IDP to read: 'The completion of ~~the part~~ 98% of the superfast broadband project that covers Fylde is expected in March 2018 ~~2015~~.'
- Amend paragraph **7.3** in the IDP to read: 'GPs in Fylde are mainly located in the Key Service Centres ~~urban settlements~~ of Lytham, St Annes and Kirkham. However, a Primary Care Centre is available at both Freckleton (Local Service Centre) and Ansdell (part of Lytham), which has GP provision. Great Eccleston, just outside the borough boundary in Wyre, also has a health centre with GP provision.'
- Add the following sentence at the end of paragraph **7.9** in the IDP: 'Outline planning permission has been granted for 1,310 homes at Whyndyke Farm, which includes the provision of a new health centre. Once the health centre is delivered, residents in the Fylde-Blackpool Periphery will be able to attend the doctors' surgeries at Whyndyke Farm.'
- Amend the last sentence of paragraph **7.10** in the IDP to read: 'The majority of Warton residents currently use these Primary Care Centres in Freckleton and Lytham.'
- Amend paragraph **9.1** in the IDP to refer to the preparation of a new Playing Pitch Strategy and an update to the Open Space, Sport and Recreation Study in 2016.
- Amend paragraph **9.4** to include references to the premier pitch facilities at Blackpool Road and Park View Playing Fields.
- Delete existing paragraph **9.5** in the IDP and re-number the subsequent paragraphs: '~~The Open Space, Sport and Recreation Study, 2008 provided an update on the playing pitch position of the borough. This shows that the only significant change in demand related to football pitches, for which demand had reduced.~~'
- Amend paragraph **9.7** in the IDP to read: 'It is anticipated that the CIL will be an important funding mechanism for the provision of required pitches and facilities, through the charging schedule and the Regulation 123 list.'
- Amend paragraph **9.10** in the IDP to read: 'According to KKP's analysis of demand, Fylde is significantly under-provided in terms of fitness provision, both in terms of current and future demand. ~~It is anticipated that the CIL will be an important funding mechanism for the provision of required indoor sports facilities.~~ The Facilities

Review, prepared by Lancashire Sport Partnership in August 2015, recommends approximately 113 more Health and Fitness stations, together with the provision of indoor tennis centres in Fylde due to current under-provision. It is anticipated that the CIL will be an important funding mechanism for the provision of required indoor sports facilities.'

- Additional text is to be inserted in paragraph **9.13** about library services and after paragraph **9.14** on Arts, Museums and Performance Venues in Fylde; and in paragraph **9.19** about Lytham Park Cemetery.
- Amend paragraph **9.21** in the IDP to read: 'The council are engaged with LCC to determine what additional childcare and library services are required to support the ~~level of growth~~ quantum and distribution of development set out identified in the ~~Revised Preferred Option~~ Publication version of the Local Plan.'
- Amend the last sentence of paragraph **10.2** in the IDP to read: 'Lowther Gardens, Ashton Gardens, Lytham Green, ~~and~~ the grounds of Lytham Hall and Singleton Hall also provide opportunities for recreation and tourism. It is important that these assets are maintained and enhanced.'
- Amend the first sentence of paragraph **10.2** in the IDP to read: 'The River Wyre and Lancaster Canal also contain important habitats along their lengths ...'
- Add the following three bullet points to the end of paragraph **10.3** in the IDP:
 - 'DCLG Coastal Communities Fund
 - LEP Growth Fund
 - Natural England Coastal Access'
- Amend the last two sentences of paragraph **10.4** in the IDP to read: 'Elsewhere in the borough, the maintenance of parks, recreation grounds and amenity open spaces has been passed over to the town and parish councils, and in these areas contractors carry out work on behalf of the parishes. ~~At Kirkham, the town council employs Fylde Council to carry out grounds maintenance works.'~~
- Amend the first sentence of paragraph **10.5** in the IDP to read: 'Ashton Gardens has ~~recently~~ undergone a major refurbishment and this was funded through a Heritage Lottery Fund grant of £1,436,000, as well as additional funding towards a total project cost of just under £2 million.'
- Amend paragraph **10.8** in the IDP to include read: 'There are deficiencies in the provision of parks and gardens in some parts of the borough. ~~However, the Open Space, Sport and Recreation Study recommends that these deficiencies can be compensated through the provision of one site of at least 60 Ha in size, at a suitable location that is accessible to the whole borough.'~~
- Amend the second sentence of paragraph **10.10** in the IDP to read: 'The ~~7.5 km~~ 18 mile coastal strip from Starr Gate to ~~Freckleton Marshes~~ Savick Brook has been identified by the council as a priority for Green Infrastructure investment.'

- Amend the second sentence of paragraph **10.12** in the IDP to read: ‘The project, which will be completed in 2017, aims to improve the 24 Ha that are classed as a Site of Special Scientific Interest (SSSI), of which 16 Ha is an LNR, by means of.’
 Add the following five objectives: ‘The five objectives of the Fylde Sand Dunes Management Action Plan are:
1. Enhance the nature conservation value of the sand dunes and other natural coastal habitats such as shingle and saltmarsh areas.
2. Increase the area of sand dune and saltmarsh habitats where appropriate
3. Maintain and, where appropriate, enhance sea defences, with natural accretion of sand dune.
4. Promote knowledge, understanding and appreciation of the ecological value of the sand dunes and other natural coastal habitats, and of their key role in coastal flood defence.
5. Enable safe recreational use of the dunes and beach where this does not significantly compromise the nature conservation or flood-defence properties of the dunes and other natural coastal habitats.’
 Add the following two sentences after the five objectives: ‘Natural England has reclassified the SSSI as ‘favourable improving’. Funding for a further 5 years is being sought by the council.’
- Amend the first sentence of paragraph **10.13** in the IDP to read: ‘There is a recognised deficiency of trees and woodlands in the borough. LCC is undertaking a county wide scheme of community woodland creation through the Lancashire Woodland Project over a 20 year period.’
- Amend paragraph **10.14** in the IDP to read: ‘Policy ENV4 of the ~~Revised Preferred Option~~ Publication version of the Local Plan supports opportunities to extend the Public Rights of Way network where this improves access to key Green Infrastructure assets, including areas of Green Belt, ~~and the~~ two proposed Areas of Separation, the Coastal Change Management Areas (formerly Areas of Open Coastline) and the Lancaster Canal towpath. The Lancaster Canal is an under used asset and there is potential to develop this tract of Green Infrastructure (i.e. green and blue space) into a linear tourism and recreation asset.’
- Amend paragraph **10.15** in the IDP to read: ‘Policy T3 facilitates the provision of additional footpaths, cycleways and bridleways where appropriate. LCC is the authority responsible for carrying out public rights of way creation and enhancement. LCC is working with Fylde Council in creating a coastal path from Starr Gate to Savick Brook, in line with recommendations in the Coastal Strategy.’
- Amend the first sentence of paragraph **10.16** in the IDP to read: ‘The updated Open Space, Sport and Recreation Study, 2016 identifies a deficiency of allotments at Lytham, St Annes, Freckleton and Warton.’
- Amend paragraph **10.17** in the IDP to read: ‘The updated Open Space, Sport and Recreation Study, 2016 identifies gaps in the provision of children’s play areas at Lytham (0.04 Ha), Kirkham and Wesham (0.04 Ha) and the rural areas (0.12 Ha). The study recommends new provision in these areas. The delivery of new homes in the four Strategic Locations for Development will result in the provision of additional children’s play areas on-site serving new and existing communities in Lytham and at

Queensway in St Annes, Kirkham and Wesham and Warton; and new communities in Whyndyke and Whitehills in the Fylde-Blackpool Periphery.

- Amend paragraph **10.18** in the IDP to read: ‘The council ~~is currently~~ has updated ~~updating~~ the Open Space, Sport and Recreation Study, in time for the EiP. The Study ~~is will~~ provides up-to-date evidence of the open space requirements of the borough.’
- Amend **Appendix 2 – Infrastructure Delivery Schedule** by using up-to-date text from the Fylde Coast Highways and Transport Masterplan, the Regeneration Strategy and the Coastal Strategy.

Sustainability Appraisal**Sustainability Appraisal: General Comments**

Number of representations:			
Comment	Support	Object	Total
4	0	2	6

Representations received from:

- Natural England
- Historic England
- Environment Agency
- Blackpool Council
- 2 Developers

What you said

Natural England agreed with the conclusions reached in the SA. The SA clearly outlines both negative and uncertain impacts. Natural England notes there are some unresolved uncertainties in the SA. These negative and uncertain effects should be explored further in the next iteration of the SA as avoidance and/or mitigation measures may be required in order to reduce harm to the environment. As more information becomes available the findings should become more refined.

Historic England had no comments to make on the Sustainability Appraisal or the Habitats Regulations Assessment.

The Environment Agency requested that the last sentence of paragraph 4.2.1 - Water, 1st bullet (page 20) should be updated to include shellfish waters. The Environment Agency suggests: '...including bathing waters and shellfish waters.'

The Environment Agency requested that paragraph 4.2.1 - Water, 5th bullet (page 20) should be revised to reflect the current situation. The Environment Agency suggests: 'Bathing water quality has improved. This is due to the recently completed storm sewage storage scheme in Preston which stores storm sewage in large tanks and then passes this forward for treatment at Preston WwTW after the event. Recent changes in bathing water legislation has resulted in more stringent standards. Poor management and proliferation of non-mains drainage systems, as well as agricultural run-off during rainfall, can have an adverse effect on bathing water quality.'

The Environment Agency commented that - Table 4-2: SA Objectives, Indicators and Targets – 13. (page. 31) - 'To achieve compliance with Bathing Water Directive Guideline Standards' – this comment is now out of date and should be revised. The Environment Agency suggests: 'To

meet the minimum requirements (Sufficient) or better of the Bathing Water Directive at all monitoring points.'

The Environment Agency requested that paragraph 7.2 - Point 2, 6th bullet (page 41) - should be updated to include shellfish waters. The Environment Agency suggests: '...and improving bathing water quality and shellfish waters'

The Environment Agency requested that section Table 9-3: Non-Strategic Sites Sustainability Appraisal Framework and Rationale – 13 (page 71) of the table should include the protection and improvement of shellfish waters.

The Environment Agency requested that section Table 11-1: Outline Monitoring Framework – Protect and enhance the quality of the water environment and reduce the risk of flooding (page 114) of the table should include shellfish waters.

The Environment Agency requested the list of 'indicators... used to ascertain baseline water environment conditions and key trends' should also make reference to shellfish waters in Appendix B – Environmental and Sustainability Baseline (starts page 251 of PDF) Section D. Water Bullet pointed list (page 6).

The Environment Agency requested that paragraph 5 (page 7) should be revised to reflect the current situation. The Environment Agency suggests: 'Bathing water quality is monitored at two European designated bathing waters in Lytham St Annes during the bathing season (1st May to 30th September). The results for the season are compared to the standards set out in the Bathing Water Directive. Recent changes to bathing water legislation has resulted in more stringent standards. In 2014 both bathing waters met and exceeded the minimum Bathing Water Directive standards achieving a classification of Good. In 2015 this was maintained at St Annes, with St Annes North achieving Excellent.'

The Environment Agency requested the paragraph on Key Issues and Opportunities – 5th bullet (page 7) should be revised, as the use of SuDS would be more appropriate to the management of clean surface water rather dealing with non-mains drainage systems. The EA suggests: 'Bathing water quality has improved. This is due to the recently completed storm sewage storage scheme in Preston which stores storm sewage in large tanks and then passes this forward for treatment at Preston WwTW after the event. Poor management and proliferation of non-mains drainage systems, as well as agricultural run-off during rainfall, can have an adverse effect on bathing water quality.'

The Environment Agency requested where 'Fylde Peninsular Waste Water Management Group' is mentioned in the documents provided including Section P. Transboundary Issues – 5th bullet (page 31) should be changed to 'Fylde Peninsula Water Management Partnership' throughout.

Blackpool Council noted that an updated Sustainability Appraisal assessing the implications of the policies proposed had not formed part of the consultation into the RPO version of the Local Plan.

A developer commented that there were serious concerns about the soundness of the plan, in light of the fact that the supporting Sustainability Appraisal was made available part way through the consultation period and fails to properly assess the chosen option.

A developer objected claiming that the sustainability appraisal is not adequate to meet the legislative requirements of the plan making process; the assessment of reasonable alternatives, especially at Warton, is not wide enough and does not assess all reasonable alternatives; and the abdication of Strategic development locations at Warton to the neighbourhood plan fails to meet the SA requirements of this plan making process, and as such is fundamentally flawed. It is inadequate and fails to fulfil the assessment requirements of the regulations, thus making the plan as a whole unsound.

Council response

The council notes Natural England's support for the conclusions reached in the Sustainability Appraisal (SA); and the need to explore the negative and uncertain effects in the next version of the SA as avoidance and/or mitigation measures may be required.

The council notes that Historic England had no comments to make on the Sustainability Appraisal.

The council agrees with the textual changes to the Sustainability Appraisal proposed by the Environment Agency and will forward the proposed changes to the consultants Arcadis (formerly Hyder) who carried out the Sustainability Appraisal into the RPO version of the Local Plan.

The council agrees with Blackpool Council's and a developer's comments that the HRA did not form part of the consultation into the RPO version of the Local Plan from 15th October to 3rd December 2015, but it was issued for consultation for a 6 week period from 23rd November 2015 to 5th January 2016.

The council also notes a developer's comments that the HRA failed to properly assess reasonable alternatives, and deferred the identification of strategic development locations at Warton to the neighbourhood development plan. Following the inspector's decision into the Blackfield End Farm Inquiry, which resulted in additional homes being allowed at Warton, the council has agreed to redraft policy **SL3** in Chapter 7 to include all existing commitments.

Recommendations for change

- The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the Sustainability Appraisal, requesting the need to explore the negative and uncertain effects in the next version of the SA as avoidance and/or mitigation measures may be required.

- The council will forward the textual changes proposed by the Environment Agency to the consultants Arcadis (formerly Hyder Consultants) who carried out the Sustainability Appraisal into the RPO version of the Local Plan, for inclusion in the next iteration of the Sustainability Appraisal.
- Redraft policy **SL3** in Chapter 7 to include the existing commitments in Warton from the start date of the Local Plan.

Habitats Regulations Assessment – Screening Report**Habitats Regulations Assessment: General Comments****Number of representations:**

Comment	Support	Object	Total
4	0	2	6

Representations received from:

- Natural England
- Historic England
- Environment Agency
- Blackpool Council
- 2 Developers

What you said

Natural England advised that further detail should be provided to explain how should impacts be avoided and/or mitigated for at this stage; the plan is not at an early stage as indicated. This will give a higher level of confidence that the areas in question can be redeveloped without resulting in adverse effects on European sites and are therefore deliverable. Whilst Natural England appreciates that the full details of all schemes may not be yet fully known, it would still be beneficial to explore how the predicted effects can be resolved at project stage to provide further certainty that projects will be deliverable at the planning application stage.

Natural England requested further detail on the measures that will be taken to avoid potential impacts as result of the Strategic Locations for Development. The HRA outlines that re-wording of the Policy will be required, however no further detail is provided in the policies in terms of the proposed re-wording. The HRA needs to able to confidently conclude no LSE, not just that potential effects could be resolved through the recommended changes. As much detail needs to be considered as possible at this stage in the plan to ensure the deliverability at project level.

Natural England maintains that the conclusions in the HRA need to be based on a robust detailed assessment. The overall conclusion reached in the HRA is that, assuming appropriate mitigation and compensation measures are implemented at the project level, the Fylde Local Plan is unlikely to have any significant effects on the European sites identified, either alone or in-combination with other plans or projects.

Before Natural England can agree with the conclusions reached, more evidence and explanation is required to support the view that additional policy wording/strengthening outlined are robust enough to ensure that the preferred options are 'unlikely to have any significant effects on the European Sites identified, either alone or in combination with any

other plans and projects. Once more details are known it is likely that changes will occur between the current draft and the next stage prior to submission; the plan should be rescreened with respect to The Conservation of Habitats and Species Regulations 2010. Natural England should be consulted on any amendments that may lead to a likely significant effect(s) on any European Site. It is essential that Natural England's comments are addressed as soon as possible to ensure that the HRA is compliant with the requirements of The Conservation of Habitats and Species Regulations 2010.

Historic England had no comments to make on the Sustainability Appraisal or the Habitats Regulations Assessment.

The Environment Agency commented solely on the Sustainability Appraisal.

Blackpool Council noted that an updated Sustainability Appraisal and the Habitats Regulations Assessment assessing the implications of the policies proposed has not formed part of the consultation into the RPO version of the Local Plan.

A developer commented that there were serious concerns about the soundness of the plan, in light of the fact that the supporting Sustainability Appraisal was made available part way through the consultation period and fails to properly assess the chosen option.

A developer objected claiming that the sustainability appraisal is not adequate to meet the legislative requirements of the plan making process; the assessment of reasonable alternatives, especially at Warton, is not wide enough and does not assess all reasonable alternatives; and the abdication of strategic development locations at Warton to the neighbourhood plan fails to meet the SA requirements of this plan making process, and as such is fundamentally flawed. It is inadequate and fails to fulfil the assessment requirements of the regulations, thus making the plan as a whole unsound.

Council response

The council agrees with Natural England that as much detail needs to be considered as possible at this stage, explaining how impacts should be avoided and/or mitigated, thereby ensuring the Strategic Locations for Development and other allocated sites are deliverable without resulting in significant effects on European protected sites. The council agrees with Natural England that the conclusions in the HRA need to be based on a robust detailed assessment and that more evidence and explanation is required. The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the HRA and request further work is carried out to address Natural England's concerns. Once the additional evidence has been provided by Arcadis and the necessary amendments have been made to the Local Plan - the Publication version – Natural England will be consulted and the plan will be rescreened with respect to The Conservation of Habitats and Species Regulations 2010.

The council notes that Historic England had no comments to make on the HRA.

The council agrees with Blackpool Council's and a developer's comments that the HRA did not form part of the consultation into the RPO version of the Local Plan from 15th October to 3rd December 2015, but it was issued for consultation for a 6 week period from 23rd November 2015 to 5th January 2016.

The council also notes a developer's comments that the HRA failed to properly assess reasonable alternatives, and deferred the identification of strategic development locations at Warton to the neighbourhood plan. Following the inspector's decision into the Blackfield End Farm Inquiry, which resulted in additional homes being allowed at Warton, the council has agreed to redraft policy **SL3** in Chapter 7 to include all of the existing commitments.

Recommendations for change

- The council will notify Arcadis (formerly Hyder Consultants), the consultancy that carried out the HRA requesting the provision of further evidence ensuring allocated sites are deliverable without resulting in significant effects on European protected sites; and to properly assess reasonable alternatives. Once the additional evidence has been provided by Arcadis and the necessary amendments have been made to the Local Plan - the Publication version – Natural England will be consulted and the plan will be rescreened with respect to The Conservation of Habitats and Species Regulations 2010.
- Redraft policy **SL3** in Chapter 7 to include all existing commitments in Warton from the start date of the Local Plan.

Rural Proofing Assessment

Rural Proofing Assessment: General Comments

Number of representations:

Comment	Support	Object	Total
2	0	0	2

Representations received from:

- Campaign to Protect Rural England (CPRE) – Fylde District
- 1 Resident

What you said

CPRE – Fylde District, approve of the Rural Proofing Assessment with its confirmation that at the national, local and neighbourhood level planning policies should not treat greenfield land as an unlimited resource ripe for development. However, the effectiveness of the Rural Proofing Assessment will ultimately depend on whether rural specific developments are assessed as truly sustainable.

One resident commented that the Rural Proofing Assessment, did not appear to be appropriately applied to policy as it required policy makers to ensure that the needs and interests of rural people, communities and businesses are properly considered in the development and implementation of all policies and programmes.

Council response

The council agrees with the CPRE – Fylde District’s statement.

The council disputes the comments made by the resident. The Rural Proofing Assessment has been applied appropriately and the comments made are indirectly linked to the suggested housing number for Elswick, which although falling under the remit of the Rural Proofing Assessment also fall under different factors such as the need to provide 7,770 new homes within the plan period. For further clarity paragraph **7.77** of the RPO version of the Local Plan is to be amended to read: ‘In Elswick, a Neighbourhood Development Plan will allocate a suitable site(s) to provide 50 ~~140~~ homes over the plan period,’

Recommendations for change

- None

Health Impact Assessment

Health Impact Assessment: General Comments:

Number of representations:

Comment	Support	Object	Total
1	0	0	1

Representation received from:

- Treales, Roseacre and Wharles Parish Council

What you said

Treales Roseacre and Wharles Parish Council commented that the Health Impact Assessment (HIA) does not take account of the Lancashire County Council Shale (LCC) Gas HIA, which addresses the health risks associated with Shale Gas development in the Fylde. Some 61 risks were identified unacceptably impacting the health and wellbeing of Fylde communities. If the risks can be practically mitigated, many of the mitigations will require on going enforcement by the local communities and local government officials, which in turn will adversely affect the attractiveness of the area. A number of risks remain outstanding and therefore the proposed Shale Gas development creates an unacceptable impact to public health. These factors should be incorporated within the planning assumptions of the Fylde Local Plan and impacts flowed through the implications of the plans. Logically the attractiveness of the visitor, residential, retirement, leisure, commuter and inward investment in rural and new businesses will be adversely affected in comparison to other areas which are not subject to the matters detailed in the HIA.

Council response

There is no mandatory requirement to undertake a HIA under planning legislation in England and Wales. However, a HIA is a mechanism to ensure health benefits are integral to the planning process, embedding public health across the Fylde Local Plan and raising awareness amongst strategic partners and delivers. The HIA is specific to Fylde and its policies, and whether or not its proposed policies would have a detrimental impact on the health, mental health and wellbeing of the people of Fylde. The impacts of shale gas exploration are still unknown. There are counter arguments for and against shale gas exploration and the industry is in a pre- exploration phase. If a shale gas production industry is developed in Fylde, there will need to be an early review of the Local Plan, details of which would also need to be addressed in an updated HIA.

Recommendations for change

- None

Fylde Local Plan – Economic Viability Assessment**Economic Viability Assessment: General Comments**

Number of representations:			
Comment	Support	Object	Total
2	0	0	2

Representations received from:

- 2 Developers.

What you said

A developer who has current experience of both recent land purchases and homes sales in the Fylde Borough made the following comments:

- *Further clarity is needed on the net and gross land values – what is used.*
- *We do not have experience of recent Greenfield land purchases in the borough, however experiences of bidding for sites would suggest that the figures are on the conservative side.*
- *They are currently developing a site in Fylde and can draw some experience from this:*
 - *The average sales rate achieved on the site are present is lower than those suggested – at c. £175 per sq. foot, at densities of c. 30 homes per net Hectare. Please also note that there will be incentives etc. included within the price.*
 - *In general we support a desired density of between 30-40dph.*
 - *Return on affordable homes – we are supportive of the suggested level of proportional returns on affordable properties.*
 - *Overall we would consider a profit margin of between 15-25% (return on GDV – this is the standard method we use).*
 - *Although initial sales rates have been slow on the site, this is expected to pick up as the site becomes more established to approximately 30 per annum.*
 - *There are a number of the policies that we fundamentally do not support (that raise building standards above those required by building regulations). These do have an impact on the viability and therefore as the local plan progresses it will be important to revisit the viability to make sure it is aligned.*

Another developer provided a detailed and comprehensive submission. They provided specific comments in relation to the following:

- *Residential Development Types, Density and Mix*
- *Land Values*
- *Sales Values*
- *Affordable Housing*
- *Marketing and Disposal Costs*
- *Development Period*
- *Development Margin*
- *Build Costs*
- *S106 Contributions*
- *Contingency*
- *Bank Funding Costs*
- *Instalments Policy*

They commented that the report lacks sufficient detail. They recommend that the residential viability appraisals are revisited to take into account the issues raised above and detailed summaries made available.

Council response

In response to the first developer's comments, the majority of their comments support the assumptions that were made and this is welcomed.

The land values that have been used are applied to the net developable area of the land and details of the value assumptions are provided at table 5.1 of the Economic Viability Assessment.

To inform the council's evidence base it would be helpful if the developer could provide details of the sales that have taken place to date as this information is not yet available on Land Registry. This information would include, property address, house type and floor area, price paid, date of sale and incentives offered. The developer will be approached and this information requested.

In terms of which policies they do not support, it would be helpful to understand what policies are being referred to here. The developer will be approached and clarification sought.

In response to the second developer's comments the council has received a detailed statement from Keppie Massie, the firm of consultants who undertook the Economic Viability Assessment of the Local Plan, with the support of WYG Group. That detailed statement is published alongside the Responses Report: <http://www.fylde.gov.uk/council/planning-policy-local-plan-/local-development-framework/evidence-base/economic-viability-assessment-emerging-fylde-local/> and represents the council response to the developer's representation.

As required, Keppie Massie are happy to provide the background information to the WYG Group construction costs cost assessments and summary appraisals.

Recommendations for change

- Publish a final version of the ‘Economic Viability Assessment of the Revised Preferred Option: Part 1 Report’ on the council’s website.

‘Blackpool to become latest to benefit from an Enterprise Zone and will become a centre of excellence for the energy sector and boost economy.’ Department for Communities and Local Government, James Wharton MP, Gov.uk, 12 November 2015

Appendix A - List of consultees who made representations on the Fylde Local Plan Revised Preferred Option (the RPO)

List of consultees who made representations on the Fylde Local Plan Revised Preferred Option (the RPO)	
Consultee Name	Consultee Number
Home Builders Federation	GCB/BS/08/00325
The National Federation of Gypsy Liaison Groups	GCB/ERNG/11/01343
Lytham St Annes Civic Society	GCB/VB/15/02196
Newton Residents Association	OC/ACT/15/02230
The Trams to Lytham Team	OC/ACT/15/02246
Cassidy and Ashton Group Ltd	OC/AGCN/08/00245
PWA Planning	OC/AGCN/13/01516
Story Homes	OC/AGCN/13/01729
Hallam Land C/O Pegasus Group	OC/AGCN/13/01758
CBRE Planning	OC/AGCN/14/02030
Pickervance	OC/AGCN/15/02173
Hollins Strategic Land LLP	OC/AGCN/15/02235
De Pol Associates Ltd - JB	OC/AGCN/15/02244
NJL Consulting	OC/AGCN/15/02245
Persimmon Homes Lancashire	OC/AGCN/15/02258
Mr & Mrs Eastham	OC/IB/08/00555
Clifton Risk Management	OC/IB/08/00564
Mr Bickerstaff	OC/IB/08/00598
Warton Developments LLP (Mr Heeley)	OC/AGCN/10/01008
Mr Clayden	OC/IB/10/01026
Mr & Mrs Baybutt	OC/IB/10/01028
Helen Harrison	OC/IB/10/01041
Colin Hartley	OC/IB/10/01042
Alan Proctor	OC/IB/10/01043
John Hobday	OC/IB/10/01044
David Chedd	OC/IB/10/01051
Mr & Mrs Robson	OC/IB/10/01052
Peter Hall	OC/IB/10/01053
Ms Stupple	OC/IB/10/01054
Shaun Tinkler-Rose	OC/IB/10/01055
Mrs Tinker-Rose	OC/IB/10/01057
Michael & Kathleen Procter	OC/IB/10/01063
Mr & Mrs Saunders	OC/IB/10/01065
Ms Oldham	OC/IB/10/01066
Mr Schiavi	OC/IB/10/01067
Mr & Mrs Oldham	OC/IB/10/01068
Angela Cragg	OC/IB/10/01070
Miss Clark	OC/IB/10/01071

Appendix 8: Revised Preferred Option 2015: Consultation Responses

Mr Bannister	OC/IB/10/01079
Mr Lydon	OC/IB/10/01081
Mrs Thomas	OC/IB/10/01092
Dr Thompson	OC/IB/10/01098
Mr & Mrs Phillips	OC/IB/10/01099
Mrs Stafford	OC/IB/10/01100
A S & H E Hall	OC/IB/10/01101
Mr & Mrs McDougall	OC/IB/10/01104
Mrs Harrison	OC/IB/10/01119
Roy Gregory	OC/IB/10/01126
Peter & Brenda Moran	OC/IB/10/01127
Mrs Reed	OC/IB/10/01144
Mr & Mrs Tracey	OC/IB/10/01147
William Braithwaite	OC/IB/10/01148
Mr Chabba	OC/IB/10/01160
Mr Tomlinson	OC/IB/11/01337
Philip & Jackie Kendall	OC/IB/12/00385
Mr Cameron	OC/IB/12/00457
Mr Haresceugh	OC/IB/12/00505
Mr Frost	OC/IB/13/01400
Mr & Mrs Greenhalgh	OC/IB/13/01404
Mr Greaves	OC/IB/13/01464
Mr Scott	OC/IB/13/01505
Mrs McDowall	OC/IB/13/01660
Mr Leadbeater	OC/IB/13/01701
Mr P Moyes	OC/IB/13/01738
Blackpool, Fylde and Wyre Trades Union Council	OC/IB/13/01740
Mr K A Wright	OC/IB/13/01741
Mrs Frost	OC/IB/13/01769
Community Association for the Protection of Wrea Green	OC/IB/13/02027
Mr & Mrs Kilshaw	OC/IB/15/00152
Miss Tinkler-Rose	OC/IB/15/00216
Miss Tinkler-Rose	OC/IB/15/00383
B Dodd	OC/IB/15/00386
Lynn Telford	OC/IB/15/00517
Mrs Cross	OC/IB/15/00537
Mr Marshall	OC/IB/15/00593
Mr. Fairbans	OC/IB/15/00614
Mrs Richardson	OC/IB/15/00769
Mr Bebbington	OC/IB/15/00776
R & E Hardman	OC/IB/15/01088
Miss Bebbington	OC/IB/15/01108
Mr. Bebbington	OC/IB/15/01232
Mrs Rowe	OC/IB/15/01250

Appendix 8: Revised Preferred Option 2015: Consultation Responses

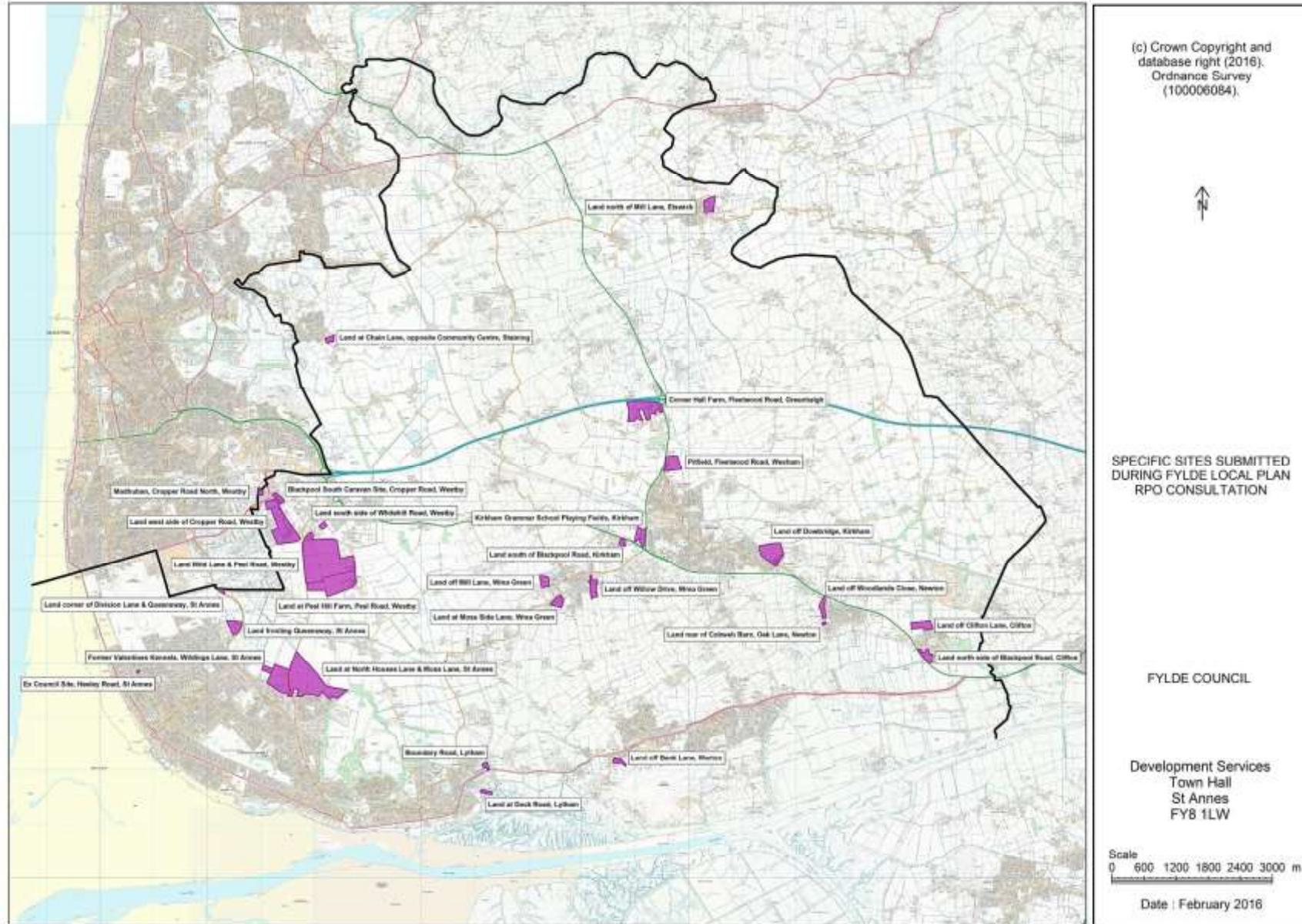
Mr Bebbington	OC/IB/15/01286
Mr Willoughby	OC/IB/15/01325
Mrs King	OC/IB/15/01326
Margaret Cookson	OC/IB/15/02072
Ms Hartley	OC/IB/15/02075
Mr Park	OC/IB/15/02137
Mr & Mrs I Robson	OC/IB/15/02142
Mr Jackson	OC/IB/15/02148
Mr Simco	OC/IB/15/02149
David Francis	OC/IB/15/02150
Mr Galvin	OC/IB/15/02151
Dr Flath	OC/IB/15/02152
Ms Boxall	OC/IB/15/02153
Mr Scullion	OC/IB/15/02154
Ms Galvin	OC/IB/15/02155
Mrs Francis	OC/IB/15/02156
Ms Fenton	OC/IB/15/02157
Mr & Mrs McFarlane	OC/IB/15/02158
D & G Hardman	OC/IB/15/02159
Mr & Mrs Clarence	OC/IB/15/02160
Mr & Mrs Ward	OC/IB/15/02161
Mr & Mrs Loftus	OC/IB/15/02162
Mrs Lee	OC/IB/15/02163
R E Gapp	OC/IB/15/02165
Mrs Simonsen	OC/IB/15/02166
Ms Skorczewski	OC/IB/15/02167
Ms Oldham	OC/IB/15/02168
Mr Fenton	OC/IB/15/02169
Ms Braithwaite	OC/IB/15/02171
Ms Parkinson	OC/IB/15/02172
Mr Whaite	OC/IB/15/02174
Miss Whaite	OC/IB/15/02175
G Norman	OC/IB/15/02178
Mr Mahon	OC/IB/15/02193
Mr Calmus	OC/IB/15/02194
Carmen Parkinson	OC/IB/15/02195
Adrian, Susan & Rosanaugh Long	OC/IB/15/02197
Mr King	OC/IB/15/02198
Mr Clayden	OC/IB/15/02199
Mr Hill	OC/IB/15/02200
Mrs PROCTER	OC/IB/15/02201
Mr Fox	OC/IB/15/02202
Ms Linton	OC/IB/15/02203
Mrs Headley	OC/IB/15/02204

Appendix 8: Revised Preferred Option 2015: Consultation Responses

Mr Headley	OC/IB/15/02205
Mr P Headley	OC/IB/15/02206
Mr Headley	OC/IB/15/02207
Philip Langley	OC/IB/15/02209
Dr Baylis	OC/IB/15/02210
Mr Holland	OC/IB/15/02211
Mr Kendall	OC/IB/15/02213
Mr Barbour	OC/IB/15/02214
Mr Astley	OC/IB/15/02215
Mrs L Oades	OC/IB/15/02216
Mr Smith	OC/IB/15/02218
Mr Duckworth	OC/IB/15/02219
Mr Busby	OC/IB/15/02220
Mr McCormick	OC/IB/15/02221
Mr Tomlinson	OC/IB/15/02222
Mr Berry	OC/IB/15/02224
Mr Ingram	OC/IB/15/02225
Mr Guest	OC/IB/15/02226
Mr & Mrs Nulty	OC/IB/15/02229
Margaret Collinge	OC/IB/15/02231
Mr Donnelly	OC/IB/15/02232
National Custom & Self Build Association c/o Foxely Tagg Planning Ltd	OC/IB/15/02233
Mr Whiteside	OC/IB/15/02234
Mrs Stackhouse	OC/IB/15/02236
Mr McAlonan	OC/IB/15/02237
Mr Thompson	OC/IB/15/02238
Mr Carr	OC/IB/15/02239
Martine Hayhurst	OC/IB/15/02252
Annie Thornley	OC/IB/15/02253
Mr Whittle	OC/IB/15/02254
Mrs Bevan	OC/IB/15/02256
E C C Poon	OC/IB/15/02257
Ms Hulme	OC/IB/15/02259
Canal and River Trust (formerly British Waterways)	OC/ISP/08/00692
McTaggart & Michael c/o Colliers International	OC/LO/12/00968
Co-operative Estates	OC/LO/13/01768
J J Bamber	OC/LO/15/00160
Mr Coxon c/o Smith Planning Consultants	OC/LO/15/01209
Steven Abbott Associates	OC/LO/15/01363
Metacre Ltd - De Pol Associates	OC/LO/15/02109
BAE Systems Real Estate Solutions - AA - c/o Cass Associates	OC/LO/15/02112
Ideal Corporate Solutions Ltd - Emery Planning Partnership	OC/LO/15/02116
Caravan Club - c/o Savills Duncan Parr	OC/LO/15/02132
Smith Love Planning Consultants	OC/LO/15/02228

Appendix 8: Revised Preferred Option 2015: Consultation Responses

Steven Abbott Associates	OC/LO/15/02242
De Pol Associates Ltd	OC/LO/15/02243
Wild Lane and Peel Road Landowners c/o Smith Love Planning Consultants	OC/LO/15/02247
Mr James c/o Steven Abbott Associates	OC/LO/15/02248
PWA Planning	OC/LO/15/02249
Fox Planning Consultancy	OC/LO/15/02250
Morris Homes (North) Ltd	OC/LPD/08/00722
Windmill Group of Companies	OC/LPD/08/00725
McCarthy & Stone Retirement Lifestyle Ltd c/o/ The Planning Bureau Ltd	OC/LPD/13/01767
Minerva Developments c/o Sedgewick Associates	OC/LPD/15/02119
Wainhomes Development c/o Emery Planning	OC/LPD/15/02217
Kensington Developments c/o McAteer Associates	OC/LPD/15/02223
Taylor Wimpey UK Ltd c/o Cushman & Wakefield Ltd	OC/LPD/15/02227
Applewaite Ltd c/o Janet Dixon Town Planner	OC/LPD/15/02241
Gilletts (Callington) Ltd c/o Knights Professional Services Ltd	OC/LPD/15/02251
The National Trust	OC/MISC/08/00833
Fylde Borough Council, Building Control Manager	OC/MISC/08/00837
National Farmers Union	OC/NCC/08/00771
Sport England	OC/SC/B/08/00845
Lytham St Annes Cycle Group	OC/SC/B/13/01371
Kirkham Grammar c/o Steven Abbott Associates	OC/SCH/12/00997
Historic England	SCB/GD/15/00080
Blackpool Council, Head of Planning	SCB/LA/08/00388
Wyre Council	SCB/LA/08/00391
Lancashire County Council - Marcus Hudson	SCB/LA/12/00960
Medlar with Wesham Town Council	SCB/PC/08/00403
Kirkham Town Council	SCB/PC/08/00405
Newton with Clifton Parish Council	SCB/PC/08/00406
Elswick Parish Council	SCB/PC/08/00408
Greenhalgh with Thistleton Parish Council	SCB/PC/08/00409
Treales Roseacre & Wharles Parish Council	SCB/PC/08/00412
Bryning with Warton Parish Council	SCB/PC/08/00416
Natural England	SCB/SCB/08/00343
Highways England	SCB/SCB/08/00347
Environment Agency	SCB/SCB/08/00351
United Utilities North West	SCB/SCB/08/00355
CPRE - Fylde District	SCB/SCB/08/00363
Marine Management	SCB/SCB/14/02044



Appendix 9

Bodies Consulted Under Regulation 18

List of bodies consulted under Regulation 18

The list below shows the bodies to whom the formal letter was sent on 17th May 2011 inviting representations on what the local plan ought to contain. This list therefore represents that prescribed under Regulation 18 (2) of the 2012 Regulations, although the consultation at the time was undertaken under Regulation 25 of the 2004 Regulations, it fulfils the present requirements under Regulation 18 (1).

Name	Organisation
Mrs Andrea Galbraith	Wesham Action Group
Jane Williams	Wyre-Fylde TSSP
Carol Anyon	
Dave Rowe	Wesham Action Group
J A Dempsey	Cornheath Estates Ltd
Mr Owens	NJL Consulting
Mr P Hamilton	Cass Associates
Chris Betteridge	Edmund Kirby
Mr Stock	Drivas Jonas
Hayley Knight	GL Hearn
Mr Graham	Halcrow Group
Mr Alderson	Lambert Smith Hampton
Mr K Oyston	Oystons Estates Ltd
Mr Tweedale	Tweedale
Rachel Whaley	HLL Humberts Leisure
	Robert Pinkus and Co
Miss Delooze	Leith Planning Ltd
Mr Short	The Emerson Group
Mr Booth	Dickens Property Group
Mr J Bromley	Bromley Parker Architects
Mr Hart	Anthony Hart Design Ltd
Mr Ansell	Richard Ansell Ltd
Mr Thompson	DPT
Mr Mackeith	Mackeith Dickinson and Partners
Ms Oram	Mellor Architects
Mr Bryze	Fylde Architects and Surveyors
Miss Williams	Indigo Planning Ltd
Mr Forshaw	Atisreal UK
Mr Frost	Jones Lang LaSalle
Mr Smith	MCK Partnership Ltd
Mr Tye	Paul Butler associates
Mr Harrington	Frank Harrington Associates
Mr Brook	Brookland Developments
Mr Norris	Lambert Smith Hampton
Ms Bowyer	DPDS Consulting Group
Mr Hagen	Taylor Young
Mr Williams	Alderney Estates Ltd
Mr Lord	Dreweatt Neale
Mr Worcester	Robert Turley Associates
	Satnam Planning Services Ltd
Mr Robinson	Planning Problems Solved

Name	Organisation
Mr Clark	Clark Planning Consultants Ltd
Mr Sedgwick	Sedgwick Associates
Mr Ryan	Turley Associates
Richard Critchley	GVA Grimley
Mr Cassidy	Cassidy and Ashton
Mr Hicks	Thew and Kendal
Mrs Vanner	Mason Gillibrand
	Carrington Design
Mr C McDonald	Stephen Abbott Associates
	Brockhurst Associates
	CFM Consultants Ltd
	Plans N Design
	Heyes & Co
Mr Alexis De Pol	De Pol Associates Ltd
	Norwest Estates
	Michael Rayner Associates
Mr C N Sinkinson	Homeplan Designs
Mr R V Hopper	
	Thomas Associates
	Aedas Architects Ltd
Stephen A Fish	Fish Associates Ltd
Mr Michael Goode	Croft Goode Partnership
Mr Smith	MCK Partnership Ltd
	Insignia Richard Ellis
Mr Lane	CB Richard Ellis
	J10 Planning
	Barden Planning Consultants
Mr Atkinson	Bill Atkinson Associates
	RPS Chapman Warren
	Bolton Emery Partnership
	Roger Tym & Partners
	Sigma Planning Services
Ms Probert	Taylor Young Urban Design
Ms Beale	Terence O'Rourke PLC
	Tony Thorpe Associates
	Denton Wilde Sapte
	Graham Anthony Associates
	Jones Lange La Selle
	Planning and Design
Mr Padfield	Town Planning Consultancy
	Mellor Architects
	Storeys SSP
Mr Joyce	NTJ Design
Mr Parker	
Mr Fearnall	Strutt and Parker
	Gough Planning Services
Alexander Bateman	The Planning Bureau Ltd
	Cliff Walsingham and Company

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
	Charles Topham and Sons
Mr Turner	Jones Day
David Walton	Walton & Co
Mr Burningham	Broadway Malyan Architects
Angela Mealing	Higham & Co
Mr Shapiro	Taylor Woodrow Developments Ltd
Mr Walker	Peacock and Smith
Hayley Knight	GL Hearn
Mr Armstrong	Mosaic Town Planning
Mr Preece	Bell Ingram Pipelines Ltd
Ms Patterson	Dev Plan Uk
Ms Smith	Paul Butler Associates
Mr Etchews	W M Morrison Supermarkets
Lauren Ashworth	HOW Planning
Ms Ross	Stewart Ross Associates
Jonathan Parsons	JMP Consulting
Mr Jones	Sanderson Weatherall
Ms Pierce	Royal Mail Property Group
Mr Pyrah	Scott Brownrigg
Mr Wildman	Fushion Online Ltd
Mr Middleton	Charles F Jones & Sons LLP
Mr Sandwith	King Sturge LLP
Mr Lathome	RPS Group
Mr Chapman	The Emerson Group
Mr Butt	Planning Bureau Ltd
Mr Lieberman	Pegasus Planning Group
Mr Claxton	Indigo Planning Ltd
Adam Pyrke	Colliers CRE
Mr Tonge	Steven Abbott Associates LLP
	Frank Knight LLP
John Jackson	Persimmon Homes Lancashire
Christopher Hull	Persimmon Homes (York)
Justin Cove	BNP Paribas Real Estate
Mr Oliver	Envirolink North West
Mr Evans	CA Planning
Jenny Hope	GVA Grimley
Chris Garner	Garner Planning Associates
Marc Hourigan	Hourigan Connolly
Mr Forshaw	Northern Trust Company Ltd
Nigel Pugsley	BNP Paribas Real Estate
Mr Donnelly	Pennine Planning
Mr Cooper	Hollins Strategic Land
Simon Artiss	Bellway Homes Ltd
Dan Mitchell	Barton Willmore
Mr Earls	Halcrow Business Consulting
Steve Meredith	Greenhurst Investments LLP
Ms Ross	DevPlan
Mr Wyatt	JWPC Ltd

Name	Organisation
Paul Leeming	Carter Jonas LLP
Alban Cassidy	CA Planning
Mr Williamson	Condy and Lofthouse Architects Ltd
Chris Hewitt	Hewitt Kelly Architects
Mr Cuddy	Michael Cuddy Chartered Surveyors
Richard Wilshaw	DPP LLP
Mr Relph	Sedgwick Associates
	WYG Planning and Design
Mr Booth	JWPC
Mr Gaskell	DPP LLP
John Maccallum	Bell Ingram Design Ltd
Mr Speight	Graterest Ltd
Mr Chapman	Chapman Building Contractors
Mr Nichol	JG Builders
Mr Harrison	Paul Harrison Construction Ltd
Mr Rowe	Rowe Bros Ltd
	Business Link N & W Lancashire Ltd
James Stevens	Home Builders Federation
Mr Sumner	St Annes Chamber of Trade
Mr P Rollings	HALSA
Mr W Ackroyd	Lytham & Ansdell Chamber of Trade
Mr Scarborough	N & W Lancashire Chamber of Commerce
Mr Howsley	Construction Industry Training Board
	Education Business Partnership Ltd
	Federation of Small Businesses
Mr Smith	Groundwork Business Environment Association
Mr Walton	Lancashire Job Centre Plus
Mr Swarbreck	Lancashire Economic Partnership
Mr Goulden	The Age and Employment Network
Mr Young	Myerscough College
Cllr Aitken	
Cllr Ackers	
Cllr Akeroyd	
Cllr Ashton	
Cllr Beckett	
Cllr Buckley	
Cllr Chedd	
Cllr Chew	
Cllr Collins	
Cllr Davies	
Cllr Eastham	
Cllr Eaves	
Cllr Fazackerley	
Cllr Fiddler	
Cllr Ford	
Cllr Hardy	
Cllr Harper	
Cllr Hayhurst	

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
Cllr Henshaw	
Cllr Hopwood	
Cllr Jacques	
Cllr Little	
Cllr Mulholland	
Cllr Nulty	
Cllr Oades	
Cllr Pounder	
Cllr Prestwich	
Cllr Rigby	
Cllr Silverwood	
Cllr Singleton	
Cllr Speak	
Cllr Threlfall	
Cllr Craig-Wilson	
Cllr Woodman	
Cllr Nash	
Cllr Davies	
Cllr Duffy	
Cllr Donaldson	
Cllr Goodrich	
Cllr Willder	
Cllr Wood	
Cllr Armit	
Cllr Hodgson	
Cllr Clayton	
Cllr Cox	
Cllr Andrews	
Cllr Ashton	
Cllr Brickles	
Cllr Cunningham	
Rev Webber	Action for Better Access
Mr Bentham	SAART Organisation
Mr Winkley	Blackpool Fylde & Wyre Soc for the Blind
	Disability Rights Commission
Mr Lamb	Friends of the Earth
Tim Youngs	RSPB
Mr Allen	Groundwork Lancashire West
Mr Renwick	Fair and Local Trade
Mr A Fielding	Save Our Shore Line
Ms Lees	Queensway Environmental Defenders
Mr Ingram	Equality and Human Rights Commission
	National Probation Service
Mr Smith	The Gypsy Council
	The Showmans Guild of Great Britain
	Equality 2025
Mr Mercer	The National Gypsy Traveller Federation
	Preese Hall Farm

Name	Organisation
	Kellamergh Farm
James Tomlinson	Clifton Marsh Farm
T & E Garlick	
J & A & M Braithwaite	
Mr Pennington	Brook Farm
	Bottoms Farm
	Carr Farm
	Warton Hall Farm
Mr S Gregson	
	North Farm
Mr J S England	
J & S Winstanley	
J Eccleston	
D Lund	
P Keyes	Oakfield Farm
R Collinge	
T J Parkinson	
O & H Melling	
B J Tomlinson	
P P Heaton	
Pickles T Farms Ltd	South Farm
D E Pickervance	
J M Stopforth	
	Pleasant View House
A & S M Anderson	Moorside
B W & J Robinson	
E J & E P J Walton	Fox Lane Ends Farm
Mr Hargreaves	Mere Farm
T H Wensley & Son	
J C Gardner	
	Delrosa Farm
G S & S I Bartlett	Peel Hill Farm
	Chicken Farm Company
	Todderstaffe Hall Farm
T Robson	Fairfield Farm
W B Richardson	Manor Farm
J T Smith	
	Bradley Ltd
L Goodier	
Mr Butler	Barn Owl Farm
E Kirby & Sons	
K Rowe	
A & D Russell	Moor Hey Farm
J D Loftus	
Mr Cowell	Pitfield Farm
J Cowell	
J Rowe	
J A Salthouse	

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
J & G Thornley	
	Rose Hill Farm
Hall Bros & Sons	
Henry Cooper & Son	Higham Side Farm
T & J Rogerson	Town Head Farm
M & S Tomlinson	
H & C Pickervance	
H H Knowles	
A O & T O Laycock	
C W Gardner	
G A Carter	
R & J Capstick	
	Carr Farm
P T Critchley	
J R Mason	Hillock Farm
F & M Fare & Son	
G Fenton	
H Wood & Sons	
P Rigby	
W Rogerson & Sons	
R G & J M Towers	
J Penswick & Sons	
J Rowe	
R R Sanderson	
T E & J M Redmayne	
P J A & M J isles	
	Medlar Fruit Farms Ltd
H Hesketh	
Mr D Golden	MPSL Planning & Design Ltd
Mr P Swire	Moorland Motors Ltd
Mr C Carter	Chris Carter Interiors
Mr J Thompson	Thompson Development Ltd
Pete Marquis	Pete Marquis Plant Hire/Skip Hire
Mr D Cox	Cox Motor Group (Blackpool Honda)
Mr D Atkinson	Brichwood Nurseries
Mr J M Storey	H Greaves & Co
Mr P Dennison	Stanways of Lytham
Mr B Chambers	Tye The Knot
Mr Geoff Attwater	Architectural Design Services
Mr S Rhodes	Dream Kitchens
Mr D Pugh	Creative Windows Ltd
Mr A Woodman	Derek Woodman Ltd
Mr B Wolstenholme	Wolstenholme Signs
Mr J Firth	Firth Associates Ltd
Mr J England	D S & C M England
	Abbey National PLC
Mr Aird	Aegon UK Ltd
A D Mottram	Applied Systems Engineering

Name	Organisation
Mr Durcan	Lambert Smith Hampton (AXA UK)
Mr Stott	BAE Systems Warton
	Barclays Bank PLC
Mr Brown	Beaverbrooks the Jewellers
Mr Malloy	Bonds of Elswick
Mr Jackson	Hallam Land Management
Mr Corbett	Chadwick Hotel
Mr Caddy	Clifton Arms Hotel
Mr Tomlinson	Clifton Fields
Mr Evans	Dalmeny Hotel
Mr Miller	Lytham St Annes Express
Mr Dennison	F2 Chemicals
Mr Parkinson	Evening Gazette
Mr Edwards	Greystone Ltd
	Halifax PLC
Mr Morris	Helical Technology Ltd
	HSBC
Mr Kershaw	Hymer UK
Mr Wilson	ITT Pure-Flo Ltd
Mr Snipe	Ian Snipe & Co
Mr Gol	Inenco Group Ltd
Mr Taylor	J R Taylor of St Annes Ltd
Mr Wearing	J Wearing & Sons Ltd
Mr Rollings	Lindum Hotel Ltd
	Lloyds TSB Bank Ltd
Mr Ansell	Manse Nursing Home
	Marsden Building Society
Mr Lord	Natures Aid Ltd
	Oldroyd Publishing Group Ltd
Mr Kay	Maiden Enterprise
Mr Taylor	Carr Royd Leisure
Mr Cottam	Ribby Hall Holiday Village
	Royal Bank of Scotland
	Sainsburys
	Skipton Building Society
Mr Baines	The Smith Group
Dr Christov	St Annes Land & Building Company
Mr P Dennison	Stanways of Lytham
Mr Baptist	Statestrong Ltd
Mr Clarke	J W Stringer Ltd
Mr Pickles	T Pickles Farms Ltd
Mr Croston	The Fernlea Hotel Ltd
P Howart	The Glendower Hotels
Mrs A Holt	
Mr McKellen	The Ormerod Home Trust Ltd
Mr Moore	Thistleton Lodge Ltd
Mr Peters	Universal Products (Lytham) Manufacturing Ltd
Mr Miller	Victrex Ltd

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
Mr Webb	Webb Hotels Ltd
	BNFL Springfields
	Morris Homes Ltd
Mr Hudson	Asda
	Defence Estates
	DEFRA Energy Efficiency Office
Mr Jones	Forestry Commission
Mrs Smith	Government Office for the NW
Mr M Jarvis	HM Prison Service
Dr Wimble	English Heritage
	The Crown Estates Office
	HM Inspector of Health and Safety
	Housing Strategy Manager, GO for the NW
	Home Office
	Attendance Allowance & Disability Living
	Department of Constitutional Affairs
	DCMS, GO for the NW
	Office of Government Commerce
	Director of Education & Cultural Services, LCC
Mr & Mrs Taylor	
Mr Cubbins	
Mr Holland	
	A Cowie & Sons Funfairs
	Heine Planning
Catherine Mugonyi	Blackpool Council
C Delaney	Wyre Council
C Ferguson	Wyre Council
Christine Durber	Lancashire County Council
P Murphy	Wyre Council
D Thow	Wyre Council
G Payne	Wyre Council
Gill Cookson	Education Dept, Lancashire County Council
H White	Irish Societies
Ian Dickinson	Lancashire County Council
	Rural Media
	Travellers Voice
Kate Bailey	Envision
	Irish Traveller.org
Kirk Mulhearn	
	Showmen's Guild
L Turner	Wyre Council
Lisa Young	Lancashire
Mike Gee	
Nicola Hartley	Making Space
P Brown	Salford Council
P Clarke	Wyre Council
Rachel Francis Ingham	
Rachel Stirzaker	

Name	Organisation
	Traveller Education Lancashire CC
Seb Smith	Lancashire CC
Tina Daniels	
Winnie Lawlor	
Mr Burnette	
Mr Clements	Face to Face
Mr Cronin	YMCA Lytham St Annes & Fylde
Mr Andrew	Muir Group PLC
Mr Finn	New Fylde Housing
Mr Harrison	Great Places Housing Group
	Places for People Developments
Mr Perkins	Great Places Housing Group 1
Mr Heath	Face to Face (Paterson Centre)
Mr Taminis	New Fylde Housing
Mr Bradley	New Fylde Housing
Mr Dobson	Richmond Fellowship
Mr McEvoy	Lytham St Annes War Memorial
Mr Bradley	Five Piers Housing Association
Mr Dawson	Social Services
	Lancashire County Council
Mr Nulty	Citizens Advice Bureau
	British Waterways
	Civil Aviation Authority
Mr Rothwell	Health and Safety Executive
	Lancashire Constabulary
Mr Poole	Post Office Property Holdings
Mr Worthington	Telereel Trillium
C Moffat	Royal Property Group
Mr Catty	Land Use Planning
Mr Allan	Blackpool Council Transport Policy
Judith Roberts	Lancashire CC Directorate for Children & Young People
	Head of Planning, Blackpool B C
	Preston City Council
	South Ribble Borough Council
	Wyre Borough Council
	West Lancashire District Council
Peter Iles	Environment Directorate, Lancashire CC
	Chief Executive, Lancashire CC
Mr Worthington	Highway Planning, Lancashire CC
Kate Grimshaw	Property Group, Lancashire County Council
Mr Jepson	Environment Directorate
Mr Burrell	Blackpool Fylde & Wyre Economic Development Co
Mr Camp	Environment Directorate
	North West Development Agency
Mr I T Cropper	Hesketh with Beconsall Parish Council

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
Mr W V McEnnerney-Whittle	Hutton Parish Council
Mrs Mason	Great Ecclestone Parish Council
Mrs L Squires	Hambleton Parish Council
Mr D Porteous	Inskip with Sowerby Parish Council
Mr W V McEnnerney-Whittle	Lea and Cottam Parish Council
Mrs J Buttle	Woodplumpton Parish Council
Mr Shapiro	Taylor Woodrow Developments Ltd
Paul Stock	North Country Homes Group
Robert Taylor	Plot of Gold Ltd
	Crosby Homes (Lancs) Ltd
	Elan Homes Northern Ltd
	Taylor Wimpey UK Ltd
	Bellway PLC
	Berkeley Group PLC
	Crest Nicholson PLC
	CALA Group Ltd
	Fairview New Homes PLC
	Lovell Partnership Ltd
	Gladedale Holdings Ltd
	Bloor Holdings Ltd
	McCarthy & Stone (Developments) Ltd
	Countryside Properties PLC
	Keepmoat PLC
Mr Thompson	Morris Homes (North) Ltd
Mr Whitehead	Windmill Group of Companies
	Chelford Homes Ltd
Mr O'Toole	Fylde Building Services Ltd
Mr Bell	K & B Bell
Mr Dockerty	Newbury Properties
Mr Holden	Edenfield Homes Ltd
	Opening Doors (Fylde) Ltd
	Stonecroft Developments Ltd
	William Eaves & Co Ltd
	Henco International Ltd
	Fylde Developments Ltd
	Westminster Properties (Scotland) Ltd
	Melrose Construction Ltd
	Rowland Homes Ltd
	Hurstwood Developments
	Barratt Homes
Mr Webber	Miller Homes North West
Mr Shenton	Shenton Homes
Mr Liversidge	Kensington Developments Ltd
Ms Aspinall	Countryside Properties (Northern) Ltd
Mr Marsden	Warwick Homes (NW) Ltd
Mr Hill	Newfield Jones Homes
Mr Williams	Miller Homes Yorkshire
Mr O'Reilly	Welbeck Land Ltd

Name	Organisation
Mr Williams	Redwater Homes Ltd
Ian Howarth	Learning & Skills Council
Michele Lee	Princess Street Enterprise Centre
Mr Richards	Blackpool & The Fylde College Enterprise Development
Ms Wolstenholme	Beneast Vocational Training Centre
	University of Central Lancashire
	Freckleton Library
	Kirkham Library
	Lytham Library
	St Annes Central Library
	Ansdell Library
Mr Jackson	Campaign for Real Ale Ltd
Mrs Cartmell	Federation of Lancashire Civic Societies
Mr Platt	Fylde Housing Partnership
Mr Davenport	Fylde Constituency Labour Party
Mr Gillett	Interim Housing Manager Fylde Borough Council
Mr M Clarke	Turley Associates
Mr Foot	Blackpool Borough Council
Mr Loynd	Fylde Low Waste & Energy
PC 893 Denton	Lancashire Constabulary
	Fields in Trust
	Institute of Directors
	Future Energy Solutions
Mark Menzies MP	
	Commission for Architecture & the Built Environment
	CBI
	Arts & Business North West
	Local Strategic Partnership
Mr Ellis	Fylde Bird Club
	Ansdell Business Association
Mr Coupe	Friends of Lytham Hall
Mr Ashton	Lytham Heritage Group
Mr W R Potter	Lytham St Annes Safe Cycling Campaign Group
	Kirkham Local History Society
	Lytham Cricket & Sports Club
	Newton & Freckleton Marsh Owners
Mr Brown	Local Dialogue LLP
Mr Wilkinson	Lancashire/Blackpool Tourist Board
Mr Debicki	Lancashire constabulary
Ian Gurrod	Lancs Fire & Rescue Service
John Marsden	HM Prison Service Kirkham
Mr Ashley	Fylde Real World Group
	Manchester Methodist Housing Group
Mr Mayers	Kirkham Youth Space
Mr Hurst	Lancashire Fire & Rescue

Name	Organisation
	Fylde Young People's Service
Mr Tomlinson	Keep Fylde Farming
Mr Machin	Guardian Angels
Mr Cottam	Housing Manager, Fylde Borough Council
Derek Darwen	Lancashire Constabulary
	William Rainford Holdings Ltd
Mr Moor	Fylde Civic Awareness Group
	The Georgian Group
	Ancient Monument Society
	Council for British Archaeology
	Society for the Protection of Ancient Buildings
	The Victorian Society
	The Twentieth Century Society
	The Garden History Society
Mr Hubbard	The National Trust
Annette Elliott	United Co-Operatives Ltd
Mr Cook	Defend Lytham
Mr O'Donnell	The National Probation Service
Mr Dickson	Building Control, Fylde Borough Council
Mr Fogden	Smiths Gore (Duchy of Lancaster)
Douglas Chalmers	Country Land & Business association
Helen Little	National Farmers Union
	Lancashire Bridleway Strategy Team
Mr Hogarth	British Horse Society
Mrs Clarke	Fylde Naturalist Society
Mr Sandford	The Woodlands Trust
Mr A Blakely	Staining Parish Council
Mr A Sharples	Medlar with Wesham Town Council
Mr KM Armistead	Freckleton Parish Council
Mrs M Barnes	Kirkham Town Council
Mr F Wilson	Newton with Clifton Parish Council
Mrs V Elvy	Little Eccleston with Larbreck Parish Council
Mr Coleman	Elswick Parish Council
Mr D Kirkham	Greenhalgh with Thistleton Parish Council
Mrs J Kirkham	Westby with Plumpton Parish Council
Mrs Mason	Singleton Parish Council
Mrs G Mason	Treales Roseacre and Wharles Parish Council
Mr Jackson	St Annes on the Sea Town Council
Mr H J Gigg	Ribby with Wrea Green Parish Council
Mrs J Kirkham	Weeton with Preese Parish Council
Mr T Wood	Bryning with Warton Parish Council
Mr Fisher	Lawn Tennis Association
Mrs Langhome	Fylde Coast Bridleways Association
Mr Potter	Lytham St Annes Safe Cycling
Mrs Thompson	Kirkham Residents Association
Ms Anyon	Royal Hill Neighbourhood Watch
Ms Atkinson	Royal Hill Neighbourhood Watch
Mr Wardle	Ramblers Association

Name	Organisation
Messrs Barlow	Seaview Caravan Park
Mr Forward	Vine Caravan Park
Mr C O'Connor	
Mr McCarthy	
Mr and Mrs Armistead	
Mr Lancaster	
Mr Johnson	Lynwood Caravan Park
Mr Sharples	Wyre Chalet Park
	Clifton Fields Caravan Park
Ms Ball	
Ms Halsall	
HAS Carroll	
Mr Rawcliffe	
Rev Oldland	Ansdell Baptist Church
Mrs C Dawson Brown	Ansdell Unitarian Church
Mr Johnson	Church Road Methodist Church
	Fairhaven Methodist Church
Mr Manfredi	Holy Family Catholic Church
Mr Burgess	Lytham Methodist Church
Mr Mariani	Mount Olivet Pentecostal Church
Canon Turner	Churches Together Our Lady Star of the Sea
Rev Clitheroe	St Cuthbert's Church Lytham
Father McElroy	St Alban's RC Church
Ronnie McKelvie	St Annes Baptist Church
	St Annes United Reformed Church
Rev Lyon	St Anne's Parish Church
Mr Williams	St Annes Parish Church Singleton
Mrs C Butcher	St John the Divine Church
Father Turner	St Joseph's RC Church
Mr Hodgson	
Rev Worthing	St Paul's Parish Church Warton
Father Hogen	St Peter's RC Church
Rev Carey	St Paul's Church Fairhaven
Rev Law-Jones	St Thomas' Parish Church
Mrs Tingle	The Dirve Methodist Church
	The White Church
Wre-Hilton	Churches Together
	Church Commissioners
Mr Sunter	Diocese of Blackburn
B Tempest	St Annes Christian Council
	Kirkham Methodist Church
Steve Connell	Fylde Congregations of Jehovah's Witnesses
Rev Jones	Christ Church Wesham Treales
Mr & Mrs Challinor	
Mr Stead	
	Lancashire Constabulary Community Safety and Partnership Dept
	Natural England

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
Miss Bust	The Coal Authority
Mr Litherland	NHS North West Estates
Mrs Alder	Highways Agency
	Blackpool Wyre & Fylde Community Health Services
Mr Nelson	English Heritage
Mr Southworth	Environment Agency
Carol Spiers	Fylde PCT
Damien Holdstock	ENTEC UK Ltd
Kim Wisdom	The Wildlife Trust for Lancashire
Mr Hardman	United Utilities North West
	United Utilities Pylons, Electric Substations Estates and Wayleaves
	Ofcom
	BT Cellnet O2 UK Ltd
	Vodafone
	One 2 One T-Mobile UK Ltd
	Orange Personnel Communications Services Ltd
Mr Westmoreland	CPRE – Fylde District
Mr Benson	Community Safety Department
	BWEA Renewable UK
Dr Atherton	North Lancs primary Care Trust
	Mobile Operators Association
Andrew Teague	NHS Trust
Ms McLaughlin	Homes and Communities Agency
	NHS North Lancashire
	NW Federation for Sport Recreation and Conservations
	Sport England North West
Mr Thompson	Fairhaven Golf Club
	Lytham Green Drive Golf Club
	Old Links Golf Club
	Royal & Ancient Golf Club of St Andrews
	Royal Lytham & St Annes Golf Club
Mr Melling	Kirkham Grammar School
Mr Ollemshaw	Carr Hill High School
Mr Wood	Lytham St Annes Technology College
Mr L M McMillian	Bryning with Warton St Paul's C of E Primary School
Mr Worthy	Freckleton C of E Primary School
L W Pimlott	Freckleton Strike Lane Primary School
C Barnes	Heyhouses Endowed C of E Primary School
Mr Manfredi	Holy Family Catholic Primary School
	Kirkham and Wesham Primary School
	Kirkham St Michaels C of E Primary School
M L Eatough	Lytham C C Voluntary Aided Primary School
R V Redcliffe	Lytham St Annes Ansdell Primary School
Mr Croft	The Willow Catholic Primary School

Name	Organisation
P M Hewitt	Treales C of E Primary School
C J Horrocks	Weeton Primary School
S Bolsher	Weeton St Michaels Voluntary Aided Primary School
Mrs Hodges	Our Lady Star of the Sea RC School
	Ribby with Wrea Endowed C E School
	St Annes College Grammar Junior & Nursery School
	St Joseph's Catholic Primary School
	St Peter's RC School
H E Bracegirdle	King Edward & Queen Mary School
Mr Burd	Blackpool Transport Services Ltd
Mr Mellor	Stagecoach North West
	First North Western
	Arriva Trains Northern Ltd
	Northern rail Ltd
	Network Rail Town Planning Team
	Network Rail outside Parties
Mr Smith	Blackpool & Fylde Rail Users Association
Mr Rankin	Blackpool International Airport
	North West preservation Trust
	Heriatge Trust for the North West
Mr Hawley	Centrepoint
Mrs Jackson	Church Road Day Care Centre
Mr Cook	Fylde Citizens Advice bureau
M Glassrock	Community Association Lytham
Ms Carroll	Connect Young People's Centre
Mr Keylock	Council for Voluntary Service
	Cruse Bereavement
Mr Goldberg	Depressives Self Help Group St Annes
Mr Tallboys	Drugline Lancashire Ltd
Mr Hummer	Dyspraxia Trust Lancashire
Mr Leigh	Eatsreigh Animal Sanctuary
N Stokes	Fylde Community Link
Mr Green	Fylde Otters
	Handicapped Aid Trust
	League of Friends of Clifton Hospital
Mr Fosberry	Lions Club Kirkham & Fylde
Mr Goldberg	Mental Health Forum Blackpool
Mr Jones	Blackpool, Fylde & Wyre Multiple Sclerosis Society
Mr Sharples	The Ormerod Home Trust Ltd
Mr Armstrong	Parent Network
Mr Davies	Pierpoint House
Mr Cole	P I P
Mr Niland	Public Participation
Mr Green	Richmond Fellowship
G Hagan	Rotary Club of St Annes on Sea

Appendix 9: Bodies Consulted Under Regulation 18

Name	Organisation
Ms Beddows	Soroptomists International Fylde
Mr Olsen	St John's Ambulance Lytham St Annes
Mr Powell	Sydney Street Family Centre
Mr O'Donnell	Wyre & Fylde Youth Offending Team
Marion Coupe	Lytham St Annes Civic Society
Mr Heeley	Lytham Against Inappropriate Dev Action Group
Mr Haythornthwaite	Dock Road Action Group
J Harrison	Supporters of Ashton Gardens
B Rendle	C R O W D
Mrs Cryer	Action Ribble Estuary
Rose Freeman	The Theatres Trust
John Cronin	Fylde Coast YMCA
In addition there were 376 individuals who had requested to be on the database who were consulted.	

