



Yvonne Wright
c/o Tony Blackburn
Programme Officer
15 Ottawa Close
Blackburn
BB2 7EB

Our Ref: Inspector 3

Your Ref:

Please Ask For: Julie Glaister

Telephone: 01253 658687

Email: julie.glaister@fylde.gov.uk

Date: 10 May 2017

Dear Mrs Wright

Fylde Borough Council Local Plan – Duty to Cooperate, Objectively Assessed Need and the Development Strategy

1. In response to your letter of the 11th April, I am now able to provide the outstanding information that you have requested and to confirm the matters set out in my letter of 3rd May 2017.

Duty to Cooperate

2. I can confirm that the Duty to Cooperate wording provided in my letter of the 3rd May was ratified by the Planning Committee on the 8th May 2017.

Objectively Assessed Housing Needs (OAHN)

3. With respect to the paper that you requested in your letter on the 11th April, please find enclosed a document entitled '*The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032 (May 2017)*' which contains two Appendices. Appendix 1 is the Fylde Addendum 3: Analysis of the OAN in light of the 2014-based based SNPP and SNHP (Turley) and Appendix 2 is the Independent Assessment of the Economic Prospects of Fylde (Amion Consulting).
4. These documents were considered by the Council's Planning Committee on the 8th May 2017 who resolved that the Housing Requirement for Fylde Borough to 2032 is 415 dwellings per annum and that the Local Plan be amended accordingly.
5. The Council have also enclosed an updated Housing Trajectory which demonstrates that the Local Plan is able to provide in excess of 415 dwellings per annum. In reviewing the Housing Trajectory, it has been revealed that small site completions from 2011-2016 contained some errors which have also been amended in the updated trajectory.

Development Strategy

6. The Council have reflected on your initial comments on its proposed amendments to Policy DLF1 and wish to put forward the following alternative wording.

Policy DLF1

Development Locations for Fylde

The Local Plan will promote the delivery of sustainable development to provide a minimum of **8,715** new homes along with a minimum of **60.6 Ha** (gross requirement) of employment land over the plan period to 31 March 2032.

Broad Distribution of Development

Strategic Locations for Development

The Local Plan Development Strategy is to direct the majority of future growth to the most accessible and sustainable locations specifically centred around four Strategic Locations for Development.

The four Strategic Locations for Development are:

- **Lytham and St Annes;**
- **Fylde-Blackpool Periphery;**
- **Warton;** and
- **Kirkham and Wesham.**

Development will occur on sites identified in Policies SL1 – SL4 and Policy EC1 to provide the broad distribution of development as follows:

Strategic Location for Development	Minimum number of homes provided on identified sites	Percentage of total housing supply provided by identified sites in these locations	Identified new employment land Ha*
Lytham and St Annes	1993	23%	5.4
Fylde-Blackpool Periphery	2422	27%	53.1
Warton	1330	15%	0.0
Kirkham and Wesham	1332	15%	1.1

* excludes existing employment land

Development of the Strategic Sites at these Strategic Locations is key to ensuring that the Development Strategy is achieved.

Non-strategic Locations for Development

The Non-strategic Locations for Development comprise the Local Service Centre of Freckleton, the Tier 1 Larger Rural Settlements and the Tier 2 Smaller Rural Settlements.

Sites of 10 or more dwellings comprising a minimum of 787 homes (approximately 9% of all homes) and 2.4 Ha of new employment land will be located at Non-strategic Locations for Development.

Windfalls

Small housing sites (amounting to between 1 and 9 homes) are not identified within the plan; they can occur throughout the borough where compliant with the other policies of the plan. Small sites are provided for through a windfall allowance of 40 homes per annum in years 11 to 21 of the plan. The delivery of small sites that are already committed is included within the Housing Trajectory (Appendix 2): this provides for the delivery of small sites up to year 10 of the plan. Small committed sites and windfalls yet to come will provide at least 1007 homes within the plan period (approximately 11% of the total housing supply). There may also be some larger windfall sites that will contribute to this figure.

Development Sites

Sites are identified in Policies SL1 to SL5, Policy EC1 and in the Housing Trajectory (Appendix 2). Strategic development sites (amounting to 100 or more homes) are prefixed by the letters **HSS** (for housing) or **MUS** (for mixed-use). Non-strategic housing sites (amounting to between 10 and 99 homes) are prefixed by the letters **HS**. New employment sites are prefixed by the letters **ES**. Small housing sites (amounting to between 1 and 9 homes) are not identified within the plan.

Development will contribute towards sustainable growth, the continuation and creation of sustainable communities, by their locations and accessibility and through the sustainable use of resources and construction materials.

7. The policy is intended to cover the distribution of development, and as such further references to employment land have been added.
8. The separate sections on the location, distribution and sites were provided in response to earlier comments, to clarify the meanings of the terms used. In response to your latest comments, the first two sections have been combined. However, it was considered that to include the section on sites within the initial section would restore the original source of confusion, and this has therefore been left separate; the text of this section has been simplified to reduce duplicate wording.
9. In response to your question within the email of 6th May 2017 in relation to Policies SL1 – SL5, you are correct in surmising that the policies allocate all sites listed within the policies, which are then carried into the Housing Trajectory. This includes sites with planning permission, sites minded to approve and partially completed sites as well as allocations.

10. Windfall sites occur where they occur and therefore, while forming part of the overall development strategy, they do not form part of the locational strategy. Therefore, the headings provided in the table are necessary to clarify that the number and proportion refer to identified sites in these locations, and do not include windfalls, which may not necessarily occur in similar proportions. The stress on the identified sites necessarily reflects that the development strategy is based on specific sites.
11. The inclusion of the column indicating the proportion of housing supply provided by identified sites at the strategic locations for development is necessary to ensure that the plan is delivered in accordance with the strategy, for instance in the face of a development proposal that would significantly upset the proportions shown. The percentage distribution would therefore be used in conjunction with the minimum figure.
12. It is agreed that the section on existing land uses would be better elsewhere in the plan, and accordingly it is proposed that the section of text is moved to replace the whole of the text in criterion "t" of Policy GD7.

Policy H7

13. Finally, I can confirm that the proposed revision to Policy H7 set out in the Council's letter of 3rd May 2017 was ratified by the Council at the meeting of the Planning Committee on the 8th May 2017.
14. I hope the Council's decisions and proposed modifications satisfy the issues raised in your letter of the 11th April 2017 and your initial comments on amendments to Policy DLF1.

Yours faithfully



Julie Glaister Planning Policy Manager